

CONTENTS

RECOMMENDATION	2
EXECUTIVE SUMMARY	2
Site location and description	3
Details of proposal	5
Planning history	7
Planning history of adjoining sites	7
Summary of consultation responses	8
KEY ISSUES FOR CONSIDERATION	9
Summary of main issues	9
Adopted planning policy	10
Emerging planning policy	13
Principle in terms of land use, including consideration of emerging policy for the Old Kent Road Opportunity Area	14
Environmental impact assessment	18
Affordable housing	18
Housing Mix	19
Conclusions on outdoor amenity space, children's play space and public open space	26
Impact of proposed development on amenity of adjoining occupiers and surrounding area	27
Impact of adjoining and nearby uses on occupiers and users of proposed development	32
Transport issues	32
Design issues	35
Impact on character and setting of a listed building and/or conservation area	37
Impact on trees	38
Planning obligations (S.106 undertaking or agreement)	38
Sustainable development implications	39
Other matters	41
Conclusion on planning issues	42
Consultations	42
Consultation replies	42
Community impact statement / Equalities Assessment	43
Human rights implications	44

Item No. 6.2	Classification: Open	Date: 12 November 2019	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 18/AP/2895 for: Full Planning Application Address: 2 VARCOE ROAD, LONDON SE16 3DG Proposal: Demolition of existing buildings and erection of a new mixed use development comprising a part 7, part 9 storey (maximum height above ground of 29.99m) building of 288sqm commercial floor space (Use Class B1) and 74 residential dwellings (Use Class C3) with associated bin stores, cycle stores, plant rooms and hard and soft landscaping.		
Ward(s) or groups affected:	Old Kent Road		
From:	Director of Planning		
Application Start Date 19/09/2018		Application Expiry Date 19/12/2018	
Earliest Decision Date 28/10/2018			

RECOMMENDATION

1. That the planning committee grant planning permission, subject to:
 - a) Conditions and the applicant entering into an appropriate legal agreement by no later than 12 February 2020.
 - b) In the event that the requirements of (a) are not met by 12 February 2020. that the director of planning be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 191 of this report.

EXECUTIVE SUMMARY

2. This major application seeks to redevelop an existing industrial yard and storage building on the south eastern side of Varcoe Road to provide a mixed-use commercial and residential development of 74 units and 288sqm of B1 commercial floorspace. The scheme is located in a Strategic Preferred Industrial Location and would represent a departure from policy by virtue of proposing the introduction of residential accommodation to a Preferred Industrial Location.
3. The applicant has committed to providing 35.1% affordable housing by habitable rooms which equates to 24 affordable units, with a proposed tenure split of approximately 25% social rented and 10% intermediate by habitable rooms. There would be the potential for uplift in jobs on the site through the re-provision of good quality commercial space that

would be more compatible with the neighbouring uses, which comprise residential to the north and east of the site.

4. The proposed building is part 7/part 9 storeys and would be of a high quality design and deliver the master-planning and aspirations of the draft Old Kent Road Area Action Plan. The ground floor provides an active frontage.
5. The proposed development would have limited impacts on neighbouring properties in terms of privacy and outlook. Daylight and sunlight impacts are not considered to be so adverse to significantly impact on the amenity of neighbouring residents.
6. The proposed units would have good standard residential accommodation with appropriate mitigation measures to ensure noise levels internally are met as well as ensuring noise complaints against future commercial occupiers are minimised.
7. The proposal would be car free and future occupiers would be prevented from obtaining parking permits on the surrounding streets should a controlled parking zone be introduced. A s106 contribution would be required to improve local bus infrastructure.
8. The proposal would incorporate measures to reduce its carbon dioxide emissions, and a contribution to the council's Carbon Off-set Green Fund would be secured through a s106 agreement. Conditions are recommended to ensure that ground contamination, surface water drainage, archaeology and ecology would be adequately dealt with.
9. Overall, the clear benefits of the proposal are considered to outweigh the limited harm caused, and it is recommended that planning permission be granted, subject to conditions and a s106 agreement.

Site location and description

10. The application site currently comprises an industrial yard and storage building (B8 Class use). The existing building is a single storey pitched roof brick shed with access from Varcoe Road. The whole site measures 0.12 hectares.
11. It falls within a mixed residential and industrial area. Immediately to the west of the site is an industrial yard with associated buildings, yard and car parking (occupied by the T Marchant Industrial Estate). To the east of the site are two blocks of flats, known as Crown Place. To the north of the site was a former service station (1 Varcoe Road) which had a building and an open yard used for vehicle storage whilst they await repair, but planning permission was recently granted (under ref 16/AP/5235 dated 28/09/2017) for a 6 to 8 storey residential building with commercial and retail at ground floor. Upon site visit, this development has been implemented and still under construction.
12. The south part of the site was historically part of the Surrey Canal. Further south of the site is Southwark's Integrated Waste Management Facility (IWMF) and the New Cross Electricity Substation.
13. The site is within the following policy designations:

Urban Density Zone
Preferred Industrial Location (Strategic)

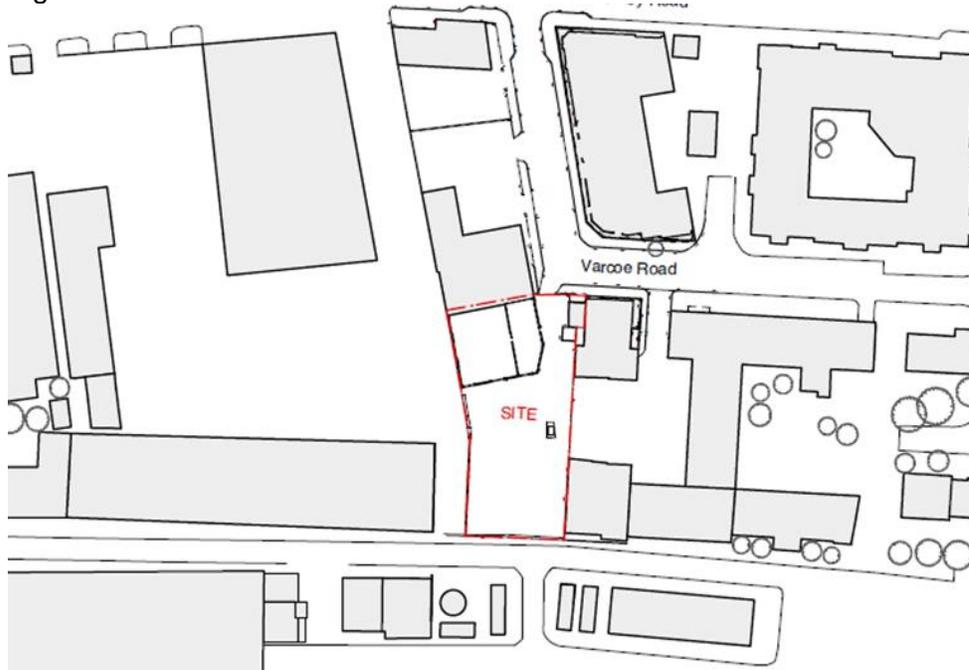
Air Quality Management Area (AQMA)
Bermondsey Lake Archaeological Priority Zone (APZ)

14. The site is also within the Old Kent Road Opportunity Area: Sub Area 3 – Sandgate Street and Verney Road (specifically OKR13). The site also falls within a Site Allocation (NSP67) outlined in the emerging New Southwark Plan.
15. The site is also within the adopted London Plan's Strategic Industrial Land (SIL).
16. The site is not within a conservation area and buildings are not listed. There are no nearby heritage assets in its immediate setting. The Grade II listed gasholder to the south is not within immediate views of this application site. The site has an official PTAL rating of 1b and is also within Flood Zone 3.

Figure 1: Aerial view of the site



Figure 2: The site



Details of proposal

- 17. The application has been amended following discussions with the applicant. It is now proposed to demolish the existing building and redevelop the site to provide a part 7, part 9 storey building (max 29.99m high) to accommodate 288sqm commercial floor space (Use Class B1) and 74 residential dwellings (Use Class C3) with associated bin stores, cycle stores, plant rooms and hard and soft landscaping.

Table: The mix of dwellings are as follows:

	Number of units	Percentage (%)
1 bedroom unit	37	50
2 bedroom unit	34	45.9
3 bedroom unit	3	4.1
Total	74	100

- 18. The height of the building has been reduced so that the total maximum height of the building would be 29.99m from the finished ground level. There was a basement proposed, which has now been omitted from the proposal.
- 19. Private amenity space is provided in the form of balconies and a communal garden and play space on the 7th floor for all tenures.
- 20. The scheme shall deliver 24 units as affordable housing to meet local housing needs, which represents 35.1% of all habitable rooms and 32.4% of all residential units as affordable. There shall be 17x social rented and 7x intermediate units which are accessed from the core in the northern part of the site with the private units accessed from the southern core.

21. Access to the commercial and residential uses would be from Varcoe Road, each with individual entrances, circulation space and cycle storage. The pick-up and drop-off area provided at the north eastern corner of the site off Varcoe Road allows for servicing to take place off-street and turn around within the development site to leave in forward gear. Refuse storage are proposed on the ground floor and collection will take place from the double yellow lines located in the immediate vicinity of the site access, off Varcoe Road.



Figure 3: CGI of development looking from the north west including adjoining development at 1 Varcoe Road.



Figure 4: CGI of development looking from the east including adjoining development 1 Varcoe Road.

Planning history

22. There is no relevant planning history on the site.

Planning history of adjoining sites

23. The most recent and relevant history on adjoining sites are at 1 Varcoe Road:

Ref 16/AP/5235 Planning permission granted 28/09/2017

Demolition of existing building and development comprising a part six, part 7 and part eight storey building to accommodate 57 new affordable residential units (Use Class C3) and provision of flexible employment / retail space on ground floor (Use Class B1, A1-A3).

Ref 18/AP/1535 Planning permission granted 26/07/2018

Non-material amendments to planning permission 16-AP-5235 for 'Demolition of existing building and development comprising a part six, part 7 and part eight storey building to accommodate 57 new affordable residential units (Use Class C3) and provision of flexible employment / retail space on ground floor (Use Class B1, A1-A3).' consisting of:

- a) Adjustment to the finished floor levels resulting in the overall building height increasing by 2 bricks.
- b) Enclosure of communal resident space by fire-rated partitions;
- c) Change two lower internal communal spaces from a triple storey stair and single storey communal room to a double storey stair and communal room; fenestration to west elevation amended accordingly.
- d) Internal layout of ground floor plant spaces reconfigured to accommodate further structural and services coordination.
- e) Internal layout of ground floor commercial spaces reconfigured to accommodate further structural and services coordination.
- f) Reconfiguration of ground floor fenestration to west elevation (rear light well) to accommodate new windows to the commercial space and adjacent louvers to plant areas adjusted following further services coordination.
- g) Podium terrace landscape updated with planters and furniture.
- h) Internal plan for Unit Type B amended following fire strategy update and further coordination with structure and services.
- i) Internal plan for Unit Type C (wheelchair housing unit) amended following fire strategy update and further coordination with structure and services.
- j) Layout of 6th and 7th floor rooftop amenity spaces amended to accommodate landscaping; planters and benches added, footprint of brick piers increased and aluminium cladding removed from rear of the terrace and replaced with brick.
- k) Boiler flue heights adjusted on roof.
- l) Size of window to top of stairs adjusted due to further structural and services coordination.
- m) Layout of high level roofs adjusted due to further services coordination.
- n) Addition of ground floor PPC mild steel gate at the end of the east elevation to control access to the rear of the building from the street.
- o) Refinement of the reconstituted stone façade profiles to coordinate with the brick coursing.

