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Item No. 7.1	Classification: OPEN	Date: 5 November 2019	Meeting Name: Planning Committee
Report title:	<p>Development Management planning application: Application 18/AP/3284 for: DECISION NOTICE</p> <p>Address: 596-608 OLD KENT ROAD AND LAND AT LIVESEY PLACE LONDON SE15 1JB</p> <p>Proposal: 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.</p> <p>This application represents a departure from strategic policy 10 'Jobs and Businesses' of the Core Strategy (2011) and Saved Policy 1.2 'Strategic and Local Preferred Industrial Locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location.</p> <p>An associated Listed Building Consent Application has been submitted under reference 18/AP/3285.</p>		
Ward(s) or groups affected:	Old Kent Road		
From:	Sarah Parsons		
Application Start Date 15/10/2018		Application Expiry Date 14/01/2019	
Earliest Decision Date			

RECOMMENDATION

1. a) That planning permission is 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 5th May 2020.

b) That the environmental information be taken into account as required by Regulation 30 of the Town and Country Planning (Environmental Impact Assessments) Regulations 2017.

c) That following issue of the decision it be confirmed that the Director of Planning shall place a statement on the Statutory Register pursuant to Regulation 30 of the Town and Country Planning (Environmental Impact Assessments) Regulations and that for the purposes of Regulation 30(1) (d) the main reasons and considerations on which the Local Planning Authority's decision is based shall be set out as in this report.

d) In the event that the requirements of (a) are not met by 5th May 2020 that the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 773 of this report.

EXECUTIVE SUMMARY

2. The proposed development comprises the comprehensive redevelopment of the application site on the corner of Old Kent Road and Peckham Park Road. The 0.43 hectares (ha.) site is currently occupied by the Everlasting Ministries Church, in the former North Peckham Civic Centre, and a Topps Tiles retail store. To the rear of the site on Livesey Place, are long term vacant industrial buildings.
3. There is a Grade II listed mural mounted on the former Civic Centre building. If Planning and Listed Building Consent were granted, the mural would be carefully removed and safely stored during the demolition and construction phases of the scheme. It would then be re mounted on the new building, in broadly the same location as it is found today. Accordingly, an application for Listed Building Consent is also under consideration. The planning reference for this is 18/AP/3285.
4. The development would provide 372 new homes, which would make a good contribution to meeting the borough's housing need. The applicant has committed to providing 35% affordable housing overall, measured by habitable rooms, which would be split 25.8% Social Rented homes and 9.2% intermediate homes.
5. The proposed development has been designed as a new urban block, comprising a three to four storey podium at the base, with three residential buildings above it. The lowest of the buildings, on the site of the Topps Tiles store, would be ground plus nine storeys in height. The tallest of the buildings, on the site of the former Civic Centre building, would be ground plus 38 storeys. The building, on Livesey Place, would be ground plus 24 storeys. The buildings would be of a very high quality architectural design, with a clear sense of order, well articulated forms and subtly varied elevations. They would contribute positively to the London skyline, with distinctive and well resolved silhouettes. Whilst there would be some harm to views from/into Cobourg Road Conservation Area, Glengall Road Conservation Area and Caroline Gardens Conservation Area, the harm caused would be less than substantial in NPPF terms and would be outweighed by the wider regeneration benefits of the proposals.
6. The new homes would offer a good standard of accommodation for future occupiers, and the development would provide high quality private and communal amenity spaces for all residents and play spaces for children. There would be shortfall in the quantum of private

and communal amenity space, play space and public space when compared against supplementary guidance and draft planning policy, but this would be fully mitigated by financial contributions that could pay for the creation of the neighbouring Frensham Street Park. Overall, 63.4% of the new homes would be dual aspect, which is a very good level of compliance for a dense, urban scheme of this nature. Overall, the scheme would fall slightly short of the housing bedroom mix required by policy, but the mix within the affordable provision would fully compliant. 10% (rounded) wheelchair housing would also be provided.

7. A new, purpose designed church facility of 1,557 sqm is proposed for the Everlasting Arms Ministries. Although this is smaller than the building they currently occupy, it is specifically designed according to their requirements and would far better suit their needs.
8. The proposed development would contribute a small area of land to the new linear park proposed in the draft Old Kent Road Area Action Plan. It would also improve permeability in the area by enhancing and extending Livesey Place into the proposed linear park. Further enhancements would also be made to Old Kent Road, including a widened footway, and Peckham Park Road, where a small new urban square would be created at the entrance to the replacement church.
9. Part of the site is designated Strategic Industrial Land. As such, the scheme must demonstrate that there would be no net loss of industrial floor space. 2,193 sqm (GIA) B Class floor space is proposed overall. Whilst all of this would be designed to B1(c) (light industrial) specification, 1,271 sqm (GIA) would be secured as B1(c) only. This exceeds the potential for light industrial floor space in the portion of the site designated as Strategic Industrial Land, calculated on a 65% plot ratio, by 47 sqm (GIA). A condition has been included on the draft decision notice to ensure this is delivered. The remainder of the B class space would be B1(c) or B1 (a) (office).
10. 10% affordable workspace has been secured, which would be used to support existing or new businesses. The Legal Agreement can specify that this floorspace is offered to Old Kent Road businesses first, to benefit the existing business community.
11. 572 sqm (GIA) retail (A1-A4) floorspace is also proposed, which represents an uplift of 159 sqm on the site. This, along with arrangement of residential entrances, the replacement church and the B class floor space, would ensure active and vibrant frontages on each edge of the new urban block. The Legal Agreement would require a Retail Marketing Strategy to set out how local, independent businesses would be prioritised when the retail units are ready to be occupied.
12. There would be significant adverse impacts on some neighbouring residential properties in terms of daylight and sunlight. These are set out in full in the relevant section of this report, where it is concluded that only very substantially lower massing, which would not deliver the wider regeneration benefits of the proposals under consideration here, would have a reduced impact on daylight. On balance, these adverse impacts are considered to be outweighed by the regeneration benefits of the proposals.
13. The proposed development has been subject to two rounds of statutory consultation. Eight objections have been received in total. The main concerns raised are around the building heights proposed and the affordable housing offer.
14. The proposal would incorporate measures to reduce its carbon dioxide emissions, and a

contribution to the council's carbon off-set green fund would be secured through the Section 106 Agreement. A range of other Section 106 obligations would also be secured.

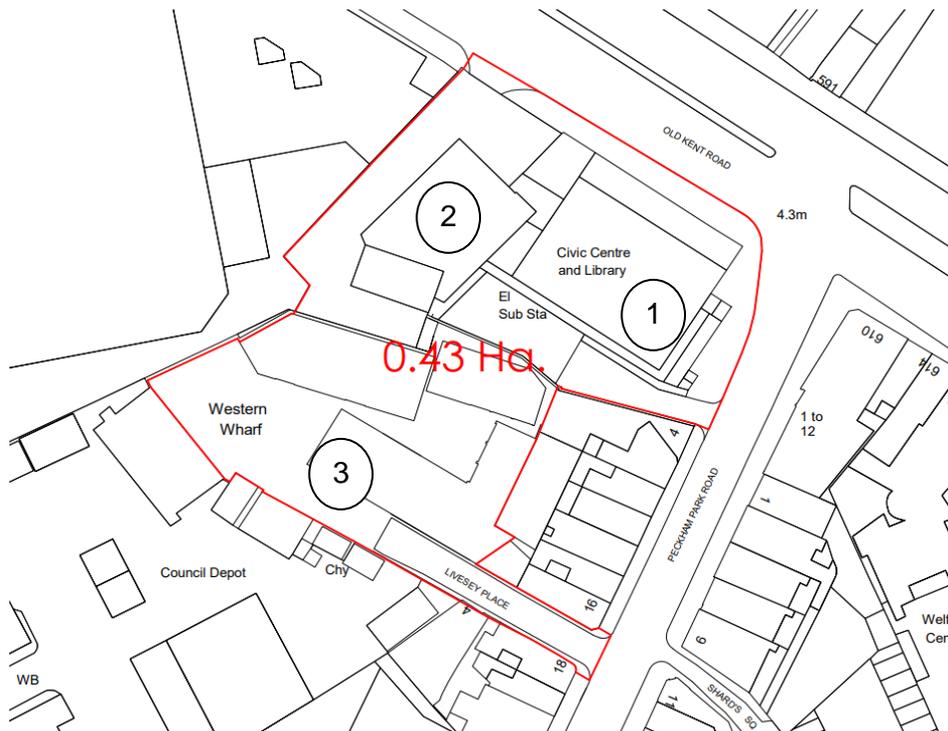
15. Overall, the benefits of the proposed development are considered to outweigh the harm caused, and it is recommended that planning permission be granted, subject to conditions and the signing of a S106 agreement and referral to the GLA and Secretary of State.

BACKGROUND INFORMATION

Site location and description

16. The Application Site comprises a 0.43ha parcel of land located in the Old Kent Road Ward. It is irregular in shape, made up of three land holdings that have been consolidated for the purpose of comprehensive redevelopment. These consist of:
 - 1) The former North Peckham Civic Centre site, on the corner of Old Kent Road and Peckham Park Road (Nos. 600-608 Old Kent Road);
 - 2) The existing Topps Tiles site to the west of the former Civic Centre (Nos. 596-598 Old Kent Road); and
 - 3) Land at Livesey Place to the south, formerly known as Western Wharf.

Image: Site Plan, numbered as per description above



17. The former North Peckham Civic Centre, now occupied by The Everlasting Arms Ministries, comprises four storeys plus a basement. Attached to the existing building, fronting onto the Old Kent Road and Peckham Park Road, is the Grade II listed mural 'The History of Old Kent Road' by Adam Kossowski. The Civic Centre building itself is not listed, and the site does not sit in a Conservation Area.

18. The neighbouring Topps Tiles retail store is a single storey building with small parking/servicing forecourt to the front. To the south, on Livesey Place, is a cluster of buildings ranging from two to four storeys in height and a small yard. All of these buildings are long vacant since, but their last lawful use was for light industrial purposes.
19. The existing building floor areas, confirmed by measured survey undertaken by the applicant, are identified in the table below:

Table: Existing Area Schedule

	Former Civic Centre Site	Topps Tiles Site	Land at Livesey Place
Occupier	Everlasting Arms Ministries	Topps Tiles	Vacant
Use Class	D1	A1	B1(c)
Sqm (GIA)	2,656	413	1,153

20. Vehicular access to the Application Site is currently provided from Old Kent Road (to Topps Tiles), Peckham Park Road (to the former North Peckham Civic Centre rear car park) and via Livesey Place from the southeast.
21. The Application Site has a Public Transport Accessibility Level (PTAL) of 4 on a scale of 1 to 6, where 1 is the lowest level and 6 represents the highest. The nearest underground station is Bermondsey (Jubilee line) approximately 1.2 miles north. Queen's Road Peckham (Overground and Southern Trains) and (South Bermondsey) are the closest train stations, approximately 800m south-east and north-east respectively. Frequent bus services run via Old Kent Road and Peckham Park Road, with bus stops located in close proximity.
22. The area surrounding the Application Site is varied in terms of building typologies and uses. To the west is the Cantium Retail Park, which comprises a number of large format retail stores and car park. To the south is the Council's Frensham Street Depot, with the residential Northfield House beyond. To the immediate southeast is a row of three storey terraced properties at 6 to 16 Peckham Park Road. These are typically local convenience retail and services at ground floor with ancillary and residential space above, and the terrace is designated as a Protected Shopping Frontage. There is a similar terrace on the other side of Peckham Park Road. Old Kent Road forms the northern boundary of the Application Site and is under Transport for London's (TfL) control. On the other side of Old Kent Road are more large format retail stores and car parking.
23. No. 6 Peckham Park Road is subject to a 2016 planning permission for a two storey side and rear extension, which is now completed (ref. 16/AP/1089). Planning permission was also granted in August 2018 for the redevelopment of No. 16 Peckham Park Road and No. 1 Livesey Place to provide a new part three, part four storey building including retail at ground and five residential units above (18/AP/0564).
24. There are no listed buildings or Conservation Areas in the immediate vicinity of the site. Within 1km of the site boundary there are a number of heritage assets, including the Glengall Road Conservation Area to the north-west, Peckham Hill Street Conservation Area to the south-west, and the Caroline Gardens Conservation Area to the south-east.

Details of Proposal

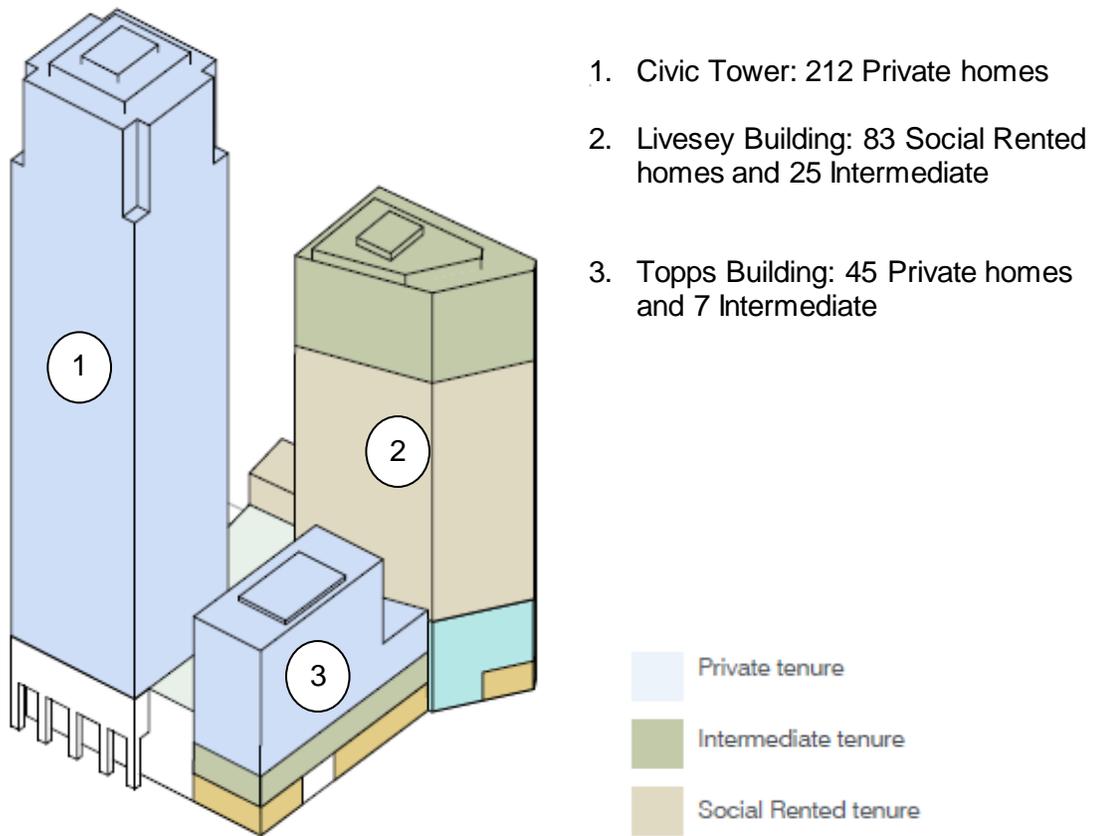
25. The proposed development would demolish all of the existing buildings and structures on site, with the exception of the Grade II listed mural, which would be carefully removed and stored before being re-mounted on one of the new buildings. In their place, a new mixed-use development comprising of 372 new homes, including 35% affordable housing (calculated by habitable rooms), with 25.8% social rent and 9.2% intermediate. In addition, there would be 2,193 sqm B class floor space (with 1,271 sqm secured as B1 (c) only), 572 sqm retail provision, and a new church facility designed to meet the needs of The Everlasting Arms Ministries would be delivered.

Table: Proposed non residential land uses

Land Use	Use Class	GIA
Office / light industrial	B1 (a) / B1(c)	922
Light industrial only	B1 (c)	1,271
Retail	A1 – A4	572
Church	D1	1,557

26. In addition, 472.3 sqm of the site would be given over to new public realm, including wider footways on Old Kent Road, a small new public square on Peckham Park Road, an extension of Livesey Place and a contribution to the linear park proposed in the draft Old Kent Road AAP. Within the proposed urban block there would be a series of rooftop gardens and terraces, providing a total of 1,546 sqm of communal amenity space and play space.
27. In terms of scale, the proposal comprises three residential buildings set above a shared central plinth of three to four storeys. There would be a single level of basement underneath this. The tallest building would be ground plus 38 storeys (+142.80m AOD), sited at the corner of Old Kent Road and Peckham Park Road. The building on the land at Livesey Pace would be ground plus 24 storeys (+93.95m AOD). The building on the Topps Tiles site would be ground plus nine storeys (+41.55m AOD).
28. For ease of reference, each residential building is named after the part of the application site on which it would be found. The Civic The 372 homes proposed would be distributed within these buildings in the manner shown in the following table and diagram.

Image: Tenure Mix diagram



29. Across the whole site, the housing mix would be as follows:

Table: Housing mix

Unit size	No. of homes	% of homes
Studio	12	3.2%
1 bed	148	39.8%
2 bed	170	45.7%
3 bed	42	11.3%
Total	372	

30. The proposals would be car free with the exception of 16 disabled car parking spaces and 6 managed short stay bays for essential visitors such as carers. A shared on-site service area would be provided at ground floor, with a basement parking area below, accessible by way of a car lift.

Revisions and Amendments

31. A number of amendments were made during the course of the application as a result of consultation responses and negotiation with officers. These revisions and amendments are fully incorporated into this report. Following the revisions, the application was subject to a 28 day re-consultation.

32. The most significant changes and revisions were as follows:
- Changes in apartment mix and tenure to increase the affordable quantum to 35% by habitable room and to increase the number of family (3 bed or larger) apartments in the scheme;
 - Changes to the Light Industrial (B1c) floorspace to increase area and improve offer; and
 - Changes to the Livesey building elevations as a result of the apartment changes and to improve their appearance.

Relevant planning history

33. The Application Site has been subject to various applications over the years, but they have all been for minor development works, changes of use and installation of telecoms equipment and are therefore not relevant to this application.

Pre Application Advice

34. 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 centred around the provision of affordable housing, the height and massing of the proposals, the re-provision of employment floorspace, access and servicing, the retention of the Grade II listed mural, the amenity space and play space, the quality of the residential accommodation and potential impacts upon surrounding occupiers.

Scoping Opinion

35. An Environmental Impact Assessment Scoping Opinion was submitted to determine the extent of issues to be considered and assessed in the Environmental Statement (ref. 17/AP/4200). A formal response was issued on 19th December 2017 and followed up with written clarification on 2nd February 2018.

Planning History of Adjoining Sites

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

37. 18/AP/0564 16 Peckham Park Road and 1 Livesey Place

Application type: FULL

38. Demolition of existing buildings and construction of a part three, part four storey building with retail and warehouse (A1) use on the ground floor and 5 residential units (3 x 2-bedroom and 2 studio flats) on upper floors.
39. Decision: Granted with Grampian Condition (3rd August 2018).

40. 17/AP/2773 Malt Street Regeneration Site, Land Bounded By Bianca Road, Latona Road, Haymerle Road, Frensham Street, and Malt Street
41. Application type: FULL and OUTLINE
42. Hybrid application comprising a full planning application for Phase 1 (the "Detailed Component") and outline planning permission (the "Outline Component") for Phases 2 and 3:
43. Detailed Component (Phase 1):
44. Full planning permission for the demolition of existing buildings and structures and redevelopment of the central area for the erection of a total of 4 buildings, two at 7 storeys (Buildings B9 and B12), one at 15 storeys (Building B10), and one at 44 storeys (Building 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 (retail), Class B1 (business) and Class D1 (public services) and D2 (entertainment and leisure) use, an energy centre (750 sqm) and new public open space and public realm with on street and basement car parking spaces and cycle spaces.
45. Outline Component (Phase 2 and 3):
46. 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 (retail), Class B1 (business), Class D1 (public services) and D2 (entertainment and leisure) use and car parking spaces at ground level and cycle spaces, with associated new open space, public realm, car parking and associated works. Totals: Up to 1,300 homes and up to 7,000sqm commercial floorspace.
47. Decision: Resolution to grant, subject to a legal agreement, referral to the Mayor of London and Secretary of State (3rd June 2019).
48. 18/AP/0897 Ruby Triangle Site, Land bounded by Old Kent Road, Ruby Street and Sandgate Street
49. Application type: FULL
50. 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.
51. Decision: Granted (6th June 2019)

52. 18/AP/3246 Land at Cantium Retail Park, 520 Old Kent Road
53. Application type: FULL
54. 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.
55. Decision: Resolution to grant, subject to a legal agreement, referral to the GLA and Secretary of State (5th March 2019).
56. 17/AP/4596 13-14 Frensham Street, (Nye's Wharf)
57. Application Type: FULL
58. 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.
59. Decision: Resolution to grant, subject to a legal agreement and referral to the GLA (3rd September 2018).
60. 17/AP/4612 49-53 Glengall Road
61. Application type: FULL
62. 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.
63. Decision: Resolution to grant, subject to a legal agreement, referral to the GLA and Secretary of State (15th January 2019).
64. 18/AP/3551 Southernwood Retail Park
65. Application type: FULL and OUTLINE
66. Hybrid planning application for detailed permission for Phase 1 and outline planning permission for Phase 2 comprising:
67. 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.

68. 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.
69. Decision: Resolution to grant, subject to legal agreement, and referral to GLA (28 May 2019).

KEY ISSUES FOR CONSIDERATION

Summary of main issues

70. The main issues to be considered in respect of this application are:
- The principle of the proposed development in terms of land use and the release of the site from its industrial designation;
 - Environmental impact assessment;
 - Affordable housing;
 - Design, layout, heritage assets and tall buildings including views;
 - Public realm, landscaping and 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;
 - Light pollution;

- Health Impact Assessment;
- Socio-economic impacts;
- Equalities and human rights;
- Statement of community involvement; and
- Other matters

Legal Context

71. 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.
72. 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

73. The statutory development plans for the Borough comprise the National Planning Policy Framework 2019, 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 (draft OKR AAP).

Planning Policy Designations

74. The application site is found within the following Planning Policy Designations:
- The Old Kent Road Opportunity Area;
 - Draft OKR AAP site OKR 10;
 - (PARTIALLY WITHIN) The Old Kent Road Preferred Industrial Location (Strategic);
 - The Urban Density Zone;
 - Bermondsey Lake Archaeological Priority Zone and Old Kent Road Archaeological Priority Zone;
 - The Air Quality Management Area;
 - Public Transport Accessibility Level (PTAL) of 4;
 - Extended background area (Wider Setting Consultation Area) of LVMF views 2A.1, 3A.1, and 6A.1 and
 - Flood Zone 3
75. The nearest Conservation Areas are Glengall Road, Peckham Hill Street and Caroline Gardens.
76. The mural attached to the ground floor of the existing Civic Centre building is Grade II listed. The listing does not include the Civic Centre itself.
77. 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.

Adopted Policy

National Planning Policy Framework

78. The revised National Planning Policy Framework ('NPPF') was published in February 2019 which sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental.
79. Paragraph 212 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.

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

80. National Planning Policy Guidance (2014) is a web-based resource which brings together planning guidance on various topics into one place.

London Plan 2016

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

Policy 2.17 Strategic Industrial locations

Policy 3.1 Ensuring Equal Life Chances for All

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 3.16 Protection and Enhancement of Social Infrastructure

Policy 4.3 Mixed use development and offices

Policy 4.4 Managing industrial land and premises

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

82. 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”. 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.
83. 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.

Mayoral SPGs

84. The following Mayoral SPGs are relevant to the consideration of this application:

Homes for Londoners (2017)
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)

Core Strategy 2011

85. 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 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

86. 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
- 1.2 - Strategic and local preferred industrial locations
- 1.5 - Small businesses
- 2.2 - Provision of new community facilities
- 2.5 - Planning obligations
- 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)

87. The following Southwark SPDs are relevant to the consideration of this application:

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)

Emerging Planning Policy

Draft New London Plan

88. 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 Inspector's report is awaited. Given the stage of preparation it can only be attributed limited weight.
89. The draft New London Plan identifies the Old Kent Road as having a minimum capacity for 12,000 homes and a jobs target of 5,000, which increases the capacity of the adopted London Plan of 2,500 homes and 1,000 jobs.

New Southwark Plan

90. 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) in February 2018 and some Amended Policies were consulted on between January and May 2019. It is anticipated that the plan will be adopted in early 2020 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.

Old Kent Road Area Action Plan (OKR AAP/OAPF)

91. 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 4 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 21 March 2018. As the document is still in draft form, it can only be attributed

limited weight.

92. Whilst acknowledging this limited weight, members are advised that the draft OKR AAP places the application site within the proposed Action Area Core, and within proposal site OKR 10 which covers the area bounded by Glengall Road, Latona Road and Old Kent Road. Requirements for this allocation site include requiring existing employment and retail floorspace to be replaced and frontages along Old Kent Road activated through provision of retail (A Class), business (B Class) or community uses (D Class). Also relevant to this specific site are the requirements to provide a new park, roughly on the alignment of the Surrey Canal and provide on site servicing.

EQUALITIES

93. The Equality Act (2010) provides protection from discrimination for the following protected characteristics: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership. Section 149 of the Equality Act 2010 places the Local Planning Authority under a legal duty to have due regard to the advancement of equality in the exercise of its powers, including planning powers. Officers have taken this into account in the assessment of this application and Members must be mindful of this duty, inter alia, when determining all planning applications. In particular Members must pay due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act; and
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

94. As set out in the Essential Guide to the Public Sector Equality Duty (2014), “the duty is on the decision maker personally in terms of what he or she knew and took into account. A decision maker cannot be assumed to know what was in the minds of his or her officials giving advice on the decision”. A public authority must have sufficient evidence in which to base consideration of the impact of a decision.

95. There is one church, The Everlasting Arms Ministries, currently occupying the former North Peckham Civic Centre. The church has a capacity for 418 persons. The proposed development would include the demolition and replacement of the Everlasting Arms Ministries Church. The church would also need to be temporarily relocated whilst demolition and construction were underway. No temporary site has yet been identified, but a relocation strategy would be secured by the legal agreement to explore this further.

Affected Groups

96. Impacts upon the following groups sharing protected characteristics have been identified:
- Religion or Belief (due to demolition of existing church); and
 - Race (the congregation of the church is predominantly black and minority ethnic (BME)).

Impacts Upon Users of the Existing Church and Proposed Mitigation

97. Without re-provision, relocation and/or other mitigation, the loss of the existing church would give rise to inequalities for those with the protected characteristics identified above. However, the church would be re-provided on the site, in a new purpose-designed facility of 1,558 sqm (GIA). The current space occupied by the church is 2,656 sqm (GIA). Although this is a reduction in the actual floorspace available to the church, it is important to note that the current facility was not designed as a church, and much of the space is currently unused/underused. The replacement facility would be purpose designed to meet the specific needs of the church, and would result in a more efficient facility that is fit for purpose and more economical to run.
98. The new church and community facility would remain within The Everlasting Ministries ownership. They would get a 999 year lease back of the new facility, ensuring that they maintain a long term presence on the site. The Section 106 Legal Agreement would also secure a Community Use Strategy to ensure that the facility is opened up to the wider community when not in use by the church congregation.

Positive Equality Impacts

99. The proposed church would be arranged over ground, first and second floors of the proposed Civic Tower and would be accessed via a new entrance from Peckham Park Road. The main church hall would be at first floor level, accessed via a grand spiral staircase from ground floor. The main church hall would provide approximately 400 seats together with ancillary space. On the second floor, a gallery around the main church hall would provide capacity for approximately 160 further seats. A second smaller hall is also proposed on the second floor, which would accommodate approximately 70 people. Across all three levels there would be atrium spaces for gathering before and after functions. Externally, the public realm on Peckham Park Road would be designed as a gathering space framed by street furniture and planting.

Image: Section through main church hall and Topps Tiles building



100. The new premises have been designed to meet the specific requirements of The Everlasting Arms Ministries Church, following a number of meetings between the church and project team. A thorough assessment of the church's existing needs and future aspirations has been undertaken and this has informed the final design, ensuring that the new facility would cater for the growing congregation.
101. The new church would maintain a frontage on Old Kent Road and Peckham Park Road. Other residents in the area who share the same faith would have an equal opportunity as existing to attend the church. A BREEAM pre assessment has been carried out and indicates that the church should receive an 'Excellent' rating. This means that The Everlasting Arms Ministries are likely to benefit from a lower expenditure on heating and utilities, as well as reduced maintenance costs, compared to their existing facilities.
102. The design has also taken account of the fact that religious and faith groups can face a disproportionate risk of hate crime. The design of the church has been developed and agreed in principle with the Metropolitan Police Service, and further details, including external lighting, which could reduce fear of crime for any identified equality group, would be required by condition.
103. The location of the main church hall would also minimise the transfer of noise, and the building would be adequately sound proofed, to avoid harm to the amenity of surrounding residents.
104. On the above basis, the proposed development would effectively mitigate against any potential harm to the identified groups through:
 - The provision of a high quality and purpose designed replacement religious and community facility; and
 - Consultation to ensure their direct involvement in the design process.
105. In order to ensure a smooth relocation and re-provision process, which does not result in harm to groups with protected characteristics during the demolition and construction processes, as part of the council's ongoing equalities duties, a Church Relocation Strategy would be required by the Section 106 agreement. This would be written in consultation with the church and would be expected to include a detailed assessment of its specific needs and the ways in which they would be met.

Other Equality Impacts

106. The Strategic Housing Market Assessment (SHMA) prepared on behalf of a number of South East London boroughs states that Southwark, together with Lewisham, has the most ethnically mixed population in the South East London sub-region. Compared to the population at large a very high proportion of Black households (70%) are housed in the social/affordable rented sector. These groups could therefore stand to benefit from the proposed affordable housing, which would include social rented units. The provision of communal amenity spaces to be shared by different tenures would also contribute to the potential for increased social cohesion. This is a positive aspect of the scheme.
107. Proposed enhancements to the streetscape on Old Kent Road and Peckham Park Road would prioritise the movement of pedestrians and promote "healthier, active lives" in

accordance with draft Policy AAP 10 of the draft OKR AAP.

108. The proposed development would also generate additional opportunities for local employment. The proposed development would deliver 2,193 sqm (GIA) B class floorspace on the lower levels of the Livesey Building, which represents an additional 1040sqm over the existing B1 floorspace, which is long term vacant. 10% of the employment space would be let at an affordable rate.
109. In their consultation response, TfL identified potential equalities impacts relating to the proposed cycle parking. They consider that the two-tier stands proposed would make the cycle parking “inaccessible to those with non-standard bikes or without a good level of physical strength and dexterity” and that this would raise issues of equality “since those with the protected characteristics of age, disability and sex will be disproportionately affected.
110. The constraints of the site are such that it is likely that the cycle parking will predominately be provided using a two-tier parking system. A total of 5% of long stay cycle parking spaces will be provided by way of Sheffield stands that will be capable of accommodating larger cycle parking spaces in accordance with London Cycle Design Standards. Detailed design would be secured by condition. Financial contributions would also be made to Santander cycle hire. Officers consider accessibility to and of the stands to be of a good standard, which would encourage and increase cycle use. Officers do not consider that this gives rise to equality issues in relation to the age or sex of cyclists. In relation to disability, larger spaces would be available for tricycles and specialised cycles.

Conclusion on Equality Impacts

111. The proposed development would not result in any adverse equality impacts in relation to the protected characteristics of religion or belief and race as a result of the loss of the existing church on the site as the facility would be re-provided. In addition, the Section 106 Agreement would also require a Church Relocation Strategy to consider in detail the specific needs of the church during demolition and construction. There would also be no adverse equality impacts in relation to the protected characteristics of sex, age and disability as a result of the proposed two tier cycle parking. As such, the proposals would safeguard and promote the objectives of Section 149 of the Equality Act 2010 as far as reasonably possible given the nature of this major regeneration proposal.
112. The proposed development would undoubtedly result in a significant change to the site. The public sector equality duty does not prevent change but it is important that the council consider the acceptability of the change with a careful eye on the equality implications of that change given its duty under Section 149 of the Equality Act 2010. The council's duty is to have due regard to the objectives identified above when making its decision. In the present context, this means focussing carefully on how the proposed change would affect those with protected characteristics and ensuring that their interests are protected and equality objectives promoted as far as possible.
113. Officers are satisfied that equality implications have been carefully considered throughout the planning process and that Members have sufficient information available to them to have due regard to the equality impacts of the proposal as required by Section 149 of the Equality Act 2010 in determining whether planning permission should be granted.

ENVIRONMENTAL IMPACT ASSESSMENT

114. 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.
115. Prior to the submission of this planning application, the applicant requested a 'Scoping Opinion' under Regulation 13 of the EIA Regulations to ascertain what information the Local Planning Authority considered an Environmental Statement (ES) should include. This was issued on 19th December 2017 and followed up with written clarification on 2nd February 2018.
116. In accordance with the EIA Regulations, an Environmental Statement (ES) comprising a Non-Technical Summary, Environmental Statement and Technical Appendices has been submitted. A review of the ES was prepared in May 2019 to provide a review of the proposed design changes and the updated cumulative scheme list in the context of the assessment results reported in the ES submitted alongside the original planning application. The ES documents detail the results of the EIA and provide a detailed verification of the potential beneficial and adverse environmental impacts in relation to the proposed development, including the following areas of impact:
- Socio-Economics;
 - Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare;
 - Wind Microclimate;
 - Noise and Vibration; and
 - Townscape, Built Heritage and Visual Amenity.
117. Through the scoping process it was agreed that that the following topics could be "scoped down", which means they are included within the ES technical appendices but not subject to detailed consideration as a standalone chapter in Volumes II or III:
- Archaeology;
 - Ground Conditions;
 - Water Environment;
 - Biodiversity;
 - Transportation; and
 - Air Quality.
118. 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.
119. In assessing the likely environmental effects of the 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.

Cumulative Effects

120. The EIA Regulations require that all significant effects of a development are considered, including cumulative effects. The two main types of cumulative effects are as follows:
- Inter-project effects: The combined effects of the proposed development together with other reasonably foreseeable developments (taking into consideration effects at both the construction and operational phases); and/or
 - Intra-project effects: The combined effects caused by the combination of a number of effects on a particular receptor (taking into consideration effects at both the construction and operational phases), which may collectively cause a more significant effect than individually.
121. The submitted ES considers a total of 21 other schemes in order to assess cumulative effects. Each of the topic chapters includes a section documenting the assessment of the likely significant cumulative effects of the scheme and the committed developments. These are summarised in the ES and discussed in more detail where relevant in this report. The ES does acknowledge that there would be some adverse impacts caused by the cumulative impacts. Some of these impacts would be temporary and short term i.e. from demolition and construction activity and associated impacts on transport and noise. Some impacts would be long term i.e. after the proposed development has been completed. These include:
- Major Adverse reductions in daylight beyond recommended levels to 1-21 (Odd) Peckham Park Road (residential); 610 Old Kent Road (residential); 6 Peckham Park Road (rear ground to first floor); 8-14 (Even) Peckham Park Road (residential) and Northfield House (please see the Daylight and Sunlight Section of this report for more detail);
 - Moderate Adverse reductions in daylight beyond recommended levels to 18- 24 (Even) Peckham Park Road (residential) and Lewes House;
 - Higher levels of overshadowing caused to cumulative residential schemes to the west and north of the development;
 - Two locations (pavement along Old Kent Road and retail entrance to Topps Tiles building) would experience Minor Adverse wind microclimate effects during winter;
 - Two locations (seating area on level 3 roof terrace and recreational area on level 3 roof terrace) would experience Minor Adverse wind microclimate effects during all seasons;
 - For a limited number of days per year, in the summer time when windows need to be opened to provide cooling, internal noise from traffic sources at all Livesey Tower facades is likely to be of Moderate Adverse Significance, with the exception of the south-east façade, where internal noise from traffic sources is likely to be of Major Adverse Significance;
 - Noise levels from external noise sources (i.e. traffic) on private balconies of the proposed development are likely to result in a Minor Adverse Significance at all locations;
 - Noise from plant and building services noise from the proposed development and the cumulative scheme 16 Peckham Park Road / 1 Livesey Place may result, in the

worst affected receptors (6 Peckham Park Road, 6-16 Peckham Park Road and 18 Peckham Park Road), in a Minor to Moderate Adverse Significance; and

- There would be significant adverse Townscape and Visual Amenity effects ('moderate' or above) for two of the 34 views tested. (Officers consider this to be the case for three views, as set out in the Section of this Report on Heritage Impacts).

122. These impacts are discussed in relevant sections of the report.

Alternatives

123. 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. This legal requirement is expressed in very general and high-level terms, requiring only the inclusion of an outline of main alternatives and an indication of main reasons.

124. The following provides an outline of the alternatives presented and the main reasons for choosing the submitted scheme in preference to them.

125. Initially, the scheme was focussed only on the redevelopment of Civic Centre and Livesey Place buildings, without the Topps Tiles site. Initial designs included two towers of (ground plus) 40 storeys and 35 storeys, together providing the potential to deliver 373 homes and non-residential floorspace. A reduction in building heights was subsequently agreed, to (ground plus) 38 and 24 storeys, which meant that the number of homes was reduced to 324.

126. The later inclusion of the Topps Tiles site within the application site boundary allowed for a total of 372 homes to be proposed, in addition to a greater quantum of non-residential floorspace, across three buildings of ground plus 38, 24 and 9 storeys.

127. The inclusion of the Topps Tiles site allowed for a more comprehensive redevelopment and resulted in the following:

- An increase in the number of homes – helping to meet the identified need for housing;
- Policy compliant affordable housing could be provided on site;
- An increase in the non-residential floorspace, creating additional jobs during operation and benefiting the local economy;
- A larger podium roof garden/amenity space on level three, increasing the proposed amenity space provision.

PRINCIPLE OF DEVELOPMENT IN TERMS OF LAND USE

128. The NPPF (2019) offers a number of key principles that emphasise a focus on driving and supporting sustainable economic development to facilitate the delivery of new homes and commercial business units etc. The application site is located within the Old Kent Road Opportunity Area. In locations such as this, both 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.

129. In the draft OKR AAP, the site is identified as falling within Proposal Site OKR10. The draft site allocation states that redevelopment on this site must:

- Replace existing employment floorspace (B Class);
- Replace existing retail floorspace and frontages along Old Kent Road activated through provision of retail (A Class), business (B Class) or community uses (D Class);
- Contribute to a new linear park; and
- Provide on site servicing.

130. The existing uses on the site (the former Civic Centre building, now occupied by the Everlasting Arms Ministry, vacant warehousing and the Topps Tiles retail unit) are not considered to maximise the potential of this Opportunity Area Proposal Site. The proposed replacement mix of uses, including replacement industrial floor space, retail/café uses, a replacement church, and up to 372 new homes would deliver major regeneration benefits, as discussed in this report.

Image: OKR Sub Area 2, showing Site Allocation OKR 10, with the application site bound in red.



Industrial Land

131. 0.18 Ha of the application site is located in a Strategic Industrial Location (SIL), as identified in the Core Strategy (2011) and London Plan (2017). Strategic Policy 10 of the Core Strategy states that SIL will be protected for industrial and warehousing uses. Saved Southwark Plan Policy 1.2 states that the only land uses that will be permitted in SIL are B class uses and other sui generis uses which would be inappropriate in residential areas. The proposal under consideration here represents a departure from these policies by proposing residential and retail uses in the SIL.

Image: Existing site plan showing the extents of SIL on the application site



132. The Core Strategy does however also recognise that structural changes in the economy are resulting in a declining need for industrial land in London and that diversifying the range of job opportunities in industrial locations can be of benefit to local people. Furthermore, it also sets out the future direction of the Old Kent Road as a growth and regeneration action area, subject to a future area action plan (AAP).
133. Adopted London Plan (2017) Policy 2.17 seeks to promote, manage and where appropriate, protect SIL as London’s main reservoir of industrial and related capacity, which includes general and light industrial uses. It states that developments on SIL should be refused unless they:
- Provide for broad industrial type activities;
 - Are part of a strategically co-ordinated process of SIL consolidation through an opportunity area planning framework;
 - Meet the needs of small to medium sized enterprises; or
 - Provide for small scale ‘walk to’ services for industrial occupiers such as workplace crèches or cafes.
134. The adopted London Plan (2017) also designates the Old Kent Road as an Opportunity Area, with an indicative capacity of 1,000 new jobs and a minimum of 2,500 new homes. This capacity has been increased to a minimum of 12,000 new homes in the emerging new London Plan. Both adopted and new London Plan identify the potential for residential-led development along the Old Kent Road corridor, with homes and jobs targets to be explored and further refined through the preparation of a planning framework and a review of the Old Kent Road SIL.

135. The adopted London Plan states that “Development in SILs for non-industrial or related uses should be resisted other than as part of a strategically co-ordinated process of consolidation”. As noted in the GLA’s Stage 1 consultation response to the application under consideration, “GLA Officers have worked closely with their Southwark counterparts ... and have now agreed a potential geography and phasing of strategic industrial land release and consolidation to provide a degree of certainty to residents, local businesses and developers in advance of a clear BLE delivery programme and Southwark’s adoption of its emerging development plan documents”. In light of this, GLA Officers accept that part of the application site is potentially suitable for SIL release.
136. Further to this, the draft OKR AAP sets targets of 20,000 new homes and 10,000 new jobs, to be supported by new infrastructure, including parks and schools. It proposes the release of a substantial part of the Strategic and local Preferred Industrial Location designation to allow for the creation of mixed use neighbourhoods where new and existing businesses would co-exist with new homes.
137. Paragraph 48 of the NPPF (2019) states that weight can be afforded to relevant policies in emerging plans depending on the stage of preparation of the plan. The New Southwark Plan and draft OKR AAP have been subject to extensive consultation however they have yet to be subject to independent examination and therefore the documents have limited weight. They do, however, provide an indication of the direction of travel for planning policy in the opportunity area.
138. Taking into account the adopted policy position, when determining whether the principle of the proposed development would be acceptable in land use terms, Members need to consider whether the wider regeneration benefits of the scheme would outweigh any harm caused by the loss of SIL and the introduction of residential and retail/café uses into SIL, and whether those benefits would justify a departure from adopted planning policy.

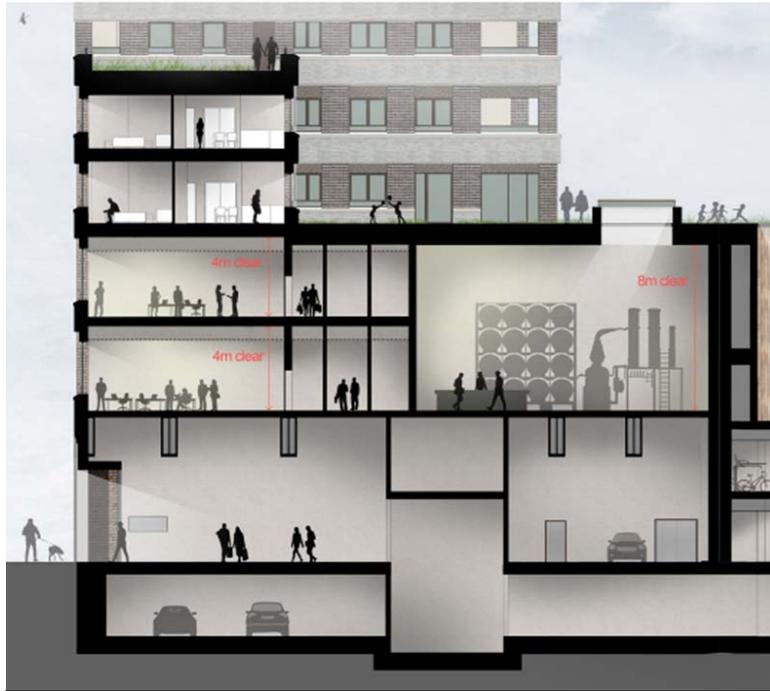
Employment Re-provision (No Net Loss)

139. The existing light industrial floor space on the application site comes to a total of 1,153 sqm (GIA). It is not currently occupied by any users, and has been long term vacant since its last use as light industrial space. The applicant advises that they can find no evidence of the space having been used commercially in over 30 years. Draft London Plan Policy E4 (‘Land for Industry, Logistics and Services to Support London’s Economic Function’) requires Southwark to retain industrial capacity, according to a general principle of “no net loss”. Industrial floor space capacity is defined here as either the existing industrial or warehousing floorspace on the site or the potential industrial or warehousing floorspace that could be accommodated at 65% plot ratio (whichever is the greater). In this instance, the 0.18 ha (1,800 sqm) of SIL on the application site would equate to 1,170 sqm of potential industrial floorspace capacity at 65% plot ratio. As this is greater than the existing industrial floorspace, a total of 1,170 sqm of industrial floorspace needs to be provided for the proposals to be considered to represent “no net loss”.
140. The development proposed would deliver 2,193 sqm (GIA) B class floorspace on the lower levels of the Livesey Place building, in the part of the site which is currently SIL. Of this, 1,271 sqm (GIA) would be secured as B1(c). This is shown clearly on the submitted plans, and could be ensured through a condition. This exceeds the potential for light industrial floor space (in SIL), calculated on a 65% plot ratio, by 47 sqm (GIA). On this basis, there would be no net loss of light industrial floorspace, as defined by the draft London Plan.

would be secured by condition to ensure the functionality of the space for light industrial use, and the Section 106 Agreement would require the agreement of a workspace specification.

143. It is noted that, given their first floor location, the equipment that could be used or assembled in these 8m high spaces could only be as big as the goods lifts would allow. Plant and machinery would be limited in this respect.

Image: Section showing floor to ceiling heights for B class floor space



144. The design of the B class floor space has been carefully considered to ensure it would be useable for a wide range of light industrial/ workshop uses, and could be configured in a number of different ways depending on the needs of the tenant(s). In response to concerns raised by the GLA, the scheme has been revised to include two heavy goods lifts, more generous lobby areas and widened access doors. The lifts would be in a central location, allowing efficient access to B1c spaces in all directions. They would also be accessible from the ground floor loading bay, which would keep a safe separation between the industrial access and the other pedestrian-based residential, café and retail uses.

145. The GLA also raised concerns about the proposed column locations within the B class space. The applicant design team has made considerable effort to create B1 (c) spaces that are uninterrupted by columns as far as possible. The proposals represent a reasonable balance between creating column-free B1c space, and ensuring that the proposal is economically and structurally viable.

146. The proposed workspace specification would be as follows:

- Floor to structural soffit heights of at least 4 metres;
- Floor loading of 5.0 kN/m². This is aligned with other recently approved industrial floorspace within the Borough and entirely appropriate for B1(c) uses to use the space. Light industrial uses (without storage) generally require 2.5 kN/m². General

industrial uses such as factories and workshops are stated to be designed for 5.0 kN/m²;

- Internal loading bay to access B1(c) floorspace with two dedicated 2,000kg goods lifts;
- Floors would be finished with oil resistant and slip resistant coatings to ensure the durability of the space;
- Sound insulation would be provided where required and additional insulation can be added for noisier activities;
- A commercial extract system for noxious output can be installed as required, and all units would be fitted out with base build mechanical and engineering services, which can be upgraded as per specific tenant requirements; and
- The separating slab between commercial and residential above would be specifically designed to reduce noise transfer where required.

147. Planning conditions will also require the workspace to be fully sprinklered for fire safety purposes, and a full Mechanical and Engineering fit out. As mentioned above, a detailed workspace specification would be secured through the Section 106 Legal Agreement.

Business Relocation

148. The London Borough of Southwark is committed to business retention and relocation in the Old Kent Road Opportunity Area. However, given that the industrial units on the application site currently under consideration are currently long term vacant, there is no requirement for a relocation or retention strategy in this instance. Re-provision of the existing retail and church facility is discussed below.

Job Creation

149. As the current industrial uses on the site are vacant, there are no current industrial jobs on site. Using typical employment density calculations for B1(c) use class, these vacant industrial units could accommodate up to approximately 24 full time employees.
150. The only current employment generating use on the site is the Topps Tiles retail unit. Although a precise employment number for Topps Tiles has not been provided, using standard employment densities, the estimated figure is 18-23 Full Time Equivalent (FTE) jobs. With the proposed development in place, the applicant estimates that up to 87-109 FTE jobs (gross) would be created across all A and B class land uses proposed. This represents an estimated uplift of 69-86 actual jobs on the site, or an uplift of 45-62 potential jobs, when the typical employment density of the vacant industrial units is considered. This is a significant increase and a good regeneration benefit of the proposals under consideration, and would contribute to the draft OKR AAP target of creating an additional 10,000 jobs in the Opportunity Area. In addition, during the demolition and construction phase, it is estimated that the total average employment generated would be approximately 244 construction jobs.
151. LBS's Local Economy Team (LET) recognises that there would be uplift in employment floor space. They have set out a series of requirements in order to ensure that this development would deliver employment and training for local people. All LET recommendations would be secured through the Section 106 agreement. During the construction phase, the proposed development would be expected to provide 96 sustained jobs to unemployed Southwark residents and 96 short courses, and to take on 24 construction industry apprentices. Once the development is completed ("end phase"), it would be expected to provide 12 sustained

jobs for unemployed Southwark residents. If any of these expectations were not to be achieved, financial contributions would be sought in accordance with the Council's Planning Obligations and CIL SPD. An Employment, Skills and Business Support Plan (construction phase) and a Skills and Employment Plan (operational phase) would also be secured through the Section 106 Agreement.

Affordable Workspace

152. Draft NSP Policy 28, Affordable Workspace, states that major developments proposing 500 sqm (GIA) or more employment floorspace (B class use) must deliver at least 10% of the proposed gross new employment floorspace as affordable workspace on site at discounted market rents and secure the affordable workspace for at least 30 years at discounted market rents appropriate to the viability of the businesses targeted.
153. In the proposals under consideration, 10% of all the B Class floorspace would be safeguarded as affordable workspace. The precise location of the affordable workspace has not been defined, but would be within the B class floor space proposed on the lower floors of the Livesey Building. 10% of this space equates to 219.3 sqm. The floorspace has been offered at £17 per sq ft (with allowance for inflation), inclusive of service charge, to the user whether it is directly let by the applicant, or by an Affordable Workspace Provider. The rent to any workspace provider would be lower than the £17 per sq ft, in order to allow them to rent to end tenants for this amount. This would be determined and secured through the Section 106 negotiations. The affordable workspace would be secured as such for a period of 30 years and would be offered to existing businesses in the Old Kent Road Opportunity Area first. This allows the opportunity to collaborate with the council to identify businesses that may be nominated to occupy the space. As with all of the B class floorspace, a condition is proposed to secure a full Mechanical and Engineering fit out. The Section 106 would also secure an Affordable Workspace specification, to ensure that it would meet local demand.

Specialist Workspace Provider

154. The employment space has been designed to be flexible so that it could accommodate a range of different unit sizes and shared workspaces. The applicant team has confirmed that they have met with two workspace providers in the course of preparing this application, in order to better understand their needs and requirements. An operator has not yet been selected for the proposed workspace however. This can be secured through a section 106 planning obligation.

Agent of Change

155. The co-location of residential uses with industrial uses should include appropriate design mitigation of the residential elements to ensure that the industrial activities are not compromised, on "agent of change" principles.
156. It is considered that the proposed development would integrate well with new businesses moving in. The position of residential uses at first floor and above would go some way to ensuring that any noise nuisance would be mitigated for example. In addition, the separating slab between commercial and residential above would be specifically designed to reduce noise transfer.

Assessment of Main Town Centre Uses

157. The site is not currently within a designated Town Centre. It does however fall within the boundary of the new Town Centre proposed in emerging policy in the draft New Southwark Plan (under Policy P30, Town and Local Centres) and draft OKR AAP. In the AAP Consultation Summary, published in January 2019, this was updated to show two new designated Town Centres. Given the direction of the draft London Plan, these are likely to be “District Centres”.
158. Two new designated centres are proposed in the emerging plan in order to better meet the needs of existing and new residents and workers in the Old Kent Road area. The new centres would include retail, leisure, entertainment and recreation facilities in a significantly more attractive and accessible environment. The proposals under consideration here would help to contribute to the vitality and viability of the new centre within which they would sit.
159. Acknowledging its limited weight, draft NSP Policy P30 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.
160. The existing retail (A1 use class) offer on the site is Topps Tiles, which has a floor area of 413 sqm (GIA). This would be replaced with 572 sqm (GIA) of new retail floor space (Use Classes A1-A4). This is a clear uplift in retail provision on the site. The new retail would also consist of smaller scale units, offering the potential for more variety and flexibility, and moving away from the ‘retail warehouse’ type of development that is currently found on the site. This is a clear benefit of the proposals under consideration, and would contribute well to the vision for the Old Kent Road area. Public toilets, public drinking fountains and public seating would all be provided within the new public park that is proposed in the draft AAP and other recently approved schemes (subject to Section 106 and Mayoral/Secretary of State referral).
161. In terms of the allocation sites identified in the draft NSP, the application site is found within NSP 65. The NSP states that development here should provide new homes, retail, community uses, employment floorspace as well as strategic public open space including a new park. In addition, it states that development should reinforce the high street and provide a new part of the town centre.
162. 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. Furthermore Policy AAP7 of the Draft OKR AAP notes that generally within the Old Kent Road (not just in Town Centres) development should seek to increase both the

quantum and types of retail, provide a mix of sizes of unit and provide a range of leisure and food and drink uses.

163. The site is within the OKR 10 site allocation in the draft OKR AAP, which seeks a range of retail and other uses on sites across the designated site.
164. The Southwark Retail Study 2015 and the 2018 Old Kent Road update provide a robust and credible evidence base to inform the council's work on the NSP and AAP. This identified that Old Kent Road is the dominant destination for comparison shopping in the borough, and the proposal to introduce new designated centres supports future capacity and growth. In addition to the replacement of existing retail uses, e.g. food supermarkets and bulky goods stores in the Old Kent Road, new premises have the opportunity to establish linear high street frontages. The report also recommends that new types of retail provision could be expanded and there is an opportunity for new sectors that are currently poorly presented, e.g. fashion and food and beverage. The proposal under consideration here could contribute well to this objective.
165. 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. Noting however, that the site doesn't sit within a currently designated town centre, the NPPF, London Plan and Strategic Policy 3 of the Core Strategy, all require applications for "Town Centre" uses over a certain size, outside defined Town Centres to undertake a sequential approach to site selection, demonstrating that there would be no unacceptable impacts to any defined town centres.
166. The NPPF states that when assessing applications for retail, leisure and office development outside 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 should be 2,500 sqm. Southwark has no adopted local threshold.
167. The proposals under consideration would incorporate a mix of residential, commercial and community uses. The non-residential uses would be concentrated on the lower floors of the proposed buildings, where they would contribute to the creation of a vibrant and animated place. A breakdown of non residential land uses proposed is set out in detail elsewhere in this report, but to summarise it consists of 4,251sqm (GIA) of non residential floor space. 1,557 sqm of this would be church use (D1), which would not fall within the NPPF or draft London Plan definitions of town centre uses. 2,193 sqm would be B class use, with 1,271 sqm of this designated as B1(c) light industrial use, which again would not fall within the NPPF or draft London Plan definition of town centre uses. The remaining 922 sqm B class floor space would be flexible, for either more B1 (c) or B1(a) office space. Even if all of this were to be delivered as office space, along with the 572 sqm retail, the maximum potential town centre uses would be 1,387 sqm (GIA). This falls comfortably below the 2,500 sqm threshold set in the NPPF and draft London Plan. As such, and given the direction of travel in the emerging NSP and OKR AAP, it is not considered that a sequential test is necessary in this instance, and the retail uses proposed are supported.
168. The maximum 1,421 sqm of Town Centre uses proposed would be complementary to the delivery of the major components in the scheme, which are housing, light industrial floor space and a replacement church facility. They would activate the ground floor frontages, particularly onto the park, Livesey Place and the Old Kent Road. The scale and flexibility of

the uses proposed means that they would be subservient to the adjoining large scale town centre uses to the north and complement rather than compete with them. It is therefore considered that the proposed scheme would not create adverse impacts for the wider area or any other defined town centre.