Ref 19/AP/1993 Planning permission granted 01/08/2019

Non-material amendment to planning permission 16/AP/5235 (Demolition of existing building and development comprising a part six, part 7 and part eight storey building to accommodate 57 new affordable residential units (Use Class C3) and provision of flexible employment / retail space on ground floor [Use Class B1, A1-A3]) for the following changes:

- Minor adjustment to the location of opening doors for the employment/ retail space on ground floor;
- Double doors along the rear elevation on the ground have been changed to single doors;
- Double door to bin store has been changed to single opening door and fixed panel;
- Change of the opening direction of the door into the escape stair on floor 1 to 5;
- Bathrooms in two of the dwellings have been adjusted to achieve a Building Regulations M4(3) compliant lay out; and
- Minor adjustments to the smoke shaft system with as a result the fans from the northern shaft being located on the roof.

Other permissions have been granted to discharge the conditions and s106 obligations of planning permission 16/AP/5235.

4-28 Varcoe Road (also known as Crown Place)

The most relevant planning history for this site is:

Ref 07/AP/2375 Planning permission granted 06/02/2008

Re-development of existing site with two blocks of part five / part six storeys comprising one commercial unit on the ground floor, and 18 self contained flats on upper floors with associated car parking and cycle storage.

There are other decisions relating to the amendments of the above planning permission.

Sumner Works, 76-78 Verney Road (also now known as Batwa House)

Ref 03/AP/1278 Planning permission granted 01/11/2004

Redevelopment of site to provide 45 residential units (comprising 8x1 bed, 31x2 bed and 5x3 bed flats) in a block of part three/ part six storeys together with associated car parking (14 spaces) and amenity space.

Ref 05/AP/2118 Planning permission granted 21/12/2006

Redevelopment of site to provide 45 residential units (comprising of 10 x 1 bed, 28 x 2 bed, 1 x 2 bed (wheelchair), 6 x 3 bed flats) in a block of part 3/part 6 storeys together with parking. Resubmission. Amendments to approved development 03-AP-1278 including a reduction in on-site car parking from 14 spaces to 13 spaces, modifications to elevational treatment and minor changes to the roof and window fenestration and alterations to the dwelling mix.

Summary of consultation responses

24. At the time of writing, a total of 2 neighbour responses have been received. The objections raised by the residents are summarised below:
- Concerns over the lack of car parking on site given the car free scheme approved to the north. Currently there is one access road which already presents parking difficulties and access to buildings.
 - Consideration of the height of the buildings and its compliance with the Area Action

Plan.

- Concern that there may be loss of light to Batwa House and Crown Place apartments and the two adjacent blocks.
- No provision of jobs which is envisaged in the Area Action Plan.
- Unaffordable high rise developments and would not meet the need for housing in London. The development should be in line with the Area Action Plan.
- Neighbours have not received postal notification of this application.
- Suggest that planting is required to the northern edge of the roof terrace in order to provide screening and prevent overlooking of the roof garden of 1 Varcoe Road which is currently in construction.

Officer response:

- 25.
- The site has a PTAL of 3 (under the manual assessment of the PTAL rating). The applicant has demonstrated in their Transport Assessment that there would not be any impact on the local highway network. This is further discussed in the Transport section of the report.
 - The height of the building at a maximum 9 storeys is considered to be appropriate given the changing townscape of the Old Kent Area. It is not considered to be excessive given the consented scheme immediately to the north and the immediate area is generally between 6 to 8 storeys.
 - Following review of the submitted daylight and sunlight assessment, there would be impacts on the neighbouring buildings, but it is not considered to be of a level that would significantly impact on the neighbours' amenity.
 - The proposed commercial unit on the ground floor would provide a greater employment density than the existing scaffolding yard.
 - A policy compliant of at least 35% affordable housing (based on habitable rooms) is proposed.
 - Letters sent to local residents, the display of a site notice and a notice in the local press has been undertaken and this satisfies consultation requirements by the Local Planning Authority.
 - Details of the communal rooftop amenity space will be secured by condition and the northern boundary could have appropriate planting or other treatment to limit any overlooking onto 1 Varcoe Road.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

26. The main issues to be considered in respect of this application are:
- Principle in terms of land use, including consideration of emerging policy for the Old Kent Road Opportunity Area;
 - Environmental impact assessment;
 - Provision of commercial space
 - Affordable housing;
 - Design issues, including height, scale and massing;
 - Housing mix;
 - Quality of accommodation;
 - Impact upon the amenity of neighbouring residential and commercial occupiers and

- the surrounding area;
- Transport issues;
- Ecology
- Planning obligations (Section 106 Undertaking or Agreement);
- Sustainable development implications;
- Other matters.

Adopted planning policy

National Planning Policy Framework (NPPF)

27. 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.
28. Paragraph 215 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.
29. Chapter 2 Achieving sustainable development
Chapter 5 Delivering a sufficient supply of homes
Chapter 6 Building a strong, competitive economy]
Chapter 8 Promoting healthy and safe communities
Chapter 9 Promoting sustainable transport
Chapter 11 Making effective use of land
Chapter 12 Achieving well-designed places
Chapter 14 Meeting the challenge of climate change, flooding and coastal change
Chapter 15 Conserving and enhancing the natural environment
Chapter 16 Conserving and enhancing the historic environment

London Plan 2016

30. The London Plan is the regional planning framework and was adopted in 2016. The relevant policies of the London Plan 2016 are:
31. Policy 2.17 Strategic Industrial locations
Policy 3.3 Increasing housing supply
Policy 3.5 Quality and design of housing developments
Policy 3.6 Children and young people's play and informal recreation facilities
Policy 3.8 Housing choice
Policy 3.9 Mixed and balanced communities
Policy 3.10 Definition of affordable housing
Policy 3.11 Affordable housing targets
Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes
Policy 3.13 Affordable housing thresholds
Policy 4.3 Mixed use development and offices
Policy 4.4 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

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

Core Strategy 2011

34. 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:
35. Strategic policy 1 - Sustainable development
 Strategic policy 2 - Sustainable transport
 Strategic policy 5 - Providing new homes
 Strategic policy 6 - Homes for people on different incomes
 Strategic policy 7 - Family homes
 Strategic policy 10 - Jobs and businesses
 Strategic policy 11 - Open spaces and wildlife
 Strategic policy 12 - Design and conservation
 Strategic policy 13 - High environmental standards
 Strategic policy 14 - Implementation and delivery

Southwark Plan 2007 (saved policies)

36. 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:
37. 1.1 - Access to employment opportunities
 1.2 - Strategic and local preferred industrial locations
 1.5 - Small businesses
 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
 3.19 - Archaeology
 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

Council's Supplementary Planning Document (SPD)

38. Sustainable design and construction SPD (2009)
 Sustainability assessments SPD (2009)
 Sustainable Transport SPD (2010)
 Affordable housing SPD (2008 - Adopted and 2011 - Draft)
 Residential Design Standards SPD (2015)
 Section 106 Planning Obligations and Community Infrastructure Levy (2015)
 Development Viability SPD (2016)
- Greater London Authority Supplementary Guidance
39. Housing SPG (2016)
 Providing for Children and Young People's Play and Informal Recreation (2008)
 Use of planning obligations in the funding of Crossrail (2010)
 Affordable Housing and Viability SPG (2017)

Emerging planning policy

Draft New London Plan

40. The draft New London Plan was published on 30 November 2017 and the first and only stage of consultation closed on 2 March 2018. Minor suggested changes to the plan were published on 13 August 2018 and an Examination in Public (EIP) began on 15 January 2019. Further suggested changes to the Plan have been proposed by the Mayor and published in response to the EIP Panel of Inspector's matters at the examination sessions. The EIP continued until May 2019 and until the London Plan reaches formal adoption it can only be attributed limited weight. The draft New London Plan identifies the Old Kent Road as having a minimum capacity for housing of 12,000 and a jobs target of 5,000, which increases the capacity of the adopted London Plan of 2,500 homes and 1,000 jobs.

Old Kent Road Area Action Plan (OKR AAP)

41. The council is preparing an Area Action Plan/Opportunity Area Planning Framework for Old Kent Road (AAP/OAPF) which proposes significant transformation of the Old Kent Road area over the next 20 years, including the extension of the Bakerloo Line with new stations along the Old Kent Road towards New Cross and Lewisham. Consultation has been underway for 3 years, with a first draft published in 2016. A further preferred option of the Old Kent Road AAP (Regulation 18) was published in December 2017 and concluded consultation on 21 March 2018. As the document is still in draft form, it can only be attributed very limited weight.
42. Whilst acknowledging this very limited weight, members are advised that the draft OKR AAP places the application site within the proposed Action Area Core, and within proposal site OKR 13 which covers the Sandgate Street, Verney Road and Old Kent road (South) area. Requirements for this allocation site include replacement of existing employment floor space and provision of housing.

New Southwark Plan

43. For the last 5 years the council has been preparing the New Southwark Plan (NSP) which will replace the saved policies of the 2007 Southwark Plan and the 2011 Core Strategy. The council concluded consultation on the Proposed Submission version (Regulation 19) on 27 February 2018. It is anticipated that the plan will be adopted in 2019 following an Examination in Public (EIP). Similarly with the OKR AAP, 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.
44. The site is within the part of the site allocation NSP67 'Sandgate Street and Verney Road'. The vision for this area is for new homes (Class C3), retail (Classes A1-A4 on the Old Kent Road frontage, community uses (Class D), employment (Class B uses), community uses (Class D) and public open space including Surrey Canal Linear Park.

Principle in terms of land use, including consideration of emerging policy for the Old Kent Road Opportunity Area

45. The site is located in the Core Strategy's Preferred Industrial Location-Strategic (SPIL) and also within the London Plan's Strategic Industrial Location (SIL) which is an industrial location of strategic importance as identified in the Core Strategy and the London Plan. Introducing housing here would therefore represent a departure from the adopted Southwark and London Plan.
46. Strategic policy 10 of the Core Strategy states that the SPIL will be protected for industrial and warehousing uses. The Core Strategy does, however, recognise that structural changes in the economy are resulting in a declining need for industrial land in London. The Core Strategy also recognises that diversifying the range of job opportunities in the industrial locations into new sectors would benefit local people. Further, it sets out the future direction of Old Kent Road as a growth and regeneration action area, subject to a future area action plan (AAP).
47. Saved Southwark Plan policy 1.2 states that the only developments that will be permitted in SPILs are B class uses and other sui generis uses which are inappropriate in residential areas.
48. Adopted London Plan policy 2.17 seeks to promote, manage and where appropriate, protect the Strategic Industrial Land as London's main reservoir of industrial and related capacity, which includes general and light industrial uses. It states that developments on Strategic Industrial Land 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.
49. The London Plan 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, which has been increased to a minimum of 12,000 in the emerging London Plan. It identifies 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 Strategic Industrial Location.