169. The provision of this floor space would also contribute to the uplift in employment discussed above, which would further intensify the contribution of the proposal to the local economy.
170. In order to ensure that there would not be an over-dominance of Class A4 (drinking establishments), it is felt appropriate to attach a condition to the draft decision notice to ensure that no more than 25% of the commercial uses should be used for Class A4 (drinking establishments). This is to ensure there would be an acceptable mix of uses provided on the ground floor, and in the interests of protecting neighbouring residential amenity. Conditions to control opening hours for the Class A3 (cafes and restaurants) and Class A4 (drinking establishments) uses are also included on the draft decision notice.

Independent Retail

171. 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. The floor plans proposed clearly show that this would be the cases, with the retail use split up to provide discreet units fronting onto the new linear park, Livesey Mews and Old Kent Road. The Legal Agreement will also require the submission and approval of a Retail Marketing Strategy to ensure that local independent businesses are targeted first.

Offices

172. The proposals would provide up to a maximum of 922 sqm (GIA) of B1a offices. Flexible land use designation has been applied for here, so some or all of it could also be used as B1 (c). This potential office use would not generate any adverse effect on established office locations in the borough such as Bankside, Borough and London Bridge and would help to deliver new jobs for Old Kent Road and would add positively to the range of workspace types available in the area. It would be consistent with the emerging policy position, including the potential designation as a District Centre. On this basis, the potential for some office use is supported.

Replacement Church Facility (D1 Use Class, Place of Worship)

173. London Plan Policy 3.1 states that development proposals should protect and enhance facilities and services that meet the needs of particular groups and communities. London Plan Policy 3.16 seeks additional and enhanced social infrastructure provision to meet the needs of a growing and diverse population. Draft London Plan Policy S1 supports the provision of high quality inclusive social infrastructure
174. Core Strategy Strategic Policy 4 states that there will be a wide range of well used community facilities that provide space for many different communities and activities in accessible areas. Saved Policy 2.1 of the Southwark Plan encourages the retention of D class community uses and Saved Policy 2.2 of the Southwark Plan states that planning permission will be granted for new community facilities provided that provision is made to enable the facility to be used by all members of the community, it will not cause harm to amenity and a Transport Assessment is submitted.

175. The former North Peckham Civic Centre is currently used as a place of worship by the Everlasting Arms Ministries. The proposals would provide a new church facility of 1,558 sqm (GIA) designed to meet the needs of The Everlasting Arms Ministries. It is understood that the applicant is committed to working with the Pastor to identify temporary relocation opportunities during the demolition and construction period.
176. The Everlasting Arms Ministries Church currently has a capacity for 418 persons. The building comprises of lower ground, ground, first, second and third floors with parking for some 18 vehicles provided in a yard to the rear and underneath the building. The church currently holds two key weekly services, and two monthly services. There 22 members of staff associated with the church, although for much of the week, staff presence is minimal.

Table: Summary of current church services

Summary of Services at Everlasting Arms Ministries				
Day of the week	Occurrence	Time	Event	No. of attendees
Wednesday	Weekly	7-9pm	Weekly church service	25 adults
Friday	3rd Friday of every month	10.30pm-3am	Church night vigil	40 adults
Saturday	1st Saturday of every month	10am-2pm	Church special service	30 children 115 adults
Sunday	Weekly	9am-1:30pm	Weekly church service	45 children 130 adults

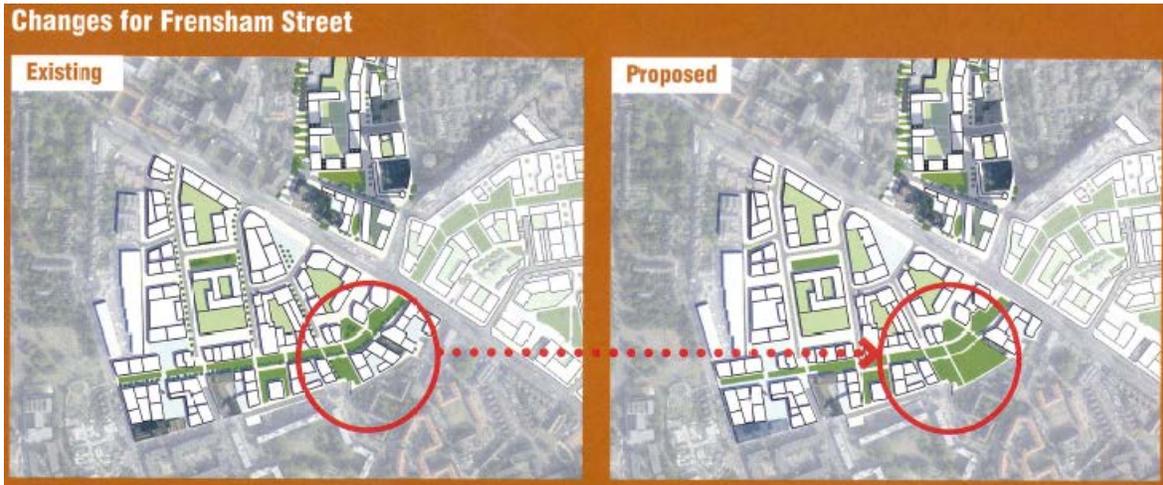
177. The proposed church would be arranged over ground, first and second floors, accessed via a new entrance from Peckham Park Road. The main church hall at the first floor level would provide approximately 400 seats together with ancillary space, whilst the second floor will provide a gallery to the main church hall with capacity for a further approximately 160 seats. A second smaller hall is also proposed on the second floor plan, which would accommodate approximately 70 people. All three levels would contain pre-function atrium space. The Peckham Park Road public realm has been designed to incorporate a defensible gathering space at the base of the building.
178. The shared loading bay has been designed to enable temporary parking and pick-up/drop-off facilities for the church (3 short stay spaces), to coincide with functions, typically occurring outside of peak hours at the weekend, therefore avoiding potential conflict with servicing of the employment or retail uses. A refuse store for the church is proposed adjacent to the church entrance lobby, and 1 blue badge car parking space is proposed for use by the church. Access to these facilities would be controlled via an intercom to the concierge of the building.
179. It is also recommended that the Section 106 agreement should secure a community use plan for the church, to ensure that it is opened up to the wider community when appropriate. This will ensure some flexibility, and allow for the facility to be shared by many different groups, in line with the Southwark Core Strategy and Saved Southwark Plan policies.

180. The applicant has confirmed that The Everlasting Arms Ministries Church would get a 999 year lease back of the new church. As required by the GLA, they are working with the church to find temporary accommodation, as appropriate during demolition and construction. In order to secure this, a Church Relocation Strategy will be secured through the Section 106 Legal Agreement.
181. The re-provision of the church facility is considered a positive aspect of the scheme of particular benefit to the existing community. Consideration of this in relation to the Public Sector Equalities Duties is set out in the relevant section of this report.

Provision of a New Park

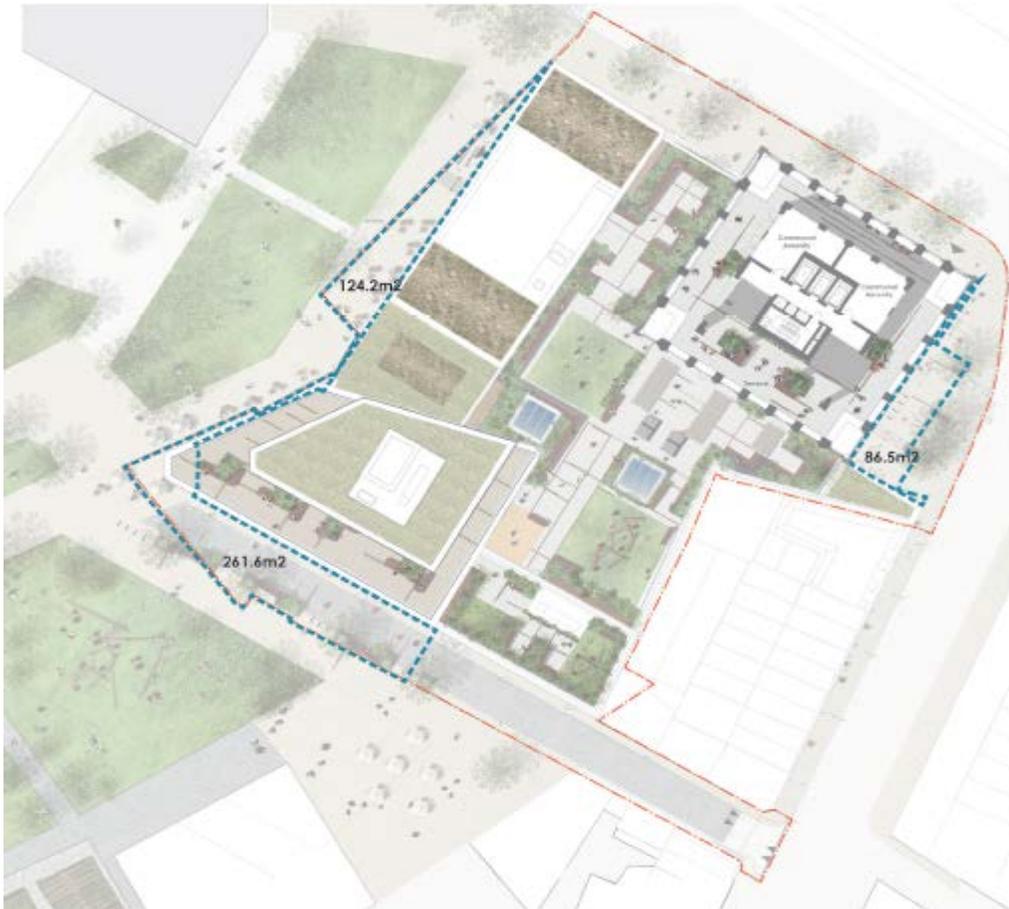
182. In line with the requirements of the draft OKR AAP, the development would make a small contribution of land to the new Linear Park envisaged in the draft AAP, including the immediately adjacent Frensham Street Park, proposed on the site of the current council depot. The building has been designed to address the park, providing active vibrant frontages onto it, particularly at ground floor. Livesey Place would be landscaped to make an attractive and characterful contribution to the park. The landscape proposals would be capable of linking well with the linear park proposed as part of the recently approved (subject to Section 106 and referral to the Mayor/Secretary of State) schemes at Nye's Wharf, Cantium Retail Park and Malt Street. This would provide a continuous route along these three separate sites. In order to ensure consistency along the Linear Park, the landscape proposals for this development need to be carefully coordinated with those of the neighbouring sites. There have been a number of meetings with adjoining landowners to ensure that this is the case, and the council is currently producing a public realm guidance strategy.
183. As referenced above, one of the changes being made to the draft OKR AAP, and published in the Consultation Summary of January 2019, is the addition of the proposed Frensham Street Park to the draft masterplan. This will create a south facing park, approximately the same size as Bird in the Bush Park (1.5 hectares) on the council's Frensham Street depot site. The design and use of the park will be developed with the local community. This additional park space would adjoin the linear park proposed in the draft AAP, and would be directly adjacent to the application site under consideration here. The open space and play space financial contributions that would be secured should the proposals under consideration be granted planning permission (set out in full detail in the section of this report on Outdoor Amenity and Play Space), would go directly towards the creation of the Frensham Street Park. A contribution towards maintenance of the Frensham Street Park, shared by all developers who own land in the Linear Park, including the applicant, will also be secured in the Section 106 Agreement.

Image: Proposed changes to the Frensham Street site in the draft OKR AAP



184. For road safety reasons, the application site cannot be serviced from the Old Kent Road or Peckham Park Road. Also, for road safety reasons, given its proximity to the junction of Peckham Park Road and the Old Kent Road, Livesey Place can not be accessed by a right-turn in. Two way movements in Livesey Place would also be very difficult due to its narrow width. As a result, and as set out in the draft Old Kent Road AAP, the intention has always been for this site to be serviced through the Frensham Street site. This was integrated into the previous draft AAP masterplan, through the development of the Frensham Street site with mixed use buildings, roads and public open spaces. Now that the Frensham Street Park has been proposed, a road to serve the application site would still be required. However, as it would only be necessary to serve the proposed development, it has been agreed that the applicant would cover the cost of this road. The Council has commissioned a break down of the estimated costs of delivering the Frensham Street Park. The estimated figure for the delivery of the road is £193,000. It is however, important to note that this is only an estimate, and the final costs will be subject to detailed design and specification.
185. The delivery of the land required to contribute to the linear park, including Livesey Place would be secured as part of the Section 106 agreement. This would secure the timing of the delivery of these spaces, access by foot and by bicycle and sustainable drainage. The detailed design of the landscape proposals would be reserved by condition.

Image: Public open space proposed in relation to indicative drawings of the Frensham Street Park and Liner Park



186. The Section 106 agreement would also include clauses relating to maintenance, including maintenance related to the council’s Frensham Street Park. At a future date to be agreed with the Council the landowners will use reasonable endeavours to liaise with each other and establish a shared single management approach for the linear park, similar to the Nine Elms Model in Vauxhall, with details to be secured by the legal agreement. The applicant has agreed to this approach.

Provision of Housing, Including Affordable Housing

187. The scheme would deliver 372 new homes, including policy compliant affordable housing (35% by habitable room). This is a significant positive aspect of the scheme. There is a pressing need for housing in the borough. Policy 3.3 of the London Plan supports the provision of a range of housing and sets the borough a target of 27,362 new homes between 2015 and 2025. This is reinforced through Strategic Policy 5 of the Core Strategy and emerging policy in the draft new London Plan, NSP and draft OKR AAP.

Prematurity

188. 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.

189. Refusal of planning permission on grounds of prematurity would 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.”
190. The most up to date adopted development plan document pertinent to the Old Kent Road is the 2016 London Plan. This identifies the Old Kent Road Opportunity Area as having significant potential for housing led growth. The draft 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 draft New London Plan aspirations for industrial land and employment are addressed. The scheme under consideration here 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 NSP and the 2016 and 2017 draft OKR AAPs and the 2018 draft New London Plan. It is not therefore considered to be premature.

Conclusion on Land Use

191. The scheme would deliver major regeneration benefits, including a significant contribution to the borough’s housing stock, a policy compliant level of affordable housing, job creation, good quality, flexible light industrial space and office space (including 10% affordable workspace), high quality retail space, a re-provided church and contribution to the provision of a new Linear Park (including Frensham Street Park). These benefits must be weighed against the fact that the proposals would be contrary to Strategic Policy 10 of the Core Strategy and Saved Policy 1.2 of the Southwark Plan owing to the introduction of retail, residential and D class floorspace in protected industrial land. It is recommended that the benefits would outweigh any harm, particularly given that there would be full re-provision of industrial floor space, and therefore, the principle of the proposed development in land use terms should be supported.
192. In relation to town centre uses, whilst the proposed development would introduce main town centre uses outside a currently designated town centre, the proposals would fall below the threshold set out in the NPPF, and would not be to the detriment of other designated centres. In addition, they would also help deliver the draft OKR AAP’s aspirations to create

two new designated centres in Old Kent Road. Together, the mix of uses proposed would help to create a vibrant, genuine mixed use neighbourhood.

AFFORDABLE HOUSING AND DEVELOPMENT VIABILITY

Affordable Housing

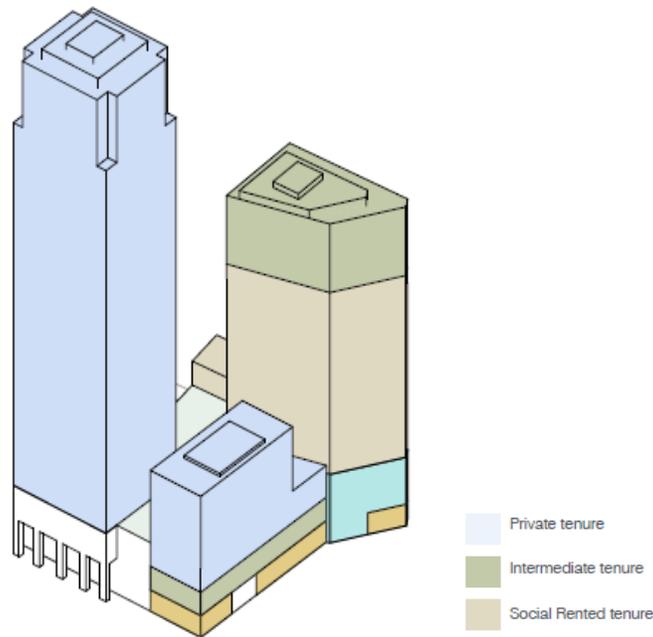
193. In summary, the proposed scheme would deliver 115 affordable homes to the borough's housing stock. When calculated as habitable rooms, this represents a policy compliant 35% affordable housing offer. In line with draft New Southwark Plan Policy P1, 25.8% of the all proposed habitable rooms would be for social rent (at least 25% is required by policy), and 9.2% would intermediate.
194. Southwark Plan Saved Policy 4.4 requires at least 35% of all new housing to be provided 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. Emerging New Southwark Plan Policy P1 sets a requirement for a minimum of 25% of all the housing to be provided as social rented and a minimum of 10% intermediate housing to be provided, this equates to 71.5% social housing and 28.5% intermediate housing.
195. 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 draft 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.
196. In accordance with the council's Affordable Housing SPD, rooms that are over 27.5sqm have been counted twice for the purposes of calculating affordable housing. This accounts for large open plan living room spaces that include kitchens and dining areas.
197. In total, 1200 habitable rooms would be provided. 420 of these would be affordable habitable rooms, which would equate to an overall provision of exactly 35% and is therefore fully policy compliant and a very positive aspect of the scheme. Viability information has been submitted which supports the delivery of the quantum of affordable housing proposed.
198. With regard to tenure split, out of the total 1,200 habitable rooms, 310 would be social rented (25.8%) and 110 would be intermediate (9.2%). This exceeds the requirement for 25% of homes to be social rented.

Table: Tenure Split

Tenure	Habitable Rooms		Units	
	No.	%	No.	%
Private	780	65%	257	69.1%
Social rented	310	25.8%	83	22.3%
Intermediate	110	9.2%	32	8.6%
Total	1,200		372	

199. All 83 social rented homes would be delivered in the Livesey Building, with views over the proposed park. 25 of the intermediate homes would be delivered in the Livesey Building, and seven in the Topps Building. 212 of the private homes would be delivered in the Civic Tower, and 45 in the Topps building. This is summarised in the diagram below.

Image: Proposed tenure mix across the three residential buildings



200. The Section 106 Legal Agreement would secure the delivery of these units, including clauses to prevent the occupation of more than 50% of the private apartments until 50% of the affordable units are completed in any phase, and a clause to prevent more than 90% of the private sale apartments being occupied in any one phase across until affordable housing of that phase is complete. 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. However, it should be stressed that the overall quantum of 35% would remain as the minimum level of affordable housing provision. The review mechanism would capture any increase should the development be able to support it. No late stage review has been secured, as there would be no net loss of industrial floor space and the affordable housing offer meets the 35% policy compliant level.

201. As with all Old Kent Road schemes, service charge costs to social rent tenants would be capped within social rent cap levels. This would be required in the Section 106 and confirmed when a registered social landlord is on board.
202. A contribution of £15,220.25 (a charge of £132.35 per affordable home) has been agreed towards affordable housing monitoring and maintained provision of these units, and would be secured by the legal agreement.

Development Viability

203. Southwark's Development Viability SPD requires a Financial Viability Appraisal (FVA) to be submitted for all planning applications which trigger a requirement to provide affordable housing. The FVA should identify the maximum level of affordable housing that can be sustained and justify any proposed departures from planning policy requirements.
204. This application is therefore accompanied by a FVA, which was reviewed by independent consultants on behalf of the council. An addendum report was also received from the applicant during the course of the application, which provided clarification on a number of points raised by the independent consultant, and responded to revisions to the scheme, including raising the level of affordable housing from 32% to 35% (by habitable rooms) and a 10% affordable workspace offer.
205. Despite some variances in relation to the inputs used, both consultants conclude that the application scheme would produce a return below the target rate of return (profit on GDV) and therefore the maximum reasonable affordable housing provision has been proposed.
206. In the addendum to their FVA, the applicant proposes a blended rate of return on a present day basis of 17.94% profit on GDV. The independent viability review undertaken on behalf of the council effectively makes no fixed allowance for developer profit, but states that if profit were targeted at a blended rate of 16.16%, which the Council's consultants consider reasonable, this would increase the overall deficit identified.
207. The FVA addendum sets out sensitivity analysis on the viability of the proposals, to demonstrate the changes in sales values and construction costs that would be required to make the scheme viable. This sensitivity analysis indicates that the proposals could potentially become viable (with a policy compliant level of affordable housing) with growth of +10.06% per annum, and a reduction in costs of -10%. Adopting the independent consultant's assumptions, growth of 10.6% would be required to make the scheme viable.
208. The site would benefit from the wider regeneration of the area, including the Bakerloo Line Extension, which would boost sales and have a major impact on the area. Consultation on the BLE has been undertaken and is ongoing and construction could start in 2023 and thus the scheme would be likely to directly benefit from increases in residential pricing in the longer term.
209. The sensitivity analysis also considered the possibility of increasing the level of affordable housing to 40% by accessing GLA housing grant. After careful consideration, including working meetings with the GLA, the applicant decided not to pursue this for the following reasons:

- The move to 40% would further reduce the financial performance of the scheme, increasing the risk that viability would not be achieved within the 3-year life of the consent to allow implementation;
- The present configuration of the proposed tenure mix avoids any potential service charge conflicts. Any alterations to the tenure mix would be likely to compromise this; and
- Tower schemes commit developers (both private developers and registered providers) to higher levels of risk because of the inability to break schemes into smaller phases.

Conclusion on Affordable Housing

210. In conclusion, the level of affordable housing proposed is a very positive aspect of the proposals. The scheme would deliver 35% affordable housing overall, which could become viable with sales values increasing over time. The 35% affordable housing offer is therefore considered deliverable on this basis and terms to secure the affordable housing would be included in the legal agreement, together with an early stage review mechanism.

DESIGN CONSIDERATIONS

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

Site Layout

213. The proposed site layout would comprise one single urban block, with three distinct residential buildings (referred to as the Civic Tower, Livesey Building and Topps Building) on top of a three to four storey podium. There would be shared external amenity space on top of the podium at third floor level, and roof gardens at fifth and 24th floor in the Livesey Building and on the 38th floor of the Civic Tower.

- 214. The non residential uses would be distributed within the podium. The re-provided church would be located on the corner of Old Kent Road and Peckham Park Road. New retail/cafe units would front onto Old Kent Road and the new linear park proposed in the draft OKR AAP. New B class workspace would overlooking Livesey Mews (currently Livesey Place) which would be extended to lead into the new linear park
- 215. The total amount of public realm at ground floor would be 472.3sqm. This would take the form of a contribution to the new linear park, an extension to Livesey Mews and small public square at the base of the Civic Tower, outside the entrance to the church on the corner of Old Kent Road and Peckham Park Road. The latter would help create a civic presence for the church entrance and accommodate the congregation before and after services.
- 216. Livesey Mews would also form the edge of the new Frensham Street park. It would be partly vehicular and partly pedestrianised. The pedestrianised area would produce small scale public space that would visually link Peckham Park Road to the linear park. The design would allow for seating and planted areas and the potential for a historical link with the retention of existing cobbles.

Image: The Council's emerging proposals for Frensham Street Park



- 217. The ground floor layout would be outward-looking, with active frontages along Old Kent Road, Peckham Park Road, and Livesey Mews. The existing buildings on the site do not currently provide successful active frontages or overlooking of the street, so this represents a major benefit of the scheme under consideration.

218. The new linear park would be addressed by an extensive retail frontage with opportunities for sitting out. The Old Kent Road frontage would be significantly improved with the introduction of a new colonnade that would create a wider footway and a grander civic presence on this key junction. This space would also accommodate the Grade II listed mural from the existing Civic Centre. The design of the ground floor frontage along Old Kent Road would also contribute to the reinstatement of a high street character of the area, as envisaged in the draft OKR AAP. The Peckham Park Road frontage would provide a legible, generously proportioned entrance to the church. The Livesey Mews frontage would be activated as far as possible with a café space and residential lobby. This would however also be the location of the service entrance to the proposed development. As it could not be serviced from Old Kent Road, Peckham Park Road or the proposed linear park, this is the only location from which the site could be serviced. Generally, service access would be accommodated in a discreet manner.
219. The result of the ground floor design would be a variety of street character throughout the development, with appropriate levels of activity on each edge of the urban block. A condition requiring a shop front design strategy is recommended to ensure that all necessary details, including signage and lighting, are considered and delivered in a high quality manner.
220. In addition to the new public realm and active frontages, the proposed site layout would also increase connectivity and permeability in the area. At present, Livesey Place is a dead-end street dominated by parked cars. It presents a particularly hostile environment for pedestrians. As mentioned above, the proposed layout would open up Livesey Place and extend it into the new linear park. The existing cobbles that are found on Livesey Place today would be retained, as will be required by the public realm strategy that the council are currently producing and a condition on this consent. In addition, additional pedestrian permeability would also be created with the addition of the route alongside the new linear park. There is a change of level to be addressed here, but full accessibility will be designed across the new linear park. This has been designed with full and careful consideration of other emerging development proposals on neighbouring sites, and will be informed by the emerging public realm guidance. TEST

Height Scale and Massing (including consideration of Tall Buildings)

Image: The proposals, viewed from Old Kent Road



221. The heights of the three buildings (including the three - four storey podium) would range from ground plus nine storeys at the Topps Building, to ground plus 24 storeys at the Livesey Building and ground plus 38 storeys at the Civic Tower. Their distribution across the site has been well considered in order to ensure breaks in the massing that would allow natural light into and views out of the open space on top of the podium. The buildings would also be located and oriented to achieve appropriate privacy and outlook between adjacent homes. This is discussed in further detail elsewhere in this report.
222. The proposed massing strategy places the tallest building, the Civic Tower on the northeast corner of the block, marking the junction of Old Kent Road, Peckham Park Road and Rotherhithe New Road, the location of the entrance to the new linear park and the significant public function of the new church. It would be ground plus 38 storeys (+142.80m AOD). The other two buildings would also be tall buildings according to the Saved Southwark Plan definition, being over 30m in height. The second tallest would be the Livesey Building, which would be ground plus 24 storeys (+93.95m AOD). This is proposed at the corner of the new linear park and Livesey Mews which would be a very prominent location in the context of the new linear park. The distinctive 'prow' of the Livesey Building would be visible at the change in direction of the park as it turns towards Old Kent Road.

Image: The Livesey Building from the Linear Park, showing the distinctive 'prow'

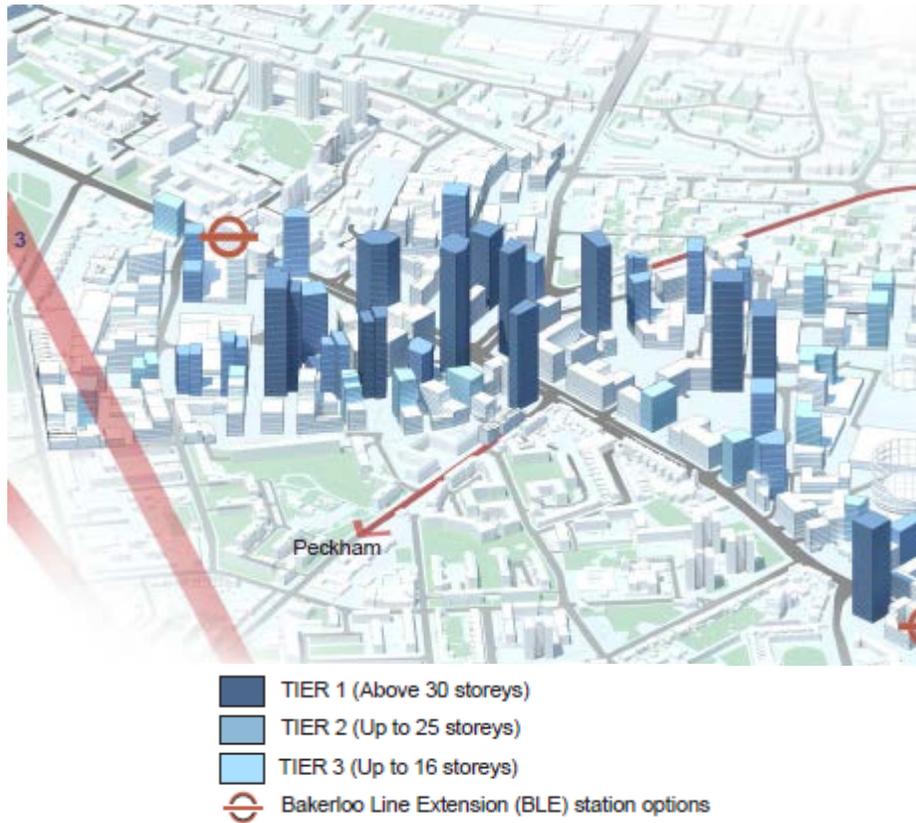


223. The Topps Building would be ground plus nine storeys, (+41.55m AOD) in height, and located facing the new linear park and Cantium retail park development to the west.

Draft OKR AAP

224. The draft OKR AAP clearly proposes a Tier 1 tall building (above 30 storeys) on the corner of the site, marking the junction at the heart of the proposed 'Stations and Crossing' Strategy. In the draft AAP, this junction is described as the "principle crossing in the city structure where the main roads from Peckham to Canada Water and from Walworth to Bermondsey cross the Old Kent Road". The application site is also described as "the point where the new Surrey Canal park [the linear park] crosses Old Kent Road".
225. The draft AAP proposed a Tier 3 tall building (up to 16 storeys) in the location of the Livesey Building. At ground plus 24 storeys, the building now proposed in this location would exceed this definition. However, the draft AAP strategy was designed with the development of the neighbouring Frensham Street site in mind, and heights were restricted in order to ensure good neighbourly relationships. Since then, it has been decided that the Frensham Street site should become a new public park rather than being built on. This not only removes the need to consider the neighbourliness of the Livesey Building, but also gives this part of the site much greater landmark presence, as it is now the site of the junction between the linear park and Frensham Street Park. In light of this, a Tier 2 tall building, such as that proposed, is considered appropriate. The two tallest buildings have been arranged to allow for as much space between them as possible, ensuring that they would not appear to coalesce when viewed from a distance. This also ensures that good levels of sunlight and daylight would reach the public realm. The Livesey Place building would be to the north of the new Frensham Street Park and therefore not result in any harmful overshadowing. The relative heights and the way in which they would be distributed across the site would result in a well-articulated composition of towers defining the new public realm and serving an important landmark role identifying a junction of city-wide importance, the entrance to the linear park and the new Frensham Street Park.

Image: The 'Stations and Crossings Strategy in the draft OKR AAP



226. In line with the draft OKR AAP, the design of the tall buildings would be exemplary, with careful consideration of their impact on the skyline. The Civic Tower would have a strong vertical emphasis, which would contrast with the horizontal emphasis proposed for the Livesey Building. This contrast is intended to ensure that the two tall buildings wouldn't visually coalesce in long distance views. Furthermore, all three tall buildings would have well defined bases, middles and tops and well considered fenestration, rhythm and detailing. This is discussed in greater detail below.

London Plan (2016)

227. As the development would be substantially taller than its existing surroundings, it would be defined as a tall building in the adopted London Plan (2016). Policy 7.7 of the 2016 London Plan, 'Location and Design of Tall and Large Buildings', states that tall buildings should be limited to sites in the Central Activity Zone, Opportunity Areas, areas of intensification or town centres that have good access to public transport. Furthermore, London Plan Policy 2.13 requires development in Opportunity Areas to optimise residential and non residential output densities, meet or exceed minimum housing and employment guidelines and support wider regeneration objectives. Annexe 1 of the 2016 London Plan sets out the specific requirements for the Old Kent Road Opportunity Area, identifying it as having significant potential for residential-led redevelopment. As such, 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.

228. This policy also states that the impact of tall buildings in sensitive locations, including the settings of conservation areas and listed buildings should be given particular consideration. Although the proposed development is not within a conservation area, it is important to note that, given the heights of the buildings proposed, they would be visible from a number of sensitive locations. The specific impact of the proposed development on these sensitive settings, and the wider townscape context is assessed in more detail below where the submitted Townscape and Visual Impact Analysis (TVIA) is considered.

229. As required by the London Plan, 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 it is not generally considered sensitive to change of this type. The south side of the Old Kent Road is dominated by retail parks and supermarkets, with limited active frontages and poor urban streetscapes. The 'big box retail shed' nature of the existing townscape is not considered 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.

230. The proposed tall buildings would relate well to their surroundings, particularly at street level. The new urban block would create active frontages that are sensitive to the unique character of each edge, increased connectivity and permeability and contribute to the creation of a series of new public open spaces. The retail and D1 uses proposed along the Old Kent Road itself would contribute to the 'high street' character envisaged in the draft AAP. The urban grain of the surrounding area would be enhanced as the site would be better stitched into existing and proposed streets and open spaces. The sensitively detailed architectural design of the towers (discussed in further detail below) would respond sympathetically to the existing local townscape, whilst introducing a new high quality aesthetic.

231. As a group, the proposed tall buildings would improve the legibility of the area by signifying

the principle crossing of the Old Kent Road, the entrance to the proposed linear park, the new Frensham Street Park and new public uses including the replacement church and retail destination use. Given its strategic location within London's road network, the application site is already considered to be at a point of geographical significance. The new parks and public uses would also give it an important civic function. The design proposed would enhance the skyline and image of London with the three tall buildings forming a well considered composition of varying heights, striking facades and high quality materiality. The well defined 'tops' of the buildings, particularly the Civic Tower, would create a visually engaging silhouette.

232. 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.
233. The positive nature of the ground floor activities proposed, their relationship to the surrounding streets and the increased permeability proposed would all represent significant public benefits. The proposed development would not incorporate any publicly accessible areas on the upper floors, but is noted, that the London Plan (2016) only requires this "where appropriate". There would be amenity space for residents on the upper floors, including external roof terraces and internal communal amenity rooms. The roof terraces would also be well landscaped so as to contribute to a layer of green articulation to the buildings.
234. As discussed elsewhere in this report, the proposals under consideration would deliver significant contributions to local regeneration. This would include the delivery of housing (including affordable housing), new employment floor space (including affordable workspace), new retail/café spaces, a replacement church facility and contributions to new strategic public realm such as the proposed linear park.
235. The impact of the proposed development on microclimate, wind turbulence, overshadowing, noise, solar glare, aviation, navigation and telecommunication interference is all assessed in the submitted ES and presented elsewhere in this report. In each case it is concluded that there would be some impacts, particularly in relation to daylight. In the majority of cases however, there would be no significant adverse impacts. Please see the relevant section of this report for more detail.
236. Finally, it is also considered that there would be no unjustifiably harmful impact on local or strategic views, although as identified below there would be a small number of sensitive locations from which this needs a carefully balanced decision.
237. The draft New London Plan takes a similar tall building policy approach, identifying the Central Activities Zone and Opportunity Areas as suitable locations for tall buildings and setting out similar criteria against which tall buildings should be assessed. It does place a greater emphasis on design review which is discussed later in the report.

Southwark Plan

238. As the most recently adopted document in the Local Plan, and the only document adopted after the Old Kent Road was designated as an Opportunity Area with significant potential for residential-led redevelopment, it is considered that these London Plan (2016) policies in relation to tall buildings are more relevant than 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.

239. Despite almost full site coverage, the proposed development would still make a very positive contribution to the landscape in the area two main ways. Firstly, as set out in the section of this report on Outdoor Amenity Space, the applicant would make a substantial financial contribution to the delivery of new public realm and play space. This would go directly towards the creation of the new Frensham Street Park adjacent to the application site. Secondly, where new public realm would be created within the red line boundary, it is well considered and would make very positive enhancements to existing conditions. This includes an important contribution to the new linear park, the widening of the Old Kent Road footway and the creation of a new, small public square outside the church entrance on Peckham Park Road. By adding this generosity to the existing public realm of Old Kent Road and Peckham Park Road, the landscape of the area would accommodate the greater numbers of people either living in or visiting the application site. The extension and enhancement of Livesey Place would also be a very positive contribution.

240. The proposed tall buildings would be located at a point of landmark significance as identified above.

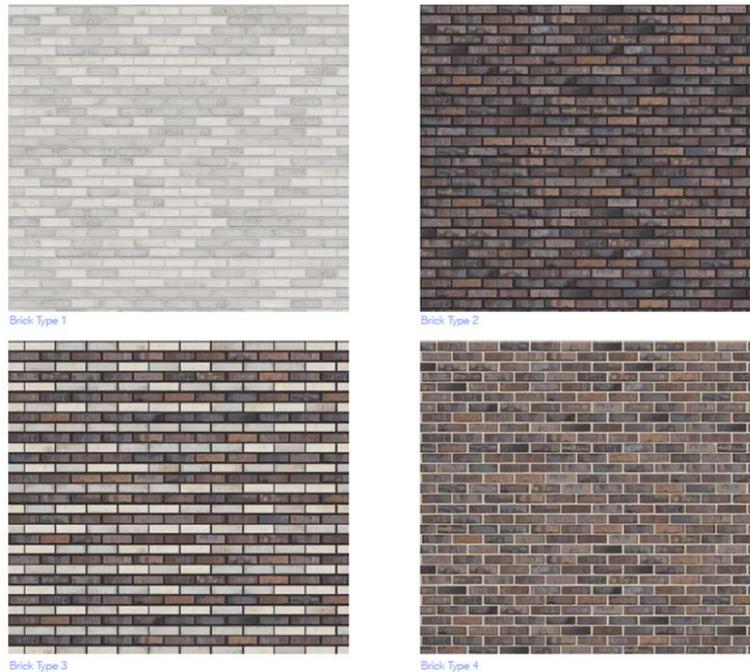
241. The proposed development would be of the highest architectural standard and, as set out above. It would also contribute positively to the London skyline, eventually as part of a cluster of tall buildings following the regeneration of the area.

Architectural Design and Materiality

242. The proposed buildings would share a common architectural language, but would be clearly distinguished from each other through subtle variation in materials, colour, architectural fenestration and detail. They would read as a family of brick buildings, each with a slightly different brick mix. The basis of the material palette is the varying application of two brick types and two mortar colours, as summarised below. This would be supported by a limited palette of other materials, including precast concrete, metallic powder coated steel, PPC aluminium window frames, render (in very limited areas) and white bricks. The predominantly masonry texture proposed would respond well to the rest of the existing buildings in the area, and the emerging proposals on other surrounding sites.

243. The material palette proposed is high quality, and in order to ensure that this is realised in the final building planning conditions requiring detailed drawings, material samples and full scale mock ups are recommended. The Section 106 Legal Agreement would also require the architect, Maccleanor Lavington, to be retained throughout the detailed design and construction phases of the project unless otherwise agreed in writing.

Image: Proposed brick palette



Civic Tower

244. The Civic Tower would consist of a clearly articulated base, middle and top. The lower three storeys that would form the base of the tower would be civic in their scale and appearance, with a colonnade onto the Old Kent Road, robust arches (strong horizontal elements held up by strong vertical elements with large spaces between them) and larger scale fenestration appropriate to the public uses within. The Grade II listed mural would be carefully removed from the existing Civic Centre prior to demolition, and reinstated at the base of the Civic Tower. This is discussed in further detail in the section of this report on Heritage Considerations, and in the accompanying report for Listed Building Consent (18/AP/3285).
245. The middle of the tower would be distinguished by white brick, vertical projecting piers which would enhance its slenderness. The middle would also be subdivided into three subtly different portions, each differentiated by increasing width of the windows and corresponding decreasing width of the piers. Window reveals and spandrels would be in dark grey brick, with the spandrel brickwork vertically coursed. All windows in the Civic Tower would be full height floor to ceiling French Doors with metal balconies.
246. The top would be characterised by notches at each corner of the tower, each equal to the width of a window bay. This would reduce the profile of the tower and provide opportunities for private terraces. The parapet at the top of the tower would be crenelated to give it a distinctive profile on the skyline.
247. At the top of the tower, there would be a communal roof terrace and two communal amenity rooms. The parapet to the roof terrace would be 800mm above the terrace floor level, while the projecting piers would extend approximately 2 metres above it. In between the piers there would be glazed screens allowing views out.

Images: Details of the Civic Tower



Livesey Building

248. The Livesey building would have a similar elevation strategy to the Civic Tower, in that it would have a distinct base, middle and top. In deliberate contrast however, the Livesey building would have a horizontal elevational emphasis, with continuous white brick bands running around the building at each floor. A continuous pre-cast concrete cill would also run along the top of the white brick bands, beneath the windows. The windows would be set within alternating banded brickwork along with inset balconies.
249. At the ground floor, the openings would be of generous proportions in order to create an appropriately grand base and address the practical considerations of the entrance to the loading bay. The large glazed openings into the cafe, residential and office entrances at ground floor would be surrounded by pre-cast concrete frames. The loading bay, substation, refuse store and bike store doors / screens / louvres would have powder coated metal decorative grilles. The first and second floor would be in employment use, so their floor to floor height would be larger than the standard floor to floor in the upper levels of the building (approximately 4.5m). Above the windows, bespoke metal perforated grilles would be integrated into the elevation to allow ventilation supply and extract ductwork to be terminated without cluttering the appearance of the building. The windows would be of a limited number of sizes and would be arranged so that they stack vertically over the full height of the building. All balconies would be fully inset and four of the five on every floor would be located on the corners of the building giving views in multiple directions. The southwest corner balcony facing over the park would cantilever from the corner of the building creating the

architectural 'prow' feature referred to above.

250. The top of the Livesey building would be distinguished by a significantly thicker brickwork band and a pre-cast concrete cornice to terminate the main elevation. There would be a glazed balustrade / screen above this. On the roof of the building would be a communal external terrace for residents and a setback pavilion containing two residential communal amenity rooms.

Images: Details of the Livesey Building



Topps Building

251. As the third building in the urban block, the Topps Building would have a third elevational strategy. The proportional emphasis would be more neutral in its emphasis, with large rectangular windows with white brick reveals. The ground floor of the Topps building would contain a residential entrance to the apartments above and a number of Retail (A1-4) units. Commensurate with this, the height of the ground floor would be increased to approximately 6 metres and large display windows would face the new linear park.
252. Inset balconies to the residential levels above would be arranged in pairs, aligned with the openings below to give a calm, and ordered effect to the overall elevation. The top floor windows would have an additional white brick panel above them to differentiate them from those in the main body of the building, and there would be parapet of substantial height with vertically coursed brickwork detailing to cap the building.
253. The brick proposed for the Topps Building would be the same dark brick as that proposed for the Civic Tower. However, in order to create a slightly lighter overall appearance, it would be paired with a lighter mortar. This would create a striking visual contrast without feeling discordant. The white brick window reveals, which would closely match the pre case window cills, would further lighten the appearance of the building. As with the Livesey Building, the window cills would be 800mm above the floor and decorative metal balustrades would provide additional detail and protection to the windows. Above the windows, decorative metal

perforated panels would allow ventilation ductwork to be terminated discreetly.

254. The roof of the Topps building would be one of the few roofs on the scheme that would not be used for residential amenity. A combination of factors, including its proximity to the Civic west facing apartment windows, and the need to accommodate the heat rejection equipment for the mechanical cooling system, resulted in this decision. This plant would be located in the middle section of the roof, hidden behind the 1,800mm tall parapets. On top of it there would be a louvered screen that would conceal it from view of the residents of the apartments above. At either end of the roof a natural brown roof meadow would be created.

Images: Details of the Topps Building



Landscaping

255. Five main landscaping strategies are proposed, in response to different conditions across the application site, as follows:
- 1) The existing streets would be re-organised and enhanced with wider footways, street furniture and tree planting, particularly along the Old Kent Road, Peckham Park Road and the extended Livesey Mews; and
 - 2) A small new public square or plaza would be created on Peckham Park Road to provide a comfortable gathering place immediately in front of the church entrance; and
 - 3) The extended Livesey Mews would be designed as a small scale public space with distinctive character of its own, retaining the existing cobbles and visually linking Peckham Park Road to the proposed Linear Park; and
 - 4) Podium rooftop communal gardens would be integrated into the design of the building at third and fifth floor; and

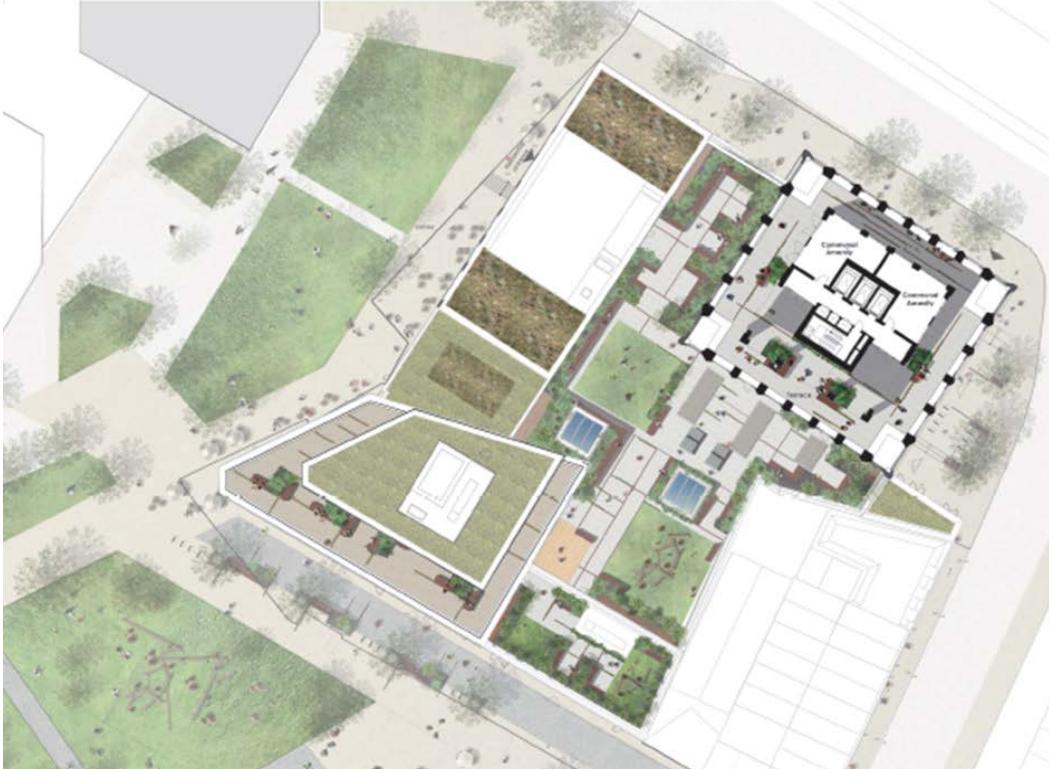
- 5) Rooftop terraces would be created on the Livesey Building and Civic Tower, at 24th and 38th floor respectively.

256. The proposed enhancements to existing streets would include new paving, cycle stands and new street trees in front of the proposed Civic Tower, and along the Old Kent Road, wrapping around the building to the public space at Peckham Park Road. These proposals should be treated as indicative at this stage, with detail to be agreed through the Section 278 process with both London Borough of Southwark and TfL. The principles established in this indicative material will be secured, as well as the requirement to enter into Section 278 agreements would be secured through the Section 106 Legal Agreement. In response to consultation with TfL, the proposals allow for broader footways, wider crossings and dedicated cycle lanes to improve the safety and accessibility of the highways use.
257. Along Peckham Park Road, the high quality surface materials proposed on the Old Kent Road would continue, with an extended public realm providing level access to a generous public plaza and gathering space immediately in front of the church. The gathering space would be emphasised by a line of softer, Silver Birch trees and brick seating plinths set perpendicular to the pavement. Again, the details should be considered indicative and subject to Section 278 agreement. The gathering place would announce the church entrance, provide breakout space to accommodate the congregation before and after services and enhance the civic nature of this part of the proposals. The materiality here and on Old Kent Road would be robust and in keeping with the busy street scene. Visitor cycle stands would also be incorporated and a lower paved area would provide access to a cycle store to serve the proposed residential elements.
258. The proposed extension to Livesey Place, referred to as Livesey Mews, and the proposed Linear Park would create places to stay with amenity for different users, at different times of the day. Livesey Mews would be primarily pedestrian, providing access to the residential entrance of the Livesey Building, but with access for servicing vehicles requiring access to the servicing bay. Bollards adjacent to the vehicle service entrance would prohibit traffic entry further along the mews towards the Linear Park. Livesey Mews would be surfaced in trafficable highly quality granite setts, utilizing the existing street cobbling, which would be retained and reused where possible as a historical link. To one side of the mews a row of trees is proposed, integrated between seating brick plinths and other planting, allowing people to sit and look out over Frensham Street Park. Towards the end of Livesey Mews, where it would meet the proposed linear park, the ground floor corner of the Livesey Building would provide a retail / café unit. In front of this, space for outdoor café seating has been incorporated.
259. The podium roof top communal gardens at third floor has been designed to be a mixed use, multifunctional space with play for all ages sitting alongside a mixture of more intimate spaces, larger areas of green and textured and interesting planting with a sensory focus. The overall character would be one of a shared garden. Play opportunities would be integrated throughout, with patterned pavements, engaging lighting, vibrant and rich planting and street furniture that would be robust enough to be climbed on and jumped off. Specific play areas would also be provided with a large sand pit and a grassed area with naturalistic play equipment that would engage the under 12's. The submitted details for the play spaces would be reviewed by Planning Committee Members following submission.
260. The palette of landscaping materials used in the podium communal garden would be similar to that used in the public realm, with ground level planting included where possible. In order

to tie the garden into the architectural design of the buildings, brick surface inlays and plinth seating would be integrated. The perimeter edges of the garden and defensible zones immediately adjacent to apartments would be planted with grasses, shrubs, perennials and native hedgerows.

261. The garden at the fifth floor of the Livesey Building would be a play terrace, particularly suitable for under twelves, but accessible to all. A lawn, seating and planting would sit alongside creative play equipment. The perimeter would be densely planted to shelter from wind, increase privacy and provide visual interest.
262. Finally, the rooftop terraces on top of the Livesey Building and Civic Tower would incorporate viewing decks and sheltered seating areas. Seating and planting would provide more intimate spaces for quiet relaxation. Both terraces would be playable, with the same robust and interesting palette with engaging and diverse planting, but would be calmer in their character and design.
263. Access to the rooftop amenity spaces would be as follows:
 - 3rd floor podium garden: accessible to all residents of the development;
 - 5th floor roof terrace: accessible only to residents of the Livesey building;
 - 24th floor roof terrace: accessible only to residents of the Livesey building; and
 - 38th floor roof terrace: accessible only to residents of the Topps building
264. Some roofs, including that of the Topps Building would not provide amenity space to residents, but rather incorporate extensive green / brown roofs to:
 - increase biodiversity and wildlife habitats;
 - reduce storm water run off; and
 - contribute to improved air quality.
265. Although this, and other green/brown roofs, would not be accessible to the residents they are looked down upon from surrounding apartments. For this reason a sedum-wild flower green roof system is preferred as it is:
 - green most of the year;
 - has good flower colour in the summer;
 - reasonably biodiverse, attracting a lot of insects;
 - works with a thin growing substrate.
266. For roofs that would not be looked over, a brown roof is preferred as it provides maximum biodiversity, has good flower colour in the summer and works with a thin growing substrate.

Image: The landscape masterplan



267. All plant species would be chosen for their hardiness and drought tolerance. Where possible surface water would be collected and redistributed to natural irrigate planting beds. The third and fifth floor podium gardens offer the greatest potential for a sustainable approach to water management, where surface water can be collected and used to irrigate planting beds and tree pits. The levels would be designed to ensure water drains towards areas of planting. They will be planted with native hedgerows towards the perimeter whilst small trees and large shrubs will be used in larger planting beds to offer height, variation and shade.
268. The council's Ecology Officer has reviewed the proposals. He requested further bat surveys, which were undertaken and found to address his concerns. For biodiversity net gain he also advised planning conditions to require 6 Sparrow terraces, 12 bat tubes and 18 internal swift bricks. These, along with conditions relating to biodiverse roofs and other soft landscaping are included in the draft decision notice.
269. The public realm, streetscape and communal amenity spaces would be fully accessible, and would provide level thresholds between internal and external spaces and across the open spaces. Any gradients would be in line with building regulations.
270. The security of existing and new residents has also been considered, with planting and lighting arranged in such a way that there are no hidden corners within the landscape. A lighting strategy would be secured by condition and the metropolitan police are satisfied that this scheme could achieved Secured By Design accreditation.
271. The landscape details submitted to date a considered high quality and appropriate for the development of this part of the Old Kent Road. Final details of the design, materials and

planting proposed would be required by condition.

Trees

272. Saved Policy 3.13 of the Southwark Plan requires high quality and appropriately designed streetscape and landscape proposals.
273. There are two individual trees and two groups of trees within the site boundary. There is another tree immediately adjacent to the site, growing in a shrub bed within the B and Q car park. All trees on the site are classified as U grade trees, which mean they are unsuitable for retention. The tree immediately adjacent to the site is classified as a C grade tree of low quality and value. All of the trees on site would be removed in order to facilitate development. They would be replaced as part of the development proposals, with planting of improved quality, quantity and species diversity. The remaining tree in the B&Q car park would be removed for the Cantium Retail Park proposals.
274. The council's Urban Forester has reviewed the proposals. He has recommended conditions relating to tree protection, tree planting and details of hard and soft landscaping. These are included in the draft decision notice and include for the provision of larger trees rather than saplings.

Southwark Design Review Panel (DRP)

275. This scheme has been presented to the Southwark DRP twice, first on 9th October 2017, and then on 12th June 2018. At the time of the first review, the scheme was still subject to pre application discussions. This was also prior to the purchase of the Topps Tiles Site, which wasn't incorporated into the design at this point. The Civic and Livesey parts of the site were also being treated as distinct development opportunities with some shared facilities. The scheme had changed significantly by the time it was brought back to DRP for a second time.

DRP 1: 9th October 2017

276. At this review, The Panel raised concerns about the scheme coming forward prior to the publication and subsequent adoption of the AAP and, as a result, felt that they could not support the proposals. They also encouraged the designers to join the two sites (Civic and Livesey) and consider improving the civic function of the site.
277. Officer response: The draft OKR AAP was published in December 2017, following this review. Whilst it is still not adopted it has been subject to substantial public consultation. The Civic and Livesey sites have been combined, as recommended by The Panel, and the Topps Tiles site has been incorporated into the scheme. This has resulted in a much more rational single urban block and delivered significant benefits, including the creation of a Linear Park frontage. The civic function and presence of the scheme has been enhanced through revisions to the design of the church and the introduction of the colonnade on Old Kent Road and the new square on Peckham Park Road.
278. The Panel felt that the designs were excessive in height and scale and they questioned the arrangement of the buildings on the site, querying why the taller tower was at the back edge of the footway, and not deeper in the site. They felt that the Civic Tower, as it was designed, was out of scale and disassociated from potential street-level uses.

279. Officer response: The scale of the buildings has been subject to a number of ongoing discussions with Officers. The draft OKR AAP envisages a Tier 1 Tall Building in the location of the Civic Tower, which is felt to be appropriate given the city wide importance of the junction here. The relationship between the Civic Tower and the street has been vastly improved since this review, particularly through the further widening of the footway and the introduction of the colonnade and public square. The incorporation of the Topps Tiles site into the proposals has also allowed the proposed Old Kent Road frontage to be greatly improved, creating a more appropriate High Street character and allowing a direct link into the future Linear Park.
280. The Panel felt that the civic functioning and public realm were both insufficient for the scale of development proposed.
281. Officer response: The proportion of public realm has been increased since this review, to include the proposed colonnade and public square on Peckham Park Road. Furthermore, at the time of this review, the neighbouring Frensham Street site was proposed for mixed use redevelopment. Since this review, it has been decided that the Frensham Street site should become a new public park, which financial contributions from the proposed scheme would make a generous contribution towards.
282. The Panel also had concerns over the quality of private and communal amenity space.
283. Officer response: At this stage in the design process, the roof terraces and podium gardens were not proposed. Since the review, these have been added, addressing this concern. As set out in the section of this report on Outdoor Amenity Space, good levels of private amenity space are now proposed.
284. The response to the Grade II Listed mural, The Panel highlighted that a Heritage Statement would be required, including further investigation as to the significance of the piece and detailed justification for any proposals that would affect it. The Panel were concerned that the social and cultural significance of the mural was not properly integrated into the design.
285. Officer response: Full assessment of the Grade II listed mural has been submitted both in support of this application, and the associated application for Listed Building Consent. At the time of this review, there was a lack of clarity about what would happen to the mural, and it was suggested that it may be relocated to the new Linear Park. Since then however, it has been agreed that it would remain an integral part of this building, in its visually prominent location on the Old Kent Road. Details relating to how it would be removed and reinstated are considered in the report on the associated Listed Building Consent (18/AP/3285).
286. The Panel felt that the scheme required overall greater refinement in terms of architectural expression of the buildings.
287. Officer response: This initial review was carried out at a very early stage in design development. Since then, the architectural expression has been given a great deal of consideration and is now considered to be one of the major benefits of these proposals.

DRP 2: 12th June 2018

288. The scheme was presented to the DRP for the second time on 12th June 2018. In

conclusion, the Panel generally understood the proposed arrangement and planning of the site and felt the design had moved forward since the previous review. The main concerns raised were in relation to height and massing. The Panel made comparisons between the Civic Tower and the tallest tower proposed in the Cantium Retail Park proposals, observing that these proposals offer a much lower proportion of public realm. The Panel suggested that the height of the Civic Tower should be reduced in order to better distinguish it from the Cantium Tower, which should take priority. They also suggested that the Livesey tower should be lowered in height in order to provide a smoother and more comfortable transition from the Malt Street proposal.

289. Officer response: The design team has given these recommendations a great deal of consideration, in discussion with Officers. The tallest tower on the Cantium Retail Park would be 48 storeys in height, clearly taller than the ground plus 38 storey Civic Tower proposed here. As such, it would take primacy to a degree. It is however considered that both sites are appropriate for Tier 1 tall buildings, and the location of the Civic Tower is of sufficient urban significance for a building of the height proposed. In relation to the Livesey Building, given the proposal for the neighbouring site to become a new public park (proposed in January 2019, after the second DRP), the scale proposed is considered entirely appropriate. The transition to other schemes coming forward in the area has been carefully considered.
290. The Panel questioned the civic presence of the tower where it meets the ground, and architectural design of the new church. Whilst they recognised the wishes of the church, they felt the current design emphasised the architectural character of the residential tower and suppressed the public and communal character of the church to the detriment of the design as a whole. They also recognised that the existing building on the site (the former North Peckham Civic Centre) is an important building in its own right. As such, The Panel felt that the current design would benefit from further development to preserve the civic character of the site, including a more distinctive architectural expression at the base of the tower.
291. Officer response: In response to these concerns, the entrance to the church was relocated to the Peckham Park Road elevation and the new public square was created. This gives the church a separate identity from the residential use of the tower.
292. The Panel also raised a concern about the Grade II listed mural at the base of the tower. They endorsed the principle of retaining the mural on the site and stressed that it should retain its pride of place lower down on the Old Kent Road where it can be appreciated and enjoyed in full by the public, but felt that that by moving the mural to a high level recess of the colonnade, the design does not preserve the architectural or historic significance of the mural.
293. Officer response: On the proposed elevation, the mural would be slightly higher than it is in its existing location, but it would remain a clearly visible feature of the street. Indeed, rather than causing harm to the significance of the mural, moving it would have a number of advantages that would better reveal its significance. For example, in its current location the mural is already elevated from street level, and much of it is recessed under the overhanging building above. The existing overhang is not as tall as the proposed colonnade would be, and the recess is deeper. As a result, it is somewhat overshadowed. In its slightly elevated position, within a more generous colonnade, it would be more visible and better lit. In its current position, it is necessary to go up a flight of steps to view the mural. Under the proposed colonnade it would be an integral part of the accessible and inclusive public realm. Finally, the way in which the mural is currently displayed means that it is interrupted by the

entrance to the Civic Centre, in a manner which detracts from its significance. By raising it up slightly it would be above the entrances to the building and would be perceived in uninterrupted, correct chronological order. The other benefit of raising the mural slightly is that it allows it to stay on this prominent junction in the Old Kent Road, but also allows for a new active frontage to be created.

294. Whilst the Panel were satisfied that the designers had a the capability to deliver a high quality design on this site they felt the three tall buildings proposed on the site could benefit from a clear and unified architectural approach.
295. Officer response: In response to these concerns, the design team reviewed and simplified the palette of bricks proposed. As set out above, this now features just two different brick types, to be used in subtly varied combinations with different mortar colours. This has created a much more unified appearance for the scheme. Detailed design conditions, including mock ups of the façade would be required by condition to ensure that the detailed appearance of the brickwork meets this aspiration.
296. Finally, The Panel felt that the frontage to Peckham Park Road would be too blank and would poorly relate to the existing properties.
297. Officer response: This frontage has been redesigned to accommodate the entrance to the church. The introduction of the small urban square also enhances the way in which the proposals interface with existing properties.

HERITAGE AND TOWNSCAPE CONSIDERATIONS

298. London Plan (2016) Policy 7.4, Local Character, states that development proposals should respond to their context, including buildings, opens 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.

The Grade II Listed Mural

299. The former North Peckham Civic Centre is the host building for a Grade II listed mural that depicts the history of the Old Kent Road. It wraps around the recessed ground floor frontage of the existing building, fronting onto Old Kent Road and part of Peckham Park Road. It is a

large ceramic mural made by Adam Kossowski that consists of three panels. It was finished in 1965.

300. As the proposals under consideration require the demolition of all existing buildings on the site, the conservation of the listed mural is an important consideration. It would be carefully removed from the existing building, stored safely and then reinstated on the proposed building. In the proposed scheme it would remain in its prominent position fronting onto the Old Kent Road, but would no longer wrap around the corner, so could be appreciated in its entirety. It would also be placed slightly higher than its current position, above the entrances to the church and residential lobbies. This would have the beneficial impact of protecting the mural from potential vandalism. It would also be under the proposed colonnade and therefore protected from the potentially harmful impacts of inclement weather. The full heritage implications of this proposal are considered in the accompanying report on the parallel application for Listed Building Consent (18/AP/3285). In summary, this report concludes that there would be no harm to the heritage significance of the mural.

Images: The listed mural in its existing and proposed context



Conservation Areas

301. The application site does not sit in a conservation area and it contains no listed buildings. There are however, a number of conservation areas within 1km of the site, meaning that their settings could be impacted upon by the proposed development. These conservation areas include:

Table: Conservation areas within 1km of the application site

Conservation Area	Distance from Application Site
Glengall Road Conservation Area	Approximately 385m
Peckham Hill Street Conservation Area	Approximately 525m
Trafalgar Avenue Conservation Area	Approximately 580m
Cobourg Road Conservation Area	Approximately 700m
Caroline Gardens Conservation Area	Approximately 480m
Thorburn Square Conservation Area	Approximately 680m

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

- Former Camberwell Public Library and Livesey Museum;
- Statue of George Livesey;
- Mural at the Civic Centre;
- 2 – 9 Canal Grove Cottages;
- Gas standard lamp (adapted to electric light), Canal Grove;
- Eveline Lowe School (now Phoenix Primary Academy);
- 1 – 35 (odd) Glengall Road;
- 24-38 (even) Glengall Road;
- 1-9 Glengall Terrace;
- 25-43 Trafalgar Avenue;
- Celestial Church of Christ and attached wall and railings;
- Gasholder No. 13;
- Licensed Victuallers Benevolent Institution (Caroline Gardens);
- 127-151 (odd) Friary Road;
- 108 -124 Peckham Park Road (even); and
- Church of our Lady of Seven Dolours.

303. The Grade II* listed Church of St Augustine is within 1km of the site (approximately 670m north).

Draft OKR APP and Draft Local List

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

Table: Draft AAP Building or Feature of Townscape Merit within the site:

Property	Description
Livesey Place cobbles	Building or Feature of Townscape Merit

305. The following are within the immediate vicinity of the application site:

Table: Draft AAP Building or Feature of Townscape Merit within the immediate vicinity of the site:

Property	Description
90 Haymerle Road (Space Studios and adjacent vacant building known as the Former Pramworks)	Building or Feature of Townscape Merit
Acorn Wharf Chimney	Building of Architectural or Historic Interest
553 Old Kent Road	Building of Architectural or Historic Interest
541-549 (odd) Old Kent Road	Building of Architectural or Historic Interest

1-21 Peckham Park Road (odd)	Building or Feature of Townscape Merit
610-363 Old Kent Road (even)	Building or Feature of Townscape Merit

Heritage Value of the Existing (Undesignated) Buildings on the Site

306. The existing Civic Centre building is not listed or in a conservation area. It is not on the Council’s draft Local List and was not identified as a building of architectural or townscape significance in the draft OKR AAP. It was constructed between 1962 and 1967, to the designs of the Southwark Borough Architect’s Department (F.O. Hayes). It is three storeys in height, broadly square in plan and built in brick with horizontal windows. It is described by an English Heritage (now Historic England) survey of Old Kent Road as “a modernist building typical of its time”.
307. It is important to note that, although the Mural panels were designed for display on the Civic Centre, they do not rely on the host building for their heritage significance. The Civic Centre itself was deliberately omitted from the listing, which was made in 2017 and is accompanied by legal advice which states: “Pursuant to s.1 (5A) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (‘the Act’), structures attached to or within the curtilage of the listed building (save those coloured blue on the map) are not to be treated as part of the listed building for the purposes of the Act.” The significance of the Mural is inherent in its design and craftsmanship, as the work of a known artist, and its connections with the local area. Indeed, the manner in which the panels currently wrap around the different frontages of the host building and are interrupted by an extensive area incorporating the entrance is considered to detract somewhat from appreciation of their significance.
308. Whilst it is of some local interest in terms of the social history of the area, it is not considered that the demolition of the Civic Centre would represent the loss of an undesignated heritage asset. It is however recommended that a condition requiring historic recording of the building prior to demolition is imposed.

Image: Historic England map showing extent of listed structure in blue



309. Neither Historic England nor the 20th Century Society raises any objection to the loss of the existing building in their consultation responses.
310. The building to the rear of the Topps Tiles retail store has been assessed by heritage consultants working with the council to identify industrial heritage in the Old Kent Road area.

The rear part of the building has been identified as the remains (ground floor) of a late 19th Century warehouse, which would have marked the edge of Bridge Wharf, part of the Grand Surrey Canal. It was built by Barton Brothers, an iron monger business. It is understood that the 19th Century warehouse was substantially altered and extended circa 1931, and further altered in the 1940s. In the 1960s -1980s, what remained was crudely reduced to a single storey and given a flat roof. In front of what remains of the late 19th Century warehouse, is a later structure with a zigzag roof, dating from 1916 -1931. This was built by R May and Son, a timber importing business who were a significant presence in this part of the canal. It has not been possible to inspect the current roof and ascertain its age as Topps Tiles operate with a suspended ceiling.

311. Both structures have been substantially altered over time, thus reducing their heritage significance. Given its current state, including the very limited amount of historic fabric remaining, the only real remaining significance of the 19th Century warehouse is its position marking the edge of Bridge wharf. Whilst fascinating historically, it is not considered that this represents sufficient justification for the retention of the building, especially given the fact that it would have to be substantially rebuilt in order to be put back in to use, and would compromise a number of the most positive aspects of the proposals under consideration, including the retail frontage along the proposed linear park. It would also significantly compromise the efficient use of the site, and the delivery of new housing, including affordable housing. As a result, it is considered appropriate for these structures to be removed, but a condition is recommended to require historic recording to be undertaken prior to demolition.

Image: Aerial photograph showing the remains of the 19th Century warehouse lined in pink, and the 20th Century warehouse in front of it



Townscape, Built Heritage and Visual Amenity (TBHVA)

312. The heights of the proposed buildings would result in considerable change in the townscape of the area and would therefore impact on the settings of the heritage assets surrounding the

site. The submitted Townscape, Built Heritage and Visual Amenity (TBHVA) report (ES Volume III) assesses the impact of the proposed development on 34 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.

- 313. Given that large neighbouring schemes at the Malt Street, Cantium Retail Park, Nye’s Wharf, and Ruby Triangle sites now have planning permission or resolutions to grant planning permission, the consideration of the TVIA will focus on the cumulative assessments, rather than those views that show the Malt Street proposals in isolation.
- 314. Following design changes and grant of planning permission (or resolution to grant planning permission) to a number of new cumulative schemes around the application site, a supplementary ES document was submitted. This provides a review of the proposed design changes and the updated cumulative scheme list. In relation to the TVIA, it concludes that the effect of the design changes would be the same as that set out in the previously submitted 2018 TBHVA. In relation to additional or revised cumulative schemes, it concludes that their scale and location is such that they would have little or no interaction with the proposed development in townscape, visual and heritage terms. The cumulative scheme at 301-303 Ilderton Road (yet to be approved), would slightly obscure part of the proposed development in the assessed view from Blackheath Point (View 32 in the 2018 TBHVA), to a small extent, but it would not affect the overall assessment of the effect of the proposed development in this view. The cumulative scheme at the Cantium Retail Park has been amended since the 2018 submission, but it was concluded that the changes would not alter the cumulative assessment for the proposed development as that set out in the previously submitted 2018 TBHVA.

London View Management Framework (LVMF) Views

- 315. 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.
- 316. The LVMF views likely to be impacted upon by the proposed development are 2A.1 from Parliament Hill, 3A.1 from Kenwood and 6A.1 from Blackheath Point.

View 32 (LVMF View 6A.1)	
View location	Panoramic north facing view from Blackheath Point
Heritage Significance	LVMF protected view. Panoramic view, primarily concerned with St Paul’s Cathedral, which is visible towards the centre of this image, to the left of the cluster of tall buildings in the City. The foreground of the view is largely occupied by low and medium scale development in Greenwich and Deptford. Further in the distance, post war towers near Old Kent Road are visible, including the Tustin Estate and Ledbury Estate towers. In the far background of the view, clusters of tall buildings at Vauxhall/ Nine Elms, Elephant and Castle, Blackfriars and London Bridge are evident.

Other Significance	Public Open Space
Sensitivity to change	High
Impact of proposals (cumulative)	The proposed cumulative development would be visible in the distance, on the left side of the panorama, 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 effect, set between Greenwich/Deptford in the foreground and clusters of tall buildings in the far background of the view. Together they would be a high quality addition to the view, and would mark a substantial area of regeneration around Old Kent Road.
HE Comments	None
GLA Comments	The building would be a prominent feature in the capital's skyline creating an additional point of interest in this viewpoint.
Conclusion	As St Paul's Cathedral would remain clearly visible, well to the right of the proposed cumulative development, there would be no harm to the significance of this view.

View 33 (LVMF 2A.1 Parliament Hill)	
View location	The summit of Parliament Hill
Heritage Significance	LVMF protected view. 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.
Other Significance	Public open space.
Sensitivity to change	High
Impact of proposals (cumulative)	The proposed development would be visible in the background of the view, some distance to the right the Viewing Corridor and Wider Setting Consultation Area defined by the LVMF. It would appear well to the right of Guys Hospital and the Ruby Triangle proposals immediately to the right of the existing building. The cumulative development would form a new grouping in the distance, particularly with the Cantium proposals that would be immediately adjacent. The group would mark an area of major regeneration around Old Kent Road and there would be no effect on the silhouette of St. Paul's Cathedral and the ability to appreciate St. Paul's in this view.
HE Comments	None
GLA Comments	The building would be visible to the right of Guy's Hospital, in the background of the view of St. Pauls and would not deter form the viewer's ability to recognise the landmark, or harm the composition of the view as a whole.
Conclusion	The proposed scheme would have no impact on the silhouette of St. Paul's Cathedral or the ability to appreciate St. Paul's in this view. As the silhouette of the Cathedral would be preserved, and the wider setting consultation area would not be encroached upon, it is not considered

	that there would be any harm to this view. Furthermore, the Shard would remain the tallest feature in the view, by quite some degree of magnitude.
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View 34 (LVMF 3A.1 Kenwood House)	
View location	The viewing gazebo at Kenwood House, set within an estate bordering Hampstead Heath.
Heritage Significance	LVMF protected view. The foreground of the view is occupied by the open parkland, with a band of mature trees providing a sense of containment beyond. Central London, and particularly the tall buildings of the City, is visible beyond to the left of centre in the view. St Paul's Cathedral is visible to the right of the Shard. The vista towards St Paul's is protected.
Other Significance	Public open space.
Sensitivity to change	High
Impact of proposals (cumulative)	The proposed development would be visible to the right of St Paul's Cathedral and Guy's Hospital, at a considerably lower height than the Shard. The Civic tower would just break the horizon, but not to the same degree as the immediately adjacent tower on the Cantium site. The existing Guys Hospital also breaks the horizon. The proposed development would fall within the extended background of the Landmark Viewing Corridor and the Wider Setting Consultation elements of the Protected Vista to St. Paul's Cathedral, but not behind the cathedral itself. The Civic tower would appear at a slightly lower apparent height than the existing Guy's Hospital tower and the apparent height of the Cantium proposal. It would appear behind the western towers of St. Paul's, and behind the Avondale Estate towers which are already seen behind the western towers, and the cumulative development already consented in the Old Kent Road Opportunity Area. As such, it would add to the existing and emerging context and, in line with paragraph 121 of the LVMF Supplementary Planning Guidance, "contribute to a composition that enhances the setting of the Strategically Important Landmark".
HE Comments	None
GLA Comments	The building would be visible to the right of the Shard and would form part of the wider skyline, particularly when viewed in the context of Guy's Hospital.
Conclusion	As there would be no impact on the perception of St Paul's Cathedral, there would be no harm to the view.

Borough Protected Views

317. 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 P19:1 The London panorama of St Pauls Cathedral from One Tree Hill, and P19:2 The linear view of St

Pauls 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 30 (Local View P19.2)	
View location	View of St. Pauls Cathedral from Nunhead Cemetery
Heritage Significance	Protected borough view identified in the draft New Southwark Plan. 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.
Other Significance	Public open space and cemetery.
Sensitivity to change	High.
Impact of proposals (cumulative)	The majority of the proposed Old Kent Road cumulative development, including the proposals under consideration here, would be located well to the side of St. Paul’s Cathedral in this view. The proposed development would be obscured by trees to such an extent that it would be invisible in summer and virtually indiscernible even in winter.
HE Comments	None
GLA Comments	None
Conclusion	The proposed development would not be visible in this protected view and therefore would not cause any harm to its significance.

View 31 (Local View P19.1)	
View location	Panoramic north facing view from One Tree Hill
Heritage Significance	Protected borough view identified in the draft New Southwark Plan. 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).
Other Significance	Public Open Space
Sensitivity to change	High
Impact of proposals (cumulative)	The proposed cumulative development would be visible in the distance, towards the centre and right hand side of the view, some distance from St. Paul’s Cathedral. It would sit in front of the cluster of towers in central London, but on the whole would be perceived as lower than the tallest parts of the city cluster. The City cluster could still be perceived. The proposed development would be read as part of an extensive panorama and would contribute to a layered townscape. It would appear as a visually interesting grouping of buildings, comprising elements of different heights and with complimentary elevational finishes.

HE Comments	None
GLA Comments	None
Conclusion	As St Paul's Cathedral would remain clearly visible, well to the left of the proposed cumulative development, there would be no harm to the significance of this view.

Local Views

318. In addition to the strategic views protected by planning policy, the submitted TVBHA sets out the impact on 29 local 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. The impact on each local view is summarised below.

View 1	
View location	Old Kent Road/Albany Road
Heritage Significance	None (NOTE: this view is from outside Thomas A' Beckett Pub, which is identified as a building of architectural significance in the draft OKR AAP, and is on the draft Local List, but is not itself present in the view)
Other Significance	The entrance to Burgess Park appears on the right hand side of the view
Sensitivity to change	Low
Impact of proposals (cumulative)	The proposed development would be viewed as part of a group of new buildings on the Old Kent Road, where it is crossed by Peckham Park Road/ Rotherhithe New Road (the crossing of city wide significance identified in the 'Stations and Crossings' strategy described above. The Cantium Retail Park proposals would obscure the tallest of the buildings under consideration here (the Civic Centre tower) and the Topps Tiles part of the application site from view. The Livesey Place building would appear as lower part of the grouping, resulting in a well articulated sky line and a cluster composed of distinct, well proportioned buildings.
HE Comments	None
GLA Comments	None
Conclusion	The cumulative impact on this view would be beneficial. The new cumulative proposals would provide an attractive and high quality backdrop to the Old Kent Road, and perform a landmark role signifying the presence of the centre of the Opportunity Area, the linear park and the node of city wide importance.

View 2	
View location	Old Kent Road/Opp. Trafalgar Avenue
Heritage Significance	Low. The view point is opposite the junction with Trafalgar Avenue, on the edge of the Conservation Area, but not looking into the Conservation Area. To the right hand side of the view there is an older terrace of buildings fronting onto Old Kent Road, identified in the draft AAP as buildings of architectural or historic interest. A proposed extension to

	the Glengall Road Conservation Area is currently being consulted on, that would extend to include the row of trees visible to the right hand side of the view. The trees are a significant presence in the view, even in winter and of heritage significance.
Other Significance	None
Sensitivity to change	Low to medium
Impact of proposals (cumulative)	The proposed development would be viewed as part of a group of new buildings on the Old Kent Road, where it is crossed by Peckham Park Road/ Rotherhithe New Road (the crossing of city wide significance identified in the 'Stations and Crossings' strategy described above. The Cantium Retail Park proposals would obscure the buildings on the Civic Centre and Topps Tiles parts of the application site, and a small part of the Livesey Place building. The rest of the Livesey Place building would be screened to a significant extent by the trees.
HE Comments	None
GLA Comments	None
Conclusion	The cumulative impact on this view would be beneficial. The new cumulative proposals would provide an attractive and high quality backdrop to the Old Kent Road, and perform a landmark role signifying the presence of the centre of the Opportunity Area, the linear park and the node of city wide importance.

View 3	
View location	Old Kent Road/Opp. Ossory Road
Heritage Significance	None
Other Significance	None
Sensitivity to change	Low
Impact of proposals (cumulative)	The proposed development would be viewed as part of a group of new buildings on the Old Kent Road, where it is crossed by Peckham Park Road/ Rotherhithe New Road (the crossing of city wide significance identified in the 'Stations and Crossings' strategy described above. The Cantium Retail Park proposals would appear closer to the viewpoint, at a greater apparent scale than the proposal under consideration here, obscuring almost all of it from sight.
HE Comments	None
GLA Comments	None
Conclusion	The cumulative impact on this view would be beneficial. The new cumulative proposals would provide an attractive and high quality backdrop to the Old Kent Road, and perform a landmark role signifying the presence of the centre of the Opportunity Area, the linear park and the node of city wide importance.

View 4	
View location	Nile Terrace

Heritage Significance	Medium. This viewpoint is within the Trafalgar Avenue Conservation Area.
Other Significance	None
Sensitivity to change	Medium
Impact of proposals (cumulative)	The proposed development would be completely obscured by existing buildings and would have no effect in this view. The tops of the proposed buildings on the Cantium Retail Park and the Malt Street site would be visible above the terrace, but not to a harmful degree.
HE Comments	None
GLA Comments	None
Conclusion	Very minimal cumulative effect of no harm to the heritage significance of this view.

View 5	
View location	Cobourg Road
Heritage Significance	Medium. This viewpoint is outside the Cobourg Conservation Area, but looking into it. The buildings visible within the view are in the Conservation Area. They are Grade II listed.
Other Significance	The open space of the Cobourg Road Nature Area, which includes mature trees and dense vegetation, occupies much of the view.
Sensitivity to change	Medium - high
Impact of proposals (cumulative)	The proposals would be visible, along with other cumulative schemes (primarily the Cantium Retail Park and the Malt Street schemes) in the middle distance, heavily screened by the mature trees and vegetation of the Nature Area (even in winter). The proposed buildings would not harm the coherence of the listed terrace, and would be clearly distinct from these heritage assets.
HE Comments	None
GLA Comments	None
Conclusion	The impact of the proposed cumulative development would be relatively minor given its distance from the viewing position and the screening effect of the trees. As such there would not be any harm to the heritage significance of the view.

View 6	
View location	Cobourg Road towards former Church of St. Mark
Heritage Significance	This viewpoint is located on Cobourg Road, within the Cobourg Road Conservation Area. The former Church of St. Mark, which is grade II listed, dominates the view. It is in red brick with stone dressings, has a steeply pitched slate roof over the nave, and a distinctive wooden clock tower with copper spire. Terraced housing lies to the north of the former Church.
Other Significance	None
Sensitivity to change	Medium - high
Impact of proposals	The proposed development would be completely obscured

(cumulative)	from sight by existing buildings and would have no effect in this view. No cumulative schemes would be visible either.
HE Comments	None
GLA Comments	None
Conclusion	No effect.

View 7	
View location	Burgess Park, looking over lake
Heritage Significance	The lake dominates the foreground of the view. Cobourg Community Primary School is prominent in the view on the other side of the lake. Trees within the park screen views beyond to some extent, but a range of buildings are visible, including terraced houses within the Cobourg Conservation Area, some of which are listed.
Other Significance	Major open space of Burgess Park.
Sensitivity to change	High
Impact of proposals (cumulative)	The cumulative development would be visible in the backdrop of this view. The proposed development would be almost completely obscured by the Cantium Retail Park and the Malt Street schemes. The part of the Civic Tower that would be visible would be perceived as being lower than the adjacent cumulative schemes. Together, the cumulative development would form a new distinct layer of townscape on the skyline; clearly separate from the park in the foreground and other lower scale buildings, including the listed buildings within the Conservation Area.
HE Comments	Despite some visibility of distant towers along the Old Kent Road, certain views from the Park towards the Conservation Area remain relatively unspoilt. We consider that views further north along the lakeside pathway more successfully capture the unspoilt character of the conservation area, and provide greater visibility of its Grade II listed townhouses, and the Grade II listed former Church of St Mark (now the New Peckham Mosque). Nonetheless, on the basis of the available information, the proposed development would rise substantially above the existing tree and roofline resulting in a dominant intrusion on the skyline. This would significantly reduce the attractive and picturesque qualities of the conservation area in views from Burgess Park.
GLA Comments	None
Conclusion	There would be a major impact on this sensitive view, but it is not considered that this would be harmful. The proposed development would be visually distinct from the historic school and the lake, which would remain the focus of the foreground and mid ground. The tree canopy enclosing the park would remain clearly defined, and the distant view of the listed houses within the conservation area would not be disrupted.

Image: The cumulative impact of the proposals on View 7. The proposals under consideration here are shown in green Cantium Retail Park proposals are in pink and Malt Street in purple.



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1.6 m above ground 14:32 30 March 2017

View 8	
View location	Burgess Park, along line of the canal path
Heritage Significance	None
Other Significance	This view is from Burgess Park, on an important route through the open space, along the line of the former Grand Surrey Canal.
Sensitivity to change	High
Impact of proposals (cumulative)	The cumulative proposals would appear in the middle distance, at the end of the route through the park, forming a focal point on the skyline. The proposed development would be almost entirely blocked from sight by the Malt Street proposals. Together, the cumulative development would form a new, distinct layer of townscape with an interesting composition. It would also fulfil a landmark role at the end of this important axis, marking the centre of the Opportunity Area and improving the legibility of the skyline.
HE Comments	None
GLA Comments	None
Conclusion	There would be a major impact on this sensitive view, but it is not considered that this would be harmful. Indeed, to the extent that it creates a new focus on the skyline, it would have a beneficial impact.

View 9	
View location	Glengall Terrace
Heritage Significance	This viewpoint is from within the Glengall Road Conservation Area. Most of the houses in the view are Grade II listed.
Other Significance	None
Sensitivity to change	High
Impact of proposals (cumulative)	The cumulative proposals would be very visible behind the listed houses and their perceived height would be markedly out of character with the existing, coherent historic townscape. The proposed development would be largely obscured by the Cantium Retail Park and Malt Street schemes. The small part that would remain visible would appear as a coherent part of a new background layer of townscape marking the centre of the opportunity area. The Malt Street proposals would be perceived as the tallest elements in the view.
HE Comments	The proposed tall buildings would rise significantly above the currently uninterrupted roofline of the Grade II listed buildings along Glengall Road and Glengall Terrace, significantly affecting this key view within the Glengall Road Conservation Area.
GLA Comments	The proposed tall buildings would be clearly visible and would affect the setting of the conservation area and the setting of the Grade II listed villas within the conservation area. The proposed buildings would appear in the backdrop setting to the listed villas on Glengall Road and would serve to remove the clear sky that allows the roof and chimney profiles of the villas to be clearly see. As such, the proposals are considered to cause some harm to the setting of the Glengall Road Conservation Area and to the listed villas on Glengall Road. However, when viewed within the context of the wider townscape and the proposed consented developments within the Old Kent Road area, the proposals are considered to have a comparable impact to those approved schemes and cause less than substantial harm to the setting of the listed buildings and the conservation area. This harm is considered to be sufficiently outweighed by the planning benefits of the redevelopment of the site, in accordable with policy 196 of the NPPF. Those benefits include new homes, including affordable homes, a new place of worship and re-provision of employment floorspace.
Conclusion	The appearance of modern tall elements in this coherent historic townscape would have a harmful visual impact. However, Officers consider that the harm caused would be less than substantial in NPPF terms and would be outweighed by the wider regeneration benefits of the proposals.

Image: The cumulative impact of the proposals on View 9. The proposals under consideration here are rendered in detail. The Cantium Retail Park proposals are shown in pink wireline and Malt Street in purple.



View 10	
View location	Bianca Road
Heritage Significance	Low. The view is defined by light industrial buildings, including 49 Glengall Road, which is identified as a building or feature of townscape merit in the draft Old Kent Road AAP, and the chimney behind, which is identified as a 'building of architectural or historic interest'.
Other Significance	This view is looking east along Bianca Road along the alignment of the linear park proposed in the draft AAP.
Sensitivity to change	Low to medium
Impact of proposals (cumulative)	A number of cumulative schemes would appear in the foreground of the view, of a considerably greater apparent height than the proposals under consideration here (most notably the Malt Street proposals). The Malt Street and Nyes Wharf proposals would partially obscure the proposed development. Together, the cumulative development would form a coherent group of tall buildings lining the future linear park and leading the eye to the city wide node at the centre of the Opportunity Area. The heritage significance of the industrial buildings in the foreground would be retained.

HE Comments	None
GLA Comments	None
Conclusion	The existing townscape in this location would be enhanced by the proposed cumulative development, including the provision of the linear park. As such, the impact is considered beneficial.

View 11	
View location	Latona Road
Heritage Significance	Low. This viewpoint is on Glengall Road, looking along Latona Road. The brick warehouse on the left hand side is identified as a building and feature of townscape merit in the draft Old Kent Road AAP.
Other Significance	None
Sensitivity to change	Low
Impact of proposals (cumulative)	A number of cumulative schemes would be seen as a group at the end of the view, signifying the centre of the Opportunity Area and city scale node described above. The development under consideration here would be visible to a small extent behind the brick warehouse building. It would be perceived as distinct from the warehouse in the foreground. It would also be perceived as smaller than other cumulative schemes such as Ruby Triangle.
HE Comments	None
GLA Comments	None
Conclusion	Together, the cumulative schemes would create a focal point in the view at a landmark location. They would create a well articulated skyline that would be clearly distinct from the brick warehouse building. As such, the effect would be beneficial.

View 12	
View location	Jowett Street Park
Heritage Significance	The viewpoint is within the Peckham Hill Street Conservation Area. The park dominates the fore ground and is enclosed to some degree by trees- but the buildings visible are post war housing blocks.
Other Significance	Significant open space.
Sensitivity to change	Medium.
Impact of proposals (cumulative)	The cumulative development proposals would create a new, well articulated skyline to the park, screened by the trees to some extent (particularly in summer), but visible above the tree tops. They would clearly form the backdrop to view, and the park would remain the dominant feature in the foreground.
HE Comments	None
GLA Comments	None
Conclusion	Although the cumulative proposals would create a significant change to this view, it is not considered that this change would be harmful to the heritage significance of the conservation area. Indeed, the well proportioned, slender,

	elegant new buildings on the skyline would have some beneficial impact on the enclosure of the park.
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View 13	
View location	Commercial Way/Peckham Park Road
Heritage Significance	None
Other Significance	Long, direct linear view terminated by the application site
Sensitivity to change	Low
Impact of proposals (cumulative)	The development under consideration here would appear prominently, and the termination of this view, on the junction of Old Kent Road and Peckham Park Road (the city wide node described above). Other cumulative schemes would be visible to either side of the view (Cantium to the left, Ruby Triangle to the right), but the development under consideration here would be the main focus of the view. The Civic tower would appear as an elegantly proportioned tall building, with a strong vertical emphasis in its elevations, and a distinct crown on the skyline. The Livesey building to the left would be shorter, and distinguished by its horizontal emphasis.
HE Comments	None
GLA Comments	None
Conclusion	The new buildings at the termination of the view would have a beneficial impact on the townscape of the area, specifically by creating a high quality termination to the long view and signifying a landmark location.

View 14	
View location	Goldsmith Road/Friary Road
Heritage Significance	Medium to high. Both sides of Friary Road are lined by two storey historic terraces creating a considerable degree of coherence. Those on the east are Grade II listed. There is a school building in the middle distance.
Other Significance	None
Sensitivity to change	Medium to High
Impact of proposals (cumulative)	The development under consideration here would appear prominently in the middle distance, on the junction of Old Kent Road and Peckham Park Road (the node of city wide importance). The Civic Tower would appear as an elegantly proportioned tall building, with a strong vertical emphasis in its elevations, and a distinct crown. The Livesey building would appear to the left, at a noticeably lower apparent height with a strong horizontal emphasis to its elevations. The Cantium proposal would appear behind, at a greater height, adding depth and interest to the composition at the focal point of the directional view.
HE Comments	None
GLA Comments	None
Conclusion	Given the sensitivity of the view, despite the quality of the design proposed, the appearance of modern tall elements in the background of this relatively coherent historic

	townscape would cause some less than substantial harm to its significance. This would however, be outweighed by the wider regeneration benefits of the proposals. As such, it would comply with the NPPF.
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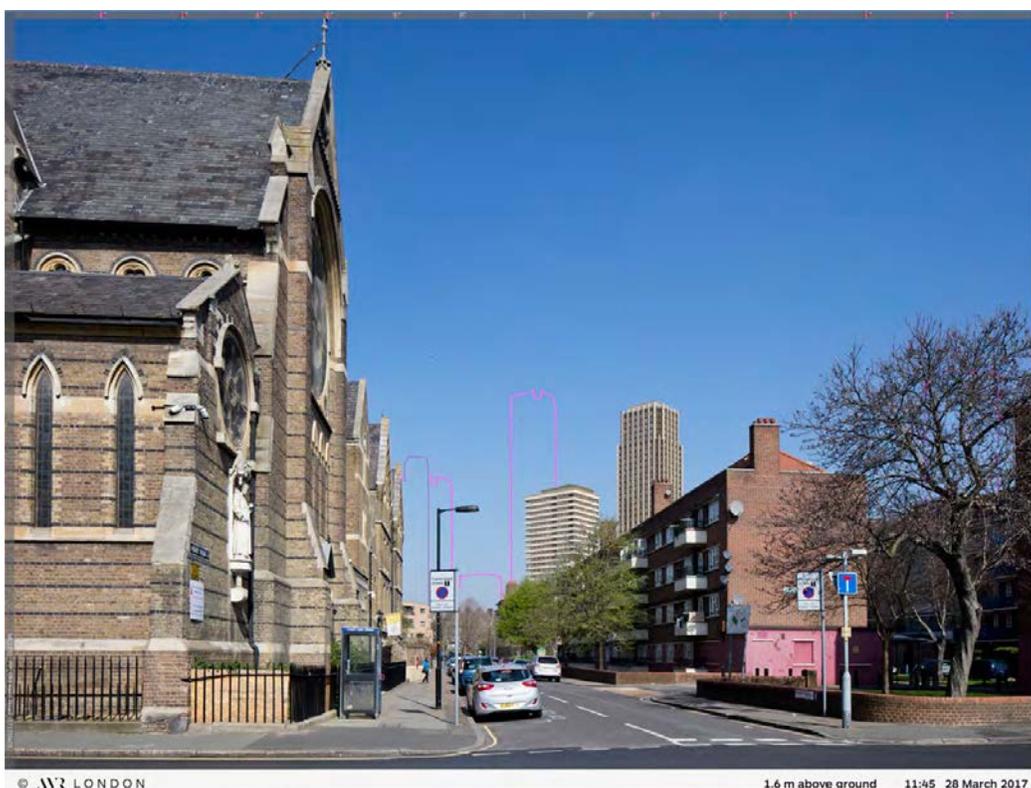
Image: The cumulative impact of the proposals on View 14. The proposals under consideration here are in green. The Cantium Retail Park proposals are shown in pink and Ruby Triangle in purple.



View 15	
View location	Bird in Bush Road/Friary Road
Heritage Significance	Medium. The grade II listed Church of Our Lady of Seven Dolours appears prominently in the foreground of the view
Other Significance	Public Open Space
Sensitivity to change	High
Impact of proposals (cumulative)	The upper parts of the Civic Tower and the Livesey building would be visible behind the Friary Estate, along with the cumulative schemes at Cantium, and a small part of the Malt Street scheme. Together they would all create a well articulated new skyline in the background of the view, signifying the landmark importance of the site at the centre of the Opportunity Area. The Civic Tower would appear as an elegantly proportioned tall building, with a strong vertical emphasis and a distinctive crown. The Livesey building would appear to the left, clearly distinguished by its noticeably lower height and contrasting horizontal emphasis. As a composition they would share a general

	coherence through their use of materials and the regular, ordered nature of their elevations.
HE Comments	None
GLA Comments	None
Conclusion	Given the sensitivity of the view, there would be some less than substantial harm, particularly to the setting of the church. The church would however remain the primary focus on the view, so the harm would be less than substantial, using the parameters established by the NPPF, and outweighed by the wider regeneration benefits of the proposal.

Image: The cumulative impact of the proposals on View 15. The proposals under consideration here are rendered in detail. The Cantium Retail Park proposals are shown in pink wireline and Malt Street in purple.



View 16	
View location	Commercial Way/Naylor Road
Heritage Significance	None
Other Significance	Directional view towards the application site
Sensitivity to change	Low
Impact of proposals (cumulative)	The proposed buildings would appear towards the focus of the view, along with a number of other cumulative schemes- most notably the Cantium proposals. They would create a distinctive and well articulated new backdrop to the view.
HE Comments	None

GLA Comments	None
Conclusion	The cumulative proposals together would form a well articulated new backdrop to the view marking the landmark significance of the centre of the Opportunity Area.

View 17	
View location	Asylum Road/Caroline Gardens
Heritage Significance	High. This view is from Asylum Road looking across the Grade II listed Office to the Licensed Victuallers Benevolent Institution. It is on the boundary of the Caroline Gardens Conservation Area. The edge is defined by high railings and mature trees that screen the listed buildings to a certain degree.
Other Significance	None
Sensitivity to change	High
Impact of proposals (cumulative)	The cumulative proposals would be visible between and behind the blocks of the Ledbury Estate, which has already compromised the heritage significance of this view. The Ruby Triangle proposals would also be visible to the right side of the view, screened to a degree by the trees. They would contribute a new coherent layer to the existing skyline.
HE Comments	The proposed scheme would be clearly visible within the forecourt area of Caroline Gardens. Whilst it would appear clustered amongst the Ledbury Estate buildings, it would nonetheless have an incremental effect on the relatively enclosed setting of the conservation and component listed buildings. Whilst no additional assessment has been made, it is possible that the proposed buildings, which would be taller than the Ledbury Estate, would appear more prominently in views of Caroline Gardens at its south east end along Asylum Road.
GLA Comments	None
Conclusion	The visual presence of the proposed development and cumulative proposals would result in some further harm to the significance of this view. The listed buildings and open space would remain the main focus in the foreground of the view and the harm would be less than substantial according to the parameters of the NPPF. This less than substantial harm would be outweighed by the wider regeneration benefits of the proposals.

Image: The cumulative impact of the proposals on View 17. The proposals under consideration here are in green. The Cantium Retail Park proposals are shown in pink wireline and Malt Street in purple.



View 18	
View location	Old Kent Road/Sylvan Grove
Heritage Significance	None
Other Significance	View from Old Kent Road itself
Sensitivity to change	Low
Impact of proposals (cumulative)	A number of cumulative schemes would appear in the background of the view, some more visible than the proposed development, such as the Malt Street scheme.
HE Comments	None
GLA Comments	None
Conclusion	The cumulative impact on this view would be beneficial. The new cumulative proposals would provide an attractive and high quality backdrop to the Old Kent Road, and perform a landmark role signifying the presence of the centre of the Opportunity Area, the linear park and the node of city wide importance.

View 19	
View location	Ilderton Road near South Bermondsey Station entrance.
Heritage Significance	None
Other Significance	Entrance to South Bermondsey station.
Sensitivity to change	Low

Impact of proposals (cumulative)	The development under consideration would be visible to the far right of the view, screened to some extent by tree branches. Of the cumulative schemes, Ruby Triangle would be visible to the right of the propose development, and of a higher perceived height.
HE Comments	None
GLA Comments	None
Conclusion	Given the low sensitivity of this view to change, it is not considered that the proposals would result in any harmful effects.

View 20	
View location	Camilla Road
Heritage Significance	Medium. The Grade II* listed former Church of St. Augustine, now converted to housing, appears at the end of the view, on Lynton Road. It is in red brick with stone dressings and pitched slate roofs. The former Vicarage to St. Augustine, which is separately Grade II listed appears to the left, although it is not seen clearly from here. The church is partly obscured by housing, and its architecture is better appreciated at closer range. This viewpoint was chosen as a location from which the proposed development might be visible, rather than as the optimal place for appreciation of the former church. Trees screen views of the former church to some extent. From this viewpoint, the setting of the church is dominated by post war housing.
Other Significance	None
Sensitivity to change	Low to medium.
Impact of proposals (cumulative)	The top of the Civic tower would be visible above the roofline of the church. It would appear in the distance, clearly distinct from the church in the foreground. It would not be visible closer to the church, where its heritage significance would be better appreciated. Tree foliage would screen it to some extent in summer. A number of cumulative schemes would appear in the background of the view to the immediate right hand side of the church, but not breaking its roofline. The tower on the Cantium proposal would also break the silhouette of the church.
HE Comments	None
GLA Comments	None
Conclusion	There would be a minor adverse impact on this view, as the previously uninterrupted roofline of the church against the sky would be broken. However, taking into account that this is not the best viewpoint from which to appreciate the listed building's heritage significance, and acknowledging that the impact would be relatively minor, it is not considered that this impact would be harmful.

Image: The cumulative impact of the proposals on View 20. The proposals under consideration here are in green. The Cantium Retail Park proposals are shown in pink and Malt Street in purple.



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1.6 m above ground 09:35 12 December 2017

View 21	
View location	St. James's Road/Rolls Road
Heritage Significance	None.
Other Significance	Directional view towards the application site.
Sensitivity to change	Low.
Impact of proposals (cumulative)	The development under consideration would appear prominently on alignment with St. James's Road, forming a focal point within the view. It would form a landmark role, marking the centre of the Opportunity Area and the node of city wide importance described above. The Civic tower would appear as an elegantly proportioned tall building, with a strong vertical emphasis and distinctive crown on the skyline. The Livesey Place building would also appear at a considerably lower height with a greater horizontal emphasis. The Topps Tiles building would appear as a mid-rise building with well ordered elevations. The Cantium and Ruby Triangle schemes would appear at greater apparent height, forming a well articulated group of new tall buildings on the skyline.
HE Comments	None
GLA Comments	None
Conclusion	The cumulative impact on this view would be beneficial. The new cumulative proposals would provide an attractive and high quality skyline, and perform a landmark role

	signifying the presence of the centre of the Opportunity Area, the entrance to the new linear park and a node of city wide importance.
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View 22	
View location	Old Kent Road/Murdock Street
Heritage Significance	Medium. The Grade II listed Camberwell Public Library and Livesey Museum appear to the left hand side of the view, in front of the application site. Next to them is Christ Church Peckham, which is identified in the draft AAP as a building of architectural and historic merit and on the Draft Local List. Beyond that is a 19th century terrace, identified as buildings and features of townscape merit in the draft AAP. The setting of these heritage assets is mixed in terms of the scale, form, and appearance of other buildings in the view.
Other Significance	None.
Sensitivity to change	Low to medium.
Impact of proposals (cumulative)	The Civic tower would appear prominently in the middle distance, at the corner of Old Kent Road and Peckham Park Road. It would appear as an elegantly proportioned tall building, with strong vertical emphasis and a distinctive crown on the skyline. A very small part of the Livesey building would be visible immediately adjacent to, but at a lower apparent height than Christ Church. Other cumulative development would also be visible in this view, but would not fill in the view of sky between the Civic Tower and Christ Church, ensuring that the church retains its prominence in the view.
HE Comments	None
GLA Comments	None
Conclusion	The cumulative impact on this view would be beneficial. The new cumulative proposals would provide an attractive and high quality skyline, and perform a landmark role signifying the presence of the centre of the Opportunity Area, the entrance to the new linear park and a node of city wide importance. There would be no harm to the heritage significance of the listed and draft locally listed buildings in the foreground of the view.

View 23	
View location	Old Kent Road/Ruby Street
Heritage Significance	Low to Medium. This view point is closer to the application site than View 22. The Grade II listed Camberwell Public Library and Livesey Museum is outside the view, but Christ Church Peckham and the 19th century terrace are dominant in the foreground to the left hand side. Their setting remains mixed, dominated by the Old Kent Road itself and a large retail shed on the other side of the road.
Other Significance	None.
Sensitivity to change	Low to medium.
Impact of proposals	The Civic tower would appear prominently in the middle

(cumulative)	distance, at the corner of Old Kent Road and Peckham Park Road. It would appear as an elegantly proportioned tall building, with strong vertical emphasis, a clear base at ground level and a distinctive crown on the skyline. Much more of the Livesey building would be visible, but at a lower apparent height than the Civic Tower, and some distance from Christ Church. It would break the roofline of the 19 th Century terrace, but would read as a background element, clearly distinct from the historic buildings. Other cumulative development would be visible, but largely obscured by the development under consideration here. Ruby Triangle would be visible, providing enclosure on the other side of Old Kent Road.
HE Comments	None
GLA Comments	None
Conclusion	The cumulative impact on this view would be beneficial. The new cumulative proposals would provide an attractive and high quality skyline, improve the townscape setting of the Old Kent Road and perform a landmark role signifying the presence of the centre of the Opportunity Area, the entrance to the new linear park and a node of city wide importance. There would be no harm to the heritage significance of the draft locally listed buildings in the foreground of the view.

View 24	
View location	Old Kent Road Opposite Ethnard Road
Heritage Significance	Low to Medium. This viewpoint is closer still to the application site than either view 22 or 23. Neither Christ Church Peckham nor the 19 th century terrace described above remain visible, but another 19 th century terrace, also identified as being of townscape merit in the draft AAP, and appearing on the draft Local List, is visible to the left hand side. Although the existing Civic Centre building is visible, the listed mural cannot be appreciated to any meaningful extent at this distance. It would in any case be replaced in largely the same place (slightly higher form the ground) on the proposed Civic Tower.
Other Significance	None.
Sensitivity to change	Low to medium.
Impact of proposals (cumulative)	The Civic tower would appear prominently in the view, at the corner of Old Kent Road and Peckham Park Road. It would appear as an elegantly proportioned tall building, with strong vertical emphasis, a clear base at ground level and a distinctive crown on the skyline. The Livesey Place building would also be clearly visible, but at a lower apparent height than the Civic Tower. A view of sky would be maintained between the tow buildings to avoid visual coalescence. The Livesey Place building would break the roofline of the 19 th century terrace, but would read as clearly distinct from the historic buildings. Other cumulative

	development would be visible, but largely obscured by the development under consideration here. Ruby Triangle would be visible, providing enclosure on the other side of Old Kent Road.
HE Comments	None
GLA Comments	None
Conclusion	The cumulative impact on this view would be beneficial. The new cumulative proposals would provide an attractive and high quality townscape and perform a landmark role signifying the presence of the centre of the Opportunity Area, the entrance to the new linear park and a node of city wide importance. There would be no harm to the heritage significance of the draft locally listed buildings in the foreground of the view.

View 25	
View location	Sandgate Street
Heritage Significance	None. Although the tops of the Grade II listed Canal Grove Cottages are just visible, their heritage significance cannot be perceived from this viewpoint. Their setting is mixed and does not contribute positively to their heritage significance.
Other Significance	Direct view to application site.
Sensitivity to change	Low to medium.
Impact of proposals (cumulative)	The Civic tower would appear prominently in the backdrop of the view, at the corner of Old Kent Road and Peckham Park Road. It would appear as an elegantly proportioned tall building, with strong vertical emphasis and would have a distinctive silhouette on the skyline. The Cantium Retail Park scheme would appear to the right hand side of the proposed development, at a similar apparent height, but stepping down further along the Old Kent Road (away from the entrance to the linear park) in a well balanced composition. The Ruby Triangle scheme would appear on the eastern side of Sandgate Street (left hand side in view).
HE Comments	None
GLA Comments	None
Conclusion	The cumulative impact on this view would be beneficial. The new cumulative proposals would provide an attractive and high quality townscape and perform a landmark role signifying the presence of the centre of the Opportunity Area, the entrance to the new linear park and a node of city wide importance. Given that the heritage significance of the listed Canal Grove Cottages cannot be perceived from this location, there would be no harm to them. Their setting would be improved by the beneficial townscape impact of the proposals.

View 26	
View location	Old Kent Road/St. James's Road
Heritage Significance	None. Although the existing Civic Centre building is visible, the listed mural cannot be appreciated to any meaningful

	extent at this distance. It would in any case be replaced in largely the same place (slightly higher form the ground) on the proposed Civic Tower.
Other Significance	Direct view to application site.
Sensitivity to change	Low.
Impact of proposals (cumulative)	All three buildings proposed would be prominently visible at the junction of Old Kent Road and Peckham Park Road. They would be perceived as a high quality composition with the Civic tower becoming the focus of the view. It would have a distinct base, which would relate well in height to that of neighbouring buildings. It would appear slender and elegant, with a strong vertical emphasis, enhanced by the narrowing of the piers through the height of the building. The upper floors would create a high quality crown at the top of the building, and interesting silhouette on the skyline. Depth and articulation would be provided through the projection of the piers, together with the deep window reveals and inset windows and balconies. The Livesey Place building would appear to the right of the Civic tower, but would be largely obscured by the proposals for the Cantium retail park. Its strong horizontal emphasis would differentiate it well from the Civic tower. The Topps building would appear towards the front of the composition, of a much lower height and regular, pleasing order. It would give a lower scale definition to the entrance to the new park. The Ruby Triangle proposals would be visible on the other side of the Old Kent Road.
HE Comments	None
GLA Comments	None
Conclusion	The cumulative impact on this view would be beneficial. The new cumulative proposals would provide an attractive and high quality townscape and perform a landmark role signifying the presence of the centre of the Opportunity Area, the entrance to the new linear park and a node of city wide importance.

View 27	
View location	Green Hundred Road
Heritage Significance	Low. In the mid distance is a terrace of two storeys, late 19th century which is identified as being of townscape merit in the draft AAP and is on the draft Local List.
Other Significance	None.
Sensitivity to change	Low.
Impact of proposals (cumulative)	The proposed development would appear in the middle distance, forming a distinct layer of townscape beyond the low and medium scale buildings further in the foreground. The Civic tower would appear prominently in the view, marking the corner of Old Kent Road and Peckham Park Road. It would appear as an elegantly proportioned tall building, with strong vertical emphasis and a distinct crown on the skyline. The proposed Livesey Place building would

	also appear to the left of the Civic Tower, with a generous view of sky between them. Although the Cantium proposals would be visible behind the development under consideration here, and the Cantium tower would be at a greater apparent height, it would not fill this view of sky, so good horizontal separation between the tall elements would remain. A small part of the Topps Tiles building would be visible, at a substantially lower apparent height, with elevations of a well ordered quality. All of the buildings under consideration here would be afforded good depth and articulation through projecting piers and horizontal bands, inset windows and balconies.
HE Comments	None
GLA Comments	None
Conclusion	The cumulative impact on this view would be beneficial. The new cumulative proposals would provide an attractive and high quality townscape and perform a landmark role signifying the presence of the centre of the Opportunity Area, the entrance to the new linear park and a node of city wide importance. Although the Civic tower would break the roof line of the draft locally listed houses, it would be a clearly distinct modern building and would not result in any harm to their heritage significance.

View 28	
View location	Peckham Park Road/Friary Road
Heritage Significance	None. Although there are no designated or identified heritage assets in the view, it is worth noting that the brick blocks of the Friary Estate dominate the foreground and form a relatively coherent townscape. Buildings further in the distance are more varied. The existing Civic Centre is visible to a small extent at the end of Peckham Park Road, the listed mural cannot be appreciated to any meaningful extent at this distance. It would in any case be replaced in largely the same place (slightly higher form the ground) on the proposed Civic Tower.
Other Significance	None.
Sensitivity to change	Low.
Impact of proposals (cumulative)	The proposed development would appear in the middle distance, forming a distinct layer of townscape beyond the buildings of the Friary Estate. The Civic tower would appear prominently in the view, marking the corner of Old Kent Road and Peckham Park Road. It would appear as an elegantly proportioned tall building, with strong vertical emphasis and a distinct crown on the skyline. The proposed Livesey Place building would also appear to the left of the Civic Tower, with a generous view of sky between them and at a much lower height. Both of the buildings under consideration here would be afforded good depth and articulation through projecting piers and horizontal bands, inset windows and balconies. The

	Cantium and Malt Street proposal would be visible at a similar apparent height, but with good visual separation between them.
HE Comments	None
GLA Comments	None
Conclusion	The cumulative impact on this view would be beneficial. The new cumulative proposals would provide an attractive and high quality townscape and perform a landmark role signifying the presence of the centre of the Opportunity Area, the entrance to the new linear park and a node of city wide importance.

View 29	
View location	29 Peckham Park Road/Green Hundred Road
Heritage Significance	Low. Both sides of the northern part of Peckham Park Road are lined by two/three storey development, predominantly from the 19 th century. Those on the right hand side are identified as buildings of townscape merit in the draft AAP. The existing Civic Centre appears at the top of the road, but the listed mural cannot be seen.
Other Significance	None.
Sensitivity to change	Low.
Impact of proposals (cumulative)	The Civic tower and the Livesey Place building would emerge from the tops of the existing buildings on Peckham Park Road. The Topps Tiles building would not be visible. The new buildings would form a distinct new layer of townscape behind the existing buildings. Both would appear prominently in the view, together marking the corner of Old Kent Road and Peckham Park Road and the entrance to the proposed linear park. The Civic tower would appear as an elegantly proportioned tall building, with strong vertical emphasis and a distinct crown on the skyline. The proposed Livesey Place building would appear to the left of the Civic Tower, with a view of sky between them, ensuring no visual coalescence. Both of the buildings under consideration would be afforded good depth and articulation through projecting piers and horizontal bands, inset windows and balconies. The only cumulative scheme visible would be 6-12 Verney Road in the distance on the other side of Old Kent Road.
HE Comments	None
GLA Comments	None
Conclusion	The cumulative impact on this view would be beneficial. The new cumulative proposals would provide an attractive and high quality townscape and perform a landmark role signifying the presence of the centre of the Opportunity Area, the entrance to the new linear park and a node of city wide importance.

View 29	
View location	29 Peckham Park Road/Green Hundred Road

Heritage Significance	Low. Both sides of the northern part of Peckham Park Road are lined by two/three storey development, predominantly from the 19 th century. Those on the right hand side are identified as buildings of townscape merit in the draft AAP. The existing Civic Centre appears at the top of the road, but the listed mural cannot be seen.
Other Significance	None.
Sensitivity to change	Low.
Impact of proposals (cumulative)	The Civic tower and the Livesey Place building would emerge from the tops of the existing buildings on Peckham Park Road. The Topps Tiles building would not be visible. The new buildings would form a distinct new layer of townscape behind the existing buildings. Both would appear prominently in the view, together marking the corner of Old Kent Road and Peckham Park Road and the entrance to the proposed linear park. The Civic tower would appear as an elegantly proportioned tall building, with strong vertical emphasis and a distinct crown on the skyline. The proposed Livesey Place building would appear to the left of the Civic Tower, with a view of sky between them, ensuring no visual coalescence. Both of the buildings under consideration would be afforded good depth and articulation through projecting piers and horizontal bands, inset windows and balconies. The only cumulative scheme visible would be 6-12 Verney Road in the distance on the other side of Old Kent Road.
HE Comments	None
GLA Comments	None
Conclusion	The cumulative impact on this view would be beneficial. The new cumulative proposals would provide an attractive and high quality townscape and perform a landmark role signifying the presence of the centre of the Opportunity Area, the entrance to the new linear park and a node of city wide importance.