The Old Kent Road Area Action Plan (OKR AAP)

50. The emerging OKR AAP sets targets of a total of 20,000 new homes and 10,000 new jobs as well as new infrastructure, including parks and schools. It proposes the release of a substantial part of the Preferred Industrial Location designation to allow for the creation of mixed use neighbourhoods, so that new and existing businesses are designed to co-exist with new homes.
51. The emerging AAP contains proposals for an innovative mix of industrial and residential uses in a detailed master planning approach across the Opportunity area, including phased rationalisation of and proposed new sites for SIL. While the draft new London Plan and OKR AAP currently have limited or very limited weight in planning decisions, it is important to note the future strategic direction envisaged for the Old Kent Road in the adopted London Plan as further policy is being developed in line with the aspirations of Southwark Council and the Mayor for the designated opportunity area.

52. As stated above, the OKR AAP places the site within the proposed Action Area Core, and within proposal site OKR 13 which covers the Sandgate and Verney Road area.
53. Emerging policy AAP6 of the OKR AAP states that development must retain or increase the amount of B Class floorspace on site, accommodate existing businesses on site or in the wider Old Kent Road Opportunity Area or provide relocation options for businesses that would be displaced by redevelopment and result in an increase in the number of jobs provided. It also requires the workspace to be managed by a specialist provider and for an element of affordable workspace to be provided.
54. Paragraph 48 of the NPPF 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 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.
55. It is noted that the Draft London Plan Policy E5 confirms that non SIL uses within SIL should be refused unless there has been a strategically co-ordinated process of SIL consolidation carried out through a planning framework or Development Plan document review process (and adopted as policy in a Development Plan), or as part of a co-ordinated masterplanning process in collaboration with the GLA.
56. The OKR AAP and New Southwark Plan proposes the release of significant areas of OKR SIL and would have resulted in the loss of much important industrial capacity within the OKR AAP area. However, these concerns have subsequently been addressed with the GLA and the council agreeing an approach to phasing the release of protected industrial land for mixed use development in the Old Kent Road Opportunity Area.
57. Although the proposed development is on SIL, given the coordinated approach to the managed release of industrial land set out above, the proposed land uses are considered appropriate in strategic planning terms and generally comply with London Plan Policies. Members should, however, note that even with this agreement in place the draft OKR AAP and New Southwark Plan (NSP) would still need to be subject to an Examination in Public (EiP) and the Secretary of State's approval before they become the adopted development plan position.
58. The site area is 0.12 hectares and currently accommodates 275sqm of existing industrial floorspace within a warehouse building. The remainder of the site is an open yard for scaffolds. The scheme had originally proposed residential on the ground floor, but following discussions with the applicant, this has been omitted and the central part of the ground floor would now provide 288sqm of B class floorspace, a slight increase over the existing provision.
59. Notwithstanding the above, in determining whether the principle of the proposed development would be acceptable in land use terms, specifically the introduction of housing in the SPIL, Members need to consider whether the wider regeneration benefits of the scheme would outweigh any harm caused, and whether those benefits would therefore justify a departure from the adopted planning policy.
60. Officers consider that the key benefits arising from the proposal would be as follows.

Regeneration of industrial areas

61. There is a need for the borough to balance the protection and enhancement of industrial sites with the delivery of other aspirations and requirements, including increasing housing provision.
62. It has been identified that future employment uses in the old Kent Road will require a mixture of spaces suitable for a broad mix of uses, including small to medium logistics, light industrial, small office and co-working space, which should be provided in a mixture of building typologies that should be well adapted with good servicing provision with access to upper floors and fit out.

Employment floorspace

63. As explained above, there would now be the provision of employment use on the ground floor level. This would be an enhanced B class space and would potentially increase the number of jobs created on the site. It has been calculated that a range of 6 to 24 Full-time Equivalent (FTE) jobs for managed workspace could be provided with the proposal over the potential 4 FTE jobs that a retained storage and distribution space could support. To meet the policy requirements and to improve the likelihood of B1(c) occupiers leasing the units, it is recommended that the internal B1(c) fit out of the proposed commercial units would be secured through condition and a clause in the Section 106 Agreement. The space will be conditioned to be used for B1(c) use only.

Business relocation and retention

64. The existing business and operation on the site is for a scaffolding company. It is understood that the company has been operating on the site since the 1960s and over time the business has grown and operations have been migrated to much larger sites in London. The site has therefore been made largely redundant and has been used as excess storage. It is therefore considered that there are no issues in respect of business relocation and retention.

Job creation

65. The proposed enhanced commercial floor space would result in an increase in both the number and quality of jobs when compared with the existing operations on site and is a positive aspect of the proposal as explained above.

Affordable workspace

66. The applicant has agreed to provide an element of affordable workspace within the scheme comprising 10% of the commercial floorspace. The applicant has agreed the rents to be at £11 per sqft over a 15 year period, which is considered appropriate and is marginally more than those levels that have been agreed on other sites in the Old Kent Road area. The applicant has accepted this level. The rents would be subject to inflation over this time. The level of rent would make the space affordable to creative industries and businesses and ensure businesses that require low rents have the opportunity to lease space within the area.

Specialist workspace provider

67. The employment space has been designed to be flexible so that it could accommodate a

range of different unit sizes and shared workspaces. Details of a specialist workspace provider could be secured through a s106 planning obligation.

Provision of housing, including affordable housing

68. The scheme would provide 24 new residential units, including policy compliant affordable housing comprising social rented and intermediate units in terms of habitable rooms. There is a pressing need for housing in the borough. The adopted London Plan (2016) requires the provision of a range of housing and sets the borough a target of 27,362 new homes between 2015 and 2025. This is reinforced through Strategic Policy 5 of the Core Strategy which requires development to meet the housing needs of people who want to live in Southwark and London by providing high quality new homes in attractive areas, particularly growth areas. It would also be in accordance with emerging policy for the Old Kent Road Opportunity Area and the expectation of significant new housing provision.

Impact of the proposed residential use

69. It is recognised that the introduction of residential units could restrict and prejudice the operation of existing businesses in the area. Given the changing nature of the uses now carried out within the area, it is not felt that these businesses would be prejudiced and they could continue to operate and co-exist with the introduction of new residential uses provided schemes are well designed for this mix. Residential accommodation within a mixed use context is already established within the immediate area. A residential development block is currently under construction at 1 Varcoe Road and to the east of the site are already established residential apartments. This mixed use development was considered to be a benefit to the area and the introduction of housing would not prejudice the operation of existing businesses of the area.

Prematurity

70. The most up to date development plan pertinent to the Old Kent Road area is the 2016 London Plan. This identifies the Old Kent Road Opportunity Area as having significant potential for housing lead growth. The AAP has been developed in response to this adopted plan and has also sought to address the emerging policy position of the draft New London Plan including the increased housing target for the opportunity area and the need to ensure that the New London Plan aspirations for industrial land and employment are addressed. This scheme is not considered to undermine either the strategic or local plan making process, and reflects the adopted statutory development plan position of the 2016 London plan and the direction of travel of the draft New Southwark Plan and the 2016 and 2017 draft AAPs and the 2018 draft New London Plan. It is not therefore considered to be premature.

Conclusion on land use

71. To conclude in relation to land uses, the proposed development 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 residential into the SPIL would represent a departure from the adopted development plan.
72. This must therefore be weighed against the benefits of the scheme which include:
- the provision of housing, of which 35.1% would be affordable;

- re-provision of enhanced commercial floorspace;
- the provision of good quality, flexible commercial space;
- job creation
- active frontage
- delivery of affordable workspace
- Optimised use of the site.

73. Some limited weight can be attached to the NSP and OKR AAP at present, given that they have been subject of extensive consultation and the emerging policies would support the proposal. Given the changing character of the area, it is not felt that the introduction of housing would prejudice the operation of existing businesses in the area. Job creation and new housing would be in accordance with the London Plan (2016) requirements for the Old Kent Road Opportunity Area. For these reasons, officers consider that the principle of the proposed development in land use terms should be supported in this instance.

Environmental impact assessment

74. The applicant did not make a screening request to determine whether an Environmental Impact Assessment (EIA) is required in respect of the proposed development due to the size and scale of the proposed scheme. The proposed development would not constitute EIA development and accordingly does not need to be supported by an Environmental Statement.

Affordable housing

75. Strategic Policy 6 of the Core Strategy 'Homes for People on Different Incomes' requires at least 35% of the residential units to be affordable. For developments of 15 or more units affordable housing is calculated as a percentage of the habitable rooms and further information on this can be found in the council's draft Affordable Housing SPD (2011). All of the affordable units should be provided on site and a mix of housing types and sizes is required. In accordance with Saved Policy 4.5 of the Southwark Plan, for every affordable housing unit which complies with the wheelchair design standards one less affordable habitable room will be required.

76. The Southwark Plan saved policy 4.4 requires at least 35% of all new housing as affordable housing. Of that 35%, there is a requirement for 50% social housing and 50% intermediate housing in the Old Kent Road Action Area. The adopted London Plan 2016 sets a strategic requirement of 60% social housing and 40% intermediate housing. The emerging NSP 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.

77. In total, 188 habitable rooms would be provided in the development. The development would provide a total of 66 affordable habitable rooms which would equate to an overall provision of 35.1%. The level of provision is therefore acceptable and policy compliant. Viability information has been submitted which supports the delivery of the quantum of affordable housing proposed. Consultants acting on behalf of the council have reviewed the assessment and concludes that the scheme is effectively in a breakeven position and is considered marginally viable on this basis.

78. A standard policy compliant 35% habitable rooms offer would equate to 65.8 affordable

habitable rooms, with 25% social rent at 47 habitable rooms, and 10% Intermediate at 18.8 habitable rooms.

79. The proposed 35.1% habitable rooms offered would have a split of 46 social rent habitable rooms (69.7%) and 10.6 Intermediate habitable rooms (30.3%) as seen in the table below. Whilst the above split falls short of the 71.5% social and 28.5 intermediate, this is only a very marginal deviation.

Table: Affordable mix

Number of bedrooms	Affordable tenure (habitable rooms)		Number of affordable units	Percentage (%)
	Social	Intermediate		
One bedroom	16	2	9	37.5
Two bedrooms	18	18	12	50
Three bedrooms	12	0	3	12.5
Total	46 (69.7%)	20 (30.3%)	24	100

80. Overall, the proposal would provide a total of 24 affordable units in a mix of unit sizes. A Section 106 agreement is recommended to secure the delivery of these units, including a clause preventing more than 50% of the private units from being occupied until the affordable units have been completed.
81. The affordable and private units each have their separate entrance, circulation and cores. The affordable is located in the northern section of the building (7 storeys), with the private units located in the southern element. The two tenures are separated by the ground floor commercial space.

Housing Mix

82. Core Strategy Strategic Policy 7, 'Family Homes', requires a housing mix of at least 60% dwellings with two or more bedrooms, with 20% having at least three bedrooms. No more than 5% of the units should be studios, and these can only be for private housing. This is reiterated in emerging policy in the draft OKR AAP and the NSP.
83. The proposed housing mix is summarised in the table:

Unit Type	Units	Percentage of total number of units
1 bed	37	50%
2 bed	34	45.9%
3 bed	3	4.1%
Total	74	100%

84. The proposal would also fall short of the above housing policy requirements with 50% of the dwellings having two or more bedrooms and 4% having three bedrooms. For the affordable housing however, the mix is much improved to the policy position, with 62.5% having two or more bedrooms and 12.5% having three bedrooms. This affordable mix is welcomed despite

the shortfall for the scheme overall, which reflects the challenge of planning a relatively narrow site, which is constrained by the developments that immediately adjoin it.