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

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

Table: Impact on heritage significance

Listed Buildings and Conservation Areas	Assessment of Impact on heritage significance
Grade II Listed Mural	No harm identified. Mural would be carefully removed prior to demolition and reinstated in broadly the same location on the proposed Civic Tower. The new location proposed would result in some beneficial impacts that would better reveal the heritage significance of the

	piece.
LVMF Views	No harm identified
Local Views	No harm identified
Glengall Road Conservation Area	Some less than substantial harm identified to setting, outweighed by the wider regeneration benefits of the proposals.
Trafalgar Avenue Conservation Area	No harm identified.
Cobourg Road Conservation Area	Some less than substantial harm identified to setting, outweighed by the wider regeneration benefits of the proposals.
Thorburn Conservation Area	No harm identified.
Peckham Hill Street Conservation Area	No harm identified.
Caroline Gardens Conservation Area	Some less than substantial harm identified to setting, outweighed by the wider regeneration benefits of the proposals.
Sceaux Gardens Conservation Area	No harm identified.
Listed Buildings	Some less than substantial harm identified to setting, outweighed by the wider regeneration benefits of the proposals.
Draft Locally listed buildings/ undesigned assets identified in the draft Old Kent Road AAP	No harm identified. The cobbles in Livesey Place would be retained and complemented with new granite setts.

320. 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.
321. There are however six views where either Southwark Officers or Historic England (or both) consider that there would be some harm to townscape and heritage significance. Southwark Officers consider that this harm would be 'less than substantial', as defined by the NPPF, and that the degree of harm would be far outweighed by the regeneration benefits of the proposals.
322. In assessing the degree of harm that would be caused to heritage assets, Historic England concludes that "the proposed development would cause harm to the significance of the Glengall Road, Cobourg Road, and, to a lesser extent, the Caroline Gardens Conservation Area. The setting of various Grade II listed buildings within these conservation areas would also be adversely affected in our opinion."
323. Whilst it is 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 would not be unjustifiably undermined by the ability to see clearly distinct, large-scale modern development beyond

them.

324. 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, this harm would be less than substantial and far outweighed by the wider regeneration benefits of the proposals. As such, it is considered to accord with the NPPF (2019).
325. 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. 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. The draft OKR AAP contains a tall building strategy and this scheme would help to deliver that strategy. 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.
326. 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.

HOUSING MIX, DENSITY AND RESIDENTIAL QUALITY

Housing Mix

327. 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. At least 10% of the units should be suitable for wheelchair users. The housing mix requirements are replicated in the draft OKR AAP (Policy 5).
328. The proposed housing mix would be as follows:

Table: Proposed Housing Mix

Unit size	No. of homes	% of homes
Studio	12	3.2%
1 bed	148	39.8%
2 bed	170	45.7%
3 bed	42	11.3%
Total	372	

329. At 3.2%, the number of studio flats is well within the 5% limit and so is acceptable. They

would all be in the Civic Tower, for private sale. 57% of the proposed homes would have two or more bedrooms. This falls short of the 60% target by 3%. Also, as only 11.3% of the homes would have three or more bedrooms, this is below the 20% requirement.

330. For the affordable housing however, the housing mix would fully meet the policy requirements. 67.8% of the homes would have two or more bedrooms and 31.3% would have three bedrooms. So whilst there would be an overall shortfall in units with two or more bedrooms and three bedroom units, the percentage of these units in the affordable housing mix would exceed the required levels. The housing mix is therefore acceptable.

Table: Proposed housing mix broken down by tenure

Unit size	Private homes		Intermediate homes		Social rented homes	
	No.	%	No.	%	No.	%
Studio	12	4.7%	0	0%	0	0%
1 bed	111	43.2%	12	37.5%	25	30.1%
2 bed	128	49.8%	15	46.9%	27	32.5%
3 bed	6	2.3%	5	15.6%	31	37.3%
Total	257		32		83	

331. During the course of the application, in response to concerns raised by Officers at both Southwark and the GLA, the housing mix was revised to increase the numbers of family homes proposed. As a result, the overall number of three bed homes went from 29 to 42, including an increase from 17 social rented three bed homes to 31. This addresses concerns in the GLA's Stage 1 report that the number of social rented family units should be increased.

Wheelchair Housing

332. 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 New Southwark Plan.
333. 37 of the proposed new homes would meet Building Regulations M4 (3) "wheelchair user dwellings", which equates to 10% (9.9% rounded) of all dwellings. 28 would be private units in the Civic Tower and nine would be for social rent in the Livesey Building. This equates to 24.3% social rented wheelchair units, which is considered a fair proportion as it is reflective of the overall proportion of social rent homes proposed. Of the wheelchair units, seven would be one bed homes and 30 would be 2 bed homes. The wheelchair user dwellings would be secured through the Section 106 Legal Agreement.

Density

334. Policy 3.4, Optimising Housing Potential, of the London Plan states that development proposals 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.

335. The development as a whole would have an estimated density of 3,150 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 4,251 sqm, a total of 1,200 residential habitable rooms and a site area of 0.43 ha.
336. Since the maximum upper limit of 700 hrh would be significantly exceeded, the development would need to demonstrate that it would provide exemplary accommodation of 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 a 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.

Table: Indicators of exemplary design

Indicators of Exemplary Design	Proposal
Provide for bulk storage	An additional 42sqm of residential storage, above that required with dwellings by the Residential Design Standards SPD is proposed in the basement. 339 of the 372 apartments proposed (91%) would have internal storage cupboards which would meet or exceed the Residential Design Standards SPD minimum sizes. The remaining 33 apartments would each fall short of the SPD requirements by up to 10%.
Exceed minimum privacy distances	<p>Minimum privacy distances would be met or exceeded in the following instances:</p> <ul style="list-style-type: none"> • The minimum distance between the Civic tower and the Livesey building, at their closest point, would be 22.5m; • The minimum distance between the Civic tower and the facade of the buildings across Peckham Park Road would be 20m; and • The distance across the new linear park to the Cantium Retail Park proposals would be at least 26.5m. <p>Minimum privacy distances would however, not be exceeded in the following instances:</p> <ul style="list-style-type: none"> • The rear facade of the Topps building would be 9.8m from the Civic tower; and • The rear facade of the Topps building would be 8.8m from the Livesey building. <p>In these instances, the relatively small number of apartments that would experience potentially harmful overlooking, would be dual or triple aspect with unrestricted views in other directions.</p>
Good Sunlight and daylight	Good sunlight and daylight standards would be achieved

standards	<p>within the proposed development.</p> <p>In terms of daylight, within the cumulative context, 839 out of 995 habitable rooms tested (84%) would meet or exceed the BRE Guidelines target daylight value in ADF terms* and 884 out of 995 of habitable rooms tested (89%) would meet or exceed the BRE Guidelines target for Daylight Distribution (being able to see the sky across at least 80% of their area).</p> <p>In terms of sunlight, 219 of the 327 (67%) proposed dwellings would have a main living room window which faces within 90° of due south. Of these 219 rooms, 210 (95%) would meet or exceed the BRE Guidelines for Annual and Winter Probably Sunlight Hours.</p>
Exceed the minimum ceiling height of 2.3m required by building regulations	All residential ceilings would exceed 2.3m. All habitable room ceilings would be at least 2.5m high.
Exceed amenity space standards (both private and communal)	<p>80% of the proposed dwellings would have private external amenity space in compliance with, or excess of London Plan requirements. Although the overall area of private amenity space falls short of Southwark's standards, this would be compensated for by additional external communal amenity space and a financial contribution in line with the Section 106 Planning Obligations and CIL SPD.</p> <p>76 apartments (ie 20% of total) would have additional internal living room space in lieu of external balconies.</p>
Secured by Design Certification	Consultation with the Met Police's Designing Out Crime Officer has taken place. They are satisfied that the proposals could meet the Secure by Design requirements.
No more the 5% studio flats	There would be only 12 studio apartments, which would equate to 3% of the total. All would be private tenure.
Maximise the potential of the site	The site is currently underutilised, and allocated for development within the draft NSP and OKR AAP. The proposals would optimise the relatively constrained site, and would create 372 new homes, up to 2,193 sqm of B class floor space, a 1,558sqm place of worship, and 572 sqm retail.
A minimum of 10% of units are suitable for wheelchair users	All of the proposed dwellings are designed to meet and exceed Building Regulation M4(2), Accessible and Adaptable Dwellings. 10% (rounded) of these dwellings would be easily adaptable to meet the needs of a wheelchair user, to meet building regulation M4(3), Wheelchair User Dwelling.
Excellent accessibility within buildings	Level access would be provided throughout the proposed development, and all residential cores have at least two lifts, ensuring that all apartments are wheelchair

	accessible at all times. All corridors would be at least 1500mm wide, allowing wheelchair access to all parts of the building.
Exceptional environmental performance	The proposals would incorporate excellent fabric performance and energy efficient systems. The design aims to meet the latest GLA polices. The Energy Strategy would use 4- pipe Air Source Heat Pumps, which recover and store heat energy from the residential and commercial cooling systems to generate hot water and space heating.
Minimise noise nuisance between flats, through vertical stacking of similar room types	The proposed dwellings would be well vertically stacked in the majority of cases. Wherever possible, living rooms would abut living rooms across party walls. The proposals would be designed to meet or exceed Building Regulations Part E - Resistance to the passage of sound.
Make a positive contribution to local context, character and communities	The proposals would make a positive contribution to the local area. It would be of exemplary architectural design, in line with the draft OKR AAP, and would contribute to the delivery of the new linear park and Frensham Street park. The new colonnade on Old Kent Road would widen the existing footpath, there would be a new public square on Peckham Park Road and Livesey Place would be improved and extended. All would be well animated at ground floor by new active frontages.
Include a predominance of dual aspect units	Over 63% (236 homes) of the proposed dwellings would be dual aspect. Of the single aspect homes (136), 23.5% (32 homes) would be affordable and 76.5% (104) would be private.
Have natural light and ventilation in all kitchens and bathrooms	Most kitchens would be open plan and so would receive natural light and ventilation via the Living / Dining rooms. Where kitchens / diners are separate, they would have opening windows. All bathrooms would be internal and would be ventilated using mechanical ventilation.
At least 60% of homes contain two or more bedrooms	57% of dwellings across the whole development would contain two or more bedrooms. Of the Social Rented homes, 70% would be two bedroom or larger.
Significantly exceed minimum floor space standards	All dwellings would meet or exceed the minimum space standards set out in Southwark's Residential Design Standards SPD.
Minimise corridor lengths by having an increased number of cores	The upper levels of the proposed residential buildings would generally have short corridors due to their small footprint - a maximum of 8m in the Civic Tower and 12m in the Livesey and Topps buildings. At lower levels, the corridors would be longer in the Livesey and Topps buildings, but windows would be provided to maximise natural light in corridors.
No more than 8 units per core	The proposed buildings would generally have only 5 or 6 apartments per floor per core. The maximum number of apartments per floor per core would be seven.
Achieve exemplary architectural design	The architects, Maccreeanor Lavington, are an award-winning practice. The architectural design

	proposed buildings is of the exemplary standard expected of such experienced designers.
Provide communal facilities, including gardens and community rooms	There would be communal external roof terraces/gardens at 3rd, 5th, 24th and 38th floors, and communal rooms at 3rd floor and the top floors in both Civic and Livesey.
Provide fully, or partially inset balconies	All of the balconies proposed would be fully inset.

* Noting that 1.5% ADF, rather than 2% has been applied as the target for open plan Living/Kitchen/Dining (LKD) rooms (see below for further detail). If 2% is applied as the minimum requirement for LKD rooms, then 781 out of the 995 (78%) habitable rooms tested would meet the target ADF value in the cumulative scenario.

Quality of Residential Accommodation

337. 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).

Unit Size

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

Table: Proposed flat sizes

Unit Type	SPD Requirement (sqm)	Size range proposed (sqm)*
Studio	39 sqm	39.4 - 52.2 sqm
1 Bed 2 Person (flat)	50 sqm	51 – 70.3 sqm
2 Bed 3 Person (flat)	61 sqm	67.2 – 81.1 sqm
2 Bed 4 Person (flat)	70 sqm	76.7 – 97.2 sqm
3 Bed 5 Person (flat)	86 sqm	88.3 – 97.2 sqm

* This includes wheelchair accessible homes, which have higher space standard requirements

340. Of the 31 three bed social rented units proposed, 16 would have separate kitchens and living areas. The other 15 would have open plan living/kitchen/diners. The Residential Design Standards SPD does require that all affordable dwellings with three or more bedrooms should have a kitchen that is separate from the living room, as many Registered Providers require separate kitchens. However, the proposed mix demonstrates choice in this regard, and Officers have recent experience of working with a Registered Provider has provided this choice within the affordable offer.
341. Overall, it is therefore considered that the flat sizes and layouts are acceptable, and would provide for a very good standard of internal amenity.

Dual Aspect

342. Of the 372 homes proposed, 236 (63.4%) would be dual aspect. This is a good overall proportion, which would provide a very good standard of internal amenity for future residents. Broken down by residential building, the Civic Tower would achieve 65.6% dual aspect and the Livesey Place Building (where the social rented homes would be found) would achieve 75.9% dual aspect. The Topps Tiles building would only achieve 28.8% dual aspect, by virtue of its linear form running alongside the proposed new park. However, the vast majority of views from this building would be over the park rather than a road.
343. All of the single aspect homes would be one-bed or studio units, with the exception of two, two-bed units in the Livesey building. These two-bed units would face south-east with views out over the proposed Frensham Street Park.
344. Of the 136 single aspect homes, none would face directly north, but 67 would face north-east or north-west. Of these, 37 would be in the Topps Building, mostly looking directly north east over the proposed linear park. 1 would be in the Livesey Building, looking directly over the podium garden within the proposed development. The remaining 29 would be in the Civic Tower looking north west. At lower levels, some would look at the proposed Topps building, but the vast majority would look out over the proposed linear park to London beyond.
345. Overall, the high proportion of dual aspect homes, particularly for the social rented homes, is considered a very positive aspect of the proposals.

Image: Distribution of single and dual/triple aspect homes on a typical floor



Internal Daylight and Sunlight

346. An Internal Daylight and Sunlight report, based on Building Research Establishment (BRE) Guidance, has been submitted. This considers light to the proposed dwellings using the

Average Daylight Factor (ADF), Daylight Distribution (DD) and Probable Sunlight Hours (PSH) tests (both Annual and Winter). 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. The guidelines also recommend that in cases where a room serves more than one purpose, the minimum ADF should be that for the room type with the higher value. Accordingly, in an open plan Living/Kitchen/Dining (LKD) room, the BRE recommends minimum ADF of 2%. The report submitted in this case however, argues that the principal use of LKD rooms is as living rooms and accordingly the minimum ADF should be 1.5%.

347. The DD test calculates the proportion of a room from which the sky would be visible, and plots the change between the existing and proposed situation. The BRE advises that if there is a reduction of 20% or more in the area of sky visibility, daylight may be noticeably affected.
348. The proposed development has been tested in the current context, and in a cumulative scenario, including surrounding proposed and consented developments. The most important cumulative scheme is the Cantium Retail Park, which would be likely to have the greatest impact in this case.
349. Following submission of the original Internal Daylight and Sunlight report in October 2018, a number of changes were made to the scheme design and the cumulative context evolved. The consultants who carried out the daylight and sunlight assessment reviewed these design changes and concluded that they would have no more than a negligible impact on the sunlight available to future residents as compared to the position reported in the ES Chapter.
350. In daylight terms, when testing the proposed development in existing conditions, 952 out of the 995 (96%) habitable rooms tested would meet the target daylight value in ADF terms (noting that 1.5% ADF, rather than 2% has been applied as the target for LKD rooms). If 2% is applied as the minimum requirement for LKD rooms, then 921 out of the 995 (93%) habitable rooms tested would meet the target ADF value. 971 out of the 995 habitable (98%) of rooms tested would meet the BRE Guidelines target for Daylight Distribution, being able to see the sky across at least 80% of their area.
351. The majority of the habitable rooms that would not meet the minimum ADF values would be in private tenure. In the Livesey Place building, where all the social rented homes and most of the intermediate homes would be located, 329 out of 333 (99%) habitable rooms would meet the target daylight value in ADF terms (noting that 1.5% ADF, rather than 2% has been applied as the target for LKD rooms). If 2% is applied as the minimum requirement for LKD rooms, then 326 out of the 333 (98%) habitable rooms tested would meet the target ADF value. Additionally 331 out of 333 (99%) habitable rooms tested would meet the BRE Guidelines target for Daylight Distribution, being able to see the sky across at least 80% of their area.
352. In sunlight terms the BRE Guidelines makes clear that sunlight is of primary importance to main living spaces. As such, the submitted sunlight assessment tests the proposed main living rooms containing at least one main window which faces within 90° of due south. When tested in existing conditions, 210 out of 219 (96%) such main living rooms in the proposed development would meet BRE Guidelines for Annual and Winter APSH.
353. In the Livesey building (all social rented or intermediate homes), 60 out of 66 (91%) of main

living rooms containing at least one window which faces within 90° of due south would meet the BRE Guidelines for annual APSH whilst 63 out of 66 (95%) of rooms containing at least one window which faces within 90° of due south would meet the BRE Guidelines for winter PSH.

354. In the cumulative context, 839 out of the 995 (84%) habitable rooms tested would meet the target daylight value in ADF terms (noting that 1.5% ADF, rather than 2% has been applied as the target for LKD rooms). If 2% is applied as the minimum requirement for LKD rooms, then 781 out of the 995 (78%) habitable rooms tested would meet the target ADF value. Within the cumulative context, 884 out of 995 (89%) habitable rooms would meet the BRE Guidelines target for Daylight Distribution, being able to see the sky across at least 80% of their area.
355. In the Livesey Place building (all social rented or intermediate homes) in the cumulative context, 293 out of 333 (88%) habitable rooms would meet the target daylight value in ADF terms (noting that 1.5% ADF, rather than 2% has been applied as the target for LKD rooms). If 2% is applied as the minimum requirement for LKD rooms, then 287 out of the 333 (86%) habitable rooms tested would meet the target ADF value. Additionally, 313 out of 333 habitable (94%) of rooms tested would meet the BRE Guidelines target for Daylight Distribution, being able to see the sky across at least 80% of their area.
356. In sunlight terms in the cumulative context, 210 out of 219 (95%) main living rooms containing at least one main window which faces within 90° of due south would meet the BRE Guidelines for Annual and Winter APSH.
357. In the Livesey building (all social rented or intermediate homes), in the cumulative context, 62 out of 66 (94%) of main living rooms containing at least one window which faces within 90° of due south would meet the BRE Guidelines for annual APSH whilst 66 out of 66 (100%) of rooms containing at least one window which faces within 90° of due south would meet the BRE Guidelines for winter PSH.

Overlooking and Privacy within the Proposed Development

358. In order to prevent harmful overlooking, the Residential Design Standards SPD requires proposed developments to achieve a distance of 12m between the front elevations of buildings and/or across a highway, and a minimum of 21m between rear elevations.
359. The Civic tower and the Livesey building are diagonally opposite each other, which means there would be no direct overlooking between them. Furthermore, the minimum distance between them at their closest point would be 22.5m (window – to - window), which is in excess of SPD requirements. The Topps building would be to the northwest of the Civic tower and to the north of the Livesey building, and due to their proposed alignments, direct overlooking is much more likely. The minimum distance between the Topps building and the Livesey building would be 8.8m, and the minimum distance between the Topps building and the Civic Tower would be 9.8m. In both instances this would fall short of the requirements of the Residential Design Standards SPD. It should however be noted that the Topps building is the shortest of the three, at ground plus nine floors, so the number of floors over which these distances would apply would be limited. It is also worth noting that the majority of the homes in the Topps building would be single aspect, facing west towards the new linear park rather than the other proposed buildings. The homes that would face the Livesey Building or Civic Tower would be dual or triple aspect units on the corners. Where there would be

potential overlooking, the layouts of the apartments have been planned so that views would be restricted, and no living rooms look into other living rooms.

360. Whilst the distances do fall short of the SPD requirements, harmful overlooking would largely be avoided, and layouts have been designed carefully to ensure living rooms do not look directly into other living rooms. As a result, it is not considered that the overlooking would be so harmful as to justify refusal of the scheme.

Image: Diagram showing the distance between the proposed buildings



Number of Units Per Core

361. Standard 12 of the Mayor’s Housing Design SPG requires that each vertical circulation core should be accessible to generally no more than eight units on each floor. As stated in the Exemplary Design Standards table, none of the cores in the proposed scheme would have more than 8 flats per core. This is a positive aspect of the design of the scheme.

Table: Number of units per core in each building

Building	Number of Units Per Core
Civic Tower	3-7
Livesey Building	5-7
Topps Building	5-7

Secured by Design

362. The application has been reviewed by the Metropolitan Police, Secure by Design Advisor who is satisfied that, should this application proceed, it would be able to achieve the security requirements of the Secured by Design principles. Planning conditions requiring the proposed development to adhere to the principles and physical security requirements of

Secured By Design are included with the recommendation.

Conclusion on Quality of Accommodation

To conclude, the quality of residential accommodation proposed is generally very high, and a positive aspect of the scheme.

OUTDOOR AMENITY SPACE, PLAY SPACE AND PUBLIC OPEN SPACE

363. Saved Policy 3.11, Efficient Use of Land, of the Southwark Plan (2007) requires a “satisfactory standard of accommodation and amenity for future occupiers”. Saved Policy 4.2. Quality of Residential Accommodation requires high standards of space including suitable outdoor/green space.
364. Four categories of open space are required in major planning applications in the Old Kent Road Opportunity Area:
- 1) Private amenity space (usually gardens, balconies and winter gardens);
 - 2) Communal amenity space (usually courtyards, podium gardens or roof terraces);
 - 3) Children’s play space; and
 - 4) Public open space.
365. The requirements for private amenity space, communal amenity space and children’s play space are set out in adopted policy and the Residential Design Standards SPD. The requirement for public open space is specific to the Old Kent Road Opportunity Area and set out in the draft Old Kent Road Area Action Plan. The policy position on each is set out in turn below:

Private Outdoor Amenity Space

366. The supporting text to Strategic Policy 7, Family Homes, of the Core Strategy (2012) states that family housing must provide a minimum of 10sqm of private amenity space to ensure that children have somewhere safe to play. It also states that new developments must provide additional communal play areas for children, as required by the Mayor’s Supplementary Planning Guidance on Providing for Children and Young People’s Play and Informal Recreation (there is further detail on play space requirements below).
367. The private outdoor amenity space requirements are clarified further in the 2015 Technical Update to the Residential Design Standards SPD, as follows:
- Units containing three or more bedrooms should provide 10sqm of private amenity space; and
 - Units containing two bedrooms or fewer should ideally provide 10sqm of private amenity space. Where this is not possible, any shortfall should be added to the communal amenity space requirement; and
 - Private amenity spaces must be at least 3sqm in area.
368. 29 of the 42 homes containing three or more bedrooms (69%) would have a minimum 10sqm balcony. 13 three bedroom units in the Livesey Building would fall slightly short of this requirement, and would each have a balcony of 8.3sqm. Whilst this does fall short of the

policy position, 8.3sqm is a relatively good sized balcony. It is also worth noting that this has resulted from changes made during the application process, where the layout of the Livesey building was updated to introduce these 13 additional three bed homes, in response to documented need in the borough. These 13 homes would each exceed the minimum internal space standards for three bed dwellings by over 4sqm, and their living spaces would exceed the minimum internal space standards for rooms by over 1.5sqm. Given the small number of homes to which this minor shortfall would apply, their generous internal areas and the fact that the proposals have been revised to maximise the provision of three bed family homes, it is on balance considered acceptable.

- 369. In the Civic Tower, where all of the homes would be private, it was agreed that some external balconies could be omitted, where this is necessary to enhance the overall design. This agreement was made subject to a requirement for at least 5sqm additional internal space within the living room. Where the additional internal living space proposed falls short of the 10sqm target for private external amenity space, this is included in the overall communal amenity space requirements.
- 370. This agreed approach has been adopted for 73 of the 212 homes in the Civic Tower. 67 are one bed units and six are studio, meaning they are all less likely to be occupied by families with children. Each would provide at least 5sqm additional living space, over and above that required by the Residential Design Standards SPD. They would all have Juliette balconies and full height opening doors. The omission of balconies to these homes results in a more streamlined aesthetic to the building and affords the tower a more elegant, slender silhouette. This approach was also taken in the recently approved scheme at Ruby Street.

Image: Typical layout of 1 bedroom home with additional internal amenity space in lieu of external balcony



- 371. The same approach has also been taken to three homes in the Topps Tiles building. Two would be private, and one would be intermediate. This would be the only affordable unit with no private external amenity space. Each would have 5sqm additional living space, over and above that required by the Residential Design Standards. The remaining shortfall has been added to the overall communal amenity space requirements set out below.

Communal Amenity Space

372. In order to comply with the requirements of the Residential Design Standards SPD, 50sqm communal amenity space per development should be provided. This should be provided in addition to the requirement to compensate for any shortfall in private amenity space.
373. In the proposals under consideration, communal amenity space is proposed on top of the podium at third floor level, and on three other roof terraces. The largest would be the roof of the podium, which would serve all new residents. The others would be on the roofs of the Livesey and Civic buildings, and accordingly would only serve residents of those buildings. Residents would be able to invite guests into these spaces at their discretion.

Table: External communal amenity space proposed

External Communal Amenity Space	Total area	Dedicated outdoor play space	Remaining communal amenity space (excluding play space)
3 rd Floor podium garden (all residents)	782 sqm	429 sqm	353 sqm
5 th floor roof terrace (Livesey)	140 sqm	99 sqm	41 sqm
24 th floor roof terrace (Livesey)	285 sqm	0	285 sqm
38 th floor roof terrace (Civic)	339 sqm	0 sqm	339 sqm
Total	1,546 sqm	528 sqm	1,018 sqm

Private and Communal Outdoor Amenity Space Calculations

374. The following tables summarise the private and communal amenity space requirements, against that proposed. This has been calculated for each proposed building in order to accurately account for the roof terraces on the Livesey building and Civic Tower. Please note that the third floor podium garden, which would be accessible to all residents, is considered after each of the buildings. It is at this point that the requirement for 50sqm communal amenity space in addition to any private amenity space shortfall is included.

Civic Tower

Table: Proposed external private amenity space in the Civic Tower, and shortfall against policy requirements

Private amenity space proposed (Private balconies and	Dwelling size	Residential Design Standard SPD (2011) requirement (Para 3.2 New flat developments. Outdoor amenity space (page 25))	No. of flats and amenity Proposals	Shortfall*

terraces)	3 + beds	10 sqm	All three bed homes would have at least 10sqm private amenity space.	Compliant
	1-2 bed flats	Up to 10m2 should ideally be provided. Where this is not possible the remaining amount should be added to the communal amenity space. For example, if a private balcony of 3sqm can be provided, 7sqm should be added onto the communal amenity space.	12 x studio flats 78 x 1 bed flats 116 x 2 bed flats providing between 6.4 and 13 sqm of private amenity space per apartment. 67 homes would provide at least 5sqm additional internal amenity space in living rooms in lieu of external balconies.	Not possible to provide all flats with 10sqm balconies or additional internal living space, resulting in a 731.5 sqm shortfall.
Total shortfall				731.5 sqm

*The shortfall of private amenity is calculated per home rather than total shortfall. Oversized balconies and terrace spaces do not offset the loss in individual private amenity space on other homes.

Table: Proposed external communal amenity space in the Civic Tower, and remaining shortfall against policy requirements

Communal amenity space proposed	Proposal	Shortfall
(Shared roof or podium space EXCLUDING play space)	339 sqm communal amenity space at 38 th floor roof terrace. (Residents would also have access to shared podium garden at 3 rd floor level	731.5sqm shortfall - 339 sqm communal amenity space proposed = 392.5sqm remaining shortfall

	(considered below).	
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Livesey Building

Table: Proposed external private amenity space in the Livesey Building, and shortfall against policy requirements

Private amenity space (Private balconies and terraces)	Dwelling size	Residential Design Standard SPD (2011) requirement (Para 3.2 New flat developments. Outdoor amenity space (page 25))	No. of flats and amenity Proposals	Shortfall*
	3 + beds	10m2	23/36 three bed homes would have a private amenity space of at least 10 sqm, with one significantly exceeding this requirement. 13 three bed homes would have a balcony of 8.3 sqm each.	22.1 sqm.
	1-2 bed flats	Up to 10m2 should ideally be provided. Where this is not possible the remaining amount should be added to the communal amenity space. For example, if a private balcony of 3sqm can be provided, 7sqm should be added onto the communal amenity space.	30 x 1 bed flats 42 x 2 bed flats providing between 5.7 and 16.1 sqm of private amenity space per apartment.	Not possible to provide all flats with 10sqm balconies or additional internal living space, resulting in a 264 sqm shortfall.
Total shortfall				286.1 sqm

*The shortfall of private amenity is calculated per home rather than totals shortfall. Oversized balconies and terrace spaces do not offset the loss in individual private amenity space on other homes.

Table: Proposed external communal amenity space in the Livesey Building, and remaining shortfall against policy requirements

Communal amenity space	Proposal	Shortfall
(shared roof or podium space excludes play space)	<p>41 sqm on roof terrace at 5th floor (excluding dedicated play space. and 285 sqm on roof terrace at 24th floor</p> <p>= 326 sqm</p> <p>(Residents would also have access to shared podium garden at 3rd floor level (considered below).</p>	No shortfall. 286.1 sqm shortfall more than compensated for by 326 sqm communal amenity space.

Topps Building

Table: Proposed external private amenity space in the Topps Building, and shortfall against policy requirements

Private amenity space (Private balconies and terraces)	Dwelling size	Residential Design Standard SPD (2011) requirement (Para 3.2 New flat developments. Outdoor amenity space (page 25))	No. of flats and amenity Proposals	Shortfall*
	3 + beds	10m2	All 3 bed flats have at least 10sqm balcony	N/A : There would be no three bed units in the Topps building.
	1-2 bed flats	Up to 10m2 should ideally be provided. Where this is not possible the remaining amount should be added to the communal amenity	40 x 1 bed flats 12 x 2 bed flats providing between 5 and 17.8 sqm of	Not possible to provide all flats with 10sqm balconies, resulting in a

		space. For example, if a private balcony of 3sqm can be provided, 7sqm should be added onto the communal amenity space.	private amenity space per apartment. Three homes would provide 5sqm additional internal amenity space in their living rooms in lieu of external balconies.	212.2 sqm shortfall.
Total shortfall				212.2 sqm

*The shortfall of private amenity is calculated per home rather than total shortfall. Oversized balconies and terrace spaces do not offset the loss in individual private amenity space on other homes.

Table: Proposed external communal amenity space in the Topps Building, and remaining shortfall against policy requirements

Communal amenity space	Proposal	Shortfall
(shared roof or podium space excludes play space)	No communal amenity space proposed for Topps building only. Residents would have access to shared podium garden at 3 rd floor level (considered below).	212.2 sqm remaining shortfall

Third Floor Podium Garden (Accessible to All Residents)

Table: Proposed external communal amenity space across the whole proposed development, and remaining shortfall against policy requirements

Communal amenity space	Residential Design Standard SPD (2011) requirement (Para 3.2 New flat developments. Outdoor amenity space (page 25))	Proposal	Shortfall
(shared roof or podium space excludes play space)			

space)	50 sqm per development + any remaining shortfall from private amenity space Remaining shortfall from private amenity space: 392.5 (Civic Tower) + 212.2 (Topps Building) = 604.7 sqm 50 + 604.7 = 654.7 sqm required	353 sqm roof garden at 3 rd floor accessible to all residents (excluding dedicated play space).	654.7 remaining shortfall – 353 sqm communal amenity space proposed = 301.7 sqm shortfall £205 per sqm = 301.7 x 205 = Financial contribution of £61,848.50
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375. As set out above, there would be a shortfall in private and communal amenity space of 301.7sqm, which would generate a financial contribution of £61,848.50 in line the Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD (2015). The payment of this financial contribution, which would be secured through the Section 106 Legal Agreement, would make the private and communal open space offer policy compliant. The money would go towards the construction of the Frensham Street Park, immediately adjacent to the proposed development. This approach has been agreed with officers as part of the Council's strategic approach to delivering public realm in the Old Kent Road Opportunity Area.

376. It is also worth noting that 409sqm of internal communal space is proposed across the scheme. This is a positive aspect of the proposals that would contribute well to the amenity enjoyed by future residents, but it has not been counted towards the external amenity space calculations set out above. For information, a breakdown of the internal communal amenity spaces is set out in the table below.

Table: Internal Communal Amenity Space

Internal Communal Amenity Space	Total area
3 rd Floor (all residents)	192 sqm
5 th floor roof terrace (Livesey residents)	0 sqm
24 th floor roof terrace (Livesey residents)	140 sqm
38 th floor roof terrace (Civic residents)	77 sqm

Children's Play Space

377. The supporting text to Strategic Policy 7, Family Homes, of the Core Strategy (2012) states that new developments must provide communal play areas for children, as required by the Mayor's Supplementary Planning Guidance on Providing for Children and Young People's Play and Informal Recreation. 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 10sqm per child bed space, covering a range of age groups. The Mayor provides a Child Play Space calculator, which has been

used in assessing this application.

378. The Mayor’s SPG sets out the intended strategic approach to delivering new and enhanced playspace both on and off-site in new developments. It explains that ‘doorstep’ play (Under 5s) should usually be provided on-site, unless there is existing provision within 100 metres. For 5-11 year olds and children over 12 years old, it recommends that off-site provision is acceptable, if there is existing provision within 100-400 metres and 400-800 metres respectively. This is summarised in Table 4.5 of the SPG, reproduced below.

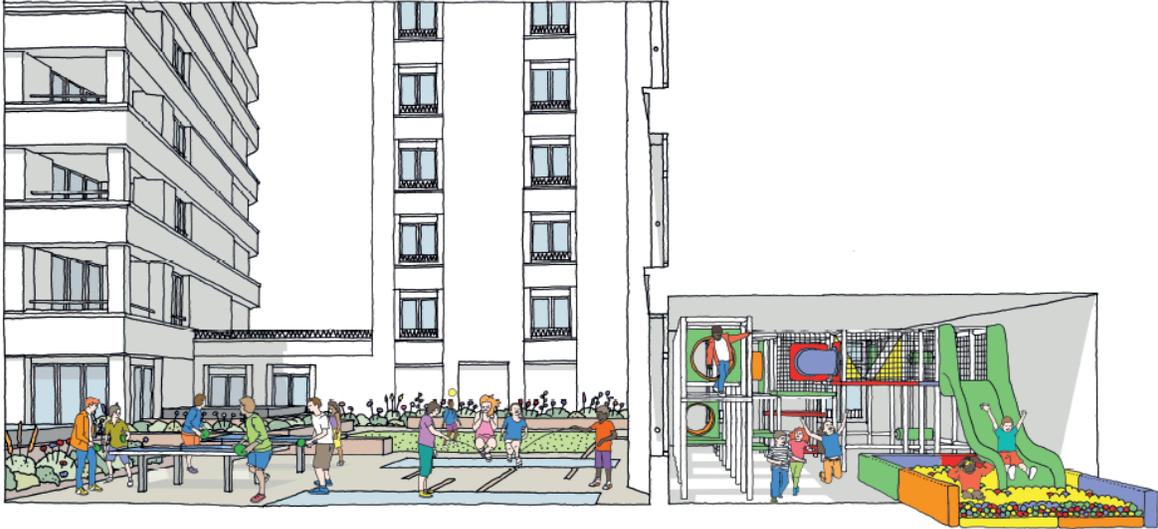
Table 4.5 of the Mayor’s Providing for Children and Young People’s Play and Informal Recreation SPG

Table 4.5 Provision of play space to meet the needs of new development

		Under 5s	5-11	12+
Existing provision	within 100 m	On site or off-site contribution	Off-site contribution	Off-site contribution
	within 100-400m	On-site	On site or off-site contribution	On site or off-site contribution
	within 400-800m	On-site	On-site	On-site or off-site contribution
No existing provision	within 100 m	On-site	Off-site provision	Off-site provision
	within 100-400m	On-site	On-site	On site or off-site provision
	within 400-800m	On-site	On-site	On-site

379. The financial contributions required in line with the Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD (2015) would pay for ‘off-site’ provision, directly funding new and enhanced play equipment close to the site as part of a strategic approach. In this instance, they would go towards new play space proposed in the immediately adjacent Frensham Street park.
380. The landscape design proposed within the application site boundary would integrate play spaces within all of the amenity spaces, with a view that multifunctional spaces provide incidental and naturalistic play. This is in accordance with the Mayor’s SPG. The spaces would be welcoming for children and young people of all ages and abilities, but also for parents and carers as well as any resident of the development.. Detailed drawings of the landscape design, including all play provision, will be secured by condition.
381. The Mayor’s SPG also states that “Indoor space can also have a role in providing sufficient play space for 0-5 year olds” and “The use of roofs, terraces and indoor space can be an alternative to ground floor open space but issues about safety and supervision should be given careful consideration”. Indoor play spaces are proposed within the development. Whilst this is a positive benefit of the proposals under consideration, in line with Southwark’s usual approach, these have not been counted towards the play space calculations below.

Image: Indicative proposal for linked internal and external play spaces



Children’s Play Space Calculations

382. Whilst all of the communal amenity spaces are designed to facilitate play, the applicant has also proposed a number of dedicated external play spaces as follows:

Table: Proposed areas of dedicated external play

Location	Area of dedicated play space
3 rd Floor podium garden (all residents)	429 sqm
5 th floor roof terrace (Livesey residents)	99 sqm
24 th floor roof terrace (Livesey residents)	0 sqm
38 th floor roof terrace (Civic residents)	0 sqm
Total	528 sqm

Image: Proposed play space at third floor level



Image: Proposed play space at fifth floor level



383. The following tables summarise the policy requirements for children’s play space, against that proposed. Again, this has been broken down by building in order to accurately account for the roof terraces on the Livesey building and Civic Tower. Please note that the play space on the third floor podium garden, which would be accessible to all residents, is considered after each of the buildings.

Civic Tower

Table showing proposed external play space in the Civic Tower, and shortfall against policy requirements

Dedicated outdoor child play Space. This can be provided in either the communal or public open space but must be provided in addition to that space, rather than as a sub set of that space.	Required play space based on child yield*.	Proposed play space	Shortfall
Under 5	9 children = 90 sqm		
5-11	3 children = 30 sqm		
12+	2 children = 20 sqm		
Total	15 children = 148.4 sqm	0 sqm on 38 th floor roof terrace. Children would have access to play space on shared podium garden at 3 rd floor level	148.4sqm shortfall

*Figures are taken directly from the Mayor's calculator. The number of children is rounded, but the overall play space required is not, which does in some cases appear as a discrepancy.

Livesey Building

Table showing proposed external play space in the Livesey Building, and shortfall against policy requirements

Dedicated outdoor child play space. This can be provided in	Required play space based on child yield*.	Proposed Play Space	Shortfall

either the communal or public open space but must be provided in addition to that space, rather than as a sub set of that space.			
Under 5	43 children = 430 sqm		
5-11	33 children = 330 sqm		
12+	20 children = 200 sqm		
Total	97 children = 972.3 sqm	99sqm at 5 th floor roof garden. Children would also have access to play space on shared podium garden at 3 rd floor level	972.3 – 99 = 873.3sqm shortfall

*Figures are taken directly from the Mayor's calculator. The number of children is rounded, but the overall play space required is not, which does in some cases appear as a discrepancy.

Topps Building

Table showing proposed external play space in the Topps Building, and shortfall against policy requirements

Dedicated outdoor child play space. This can be provided in either the communal or public open space but must be provided in addition to that space, rather than as a sub set of that	Required play space based on child yield*.	Proposed Play Space	Shortfall

space.			
Under 5	1 - 2 child(ren) = 16.2 sqm		
5-11	0 children = 0 sqm		
12+	0 children = 0 sqm		
Total	1 - 2 children = 16.2 sqm	0 sqm for this building only. Children would have access to play space on shared podium garden at 3 rd floor level.	16.2 sqm shortfall

*Figures are taken directly from the Mayor's calculator. The number of children is rounded, but the overall play space required is not, which does in some cases appear as a discrepancy.

Third Floor Podium Garden (Accessible to All Children)

Table showing proposed external play space in the Topps Building, and shortfall against policy requirements

Building	Shortfall identified within each building	Proposed dedicated play space at 3rd Floor podium garden (accessible to all residents)	Remaining shortfall
Civic	148.4 sqm		
Livesey	873.3 sqm		
Topps	16.2 sqm		
Total	1,037.90sqm	429 sqm	1,037.90 – 429 = 608.90sqm shortfall At £151 per sqm = Financial contribution of £91,943.90

384. In accordance with the Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD, any shortfall in the required amount of child play space will be charged at £151 per square metre. £151 per square meter is an average cost in Southwark for improving play space. As set out above, there would be an overall shortfall in children’s playspace of 608.90sqm, which would generate a financial contribution of £91,943.90 in line the Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD (2015).
385. The proposed approach to dedicated play space provision has been to maximise ‘doorstep’ play for under 5’s on-site, in line with the Mayor’s SPG. Some areas have also been proposed for older children on-site (including games rooms). The remainder of the provision will be delivered through a financial contribution to fund new play equipment in the adjacent park for all to enjoy. This approach represents sound town planning principles for the delivery of necessary infrastructure on a strategic level.

Table: Under 5’s doorstep play

Building	Required under 5’s doorstep play	Dedicated under 5’s doorstep play	
Civic	90 sqm		349sqm
Livesey	430 sqm	99 sqm	
Topps	16.2 sqm		
Total	536.2	448sqm	

386. Although they have not been included within the play space calculations, two indoor play areas for 0-5 year olds are included totalling 120.2 sqm. If these were to be included within the calculation above, the scheme would be found to exceed its 0-5 doorstep play requirements on site.
387. The under 5 doorstep play would be provided through a variety of materials and spaces allowing for a rich, diverse play environment that encourages physical activity and interaction with the natural world. This would include:
- Grassed areas;
 - Sandpits and natural play;
 - Tactile play experiences;
 - Custom-made wooden playground equipment;
 - Triggers for imaginative play;
 - Sensory play; and
 - Intimate spaces for parent child engagement
388. Two dedicated spaces for older children’s play have been proposed. There would be an outdoor play area of 80sqm for young people aged 12+ on the third floor roof garden, and an indoor play space of 110sqm for children aged 5-11 opening onto the third floor roof garden. Where it has been proposed, on site play for older children and teenagers would focus on opportunities for “hanging out”. The designers have recognised that older children often occupy space in a different way to younger children - pushing the boundaries of inhabitation, sitting on top of things, climbing into spaces and creating spaces that feel private, and would ensure that the design allows for this as well as more traditional equipment in the form of table tennis tables.

Public Open Space

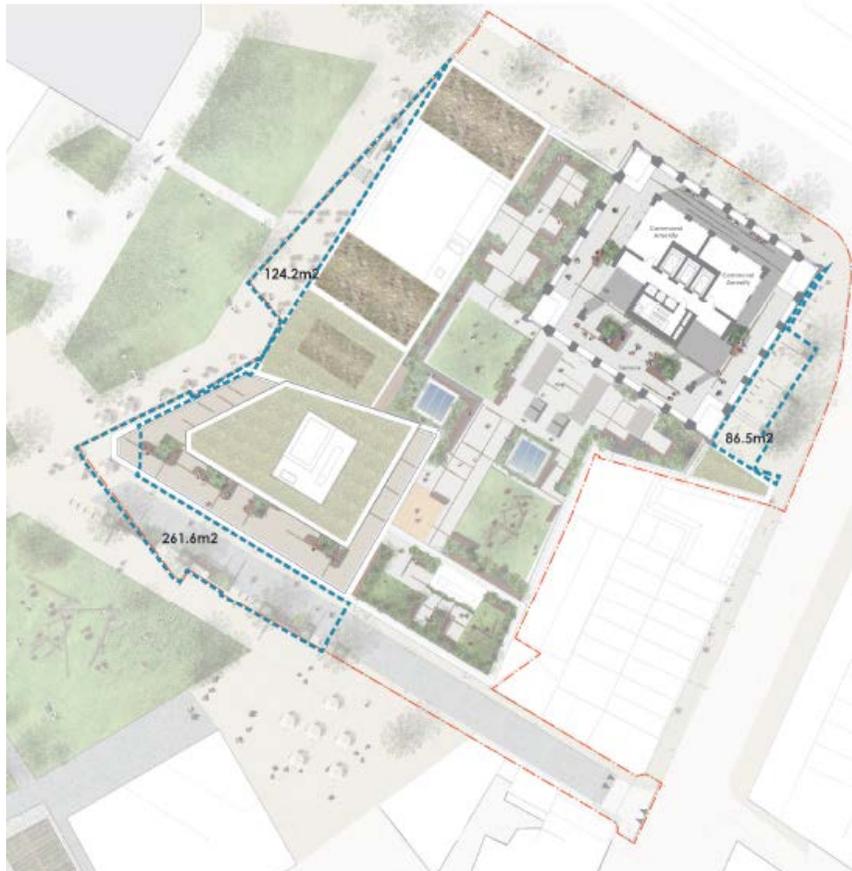
389. In addition to the adopted amenity space requirements set out above, emerging Policy AAP10 of the draft OKR AAP requires the provision of 5sqm of public open space per proposed home. Any shortfall will be charged at £205 per square metre. As set out in the Section 106 and CIL SPD, £205 per sqm represents the average cost for improving open space in Southwark.

390. 472.3sqm of public open space is proposed. This would consist of:

- the square outside the entrance to the church (86.5sqm);
- a contribution to the new linear park (124.2 sqm); and
- the extension to Livesey Mews (beyond the proposed service entrance) (261.6sqm).

391. The proposed extension to Livesey Mews has been designed to compliment the new Frensham Street park and to provide a direct connection into the linear park from Peckham Park Road and the wider area.

Image: Plan showing public open space proposed



Public Open Space Calculation

Table: Public open space proposed

Public Open Space (Public space at ground floor, excluding play space)	Draft OKR AAP (2017) requirement AAP 10: Parks, streets, open spaces –The Greener Belt. (page 46)	Proposed public open space	Shortfall
	Provide 5sqm of public open space per dwelling. If it is not feasible to deliver the open space on site, a financial contribution will be required. 372 homes = 1,860 sqm public open space required	472.3 sqm proposed	1,387.7 sqm shortfall £205 per sqm = Financial contribution of £284,478.50

392. As set out above, there would be an overall shortfall in public open space of 1,387.7 sqm, which would generate a financial contribution of £284,478.50. The payment of the financial contribution, which would be secured through the Section 106 Legal Agreement, would go directly towards the cost of delivering the new Frensham Street Park.

393. In total, as set out above, the proposals under consideration would generate the following financial contributions relating to amenity space, play space and public open space, all of which would go directly towards the cost of delivering the new Frensham Street Park:

- £ 61,848.50 for private and communal outdoor amenity space
- £ 91,943.90 for children's play space
- £284,478.50 for public open space
- **£438,270.90 in total**

394. In addition to this, the applicant has agreed to cover the final costs of the delivery of a service road through the new Frensham Street Park, which would be required in order to safely service the proposed development without requiring vehicles to turn right off Peckham Park Road into Livesey Place. The Council has commissioned a break down of the estimated costs of delivering the Frensham Street Park, including this service road. The estimated cost of the service road is £193,000, although the final cost would be subject to detailed design and specification. This will be secured through the Section 106 Legal Agreement.

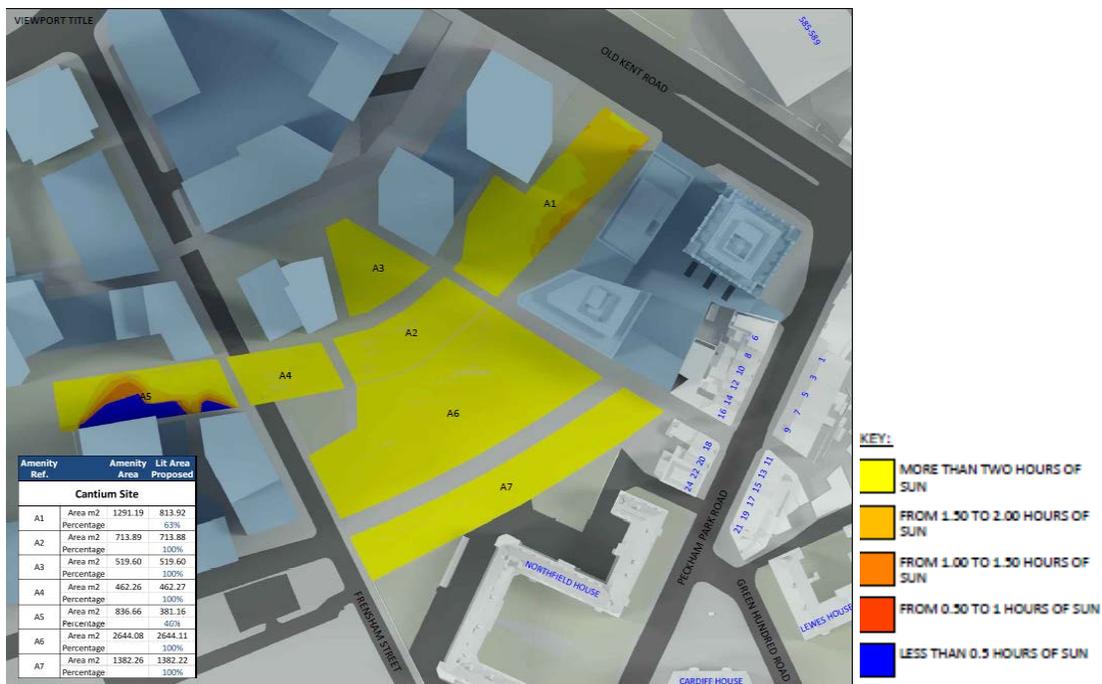
Sunlight Amenity Analysis within the Proposed Development

395. No formal sunlight amenity analysis was undertaken for the rooftop gardens and terraces within the proposed development. Given that they all have open aspects, including the third floor podium garden, which has an open view to the east, south and on the most part to the west in both the proposed and cumulative positions, and that there would be no obstruction to the south, they would have very good access to sunlight and would meet and exceed the BRE Guidelines which state that it would require 2hrs of sunlight to 50% of its area on March 21st.

Sunlight Amenity Analysis within the Proposed Parks

396. The BRE Guidelines recommend that an outdoor amenity space should receive at least 2 hours of sunlight on March 21st to at least 50% of its area, or retain at least 80% of its former value with the proposed development in place. The Linear Park and Frensham Street Park have been analysed in seven nominal areas, in the cumulative context (i.e. with other proposed and consented schemes in place). Taken overall, both parks would receive at least 2 hours of sunlight on March 21st to over 50% their area and would therefore meet the BRE Guidelines. The majority of the park (areas A2, A3, A4, A6 and A7 in the image below) would receives 2 hours of sunlight on March 21st to 100% of their area showing that they will be very well sunlit. Area A1 to the north of the proposed development would receive 2 hours of sunlight on March 21st to over 63% of its area also meeting the BRE Guidelines. Area A5, between the Malt Street and Nyes Wharf proposals, would receive 2hrs of sunlight on March 21st to only 46% of its area, but it would not be affected by the proposed development under consideration here. Overall therefore, when considering the impacts of the proposed development, both the Linear Park and Frensham Street Park would meet the BRE Guidelines for Sunlight Amenity and would, in general, be very well sunlit.

Image: Sunlight amenity analysis in the cumulative context



Conclusion on Outdoor Amenity Space, Play Space and Public Open Space

397. In conclusion, given the density and site coverage of the scheme under consideration, Officers are on balance satisfied with the quality and quantity of outdoor amenity space, play space and public open space proposed. Whilst there are shortfalls against policy requirements, these are fully mitigated by the agreed financial contributions that would directly fund the creation of a new, publicly accessible park on the adjacent Frensham Street site. Where amenity space is proposed on site, it is well planned, with efficient and imaginative layouts. The landscape proposals are well thought through and of high quality, which is a positive aspect of the scheme. To ensure the spaces delivered are of the highest quality, detailed landscape design can be secured by condition.

IMPACT OF PROPOSED DEVELOPMENT ON AMENITY OF ADJOINING OCCUPIERS AND SURROUNDING AREA

398. 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

399. The re-provision of light industrial floorspace, as well as new uses such as residential, retail, offices and the re-provided church would be compatible with the surrounding land uses which include residential, retail and other commercial uses. In addition, the uses would be compatible with the emerging new developments which include those permitted at Nye's Wharf, Malt Street and Cantium Retail Park. Noise from any machinery and plant can 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. Conditions on opening hours and noise have been included on the draft decision notice.

Daylight and Sunlight Impacts

400. Chapter 6 of the ES considers the potential daylight, sunlight, overshadowing, light pollution and solar glare impacts of the proposed development on surrounding residential properties. This analysis is based on guidance published by the Building Research Establishment (BRE). As required by the ES Regulations, the submitted assessment has been undertaken by competent, experienced, registered professionals.
401. Following submission of the ES in October 2018, a number of changes were made to the scheme design and the cumulative scheme context evolved. Officers therefore requested a review of the ES. In relation to daylight and sunlight, overshadowing, solar glare and light pollution this review concluded that these changes would have no more than a negligible

impact. Officers also requested additional commentary on daylight and sunlight results for properties with moderate or major adverse significance, and on the overshadowing assessment of the gardens serving 1, 2 and 10-13 Canal Grove and the linear park proposed in the draft AAP.

BRE Daylight Tests

402. Guidance relating to developments and their potential effects on daylight, sunlight, overshadowing and solar glare is given within the 'Building Research Establishment (BRE) Report 209 Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice 2nd Edition (2011)' (BRE, 2011) and also in 'Lighting for Buildings Code of practice for daylighting (AMD 7391) BS 8206-2:1992' (BSI, 2008). The Building Research Establishment's (BRE) Site Layout Planning for Daylight and Sunlight, a guide to good practice (1) gives criteria and methods that are explained subsequently for calculating DSO effects on surrounding receptors as a result of the proposed development.
403. While the BRE benchmarks are widely used, these criteria should not be seen as an instrument of planning policy. As stated in the Introduction to the BRE Guidelines paragraph 1.6:

“The guide is intended for building designers and their clients, consultants and planning officials. The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design.”
404. The two most common tests for assessing the likely daylight impacts on surrounding, existing properties set out in BRE Guidelines are the Vertical Sky Component (VSC) test and the Daylight Distribution (DD) test (otherwise known as the No Sky Line (NSL) test) The VSC test calculates the availability of daylight to the outside of a window and the DD test shows the distribution of daylight within a room.
405. The VSC test calculates the angle of vertical sky at the centre of each window and plots the change between the existing and proposed situation. 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 also advise that VSC can be reduced by about 20% of its original value before the loss is noticeable. In other words, if the resultant VSC with the new development in place is less than 27% and/or less than 0.8 times its former value, then the reduction in light to the window is likely to be noticeable.
406. The DD test calculates the proportion of a room from which the sky would be visible, and plots the change between the existing and proposed situation. The BRE advises that if there is a reduction of 20% or more in the area of sky visibility, daylight may be noticeably affected.
407. To assess the likely impact on other proposed new developments where detailed internal layout are available and window positions are finalised, the BRE Guidelines state that the Average Daylight Factor (ADF) test is most appropriate. Accordingly, for surrounding consented residential developments with the potential to be affected by the proposals under consideration here, ADF analysis has been undertaken. ADF provides an absolute measure

of daylight expressed as a ratio of daylight for the room in question as a proportion of the daylight outside at any moment in time. The ADF for a living room should be above 1.5% (i.e. the room should enjoy a minimum of 1.5% of the average external daylight at any moment in time), whilst that for a bedroom and kitchen should be in excess of 1% and 2% respectively. Where, at the time the assessment was carried out, the surrounding consented schemes had not yet undergone detailed design or window positions had not been finalised, VSC façade analysis has been undertaken. This calculates the VSC across an entire façade, and the results are presented graphically with areas of high daylight (27%+ VSC) coloured yellow and areas of lower daylight coloured blue/purple.

408. ADF analysis has also been carried out for the existing property and consented mixed use scheme at 16 Peckham Park Road.
409. In relation to existing windows with balconies above them, the BRE Guidelines acknowledge that they typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction may result in a large relative effect on the VSC, and on the area receiving direct daylight. They advise that the impact of existing balconies can be demonstrated by carrying out additional PSH calculations, for both the existing and proposed situations, with the balconies notionally removed.

BRE Sunlight Tests

410. The BRE sunlight tests are the Annual Probable Sunlight Hours (APSH) and the Winter Probable Sunlight Hours (WPSH) tests. If, with the proposed development in place, a window can receive more than 25% of the available APSH, including at least 5% of WPSH during the winter months, then the BRE advises that the room should still receive enough sunlight. If a window retains at least 80% of its former value in terms of both APSH and WPSH, then the BRE advises that the reduction is likely to be unnoticeable. If the overall annual loss is greater than 4% of APSH, the BRE advises that the room may appear colder and less cheerful and pleasant.
411. The BRE sets out specific guidelines relating to balconies on existing properties. This guidance acknowledges that balconies and overhangs above an existing window tend to block sunlight, especially in summer. Even a modest obstruction may result in a large relative impact on the sunlight received. As a result, they advise that the impact of existing balconies can be demonstrated by carrying out additional PSH calculations, for both the existing and proposed situations, with the balconies notionally removed.

Overshadowing

412. There are two tests for overshadowing, or the availability of sunlight; the 'Sun on Ground' test and the 'Transient Overshadowing' test. The first assesses the proportion on an area where the sun would reach the ground on March 21st each year. The BRE advises that at least half (50%) of the area tested should receive a minimum of two hours of sunlight on the 21st March each year. The second assesses the shadows cast over open spaces at the following key dates through the year:

- 21st March (Spring Equinox);
- 21st June (Summer Solstice); and
- 21st December (Winter Solstice).

413. The BRE advises that at least half of the area tested should receive at least 2 hours of sunlight on 21st March. If the area which can receive two hours of sun on 21st March is less than 0.8 times its former value, the loss of sunlight is likely to be noticeable.
414. Paragraph 3.3.3 of the BRE guidelines states that the availability of sunlight in open space such as the following should be assessed:
- Gardens (usually back gardens);
 - Parks/playing fields;
 - Children playgrounds;
 - Outdoor swimming pools;
 - Sitting out areas such as public squares; and
 - Focal points for views.
415. Accordingly, the following open spaces in the area surrounding the development proposals have been assessed.
- Rear garden for the extant planning consent at 6 Peckham Park Road;
 - Two playgrounds at the Bird in Bush Nursery and Pre School (616 Old Kent Road);
 - Amenity space behind Lewes House;
 - Amenity space around Northfield House;
 - Amenity space in front of Cardiff House;
 - Rear garden at 12 Peckham Park Road;
 - Rear gardens at Canal Grove cottages; and
 - Proposed linear park from the draft AAP.
416. Consented schemes at Ruby Triangle, Malt Street/ Nyes Wharf , and 6-12 Verney Road have also been assessed for transient overshadowing.

Notes

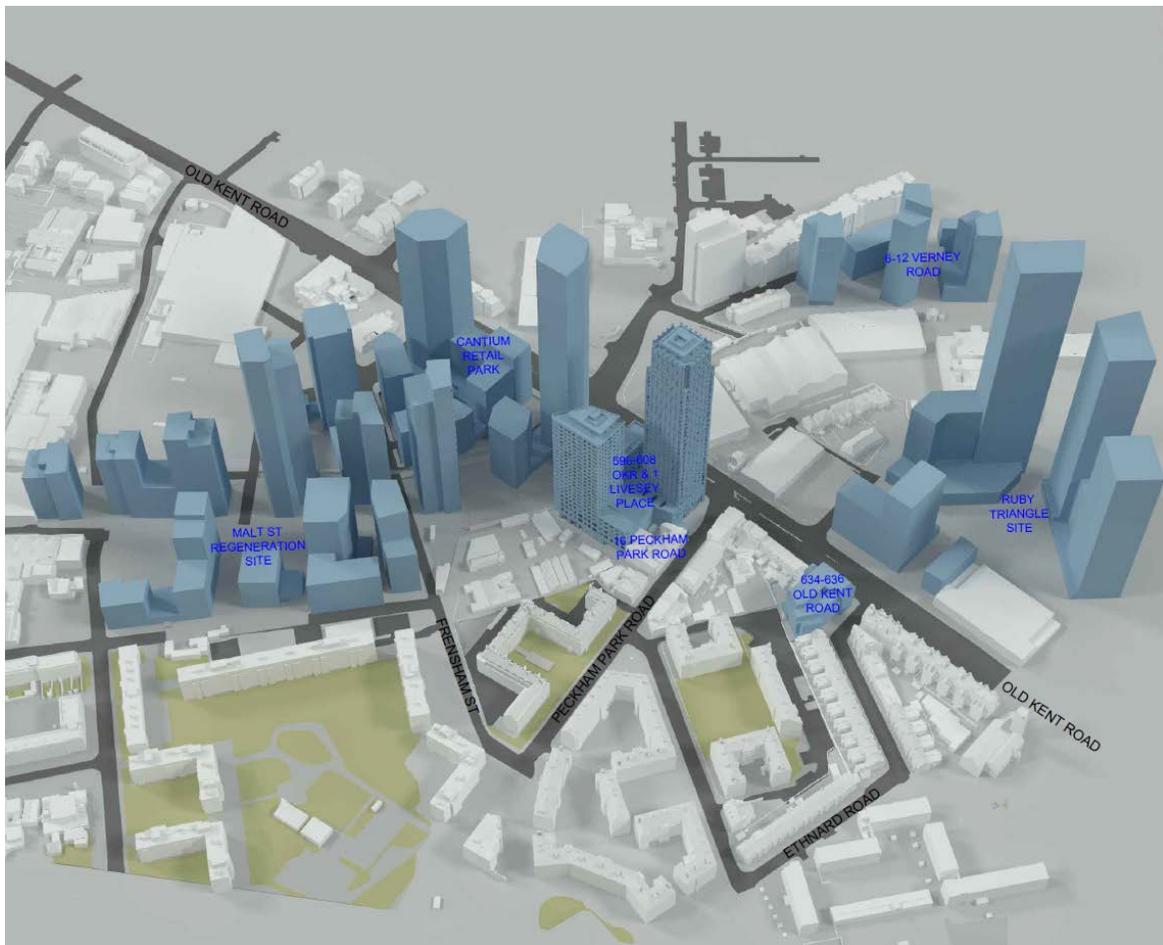
417. The BRE Guidelines are based on a suburban environment, and as such a degree of flexibility needs to be applied when considering an urban environment. They also state that residential properties warrant detailed consideration in terms of daylight and sunlight effects, but that properties of a commercial nature have a lower requirement. Paragraph 123 of the NPPF (2019) states that:
- “Local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).”
418. The existing scale of development on the application site and its surroundings is low for an urban location. As a result, the baseline conditions tend to exceed normal expectations for an urban area, and reductions would be expected to result from any development here. As discussed above, the application site is part of the Draft OKR AAP (2017), which supports the construction of taller buildings in this location. In the draft AAP, development of approximately 16 storeys is anticipated for the Livesey Place portion of the site. As a result, in addition to the assessment of the impacts of the proposals against the existing baseline,

the impacts of the proposals against an 'alternative baseline' massing at the site have also been assessed. The development massing selected for the alternative baseline scenario therefore comprises the massing of the proposed development across all three buildings, limited to 16 storeys. It does not fill out to the limits of the site and neither does it assume a taller height on the corner of Old Kent Road and Peckham Park Road as anticipated by the Area Action Plan. When the daylight and sunlight impact on the neighbouring properties is compared with this notional 16 story massing all losses to the neighbours are small or negligible.

419. The submitted daylight, sunlight and overshadowing assessment has taken into account the following cumulative schemes which have been approved, or have a resolution to grant planning consent:

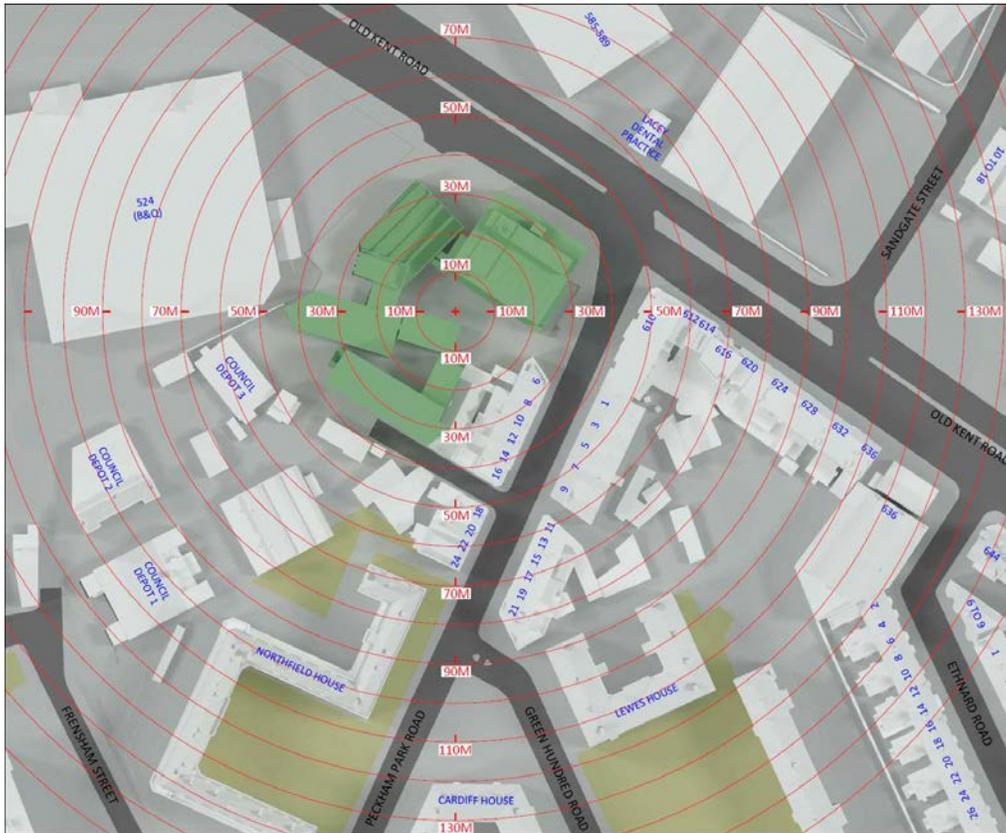
- Land at Cantium Retail Park (18/AP/3246);
- Ruby Triangle (18/AP/0897);
- Malt Street (17/AP/2773) and Nye's Wharf, Frensham Street (17/AP/4596)
- 6-12 Verney Road (17/AP/4508) (overshadowing only);
- 634-636 Old Kent Road (17/AP/1646); and
- 16 Peckham Park Road and 1 Livesey Place (17/AP/0564)

Image: Cumulative schemes considered



420. These schemes have been considered due to their proximity to the application site and the likelihood of them impacting the daylight and sunlight levels to the existing surrounding residents. The results presented in the following paragraphs are the daylight and sunlight impacts for the scheme under consideration along with the cumulative impacts of the schemes named above.
421. The submitted report has taken into account the daylight and sunlight impacts for the following surrounding buildings, which are mostly in residential use (at least in part) and therefore of high sensitivity to daylight and sunlight impacts:
- 624 Old Kent Road;
 - 616 Old Kent Road;
 - Cardiff House;
 - 610 Old Kent Road;
 - 1-21 (Odd) Peckham Park Road;
 - 6 Peckham Park Road;
 - 8-14 (Even) Peckham Park Road;
 - 18-24 (Even) Peckham Park Road;
 - Lewes House; and
 - Northfield House
422. Properties of low sensitivity were also tested, including Frensham Street depot, B&Q, Lacey Dental Practice and 585-589 Old Kent Road (Curry's PC World), but given their low sensitivity the results are not presented here.

Image: Plan illustrating the distance of the receptors from the application site



Significance Criteria

423. The submitted ES proposes criteria to categorise the sensitivity of the properties assessed and plots that against the magnitude of effect to establish the significance of the impact, as shown below:

Table: Significance of effects

Magnitude of Effect	Sensitivity of Receptor			
	High	Medium	Low	Negligible
High	Major significance	Moderate significance	Minor significance	[1]
Medium	Moderate significance	Minor significance	[1]	Negligible significance
Low	Minor significance	[1]	Negligible significance	Negligible significance
Negligible	[1]	Negligible significance	Negligible significance	Negligible significance
[1] The choice between 'Minor Significance' and 'Negligible Significance' will depend on the specifics of the impact and will be down to professional judgement and reasoning.				

Table: Scale of Magnitude

Magnitude	VSC	ADF (16 Peckham Park Road)	APSH	WPSH	Overshadowing (Sun on ground)
High	VSC < 27% AND Change < 40%	ADF <60% target value	APSH < 25% AND Change < 40%	APSH Winter < 5% AND Change < 40%	SOG < 50% AND Change < 40%
Medium	VSC < 27% AND Change 30% - 40%	ADF <80% target value, >60% of target value	APSH < 25% AND Change 30% - 40%	APSH Winter < 5% AND Change 30% - 40%	SOG < 50% AND Change 30%-40%
Low	VSC < 27% AND Change 20% - 30%	ADF <target value, >80% of target value	APSH < 25% AND Change 20% - 30%	APSH Winter < 5% AND Change 20% - 30%	SOG < 50% AND Change 20%-30%
Negligible	VSC ≥ 27% OR Change <20%	ADF above target value (i.e. >2% for kitchen, 1.5% Livingroom, 1% Bedroom)	APSH ≥ 25% OR Change <20%	APSH ≥ 5% OR Change <20%	SOG ≥ 50% OR Change >20%

Impacts

424. The results for daylight, sunlight and overshadowing assessment are presented for each property tested in the following paragraphs.

624 Old Kent Road

425. Although one of the two residential windows tested in this property would experience moderate losses outside the BRE guidance in terms of VSC, its DD/NSL results demonstrate that the 1 residential room that they serve would retain a well day lit appearance, with a resultant NSL of 93.65%, which would be 0.99 times the former value when comparing the cumulative proposed position against the cumulative existing baseline.
426. In terms of sunlight, the one window within 90 degrees of due south would retain 65% APSH and 21% WPSH, both well in excess of BRE guidelines. It would not fall below 0.80 times its former values.
427. The daylight impact on this property would be of **low magnitude**, and given its sensitivity, this would result in an impact of **minor significance**. The sunlight impact would be of **negligible significance**.

616 Old Kent Road

428. All of the eight residential windows serving this property would retain a VSC over 27%, or over 0.8 times its former VSC value. As such, the rooms would retain a good level of daylight and/or the change in daylight would not be noticeable when compared with the existing cumulative baseline position. All rooms would also retain 0.99 times their former DD/NSL value. It is therefore considered that the property would retain a good level of daylight, in line with the BRE guidelines.
429. In terms of sunlight, all of the windows would retain over 54% APSh and 16% WPSH, both well in excess of BRE guidelines. None would fall below 0.8 times their former values.
430. The daylight and sunlight impacts on this property would be of **negligible significance**.
431. Both of the playground for the Bird in Bush nursery and play school at 616 Old Kent Road have been assessed for overshadowing, using the Sun On Ground test. In the larger of the two spaces (A2) 92% of the area would receive 2 hours sunlight on 21st March each year in both the existing and proposed conditions. This would satisfy the BRE guidelines. In the smaller space (A6) 53% of the area would satisfy the BRE guidelines in the existing condition, reducing by only 1% (0.43sqm) in the proposed condition. This would continue to satisfy the BRE guidelines.
432. The overshadowing impact on these amenity spaces would be of **negligible magnitude**, resulting in an impact of **negligible significance**.

Image: Sun on Ground results at 616 Old Kent Road (A2 and A6) (proposed)



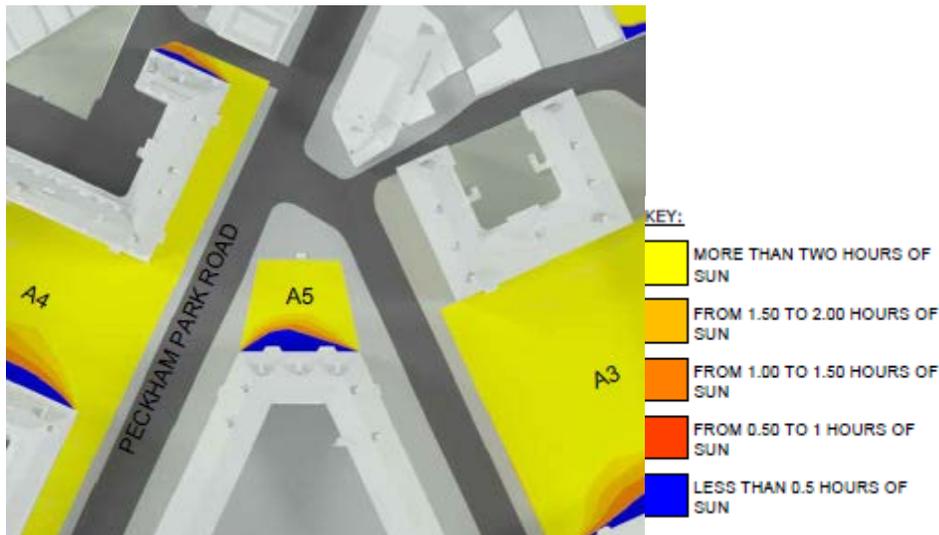
Cardiff House

433. 56 residential windows were tested for this property. 19 of the windows tested would retain a VSC over 27% or 0.80 times their former value in the cumulative context. The other 37 would experience VSC losses of low to moderate magnitude. However, all of the rooms tested would retain DD/NSL levels well in excess of the 80% recommended by the BRE. The lowest NSL would be 93.4%, which would be 0.93 times its former value. Most of the rooms would

retain 0.99 times their former NSL. It is therefore considered that the rooms within the property would retain good levels of daylight, in line with the BRE guidelines.

- 434. None of the windows are within 90 degrees of due south, so no sunlight measures were taken for this property.
- 435. The daylight impact on this property would be of **low magnitude**, and given its sensitivity, this would result in an impact of **minor significance**. Given the orientation of the windows, there would be no measurable sunlight impact.
- 436. The amenity space at the front of Cardiff House has been assessed for overshadowing, using the Sun On Ground test. In both the existing and proposed conditions, 81% of this space would receive at least 2 hours of sunlight on 21st March each year, thereby satisfying the BRE guidelines.
- 437. The overshadowing impact on these amenity spaces would be of **negligible magnitude**, resulting in an impact of **negligible significance**.

Image: Sun on Ground results at Cardiff House (A5) (proposed)



610 Old Kent Road

- 438. VSC for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant VSC (residential)						
	Total no. of windows	>27% (satisfying BRE guidelines)	26.99% - 20.00%	19.99% - 10.00%	9.99% - 0 %	Total that don't satisfy BRE
Existing cumulative baseline	30	17	11	2	0	16
Cumulative Result	30	5	2	14	9	25

Reduction in VSC (residential)						
	Total no. of windows	0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction low magnitude	30.1 – 40% reduction Medium magnitude	>40.1% reduction High magnitude	Total that don't satisfy BRE
Cumulative Result	30	7	2	0	21	23

NSL for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant NSL (residential)						
	Total no. of rooms	>80% (satisfying BRE guidelines)	79.99 – 60%	59.99 – 40%	Less than 39.99%	Total that don't satisfy BRE
Existing cumulative baseline	21	15	3	2	1	6
Cumulative Result	21	6	2	7	6	15

Reduction in NSL (residential)						
	Total no. of rooms	0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction	30.1 – 40% reduction	>40.1% reduction	Total with reduction greater than 20%
Cumulative Result	21	6	1	4	10	15

439. Of the 30 residential windows were assessed for daylight impacts in this property, 17 would be compliant with the BRE guidelines for VSC prior to the proposed development (cumulative existing baseline). Following the proposed development, five would retain a VSC over 27%. Of the remaining 25 windows, two would have a VSC over 20%. Both of these would retain 0.82 times their previous value- which the BRE advises would not be a noticeable change. Of the remaining 23 windows, two would experience losses of medium magnitude, one retaining 0.78 times its former value (resultant VSC 16.65%), and one retaining 0.77 times its former value (resultant VSC 18.88%). The remaining 21 windows would experience losses of high magnitude, with the worst effected windows retaining a VSC of less than 5%.
440. For DD/NSL, 21 residential rooms were tested. Prior to the proposed development 15 would be BRE compliant. Following development six would remain compliant. Of the remaining 15, one would retain 0.79 times its former value, which is only just below the 0.8 times recommended by the BRE guidelines. The rest would experience losses of moderate or major magnitude.
441. The daylight impact on much of this property would be of **high magnitude**, and given its sensitivity, this would result in an impact of **major significance**. Three of the windows in this property would be within 90 degrees due south, and have therefore been assessed for PSH. The results are as follows:

- The first window serves a bedroom at first floor level. It would have 25% APSH prior to the proposed development, in line with the BRE guidelines. This would fall to 19% following the development, which is below the 25% recommended by the BRE. The APSH would be 0.76 times its former value suggesting that, whilst the change would be noticeable, it would be of low magnitude. The overall APSH loss would however also be greater than 4%, which the BRE advises could mean that the room may appear colder and less cheerful and pleasant. In winter, this window's WPSH would be reduced from 4% (already below the 5% recommended by the BRE) to 1%. This is 0.25 times its former value and would therefore be a change of high magnitude.
- The second window serves a bedroom on the second floor. Its APSH would reduce from 28% to 22% (below BRE recommendation of 25%). This is 0.78 times its former value, suggesting that whilst the change would be noticeable it would be of low magnitude. The overall APSH loss would however also be greater than 4%, which the BRE advises would mean that the room may appear colder and less cheerful and pleasant. This window's WPSH would go from 4% to 2% (both below the BRE recommendation of 5%). This is 0.50 times its former value. This change would be of a high magnitude.
- The third window serves a bedroom on the third floor. Its APSH would remain well in excess of 25%, at 53%, which is 0.88 times its former value and therefore likely to be unnoticeable. Its WPSH would remain well in excess of 5% at 13%, which is 0.86 times its former value, and again likely not to be noticeable

442. The sunlight impacts on this property would be of **high magnitude** in winter, but **low to moderate magnitude** across the whole year. Given the sensitivity of the receptor, this equates to changes of moderate to **major significance**.

443. There are existing balconies over windows at 610 Old Kent Road. As set out above, the BRE guidance advises that because balconies cut out light from the top part of the sky, even a modest obstruction may result in a large relative effect on the daylight and sunlight received, especially in summer. The BRE guidelines therefore go on to advise that one way to demonstrate the impacts of existing balconies and overhangs, is to carry out additional calculations, for both the existing and proposed situations, without the balconies in place. This analysis has been undertaken at 610 Old Kent Road, and the results are summarised below.

444. VSC for the cumulative baseline position and cumulative proposed position and the reduction factor with the balconies notionally removed:

Resultant VSC with balconies notionally removed (residential)						
	Total no. of windows	>27% (satisfying BRE guidelines)	26.99% - 20.00%	19.99% - 10.00%	9.99% - 0 %	Total that don't satisfy BRE
Existing baseline	30	21	9	0	0	9
Cumulative Result	30	7	0	14	9	23
Reduction in VSC (residential)						
	Total no. of windows	0-20% reduction (satisfying BRE)	20.1 – 30% reduction Low	30.1 – 40% reduction Medium magnitude	>40.1% reduction High	Total that don't satisfy BRE

		guidelines)	magnitude		magnitude	
Cumulative Result	30	7	2	0	21	23

NSL for the cumulative baseline position and cumulative proposed position and the reduction factor with the balconies notionally removed

Resultant NSL (residential)						
	Total no. of rooms	>80% (satisfying BRE guidelines)	79.99 – 60%	59.99 – 40%	Less than 39.99%	Total that don't satisfy BRE
Existing cumulative baseline	21	15	3	2	1	6
Cumulative Result	21	6	1	8	6	15
Reduction in NSL (residential)						
	Total no. of rooms	0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction	30.1 – 40% reduction	>40.1% reduction	Total with reduction greater than 20%
Cumulative Result	21	6	1	4	10	15

445. The VSC and DD/NSL results with balconies notionally removed demonstrate some relatively minor differences when compared with the existing results. There would be no change to the sunlight PSH results. As such, the assessments of the magnitude of the changes and the significance of the impacts remains as set out above.

1 Peckham Park Road.

446. VSC for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant VSC (residential)						
	Total no. of windows	>27% (satisfying BRE guidelines)	26.99% - 20.00%	19.99% - 10.00%	9.99% - 0 %	Total that don't satisfy BRE
Existing baseline	7	4	3	0	0	3
Cumulative Result	7	0	0	7	0	7
Reduction in VSC (residential)						
	Total no. of windows	0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction Low magnitude	30.1 – 40% reduction Medium magnitude	>40.1% reduction High magnitude	Total that don't satisfy BRE
Cumulative Result	7	0	0	0	7	7

447. NSL for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant NSL (residential)							
	Total no. of rooms		>80% (satisfying BRE guidelines)	79.99 – 60%	59.99 – 40%	Less than 39.99%	Total that don't satisfy BRE
Existing cumulative baseline	4		4	0	0	0	0
Cumulative Result	4		2	1	1	0	2
Reduction in NSL (residential)							
	Total no. of rooms		0-20% reduction satisfying BRE guidelines)	20.1 – 30% reduction	30.1 – 40% reduction	>40.1% reduction	Total with reduction greater than 20%
Cumulative Result	4		2	1	1	0	2

448. A total of seven windows serving residential rooms were assessed for daylight impacts in this property. Four would be compliant with the BRE guidelines for VSC prior to the proposed development (cumulative existing baseline). None would be compliant following cumulative development. All would experience losses of a high magnitude, retaining 0.42 and 0.5 times their previous VSC values.

449. For DD/ NSL, a total of four residential rooms were tested. Prior to the proposed development all four would satisfy the BRE guidelines. Following development only two would. One of the other two, one would retain 0.71 times its previous DD/NSL value. The other would fall to 0.51 times its pervious value.

450. The daylight impact on this property would be of **high magnitude**, and given its sensitivity, this would result in an impact of **major significance**.

451. As none of the windows are within 90 degrees due south, no sunlight assessment (PSH measures) were taken for this property.

3 Peckham Park Road

452. VSC for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant VSC (residential)							
	Total no. of windows		>27% (satisfying BRE guidelines)	26.99% - 20.00%	19.99% - 10.00%	9.99% - 0 %	Total that don't satisfy BRE
Existing cumulative	4		4	0	0	0	0

baseline						
Cumulative Result	4		0	0	4	0
Reduction in VSC (residential)						
	Total no. of windows		0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction Low magnitude	30.1 – 40% reduction Medium magnitude	>40.1% reduction High magnitude
Cumulative Result	4		0	0	0	4

NSL for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant NSL (residential)						
	Total no. of rooms		>80% (satisfying BRE guidelines)	79.99 – 60%	59.99 – 40%	Less than 39.99%
Existing cumulative baseline	3		3	0	0	0
Cumulative Result	3		1	1	1	0
Reduction in NSL (residential)						
	Total no. of rooms		0-20% reduction (compliant with BRE)	20.1 – 30% reduction	30.1 – 40% reduction	>40.1% reduction
Cumulative Result	3		1	0	1	1

453. A total of four windows serving residential rooms were assessed for daylight impacts in this property. All four would satisfy the BRE guidelines for VSC prior to the proposed development. None would satisfy the BRE guidelines following cumulative development. They experience losses of a high magnitude, retaining 0.44 and 0.48 times their previous VSC values.
454. For DD/NSL, a total of three residential rooms were tested. Prior to the development all three would satisfy the BRE guidelines. Following development, one would satisfy the BRE guidelines. The others would retain 0.69 times and 0.60 times their previous values.
455. The daylight impact on this property would be of **high magnitude**, and given its sensitivity, this would result in an impact of **major significance**.

5 Peckham Park Road

456. VSC for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant VSC (residential)						
	Total no. of windows	>27% (satisfying BRE guidelines)	26.99% - 20.00%	19.99% - 10.00%	9.99% - 0%	Total that don't satisfy BRE
Existing cumulative baseline	4	4	0	0	0	0
Cumulative Result	4	0	0	4	0	4
Reduction in VSC (residential)						
	Total no. of windows	0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction Low magnitude	30.1 – 40% reduction Medium magnitude	>40.1% reduction High magnitude	Total that don't satisfy BRE
Cumulative Result	4	0	0	0	4	4

NSL for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant NSL (residential)						
	Total no. of rooms	>80% (satisfying BRE guidelines)	79.99 – 60%	59.99 – 40%	Less than 39.99%	Total that don't satisfy BRE
Existing cumulative baseline	4	4	0	0	0	0
Cumulative Result	4	0	1	2	1	4
Reduction in NSL (residential)						
	Total no. of rooms	0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction	30.1 – 40% reduction	>40.1% reduction	Total with reduction greater than 20%
Cumulative Result	4	0	0	1	3	4

457. A total of four windows serving residential rooms were assessed for daylight impacts in this property. All four would satisfy the BRE guidelines for VSC prior to the proposed development. None would be compliant following cumulative development. They would experience losses of a high magnitude, retaining 0.43 and 0.44 times their previous VSC values.

458. For NSL, a total of four residential rooms were tested. Prior to the development all four were BRE compliant. Following development, none would remain compliant. One would retain 0.63 times its previous value. The others would fall to between 0.38 and 0.52 times their previous values.
459. The daylight impact on this property would be of **high magnitude**, and given its sensitivity, this would result in an impact of **major significance**.
460. As none of the windows are within 90 degrees due south, no sunlight assessment (PSH measures) were taken for this property.

7 Peckham Park Road

461. VSC for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant VSC (residential)						
	Total no. of windows	>27% (satisfying BRE guidelines)	26.99% - 20.00%	19.99% - 10.00%	9.99% - 0 %	Total that don't satisfy BRE
Existing cumulative baseline	5	5	0	0	0	0
Cumulative Result	5	0	0	5	0	5
Reduction in VSC (residential)						
	Total no. of windows	0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction Low magnitude	30.1 – 40% reduction Medium magnitude	>40.1% reduction High magnitude	Total that don't satisfy BRE
Cumulative Result	5	0	0	0	5	5

462. NSL for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant NSL (residential)						
	Total no. of rooms	>80% (compliant with BRE)	79.99 – 60%	59.99 – 40%	Less than 39.99%	Total that don't satisfy BRE
Existing cumulative baseline	5	4	1	0	0	1
Cumulative Result	5	0	0	3	2	5
Reduction in NSL (residential)						
	Total no. of rooms	0-20% reduction (satisfying BRE)	20.1 – 30% reduction	30.1 – 40% reduction	>40.1% reduction	Total with reduction greater than 20%

			guidelines)				
Cumulative Result	5		0	0	0	5	5

463. A total of five windows serving residential rooms were assessed for daylight impacts in this property. All five would be compliant with the BRE guidelines for VSC prior to the proposed development. None would be compliant following cumulative development. They would experience losses of a high magnitude, retaining 0.44 and 0.48 times their previous VSC values.
464. For NSL, a total of five residential rooms were tested. Prior to the proposed development, four would satisfy the BRE guidelines. Following development, none would satisfy the BRE. All rooms would experience NSL losses of greater than 40%. They would retain between 0.30 and 0.46 times their previous values.
465. The daylight impact on this property would be of **high magnitude**, and given its sensitivity, this would result in an impact of **major significance**.
466. As none of the windows are within 90 degrees due south, no sunlight assessment (PSH measures) were taken for this property.

9 Peckham Park Road

467. VSC for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant VSC (residential)						
	Total no. of windows	>27% (satisfying BRE guidelines)	26.99% - 20.00%	19.99% - 10.00%	9.99% - 0 %	Total that don't satisfy BRE
Existing cumulative baseline	4	4	0	0	0	0
Cumulative Result	4	0	0	4	0	4
Reduction in VSC (residential)						
	Total no. of windows	0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction Low magnitude	30.1 – 40% reduction Medium magnitude	>40.1% reduction High magnitude	Total that don't satisfy BRE
Cumulative Result	4	0	0	0	4	4

468. NSL for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant NSL (residential)							
	Total no. of rooms		>80% (satisfying BRE guidelines)	79.99 – 60%	59.99 – 40%	Less than 39.99%	Total that don't satisfy BRE
Existing cumulative baseline	4		4	0	0	0	0
Cumulative Result	4		0	1	3	0	4
Reduction in NSL (residential)							
	Total no. of rooms		0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction	30.1 – 40% reduction	>40.1% reduction	Total with reduction greater than 20%
Cumulative Result	4		0	0	1	3	4

469. A total of four windows serving residential rooms were assessed for daylight impacts in this property. All four satisfy the BRE guidelines for VSC prior to the proposed development. None would satisfy the BRE following the proposed development. They would all experience losses of high magnitude, retaining between 0.46 and 0.48 times their previous VSC values.
470. For NSL, a total of four residential rooms were tested. Prior to the proposed development, all would satisfy BRE guidelines. Following development, none would satisfy the BRE. One would retain an NSL value of 0.66 times its former value. The others would fall to between 0.51 and 0.57 times their previous values.
471. The daylight impact on this property would be of **high magnitude**, and given its sensitivity, this would result in an impact of **major significance**.
472. Two of the windows are within 90 degrees due south and were therefore assessed for sunlight impacts. Both were compliant with BRE guidelines before the proposed development, and both would remain compliant following the proposed development. They would retain 40% and 33% APSH, which is a good level of annual sunlight, and 0.93 and 0.91 times their former values respectively. The overall annual loss would however be greater than 4% of APSH, so the BRE does suggest that the rooms may appear colder and less cheerful. Their winter sunlight levels would not change, remaining at 6% and 3%. Whilst the 3% is below the BRE recommendation of 5% WPSH, as this is the same as the existing condition, there would be no noticeable loss of winter sunlight caused by the proposed development.
473. The sunlight impact on this property would be of **low magnitude**, and given its sensitivity, this would result in an impact of **minor significance**.

11 Peckham Park Road

474. VSC for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant VSC (residential)						
	Total no. of windows	>27% (satisfying BRE guidelines)	26.99% - 20.00%	19.99% - 10.00%	9.99% - 0 %	Total that don't satisfy BRE
Existing cumulative baseline	6	2	2	2	0	4
Cumulative Result	6	0	0	6	0	6
Reduction in VSC (residential)						
	Total no. of windows	0-19.99% reduction (satisfying BRE guidelines)	20 – 29.9% reduction Low magnitude	30 – 39.9% reduction Medium magnitude	>40% reduction High magnitude	Total that don't satisfy BRE
Cumulative Result	6	0	0	4	2	6

475. NSL for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant NSL (residential)						
	Total no. of rooms	>80% (satisfying BRE guidelines)	79.99 – 60%	59.99 – 40%	Less than 39.99%	Total that don't satisfy BRE
Existing cumulative baseline	4	2	1	1	0	2
Cumulative Result	4	2	0	1	1	2
Reduction in NSL (residential)						
	Total no. of rooms	0-19.99% reduction (satisfying BRE guidelines)	20 – 29.9% reduction	30 – 39.9% reduction	>40% reduction	Total with reduction greater than 20%
Cumulative Result	4	2	1	0	1	2

476. A total of six windows serving residential rooms were assessed for daylight impacts in this property. Two would satisfy the BRE guidelines before the proposed development. None would satisfy the BRE following the proposed development. Two would retain a VSC that is 0.70 times its former value, two would retain VSC values of 0.66/0.63 times their former value, and two would retain values of 0.53/0.55 times their formal value. This represents losses of medium to high magnitude.

477. For NSL, a total of four residential rooms were tested. Prior to the proposed development, two would satisfy the BRE guidelines. Following development, this would remain the case, but all would experience losses. Two would retain 0.96 times their former value, which BRE considers would not be noticeable. The other would be reduced to 0.77 and 0.56 times their baseline value.
478. The daylight impact on this property would be of **medium to high magnitude**, and given its sensitivity, this would result in an impact of **moderate to major significance**.
479. As none of the windows are within 90 degrees due south, no sunlight assessment (PSH measures) were taken for this property.

13 Peckham Park Road

480. VSC for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant VSC (residential)						
	Total no. of windows	>27% (satisfying BRE guidelines)	26.99% - 20.00%	19.99% - 10.00%	9.99% - 0%	Total that don't satisfy BRE
Existing cumulative baseline	2	2	0	0	0	0
Cumulative Result	2	0	1	1	0	2
Reduction in VSC (residential)						
	Total no. of windows	0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction Low magnitude	30.1 – 40% reduction Medium magnitude	>40.1% reduction High magnitude	Total that don't satisfy BRE
Cumulative Result	2	0	0	0	2	2

481. NSL for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant NSL (residential)						
	Total no. of rooms	>80% (satisfying BRE guidelines)	79.99 – 60%	59.99 – 40%	Less than 39.99%	Total that don't satisfy BRE
Existing cumulative baseline	2	2	0	0	0	0
Cumulative Result	2	0	2	0	0	2
Reduction in NSL (residential)						
	Total no.	0-20%	20.1 –	30.1 –	>40.1%	Total with

	of rooms	reduction (satisfying BRE guidelines)	30% reduction	40% reduction	reduction	reduction greater than 20%
Cumulative Result	2	1	1	0	0	1

482. A total of two windows serving residential rooms were assessed for daylight impacts in this property. Both would satisfy the BRE VSC guidelines before the proposed development. The proposed development would result in both falling below the 27% VSC recommended, one to 20.17% (0.55 times former value) and one to 19.08% (0.58 times former value). These resultant VSC values are relatively good, but the perceived loss would be of a high magnitude.
483. For NSL, a total of two residential rooms were tested. Prior to the proposed development, both would satisfy the BRE guidelines with NSLs over 80%. Following the proposed development, both would fall below 80%, to 77.71% and 74.73%. For the former, this is 0.80 times its former value and therefore satisfies the BRE. The latter would suffer a slightly greater loss, but it would still retain 0.77 times its former value, a change that would be of low magnitude.
484. The daylight impact on this property would be of a **medium to high magnitude**, and given its sensitivity, this would result in an impact of **moderate to major significance**.
485. As none of the windows are within 90 degrees due south, no sunlight assessment (PSH measures) were taken for this property.

15 Peckham Park Road

486. VSC for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant VSC (residential)						
	Total no. of windows	>27% (satisfying BRE guidelines)	26.99% - 20.00%	19.99% - 10.00%	9.99% - 0 %	Total that don't satisfy BRE
Existing cumulative baseline	2	2	0	0	0	0
Cumulative Result	2	0	1	1	0	2
Reduction in VSC (residential)						
	Total no. of windows	0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction Low magnitude	30.1 – 40% reduction Medium magnitude	>40.1% reduction High magnitude	Total that don't satisfy BRE
Cumulative Result	2	0	0	1	1	0

487. NSL for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant NSL (residential)							
	Total no. of rooms		>80% (satisfying BRE guidelines)	79.99 – 60%	59.99 – 40%	Less than 39.99%	Total that don't satisfy BRE
Existing cumulative baseline	2		2	0	0	0	0
Cumulative Result	2		0	2	0	0	0
Reduction in NSL (residential)							
	Total no. of rooms		0-20% reduction (compliant with BRE)	20.1 – 30% reduction	30.1 – 40% reduction	>40.1% reduction	Total with reduction greater than 20%
Cumulative Result	2		0	2	0	0	2

488. A total of two windows serving residential rooms were assessed for daylight impacts in this property. Both would satisfy the BRE VSC guidelines before the proposed development. Following the proposed development, neither would satisfy the BRE, with resultant VSCs of 20.37 and 19.32. These resultant VSC values are relatively good, but the perceived loss would be of a moderate to high magnitude
489. For NSL, a total of two residential rooms were tested. Prior to the proposed development, both would be BRE compliant with an NSL over 80%. Following the proposed development neither would be BRE compliant. Resultant NSLs would be 68.7 and 68.42%, 0.73 and 0.71 times their former values respectively.
490. The daylight impact on this property would be of a **medium to high magnitude**, and given its sensitivity, this would result in an impact of **moderate to major significance**.
491. As none of the windows are within 90 degrees due south, no sunlight assessment (PSH measures) were taken for this property.

17 Peckham Park Road

492. VSC for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant VSC (residential)							
	Total no. of windows		>27% (satisfying BRE guidelines)	26.99% - 20.00%	19.99% - 10.00%	9.99% - 0%	Total that don't satisfy BRE
Existing cumulative baseline	4		4	0	0	0	0
Cumulative Result	4		0	2	2	0	4
Reduction in VSC (residential)							
	Total no. of windows		0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction Low magnitude	30.1 – 40% reduction Medium magnitude	>40.1% reduction High magnitude	Total that don't satisfy BRE
Cumulative Result	4		0	0	4	0	4

NSL for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant NSL (residential)							
	Total no. of rooms		>80% (satisfying BRE guidelines)	79.99 – 60%	59.99 – 40%	Less than 39.99%	Total that don't satisfy BRE
Existing cumulative baseline	4		4	0	0	0	0
Cumulative Result	4		2	2	0	0	2
Reduction in NSL (residential)							
	Total no. of rooms		0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction	30.1 – 40% reduction	>40.1% reduction	Total with reduction greater than 20%
Cumulative Result	4		2	2	0	0	2

493. A total of four windows serving residential rooms were assessed for daylight impacts in this property. All four would satisfy the BRE VSC guidelines before the proposed development. Following the proposed development, none would satisfy the BRE, although all would retain a VSC in excess of 19%. All four would retain over 0.60 times their former value (losses of medium magnitude).

494. For NSL, a total of four residential rooms were tested. Prior to the proposed development, all four would satisfy the BRE guidelines with NSL values over 80%. Following the proposed development, two would satisfy the BRE. The other two would fall just below 80%, at 75.63% and 78.39%. These would be 0.76 and 0.79 times their former values respectively.
495. The daylight impact on this property would be of a **medium magnitude**, and given its sensitivity, this would result in an impact of **moderate significance**.
496. As none of the windows are within 90 degrees due south, no sunlight assessment (PSH measures) were taken for this property.

19 Peckham Park Road

497. VSC for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant VSC (residential)						
	Total no. of windows	>27% (satisfying BRE guidelines)	26.99% - 20.00%	19.99% - 10.00%	9.99% - 0%	Total that don't satisfy BRE
Existing cumulative baseline	4	4	0	0	0	0
Cumulative Result	4	0	2	2	0	4
Reduction in VSC (residential)						
	Total no. of windows	0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction Low magnitude	30.1 – 40% reduction Medium magnitude	>40.1% reduction High magnitude	Total that don't satisfy BRE
Cumulative Result	4	0	0	4	0	4

NSL for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant NSL (residential)						
	Total no. of rooms	>80% (satisfying BRE guidelines)	79.99 – 60%	59.99 – 40%	Less than 39.99%	Total that don't satisfy BRE
Existing cumulative baseline	4	4	0	0	0	0
Cumulative Result	4	2	2	0	0	2
Reduction in NSL (residential)						
	Total no. of rooms	0-20% reduction (satisfying BRE)	20.1 – 30% reduction	30.1 – 40% reduction	>40.1% reduction	Total with reduction greater than 20%

			guidelines)				
Cumulative Result	4		2	2	0	0	2

498. A total of four windows serving residential rooms were assessed for daylight impacts in this property. All four would satisfy the BRE VSC guidelines before the proposed development. Following the proposed development, none would retain a VSC over 27%, but two would retain VSCs over 20% (21.33% and 21.45%). All four would retain between 0.63 and 0.65 times their former SC values, which is considered a loss of medium magnitude.
499. For NSL, a total of four residential rooms were tested. Prior to the proposed development, all four would satisfy BRE guidelines with NSL values over 80%. Following the proposed development, two would retain NSL values over 80%. The other two would retain 78.39% and 75.68% (0.79 and 0.76 times their former values).
500. The daylight impact on this property would be of a **low to medium magnitude**, and given its sensitivity, this would result in an impact of **minor to moderate significance**.
501. As none of the windows are within 90 degrees due south, no sunlight assessment (PSH measures) were taken for this property.

21 Peckham Park Road

502. VSC for the cumulative baseline position and cumulative proposed position and the reduction factor

Resultant VSC (residential)							
	Total no. of windows		>27% (satisfying BRE guidelines)	26.99% - 20.00%	19.99% - 10.00%	9.99% - 0 %	Total that don't satisfy BRE
Existing cumulative baseline	5		5	0	0	0	0
Cumulative Result	5		3	1	1	0	2
Reduction in VSC (residential)							
	Total no. of windows		0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction Low magnitude	30.1 – 40% reduction Medium magnitude	>40.1% reduction High magnitude	Total that don't satisfy BRE
Cumulative Result	5		3	0	2	0	2

503. NSL for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant NSL (residential)							
	Total no. of rooms		>80% (satisfying BRE guidelines)	79.99 – 60%	59.99 – 40%	Less than 39.99%	Total that don't satisfy BRE
Existing cumulative baseline	5		5	0	0	0	0
Cumulative Result	5		3	2	0	0	2
Reduction in NSL (residential)							
	Total no. of rooms		0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction	30.1 – 40% reduction	>40.1% reduction	Total with reduction greater than 20%
Cumulative Result	5		3	2	0	0	2

504. A total of five windows serving residential rooms were assessed for daylight impacts in this property. All five would satisfy the BRE VSC guidelines before the proposed cumulative development. Following the proposed cumulative development, three would satisfy the BRE, with VSCs over 27% and losses less than 20%. The remaining two would retain VSCs of 21.27% (0.65 times former value) and 19.69% (0.66 times former value).

505. For NSL, a total of five residential rooms were tested. Prior to the proposed cumulative development, all five would satisfy the BRE guidelines, with NSL values over 80%. Following the proposed cumulative development, three would retain an NSL over 80% and experience losses of less than 20%. Of the remaining two, one would retain an NSL of 71.19% (0.76 times its former value) and the other would retain an NSL of 70.65% (0.75 times its former value). These are relatively minor losses, not far below the 0.8 times former value recommended by the BRE.

506. The daylight impact on this property would be of a **medium magnitude**, and given its sensitivity, this would result in an impact of **moderate significance**.

507. Three windows, serving three different rooms would be within 90 degrees of due south and have therefore been assessed for PSH. All three rooms would retain APSH well in excess of 25% (51%, 52% and 53%). For two of these rooms this represents a loss of 1%. For one there is no change. They would also all exceed the 5% guidelines on WPSH, with two rooms retaining 17% and one retaining 19%. There would be no change in WPSH from the existing baseline cumulative condition.

508. The sunlight impact on this property would be of **negligible significance**.

6 Peckham Park Road

509. This is a three storey development with an extant planning consent for conversion to 3 flats and a studio with two flats on the ground and first floors facing the application site. At the time of assessment, the extant permission was under construction.
510. VSC for the cumulative baseline position and cumulative proposed position and the reduction factor:

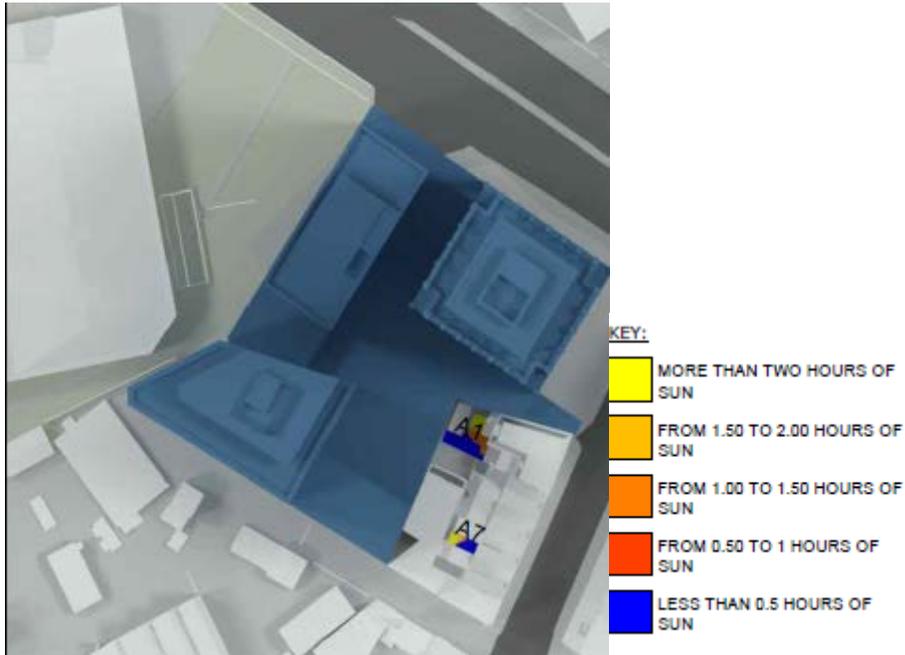
Resultant VSC (residential)							
	Total no. of windows		>27% (satisfying BRE guidelines)	26.99% - 20.00%	19.99% - 10.00%	9.99% - 0 %	Total that don't satisfy BRE
Existing cumulative baseline	11		1	7 (inc. 2 non habitable)	3 (inc. 1 non habitable)	0	10 (inc. 3 non habitable)
Cumulative Result	11		0	0	2 (both non habitable)	9 (inc. 1 non habitable)	11 (inc. 3 non habitable)
Reduction in VSC (residential)							
	Total no. of windows		0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction Low magnitude	30.1 – 40% reduction Medium magnitude	>40.1% reduction High magnitude	Total that don't satisfy BRE
Cumulative Result	11		2 (both non habitable)	0	0	9 (inc. 1 non habitable)	9 inc. 1 non habitable)

NSL for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant NSL (residential)							
	Total no. of rooms		>80% (compliant with BRE)	79.99 – 60%	59.99 – 40%	Less than 39.99%	Total that don't satisfy BRE
Existing cumulative baseline	7		4	2	1 (inc. 1 non habitable)	0	3 (inc. 1 non habitable)
Cumulative Result	7		0	0	0	7 (inc. 1 non habitable)	7 (inc. 1 non habitable)
Reduction in NSL (residential)							
	Total no. of rooms		0-20% reduction (compliant with BRE)	20.1 – 30% reduction	30.1 – 40% reduction	>40.1% reduction	Total with reduction greater than 20%
Cumulative Result	7		0	0	0	7 (inc. 1 non habitable)	7 (inc. 1 non habitable)

511. A total of 11 windows serving residential rooms were assessed for daylight impacts in this property. Three of these would serve a hallway, which is not a habitable room, and has therefore been discounted from the following commentary. Only one habitable room window would satisfy the BRE guidelines for VSC prior to the proposed development. None would satisfy the BRE following the proposed development. The resultant VSCs for the habitable rooms would be between 0.01% and 7.39%. These are very low VSC values, and all would have experienced losses of a high magnitude, retaining between 0.00 (rounded down) and 0.23 times their former VSC values.
512. For DD/NSL, a total of seven residential rooms were tested. Prior to the development, four would satisfy the BRE guidelines. Discounting the hallway, because it is not a habitable room, the resultant NSL values for the six remaining rooms would range from 1.99% to 18.71%. One would retain 0.25 times its previous value. The others would fall to between 0.02 and 0.07 times their previous values.
513. The daylight impact on this property would be of **high magnitude**, and given its sensitivity, this would result in an impact of **major significance**.
514. Only the non habitable hallway is within 90 degrees due south. As it is not a habitable room, the PSH results are not presented here.
515. The rear garden for the extant planning permission at 6 Peckham Park Road has been assessed for overshadowing, using the Sun On Ground test. In both the existing and proposed conditions, this space would not satisfy the BRE guidelines for at least 50% of the area to receive at least 2 hours of sunlight on 21st March each year. Prior to development, 15% (5.60 sqm) would receive 2 hours of sunlight on March 21st. Following development, 13% (4.76 sqm) would receive 2 hours of sunlight on March 21st. This is however, 0.85 times its former value, which is in line with the BRE guidelines.
516. The overshadowing impact on these amenity spaces would be of **negligible magnitude**, resulting in an impact of **negligible significance**.

Figure: Sun on Ground results at 6 Peckham Park Road (A1) (proposed)



8 Peckham Park Road

517. VSC for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant VSC (residential)						
	Total no. of windows	>27% (satisfying BRE guidelines)	26.99% - 20.00%	19.99% - 10.00%	9.99% - 0 %	Total that don't satisfy BRE
Existing cumulative baseline	1	0	1	0	0	0
Cumulative Result	1	0	0	0	1	1
Reduction in VSC (residential)						
	Total no. of windows	0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction Low magnitude	30.1 – 40% reduction Medium magnitude	>40.1% reduction High magnitude	Total that don't satisfy BRE
Cumulative Result	1	0	0	0	1	1

518. NSL for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant NSL (residential)							
	Total no. of rooms		>80% (satisfying BRE guidelines)	79.99 – 60%	59.99 – 40%	Less than 39.99%	Total that don't satisfy BRE
Existing cumulative baseline	1		0	1	0	0	1
Cumulative Result	1		0	0	0	1	1
Reduction in NSL (residential)							
	Total no. of rooms		0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction	30.1 – 40% reduction	>40.1% reduction	Total with reduction greater than 20%
Cumulative Result	1		0	0	0	1	1

519. One window was assessed for daylight impacts in this property. It would not satisfy the BRE guidelines for VSC prior to the proposed development or after it. It would experience a loss of high magnitude, resulting in a VSC of 5.12%, which is 0.22 times its former value.
520. For NSL, one residential room was tested. Prior to the proposed development, it would not be BRE compliant. Following development, this would remain the case, but it would also experience NSL loss of greater than 40%. Its NSL would be 9.58%, which is 0.15 times its former value.
521. The daylight impact on this property would be of **high magnitude**, and given its sensitivity, this would result in an impact of **major significance**.
522. As none of the windows are within 90 degrees due south, no sunlight assessment (PSH measures) were taken for this property.

Image: 8-10 Peckham Park Road rear windows outlined in red



10 Peckham Park Road

523. VSC for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant VSC (residential)						
	Total no. of windows	>27% (satisfying BRE guidelines)	26.99% - 20.00%	19.99% - 10.00%	9.99% - 0 %	Total that don't satisfy BRE
Existing cumulative baseline	2	1 (non habitable)	1	0	0	1
Cumulative Result	2	0	0	0	2 (inc. 1 non habitable)	2 (inc. 1 non habitable)
Reduction in VSC (residential)						
	Total no. of windows	0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction Low magnitude	30.1 – 40% reduction Medium magnitude	>40.1% reduction High magnitude	Total that don't satisfy BRE
Cumulative Result	2	0	0	0	2 (inc. 1 non habitable)	2 (inc. 1 non habitable)

524. NSL for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant NSL (residential)							
	Total no. of rooms		>80% (compliant with BRE)	79.99 – 60%	59.99 – 40%	Less than 39.99%	Total that don't satisfy BRE
Existing cumulative baseline	2		0	1	1 (inc. 1 non habitable)	0	2 (inc. 1 non habitable)
Cumulative Result	2		0	0	0	2 (inc. 1 non habitable)	2 (inc. 1 non habitable)
Reduction in NSL (residential)							
	Total no. of rooms		0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction	30.1 – 40% reduction	>40.1% reduction	Total with reduction greater than 20%
Cumulative Result	2		0	0	0	2 (inc. 1 non habitable)	2 (inc. 1 non habitable)

525. A total of two windows serving residential rooms were assessed for daylight impacts in this property. One of these is identified as non habitable. The remaining habitable room window would retain a VSC of 24.27% after the proposed development is built. Although this is not far below the 27% recommended by the BRE guidelines, it is 0.37 times the former VSC value, which is a reduction of high magnitude.