85. Officers consider that the wider benefits of the scheme including an improved affordable rent level for workspace outlined in this report would outweigh any harm caused by this shortfall in the housing mix.

Wheelchair accommodation

86. The London Plan Policy 3.8 requires 10% of new housing to be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. Saved Policy 4.3 of the Southwark Plan support this, requiring 10% of new dwellings to be suitable for wheelchair users, except where this is not possible due to the physical constraints of the site.
87. The applicant has confirmed that a total of 7 units would be wheelchair accessible. Following review of the scheme and discussions with the applicant, 3 of the units would be allocated as intermediate with the remaining 4 in the private tenure.

Density

88. Policy 3.4 Optimising Housing Potential of the London Plan 2016 states that development should optimise housing output for different types of location within the relevant density range shown in Table 3.2 of the Plan. It also requires local context, the design principles and public transport capacity to be taken into account. Strategic Policy 5 - Providing new homes of the Core Strategy sets out the density ranges that residential and mixed use developments would be expected to meet.
89. As the site is located within the Urban Zone, a density range of 200 to 700 habitable rooms per hectare (HR/Ha) 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 2015.
90. The development as a whole would have a density of approximately 1,633HR/Ha (including the commercial floorspace). Since the maximum upper limit of 700HR/Ha would be significantly exceeded, the development would need to demonstrate that it would be excellent in relation to housing and design quality. If it can be demonstrated that an excellent standard of accommodation would be provided, makes an exceptional contribution to the regeneration of the area, and the response to context and impact on amenity to existing occupiers is acceptable, then it is considered that the high density in this Opportunity Area location would not raise any issues to warrant withholding permission. There is a pressing need to optimise the use of land in London, particularly in Opportunity Areas. The proposal would result in a good standard of accommodation, with many of the 'exemplary' requirements of the Southwark Residential Design Standards SPD 2015 met. This is summarised in the table below with full assessment and commentary provided in other sections of the report.

Exemplary residential design criteria from Southwark Residential Design Standards SPD	Commentary
Provide for bulk storage	Each of the proposed units would provide for built in storage that would meet or exceed the standards set in the Residential Design SPD.
Exceed minimum privacy distances	Minimum privacy distances would be exceeded between habitable rooms. The development is designed to avoid direct overlooking.
Good sunlight and daylight standards	The majority of the units would have good sunlight and daylight standards achieved. This is further explained in this report.
Exceed minimum ceiling heights of 2.3m	All rooms within the proposed dwelling would exceed the minimum 2.6 metre ceiling height.
Exceed amenity space standards (both private and communal)	The amenity space proposed is set out in the subsequent section on outdoor amenity space, <i>Children's Play Space and Public Open Space</i> section of this report. Where the recommended 10 sqm private amenity space has not been met, the shortfall has been included as communal amenity space in line with the Residential Design Standards SPD.
Secure by Design certification	This scheme would achieve Secured by Design Accreditation. Conditions to require this are recommended
No more than 5% studio flats	No studio flats are proposed.
Maximise the potential of the site	The potential of this site would be maximised, delivering improved commercial floor space, new dwellings achieving an exemplary standard of design, outdoor space and play space, without compromising local visual or residential amenity.
Include a minimum 10% of units that are suitable for wheelchair users	10% of the proposed units would be suitable for wheelchair users.
Excellent accessibility within buildings	The accessibility within the buildings would be excellent.
Exceptional environmental performance	The development is capable of achieving BREEAM "excellent" upon fit out of the commercial units; a condition to this effect has been included. The development would need to make a £111,168 carbon off

	set payment contribution as the residential element is not capable of delivering zero carbon homes. The applicant has agreed to make the payment which makes this aspect of the scheme fully policy compliant.
Minimised of noise nuisance between flats through vertical stacking of similar room types	The plans submitted demonstrate that a very good level of stacking has been achieved where kitchens are stacked above kitchens and bedrooms over bedrooms. There are just some instances where this stacking would not be achieved where the floorplans change. However, these instances are few and the noise impact assessment demonstrates that the internal noise levels could be achieved and as such is considered to be acceptable. This is explained in further detail in this report.
Make a positive contribution to local context, character and communities	The proposed development would make a positive contribution to local context, character and communities in terms of its quality of design and regeneration benefits including affordable housing, workspace and investment in local transport and public space.
Include a predominance of dual aspects units	59% of the total units (43 units) proposed would be dual aspect. 71% of the affordable units would have dual aspect and 50% of the private units would have dual aspect.
Have natural light and ventilation in all kitchens and bathrooms	All kitchens would benefit from natural light and ventilation due to their open plan configuration. Bathrooms on the other hand would not achieve this as all bathrooms would be internalised but will benefit from mechanical ventilation.
At least 60% of units contain two or more bedrooms	The proposed development proposes that 50% of the total number of units across all tenures would have two or more bedrooms, falling short of the 60% requirement. The dwelling mix within the affordable tenure is however at 72.5%, which is a positive aspect of the proposal.
Significantly, exceed the minimum floor space standards	All units would meet the minimum space standards.
Minimise corridor lengths by having additional cores	No more than 6 flats per core is proposed, complying with the Mayor's Housing Design SPG which advises no more than 8 flats per core.

91. For the reasons detailed in the above paragraph and table, the higher density proposed would not compromise the quality of accommodation and the impacts of the development would be acceptable. It is therefore considered that the exceedance of the density threshold would not warrant withholding permission.

Quality of accommodation

92. Saved Policy 4.2 of the Southwark Plan advises that planning permission will be granted provided the proposal achieves good quality living conditions. The standards in relation to internal layout are set out in the adopted Residential Design Standards SPD 2015 and include guidance on overlooking standards as well as requiring the predominance of dual aspect accommodation. The above table summarised some elements of the design and how it is considered to be of exemplary standard. The following paragraphs discuss the internal daylight within the proposed residential units, overlooking issues, amenity space, child play space and noise implications.



Figure 5: Typical layout on upper floors

Internal daylight within the proposed residential units

93. A daylight and sunlight report based on the Building Research Establishment (BRE) Guidance has been submitted which considers daylight to the proposed dwellings using the Average Daylight Factor (ADF). ADF is a measure of the overall amount of diffuse daylight within a room. It is the average of the daylight factors across the working plane within a room. ADF determines the natural internal light or daylight appearance of a room and the BRE guidance

recommends an ADF of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens. This also adopts an ADF of 2% for shared open plan living room/kitchens/dining.

94. The submitted daylight and sunlight assessment provides two scenarios for the future internal daylight levels. Scenario one is based on the existing site situation, without the development of 1 Varcoe Road and with the existing warehouse building to the west on site (at T Marchants Estate). Scenario two is based on the future surrounding context with 1 Varcoe Road built and the warehouse to the west removed as per the OKRAAP.
95. The results indicate that 210 out of 217 (97%) rooms meet their target value for daylight in terms of ADF for their room use. In the future context, this would be 201 out of 217 (93%) rooms.
96. There are two bedrooms on the first floor (in the private units) that have a low ADF value in the existing context. However, when the development of the adjoining site to the west eventually comes forward, the existing warehouse located on the boundary is likely to be removed which would improve the daylight levels for these bedrooms.
97. Those rooms that do not meet in the future context are mainly the kitchens in the northern section of the building and immediately adjoin the development at 1 Varcoe Road. The ADF levels for these kitchens (2 kitchens on each floor) are very low. However, Officers agree that these kitchens are galley style kitchens where preparation of food is the main purpose and the living dining room is the main living space. The associated living/dining room to these units do have a good ADF value. It is considered that on balance, given that 93% of the rooms in the future context would meet the minimum ADF, this is acceptable.

Overlooking

98. The proposed building would sit to the west of Crown Place. The windows at Crown Place facing this site are not main living spaces. However, there are some habitable room windows and balconies further into this neighbouring site and are at perpendicular angle to the east elevation of the proposed building. In any case, the proposed building has been designed to limit any direct overlooking. Habitable room windows in the proposed building do not have direct line of site into those windows at Crown Place. There are protruding bays to some of the proposed rooms that allow for views out to the north and south and thereby limiting direct overlooking into the Crown Place flats.

Amenity and play space

99. All new residential development must provide an adequate amount of useable outdoor amenity space. The Residential Design Standards SPD sets out the required amenity space standards which can take the form of private gardens and balconies, shared terraces and roof gardens. Policy 3.6 of the London Plan requires new developments to make provision for play areas based on the expected child population of the development. Children's play areas should be provided at a rate of 10sqm per child bed space (covering a range of age groups). The emerging OKR AAP requires 5sqm of public open space per dwelling as per AAP 10.
100. The following amount of amenity space would need to be provided:
 - For units containing 3 or more bedrooms, 10sqm of private amenity space as required by the SPD;

- For units containing 2 bedrooms or less, ideally 10sqm of private amenity space, with the balance added to the communal space;
- 50sqm communal amenity space per block as required by the SPD;
- 10sqm of children's play space for every child space in the development as required by the London Plan;
- 5sqm of public open space per dwelling as required by the OKR AAP. If it is not feasible to deliver the open space on site, a financial contribution will be required.

Private amenity space

101. In this case, a total of 740sqm of private amenity space would need to be provided between the 74 units. In this instance 464sqm of private amenity space is proposed which is short of the required amount. Where the full recommended provision of 10sqm per residential unit has not been provided, the shortfall has been added to the communal requirement. A provision of 276sqm of communal amenity space, plus the minimum of 50sqm would have been required (a total of 326sqm). The applicant has proposed a roof amenity space that has a total area of 466sqm at level 7, which is accessed by both tenures and includes sitting areas and landscaping. However, as discussed below there is also the requirement to provide children's play space which is 187sqm and should be in addition to communal amenity space. The roof amenity area would be part communal and part children's play space. 187sqm of the 466sqm area would be dedicated to play space, leaving an area of 279sqm of communal amenity space. There would therefore be a shortfall of 47sqm of communal amenity space, which would require a financial contribution of £9,635 (£205 per sqm) and will be secured by Section 106 agreement. This would go towards creating the Verney Road linear park, as part of the OKRAAP masterplan.

Children's play space

102. In line with the Mayor's Providing for Children and Young People's Play and Informal Recreation SPG (using the June 2019 calculator) the development would be required to provide 187sqm of children's play space. Play space based on the New Southwark Plan calculations would be 156.4sqm.
103. Revised plans have been submitted to show 187sqm of play space within the communal amenity area, which meet this requirement.

Public Open Space

104. In addition to the existing amenity space requirements set out above, emerging Policy AAP10 of the draft OKR AAP requires the provision of 5sqm of public open space per dwelling or a financial contribution in lieu. This would equate to 370sqm of public open space for the scheme, but given the small area of the site and the development essentially occupying the whole area of the site, there is limited space available to provide public open space. It is also a no-through route and therefore limits its usability as a public open space.
105. The applicant has agreed to make the contribution of £75,850 based on the 74 dwellings proposed (at a cost of £205 per sqm as set out in the AAP) and can be secured by the legal agreement and can go towards the delivery of the Verney Road linear park.

Table 5 explaining the playspace and amenity space proposed against policy requirement:

	Policy requirement	Proposal	Difference
Communal	50sqm shortfall of 276sqm	279sqm (inclusive of the 276sqm shortfall in private amenity space provided as communal amenity space)	47sqm
Private	740sqm	464sqm	276sqm
Dedicated children's play space	187sqm required by the June 2019 GLA calculator	187sqm	0sqm

Conclusions on outdoor amenity space, children's play space and public open space

106. Sufficient outdoor space has been designated to meet the private amenity, communal amenity and children play space requirements of the Residential Design SPD and the Mayor's Providing for Children and Young People's Play and Informal Recreation SPG as outlined in the table above. Where this is not provided, off-set payments would be made.
107. In respect of the public open space as required by the draft AAP, and although the applicable policy of the OKR AAP currently has limited weight, a financial contribution in-lieu of providing such space on-site would be expected and will be secured through the Section 106 agreement.
108. All communal amenity space would be equally accessible to all tenures. Service charge costs to social rent tenants would be capped within social rent cap levels.

Noise

109. The site is located within the SPIL, and the proposed residential units would adjoin existing commercial units to the west and south, although these sites may come forward with similar mixed schemes. A noise impact assessment has therefore been undertaken to assess whether the site would be suitable for residential development.
110. The report has been reviewed by the council's Environmental Protection Team (EPT) and a condition to secure appropriate internal noise levels is recommended, which should minimise the likelihood of noise complaints against the existing industrial occupiers. Mitigation measures such as alternative ventilation for all habitable rooms and higher than standard specification glazing have been recommended by the applicants.
111. The rear balconies to the first and second floors are proposed as winter gardens which provides some protection from noise emitting from the neighbouring site.

Conclusion on quality of accommodation

112. The proposed development would provide generally well lit quality homes that meet the space requirements of the Residential Design Standards SPD. The units would have access to private amenity and communal amenity space and where this is not achieved a contribution is provided to offset the shortfall. Whilst a number of the units would be single aspect, these are not the family sized dwellings. Mitigation measures are proposed to ensure noise impacts from surrounding uses are limited.

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

113. Strategic Policy 13 of the Core Strategy 'High Environmental Standards' seeks to ensure that development sets high standards for reducing air, land, noise and light pollution and avoiding amenity and environmental problems that affect how we enjoy the environment in which we live and work. Saved Policy 3.2 of the Southwark Plan states that permission will not be granted for developments where a loss of amenity, including disturbance from noise, would be caused. The adopted Residential Design Standards SPD expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.

Daylight and Sunlight impact to existing residential units

114. A daylight and sunlight impact assessment was submitted with the planning application to assess the impact on nearby existing residential properties. The assessment utilised the following methodologies.

25 degree line

115. To determine whether a neighbouring existing building may be adversely affected, the initial test provided by the BRE is to establish if any part of the proposal subtends an angle of more than 25° from the lowest window serving the existing building. If this is the case then there may be an adverse effect and a more detailed assessment involving the Vertical Sky Component of the affected window would need to be carried out.

Vertical Sky Component (VSC)

116. VSC is a measure of the direct skylight reaching a point from an overcast sky. It is the ratio of the illuminance at a point on a given vertical plane to the illuminance at a point on a horizontal plane due to an unobstructed sky. For existing buildings, the BRE guideline is based on the loss of VSC at a point at the centre of a window, on the outer plane of the wall. The BRE guidelines state that if the VSC at the centre of a window is less than 27%, and it is less than 0.8 times its former value (i.e. the proportional reduction is greater than 20%), then the reduction in skylight will be noticeable, and the existing building may be adversely affected.

No Sky Line (NSL)

117. The second method is the No Sky Line (NSL) or Daylight Distribution (DD) method which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of 20% in the area of sky visibility, daylight may be affected.

Annual Probable Sunlight Hours (APSH)

118. In relation to sunlight, the BRE recommends that the APSH received at a given window in the proposed case should be at least 25% of the total available, including at least 5% in winter. Where the proposed values fall short of these, and the absolute loss is greater than 4%, then the proposed values should not be less than 0.8 times their previous value in each period (i.e. the proportional reductions should not be greater than 20%). The BRE guidelines state that *'...all main living rooms of dwellings, and conservatories, should be checked if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are less important, although care should be taken not to block out too much sun'*. The APSH figures are calculated for each window, and where a room is served by more than one window the contribution of each is accounted for in the overall figures for the room. The acceptability criteria are applied to overall room based figures.

Overshadowing, sunlight to amenity spaces

119. Open spaces should retain a reasonable amount of sunlight throughout the year. The BRE states that for an amenity space to “appear adequately sunlit throughout the year, at least half of the area should receive at least 2 hours of sunlight on 21 March”. Where this is not achieved, the difference between the area achieving 2 hours of sun on 21 March should be no less than 0.8 times its former value.
120. The neighbouring residential units that have the potential to be impacted in terms of daylight and sunlight are located at:
- Batwa House, Varcoe Road
 - Crown Place, Varcoe Road
 - Consented scheme at 1 Varcoe Road

Assessment

121. It should be noted that the applicant has carried an impact assessment on three different scenarios as it is envisaged that future developments are likely to come forward on the adjoining sites. This sets alternative target values. The BRE guidelines does state that different targets may be used based on the special requirements of the proposed development or its location.
122. Furthermore, the BRE guidance comments that where existing buildings has windows that are unusually close to the site boundary and taking more than their fair share of light, then the targets for these windows could be set to those for a ‘mirror-image’ building of the same height and size, an equal distance away on the other side of the boundary. In this case, the Crown Place buildings to the east of the site are located on the boundary with the application site. It is considered appropriate to have alternative targets based on the ‘mirror-image’. The applicant has therefore set out targets based on three scenarios:
123. Scenario one:
Existing surrounding context (drawings 11-01 to 11-03 in Appendix 1 of the assessment).
124. Scenario two:
Future surrounding context - consented and under construction 1 Varcoe Road scheme and the warehouses to the west of the development site replaced as per the OKRAAP (drawings

11-04 to 11-06 in Appendix 1 of the assessment).

125. Scenario three:
Mirror image massing of Crown Place (drawings 11-15 to 11-17 in Appendix 1 of the assessment). Existing and future surrounding context against the mirror image massing.
126. In terms of assessing the impact on the existing surrounding buildings, Officers have taken the view that scenario two is appropriate as the consented scheme at 1 Varcoe Road under construction, This considers the cumulative daylight impact.

Batwa House

Daylight

127. A total of 16 windows were assessed at Batwa House building. A summary of the effects on VSC and NSL is found in the table below.

Table: Summary of VSC impacts

Total no. of windows tested	Total no. of windows satisfying BRE %	No. of windows not satisfying BRE		
		20-29.9% reduction	30-39.9% reduction	>40% reduction
16	12	1	1	2

Table: Summary of NSL impacts

Total no. of rooms tested	Total no. of rooms satisfying BRE	No. of windows not satisfying BRE		
		20-29.9% reduction	30-39.9% reduction	>40% reduction
12	8	1	0	3

The NSL results show that of the 12 rooms tested, 8 would satisfy the BRE criteria.

128. The above demonstrates that there would be some significant, adverse impacts upon daylight to some of the residential units within Batwa House. However, it should be noted that the 1 Varcoe Road scheme had reduced the levels to Batwa House to a greater degree.
129. For the VSC test, where windows are not compliant there are at least two windows to those living rooms. The biggest loss in terms of NSL is to the first floor living room within Batwa House, but the ratio of VSC loss to these living room windows are not as significant. It should also be noted that those windows and rooms most affected have balconies facing the site and the BRE guidance notes that balconies to existing buildings can reduce levels of light to the rooms they serve. In summary, the impact upon the existing flats within Batwa House is considered to be acceptable.

Sunlight

130. The results show that out of the 16 south facing windows tested, 8 would satisfy the BRE criteria. The results indicate that 2 out of the 4 living rooms analysed would have at least one window that meet the BRE guidelines in terms of APSH. Of the remaining living rooms, the loss is not considered to be of a significant level.

Crown Place

131. In this instance, Officers consider it is appropriate to analyse the proposed scheme against the target values in the future surrounding context. Officers have also considered the results against the mirror-image massing in the future surrounding contexts. The tables below summarises the VSC and NSL impacts based on Scenario two (the future surrounding context).

Daylight

Table: Summary of VSC impacts

Total no. of windows tested	Total no. of windows satisfying BRE %	No. of windows not satisfying BRE		
		20-29.9% reduction	30-39.9% reduction	>40% reduction
87	29	13	5	40

Table: Summary of NSL impacts

Total no. of rooms tested	Total no. of rooms satisfying BRE	No. of windows not satisfying BRE		
		20-29.9% reduction	30-39.9% reduction	>40% reduction
67	34	2	4	27

132. It is noted that there would be windows that would experience a noticeable change in VSC levels. However, the significant losses are mainly to bathrooms and bedrooms and when assessing daylight levels within new developments the BRE guidance sets a lower target for bedrooms than for kitchens and living rooms, presumably because bedrooms are predominantly used at night and for sleeping. This can also be attributed to the fact that the existing building on the site is modest in size, being single storey and most of the site is an open yard. As such it has little, if any impact upon levels of light to the surrounding properties and the existing windows in Crown Place currently experience good daylight levels.
133. Officers have also analysed the results based on the mirror-image test. This considers what impact building a mirror image of Crown Place on the application site would have upon the existing Crown Place property. It demonstrates that if a mirror image were constructed on the

site the VSC and NSL losses would not be as significant. This demonstrates that even though the proposed building would have a greater impact, a mirror image would also have significant impacts upon the neighbouring building.

134. There are balconies to some of the flats in Crown Place and the BRE guidance notes that balconies to existing buildings can reduce levels of light to the rooms they serve. The applicant has included an assessment with the balconies removed using the mirror-image test. This shows that the VSC and NSL losses would not be significant in such an urban location.

Sunlight

135. The results indicate that 23 out of the 24 living rooms analysed would meet the BRE guidelines in terms of APSH. The one window that fails would serve a living room and this room has a total of 3 windows. It is therefore considered that the impacts on sunlight levels to Crown Place are not significant.

1 Varcoe Road

136. The consented building to the north would not have any habitable room windows that face the application site and therefore the applicant has not carried out an assessment of the daylight and sunlight impacts to this consented building. The proposed building at 2 Varcoe Road also does not sit significantly beyond the rear building line of 1 Varcoe Road and as such, there would be limited impacts on the future residents.

Impact on the T Marchant Industrial Estate

137. The site adjoining to the west is an industrial site so has not been subject to any BRE daylight and sunlight tests. The masterplan sets out the kind of development on the adjoining site and it is envisaged that the southern part would be low rise industrial units (Class B1 or B8) which would immediately adjoin 2 Varcoe Road. The northern part of the site is envisaged to comprise of mixed use development (residential and commercial). With this in mind, it is not considered that the proposed development would impact on the natural light to any future residential properties.