526. For NSL, two residential rooms were tested, but one is identified as non habitable. The remaining habitable room would retain an NSL value of 8.22%, which is very low and only 0.10 times its former value.

527. The daylight impact on this property would be of **high magnitude**, and given its sensitivity, this would result in an impact of **major significance**.

528. As none of the windows are within 90 degrees due south, no sunlight assessment (PSH measures) were taken for this property.

12 Peckham Park Road

529. VSC for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant VSC (residential)						
	Total no. of windows	>27% (satisfying BRE guidelines)	26.99% - 20.00%	19.99% - 10.00%	9.99% - 0%	Total that don't satisfy BRE
Existing cumulative baseline	2	0	1	1	0	2
Cumulative Result	2	0	0	1	1	2
Reduction in VSC (residential)						
	Total no. of windows	0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction Low magnitude	30.1 – 40% reduction Medium magnitude	>40.1% reduction High magnitude	Total that don't satisfy BRE
Cumulative Result	2	0	0	0	2	2

530. NSL for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant NSL (residential)						
	Total no. of rooms	>80% (satisfying BRE guidelines)	79.99 – 60%	59.99 – 40%	Less than 39.99%	Total that don't satisfy BRE
Existing cumulative baseline	2	1	1	0	0	1
Cumulative Result	2	1	1	0	1	2
Reduction in NSL (residential)						
	Total no. of rooms	0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction	30.1 – 40% reduction	>40.1% reduction	Total with reduction greater than 20%
Cumulative Result	2	0	0	1	1	2

531. A total of two windows serving residential rooms were assessed for daylight impacts in this property. Neither would satisfy the BRE guidelines before the proposed development. The proposed development would result in losses of a high magnitude for both, with one retaining 0.53 times its former value, and one retaining 0.25 times its former value.

532. For NSL, a total of two residential rooms were tested. Prior to the proposed development,

one would be BRE compliant with NSL over 80%. The other would be just below the recommended level, at 74.86%. Both would experience losses as a result of the development. One would retain a NSL of 61.38%, which is 0.7 times its former value. The other would retain an NSL of 10.38%, only 0.14 times its former value

533. The daylight impact on this property would be of a **high magnitude**, and given its sensitivity, this would result in an impact of **major significance**.
534. One of the windows is within 90 degrees of due south and has therefore been tested for PSH. Prior to the proposed development, it received 44% APSH. Following development, it would receive 25%, which satisfies the BRE guidelines. It should however be noted that this would be 0.56 times its former value, which would be a loss of high magnitude. It can be concluded that, although the loss of sunlight would be very noticeable, the resultant levels of sunlight would remain good. The overall annual loss would however be greater than 4% of APSH, so the BRE does suggest that the rooms may appear colder and less cheerful. In terms of WPSH, in the existing cumulative baseline the room would receive 6% of the available sunlight, which satisfies the BRE guidelines. Following the development this would be reduced to 1%, which is 0.16 times its former value and represents a loss of high magnitude.
535. The sunlight impacts on this property would be of a **high magnitude** in winter, but a **moderate magnitude** across the whole year. Given the sensitivity of the receptor, this equates to changes of **moderate to major significance**.
536. The rear garden at 12 Peckham Park Road has been assessed for overshadowing, using the Sun On Ground test. In neither the existing and proposed conditions would this space satisfy the BRE guidelines for at least 50% of the area to receive at least 2 hours of sunlight on 21st March each year. The area to receive 2 hours of sunlight on 21st March each year would actually increase though. Prior to development, 26% (2.94 sqm) would receive 2 hours of sunlight on March 21st. Following development, 27% (3 sqm) would receive 2 hours of sunlight on March 21st. This is however, 1.02 times its former value, which is in line with the BRE guidelines.
537. The overshadowing impact on these amenity spaces would be of **negligible magnitude**, resulting in an impact of **negligible significance**.

Image: Sun on Ground results at 12 Peckham Park Road (A7) (proposed)

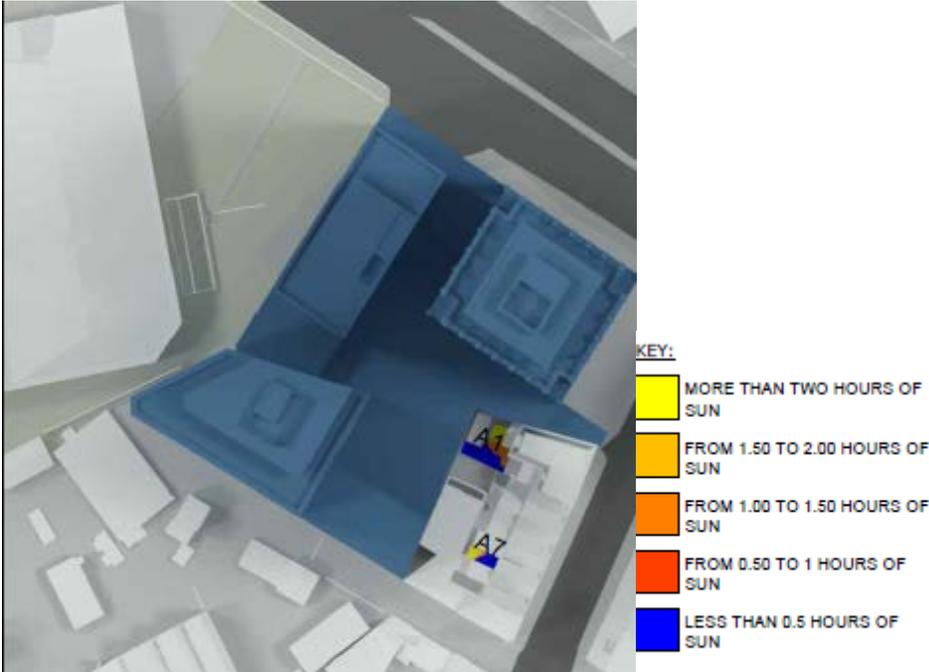


Image: 12-14 Peckham Park Road rear windows outlined in red



14 Peckham Park Road

538. VSC for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant VSC (residential)						
	Total no. of windows	>27% (satisfying BRE guidelines)	26.99% - 20.00%	19.99% - 10.00%	9.99% - 0 %	Total that don't satisfy BRE
Existing cumulative baseline	2	0	1	1	0	2
Cumulative Result	2	0	0	0	2	2
Reduction in VSC (residential)						
	Total no. of windows	0-20% reduction (satisfying BRE)	20.1 – 30% reduction Low	30.1 – 40% reduction Medium magnitude	>40.1% reduction High	Total that don't satisfy BRE

		guidelines)	magnitude		magnitude	
Cumulative Result	2	0	0	0	2	2

539. NSL for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant NSL (residential)						
	Total no. of rooms	>80% (satisfying BRE guidelines)	79.99 – 60%	59.99 – 40%	Less than 39.99%	Total that don't satisfy BRE
Existing cumulative baseline	2	1	1	0	0	1
Cumulative Result	2	0	0	0	2	2
Reduction in NSL (residential)						
	Total no. of rooms	0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction	30.1 – 40% reduction	>40.1% reduction	Total with reduction greater than 20%
Cumulative Result	2	0	0	0	2	2

540. A total of two windows serving residential rooms were assessed for daylight impacts in this property. Neither would satisfy the BRE VSC guidelines before the proposed development. The proposed development would result in losses of high magnitude to both, with resultant VSCs of and 2.32 and 1.87 (0.10 and 0.11 times the baseline results respectively.)

541. For NSL, a total of two residential rooms were tested. Prior to the proposed development, one would satisfy the BRE guidelines with an NSL over 80% and the other would be slightly below at 75.67%. Both would experience losses of high magnitude, resulting in NSLs of 2.5% and 4.36%, which would be 0.02 and 0.05 times their former values respectively.

542. The daylight impact on this property would be of a **high magnitude**, and given its sensitivity, this would result in an impact of **major significance**.

543. One of the windows in this property is within 90 degrees of due south, and was therefore tested for PSH. Prior to the proposed development, it would receive 35% APSH. Following development, it would receive 3%, which is a loss of high magnitude, resulting in only 0.08 times its former value. In terms of WPSH, in the existing cumulative baseline the room would receive only 1% of the available sunlight, which would not satisfy the BRE guidelines. This would be reduced to 0% once the proposed development is constructed.

544. The sunlight impact on this property would be of a **high magnitude**, and given its sensitivity, this would result in an impact of **major significance**.

16 Peckham Park Road

545. There is an extant planning consent on this site to provide a new part three, part four storey

building including retail at ground and five residential units above (18/AP/0564). This would have windows facing the development under consideration here. As such, the impacts on both the existing and proposed building have been assessed.

546. In terms of the existing property, the proposed development would only impact daylight within the bedroom at first floor. Here there would be a VSC reduction of 51%, representing a loss of high magnitude. In terms of NSL, following cumulative development, the bedroom would have an NSL of 69%, a reduction of 11% from the existing position. As more than 0.8 times the former NSL value would be retained however, the BRE would advise that this change is likely to be unnoticeable.
547. As per the BRE guidelines, the most appropriate test for the consented new building on the site is the ADF test. The ADF results in the cumulative context, for the rooms that would face the application site would be as follows:

Table: 16 Peckham Park Road ADF results

Floor	Use	ADF
First	Bedroom	0.18
First	Bedroom	0.25
Second	Bedroom	0.22
Second	Bedroom	0.31
Third	Bedroom	0.50
Third	Bedroom	0.86

548. None of the six bedrooms tested would meet the ADF target value of 1%, although it should be noted that 3 out of the 6 rooms would not meet that target value in the cumulative existing baseline position either.
549. In response to an objection from the landowner at 16 Peckham Park Road and 1 Livesey Place, the applicant submitted additional daylight and sunlight analysis showing the impact to all rooms and windows within the consented development as though it were built in the surrounding context as existing.
550. In daylight terms, 14 out of the 20 windows within the consented scheme would retain at least 27% VSC or at least 0.80 times their baseline value and would therefore satisfy the recommended levels within the BRE Guidelines. There are six bedrooms that would lose greater than 20% of their daylight when compared with the existing baseline position. Two of them would be overhung by balconies. All six would all be located in flats where the main living rooms would receive high levels of daylight with windows receiving in excess of 35% VSC and rooms with at least 96% NSL.
551. In relation to bedrooms, paragraph 2.2.8 of the BRE Guidelines states “Bedrooms should also be analysed, although they are less important”. Given the proximity of these windows in the consented scheme to the application site, the applicant’s consultant also considers that they represent a ‘bad neighbour’ relationship and that reduction in daylight beyond the recommendations in the BRE Guidelines are unavoidable in such circumstances. They also note that the consented development itself causes significant reductions in daylight in particular to windows serving habitable rooms on the first floor of No. 12 and No. 14 Peckham Park Road.

552. In terms of DD/NSL, 5 out of the 11 rooms within the consented scheme would retain at least 80% of their existing values. The six bedrooms would lose greater than 20% of their existing NSL..

553. For sunlight, all windows in the consented scheme would satisfy the BRE Guidelines with at least 56% APSH (significantly above the 25% recommended) and at least 18% WPSH (also significantly higher than the 5% recommended).

Image: 16 Peckham Park Road as existing (site outlined in red)



18 Peckham Park Road

554. VSC for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant VSC (residential)						
	Total no. of windows	>27% (satisfying BRE guidelines)	26.99% - 20.00%	19.99% - 10.00%	9.99% - 0 %	Total that don't satisfy BRE
Existing cumulative baseline	3	2	1	0	0	1
Cumulative Result	3	0	0	2	1	3
Reduction in VSC (residential)						
	Total no. of windows	0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction Low magnitude	30.1 – 40% reduction Medium magnitude	>40.1% reduction High magnitude	Total that don't satisfy BRE

Cumulative Result	3	0	0	0	3	3
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555. NSL for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant NSL (residential)						
	Total no. of rooms	>80% (satisfying BRE guidelines)	79.99 – 60%	59.99 – 40%	Less than 39.99%	Total that don't satisfy BRE
Existing cumulative baseline	3	3	0	0	0	0
Cumulative Result	3	0	1	1	1	3
Reduction in NSL (residential)						
	Total no. of rooms	0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction	30.1 – 40% reduction	>40.1% reduction	Total with reduction greater than 20%
Cumulative Result	3	0	1	0	2	3

556. A total of three windows serving residential rooms were assessed for daylight impacts in this property. One would not satisfy the BRE VSC guidelines before the proposed development. Following the proposed development, none would satisfy the BRE, and all would experience losses of high magnitude. Resultant VSCs would be 9.03%, 12.39% and 15.76%, which would be 0.37, 0.45 and 0.46 times their former values.

557. For NSL, a total of three residential rooms were tested. Prior to the proposed development, all three would satisfy the BRE guidelines with NSL values over 80%. Following the proposed development, none would retain an NSL over 80%. One would retain 66.79% (0.70 times its former value). The other two would fall to 41.93 and 36.84%, which would be 0.47 and 0.37 times their former value respectively.

558. The daylight impact on this property would be of a **high magnitude**, and given its sensitivity, this would result in an impact of **major significance**.

559. As none of the residential windows are within 90 degrees due south, no sunlight assessment (PSH measures) were taken for this property.

Image: 18 Peckham Park Rd. (Obscured window on the first floor outlined in red)



Image: 18 Peckham Park Road (obscured window on the first floor outlined in red)



Image: 18-24 Peckham Park Rd (Rear, obstructed windows at No.18 outlined in red)



20 Peckham Park Road

560. VSC for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant VSC (residential)						
	Total no. of windows	>27% (satisfying BRE guidelines)	26.99% - 20.00%	19.99% - 10.00%	9.99% - 0 %	Total that don't satisfy BRE
Existing cumulative baseline	2	1	0	1 (non habitable)	0	1 (non habitable)
Cumulative Result	2	0	0	1	1 (non habitable)	2 (inc. 1 non habitable)
Reduction in VSC (residential)						
	Total no. of windows	0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction Low magnitude	30.1 – 40% reduction Medium magnitude	>40.1% reduction High magnitude	Total that don't satisfy BRE
Cumulative Result	2	0	0	0	2 (inc. 1 non habitable)	2 (inc. 1 non habitable)

561. NSL for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant NSL (residential)							
	Total no. of rooms		>80% (satisfying BRE guidelines)	79.99 – 60%	59.99 – 40%	Less than 39.99%	Total that don't satisfy BRE
Existing cumulative baseline	2		2 (inc. 1 non habitable)	0	0	0	0
Cumulative Result	2		0	1	1(non habitable)	0	2 (inc. 1 non habitable)
Reduction in NSL (residential)							
	Total no. of rooms		0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction	30.1 – 40% reduction	>40.1% reduction	Total with reduction greater than 20%
Cumulative Result	2		0	0	0	2 (inc. 1 non habitable)	2 (inc. 1 non habitable)

562. A total of two windows serving residential rooms were assessed for daylight impacts in this property. One is identified as non habitable and therefore discounted from this commentary. The remaining window would satisfy the BRE VSC guidelines before the proposed cumulative development, but would fall to a VSC of 14.06% with the cumulative development in place. This represents 0.43 times its former VSC value, which is a loss of high magnitude.
563. For NSL, a total of two residential rooms were tested. As noted above, one is non habitable. The remaining habitable room would retain an NSL of 72.97%, which is 0.74 times its former value. This is a relatively minor loss.
564. The daylight impact on this property would be of a **moderate to high magnitude**, and given its sensitivity, this would result in an impact of **moderate to major significance**.
565. As none of the windows are within 90 degrees due south, no sunlight assessment (PSH measures) were taken for this property.

22 Peckham Park Road

566. VSC for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant VSC (residential)							
	Total no. of windows		>27% (satisfying BRE guidelines)	26.99% - 20.00%	19.99% - 10.00%	9.99% - 0 %	Total that don't satisfy BRE
Existing cumulative baseline	5		3 (inc. 1 non habitable)	2 (inc. 1 non habitable)	0	0	2 (inc. 1 non habitable)
Cumulative Result	5		0	0	3 (inc. 1 non habitable)	2 (inc. 1 non habitable)	5 (inc. 2 non habitable)
Reduction in VSC (residential)							
	Total no. of windows		0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction Low magnitude	30.1 – 40% reduction Medium magnitude	>40.1% reduction High magnitude	Total that don't satisfy BRE
Cumulative Result	5		0	0	0	5	5 (inc. 2 non habitable)

567. NSL for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant NSL (residential)							
	Total no. of rooms		>80% (satisfying BRE guidelines)	79.99 – 60%	59.99 – 40%	Less than 39.99%	Total that don't satisfy BRE
Existing cumulative baseline	4		4 (inc. 2 non habitable)	0	0	0	0
Cumulative Result	4		0	2 (both non habitable)	2	0	4 (inc. 2 non habitable)
Reduction in NSL (residential)							
	Total no. of rooms		0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction	30.1 – 40% reduction	>40.1% reduction	Total with reduction greater than 20%
Cumulative Result	4		0	2 (both non habitable)	0	2	4 (inc. 2 non habitable)

568. A total of five windows serving residential rooms were assessed for daylight impacts in this property. Two have been identified as non habitable. For the remaining three windows serving habitable rooms, two would satisfy the BRE guidelines prior to the proposed development, with VSCs over 27%. The other would have a VSC of 22.7%. Following the proposed development, all three would be reduced to VSCs below 15%: 13.92%, 11.85% and 8.15%. They would be 0.45, 0.41 and 0.35 times their former values respectively, which represents losses of high magnitude.
569. For DD/NSL, a total of four residential rooms were tested. Two are identified as non habitable. Of the remaining two habitable rooms, prior to the proposed development, both would satisfy the BRE guidelines. With the proposed cumulative development in place, neither room would satisfy the BRE, with NSL values of 53.87% (0.56 times former value) and 50.03% (0.52 times former value).
570. The daylight impact on this property would be of a **high magnitude**, and given its sensitivity, this would result in an impact of **major significance**.
571. As none of the windows are within 90 degrees due south, no sunlight assessment (PSH measures) were taken for this property.

24 Peckham Park Road

572. VSC for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant VSC (residential)						
	Total no. of windows	>27% (satisfying BRE guidelines)	26.99% - 20.00%	19.99% - 10.00%	9.99% - 0 %	Total that don't satisfy BRE
Existing cumulative baseline	2	1	1	0	0	1
Cumulative Result	2	0	0	2	0	2
Reduction in VSC (residential)						
	Total no. of windows	0-20% reduction (satisfying BRE guidelines)	20.1 – 40% reduction Low magnitude	30.1 – 40% reduction Medium magnitude	>40.1% reduction High magnitude	Total that don't satisfy BRE
Cumulative Result	2	0	0	1	1	2

573. NSL for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant NSL (residential)							
	Total no. of rooms		>80% (satisfying BRE guidelines)	79.99 – 60%	59.99 – 40%	Less than 39.99%	Total that don't satisfy BRE
Existing cumulative baseline	2		1	1	0	0	1
Cumulative Result	2		0	1	1	0	2
Reduction in NSL (residential)							
	Total no. of rooms		0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction	30.1 – 40% reduction	>40% reduction	Total with reduction greater than 20%
Cumulative Result	2		0	1	1	0	2

574. A total of two windows serving residential rooms were assessed for daylight impacts in this property. One would satisfy with the BRE VSC guidelines prior to the proposed cumulative development, with a VSC of 31.15%. The other would have a VSC of 24.55%. These VSCs would reduce to 17.88% (0.57 times former value) and 16.14% (0.65 times former value) respectively with the cumulative development in place.

575. For NSL, a total of two residential rooms were tested. Prior to the proposed cumulative development, one would satisfy the BRE guidelines with an NSL of 81.72%. The other would have an NSL of 76.44%. As a result of the proposed development, they would reduce to 64.6% (0.79 times former value) and 53.22% (0.69 times former value) respectively.

576. The daylight impact on this property would be of a **medium to high magnitude**, and given its sensitivity, this would result in an impact of **moderate to major significance**.

577. As none of the windows are within 90 degrees due south, no sunlight assessment (PSH measures) were taken for this property.

24 Peckham Park Road

578. VSC for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant VSC (residential)							
	Total no. of windows		>27% (satisfying BRE guidelines)	26.99% - 20.00%	19.99% - 10.00%	9.99% - 0 %	Total that don't satisfy BRE
Existing	2		1	1	0	0	1

cumulative baseline							
Cumulative Result	2		0	0	2	0	2
Reduction in VSC (residential)							
	Total no. of windows		0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction Low magnitude	30.1 – 40% reduction Medium magnitude	>40.1% reduction High magnitude	Total that don't satisfy BRE
Cumulative Result	2		0	0	1	1	2

579. NSL for the cumulative baseline position and cumulative proposed position and the reduction factor

Resultant NSL (residential)							
	Total no. of rooms		>80% (satisfying BRE guidelines)	79.99 – 60%	59.99 – 40%	Less than 39.99%	Total that don't satisfy BRE
Existing cumulative baseline	2		1	1	0	0	1
Cumulative Result	2		0	1	1	0	2
Reduction in NSL (residential)							
	Total no. of rooms		0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction	30.1 – 40% reduction	>40.1% reduction	Total with reduction greater than 20%
Cumulative Result	2		0	1	1	0	2

580. A total of two windows serving residential rooms were assessed for daylight impacts in this property. One would satisfy with the BRE VSC guidelines prior to the proposed cumulative development, with a VSC of 31.15%. The other would have a VSC of 24.55%. These VSCs would reduce to 17.88% (0.57 times former value) and 16.14% (0.65 times former value) respectively with the proposed cumulative development in place.

581. For NSL, a total of two residential rooms were tested. Prior to the proposed cumulative development, one would satisfy the BRE guidelines with an NSL of 81.72%. The other would have an NSL of 76.44%. As a result of the proposed cumulative development, they would reduce to 64.6% (0.79 times former value) and 53.22% (0.69 times former value) respectively.

582. The daylight impact on this property would be of a **low to medium magnitude**, and given its sensitivity, this would result in an impact of **minor to moderate significance**.

583. As none of the windows are within 90 degrees due south, no sunlight assessment (PSH measures) were taken for this property.

Lewes House

584. VSC for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant VSC (residential)							
	Total no. of windows		>27% (satisfying BRE guidelines)	26.99% - 20.00%	19.99% - 10.00%	9.99% - 0 %	Total that don't satisfy BRE
Existing cumulative baseline	162 (76 non habitable)		25 (8 non habitable)	15 (4 non habitable)	18 (4 non habitable)	104 (60 non habitable)	137 (68 non habitable)
Cumulative Result	162 (76 non habitable)		7 (3 non habitable)	19 (1 non habitable)	24 (10 non habitable)	112 (62 non habitable)	155 (73 non habitable)
Reduction in VSC (residential)							
	Total no. of windows		0-20% reduction (satisfying BRE guidelines)	20.01 – 30% reduction Los magnitude	30.01 – 40% reduction Medium magnitude	>40.01% reduction High magnitude	Total that don't satisfy BRE
Cumulative Result	162 (inc 76 non habitable)		51 (21 non habitable)	32 (11 non habitable)	23 (8 non habitable)	56 (36 non habitable)	111 (55 non habitable)

585. NSL for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant NSL (residential)							
	Total no. of rooms		>80% (satisfying BRE guidelines)	79.99 – 60%	59.99 – 40%	Less than 39.99%	Total that don't satisfy BRE
Existing cumulative baseline	78 (38 non habitable)		42 (20 non habitable)	16 (8 non habitable)	10 (4 non habitable)	10 (6 non habitable)	36 (18 non habitable)
Cumulative Result	78 (38 non habitable)		30 (10 non habitable)	17 (11 non habitable)	16 (9 non habitable)	15 (8 non habitable)	48 (28 non habitable)
Reduction in NSL (residential)							
	Total no. of rooms		0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction	30.1 – 40% reduction	>40.1% reduction	Total with reduction greater than 20%
Cumulative	78 (38)		63 (25 non habitable)	10 (8 non habitable)	5 (all non habitable)	0	15 (13 non habitable)

Result	non habitable)		habitable)	habitable)	habitable)		habitable)
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586. A total of 162 windows serving residential rooms were assessed for daylight impacts in this property. 76 of these have been identified as non habitable. Of the 86 serving habitable rooms, 20 would satisfy the BRE VSC guidelines prior to the proposed cumulative development. 44 would already have a very low VSC, under 10%. Following the proposed development, only four would satisfy the VSC guidance and 50 would have a VSC of less than 10%. When the losses are considered as a ratio of the existing condition, 30 of the windows serving habitable rooms would still be at least 0.8 times their former value, and therefore in line with the BRE guidelines. 21 would experience losses of a low magnitude, 15 would experience losses of a medium magnitude and 20 would experience losses of high a magnitude.
587. For NSL, a total of 78 residential rooms were tested. 38 of these have been identified as non habitable. Prior to the proposed cumulative development, of the 40 habitable rooms tested, 22 would satisfy the BRE guidance with an NSL of at least 80%. Following the proposed cumulative development, 20 of the habitable rooms would retain an NSL of 80% or more. The others would experience losses of sunlight, but for 38 of the 40 habitable rooms, this loss would be less than 20 and therefore in line with the BRE guidelines. The remaining two would retain at least 0.70 times their former value.
588. The daylight impacts on this property would vary, but on balance would be of a **medium magnitude**, and given its sensitivity, this would result in an impact of **moderate significance**.
589. 49 windows would be within 90 degrees of due south, and have therefore been tested for PSH. 20 of the windows tested have been identified as serving non habitable rooms.
590. APSH for the cumulative baseline position and cumulative proposed position and the reduction factor:

	No. of windows	Total APSH				Reduction in APSH			
		>25% (satisfy BRE)	20-24.9%	10-19.99%	> 9.99%	0.-20% reduction (satisfy BRE)	20.1-30% reduction (low magnitude)	30.1-40% reduction (medium magnitude)	>40.1% reduction (high magnitude)
Ex.	49 (20 non hab)	13 (3 non hab)	2	10 (4 non hab)	24 (13non hab)				
Pr.	49 (20 non hab)	12 (3 non hab)	1	8 (4 non hab)	28 (13non hab)	29 (13 non hab)	5 (2 non hab)	5 (2 non hab)	10 (3 non hab)

591. WPSH for the cumulative baseline position and cumulative proposed position and the reduction factor:

	No. of windows	Total WPSH				Reduction in WPSH			
		>5% (satisfy BRE)	4-4.9%	3-3.9%	> 2.99%	0.-20% reduction (satisfy BRE)	20.1-30% reduction (low magnitude)	30.1-40% reduction (medium magnitude)	>40.1% reduction (high magnitude)
Ex.	49 (20 non hab)	15 (5 non hab)	1	3 (1 non hab)	30 (14 non hab)				

	non hab)	non hab)		non hab)	non hab)				
Pr.	49 (20 non hab)	15 (5 non hab)	1	3 (1 non hab)	30 (14 non hab)	49 (20 non hab)			

592. Prior to the proposed cumulative development, 10 of the habitable rooms would receive at least 25% APSH, which satisfies the BRE guidelines. 11 would receive low APSH of less than 10%. Following the proposed cumulative development, nine windows would satisfy the guidelines for APSH, while 15 would receive very low APSH of less than 10%. When the losses are considered as a ratio of the existing cumulative condition, 16 would retain at least 0.8 times their former value, which the BRE guidelines suggest would be unnoticeable. Seven would experience a loss of high magnitude.
593. When considering WPSH, there would be no change to any of the windows following the proposed cumulative development, so although 19 would not receive the 5% WPSH recommended by the BRE, they would also retain 100% of their former value.
594. The annual sunlight impacts on this property would vary, but on balance would be of **medium to high magnitude**, and given its sensitivity, this would result in an impact of **moderate to major significance**. The winter sunlight impacts would be of no significance.
595. There are existing balconies over windows at Lewes House. As set out above, the BRE guidance advises that because balconies cut out light from the top part of the sky, even a modest obstruction may result in a large relative effect on the daylight and sunlight received. The BRE guidelines therefore go on to advise that one way to demonstrate the impacts of existing balconies and overhangs is to carry out additional calculations, for both the existing and proposed situations, without the balconies in place. This analysis has been undertaken at Lewes House, and the results are summarised below.
596. VSC for the cumulative baseline position and cumulative proposed position and the reduction factor with balconies notionally removed:

Resultant VSC (residential) with balconies notionally removed						
	Total no. of windows	>27% (satisfying BRE guidelines)	26.99% - 20.00%	19.99% - 10.00%	9.99% - 0 %	Total that don't satisfy BRE
Existing cumulative baseline	162 (76 non habitable)	37 (11 non habitable)	52 (19 non habitable)	72 (46 non habitable)	1	125 (65 non habitable)
Cumulative Result	162 (76 non habitable)	14 (5 non habitable)	44 (9 non habitable)	92 (52 non habitable)	12 (10 non habitable)	148 (71 non habitable)
Reduction in VSC (residential) with balconies notionally removed						
	Total no. of windows	0-20% reduction (satisfying BRE)	20.01 – 30% reduction Low	30.01 – 40% reduction Medium	>40.01% reduction High	Total that don't satisfy

			guidelines)	magnitude	magnitude	magnitude	BRE
Cumulative Result	162 (inc 76 non habitable)		98 (40 non habitable)	14 (8 non habitable)	36 (18 non habitable)	14 (10 non habitable)	64 (36 non habitable)

597. NSL for the cumulative baseline position and cumulative proposed position and the reduction factor with balconies notionally removed:

Resultant NSL (residential)							
	Total no. of rooms		>80% (satisfying BRE guidelines)	79.99 – 60%	59.99 – 40%	Less than 39.99%	Total that don't satisfy BRE
Existing cumulative baseline	78 (38 non habitable)		52 (28 non habitable)	18 (7 non habitable)	7 (2 non habitable)	1 (1 non habitable)	26 (10 non habitable)
Cumulative Result	78 (38 non habitable)		46 (24 non habitable)	20 (8 non habitable)	11 (5 non habitable)	1 (1 non habitable)	48 (14 non habitable)
Reduction in NSL (residential)							
	Total no. of rooms		0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction	30.1 – 40% reduction	>40.1% reduction	Total with reduction greater than 20%
Cumulative Result	78 (38 non habitable)		74 (36 non habitable)	4 (2 non habitable)	0	0	4 (2 non habitable)

598. With the balconies notionally removed, of the 86 windows serving habitable rooms, 26 would satisfy the BRE VSC guidelines prior to the proposed cumulative development compared with 20 when balconies are included. Only 1 would already have a very low VSC (under 10%), compared with 44 when the balconies are included. Following the proposed development, nine (compared with 4) would satisfy the VSC guidance and only 2 would have a VSC of less than 10% (compared with 50 with balconies). It is therefore clear that, on the whole, the very low VSC results in this property result from the existing obstructions, not the proposed development. When the losses are considered as a ratio of the existing condition, 58 (as opposed to 30) of the windows serving habitable rooms would retain at least 0.80 times their former value in line with the BRE guidelines. 6 (compared with 21) would experience losses of a low magnitude, 18 (compared with 15) would experience losses of a medium magnitude and only 4 (compared with 20) would experience losses of high a magnitude. Based on these results, it is fair to say that the presence of the existing balconies at Lewes House does have a material impact on the daylight assessment, and that if they were not present, the magnitude of the results following the proposed cumulative development would be reduced.

599. The differences when considering DD/NSL however are much smaller. With the balconies notionally removed, of the 40 habitable rooms tested, 24 (compared with 22) would satisfy the BRE guidance with an NSL of at least 80%. Following the proposed cumulative development, 22 (compared with 20) of the habitable rooms would retain an NSL of 80% or more. The others would experience losses of sunlight, but for 38 of the 40 habitable rooms,

this loss would be less than 20 and therefore in line with the BRE guidelines. The remaining two would retain at least 0.70 times their former value. These relative losses show no material differences when compared with the results of the building with balconies included.

600. The 49 (20 serving non habitable rooms) windows within 90 degrees of due south were also tested for PSH with balconies notionally removed.

601. APSH for the cumulative baseline position and cumulative proposed position and the reduction factor with balconies notionally removed:

	No. of windows	Total APSH				Reduction in APSH			
		>25% (satisfy BRE)	20-24%	10-19 %	> 9%	0.-20% reduction (Satisfy BRE)	20.1-30% reduction (low magnitude)	30.1-40% reduction (medium magnitude)	>40.1% reduction (high magnitude)
Ex.	49 (20 non hab)	36 (15 non hab)	4	6 (3 non hab)	3 (2 non hab)				
Pr.	49 (20 non hab)	32 (14 non hab)	7 (1 non hab)	6 (2 non hab)	4 (3 non hab)	49 (20 non hab)	0	0	0

602. WPSH for the cumulative baseline position and cumulative proposed position and the reduction factor with balconies notionally removed:

	No. of windows	Total WPSH				Reduction in WPSH			
		>5% (satisfy BRE)	4-4.9%	3-3.9%	> 2.99 %	0.-20% reduction (satisfy BRE)	20.1-30% reduction (low magnitude)	30.1-40% reduction (medium magnitude)	>40.1% reduction (high magnitude)
Ex	49 (20 non hab)	21 (9 non hab)	2 (1 non hab)	2	24 (10 non hab)				
Pr.	49 (20 non hab)	21 (5 non hab)	2 (1 non hab)	2	24 (10 non hab)	49 (20 non hab)			

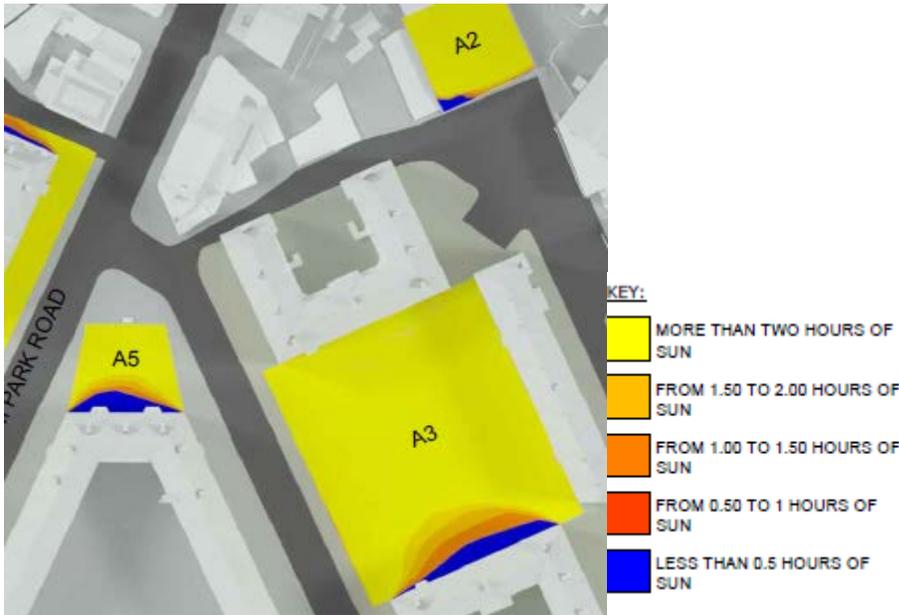
603. With the balconies notionally removed, prior to the proposed cumulative development, 11 (compared with 10) of the 29 windows serving habitable rooms would receive at least 25% APSH, which satisfies the BRE guidelines. Only 1 (compared with 11) would receive a very low APSH of less than 10%. Following the proposed cumulative development, 18 (compared with nine) windows would satisfy the guidelines for APSH, while only one (compared with 15) would receive a very low APSH of less than 10%. When the losses are considered as a ratio of the existing cumulative condition, all 29 windows serving habitable rooms would retain at least 0.8 times their former value, in line with the BRE guidelines. As with the VSC results, this suggests that the presence of the existing balconies at Lewes House does have a material impact on sunlight assessment, and that if they were not present, the magnitude of the results following the proposed cumulative development would be reduced.

604. The amenity space at Lewes House has been assessed for overshadowing, using the Sun

On Ground test. In both the existing and proposed conditions 87% of this space would satisfy the BRE guidelines receiving at least 2 hours of sunlight on 21st March each year.

605. The overshadowing impact on these amenity spaces would be of **negligible magnitude**, resulting in an impact of **negligible significance**.

Image: Sun on Ground results at Lewes House (A3) (proposed)



Northfield House

606. VSC for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant VSC (residential)						
	Total no. of windows	>27% (satisfying BRE guidelines)	26.99% - 20.00%	19.99% - 10.00%	9.99% - 0 %	Total that don't satisfy BRE
Existing cumulative baseline	137 (62 non habitable)	67 (12 non habitable)	9 (4 non habitable)	17 (7 non habitable)	44 (39 non habitable)	70 (50 non habitable)
Cumulative Result	137 (62 non habitable)	5	24 (5 non habitable)	47 (11 non habitable)	61 (46 non habitable)	132 (61 non habitable)
Reduction in VSC (residential)						
	Total no. of windows	0-20% reduction (satisfying BRE)	20.01 – 30% reduction Low	30.01 – 40% reduction Medium	>40.01% reduction High	Total that don't satisfy

			guidelines)	magnitud e	magnitude	magnitude	BRE
Cumulative Result	137 (62 non habitable)		5	1	4	127 (62 non habitable)	111 (62 non habitable)

607. NSL for the cumulative baseline position and cumulative proposed position and the reduction factor:

Resultant NSL (residential)							
	Total no. of rooms		>80% (satisfying BRE guidelines)	79.99 – 60%	59.99 – 40%	Less than 39.99%	Total that don't satisfy BRE
Existing cumulative baseline	86 (24 non habitable)		68 (16 non habitable)	13 (6 non habitable)	4 (1 non habitable)	1 (1 non habitable)	19 (8 non habitable)
Cumulative Result	86 (24 non habitable)		32 (4 non habitable)	29 (4 non habitable)	14 (8 non habitable)	11 (8 non habitable)	50 (non habitable)
Reduction in NSL (residential)							
	Total no. of rooms		0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction	30.1 – 40% reduction	>40.1% reduction	Total with reduction greater than 20%
Cumulative Result	86 (24 non habitable)		47 (5 non habitable)	17 (4 non habitable)	6	16 (15 non habitable)	36 (13 non habitable)

608. A total of 137 windows serving residential rooms were assessed for daylight impacts in this property. 62 of these have been identified as non habitable. Of the 75 windows serving habitable rooms, 55 would satisfy the BRE VSC guidelines prior to the proposed cumulative development. Following the proposed cumulative development, only five would satisfy the VSC guidance. 65 habitable room windows would suffer a loss of high magnitude.
609. For NSL, a total of 83 residential rooms were tested. 24 of these have been identified as non habitable. Prior to the proposed development, of the 59 habitable rooms tested, 48 would meet or exceed the BRE guidance of an NSL of at least 80%. Following the proposed development, 29 of the habitable rooms would retain an NSL of 80% or more. In terms of the losses that the habitable rooms would experience, 41 would retain at least 0.80 times their former value, in line with the BRE guidance. Only 1 habitable room would experience a loss of high magnitude.
610. The daylight impact on this property would be of a **high magnitude**, and given its sensitivity, this would result in an impact of **major significance**.
611. 5 windows serving habitable rooms would be within 90 degrees of due south, and were therefore tested for PSH.

612. In both the existing and proposed cumulative condition, all five would receive excellent levels of sunlight; all retaining 49% APSH or higher (significantly in excess of the 25% recommended by the BRE). Furthermore, all would retain at least 0.95 times their former value of APSH.
613. When considering WPSH, none of the five windows tested would experience any loss as a result of the proposed cumulative development, when considered against the existing cumulative condition. All five would continue to receive excellent winter sunlight, well in excess of the 5% recommended by the BRE.
614. The sunlight impact on this property would be of a **low magnitude**, and given its sensitivity, this would result in an impact of **negligible significance**.
615. There are existing balconies over windows at Northfield House. As set out above, the BRE guidance advises that because balconies cuts out light from the top part of the sky, even a modest obstruction may result in a large relative effect on the daylight and sunlight received. The BRE guidelines therefore go on to advise that one way to demonstrate the impacts of existing balconies and overhangs is to carry out additional calculations, for both the existing and proposed situations, without the balconies in place. This analysis has been undertaken at Northfield House, and the results are summarised below.
616. VSC for the cumulative baseline position and cumulative proposed position and the reduction factor with balconies notionally removed:

Resultant VSC (residential) with balconies notionally removed						
	Total no. of windows	>27% (satisfying BRE guidelines)	26.99% - 20.00%	19.99% - 10.00%	9.99% - 0 %	Total that don't satisfy BRE
Existing cumulative baseline	137 (62 non habitable)	96 (30 non habitable)	29 (20 non habitable)	12 (12 non habitable)	0	41 (32 non habitable)
Cumulative Result	137 (62 non habitable)	5	24 (5 non habitable)	96 (45 non habitable)	12 (12 non habitable)	132 (62 non habitable)
Reduction in VSC (residential) with balconies notionally removed						
	Total no. of windows	0-20% reduction (satisfying BRE guidelines)	20.01 – 30% reduction Low magnitude	30.01 – 40% reduction Medium magnitude	>40.01% reduction High magnitude	Total that don't satisfy BRE
Cumulative Result	137 (62 non habitable)	5	1	9 (5 non habitable)	122 (57 non habitable)	132 (62 non habitable)

617. NSL for the cumulative baseline position and cumulative proposed position and the reduction factor with balconies notionally removed:

Resultant NSL (residential)							
	Total no. of rooms		>80% (satisfying BRE guidelines)	79.99 – 60%	59.99 – 40%	Less than 39.99%	Total that don't satisfy BRE
Existing cumulative baseline	86 (24 non habitable)		75 (20 non habitable)	10 (3 non habitable)	1	1 (1 non habitable)	19 (8 non habitable)
Cumulative Result	86 (24 non habitable)		37 (8 non habitable)	31 (5 non habitable)	14 (7 non habitable)	4 (4 non habitable)	50 (non habitable)
Reduction in NSL (residential)							
	Total no. of rooms		0-20% reduction (satisfying BRE guidelines)	20.1 – 30% reduction	30.1 – 40% reduction	>40.1% reduction	Total with reduction greater than 20%
Cumulative Result	86 (24 non habitable)		60 (11 non habitable)	14 (4 non habitable)	4 (1 non habitable)	8 (8 non habitable)	36 (13 non habitable)

618. With the balconies notionally removed, of the 75 windows serving habitable rooms, 66 (compared with 55 when the balconies are considered) would satisfy the BRE VSC guidelines prior to the proposed cumulative development. Following the proposed cumulative development, only five would satisfy the VSC guidance, which is the same as the result with the balconies included. 60 (compared with 65) habitable room windows would suffer a loss of high magnitude. When the balconies are notionally removed, none of the windows would have a very low resultant VSC of less than 10%, compared with five when the results do include the balconies.

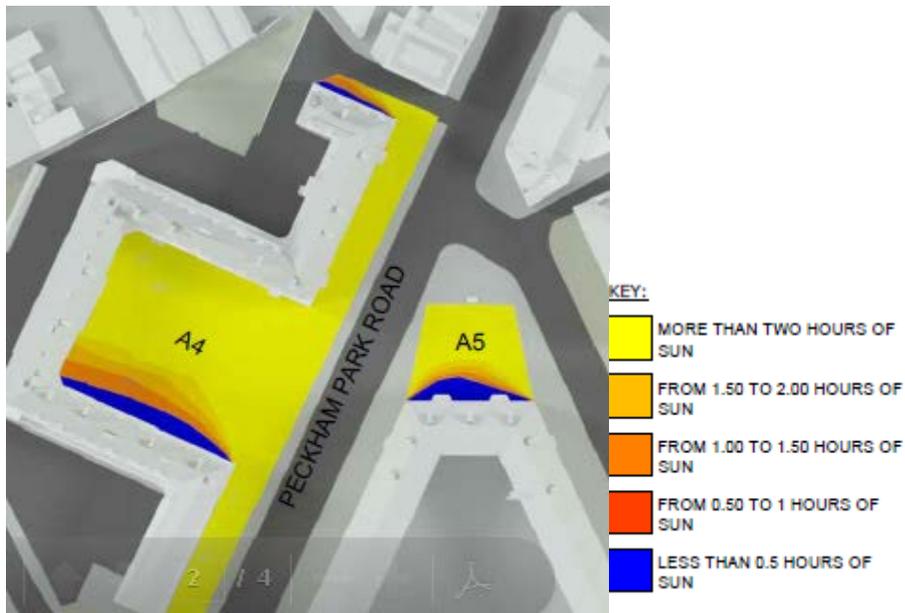
619. With the balconies notionally removed, of the 59 habitable rooms tested, 55 (compared with 48) would satisfy the BRE guidance of an NSL of at least 80%. Following the proposed cumulative development, 29 of the habitable rooms would retain an NSL of 80% or more. This is the same as the result with balconies included. In terms of the losses that the habitable rooms would experience, 49 (compared with 41) would retain at least 0.80 times their former value, in line with the BRE guidance. No habitable rooms would experience a loss of high magnitude.

620. Both the VSC and DD/NSL results suggest that the presence of the balconies does have some influence on the daylight assessment, but it makes a relatively small difference and is not considered to change the magnitude or significance of the impacts reported above.

621. The 5 windows within 90 degrees of due south and were also tested for PSH with balconies notionally removed. The results are exactly the same as those with the balconies in place.

622. The amenity space at Northfield House has been assessed for overshadowing, using the Sun On Ground test. In both the existing and proposed conditions 81% of this space would satisfy the BRE guidelines receiving at least 2 hours of sunlight on 21st March each year.

Image: Sun on Ground results at Northfield House (A4) (proposed)



Canal Grove Cottages

623. The main windows in these properties face perpendicularly past the application site and so do not looking at the proposed development. As such, they cannot be harmed in daylight and sunlight terms. There is one first floor window in 1 Canal Grove above the ground floor doorway. The applicant advises that this is likely to serve a non-habitable space such as a landing.
624. The potential overshadowing of the gardens serving 1, 2 and 10-13 Canal Grove has been assessed using the Transient Overshadowing test. The overshadowing resulting from the proposed development would pass quickly across these gardens, typically adding no more than two hours additional shadow throughout the year. This additional shadowing would occur around 5pm on March 21st each year (although long shadows from surrounding properties not related to the proposal also reach these gardens at this time) and around 2pm on June 21st. There would be no change to the level of shadow around December 21st each year.
625. In response to requests from Officers, additional Sun on Ground analysis has also been provided. This demonstrates that all the gardens at 1, 2 and 10-13 Canal Grove would meet the BRE Guidelines with the proposed development in place, as they would retain at least 2 hours of sunlight to at least 50% of their areas on March 21st each year.

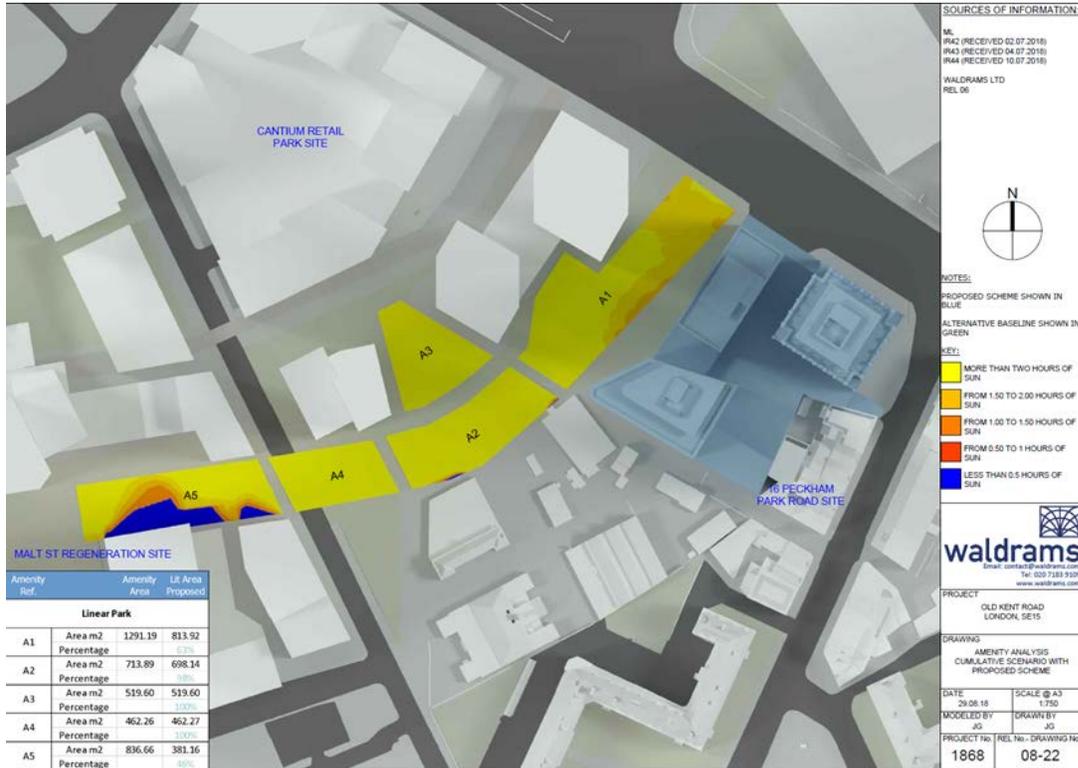
Daylight (ADF or VSC façade analysis) and Overshadowing for Consented Schemes in the Cumulative Position

Cantium Retail Park

626. VSC façade analysis has been undertaken. The results demonstrate that the majority of the facades have a good propensity for daylight. There are however some locations where VSC levels would fall to 10-15%, and some isolated areas of very low VSCs of 5-10% would be experienced. The latter specifically relates to where the blocks face each other and on

internal corners.

627. The parts of the proposed linear park that form part of the Cantium Retail Park proposals (A1, A2, A3) scheme would continue to satisfy the BRE requirements for sunlight amenity (overshadowing), with 63% and 100% of their areas retaining at least 2 hours of sunlight on March 21st each year.



Malt Street

628. Of the parts of the proposed linear park that form part of the Malt Street proposals one (A4) would continue to satisfy the BRE requirements for sunlight amenity (overshadowing), with 100% of its area retaining at least 2 hours of sunlight on March 21st each year. The other (A5) would fall slightly short of the BRE guidelines with only 46% of its area retaining at least 2 hours of sunlight on March 21st each year.
629. Transient overshadowing assessments demonstrate that the proposals would result in additional shadows in the following locations on March 21st each year:

Table: Transient overshadowing of other consented schemes

Receptor	March 21 st	June 21 st	December 21 st *
Cantium Retail Park	Additional shadows between approximately 7.00am and 12.00pm.	Additional shadows between approximately 8.00am and 12.00pm.	Additional shadows between approximately 8.00am and 12.00pm.
Ruby Triangle	Additional shadows at approximately 5.00pm.	Additional shadows at approximately 5.00pm.	No material additional shadows.

Malt Street/Nyes Wharf	Additional shadows between approximately 7.00am and 9.00am. These are largely due to these consented schemes	Additional shadows between approximately 6.00am and 11.00am. These are largely due to these consented schemes	Additional shadows between approximately 6.00am and 11.00am. These are largely due to these consented schemes
6-12 Verney Road	Additional shadows between approximately 9.00am and 12.00pm. These are not caused by the proposed development.	No material additional shadows.	Additional shadows at approximately 5.00pm.

* The sun only reaches a height of around 15 degrees above the horizon on December 21st and therefore relatively low obstructions can cause long shadows, and most of the surrounding area is already covered with long shadows. Furthermore, the sun is often overcast by cloud, blocking sunlight. As a result, December 21st is not considered to be an important date for determining sunlight amenity.

Image: Transient overshadowing at 8am on 21st March. Clockwise from top left: Existing, Proposed, Alternative Baseline, Cumulative.

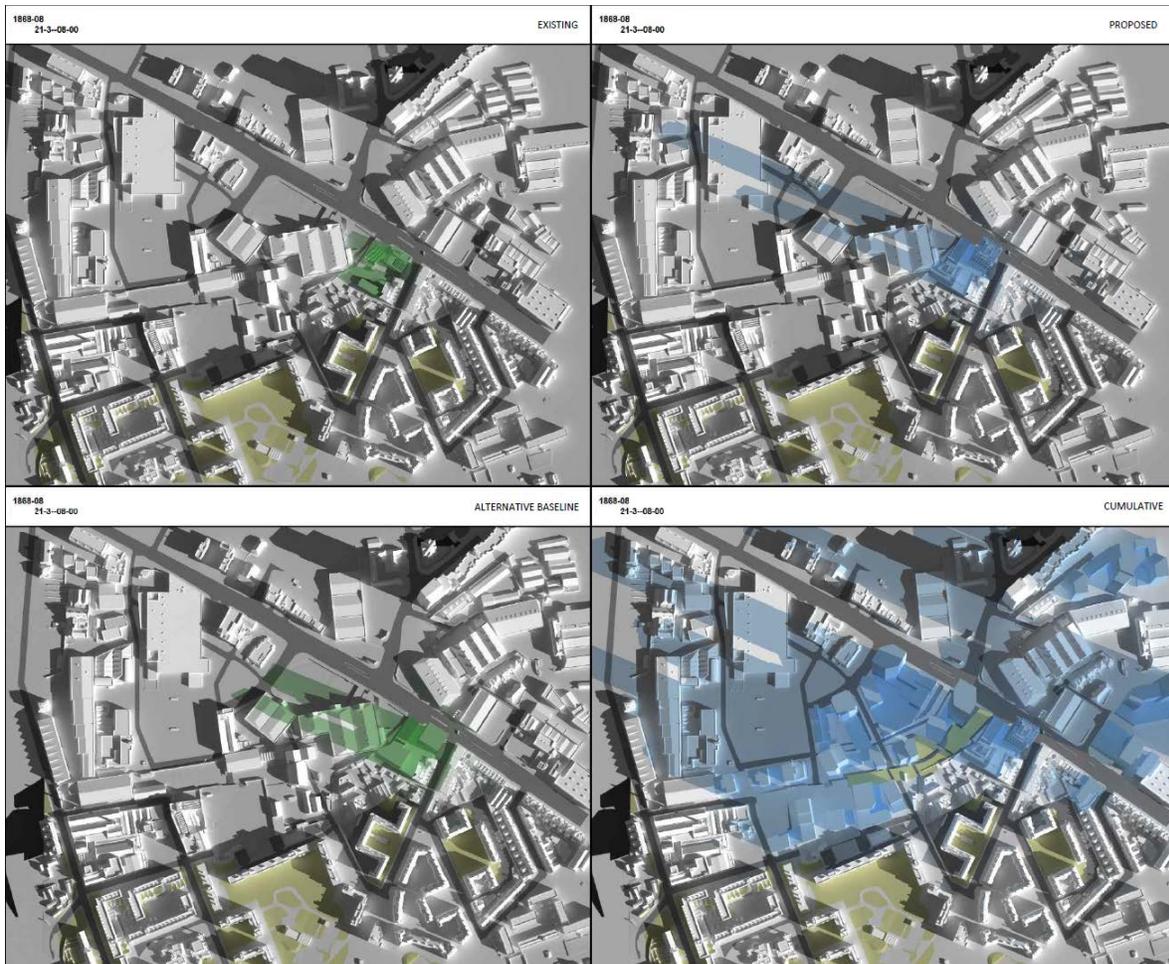


Image: Transient overshadowing at 11am on 21st March. Clockwise from top left: Existing, Proposed, Alternative Baseline, Cumulative.