Fire safety

138. The applicant was asked to demonstrate how the scheme would comply with Building Regulations Part B (Fire Safety) as it is built on the western boundary and residential windows and balconies overlook this yard. This is to provide Officers with the confidence of the buildability and deliverability of the scheme so close to an industrial site. The applicant submitted a fire strategy and the council's Building Control considered that whilst further calculations and technical information are required, the development could sit on the boundary. This would be subject to Building regulations control post-permission stage. Officers would highlight that the site is constrained and there would not be any possibility of moving this building back by 1m from the boundary. Any movement of the building to the east of the site would have an unacceptable impact on the adjoining neighbours' amenity without reducing the depth of the building. Furthermore, the potential loss of units if the building was to reduce would make the scheme unviable.

Overlooking

139. As noted above, the scheme has been designed to avoid direct overlooking into neighbouring properties. There are windows on the northern flank wall facing the 1 Varcoe Road scheme, but there are no windows on the adjoining consented scheme. Batwa House is located to the north east of the application site and is at an oblique angle, which means that there would not be direct views of these neighbours from the proposed habitable rooms.
140. The scheme has been designed to limit overlooking into Crown Place properties, as discussed above. The scheme does propose windows and balconies to the rear on the western elevation (only from first floor upwards). At present, the adjoining site to the west is an industrial use and no residential properties are present. However, Officers acknowledge that this adjoining site is likely to be developed in the future as per the OKRAAP. The masterplan is that this area of the adjoining site would remain industrial. As such, those western windows proposed on the rear elevation would not impact on any residential units.

Outlook

141. It is considered that the proposed development will provide an improved outlook for nearby residential properties as the scheme would place a site that does not currently enhance the street townscape and is partly in a poor condition. The windows at Crown Place serve mainly non-habitable rooms or secondary windows to living rooms. The proposed development is of sufficient distance from neighbouring residential properties and would therefore not impact on their outlook or appear overbearing.

Air Quality

142. 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.
143. The council's Environmental Protection Team (EPT) has reviewed the submission and has not raised any objections.

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

144. The proposed non-residential floorspace in the form of B1(c) would be likely to be more compatible with residential uses than the existing use on the site. The noise transmission would be controlled by planning conditions, as recommended by the council's EPT. Overall it is not considered that any of the uses proposed would result in any significant loss of amenity to neighbouring residential occupiers, nor would they hinder the operation of the neighbouring industrial and warehousing units.

Transport issues

145. Core Strategy Strategic Policy 2 encourages walking, cycling and the use of public transport rather than travel by car. Saved policy 5.2 of the Southwark Plan seeks to ensure that developments do not result in adverse highway conditions; 5.3 require that the needs of pedestrians and cyclists to be considered and 5.6 establish maximum parking standards.

Accessibility

146. The site has an official PTAL (public transport accessibility level) of 1b (low) and is not located in a controlled parking zone (CPZ). However, the applicant has carried out a PTAL manual assessment in their Transport Assessment which showed that the site realistically had a PTAL of 3 (medium). It is noted that the site to the north (1 Varcoe Road) was considered to have a PTAL 3 rating and therefore Officers accept this assessment.
147. The submitted Transport Assessment (TA) was revised and is considered to provide an adequate appraisal of the relevant transport and highway related matters including an assessment of the potential for journeys to be made by sustainable modes of transport as well as detailed estimates of vehicular trips resulting from the development. As part of the TA they referred to surveys carried out from recent developments in the area that were still relevant.
148. The trip generation analysis demonstrates that the site would create a maximum of 7 vehicular movements for the residential and 13 for the commercial. These vehicle movements would not generate any significant adverse impact on the existing movements on the adjoining roads. Indeed, the type and size of the vehicles associated with the proposed development would be different to that entering the site for its current use and is considered to be more compatible with the surrounding residential uses to the north and east. It is not considered that the proposed development would impact on the local highway network in terms of trip generation.
149. The proposal is car free and does not provide off street disabled parking. Whilst it is not located within a CPZ, the council's programme for introduction and revision of CPZ's includes this area. Although the scheme does not provide any on-site wheelchair parking, a parking beat survey was undertaken in the vicinity of the site and there was spare capacity for an additional which demonstrated there is some capacity. This capacity could allow for applications for blue badge parking for wheelchair units if requested.
150. A condition would also ensure that no future residents or occupiers of the proposed development could obtain resident parking permits for any future CPZ. It is also recommended that a condition to ensure all marketing of the development promotes car free living, to ensure the occupants are well aware they will not be entitled to permits.
151. The site has a medium PTAL and the nearest bus stop on Ilderton Road has access to the P12 bus route a single decker linking Canada Water to Peckham via the Old Kent Road. It is also possible to walk through the Bramcote Estate to Rotherhithe New Road where the 381 can be accessed this is a double decker service that connects Waterloo to Peckham via Canada Water and the Blue (shopping centre).
152. The site is within walking distance of South Bermondsey Station. Within the next ten years the area is likely to benefit from the Bakerloo Line Extension and a new Bermondsey' station on the London Overground network 'New would be located on Surrey Canal Street.
153. As a borough the council agree with Transport for London (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 has been spent appropriately and the evidence for the further draw is the fairest way this could be managed. The proposal is that there is a maximum cap for TfL to call on which is £2,700 per unit. This will be able to be requested in stages between 3 - 5 years. The

initial contribution will be £300 per unit which will equate to £22,200 and this will be secured by S106.

154. Highways and transport infrastructure requirements are covered under CIL and the public highway improvements in the OKR Action Area would be delivered from a combination of land gain, s278 and CIL.

Servicing

155. The residential refuse collections will take place from Varcoe Road. It is noted that the refuse store for the private units are located on the southern end of the development, which would mean more than 10m of dragging distance and is not ideal for refuse collectors. However, with a robust servicing and management plan this could detail the servicing arrangements.
156. The proposal for on-site servicing is welcome together with a pick-up/drop-off area. However, the pick-up/drop-off area will also be used for servicing vehicles as turning area. The strategy will only be beneficial if managed properly to avoid vehicles reversing into the public highway if the pick-up/drop-off area is occupied when another vehicle arrives.
157. For a light 4.6t light van, the area allows for vehicles to enter and exit in forward gear. The vehicle tracking movement for 8m rigid vehicle shows vehicle reversing into the site since there is insufficient room for it to turn around and exit in forward gear. This manoeuvre would need to be managed well.
158. As such, a condition requiring a comprehensive and robust servicing and management plan is recommended prior to occupation detailing how on site servicing will be managed and any adverse impacts on the public road network mitigated.
159. In order to ensure that on-street servicing and deliveries do not negatively impact on the highway network, the council is recommending that applicants in the Old Kent Road Opportunity Area enter into Delivery Service Plan Bonds against their baseline figures for all daily servicing and delivery trips. These bonds would be calculated at £100 per residential unit and £100 per 5000 sqm of non-residential floor-space. In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, this is not intended as a financial penalty, but as a means of mitigating any harmful impacts from the proposed development and ensuring a better quality of life for current and future residents. As such, it is considered to meet the CIL Regulations 122 test, in that it would be:
 - (i) necessary to make the development acceptable in planning terms;
 - (ii) directly related to the development; and
 - (iii) fairly and reasonably related in scale and kind to the development.
160. 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 £7,500.00 based on the 74 residential units and 288sqm of non residential floorspace. The applicant has agreed to the contribution which can be collected via the legal agreement.

Type	Quantum	Bond Amount
Residential	74	£7,400.00
Non Residential	288sqm	£100.00
Daily Trips	20	£7,500.00

Cycle parking

161. The site is located close to Quietway 1 and will be in close to the proposed new linear park.
162. The proposals will provide 116 secure and covered cycle parking spaces for residents of which 18 will be provided in the form of Sheffield stands (15% of total). The cycle parking spaces for the apartments will be available to residents in two separate stores at ground level near the building entrances. This adheres to London Plan standards with some room for growth and it is recommended that detailed design should be submitted, to be secured by condition. The visitor cycle parking to the south of the site is compliant with London Plan but it is considered that locations could be reviewed and to be agreed by condition.
163. The council now has a programme to deliver the Santander cycle hire scheme for this site and a small contribution of £2,960 towards this is sought. There will be docking stations at South Bermondsey Station, and within the Liveable Neighbourhood which will be able to link to Bermondsey Tube, Canada Water, Surrey Quays and the Old Kent Road.

Highway improvements, walking and public realm

164. The area on Varcoe Road has generally narrow footways and are of a poor condition. The application provides for wider footways which will be delivered through the S278 agreement.

Construction management

165. This site is in a constrained location given that it is only accessed from Varcoe Road and close to residential areas. An obligation for a construction management plan is therefore to be secured.
166. Due to the cumulative impact of construction in the Old Kent Road AAP area a contribution of £20 per residential unit will be required to enable the highway authority and council's environment protection team to manage this. This equates to £1,480 for this application and will be secured through S106.

Design issues

167. Strategic Policy 12 of the Southwark Core Strategy 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 3.13 of the Southwark Plan asserts that the principles of good urban design must be taken into account in all developments which 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.
168. The emerging policy in the AAP sets out a vision for the Old Kent Road that would see

substantial change in the area over the next twenty years, whilst seeking design that responds well to its existing character and sense of place. There are no conservation areas or listed buildings in the vicinity of the application site.

Height, Scale and Massing

169. The building is 29.99m in height (from finished ground level) and does not constitute a 'tall building'. However, Officers have acknowledged that it does only fall marginally short of the 30m threshold for a tall building. It is 7 storeys on the northern end of the site, stepping up to 9 storeys to the south. The surrounding buildings have the following heights:
170. Batwa House - 6 storeys
Crown Place - 6 storeys
1 Varcoe Road consented scheme - part 6, part 7 and part 8 storeys
171. Given this context, although at its highest point the building would be one storey taller than the consented 1 Varcoe Road scheme, it would not be significantly taller than its context and officers consider that it would be appropriate in the street scene and of a proportionate scale in relation to its neighbours.
172. The building steps up to 9 storeys to the south and provides a termination of this street before the waste facility to the south.
173. The ground floor commercial unit has a floor to ceiling height of approximately 3.65m, which falls short of the desired 4m that is required in the AAP. However, this is designed to align with the floor to ceiling height on the adjoining consented scheme at 1 Varcoe Road. This is considered to be a sensible and coherent design approach.
174. Overall, it is considered that the building form is acceptable in terms of the emerging and existing context. The siting, scale, mass and height of the proposal would be proportionate. The arrangement of the various heights have been carefully considered at street level and above, The proposal responds to the potential future development around the site, as illustrated in the draft OKR AAP.

Site layout

175. The development is a single block, though it is articulated into two blocks, optimising the site area. The building is located on the western part of the site, with the eastern part providing the main access to the building. This access comprises an area of soft and hard landscaping for pedestrian access. Towards the northern end of the site, a shared surface drop off area is immediately accessed from Varcoe Road, with the remaining part of the access to be pedestrian only. The 'lane' as described by the applicant is a no-through route and is terminated by the visitors cycle stands and an area of soft landscaping.
176. The building has been sited to align with 1 Varcoe Road and is also consistent with the OKR masterplan. This is also to provide adequate outlook and protect the daylight to Crown Place properties. This continuation of the building along the western side is a sensible and logical approach. To the south of the site, the facade is set back to align with the residential building to the east (Crown Place), bounded by a change in level and the retaining wall at ground floor.
177. Ground floor entrances to both the residential and commercial areas are all on the eastern

elevation and the ground floor building line is recessed with the first floor slightly overhanging. However, it is considered that it would still create a generous approach to the residential lobby and commercial units.

178. The ground floor western façade would be blank to allow for future development on the adjoining site.

Detailed design, fenestration and materiality

179. Officers were originally concerned with the height, massing and layout, but this has been revised to address the concerns raised. The design proposed is of a high quality that responds well to the character of the surrounding context and the aspirations as set out in the AAP. The surrounding area is of mixed character and styles of architecture.
180. In terms of its composition, the two volumes combining to provide one building would be appropriate and would respond appropriately to the site's context. This is also seen at the consented scheme 1 Varcoe Road. The building is also designed with a base, middle and top. The ground floor is set back with the first floor overhanging slightly. The ground floor comprising the residential lobbies and a commercial unit in the centre provides an active frontage with its high floor-to-ceiling height glazed façade.
181. The building is well articulated and modulated with balconies and bay windows. The balconies would have open metalwork and bright coloured soffits, where details could be secured by a condition. The east elevation would have protruding window features in the form of angled bay windows adding variety and interest to this façade.
182. The ground floor western façade is left blank to ensure it does not compromise future development of the adjoining site. The two floors above would have 'wintergardens' that could open up as balconies.
183. Details such as coloured glazed bricks on some of the soldier course of the windows and sawtooth glazed brick stretched horizontally across the facades add life to this building. It is considered that this detailing would be appropriate for the building proposed, adding articulation and interest to the elevation on all floors. The predominant use of masonry for the whole building follows the design guidance of the draft AAP
184. In order to ensure that the depth of architectural expression and the quality and contrast of the materials achieved, a condition is to be imposed requiring materials samples to be presented on-site to and approved by the Local Planning Authority.

Conclusion on design

185. The building would be of an appropriate height and scale, being sympathetic with the consented scheme to the north and is accordingly considered acceptable. The revisions received satisfy Officer's original concerns. The design quality, and use of brick would ensure that a high quality of finish would be achieved and conditions are recommended in relation to detailed design and material samples.

Impact on character and setting of a listed building and/or conservation area

186. The Grade II listed gasholder (No.13, Old Kent Road former gasworks) is located some

distance away from the application site. It is not considered that the proposed development would harm the character, appearance of the setting of the heritage asset.

Impact on trees

187. There are no existing trees on the site and the plans indicate there would be the planting of trees in the landscaped forecourt. However, it is also noted that the majority of the site frontage is hard landscaping. In light of this and given the constraints of the site to provide any more tree planting, the opportunity exists for a contribution to be required to enhance amenity within the vicinity via street trees at a cost of £3,000 per tree. The council's Urban Forester has confirmed that given the limited site frontage to Varcoe Road, 3 No. trees would be sufficient, totalling a £9,000 contribution.

Planning obligations (S.106 undertaking or agreement)

188. 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 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.

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

Archaeology: £6,778

Affordable housing monitoring: £3,176.4

Carbon Offset – Green Fund: £111,168

Delivery and service bond: £7,500

Public open space: £75,850

Trees: 3,000 per tree (for 3 No. trees) totalling £9,000

Transport for London Buses: £22,200

Santander bicycle hire scheme: £2,960

Contribution in lieu of private / communal amenity space: £9,635

Construction management plan review and monitoring: £1,480

Section 106 admin charge at 2% of total

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

- Affordable housing provisions
- Appointment of workspace co-ordinator
- Affordable workspace – 10% of floorspace at 28.8sqm
- Terms for the affordable workspace – £11 per sq ft, over a 15 year period
- Jobs, skills and training during construction period (including fall-back financial contribution if targets not met). This includes targets of 13 No. jobs or max £55,900 offset, 13 No. Training courses or max £1,950 offset and 3 No. Apprenticeships or max £4,500 offset;
- Marketing, allocation and fit out of the 7 No. wheelchair units;
- Highway works – s278 agreement to repave the footway fronting the development including new kerbing on Varcoe Road using materials in accordance with Southwark’s Streetscape Design Manual (precast concrete slabs and granite kerbs).
- Service management plan
- Car club membership for 3 years
- Parking permits exclusion zone for future occupants
- Connection to a future district heating system
- Off-set contribution will be secured in in event that there is a shortfall in attenuation required

191. In the event that an agreement has not been completed by 12 February 2020, the Committee is asked to authorise the director of planning to refuse permission, if appropriate, for the following reason:

In the absence of a signed S106 legal agreement there is no mechanism in place to secure adequate provision of affordable housing and mitigation against the adverse impacts of the development through contributions and it would therefore be contrary to 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 Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015).

Mayoral and Southwark Community Infrastructure Levy (CIL)

192. 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.

193. In this instance the scheme is liable to Mayoral CIL payment and Southwark CIL payment.

Sustainable development implications

194. 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. Energy statements should demonstrate how the zero carbon target for residential developments will be met, with at least a 35% on-site reduction beyond Part L 2013 and proposals for making up the shortfall to achieve zero carbon, where required. It should also demonstrate at least a 35% on-site reduction beyond Part L 2013 for non-residential development. An Energy statement based on the Mayor's hierarchy has been submitted.

Be lean (use less energy)

195. Energy efficiency measures include a range of passive measures such as solar shading, thermal mass and passive ventilation where possible to manage heat. Other measures include efficient building fabric, improved building air tightness and efficient lighting. The regulated carbon saving achieved in this step of the Energy Hierarchy is 27.8% over the site wide baseline level.

Be clean (supply energy efficiently)

196. The applicant has explored the use of a combined heat and power (CHP), but it was considered that the air source heat pump would be the better alternative technology to provide both the heating and cooling of the development. Air source heat pumps being electric will also benefit from the decarbonisation of the UK power grid and improvement in carbon factors.
197. The site is located within an area where there are plans for the delivery of a district heating network, referred to as "SELCHP" energy system. The GLA has highlighted that connection to the network should be prioritised and evidence of correspondence with the network operator should be provided.
198. The applicant has committed to connect to SELCHP and it is standard that major developments in parts of the council would be future-proofed for connection to a future district heating system which would be secured through the S106 agreement.

Be green (low or carbon zero energy)

199. A range of low or zero carbon technologies was considered and photovoltaics (PVs) and air source heat pumps were found as suitable technologies for the development. The regulated carbon saving achieved in this step of the Energy Hierarchy is 10% over the site wide baseline level. This would not meet the 20% target for Strategic Policy 13 of the Core Strategy, but it is noted the roof area provides communal amenity space and a small children's play area which means utilising the whole roof would not be feasible.
200. Overall, the proposed measures would result in an overall reduction in carbon dioxide emissions when compared to a scheme compliant with the building regulations. Effort has been made to maximise savings at each step of the Energy Hierarchy as far as technically and financially feasible.
201. For the residential element, a 39.03% carbon reduction would be achieved meeting the minimum 35% requirements (against Part L of the Building Regulations 2013) as set out in

policy 5.2 of the London Plan. For the commercial element, a 25.2% reduction in carbon emissions would be achieved, falling short of the 35%. However, the total savings across the whole site would be 37.8%. The London Plan does have a zero carbon homes target and would require the development to make a carbon offset payment for the remaining shortfall.

BREEAM

202. Strategic policy 13 of the Core Strategy requires the commercial units to achieve BREEAM 'excellent'. A BREEAM Pre-assessment report has been undertaken which demonstrates that an 'Excellent' standard can be achieved, which meet the required "Excellent" standard that is required for the commercial element. A pre-fit condition for the commercial workspace to secure an 'Excellent' standard is therefore recommended.

Biodiversity

203. The site is an industrial scaffolding yard with hardstanding and in its current state there is little or no ecological value and therefore its redevelopment offers the opportunity to enhance biodiversity opportunities.
204. Ecological appraisal of the site comprises a desk study and an Extended Phase 1 Habitat survey with specific focus on bats and nesting birds. This report presented the findings of the above surveys and the council's Ecology Officer agrees with the results. The report and planning statement make recommendations that ecological enhancement should be secured conditions. The council's Ecology Officer has advised a number of conditions including swift bricks, sparrow terraces and bat tubes and biodiverse roof. A management plan is also required via a condition to cover those enhancements.

Flood Risk and Water Resources

205. The application site is located within Flood Zone 3, which is considered to be 'High Risk' but does benefit from the Thames tidal defences. Following amended plans, a revised Flood Risk Assessment (FRA) was submitted. The Environment Agency (EA) was re-consulted and has not made any objections to the proposals subject to their recommended conditions.
206. The council's Flood and Drainage Team has also reviewed the application and notes that the development would seek to limit surface water discharges to the estimated greenfield runoff rate where practical, in line with Southwark's Strategic Flood Risk Assessment and Policy 5.13 of the London Plan.
207. A greenfield runoff rate offset of £366 per cubic metre will be secured in in event that there is a shortfall in attenuation required to limit surface water run off, which is required by the draft draft AAP 11.

Other matters

Archaeology

208. The site is within the Bermondsey Lake Archaeology Priority Zone (APZ) and a desk-based assessment of the site identifying any likely archaeological potential has been prepared by applicant, which has been reviewed by the council's archaeologist.

209. It was originally considered by the council's archaeologist that a small scale pre-determination evaluation was required particularly as a basement was previously proposed. The basement has since been omitted from the scheme and it has been accepted that as this is a small site and the adjoining site at 1 Varcoe Road did not produce nationally significant archaeological results, conditions would suffice, which would secure a programme of archaeological evaluation, mitigation and reporting prior to any demolition. It should be noted that Officers are taking a pragmatic stance in this instance as access to the area for a single geo-archaeological borehole is not possible. It does not set a precedent for any future developments on surrounding sites.

Contamination

210. The applicant has submitted a site investigation report. The council's EPT and the EA has reviewed this and has recommended a condition to secure an intrusive site investigation and associated risk assessment to be completed to fully characterise the nature and extent of any contamination on the site along with any remediation strategy.

Conclusion on planning issues

211. The proposed development would result in the introduction of residential uses into the SIL and would therefore represent a departure from the adopted development plan. However, the adopted London Plan clearly identifies the Old Kent Road as an opportunity area which will undergo significant transformation with substantial growth including new housing. In advance of emerging policy being adopted, and SIL being formally released, this proposal must be weighed against the wider regeneration benefits of the scheme.
212. The proposed development would potentially increase the numbers of jobs on the site and deliver new housing, including a policy compliant level of affordable housing in terms of habitable rooms. Affordable workspace has also been proposed. Recognising the changing character and uses carried out in the immediate area and in particular the surrounding block of flats, it is not felt that any harm to existing businesses would arise by the introduction of housing on this site. In light of this it is considered that the principle of the proposed development should be supported in this instance.
213. The proposal would deliver a good standard of accommodation with limited impacts on existing neighbours' amenity. It is noted that the impacts of the scheme in relation to daylight and sunlight, are on balance considered acceptable, and whilst there would be departures from the BRE guidelines, the daylight and sunlight levels are still considered adequate for a dense urban area. The design and materiality is considered to respond well to the existing character and surrounding context.
214. It is therefore recommended that planning permission be granted subject to conditions and the completion of a legal agreement under the terms as set out above.

Consultations

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

Consultation replies

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

Summary of consultation responses

217. At the time of writing, a total 2 No. consultation responses have been received from members of the public. The objections raised have been summarised above.