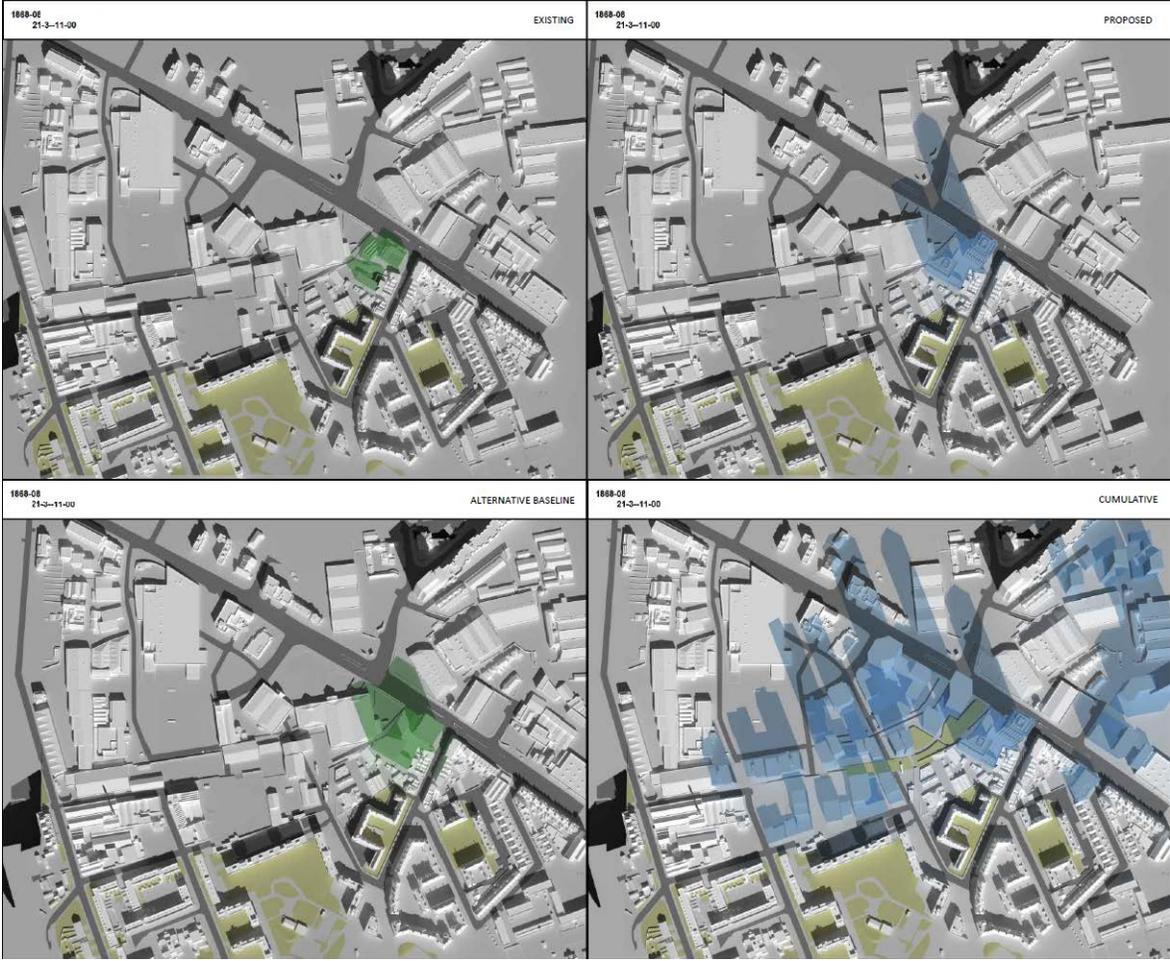
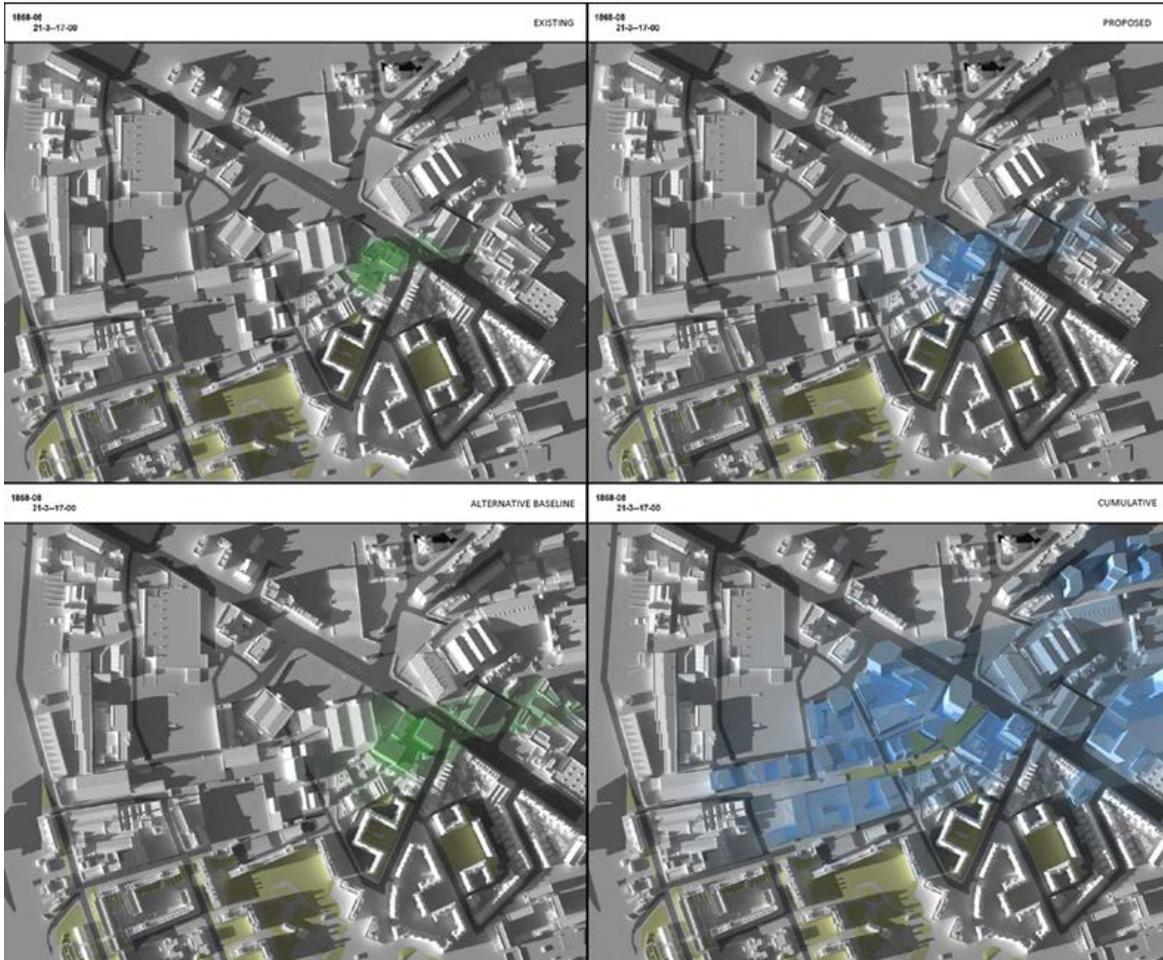


Image: Transient overshadowing at 2pm on 21st March. Clockwise from top left: Existing, Proposed, Alternative Baseline, Cumulative.



Conclusion on Daylight, Sunlight and Overshadowing

- 630. The draft AAP (2017) sets out an expectation of high rise development on the application site. When the daylight and sunlight impact on existing neighbours is compared to a notional 16 storey massing (the ‘alternative baseline’) on the site, the differences are small or negligible. This demonstrates that the impacts on daylight and sunlight arising from the proposal are commensurate with that envisaged by the draft AAP. It is however important to note that the AAP is not an adopted planning document, and can only be afforded very limited weight.
- 631. The alternative baseline scenario also demonstrates that only very significantly lower massing, which would fail to deliver the new homes, jobs and other regeneration benefits proposed here, would have a materially lower daylight impact
- 632. As noted above, the GLA hearing report DandP/3067/03-Appendix 1 states that:

“VSC values in excess of 20% should be considered as reasonably good, and that VSC in the mid-teens should be acceptable... where the VSC value falls below 10% (so as to be in

single figures), the availability of direct light from the sky will be poor.”

633. In many cases, where the results would not satisfy the BRE Guidelines, the retained levels would be within the range considered acceptable by the GLA for an urban location. As a result, and on balance, Officers are satisfied that whilst there would be reductions in daylight and sunlight to neighbouring properties, which in a number of cases would be of a major adverse impact, this would be outweighed by the wider regeneration benefits of the proposals.

Solar Glare

634. Solar Glare is the discomfort, or impairment of vision, caused by sun light reflecting off buildings, creating excessive or large contrasts in luminance within the an observer's Field of View. This can affect road users and the occupants of adjoining buildings. It is particularly important to consider the impacts of solar glare on pedestrian crossings and vehicular junctions.

635. The two categories of glare are defined as follows:

- Distracting Glare: Excessive brightness of surfaces or luminaires within the field of view. Causes discomfort, but does not directly impair vision.
- Disability Glare: The presence of a high luminance source within a low luminance scene which impairs vision.

636. Image-based glare metrics, based on Daylight Glare Probability (DGP) have been used to predict the potential impact of any glare resulting from the proposed development. The simulations assume a completely clear sky, with no cloud cover. Though this does not necessarily represent the typical weather condition, it does demonstrate the worst case condition.

637. The following five viewpoints, which would be particularly sensitive to solar glare, have been selected for assessment:

- Viewpoint 1: Travelling North West on Old Kent Road 23m before the stopping line at the traffic lights at the Junction with Peckham Park Road
- Viewpoint 2: Looking North West on Sandgate Street at the stop line on the junction with Old Kent Road
- Viewpoint 3: Travelling North East on Peckham Park Road 23m before the stopping line at the traffic lights at the Junction with Old Kent Road
- Viewpoint 4: Travelling North West on Old Kent Road 23m before the stopping line at the crossing with traffic lights adjacent 658 Old Kent Road
- Viewpoint 5: On Green Hundred Road at the junction with Peckham Park Road

638. In general, the glazed components of the proposed façades would be broken by substantial areas of non-reflective material, predominantly brick. Given the low reflectance of brick, any glare is likely to flicker across the surface of the proposed building as drivers pass along the road, with the light briefly reflecting off windows. The likelihood of Disabling Glare, defined as significant glare occurring for at least three seconds, is therefore unlikely.

639. Any glare that is likely to occur would be mitigated through the specification of glass with an appropriate reflectivity. With this in place, the submitted analysis demonstrates that levels of

glare would be reduced to a tolerable level at all times. As the glass will not be specified until the detailed design stage, it is recommended that details are secured by planning condition.

Light Pollution / Light Spill

- 640. Light Spill is a general term which encompasses Sky Glow, Light Trespass, Glare and Building Luminance as referred to in the Institute of Lighting Professionals (ILP) guidelines. An assessment has been carried out in line with the industry standards set out in the Institute for Lighting Practitioners’ (ILP) Guidance Note GN01:2011 and the Building Research Establishment’s (BRE) Obtrusive Light from Proposed Developments DG:529.
- 641. Different types of Environmental Zones are described within ILP guidance note GN01. The application site is identified as being in Zone E4: ‘Urban’. In Zone E4, the lighting environment is described as being of “high district brightness”, and the example given is of a “town/city centres with high levels of night-time activity”.
- 642. The ILP notes suggest light intrusion into windows in this context should not exceed 25 Ev (Vertical Illumination in lux) before the ‘curfew’ begins and 5 Ev after the curfew. The curfew is the time after which stricter requirements for the control of obtrusive light will apply; often a condition of use of lighting applied by the planning authority. 23.00 hrs is recommended as the curfew here.
- 643. Without any mitigation measures in place, lux levels all windows in 616 Old Kent Road, 324 Old Kent Road, 1-9 (Odd) Peckham Park Road, 11-21 (Odd) Peckham park Road, 18- 244 (Even) Peckham park Road, Cardiff House, Lewes House and Northfield House would be below 25 lux prior to curfew and below 5 lux post curfew. At 610 old Kent Road, approximately 7 windows would receive lux levels of 25 or over pre curfew. Post-curfew all windows at 610 Old Kent Road would be below 5 lux. At 6-14 (Even) Peckham Park Road, there would be 2 windows that would receive lux levels of 25 or over pre curfew. Post-curfew all windows would be below 5 lux. With the recommended mitigation measures in place, all windows at 610 Old Kent Road would receive pre curfew lux levels of 17.5-22.5 and all windows at 6-14 Peckham Park Road would receive lux levels of 20-25. The table below summarises all post mitigation light pollution results:
- 644. Mitigation is proposed to ensure that ILP compliant levels are achieved in all instances. To secure this mitigation, it is recommended that a lighting plan should be secured by way of a planning condition.

Table: Post mitigation light pollution assessment results

Address	Pre curfew lux level	Post curfew lux level
610 Old Kent Road	17.5-22.5	<5
616 Old Kent Road	10	<5
624 Old Kent Road	5-10	<5
1-9 (Odd) Peckham Park Road	12.5-17.5	<5
11 – 21 (odd) Peckham Park Road	5	<5
6-14 (Even) Peckham Park Road	20-25	<5
18-24 (Even) Peckham Park Road	5-10	<5
Cardiff House	5	<5
Lewes House	5	<5
Northfield House	5-7.5	<5

Overlooking of Neighbouring Properties

645. The nearest residential properties are located immediately adjacent to the proposed development on Peckham Park Road. The residential buildings proposed have been deliberately pulled away from this terrace so as not to result in any harmful overlooking, and there would be no windows in the podium where it would abut these properties. At third and fourth floor there would be balconies in the Livesey Building that could potentially overlook no. 16 Peckham Park Road. However, they would be too high to look into any existing windows and no. 16 Peckham Park Road has no garden. The condition requiring detailed design of the landscape areas will require details of privacy screening where this is necessary. As such, there is no concern about harmful overlooking of neighbouring properties.

TRANSPORT CONSIDERATIONS

646. 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.
647. Southwark have recently adopted the Movement Plan, a people, place and experience approach to transport planning. This application has been assessed on how we will contribute to the delivery of the Movement Plan.
648. The Mayors Transport Strategy (MTS) includes three strategic challenges that are of significant importance to assessing this application, namely:
- Good Growth;
 - New homes and jobs; and
 - A good public transport experience
649. A Transport Assessment (TA) has been submitted, complied with TfL guidance.

Key Transport Issues

650. The key transport issues are:
- BLE tunnelling;
 - Impact on Livesey Place in terms of trip generation; and
 - Phasing and construction management.
651. The application site has a Public Transport Accessibility Level (PTAL) of 4 on a scale of 1-6 where 1 is the lowest level and 6 represents the highest.

Existing Site Layout

652. Livesey Place currently operates two way movements and has low trips to access to existing businesses in the area however due to the close proximity of the junction with Old Kent Road and the location of the bus stops vehicles turning both right in and right out can cause queuing back to the junction. Therefore this is a road safety and congestion concern.

Proposed Site Layout

653. The section of the development bounded by the Old Kent Road from the junction of Peckham Park Road to the new linear park offers improvements to the pedestrian environment, where the ground floor of the building is set back to provide a covered colonnade along the site frontage at the same level as the adjacent footway so as to provide additional space for pedestrians to pass. The residential entrance to the building is located at the north western end of the colonnade.
654. The development offers a further pedestrian improvement on the Old Kent Road through the closure of the current vehicular access to the Topps Tiles store.
655. Peckham Park Road forms the south eastern boundary of the site and is single carriageway two-way road that provides a connection between Old Kent Road towards Peckham to the south.
656. Currently on Peckham Park Road there is a level difference but this will be evened out to provide an improved spacious environment . This will benefit those arriving at and departing from the church as well as benefiting occupants of the entire development and wider local community.
657. Before first phase occupation Livesey Place will change operation to left in, left out only and an alternative access will be provided from Frensham Street in a new access road funding which is to be provided by the developer. The existing uses on Livesey Place will be able to maintain their delivery and servicing arrangements within the new arrangements. This will be delivered through the S278 agreement and all changes will be in line with Southwark's Streets Design Manual (SSDM).
658. The new access only road from Frensham Street to Livesey Place will improve road safety in the area. There will be sufficient space at the access to the developments new car park to prevent queuing on the highway and pedestrian movement will be prioritised through the design. This will be delivered through the S278 agreement.
659. Pedestrian access to the church in the building on the Civic Centre part of the site will be from Peckham Park Road by way of a new area of public realm at the corner of Old Kent Road and Peckham Park Road.
660. At present, Livesey Place terminates at the entrance to the yard that forms part of the Livesey Place element of the site. The development proposals will deliver the AAP objective to provide a link from the shops on Peckham Park Road through to the on to the Cantium development site. This link will take the form of Livesey Mews, which will continue on from Livesey Place to the park. It is proposed the Livesey Mews will be a pedestrian public realm area with street trees/planting providing a transition between the existing granite cobbles of Livesey Place into the green of the park.
661. The employment element of the Livesey Place Building will be accessed from the park or through the entrance to the cafe located at the corner of Livesey Mews and the park. Access to the Livesey Place Building residential units will be taken from Livesey Mews.
662. Vehicular access to the site will be taken from Livesey Place. A shared service area will be

provided at ground floor, with a basement parking area provided, which will be accessible by way of a car lift.

663. The provision of a service access from Livesey Place to service the whole site accords with the AAP and enables the vehicular access to the Topps Tiles part of the site to be removed from the Old Kent Road.

Trip Generation

664. Once fully built and occupied, the vehicular trip generation from the site is estimated to be as follows. The residential element of the site will receive the following number of trips:

- The Topps Tiles part of the site would generate 6 deliveries per day of which 5 would be by LGV and 1 by HGV;
- The Civic Centre part of the site would generate 22 deliveries per day of which 19 would be by LGV and 3 would be by HGV; and
- The Livesey Place part of the site would generate 11 deliveries per day of which 9 would be by LGV and 2 would be by HGV. Overall, it is estimated that there would be a total of 39 residential deliveries per day, of which 33 would be undertaken by LGV and 6 by HGV.

665. The office and light industrial floor space is expected to generate 10 deliveries per day. It is envisaged that of the 10 deliveries, 8 would be undertaken in light goods vehicles and 2 in HGVs. It is anticipated that a café would have up to 2 deliveries per day typically by vehicles up to and including a Luton Box Van. The retail element of the scheme is small in nature and each of the four units are unlikely to generate more than one delivery per day, which are likely to be undertaken in light goods vehicles.

666. The only regular commercial vehicle movement associated with the operation of the Church is refuse, which is currently collected once weekly.

Table: Motorised vehicle servicing numbers

Use	Anticipated Trip Rate (Per 100 sqm)	Total Number of Deliveries	LGV	HGV
B1a and B1c	0.391	10	8	2
Café	-	2	2	-
Retail Units	-	4	4	-
Church	-	1	-	1
Residential		39	33	6
Total	-	56	47	9

667. The person trip attraction of the proposed development has been considered for the typical weekday morning (8am – 9am) and evening (5pm – 6pm) peak hour periods, with the exception of the church, where consideration has been given to a Sunday when the main weekly service takes place.

668. The existing church has capacity for 418 persons and in future the maximum number of

people on site could be 620, although it is unlikely that the church would always operate at capacity.

- 669. However, so as to provide a robust assessment, consideration has been given to the level of trips on a Sunday if 620 people were to attend the site.
- 670. The busiest one hour period is the hour commencing 1:15pm, when 121 people could arrive at and 282 depart from the church. This represents an increase of 40 arrivals and 92 departures from that which could occur at present.
- 671. The total person residential trips for the 372 units is 117 arrivals in the morning peak between 7 and 10 am and 387 departures. In the evening peak there are 314 arrivals and 174 departures.
- 672. A draft Travel Plan for the church has been submitted. A final version would be secured through the Section 106, along with monitoring and reporting requirements.
- 673. The survey data presented in the draft Church Travel Plan indicates that the majority of respondents would be able to travel to the site at present without needing to rely on use of a private car. Alternative modes of travel will become more available and attractive through the delivery of the surrounding draft OKR AAP development sites, improvements to Old Kent Road and the Bakerloo Line Extension.

Walking

- 674. During the development of the proposals it was acknowledged that a Pedestrian Environment Review System (PERS) audit carried out for Malt Street Regeneration project (Ref:17/AP/2773) was viable for this site. Officers considered this sufficient information to assess the pedestrian permeability for this site.
- 675. The Development provides for new arrangements on the Old Kent Road and will provide a wider footway and as the ground floor is recessed there will be an extra comfort level for pedestrians. After Phase one is delivered the crossover for Topps Tiles car park will be returned to footway and leads on to the new linear park. Pedestrians will be able to access from the rear and side of the building from the new park areas. The area of Livesey Place closest to the park will only allow emergency and essential servicing vehicles access therefore allowing for pedestrian priority.

Cycling

- 676. During the development of the proposals it was acknowledged that a Cycling level of service (CLOS) carried out for the TA of the Malt Street Regeneration was viable for this site. This encompassed routes through Burgess Park towards Elephant and Castle, South Bermondsey Station, Queens Road Peckham Station, Peckham High Street and Surrey Canal Station, as well as routes to Quietway 1. The assessment recorded scores ranging from 34 to 70 for the routes. A score of 70 is seen to reflect a good score. There were no critical scores recorded.
- 677. A total of 622 cycle parking spaces would be provided across the scheme .This would be split across the uses as shown in the table below.

678. Short stay cycle parking for visitors will be provided in accordance with current London Plan cycle parking standards in public realm areas around the site. The number of cycle parking spaces to be provided is detailed in the table below.

Table: Long stay cycle parking proposed

Cycle Parking – Long Stay		
Building	Land Use	Provision
Civic Centre part of the site	Residential	335
	Church	3
Topps Tiles part of the site	Residential	64
	Retail	8
Livesey Place part of the site	Residential	182
	B1a	23
	B1c	5
	Café	2
TOTAL		622

Table: Short stay cycle parking proposed

Cycle Parking – Short Stay	
Land Use	Provision
Residential	12
Church	18
Retail	4
B1a	4
B1c	1

Café	3
Total	42

679. Residents' cycle parking will be accessed from the building through the dedicated cycle entrance on Peckham Park Road. There is an accessible bike parking store at ground floor level, accessed via an internal corridor, and some standard bike parking spaces at this level. The remaining standard bike parking spaces are at mezzanine level, and so are accessed via a dedicated bicycle lift to the mezzanine level. This offers a good variety of access
680. Commercial cycle parking will be accessed from the building through the commercial entrance lobby with doors from Livesey Mews or from the linear park. The bike parking store is at second floor level, accessed via the office entrance lobby and office lifts to the second floor.
681. Retail / cafe cycle parking will be accessed from the building through the front doors to each of the units 1-4. There is bike storage at ground floor level within the lobby between the loading bay and the retail unit servicing corridor.
682. Following discussions with the applicant there are now minimal number of doors to access to the cycle storage.
683. The cycle parking complies with the current London Plan Standards. 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. The cycle parking will predominately be provided using a two-tier parking system. A total of 5% of long stay cycle parking spaces will be provided by way of Sheffield stands that will be capable of accommodating larger cycle parking spaces in accordance with London Cycle Design Standards.
684. The cycle stores are provided at ground, basement and mezzanine floor levels. Cycle lifts will be provided to access mezzanine and basement level cycle stores and powered doors will be provided in corridors leading to cycle stores.
685. By the time of first occupation this development there will be an extension to the Santander docked cycle hire in the Old Kent Road therefore we are requesting a contribution of £50 per residential unit which totals £18,600. For information the initial programme will see 3 docking stations each between Bricklayers Arms existing docking stations and Ilderton Road. This is part of programme of extensions to link Burgess Park to Bermondsey station and Canada Water.

Public Transport

Buses

686. 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.
687. The closest bus stops are located on Old Kent Road to the south east, Peckham Park Road

to the south west and Trafalgar Avenue to the north west.

688. As a borough we agree with TfL that 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. The requirement for TfL to provide evidence to prove both previous contributions have been spent appropriately and the evidence for the further draw is the fairest way this could be managed. As per the Ruby Triangle site, the proposal is that there would be a maximum cap for TfL to call on of £2,700 per unit. This would be able to be requested in stages between 3 - 5 years and secured through S106.

Bakerloo Line Extension Running Tunnels

689. The current proposals for the BLE involve running tunnels directly below this site. The impact of the proposed scheme's foundations on these tunnels has been assessed by TfL and LBS.
690. The applicant has met with TfL to discuss this and to the best of our knowledge the application would not impede the delivery of the BLE. Specifically the applicant has explained a draft Conceptual Design Statement (CDS) has been produced which outlines the design considerations and methods that will be adopted in the detailed design stage and be subject to a condition, the objective of which will demonstrate the impact on the tunnels will satisfy TfL required criteria.

Car Parking

691. The site is located in a designated Controlled Parking Zone. The existing site does provide some off street parking, related to the previous uses which will not return.
692. The proposal is car free but does provide 16 off street disabled parking bays in the basement car park which will be accessed from Livesey Place via the proposed new access road from Frensham Street. 15 of the disabled bays will be prioritised for residents, 1 disabled bay will be available to the returning church. There would also be 6 bays, 2 in the basement and 4 at ground floor to provide off street servicing and short stay for resident services like a carer or repairs and maintenance operatives. The car parking area would be managed. If bays for disabled parking are not required these bays can be utilised for other uses like extending cycle parking, e-charging and visitor parking or car club bays. They would not be allocated to individual residential units. The car park would include e charging for 4 spaces and all the remaining bays could be adapted for e charging in the future.
693. The car park would provide space for 4 mobility scooters and the appropriate e-charging arrangements.
694. No new resident would be able to have parking permits, and to ensure new residents are aware of car free living there will also be a Section 106 obligation n to ensure all marketing of the development promotes car free living.
695. Three years car club membership will be offered to new residents.

Construction

- 696. A draft Construction Environmental Management Plan (CEMP) has been submitted. It has been developed to provide the management framework required for the planning and implementation of construction activities on site. Construction on the site is anticipated to last for 42 months, starting in Q1 2021 and finishing in Q2 2024.
- 697. The Section 106 would secure a detailed Construction and Environmental Management Plan CEMP and a £40 per unit contribution for Construction Management within the OKR AAP area. This is for the Council to manage cumulative impacts on the highways and environment.
- 698. The Council's Environmental Protection Team have also reviewed the proposals in relation to Construction Management and have also requested that an obligation is put in place to prevent any development from taking place, including any works of demolition, until a written construction environmental management plan (CEMP) has been submitted to and approved in writing.

Servicing and Delivery

- 699. The Delivery and Service Management Plan predict servicing demands for the Civic / Livesey scheme. The primary objectives of the DSP will be to manage deliveries and servicing to both the residential and commercial elements of the development in order to ensure that servicing activity is undertaken in a safe and efficient manner.
- 700. Vehicular access for all three buildings will be taken from Livesey Place at the southern extent of the development site. The vehicular access will lead to a loading bay that will serve all buildings on site. The shared covered service area will provide four bays for unloading to take place, three for light vans and one capable of accommodating a refuse vehicle or other large vehicle. Access to the loading area will be granted via an intercom system that will connect to the relevant building's concierge or commercial tenant.
- 701. The original planning submission contained a relatively small number of apartments in the Topps building (52, or approx. 14% of total apartments in the application) which had a travel distance from apartment front door to the Civic and Topps refuse storage of more than 30m. This was due to a fire strategy change requiring the relocation of the refuse store doors at a late stage in the design process. This has been reviewed and the refuse store door relocated such that now only 22 of the apartments in the Topps building (or 6% of total apartments) are more than 30m from the refuse store door. The Livesey refuse storage has been relocated internally to maximise the active frontage to Livesey Mews, but the travel distance to the new refuse store is marginally further than before, but is within the 30m requirement for all of the Livesey apartments.
- 702. 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:

- 1) Necessary to make the development acceptable in planning terms;
- 2) Directly related to the development; and
- 3) Fairly and reasonably related in scale and kind to the development.

703. The proposal is for the management of the new development to monitor the daily vehicular activity of the site both commercial and residential, quarterly for a period of 2 years from 75% occupancy. If the site meets or betters its own baseline target the bond will be returned within 6 months of the end of the monitoring period. If the site fails to meet its own baseline the bonded sum will be made available for the council to utilise for sustainable transport projects in the ward of the development. The council will retain £1,600.00 for assessing the quarterly monitoring. The bond in this instance would be £37,786.60 based on the 372 residential units and 2,693 sqm of non residential floor space (excluding the church). The applicant has agreed to the contribution which can be collected via the S106 legal agreement.

Table: DSP Bond calculation

	All phases	£
Residential	372 units	37,200
Non residential	2,693 sqm (excluding church)	538.60
	Total	37,738.60
Baseline	motorised vehicle trips per day	55 (excluding church)

704. The trips related to the returning church will be monitored outside the DSP bond. As with other recently approved applications within the OKR AAP area where there is a place of worship or an event space a separate Travel Plan is required. This is subject to a condition and will monitor against a revised baseline to be established 3 months after occupation and subsequently monitored quarterly for three years.

705. The retained fee for the DSP Bond is sufficient to cover the monitoring for both elements.

Conclusion on Transport

706. It is concluded that the proposals accord with land-use and transport policy objectives by locating residential and commercial development in what will become a highly accessible location.

707. 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	The development provides a range of benefits to encourage active transport for all. Good pedestrian permeability, access to a range of cycling and good public transport.	✓	✓	✓
M2	Mental wellbeing	Public realm space	✓	✓	✓
M3	Physical wellbeing	Development will be marketed as car-lite with information on access to cycling and walking to the linear park will improve access to destinations like Burgess Park and Quietway 1.	✓	✓	✓
M4	Reduce Traffic	This area will continue to change over the next 10 years and by attaching a DSP bond will enable monitoring of trip generation throughout this time.	✓	✓	✓
M5	Social Streets	The development includes retail on the ground floor and has off street servicing. The location is well served by public transport and proximity to the linear park will encourage footfall and cycle access.	✓	✓	✓
M6	High Streets	Although set back from the Old Kent Road with public open space linking to Burgess Park allows for good pedestrian permeability and space to dwell and rest.	✓	✓	✓
M7	Journey Experience	Car lite and the DSP bond help to manage traffic reduction.	✓	✓	✓

M8	Managing Change	The CEMP and DSP bond help change management.	✓	✓	✓
M9	Working Together:	Condition to require marketing material to promote car free living.	✓	✓	✓

708. This development is supported because it provides good quality 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:

- Delivery and service plan bond details of parking, servicing and delivery management to encourage safety and sustainability;
- Detailed design of the basement and servicing layout; and its relationship with the public highway.
- A bus contribution for TfL;
- Contribution to cycle hire scheme (Santander or equivalent);
- Car club membership;
- Detailed design of cycle parking;
- Residents would not be eligible for parking permits in the CPZ, or any future CPZ;
- Marketing details to ensure promotion of car free living; is clear to the new occupants of the development;
- Section 278 works with the council for highway works, tree planting and traffic management changes; and
- Detailed Construction and Environmental Management Plan (CEMP)

709. The Council's Highways Team have also reviewed the proposals and indicated that there are no issues to be resolved prior to consent, and that they would support a positive recommendation, subject to conditions and a requirement for the developer to enter into a Section 278 agreement.

ACHAEOLOGY

710. The Council's Archaeology Officer has reviewed the proposals and made the following recommendations.

711. The site lies within two Archaeological Priority Zones (APZs), the 'Bermondsey Lake APZ' which is designed to protect the shoreline and relict fills of the large Late Glacial Bermondsey Lake and the 'Old Kent Road APZ', which has the potential to contain features associated with the former route of 'Watling Street', the major Roman road between London and Canterbury. Significant archaeological remains predominately of prehistoric and Roman date have been discovered in the area from a number of sites. These works have identified multi-period archaeological deposits including in situ prehistoric flint-work and Roman settlement features, as well as medieval, post-medieval and industrial archaeological deposits.

712. The main concern is the Topps Tiles site. The sites around the Civic Centre have been extensively disturbed by previous development and most significantly the former canal, and we now have sufficient information from the 2018 pre-determination evaluation works to manage the archaeology of the rest of the development site by condition. The Topps Tiles site lies next to the B&Q site which excavation has revealed contained prehistoric flint scatters of national importance, and the Topps Tiles site is also elevated above the old B&Q site (which has been extensively terraced) so it is likely that there could be better survival of archaeology deposits in this location. We will need archaeology to be in the S106 to allow us the flexibility to protect the archaeology here by a sympathetic foundation design, if required.
713. Any works affecting the listed mural will require listed building consent. An assessment of the fabric and structural stability of the mural should be recorded, as well as a Historic Building Record report to Historic England level 1-2 standard which should be carried out prior to any impact on the mural, this is in order to have a robust record of the mural prior to any change.
714. The evaluation report and DBA formally submitted to support this planning application are approved. Further archaeological safeguards will be required on this site, but they can be managed by pre-commencement conditions on any future grant of planning consent and a S106 obligation.
715. 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 recommended pre-commencement conditions and compliance condition are applied to any consent.

AVIATION

716. 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.

TV AND RADIO SIGNALS

717. Arqiva own and operate the UK Terrestrial Television Broadcast network and supply the Freeview platform. They also own and operate 90% of the UK Radio Broadcast network, through which they broadcast the full range of BBC and commercial radio stations. In addition, many sites that they own or manage are shared by other operators, such as BT, the Mobile Network Operators, Airwave (Emergency Services Networks), roadside services and Central and Local Government departments and agencies.
718. Arqiva have objected to the proposed development because it would, along with other development proposed along Old Kent Road, block a radio broadcast link, both permanently and during the constructions phase.
719. In order to mitigate this impact, Arqiva have undertaken a preliminary investigations into how to re-route this link. Subject to further investigations and costing, they propose to maintain the link by re-routing via the main television transmitter at Crystal Palace. Such mitigation would have to be implemented prior to any development reaching a certain height, and may require controls on the placing and operation of cranes during construction.

720. The NPPF requires the Local Planning Authority to consider the possibility of interference to TV and radio signals. OFCOM guidance suggests “proportionate conditions” should be in place to mitigate any disruption. Policy 7.7D in the London Plan says “Tall buildings should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, navigation and telecommunication interference”. This is echoed in policy D8 in the new London Plan.
721. It is therefore considered reasonable to request a proportionate financial contribution from the applicant in this case, to be paid towards the cost of disruption to be based on the number of developments due to come forward within the line of broadcast and the expected cost of mitigating the impact. This contribution can then be replicated across other schemes and it is for Arqiva to satisfy us that their estimate is reasonable. This payment will be secured through the Section 106 in consultation with Arqiva.

ENVIRONMENTAL CONSIDERATIONS

Wind and Microclimate

722. Chapter 7 of the ES assesses the likely impacts of the proposed development on wind and microclimate in terms of pedestrian comfort safety and comfort using a 3D computer model.
723. The Lawson Criteria have been applied to determine the acceptability of wind for pedestrian safety and comfort. The Lawson Safety Criteria identify areas where people could find walking difficult, or even stumble and fall. This establishes wind speeds not to be exceeded for more than 0.025% of the year (approximately 2 hours/year). These safety criteria are set in the table below:

Table: Lawson Safety Criteria

Safety Rating	Threshold mean hourly wind speed exceeded once per annum (0.025%)	Wind conditions as experienced by people	Safety concern
Unsuitable for the general public (S15)	>15 m/s	Less able and cyclists find conditions physically difficult.	Areas accessible to the general public: sitting areas, standing areas, walking areas.
Unsuitable for able-bodies (S20)	>20 m/s	Able-bodied persons find conditions difficult. Physically impossible to remain standing during gusts.	Areas with limited public access, maintenance areas, carparks, motorways.

724. The Lawson Comfort Criteria establish wind speeds that should not be exceeded for more than 5% of the time in a season in order to ensure pedestrian comfort for different activities. These criteria are set out in the table below:

Table: Lawson Comfort Criteria

Comfort Category	5% Exceedance Threshold	Description
Pedestrian Sitting	<4 m/s	Light breezes desired for outdoor restaurants and seating areas where one can read a paper or comfortably sit for long periods.
Pedestrian Standing/ Entrance Doors	<6 m/s	Gentle breezes suitable for main building entrances, pick-up/drop-off points and bus stops.
Pedestrian Walking	<8 m/s	Moderate breezes that would be appropriate for strolling along a city/town centre street, plaza or park.
People Around Buildings/Business Walking	<10 m/s	Relatively high speeds that can be tolerated if one's objective is to walk, run or cycle without lingering.
Roads/ Car Park	>10 m/s	Winds of this magnitude are considered a nuisance for most activities, and wind mitigation is typically recommended.

725. A total of 75 discreet points (“location points”) at the site and in the immediate surrounding area have been used to assess the wind effects in and around the site. This includes points in the area surrounding the site and points on the roof terraces and balconies.

Image: Location points at ground floor



726. When considered cumulatively, the Lawson Safety Criteria would be met for each location point.

727. When considered cumulatively, the vast majority of points tested would experience negligible

to major beneficial effects in relation to the Lawson comfort criteria. There are however, five points where the comfort criteria would not be met, resulting in minor to moderate adverse effects. These are summarised in the table below.

Table: Locations points that would experience adverse wind comfort effects

Point	Location	Impact	Comment
Point 1-8	Retail entrance to Topps Tiles building	In winter, with and without vegetation, comfort criterion would not be met. It would be one category worse than desired criterion. Desired Criterion: Pedestrian Standing/ Entrances and Safety. Achieved criterion: Pedestrian Walking. In summer, desired criterion would be met.	Minor adverse impact. The effect would only appear a limited time of the year. Vegetation within the linear park is likely to improve conditions, which would be likely to achieve desired criteria.
Point 1-9	Residential entrance to Topps Tiles building	In winter, with and without vegetation, comfort criterion would not be met. It would be one category worse than desired criterion. Desired Criterion: Pedestrian Standing/ Entrances and Safety. Achieved criterion: Pedestrian Walking. In summer, desired criterion would be met.	Minor adverse impact. The effect would only appear a limited time of the year. Vegetation within the linear park is likely to improve conditions, which would be likely to achieve desired criteria.
Point 1-13	Retail entrance to Livesey Place	Comfort criterion not met in summer or winter, with and without vegetation. It would be one category worse than desired criterion in summer and two categories worse than desired criterion in winter. Desired criterion: Pedestrian Standing/ Entrances (both summer and winter). Achieved criterion: Pedestrian Walking (summer) and People Around Buildings/ Business Walking (winter).	Minor adverse impact in summer, moderate adverse impact in winter. Vegetation within the linear park is likely to improve conditions, which would be likely to achieve desired criteria.

Point 2-5	Seating area on level 3 roof terrace	Comfort criterion not met in summer or winter, with and without vegetation. It would be one category worse than desired criterion. Desired criterion: Pedestrian Sitting (summer) and Pedestrian Standing (winter). Achieved criterion: Pedestrian Standing/Entrance doors (in summer) and Pedestrian Walking (in winter).	Minor adverse impact. The effect would only occur 4% of the time.
Point 2-6	Recreational (grass) area on level 3 roof terrace	Comfort criterion not met in summer and winter, with and without vegetation. It would be one category worse than desired. Desired criterion: Pedestrian Standing (in summer) pedestrian walking through (in winter). Achieved criterion: Pedestrian walking (in summer) and people around buildings (in winter)	Minor adverse impact. The effect would only occur 4% of the time.

728. The applicant has confirmed that Ruby Triangle was included within the cumulative schemes assessed, but there is a typo in table 7.9 in the ES suggesting that it wasn't.
729. Mitigation studies proposed the installation of a porous screen to the top of the existing site-perimeter wall (to the south-west end of the site) for the interim period, should the proposed development come forward prior to delivery of the forthcoming Linear Park. This would diffuse the wind arising from the south and south-western directions, whilst still allowing access for emergency vehicles. It is recommended that this should be secured by condition.

Flood Risk and Water Resources

730. The site is lies in Flood Zone 3 and is located within an area benefitting from flood defences. Whilst the site is protected by the Thames Tidal flood defences up to a 1 in 1000 (0.1%) chance in any year, flood modelling (December 2017) shows that the site is not at risk if there was to be a breach in the defences. Therefore, the development would be at low risk of flooding.
731. The Environment Agency has reviewed the submitted information in relation to flood risk and has no objection to the proposed development.
732. The council's flood and drainage team have also reviewed the submitted proposals, including the drainage strategy and advised that, as this site falls within the Old Kent Road Regeneration area, the site must achieve greenfield runoff rate, or pay a financial

contribution at £366 per cubic metre that it falls short. They have calculated that the shortfall against greenfield run off rates would be 48.5 cubic meters. Accordingly the financial contribution to be secured through the Section 106 would be £17,751.

Ground Conditions and Contamination

- 733. A Desk Study report was prepared to determine the history of the site to assess the potential for contamination. Taking into account the former industrial uses, the desk study information has determined that there is a moderate risk of contamination of the site that would require remediation.
- 734. The council's Environmental Protection Team have accordingly recommended the attachment of a condition to require a site investigation to be undertaken and a detailed remediation and/or mitigation strategy to be prepared and submitted. This condition has been included on the draft decision notice.
- 735. The Environment Agency have reviewed the proposals in relation to contaminated land and made the following recommendation.
- 736. "We have reviewed the document 'Phase 1 Desk Study Report' by GB Card (reference GB399A-P1DSR-SEPT-2018-Rev2 dated 17/09/2018). The report indicates the potential for historic ground contamination to be present and has advised that a Phase 2 intrusive investigation will be undertaken to assess this. We consider that planning permission should only be granted to the proposed development as submitted if the following planning conditions are imposed as set out below."
- 737. The recommended conditions are included in the draft decision notice.

Air Quality

- 738. The site is located in an Air Quality Management Area and an Air Quality Assessment has been submitted, which considers the air quality impacts arising from the construction and use of the development. Southwark Plan Policy 3.6, Air Quality, states that planning permission will not be granted for development that would "lead to a reduction in air quality." London Plan (2016) Policy 7.14 states that development proposals should minimise increased exposure to existing poor air quality and make provision to address local problems of air quality.
- 739. The Air Quality Assessment found that construction activities would pose a high risk of dust impacts and a medium risk of increases in particulate matter concentrations. It also identified that through good site practice and the implementation of suitable mitigation measures, the effect of dust and PM10 releases would be significantly reduced. These will be secured through the CEMP required by the Section 106 Agreement. The assessment concluded that the residual effects of dust and PM10 generated by construction activities on air quality would not be significant. The residual effects of emissions to air from construction vehicles and plant on local air quality were also not considered to be significant.
- 740. The submitted Assessment also considers the impacts that the proposed development would have once construction is complete. The pollutants considered are NO₂, PM10 and PM_{2.5}. The assessment shows that impacts on air quality for existing and proposed receptors would be negligible and the residual effects would not be significant.

741. The Council's Environmental Protection Team have reviewed the proposal in relation to air quality and accepted the conclusions of the submitted Air Quality Assessment. Initially they raised concerns that mitigation would be required for nitrogen dioxide emissions to reach carbon neutral. However, the subsequent removal of the CHP plant and replacement with Air Source Heat Pumps means that the development is now air quality neutral and no off-setting/NO2 mitigation would be required.

Noise and Vibration

742. Chapter 8 of the ES assesses the likely impacts of the proposed development on Noise and Vibration. Noise measurements were obtained in an on-site survey in February-March 2017. These noise levels were used as inputs into a 3D acoustic computer model to model the existing (baseline) noise environment at the site. The proposed development was then included in the model, and the expected noise levels in the future scenario were predicted.

743. The assessment of demolition and construction noise and vibration has been based on the plant and machinery assumed to be required to build out each element of the proposed development and has been undertaken with reference to Southwark Council's Technical Guidance for Noise.

744. The council's Environmental Protection Team have reviewed the submitted proposal in relation to noise and vibration and made the following four recommendations:

745. The recommendations contained in the submitted 'Operational Noise Impact Assessment', issue 4, by Max Fordham LLP, September 2018, shall be fully implemented in the development works and maintained in all future uses of the structures. This shall include the installation of a finish providing acoustic absorption on the underside of private balconies.

746. The use of the church for religious services shall not be outside the hours of 08:00 to 21:00 hours on Mondays to Fridays and 09:00 to 19:00 hours on Saturdays and Sundays.

747. The use of the internal communal amenity space under the residential flats shall not be permitted outside of the hours of 08:00 to 22:00 on Mondays to Saturdays and 09:00 to 21:00 hours on Sundays. The party walls and ceilings between this space and residential dwellings shall be designed to achieve a minimum weighted standardized level difference of 60dB DnTw+Ctr. The partition's acoustic performance shall be permanently maintained thereafter.

748. Any spaces that will have an A4 or B1c use in the completed development shall be subject to a noise assessment relating specifically to the details of that proposed use in order to inform the design and construction of sound insulation such that any habitable rooms within the development sharing a party ceiling/floor element with those commercial premises are provided with reasonable resistance to the transmission of sound sufficient to ensure that noise due to the commercial premises does not exceed NR25. A written report shall be submitted to and approved by the LPA. The development shall be carried out in accordance with the approval given. The approved scheme shall be implemented prior to the commencement of the use hereby permitted and shall be permanently maintained thereafter. Any future change to a potentially noisier use shall have a new noise assessment carried out to inform any changes to the design of sound insulation that shall be implemented to meet the above criteria (NR25) before commencement of that changed use.

749. All of these recommendations are made in order to ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities within the commercial premises accordance with strategic policy 13 'High environmental standards' of the Core Strategy (2011), saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007) and the NPPF 2019.

750. The recommended conditions are included in the draft decision notice.

Odour

751. The Council's Environmental Protection Team have reviewed the proposal in relation to odour and made the following observation. The Ventilation and Extraction Statement by Max Fordham LLP, September 2018, correctly indicates that commercial kitchens will require odour treatment and that space for this is provided. Normally EPT would require high level discharge of the kitchen flues, but it is understood that this may not be possible for the tallest building(s). Consequently very high standards of abatement of particulates and odours will be needed for the A3 units, with regular servicing and maintenance. Even then there is a possibility that adverse odour impacts may still be experienced by residents in the flats close to the extract outlets. A pre occupation condition requiring details of abatement of particulates and odours will be needed for the A3 units has been included in the draft recommendation.

Socio-Economics Effects, Population and Human Health

752. An assessment has been made of the social and economic effects of the proposed scheme. This has considered the extent to which the scheme impacts on employment, population, the local community and social and community infrastructure.

753. The potential significant effects of the proposed development in socio-economic terms are:

- Creation of new jobs during the construction and operational phases of development;
- Provision of new housing;
- Displacement and re-provision of place of worship and employment floorspace;
- Increased demand for education and healthcare facilities;
- Provision of open space and playspace; and
- Improvements in site safety.

754. Mitigation and enhancement measures identified include:

- Commitment to advertise job vacancies in local job agencies and newspapers;
- A community Infrastructure Levy payment towards primary and secondary school provision; and
- A community Infrastructure Levy payment towards healthcare.

SUSTAINABLE DEVELOPMENT IMPLICATIONS

Energy

755. 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 2010.
756. An Energy statement and Sustainability Assessment based on the Mayor's hierarchy have been submitted. Concerns raised in the GLA's Stage 1 report were addressed during the course of the application.

Be Lean (use less energy)

757. 'Be lean' refers to the approach taken by the design team to maximise the positive aspects of the scheme's passive design to minimise the base energy demand of the buildings. As part of this application, key passive ('Be Lean') design features include:
- The specification of a higher performing building fabric and improved airtightness to reduce winter heat loss will reduce the development's required heating energy;
 - Using mechanical ventilation with heat recovery;
 - The availability of daylight within the dwellings has been balanced with the overheating risk that solar gains can present; and
 - The use of an articulated façade provides effective solar shading during summer but retains opportunity for useful winter passive solar gain when the sun is lower in the sky
758. After the incorporation of 'Be Lean' passive and active energy efficiency measures, the domestic CO₂ emissions would be, 5% lower than a Part L1A 2013 compliant development, which is the baseline scheme. The non-domestic CO₂ emissions after the incorporation of 'Be Lean' measures would be 12% lower than a Part L2A compliant development.

Be Clean (supply energy efficiently)

759. The proposed design maximises energy efficiency and follows principles of good active system design. The building has been designed to be easily connected to and take advantage of the proposed district heating system to be installed in the local area – the South East London Combined Heat and Power network (SELCHP). This would be required by the Section 106 Agreement.
760. Without connection to SELCHP, 'Be Clean' measures would not provide any further reduction in CO₂ emissions above the 'Be Lean' measures.

Be Green (Low or Carbon Zero Energy)

761. Air Source Heat Pumps (ASHPs) are now proposed in place of the originally proposed on

site Combined Heat and Power (CHP) plant. These would produce low-grade heat which could then be boosted by gas boilers to provide higher grade heat to the site-wide heat loop. This combination would offer the best efficiency given the constraints of the site. This is a similar system and technology to that used in the award-winning Camden Council estate development at Agar Grove.

762. The GLA has requested that further information on the heat pumps, which should be secured by condition. This information should include:

- The heat pump's total capacity (kWth).
- An estimate of the heating and/or cooling energy (MWh/annum) the heat pumps would provide to the development and the percentage of contribution to the site's heat loads.
- Details of how the Seasonal Coefficient of Performance (SCOP) and Seasonal Energy Efficiency ratio (SEER) has been calculated for the energy modelling. This should be based on a dynamic calculation of the system boundaries over the course of a year i.e. incorporating variations in source temperatures and the design sink temperatures (for space heat and hot water).
- Manufacturer datasheets showing performance under test conditions for the specific source and sink temperatures of the proposed development and assumptions for hours spent under changing source temperatures. Whether any additional technology is required for hot water top up and how this has been incorporated into the energy modelling assumptions.
- An estimate of the expected heating costs to occupants, demonstrating that the costs have been minimised through energy efficient design.
- The expected heat source temperature and the heat distribution system temperature with an explanation of how the difference will be minimised to ensure the system runs efficiently.
- A commitment to monitor the performance of the heat pump system post-construction to ensure it is achieving the expected performance approved during planning.

763. 'Be Green' measures would provide a further 31% reduction in domestic emissions, amounting to a total saving of 36% across the residential component of the proposed development. This represents an annual saving of approximately 238 tonnes of CO₂.

764. Recognising that both the residential and commercial aspects would fall below the policy requirements in relation to carbon savings, the total contribution towards the council's carbon offset fund would be £430,440.00. The Applicant has agreed to make this contribution, which would be secured through the Section 106 Agreement and would therefore make this aspect of the scheme fully policy compliant. The carbon offset fund could be used for the installation of PV panels on existing buildings, insulation, tree planting, LED lightbulb exchanges, homeowner grants to replace boilers, funds for community led- projects etc.

Overheating

765. Policy 5.9 of the London Plan "Overheating and Cooling" states that major development proposals should reduce potential overheating and reliance on air conditioning systems and demonstrate this in accordance with the cooling hierarchy. This policy seeks to reduce the impact of the urban heat island effect.

766. In order to demonstrate compliance, the proposals would:

- Minimise internal heat generation through energy efficient design such as minimum pipework lengths, enhanced insulation standards, HIU cupboards where possible and a heating system that will be run at a low temperature;
- Low LED energy lighting
- Reducing the amount of heat entering the building in summer including glazing with a low solar heat transmittance (0.4) reducing likelihood of excessive internal gains;
- Use of thermal mass and high ceilings to manage the heat within the building
- Passive ventilation
- Mechanical ventilation including MVHR unit incorporating a summer by-pass for the heat exchanger

BREEAM

767. Strategic Policy 13 of the Core Strategy requires commercial units to achieve BREEAM “excellent” and community facilities to achieve “very good”. A BREEAM Pre-assessment has been undertaken which outlines the route to achieving ‘Very Good’ and ‘Excellent’ for the Civic Centre Church and the Livesey Place office respectively. A score of 68.39% has been targeted for the Civic Centre Church and 73.42% for the Livesey Place Office.
768. A planning condition is recommended to secure an independently verified BREEAM report demonstrating that these target ratings would be achieved through the detailed and technical design stages.

PLANNING OBLIGATIONS (Section 106 Undertaking or Agreement)

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

770. The application would be supported by the following Section 106 obligations:

Table: Section 106 Financial Obligations

Planning Obligation	Mitigation
Archaeology	£11,171.00
Affordable housing monitoring	£15,220.25 (115 affordable units x £132.35)
Carbon Offset – Green Fund	£430,440.00
Delivery and Service Plan bond	£37,786.00 ((372 homes x £100) + (2,693sqm non residential/500) x £100) The council will retain £1,600.00 for assessing the quarterly monitoring
Greenfield run off rates	£17,751.00 (£366 per cubic metre shortfall against greenfield run off rates)
Private/Communal amenity space	£61,848.50 (£205 per sqm shortfall)
Play Space	£91,943.90 (£151 per sqm shortfall)
Public Open space	£284,478.50 (£205 per sqm shortfall)
Contribution to pay for road through Frensham Street Park	Estimated cost: £193,000 The Council has commissioned a break down of the estimated costs of delivering the Frensham Street Park. The figure quoted here is the estimated cost of delivering the service road. The applicant has agreed to cover the final costs of

	the delivery of this road, which will be subject to detailed design and specification.
Transport for London Buses	£1,004,400 maximum capped contribution, to be drawn down according to TfL methodology review mechanism) (Maximum £2,700 per residential unit)
Transport for London Legible signage	Funded through CIL
Transport for London Healthy Streets	Funded through CIL
Transport for London cycle hire contribution	£18,600 (£50 per residential unit plus non residential contribution)
Construction Management Contribution	£14,880.00 (£40 per residential unit)
Trees	Whilst the proposed street trees are welcome, these on Old Kent Road may not be acceptable to TfL. Provision therefore needs to be made for this in a s106 agreement at a unit cost of £6,000 per tree
Arqiva Mitigation	Proportionate financial contribution based on the number of developments due to come forward and the expected cost of mitigating the impact
Admin fee	2% for all cash contributions plus flat fee of £2,000 for costs incurred in transferring TfL buses contribution

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

- Affordable housing provisions and delivery controls, including provision for an early stage review;
- Wheelchair accessible housing;
- Marketing, allocation and fit out of the wheelchair units
- Car park/Service bay/Site management plan;
- Appointment of workspace co-ordinator;
- Workspace Specification (including full M and E fit out);
- Triggers securing Practical Completion of workspace;

- 10% Affordable workspace – Available for 30 years minimum at £17 per sqft to the end user (subject to annual RPI increases);
- Affordable Workspace Management Plan, including marketing requirements;
- Appointment of specialist workspace provider;
- Retail Marketing Strategy;
- Church Relocation Strategy – including Commitment to help the church group find alternative temporary accommodation pending the replacement of their facility on site;
- Linear Park delivery provisions, including membership of Park Co. and financial contribution to maintenance of Frensham Street Park;
- Public realm works plan (including commitment to public access);
- Construction phase jobs, short courses and apprenticeships or Employment and Training Contribution;
- Employment, Skills and Business Support Plan (Construction Phase);
- End use phase jobs or End Use Shortfall Contribution (Note: construction and end use phase jobs have been calculated using the average figures provided for B1a and B1c and A1-A4 class spaces. The figures should be revisited when more precise figures are available);
- Skills and Employment Plan (End User Phase);
- Highway works – Section 278 agreements with both LBS and TfL;
- All new homes to be CPZ permit free, and this is to be made clear in marketing material;
- 4 no. electric vehicle charging bays;
- Car club membership for 3 years;
- Church Travel Plan and monitoring;
- Community Use Strategy associated with the church;
- Connection to a future district heating system (SELCHP);
- London Living Wage – best endeavours to being offered to all staff employed in the commercial units as well as workers during the construction period;
- Final Demolition and Construction Environment Management Plans;
- Final Delivery and Service Management Plan;
- Final Construction Logistics Management Plan;
- Local Procurement;
- Service charge costs to social rent tenants would be capped within social rent cap levels;
- Securing Maccreanor Lavington Architects to deliver the building detailed design, unless otherwise agreed in writing and Orbis ceramic mural specialists to manage the removal, storage and reinstatement of the listed mural;

772. The S106 heads of terms agreed would satisfactorily mitigate against the adverse impacts of the proposed development.

773. In the event that a satisfactory legal agreement has not been entered into by 5th May 2020, it is recommended that the Director of Planning refuses planning permission, if appropriate, for the following reason:

“The proposal, by failing to provide for appropriate planning obligations secured through the completion of a S106 agreement, fails to ensure adequate provision of affordable housing and mitigation against the adverse impacts of the development through projects or contributions in accordance with saved policy 2.5 'Planning Obligations' of the Southwark

Plan (2007), strategic policy 14 'Delivery and Implementation' of the Core Strategy (2011), policy 8.2 'Planning obligations' of the London Plan (2015) and the Planning Obligations and Community Infrastructure Levy SPD (2015)".

S278 Works Outline

774. The Council's Highway Officers have indicated that works required through a Section 278 Agreement would include:

- Resurface the carriageway of Livesey Place.
- Provide a 2.0 metre wide footway on either side of the Livesey Place up to the start of the proposed Livesey Mews.
- The proposed raised entry table at the junction of Peckham Road and Livesey Place should be constructed with granite blocks (300x150x100) in dark, mid and silver grey mix of colours.
- The proposed vehicle entrance should be designed and used as a turning head for vehicles that might enter the street inadvertently.
- Widen the footway on Peckham Road, on the development side, to at least 2.0 metres.
- Replace the three speed cushions with a raised link table with a pedestrian crossing facility.
- The proposed 3 trees on Livesey Mews should be planted to SSDM DS 501 with Silva Cells and rooting zones.

775. A separate Section 278 Agreement would be required with TfL.

Mayoral and Southwark Community Infrastructure Levy (CIL)

776. 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.

777. In this instance a Mayoral CIL payment of £2,432,100.00 and a Southwark CIL payment of £9,276,124.85 would be required (these are approximate figures). These are pre-social housing relief figures and accordingly would be reduced when the CIL Social Housing Relief claim is submitted after the grant of planning permission.

OTHER MATTERS

778. None

STATEMENT OF COMMUNITY INVOLVEMENT

779. Consultation was carried out by the applicant prior to the submission of the planning, and

during the consideration of the application. The consultation undertaken was carried out with the local community and key stakeholders from the area. This is summarised in the tables below, which are taken from the submitted Development Consultation Charter.

Table: List of meetings

Meetings	Date	Attendees	Summary of discussions
Pre application meetings	11 pre-application meetings and 5 post-submission meetings Post-submission meetings: December 2019 February 2019 March 2019 June 2019 September 2019	Council officers Design team members as necessary	<ul style="list-style-type: none"> - Land use - Approach to SIL land and employment re-provision - Design and townscape - Transport and highways - Landscape - Daylight, sunlight and microclimate - Unit mix - Affordable housing - Playspace approach
Councillor meetings	w/c 16th July 2018	Members of the design team Old Kent Road Ward Councillors: • Cllr Evelyn Akoto (Cabinet Member for Community Safety and Public Health_ • Cllr Richard Livingstone, (Cabinet Member for Environment, Transport Management and Air Quality)	<ul style="list-style-type: none"> - Infrastructure impact - Design - Affordable Housing - Height - Consultation - Heritage - Environment
	19th July 2018	Members of the design team Cllr Michael Situ (Old Kent Road Ward)	<ul style="list-style-type: none"> - Heritage - Affordable Housing - Public Realm - Height - Infrastructure impact
Resident group meeting	20th March 2019	Northfield House TRA	<ul style="list-style-type: none"> - Discussion around wider Old Kent Road schemes that have come forward recently. - Affordable housing quantum and approach. - Height/massing, the

			linear park, and the proposed new access road.
	w/c 23rd July	<ul style="list-style-type: none"> • Unwin and Friary Tenants and Residents' Association • The Ledbury Tenants and Residents' Association • Livesey Exchange 	<ul style="list-style-type: none"> - Phone conversations and subsequent emails were had over potential face-to-face meetings. - Introduction to the scheme's potential development
Design Review Panel	9th October 2017 12th June 2018	Design Panel members Officers Design team	<ul style="list-style-type: none"> - Design, layout and height.

Table: List of public consultation events carried out

Public consultation events	Date	Attendees	Summary of feedback
Public exhibition	Thursday 19 th July 2pm – 8pm	Project Team Cllr Michael Situ (Old Kent Road Ward) 14 members of the public	<ul style="list-style-type: none"> - Consideration of the listed mural and its preservation - Re-provision of the church use on-site - Affordable housing - Public realm enhancements sought after - Height of the design rationalised - Infrastructure impacts rationalised
Old Kent Road Forum	Saturday 8 th September 11am – 1pm	Project Team Officers Cllr Johnson Situ (Cabinet Member for Growth, Development and Planning) Old Kent Road Ward Councillors: <ul style="list-style-type: none"> • Cllr Evelyn Akoto (Cabinet Member for Community Safety and Public Health_ • Cllr Richard 	<ul style="list-style-type: none"> - Affordable housing - Height - Green and Open space - Retail provisions - OKRAAP - Meaningful Engagement

		Livingstone, (Cabinet Member for Environment, Transport Management and Air Quality) Cllr Michael Situ Dozens of members of the public	
Northfield House TRA	20 th March 2019	Members of the TRA Council Planning officer. Members of the design team	<ul style="list-style-type: none"> - Discussion around wider Old Kent Road schemes that have come forward recently. - Affordable housing quantum and approach. - Height/massing, the linear park, and the proposed new access road.

Consultations

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

Consultation Replies

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

SUMMARY OF CONSULTATION RESPONSES

782. This application was subject to an original round of statutory consultation and then a further 28 day re-consultation following revisions made to the proposals.

783. At the time of writing, a total of eight consultation responses had been received from members of the public and local businesses and organisations. All eight are against the proposed development. This includes responses that were received during, and beyond, the original statutory consultation and the subsequent re-consultation described above.

784. The main issues raised by residents objecting to the proposed development are:

- The buildings would be too tall and would harm the character or skyline;
- There would be harmful overlooking and loss of privacy;
- There would be a harmful loss of daylight and sunlight and harmful overshadowing;
- The proposal would be out of character with the surrounding area;
- The proposal would increase demand on existing local infrastructure and facilities;
- It would increase traffic;
- It would increase noise;
- It would increase light pollution;

- The proposals do not address the need for genuinely affordable housing;
- Not enough family housing is proposed;
- The architectural design proposed is poor;
- There would be health and safety concerns for the three local primary schools and nursery during construction;
- There would be overall health and safety concerns during the process of construction;
- The proposals would not meet the needs or desires of the existing community;
- The potential cumulative impacts of the proposals have not been sufficiently considered;
- The mural would not be appropriately displayed;
- The heritage value of the mural would be diminished in the way it is integrated in the new design proposal
- Storage and removal would compromise the mural;
- There is an unaddressed need for public space for performance, exhibitions, library and other community uses;
- Regeneration impacts on area if new high-rises are purchased as investment property and left empty contribute to future economic crash, unstable housing market and increased homelessness;
- Not enough schools and community services to support the proposed increase in population; and
- The proposals would result in poor air quality.

785. Officer response: All of the issues raised in these objections are addressed in full in the main body of the report. For reference to the specific areas raised please refer to the paragraphs identified in Table 8 below.

Objections	Summary of Response
The buildings would be too tall and would harm the character or skyline.	The acceptability of the tall buildings is discussed in the main body of this report in the section on design considerations. The proposal would be in compliance with the draft OKR AAP as well as adopted planning policy, being located in an Opportunity Area; at a point of landmark significance; and making a positive contribution to the landscape.
There would be harmful overlooking and loss of privacy.	This is addressed in the main body of this report in the section on the impact of the proposed development on the amenity of adjoining occupiers. There would not be any harmful overlooking or loss of privacy to neighbouring properties.
There would be a harmful loss of daylight and sunlight and harmful overshadowing.	A full daylight, sunlight and overshadowing assessment has been submitted and is summarised in the section of this report on the impact of the proposed development on the amenity of adjoining occupiers. This section concludes that there would be significant adverse impacts on some neighbouring residential properties in terms of daylight and sunlight. However, only very substantially lower massing would have a reduced impact, which would not deliver the wider regeneration benefits of the proposals under consideration here. It is also worth noting that the approved scheme at 16 Peckham Park Road would cause significant

	reductions in daylight to windows serving habitable rooms on the first floor of No. 12 and No. 14 Peckham Park Road, without the development under consideration here in place. On balance, these adverse impacts are considered to be outweighed by the regeneration benefits of the proposals.
The proposal would be out of character with the surrounding area.	The response of the design to the character of the area, including its Opportunity Area status, is addressed in the section of this report on design considerations. The design is considered to be of very high quality.
The proposal would increase demand on existing local infrastructure and facilities.	The draft OKR AAP looks holistically at the overall impact of increased population growth in the Old Kent Road area and how social infrastructure needs to be increased and improved as part of that growth, to ensure that sufficient infrastructure and facilities benefit local communities and newcomers equally. The CIL distribution and outcomes of the Social Regeneration Charter will ensure that the cumulative impact of the development schemes provide sufficient contribution to social infrastructure.
It would increase traffic.	Traffic impacts are considered in the Transport section of this report. The predicted trips are considered acceptable. The scheme would be car free with the exception of disabled car parking, and financial contributions would be made to Santander cycle hire and bus services. A cash bond will also be held against the submitted Delivery Service Plan and the pedestrian environment would be enhanced. A church Travel Plan would be secured and monitored through the Section 106.
It would increase noise.	Residential design standards ensure that negative impacts of noise between use classes are mitigated and kept at appropriate levels. The Council's Environmental Protection Team has reviewed the submitted material and is satisfied subject to recommended conditions.
It would increase light pollution.	Light pollution is addressed in the submitted ES and summarised in the relevant section of this report. Subject to mitigation, there would be no harmful light pollution. A condition is included in the draft recommendation to ensure this is the case.
The proposals do not address the need for genuinely affordable housing.	35% affordable housing is proposed, with 25.8% social rented and 9.2% intermediate. This is outlined in the Affordable Housing section of this report.
Not enough family housing is proposed.	The proposals were revised during the course of the application to include more family sized units. The housing mix overall would still fall slightly short of policy requirements, but the affordable component would be completely compliant.
The architectural design proposed is poor.	The merits of the architectural design are established in the Design Considerations section of this report. The architectural design is considered to be of the highest quality.
There would be health and safety concerns for	A final Construction Environment Management Plan is required by the Section 106 Legal Agreement.

the three local primary schools and nursery, during construction.	
There would be overall health and safety concerns during the process of construction.	A final Construction Environment Management Plan is required by the Section 106 Legal Agreement.
The proposals would not meet the needs or desires of the existing community.	The council has worked to balance the needs of new and existing communities in the Old Kent Road, and are working to improve the livelihoods and wellbeing of people living in this area. This is described in further detail in the OKRAAP and will be monitored through the social regeneration charter.
The potential cumulative impacts of the proposals have not been sufficiently considered.	The ES includes comprehensive cumulative assessment.
The mural would not be appropriately displayed.	The Section on Heritage Impacts addresses in detail the proposals for the mural. It would stay in its prominent location on the Old Kent Road, as an integral part of the new design. Further detail of the mural is provided in the Listed Building Consent report (18/AP/3285).
The heritage value of the mural would be diminished in the way it is integrated in the new design proposal.	
Storage and removal would compromise the mural.	
There is an unaddressed need for public space for performance, exhibitions, library and other community uses.	<p>A church facility is proposed, which would ne subject to a Community Use Strategy, secured through the Section 106 agreement.</p> <p>The small public square at the base of the Civic Tower would help create a civic presence for the church entrance and accommodate the congregation before and after services which further support community uses. A new park space will also be constructed immediately adjacent to the site, on the site of the Frensham Street depot.</p>
Regeneration impacts on area if new high-rises are purchased as investment property and left empty contribute to future economic crash, unstable housing market and increased homelessness.	35% affordable housing is proposed, with 25.8% social rented and 9.2% intermediate. This is outlined in the Affordable Housing section of this report.
Not enough schools and community services to support the proposed increase in population.	The draft OKR AAP looks holistically at the overall impact of increased population growth in the Old Kent Road area and how social infrastructure needs to be increased and improved as part of that growth, to ensure that sufficient infrastructure and facilities benefit local communities and newcomers equally. The CIL distribution and outcomes of the Social

	Regeneration Charter will ensure that the cumulative impact of the development schemes provide sufficient contribution to social infrastructure.
The proposals would result in poor air quality.	The proposals would be air quality neutral.

GLA

786. The GLA's Stage 1 response considers the principle of development and proposed land uses to be appropriate and generally in compliance with London Plan policies, particularly noting the coordinated approach to the managed release of industrial land. However, the report also raises a number of issues with the proposals that would not be in conformity. Through the application process, these have been addressed, as set out below.
787. Re-provision of employment floor space: The GLA considered that the proposed quantum of light industrial floorspace would not comply with policies, as it would be lower than both the site's existing level of industrial floorspace and its potential industrial capacity at 65% plot ratio. The required further information to demonstrate compliance (paragraphs 19-20 of London Plan).
788. Officer response: The 0.18 ha (1,800 sqm) of SIL on the application site would equate to 1,170 sqm of potential industrial floorspace capacity at 65% plot ratio. As this is greater than the existing industrial floorspace, a total of 1,170 sqm of industrial floorspace needs to be provided for the proposals to be considered to represent "no net loss". The proposals have been revised during the course of the application to deliver 2,193 sqm (GIA) B class floorspace, of which 1,271 sqm (GIA) would be secured as B1(c). This exceeds the potential for light industrial floor space (in SIL), calculated on a 65% plot ratio, by 47 sqm (GIA). On this basis, there would be no net loss of light industrial floorspace, as defined by the draft London Plan. This would be secured through a condition.
789. In response to GLA concerns about the design of the B1(c) space, a number of revisions have been made. For example, the quantum of floor space with 8m floor to ceiling heights has been increased and a second goods lift has been introduced.
790. Place of Worship: The GLA strongly supports the provision of an enhanced facility for a local church group, which is in line with policy. They recommend that a commitment to help the local church group find alternative temporary accommodation pending the completion of the replacement facility should be secured.
791. Officer Response: The GLA's support is noted and the measures described would be secured through the Section 106 Legal Agreement. The applicant advises that arrangements are already in place for the temporary relocation of the church.
792. Housing and Affordable Housing: The GLA raised concerns that the scheme would deliver 32.4% affordable housing by habitable room, which would not meet the Fast Track Route for Applications. Whilst they welcomed the mix of 1, 2 and 3 bed dwellings, they also raised concern that the percentage of 3 bed units was low.
793. Officer Response: The scheme has been revised since it was reviewed by the GLA, and now proposes 35% affordable housing by habitable room. This is discussed in further detail in the main body of this report. Revisions have also been made to introduce more 3 bed units,

bringing the total up to 31 (37.3% of the social rented housing). The affordable component of the scheme would fully comply with Southwark's Housing Mix policy.

794. Play Space: The GLA considered the proposed provisions of on-site play space to be acceptable subject to the council securing details by condition.

795. Officer Response: Details of play space would be secured by condition.

796. Design and Conservation: The design approach, including the proposed density, height scale and massing, and "high quality of architecture", is broadly supported but amendments are required to improve the quality of the public realm, the residential quality, and the use of the employment space as genuine B1c space. Additional information and amendments requested are as follows:

- Confirmation of width at the base of the tower;
- Analysis of pedestrian routes and desire lines, including congregational worshippers;
- The proposed use of the 'shared space' on Livesey Mews for play is inappropriate;
- A joined up approach to the public realm strategy (particularly Frensham Street Park and Linear Park);
- Improve activity on Livesey Place frontage; and
- Confirmation that microclimatic studies have informed the proposed massing.

797. The GLA also confirms that the proposals would not harm the composition of strategic protected views. In relation to the impact of the proposals on designated heritage assets, the GLA concluded that the impact would generally be neutral. Where some less than substantial harm to the setting of the Glengall Road Conservation Area is identified, they conclude that this would be outweighed by the benefits of the proposals. In relation to the removal and relocation of the listed mural, the GLA raises no objection, but recommends that appropriate conditions relating to a methodology for removal, storage and re erection and a requirement re-instate the mural prior to the occupation of the building should be secured.

798. Officer Response: The new square proposed at the base of the tower, and the widened footway on Old Kent Road would create sufficient gathering space to accommodate the church congregation. The landscape proposals would link well with the proposed linear park, improving connections and desire lines in the wider area. In order to ensure consistency along the Linear Park, the landscape proposals for this development need to be carefully coordinated with those of the neighbouring sites. There have been a number of meetings with adjoining landowners to ensure that this is the case, and the council is currently producing a public realm guidance strategy. The play space has been removed from Livesey Mews. The combination of residential lobbies, church entrance, retail and commercial spaces on ground floor would activate the ground floor frontages well. The ES sets out microclimatic studies and shows how the design was influenced by the results.

799. Residential Quality: This is generally considered efficient and the approach is supported. The GLA recommended that the corridors at Levels 1 and 2 in the Livesey Place building would benefit from natural daylight/ventilation. Two north facing single aspect units in that building are also identified, although it is noted that there is a good proportion of dual aspect overall. The GLA requested ADF testing of the proposed layout.

800. Officer Response: The quality of residential accommodation proposed, including daylight levels is good. Of the 136 single aspect homes, none would face directly north, but 67 would

face north-east or north-west. 1 would be in the Livesey Building, looking directly over the podium garden within the proposed development.

801. Climate Change: The GLA report required the exploration of additional measures aimed at achieving further carbon reductions. Further information was also required with regards to cooling, the proposed CHP, the site-wide network, the centralised energy centre, and the surface water drainage strategy.
802. Officer response: The information required by the GLA has been provided. Since the first round of consultation and in response to GLA concerns, the CHP has been removed from the proposed energy strategy and replaced with Air Source heat pumps. These would produce low-grade heat which can then be boosted by gas boilers to provide higher grade heat to the site-wide heat loop. This combination offers the best efficiency given the constraints of the site.
803. The proposed development would ensure that the buildings would be protected from surface water flooding by raising ground levels and placing residential units at levels above the proposed podiums. A Drainage Management Plan (DMP) has been prepared to ensure the Proposed Development does not increase surface water runoff once in operation. Sustainable Drainage Systems (SuDS) in the form of green/brown/blue roofs and permeable paving are also proposed in addition to the large area of lawn in the new park. As greenfield run off rates are not achieved however, a financial contribution is required.
804. Air Quality: The GLA recommends that the Council should ensure that the mitigation measures set out in the Air Quality Assessment are secured.
805. Officer Response: Air Quality measures will be secured by condition.
806. Transport: The GLA report raised concerns over the capacity of the public transport network to accommodate additional travel generated by developments in the Old Kent Road Opportunity Area. They required contributions towards improvements to and for bus services and active travel as a result. The report also notes that cycle parking proposals and disabled persons' parking do not comply with London Plan / draft London Plan policy. The quality of the public realm on Old Kent Road for walking is questioned and they state that the foundations of the proposed development must allow for future delivery of the Bakerloo Line Extension.
807. Officer response: A financial contribution towards improved bus services would be secured. The cycle parking would comply with the current London Plan Standards. Detailed design would be required by condition. The footway on Old Kent Road would be widened, and substantially enhanced. Foundation design details would be secured by condition, upon which TfL would be consulted.

TfL

808. Principle of Development: TfL note that there is only limited capacity on the transport network to accommodate the demand generated by additional homes and jobs in the Old Kent Road area in advance of the opening of the planned BLE. Ahead of this, some development could be accommodated through improvements to the existing primarily bus-based transport and to active travel.

809. Officer Response: As noted by TfL, The GLA, TfL and LBS are in discussions regarding an area-wide approach to increasing the capacity of the transport network. Financial contributions would be secured towards busses and Santander Cycle Hire.
810. Bakerloo Line Extension: TfL has been identifying the potential BLE tunnel alignment routes to connect the proposed BLE stations. Whilst this work is subject to further development and future consultation, TfL confirm that work to date suggests a desire to run tunnels under the application site. TfL therefore requested that the applicant should engage with them in order to secure conflict-free corridors for running tunnels prior to construction and that the Council confirms that TfL has no objection in this respect prior to determination.
811. Officer Response: The applicant has met with TfL to discuss this and to the best of our knowledge the application would not impede the delivery of the BLE at that location. Specifically the applicant has explained a draft Conceptual Design Statement (CDS) has been produced which outlines the design considerations and methods that will be adopted in the detailed design stage and be subject to a condition, the objective of which will demonstrate the impact on the tunnels will satisfy TfL required criteria.
812. Walking and the Public Realm: TfL raise concerns regarding the width of the footway on Old Kent Road/ Peckham Park Road, which may not provide a suitable setting for the tall building or the proposed “town centre” status of the street. They do however note that it is “likely (though not proven)” that the width of footway would not give rise to a low “Pedestrian Comfort Level” (according to their own methodology).
813. Officer Response: The proposed development would provide new arrangements on the Old Kent Road, including a wider footway. As the ground floor would be recessed there would be extra comfort level for pedestrians. After phase one is delivered the crossover for Topps Tiles car park will be returned to footway and leads on to the new linear park. Pedestrians would be able to access from the rear and side of the building from the new park areas. The area of Livesey Place closest to the park will only allow emergency and essential servicing vehicles access therefore allowing for pedestrian priority.
814. Cycle Parking: TfL note that the proposed cycle parking volume appears to meet current London Plan quantity standards, but they do not consider it clear as to whether new draft London Plan higher minimum standards have been applied to short-stay parking for A-class uses and long-stay parking for office uses. They also take the view that the proposed cycle parking is substantially sub-standard in terms of “accessibility to and of the stands proposed”.
815. Officer Response: The cycle parking complies with the current London Plan Standards. 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. Officers consider accessibility to and of the stands to be of a good standard, which would encourage and increase cycle use.
816. Cycle stands: TfL note in relation to accessibility of the stands, that 95% of proposed cycle parking would be in two-tier stands. TfL consider that these make the cycle parking at best inconvenient and difficult to use for able-bodied adult cyclists, and at worst totally inaccessible to those with non-standard bikes (including children’s bikes) or without a good

level of physical strength and dexterity. At ground floor and basement, they recommend changes to the layout that would enhance access to cycle parking from the street and highlight that issue of accessibility to cycle parking raises issues of equality “since those with the protected characteristics of age, disability and sex will be disproportionately affected.”

817. Officer Response: The constraints of the site are such that it is likely that the cycle parking will predominately be provided using a two-tier parking system. A total of 5% of long stay cycle parking spaces will be provided by way of Sheffield stands that will be capable of accommodating larger cycle parking spaces in accordance with London Cycle Design Standards. Detailed design would be secured by condition. Financial contributions would also be made to Santander cycle hire. Officers consider accessibility to and of the stands to be of a good standard, which would encourage and increase cycle use. Officers do not consider that this gives rise to equality issues in relation to the age or sex of cyclists. In relation to disability, larger spaces would be available for tricycles and specialised cycles.
818. Cycle routes: TfL express disappointment that a single cycle route has been assessed using the Cycling Level of Service method. They recommended that the Council secures a more comprehensive assessment of routes to a number of key destinations such as local schools and parks (i.e. not just Elephant and Castle) and funding to address deficiencies identified.
819. Officer Response: During the development of the proposals it was acknowledged that a Cycling level of service (CLOS) carried out for the TA of the Malt Street Regeneration was viable for this site. This encompassed routes through Burgess Park towards Elephant and Castle, South Bermondsey Station, Queens Road Peckham Station, Peckham High Street and Surrey Canal Station, as well as routes to Quietway 1. The assessment recorded scores ranging from 34 to 70 for the routes. A score of 70 is seen to reflect a good score. There were no critical scores recorded.
820. Car Parking: TfL advise that the two standard parking spaces proposed would not comply with policy. They also request full explanation and justification of the proposed use of the three “temporary parking” bays on ground floor. TfL accept that short-term set down and pick up activity should be accommodated on-site, with clear methods of control. TfL also note that London Plan policy requires a minimum of one accessible space per non-residential use within the development and therefore consider that this parking is not policy-compliant.
821. Officer Response: The proposal is car free but does provide 16 off street disabled parking bays in the basement car park which will be accessed from Livesey Place via the proposed new access road from Frensham St. 15 of the disabled bays will be prioritised for residents, 1 disabled bay will be available to the returning church. There are also 6 bays, 2 in the basement and 4 at ground floor to provide off street servicing and short stay for resident services like a carer or repairs and maintenance operatives. If bays for disabled parking are not required these bays can be utilised for other uses like extending cycle parking, e-charging and visitor parking or car club bays. They cannot be allocated to individual residential units. The car park included e-charging for 4 spaces and all the remaining bays could be adapted for e charging in the future. A car parking management strategy would be required by the Section 106 agreement.
822. Car Parking Permits: TfL advise that it will be necessary to exclude residents from eligibility for on-street parking permits within the existing Controlled Parking Zone, in line with Policy T6.1. Electric vehicle charging points are proposed to meet the London Plan minimum standards but we would encourage provision of a greater proportion.

823. Officer Response: There will be a clause in the Section 106 Agreement preventing residents or occupiers of the proposed development from obtaining residents parking permits for any future CPZ. Comments on electric vehicle charging are noted.
824. Public and Active Transport: TfL's consultation response requests a "considerable contribution towards enhanced bus services".
825. Officer Response: The financial contribution agreed with TfL would be secured through the Legal Agreement.
826. Travel Plans: TfL welcome the draft travel plans submitted for the church, residential and workplaces, but consider that they are of poor quality and require significant revision.
827. Officer response: Southwark Transport Policy Officers no longer require Travel Plans for the residential or commercial development. They consider that the proposed Delivery Service Plan (DSP) bond is a more robust approach to ensuring appropriate travel to and from the site. As the church would not be subject to the DSP bond, a travel plan is required for this use. Officers are broadly satisfied with the draft submitted, and will secure a final version and monitoring methodology through the Section 106 Legal Agreement.
828. Servicing: TfL consider the analysis of servicing to be robust, and welcome the provision of servicing bays and demonstration that they can accommodate demand. They also welcome the submitted draft Delivery and Servicing Plan (DSP), but note that it does not contain measures or safeguards to secure the key provisions, particularly avoiding peak hour goods vehicle movements.
829. Officer Response: TfL's comments are noted. Southwark Transport Policy Officers are satisfied with the submitted DSP.
830. Construction: No Construction Management Plan has been submitted, it is recommended that an appropriate plan is secured by condition.
831. Officer response: A draft Construction Management Plan was submitted and reviewed by Southwark Officers. This was confirmed by TfL. A final version will be secured through the Section 106 Legal Agreement.

London Underground

832. No comments to make on the application. The previously discussed BLE comments were from TfL's BLE project team.

Metropolitan Police

833. The Designing Out Crime Officer advises that they have met with the applicant and is satisfied that, should this application proceed, it should be able to achieve the security requirements of Secured by Design with the guidance of both Secured by Design Homes 2016 and Commercial 2015 guides. A two - part condition (pre-commencement of works and pre-occupation) requiring the proposed development to adhere to the principles and physical security requirements of Secured By Design is recommended.

834. Officer response: The recommended conditions are included with this recommendation.

Natural England

835. No comments to make on the application.

Environment Agency

836. Planning permission should only be granted subject to the conditions recommended.

837. Officer response: The recommended conditions are included.

Health and Safety Executive (HSE)

838. As the proposed development does not lie within the consultation distance of a major hazard site or major accident hazard pipeline, there is no need to consult HSE on this application, and HSE therefore has no comments to make.

Historic England (HE)

839. Historic England has no significant concerns with the proposed demolition of buildings on site. However, they advise that in determining the listed building consent application, the council needs to be satisfied that sufficient information has been provided regarding the removal, storage and relocation of the mural. They also note the need to consult 20th Century Society.

840. Officer Response: These issues are dealt with in detail in the associated application for Listed Building Consent (18/AP/3285), including consultation response from the 20th Century Society.

841. HE considers that this proposal would have significant townscape impact in a wide range of views affecting the historic environment. They consider the most significant impact to be on the following views from the submitted Townscape, Built heritage and Visual Amenity assessment:

- View 9: HE considers that this view demonstrates that the proposed tall buildings would rise significantly above the currently uninterrupted roofline of the Grade II listed buildings along Glengall Road and Glengall Terrace, significantly affecting this key view within the Glengall Road Conservation Area;
- View 7: Although HE acknowledge that views further north along the lakeside pathway more successfully capture the unspoilt character of the Cobourg Road Conservation Area, and provide greater visibility of its Grade II listed townhouses, and the Grade II listed former Church of St Mark (now the New Peckham Mosque), they note that the proposed development would rise substantially above the existing tree and roofline resulting in a dominant intrusion on the skyline. This would significantly reduce the attractive and picturesque qualities of the conservation area in views from Burgess Park; and
- View 17: HE acknowledge that the proposed scheme would appear clustered amongst the Ledbury Estate buildings, in this view, but consider that it would nonetheless have an incremental effect on the relatively enclosed setting of the Caroline Gardens Conservation Area and component listed buildings. They also note

that the proposed buildings, which would be taller than the Ledbury Estate, would appear more prominently in views of Caroline Gardens at its south east end along Asylum Road.

842. In concluding, HE note that they have already raised growing concern about the recent run of tall building proposals along the Old Kent Road, particularly in the absence of an adopted policy for tall building development in this area. As set out in their Tall Buildings guidance (Advice Note 4, December 2015), tall building development should follow a plan-led approach rather than a reaction to speculative development applications. They therefore continue to recommend that the Area Action Plan for the Old Kent Road, which remains at draft stage, takes account of the existing townscape character and heritage interests to avoid causing serious harm to the historic environment across the Borough and beyond.
843. Officer Response: The impact of the proposed development on sensitive views is assessed in the Heritage Considerations section of this report; where full commentary is also given on HE's other comments. The locations of tall buildings in Old Kent Road are determined as part of a plan led approach, as set out in the "Stations and Crossings" strategy in the draft OKR AAP. This scheme is in keeping with that strategy.

Arqiva

844. Arqiva object to the proposed development because, like other schemes along the Old Kent Road, this proposal would affect their line of sight dish link between BBC Broadcasting House and our broadcast installation at Wrotham, causing significant disruption to broadcast radio services, against the public interest. In the light of this and the other schemes along the Old Kent Road, they have been exploring the possibility of alternative routing for this link. This work is ongoing and they consider that implementation should be subject to contributions from the various developers.
845. Officer response: It is considered reasonable to request a proportionate financial contribution from the applicant in this case, to be paid towards the cost of disruption to be based on the number of developments due to come forward within the line of broadcast and the expected cost of mitigating the impact. This contribution can then be replicated across other schemes and it is for Arqiva to satisfy us that their estimate is reasonable. This payment will be secured through the Section 106 in consultation with Arqiva.

Thames Water

846. Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. As such, they have requested a condition preventing any properties being occupied until confirmation has been provided that either all water network upgrades required to accommodate the additional flows from the development have been completed; or a housing and infrastructure phasing plan has been agreed with Thames Water.
847. The magnitude of this development is such that significant water network and treatment infrastructure upgrades will be required to accommodate the development. As such, Thames Water have also requested a condition requiring an integrated water management strategy to ensure that sufficient capacity is made available to cater for the new development.

848. They also advise that there are water mains crossing or close to the proposed development. Construction over or within 3m of water mains is not permitted. The applicant must check that the proposed development wouldn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way.
849. In relation to waste, Thames Water confirmed that there will be sufficient capacity in the sewerage network to accept the surface water discharge rate provided to Thames Water, which consists of two connections with discharge rates of 2.5 l/s each (5 l/s total discharge). This represents a more stringent discharge rate to those originally proposed in the drainage strategy submitted with the planning application.
850. This does not preclude the requirement as set out by the Policy 5.13 of the London Plan or the proposed discharge rate as agreed with the Lead Local Flood Authority. Management of surface water from the site should follow Policy 5.13 of the London Plan and policy AAP11 of the Old Kent Road Area Action Plan, which requires the development to achieve 100% greenfield runoff rates using the drainage hierarchy.
851. Officer Response: Recommended conditions and informatives have been included in the draft decision notice. It should also be noted that an Opportunity Area-wide Integrated Water Management Strategy (IWMS) is currently being produced. The scheme doesn't quite meet greenfield run off rates. However, the building of the park at Frensham Street should reduce water flows to the combined sewer.

Network Rail

852. Network rail are concerned by the cumulative impact that this and other proposed developments in the area will have on stations at Queens Road Peckham and South Bermondsey. No formal objection is made however.

UK Power Networks

853. UKPN made a standard objection to the application. In order to overcome this, the Applicant is required to pay for "diversionary works", which they advise they are in the process of doing. A condition is included to require evidence that this has been concluded.

Internal Consultees

854. The advice received from other Southwark Officers has been summarised in the table below. Further detail is provided throughout this report.

Officer	Summary of comments	Officer response
Urban Forester	Approve subject to conditions	Recommended conditions included
Local Economy Team (LET)	Approve subject to recommended contributions	Recommended contributions to be secured through the S106
Environmental Protection Team (EPT)	Approve subject to conditions	Recommended conditions included with this report, or as clauses in S106. The removal of the CHP plant means that the development is now air quality neutral and no off-

		setting / NO2 mitigation is required.
Ecology Team	Approve subject to conditions	Recommended conditions included, including further survey work. Number of nesting features below recommendations and recommended to use internal bricks for swifts.
Flood risk and drainage team	Payment will be incurred due to the shortfall in storage volume for the 1 in 100yr event plus 40% climate change.	Approve subject to conditions and payment to be secured through S106 agreement.
Transport	Approve subject to conditions and Section 106 clauses.	Recommended conditions included with this report, or as clauses in S106.
Highways	Approve subject to agreement to enter into S278 Agreement.	Requirement for S278 Agreement will be secured through S106.
Public Health	No conditions required.	No conditions required.
Planning Policy	Advice given on emerging policy and waste apportionment.	Advice included in relevant paragraphs of this report.
Archaeology	Approve subject to conditions.	Recommended conditions included.

Community impact statement / Equalities Assessment

855. The Public Sector Equality Duty (PSED) contained in Section 149 (1) of the Equality Act 2010 imposes a duty on public authorities to have, in the exercise of their functions, due regard to three “needs” which are central to the aims of the Act:
- a) The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
 - b) The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:
 - Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
 - Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it
 - Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low
 - c) The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to tackle prejudice and promote understanding.
856. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

857. The Council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights
858. The Council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application. This is addressed in detail in the relevant section of this report.

CONCLUSION ON PLANNING ISSUES

859. 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 homes in the area.
860. The provision of specifically designed B1c light industrial floorspace is welcomed and would be capable of forming a successful employment cluster with the Nye's Wharf and Malt Street proposals.
861. In advance of adopted town/district centres in the Old Kent Road, the quantum of town centre uses including retail, offices and leisure/community uses accords with the sequential approach to development and therefore can be supported.
862. The proposed mix of uses would add to the vibrancy of the area which would be complemented by public realm improvements to Old Kent Road, Peckham Park Road and Livesey Place. The new Linear Park and Frensham Street park would significantly improve amenity provision within the area.
863. The scheme would deliver the following major regeneration benefits:
- 372 new homes to the borough's housing stock;
 - 35% affordable housing overall (25.8% social rented and 9.2% intermediate);
 - The re-provision of B1(c) light industrial floorspace;
 - 10% affordable workspace;
 - The re-provision of the Everlasting Arms Ministries Church;
 - 87-109 new full time equivalent jobs, an uplift of 69-86 jobs on the site;
 - A contribution to the Linear Park, including delivery mechanisms secured through the Section 106;
 - Improvements to Old Kent Road, Peckham Park Road and Livesey Mews;
 - An uplift in the number of trees and ecology value of the site; and
 - Improved connectivity for cyclists and pedestrians.
864. The proposals would deliver a 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. The scheme would include a majority of dual aspect units of 63.4% which is considered very good taking into account the high density of the scheme. Whilst there would be some homes with no external private amenity space, this is compensated for with additional internal living space and financial contributions.
865. The transport issues associated with this scheme have been addressed through negotiation, and it would provide good quality pedestrian and cycle permeability and residential

management to reduce the impact of servicing and delivery whilst allowing for the emerging plans for the surrounding public highway to be facilitated.

- 866. The impacts of the scheme on neighbouring properties in relation to daylight and sunlight would in a number of cases be of major adverse magnitude. However, only very significantly lower massing, which would fail to deliver the new homes, jobs and other regeneration benefits proposed here, would have a materially lower daylight impact. Furthermore, in many cases, where the results would not satisfy the BRE Guidelines, the retained levels would be within the range considered acceptable for an urban location.
- 867. The architectural design is considered to be of the highest quality and, any harm to the settings of surrounding conservation areas is considered to be outweighed by the major regeneration benefits of the proposals. The Grade II mural would be re-instated in the new development, resulting in no harm to its heritage significance.
- 868. 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 agreement of a Section 106 Legal Agreement under the terms as set out above.

Human rights implications

- 869. This planning application engages certain human rights under the Human Rights Act 1998 (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.
- 870. This application has the legitimate aim of providing new mixed use development. 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 INFORMATION

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Place and Wellbeing Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 0254 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	Sarah Parsons, Team Leader	
Version	Final	
Dated	21 October 2019	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
Date final report sent to Constitutional Team		24 October 2019

Appendix 1: Consultation undertaken

Site notice date: 19/10/2018

Press notice date: 01/11/2018

Case officer site visit date: 23/10/2018

Neighbour consultation letters sent: 25/10/2018

Internal services consulted

Ecology Officer

Economic Development Team

Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]

Flood and Drainage Team

HIGHWAY LICENSING

Highway Development Management

Housing Regeneration Initiatives

Parks & Open Spaces

Property Division

Public Health Team

Waste Management

Statutory and non-statutory organisations

Arqiva - digital communications

Arqiva, Winchester Court

Civil Aviation Authority

Council for British Archaeology

Environment Agency

Greater London Authority

Health & Safety Executive

Historic England

London Borough of Lewisham

London Fire & Emergency Planning Authority, Fire Safety Regulations

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)

UK Power

Unwin and Friary TRA, 1 Cardiff House

Vital OKR

Neighbour and local groups consulted:

27 Lewes House Friary Estate Green Hundred Road London
24 Lewes House Friary Estate Green Hundred Road London
25 Lewes House Friary Estate Green Hundred Road London
26 Lewes House Friary Estate Green Hundred Road London
7 Exeter House Friary Estate Friary Road London
8 Exeter House Friary Estate Friary Road London
9 Exeter House Friary Estate Friary Road London
6 Exeter House Friary Estate Friary Road London
3 Exeter House Friary Estate Friary Road London
4 Exeter House Friary Estate Friary Road London
Flat 20 Lynn House Friary Estate Green Hundred Road
Flat 21 Lynn House Friary Estate Green Hundred Road
Flat 22 Lynn House Friary Estate Green Hundred Road
Flat 2 Lynn House Friary Estate Green Hundred Road
Flat 17 Lynn House Friary Estate Green Hundred Road
Flat 18 Lynn House Friary Estate Green Hundred Road
Flat 19 Lynn House Friary Estate Green Hundred Road
Flat 23 Lynn House Friary Estate Green Hundred Road
7A Peckham Park Road London SE15 6TR
21B Peckham Park Road London SE15 6TR
9A Peckham Park Road London SE15 6TR
Council Depot Frensham Street London
First Floor 636 Old Kent Road London
Front of 636 Old Kent Road London
Flat 35 Northfield House Friary Estate Peckham Park Road
Flat 4 Northfield House Friary Estate Peckham Park Road
Flat 44 Northfield House Friary Estate Peckham Park Road
5 Exeter House Friary Estate Friary Road London
1 Lewes House Friary Estate Green Hundred Road London
14 Lewes House Friary Estate Green Hundred Road London
15 Lewes House Friary Estate Green Hundred Road London
16 Lewes House Friary Estate Green Hundred Road London
13 Lewes House Friary Estate Green Hundred Road London
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12 Lewes House Friary Estate Green Hundred Road London
52 Ethnard Road London SE15 1RU
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46 Ethnard Road London SE15 1RU
48 Ethnard Road London SE15 1RU
58 Ethnard Road London SE15 1RU
66 Ethnard Road London SE15 1RU
68 Ethnard Road London SE15 1RU
64 Ethnard Road London SE15 1RU
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60 Ethnard Road London SE15 1RU

62 Ethnard Road London SE15 1RU
2 Ethnard Road London SE15 1RU
22 Ethnard Road London SE15 1RU
18 Ethnard Road London SE15 1RU
9 Canal Grove London SE15 1LB
12 Ethnard Road London SE15 1RU
14 Ethnard Road London SE15 1RU
24 Ethnard Road London SE15 1RU
34 Ethnard Road London SE15 1RU
36A Ethnard Road London SE15 1RU
4 Ethnard Road London SE15 1RU
32 Ethnard Road London SE15 1RU
26 Ethnard Road London SE15 1RU
28 Ethnard Road London SE15 1RU
612 Old Kent Road London SE15 1JB
Flat 28 Lynn House Friary Estate Green Hundred Road
Flat 29 Lynn House Friary Estate Green Hundred Road
Flat 3 Lynn House Friary Estate Green Hundred Road
Flat 27 Lynn House Friary Estate Green Hundred Road
Flat 24 Lynn House Friary Estate Green Hundred Road
Flat 25 Lynn House Friary Estate Green Hundred Road
Flat 26 Lynn House Friary Estate Green Hundred Road
10B Ethnard Road London SE15 1RU
16A Ethnard Road London SE15 1RU
16B Ethnard Road London SE15 1RU
10A Ethnard Road London SE15 1RU
620 Old Kent Road London SE15 1JB
630 Old Kent Road London SE15 1JB
593-613 Old Kent Road London SE15 1LA
Flat 1 Lynn House Friary Estate Green Hundred Road
Flat 14 Lynn House Friary Estate Green Hundred Road
Flat 15 Lynn House Friary Estate Green Hundred Road
Flat 16 Lynn House Friary Estate Green Hundred Road
Flat 13 Lynn House Friary Estate Green Hundred Road
Flat 10 Lynn House Friary Estate Green Hundred Road
Flat 11 Lynn House Friary Estate Green Hundred Road
Flat 12 Lynn House Friary Estate Green Hundred Road
Flat 5 610 Old Kent Road London
Flat 6 610 Old Kent Road London
Flat 7 610 Old Kent Road London
Flat 4 610 Old Kent Road London
Flat 1 610 Old Kent Road London
Flat 2 610 Old Kent Road London
Flat 3 610 Old Kent Road London
Flat 8 610 Old Kent Road London
19B Peckham Park Road London SE15 6TR
Ground Floor Front 16 Peckham Park Road London
Ground Floor Rear 16 Peckham Park Road London
Flat 12 610 Old Kent Road London
Flat 9 610 Old Kent Road London
Flat 10 610 Old Kent Road London

Flat 11 610 Old Kent Road London
The Lodge Sandgate Trading Estate Sandgate Street
Flat B 616 Old Kent Road London
Flat C 616 Old Kent Road London
Flat A 616 Old Kent Road London
19A Peckham Park Road London SE15 6TR
Flat 2 8 Ethnard Road London
Flat 1 8 Ethnard Road London
1A Livesey Place London SE15 6SL
The Everlasting Arms Ministry 600-608 Old Kent Road London
40A Ethnard Road London SE15 1RU
40B Ethnard Road London SE15 1RU
524 Old Kent Road London SE1 5BA
9D Peckham Park Road London SE15 6TR
Flat A 614 Old Kent Road London
Luxford Bar 610 Old Kent Road London
6 Canal Grove London SE15 1LB
7 Canal Grove London SE15 1LB
8 Canal Grove London SE15 1LB
5 Canal Grove London SE15 1LB
2 Canal Grove London SE15 1LB
3 Canal Grove London SE15 1LB
4 Canal Grove London SE15 1LB
7C Peckham Park Road London SE15 6TR
7B Peckham Park Road London SE15 6TR
1B Livesey Place London SE15 6SL
1C Livesey Place London SE15 6SL
1D Livesey Place London SE15 6SL
Flat 1 Lyons Court 35 Green Hundred Road
Flat 6 Lyons Court 35 Green Hundred Road
626B Old Kent Road London SE15 1JB
9C Peckham Park Road London SE15 6TR
Flat 5 Lyons Court 35 Green Hundred Road
Flat 2 Lyons Court 35 Green Hundred Road
Flat 3 Lyons Court 35 Green Hundred Road
Flat 4 Lyons Court 35 Green Hundred Road
Flat 37 Northfield House Friary Estate Peckham Park Road
Flat 38 Northfield House Friary Estate Peckham Park Road
Flat 39 Northfield House Friary Estate Peckham Park Road
Flat 36 Northfield House Friary Estate Peckham Park Road
Flat 33 Northfield House Friary Estate Peckham Park Road
Flat 34 Northfield House Friary Estate Peckham Park Road
Flat 45 Northfield House Friary Estate Peckham Park Road
Flat 46 Northfield House Friary Estate Peckham Park Road
Flat 43 Northfield House Friary Estate Peckham Park Road
Flat 40 Northfield House Friary Estate Peckham Park Road
Flat 41 Northfield House Friary Estate Peckham Park Road
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Flat 24 Northfield House Friary Estate Peckham Park Road
Flat 25 Northfield House Friary Estate Peckham Park Road

Flat 22 Northfield House Friary Estate Peckham Park Road
Flat 2 Northfield House Friary Estate Peckham Park Road
Flat 20 Northfield House Friary Estate Peckham Park Road
Flat 21 Northfield House Friary Estate Peckham Park Road
Flat 26 Northfield House Friary Estate Peckham Park Road
Flat 30 Northfield House Friary Estate Peckham Park Road
Flat 31 Northfield House Friary Estate Peckham Park Road
Flat 32 Northfield House Friary Estate Peckham Park Road
Flat 3 Northfield House Friary Estate Peckham Park Road
Flat 27 Northfield House Friary Estate Peckham Park Road
Flat 28 Northfield House Friary Estate Peckham Park Road
Flat 29 Northfield House Friary Estate Peckham Park Road
Flat 47 Northfield House Friary Estate Peckham Park Road
Flat 58 Northfield House Friary Estate Peckham Park Road
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Flat 60 Northfield House Friary Estate Peckham Park Road
Flat 57 Northfield House Friary Estate Peckham Park Road
Flat 54 Northfield House Friary Estate Peckham Park Road
Flat 55 Northfield House Friary Estate Peckham Park Road
Flat 56 Northfield House Friary Estate Peckham Park Road
Flat 61 Northfield House Friary Estate Peckham Park Road
Flat 66 Northfield House Friary Estate Peckham Park Road
Flat 67 Northfield House Friary Estate Peckham Park Road
Flat 68 Northfield House Friary Estate Peckham Park Road
Flat 65 Northfield House Friary Estate Peckham Park Road
Flat 62 Northfield House Friary Estate Peckham Park Road
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Flat 64 Northfield House Friary Estate Peckham Park Road
Flat 51 Northfield House Friary Estate Peckham Park Road
Flat 52 Northfield House Friary Estate Peckham Park Road
Flat 6 Northfield House Friary Estate Peckham Park Road
Flat 50 Northfield House Friary Estate Peckham Park Road
Flat 48 Northfield House Friary Estate Peckham Park Road
Flat 49 Northfield House Friary Estate Peckham Park Road
Flat 5 Northfield House Friary Estate Peckham Park Road
Flat 7 Northfield House Friary Estate Peckham Park Road
Flat 102 Northfield House Friary Estate Peckham Park Road
Flat 103 Northfield House Friary Estate Peckham Park Road
Flat 53 Northfield House Friary Estate Peckham Park Road
Flat 101 Northfield House Friary Estate Peckham Park Road
Flat 8 Northfield House Friary Estate Peckham Park Road
Flat 9 Northfield House Friary Estate Peckham Park Road
Flat 100 Northfield House Friary Estate Peckham Park Road
616 Old Kent Road London SE15 1JB
622 Old Kent Road London SE15 1JB
624 Old Kent Road London SE15 1JB
614 Old Kent Road London SE15 1JB
1 Canal Grove London SE15 1LB
Unit 5 Sandgate Trading Estate Sandgate Street
596-598 Old Kent Road London SE15 1JB
628 Old Kent Road London SE15 1JB

20-26 Sandgate Street London SE15 1LE
634 Old Kent Road London SE15 1JB
10-18 Sandgate Street London SE15 1LE
632 Old Kent Road London SE15 1JB
First Floor And Second Floor Flat 634 Old Kent Road London
591 Old Kent Road London SE15 1LA
Flat 7 Lynn House Friary Estate Green Hundred Road
Flat 8 Lynn House Friary Estate Green Hundred Road
Flat 9 Lynn House Friary Estate Green Hundred Road
Flat 6 Lynn House Friary Estate Green Hundred Road
Flat 30 Lynn House Friary Estate Green Hundred Road
Flat 4 Lynn House Friary Estate Green Hundred Road
Flat 5 Lynn House Friary Estate Green Hundred Road
10 Canal Grove London SE15 1LB
15 Canal Grove London SE15 1LB
16 Canal Grove London SE15 1LB
17 Canal Grove London SE15 1LB
14 Canal Grove London SE15 1LB
11 Canal Grove London SE15 1LB
12 Canal Grove London SE15 1LB
13 Canal Grove London SE15 1LB
626 Old Kent Road London SE15 1JB
Flat 1 Northfield House Friary Estate Peckham Park Road
46 Cardiff House Friary Estate Peckham Park Road London
47 Cardiff House Friary Estate Peckham Park Road London
62 Cardiff House Friary Estate Peckham Park Road London
63 Cardiff House Friary Estate Peckham Park Road London
64 Cardiff House Friary Estate Peckham Park Road London
69 Cardiff House Friary Estate Peckham Park Road London
Flat 79 Northfield House Friary Estate Peckham Park Road
Flat 99 Northfield House Friary Estate Peckham Park Road
27 Cardiff House Friary Estate Peckham Park Road London
28 Cardiff House Friary Estate Peckham Park Road London
Flat 10 Northfield House Friary Estate Peckham Park Road
Flat 11 Northfield House Friary Estate Peckham Park Road
8 Peckham Park Road London SE15 6TW
18 Peckham Park Road London SE15 6TW
20 Peckham Park Road London SE15 6TW
22 Peckham Park Road London SE15 6TW
Flat 12 Northfield House Friary Estate Peckham Park Road
Flat 17 Northfield House Friary Estate Peckham Park Road
Flat 18 Northfield House Friary Estate Peckham Park Road
Flat 19 Northfield House Friary Estate Peckham Park Road
Flat 16 Northfield House Friary Estate Peckham Park Road
Flat 13 Northfield House Friary Estate Peckham Park Road
Flat 14 Northfield House Friary Estate Peckham Park Road
Flat 15 Northfield House Friary Estate Peckham Park Road
13 Peckham Park Road London SE15 6TR
15 Peckham Park Road London SE15 6TR
17 Peckham Park Road London SE15 6TR
11 Peckham Park Road London SE15 6TR

589 Old Kent Road London SE15 1LA
36B Ethnard Road London SE15 1RU
1 Peckham Park Road London SE15 6TR
12 Peckham Park Road London SE15 6TW
14 Peckham Park Road London SE15 6TW
16 Peckham Park Road London SE15 6TW
10 Peckham Park Road London SE15 6TW
21 Peckham Park Road London SE15 6TR
5 Peckham Park Road London SE15 6TR
7 Peckham Park Road London SE15 6TR
Hanover Park House 14-16 Hanover Park Peckham
50 Cardiff House Friary Estate Peckham Park Road London
51 Cardiff House Friary Estate Peckham Park Road London
52 Cardiff House Friary Estate Peckham Park Road London
49 Cardiff House Friary Estate Peckham Park Road London
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42 Cardiff House Friary Estate Peckham Park Road London
8 Cardiff House Friary Estate Peckham Park Road London
9 Cardiff House Friary Estate Peckham Park Road London
41 Cardiff House Friary Estate Peckham Park Road London
61 Cardiff House Friary Estate Peckham Park Road London
2 Livesey Place London SE15 6SL
24 Peckham Park Road London SE15 6TW
4 Verney Road London SE16 3DH
3 Peckham Park Road London SE15 6TR
9 Peckham Park Road London SE15 6TR
20A Ethnard Road London SE15 1RU
First Floor And Second Floor Flat 620 Old Kent Road London
First Floor And Second Floor Flat 624 Old Kent Road London
First Floor Flat 30 Ethnard Road London
628A Old Kent Road London SE15 1JB
20B Ethnard Road London SE15 1RU

632A Old Kent Road London SE15 1JB
21A Peckham Park Road London SE15 6TR
66 Cardiff House Friary Estate Peckham Park Road London
67 Cardiff House Friary Estate Peckham Park Road London
68 Cardiff House Friary Estate Peckham Park Road London
65 Cardiff House Friary Estate Peckham Park Road London
74 Cardiff House Friary Estate Peckham Park Road London
75 Cardiff House Friary Estate Peckham Park Road London
1A Peckham Park Road London SE15 6TR
73 Cardiff House Friary Estate Peckham Park Road London
70 Cardiff House Friary Estate Peckham Park Road London
71 Cardiff House Friary Estate Peckham Park Road London
72 Cardiff House Friary Estate Peckham Park Road London
Flat 88 Northfield House Friary Estate Peckham Park Road
Flat 89 Northfield House Friary Estate Peckham Park Road
Flat 90 Northfield House Friary Estate Peckham Park Road
Flat 87 Northfield House Friary Estate Peckham Park Road
Flat 84 Northfield House Friary Estate Peckham Park Road
Flat 85 Northfield House Friary Estate Peckham Park Road
Flat 86 Northfield House Friary Estate Peckham Park Road
Flat 91 Northfield House Friary Estate Peckham Park Road
Flat 96 Northfield House Friary Estate Peckham Park Road
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Flat 76 Northfield House Friary Estate Peckham Park Road
Flat 81 Northfield House Friary Estate Peckham Park Road
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29 Cardiff House Friary Estate Peckham Park Road London
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36 Cardiff House Friary Estate Peckham Park Road London

4 Reading House Friary Estate Green Hundred Road London
5 Reading House Friary Estate Green Hundred Road London
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38 Reading House Friary Estate Green Hundred Road London
35 Reading House Friary Estate Green Hundred Road London
36 Reading House Friary Estate Green Hundred Road London
37 Reading House Friary Estate Green Hundred Road London
7 Reading House Friary Estate Green Hundred Road London
9A Exeter House Friary Estate Friary Road London
8 Reading House Friary Estate Green Hundred Road London
9A Reading House Friary Estate Green Hundred Road London
9 Reading House Friary Estate Green Hundred Road London
26 Reading House Friary Estate Green Hundred Road London
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29 Reading House Friary Estate Green Hundred Road London
32 Reading House Friary Estate Green Hundred Road London
34 Reading House Friary Estate Green Hundred Road London
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30A Reading House Friary Estate Green Hundred Road London
30 Reading House Friary Estate Green Hundred Road London
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17 Exeter House Friary Estate Friary Road London
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19 Exeter House Friary Estate Friary Road London
16 Exeter House Friary Estate Friary Road London
13 Exeter House Friary Estate Friary Road London
14 Exeter House Friary Estate Friary Road London
15 Exeter House Friary Estate Friary Road London
Flat B 612 Old Kent Road London
Ground Floor Flat 30 Ethnard Road London
Rear 7 Peckham Park Road London
Flat A 612 Old Kent Road London
16A Peckham Park Road London SE15 6TW
First Floor Flat 18 Peckham Park Road London
First Floor Flat 11 Peckham Park Road London
9B Peckham Park Road London SE15 6TR
Ground Floor 8 Peckham Park Road London
Ground Floor 10 Peckham Park Road London
High Way Depot Peckham Park Road London
Rear of 636 Old Kent Road London
Second Floor Flat 11 Peckham Park Road London
13-14 Frensham Street London SE15 6TH

Western Wharf Livesey Place London
2 Exeter House Friary Estate Friary Road London
20 Lewes House Friary Estate Green Hundred Road London
21 Lewes House Friary Estate Green Hundred Road London
22 Lewes House Friary Estate Green Hundred Road London
2 Lewes House Friary Estate Green Hundred Road London
17 Lewes House Friary Estate Green Hundred Road London
18 Lewes House Friary Estate Green Hundred Road London
19 Lewes House Friary Estate Green Hundred Road London
23 Lewes House Friary Estate Green Hundred Road London
28 Lewes House Friary Estate Green Hundred Road London
29 Lewes House Friary Estate Green Hundred Road London
3 Lewes House Friary Estate Green Hundred Road London

Re-consultation: 04/06/2019

Appendix 2: Consultation responses received

Internal services

Economic Development Team

Statutory and non-statutory organisations

Arqiva - digital communications
Arqiva, Winchester Court
Environment Agency
Health & Safety Executive
London Underground Limited
Metropolitan Police Service (Designing out Crime)
National Air Traffic Safeguarding Office
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)
UK Power

Neighbour and local groups consulted:

Email representation
Flat C 616 Old Kent Road SE15 1JB
Flat 89 Northfield House Friary Estate SE15 6TN
Flat 92 Northfield House Friary Estate SE15 6TN
27 Reading House Friary Estate Green Hundred Road SE15 1RS
36 Reading House Friary Estate Green Hundred Road SE15 1RS
38 Reading House Friary Estate Green Hundred Road SE15 1RS
38 Reading House Friary Estate Green Hundred Road SE15 1RS
44 Aylesbury House Friary Estate SE15 1RW