Summary of responses from external and statutory consultees

Environment Agency

218. No objection subject to conditions.

Health and Safety Executive (HSE)

219. The site lies within the consultation distance of a major hazard site - Old Kent Road Gas Holder Station. The HSE does not advise, on safety grounds, against the granting of planning permission.

Historic England

220. No comments to make.

London Underground Infrastructure Protection

221. No comments to make.

Metropolitan Police Designing Out Crime officer

222. This development is suitable to achieve Secured By Design accreditation and would seek to have a 'Secured by Design' condition for the whole development, attached to any permission that may be granted.

Natural England

223. No comments to make.

Thames Water

224. The proposed development is located within 15m of Thames Water's underground water assets and as such would like an informative attached to any approval granted.

Community impact statement / Equalities Assessment

225. 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.

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

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

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

229. The building and yard is currently used for a scaffolding company, though most of the site is now largely redundant. There are therefore no impacts on persons sharing relevant protected characteristics within the site. The immediate adjoining area comprises a mix of residential and industrial use. It is not considered that the proposed mixed use scheme would give rise to any equalities issues in respect of persons sharing the relevant characteristics set out above.

Human rights implications

230. This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.

231. This application has the legitimate aim of providing 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 DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/2324-72 Application file: 18/AP/2895 Southwark Local Development Framework and Development Plan Documents	Place and Wellbeing Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 5729 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	Wing Lau, Team Leader	
Version	Final	
Dated	1 November 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	1 November 2019	

APPENDIX 1

Consultation undertaken

Site notice date: 05/10/2018

Press notice date: 04/10/2018

Case officer site visit date: 05/10/2018

Neighbour consultation letters sent: 27/09/2018

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
Property Division
Public Health Team
Waste Management

Statutory and non-statutory organisations consulted:

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

Neighbour and local groups consulted:

Flat 1 1 Barkworth Road SE16 3BY

3 Barkworth Road London SE16 3BY

404 Crown Place Apartments 20 Varcoe Road SE16
3AD

403 Crown Place Apartments 20 Varcoe Road SE16

45 Credon Road London SE16 3AA	3AD
Flat 4 1 Barkworth Road SE16 3BY	408 Crown Place Apartments 20 Varcoe Road SE16 3AD
Flat 3 1 Barkworth Road SE16 3BY	407 Crown Place Apartments 20 Varcoe Road SE16 3AD
Flat 2 1 Barkworth Road SE16 3BY	406 Crown Place Apartments 20 Varcoe Road SE16 3AD
41 Credon Road London SE16 3AA	402 Crown Place Apartments 20 Varcoe Road SE16 3AD
Flat 1 43 Credon Road SE16 3AA	307 Crown Place Apartments 20 Varcoe Road SE16 3AD
46-50 Verney Road London SE16 3DH	306 Crown Place Apartments 20 Varcoe Road SE16 3AD
66 Verney Road London SE16 3DH	305 Crown Place Apartments 20 Varcoe Road SE16 3AD
Flat 4 43 Credon Road SE16 3AA	401 Crown Place Apartments 20 Varcoe Road SE16 3AD
Flat 3 43 Credon Road SE16 3AA	309 Crown Place Apartments 20 Varcoe Road SE16 3AD
Flat 2 43 Credon Road SE16 3AA	308 Crown Place Apartments 20 Varcoe Road SE16 3AD
80 Verney Road London SE16 3DB	G06 Crown Place Apartments SE16 3AD
103 Verney Road London SE16 3DA	G05 Crown Place Apartments SE16 3AD
Flat 6 101 Verney Road SE16 3DA	G04 Crown Place Apartments SE16 3AD
1 Ryder Drive London SE16 3BB	G09 Crown Place Apartments SE16 3AD
64 Verney Road London SE16 3DH	G08 Crown Place Apartments SE16 3AD
Flat 1 Arundel Court SE16 3DB	G07 Crown Place Apartments SE16 3AD
Flat 5 101 Verney Road SE16 3DA	G03 Crown Place Apartments SE16 3AD
Flat 1 101 Verney Road SE16 3DA	501 Crown Place Apartments 20 Varcoe Road SE16 3AD
Flat 6 1 Barkworth Road SE16 3BY	410 Crown Place Apartments 20 Varcoe Road SE16 3AD
Flat 5 1 Barkworth Road SE16 3BY	409 Crown Place Apartments 20 Varcoe Road SE16 3AD
Flat 4 101 Verney Road SE16 3DA	G02 Crown Place Apartments SE16 3AD
Flat 3 101 Verney Road SE16 3DA	G01 Crown Place Apartments SE16 3AD
Flat 2 101 Verney Road SE16 3DA	502 Crown Place Apartments 20 Varcoe Road SE16 3AD
2 Varcoe Road London SE16 3DG	304 Crown Place Apartments 20 Varcoe Road SE16 3AD
Flat 5 6 Varcoe Road SE16 3DG	101 Crown Place Apartments 20 Varcoe Road SE16 3AD
Flat 4 6 Varcoe Road SE16 3DG	10 Varcoe Road London SE16 3DG
Flat 3 6 Varcoe Road SE16 3DG	104 Crown Place Apartments 20 Varcoe Road SE16 3AD
Flat 8 6 Varcoe Road SE16 3DG	103 Crown Place Apartments 20 Varcoe Road SE16 3AD
Flat 7 6 Varcoe Road SE16 3DG	102 Crown Place Apartments 20 Varcoe Road SE16 3AD
Flat 6 6 Varcoe Road SE16 3DG	201 Crown Place Apartments 20 Varcoe Road SE16 3AD
Flat 2 6 Varcoe Road SE16 3DG	58 Verney Road London SE16 3DH
Flat 25 Batwa House SE16 3BF	68 Verney Road London SE16 3DH
Flat 19 Batwa House SE16 3BA	42 Verney Road London SE16 3DH
	108 Crown Place Apartments 20 Varcoe Road SE16 3AD

Flat 18 Batwa House SE16 3BA	107 Crown Place Apartments 20 Varcoe Road SE16 3AD
Flat 1 6 Varcoe Road SE16 3DG	106 Crown Place Apartments 20 Varcoe Road SE16 3AD
Flat 8 8 Varcoe Road SE16 3DG	210 Crown Place Apartments 20 Varcoe Road SE16 3AD
Flat 7 8 Varcoe Road SE16 3DG	209 Crown Place Apartments 20 Varcoe Road SE16 3AD
Flat 6 8 Varcoe Road SE16 3DG	208 Crown Place Apartments 20 Varcoe Road SE16 3AD
70-72 Verney Road London SE16 3DH	303 Crown Place Apartments 20 Varcoe Road SE16 3AD
52-56 Verney Road London SE16 3DH	302 Crown Place Apartments 20 Varcoe Road SE16 3AD
Flat 9 8 Varcoe Road SE16 3DG	301 Crown Place Apartments 20 Varcoe Road SE16 3AD
Flat 5 8 Varcoe Road SE16 3DG	207 Crown Place Apartments 20 Varcoe Road SE16 3AD
Flat 1 8 Varcoe Road SE16 3DG	203 Crown Place Apartments 20 Varcoe Road SE16 3AD
Flat 9 6 Varcoe Road SE16 3DG	202 Crown Place Apartments 20 Varcoe Road SE16 3AD
Flat 4 8 Varcoe Road SE16 3DG	105 Crown Place Apartments 20 Varcoe Road SE16 3AD
Flat 3 8 Varcoe Road SE16 3DG	206 Crown Place Apartments 20 Varcoe Road SE16 3AD
Flat 2 8 Varcoe Road SE16 3DG	205 Crown Place Apartments 20 Varcoe Road SE16 3AD
2 Ryder Drive London SE16 3BB	204 Crown Place Apartments 20 Varcoe Road SE16 3AD
Flat 33 Arundel Court SE16 3DB	Flat 20 Batwa House SE16 3BA
Flat 32 Arundel Court SE16 3DB	Flat 2 Batwa House SE16 3BA
Flat 31 Arundel Court SE16 3DB	Flat 4 Batwa House SE16 3BA
Flat 36 Arundel Court SE16 3DB	Flat 3 Batwa House SE16 3BA
Flat 35 Arundel Court SE16 3DB	Flat 21 Batwa House SE16 3BA
Flat 34 Arundel Court SE16 3DB	Flat 38 Batwa House SE16 3BF
Flat 30 Arundel Court SE16 3DB	Flat 34 Batwa House SE16 3BF
Flat 26 Arundel Court SE16 3DB	Flat 33 Batwa House SE16 3BF
Flat 25 Arundel Court SE16 3DB	Flat 32 Batwa House SE16 3BF
Flat 24 Arundel Court SE16 3DB	Flat 37 Batwa House SE16 3BF
Flat 29 Arundel Court SE16 3DB	Flat 36 Batwa House SE16 3BF
Flat 28 Arundel Court SE16 3DB	Flat 35 Batwa House SE16 3BF
Flat 27 Arundel Court SE16 3DB	Flat 14 Batwa House SE16 3BA
Unit 59 42-72 Verney Road SE16 3DH	Flat 13 Batwa House SE16 3BA
Second Floor Credon House SE16 3DA	Flat 12 Batwa House SE16 3BA
Flat 39 Arundel Court SE16 3DB	Flat 17 Batwa House SE16 3BA
Flat 38 Arundel Court SE16 3DB	Flat 16 Batwa House SE16 3BA
Flat 37 Arundel Court SE16 3DB	Flat 15 Batwa House SE16 3BA
Part First Floor Credon House SE16 3DA	Flat 11 Batwa House SE16 3BA
149 Ormside Street London SE15 1TF	Flat 7 Batwa House SE16 3BA
Flat 40 Arundel Court SE16 3DB	Flat 6 Batwa House SE16 3BA
Flat 23 Arundel Court SE16 3DB	Flat 5 Batwa House SE16 3BA
Flat 6 Arundel Court SE16 3DB	Flat 10 Batwa House SE16 3BA
Flat 5 Arundel Court SE16 3DB	Flat 9 Batwa House SE16 3BA
Flat 4 Arundel Court SE16 3DB	Flat 8 Batwa House SE16 3BA
Flat 9 Arundel Court SE16 3DB	Flat 31 Batwa House SE16 3BF

Flat 8 Arundel Court SE16 3DB
Flat 7 Arundel Court SE16 3DB
Flat 3 Arundel Court SE16 3DB
5 Ryder Drive London SE16 3BB
4 Ryder Drive London SE16 3BB
3 Ryder Drive London SE16 3BB
Flat 2 Arundel Court SE16 3DB
1 Varcoe Road London SE16 3DG

6 Ryder Drive London SE16 3BB
Flat 19 Arundel Court SE16 3DB
Flat 18 Arundel Court SE16 3DB
Flat 17 Arundel Court SE16 3DB
Flat 22 Arundel Court SE16 3DB
Flat 21 Arundel Court SE16 3DB
Flat 20 Arundel Court SE16 3DB
Flat 16 Arundel Court SE16 3DB
Flat 12 Arundel Court SE16 3DB
Flat 11 Arundel Court SE16 3DB
Flat 10 Arundel Court SE16 3DB
Flat 15 Arundel Court SE16 3DB

Flat 14 Arundel Court SE16 3DB
Flat 13 Arundel Court SE16 3DB
405 Crown Place Apartments 20 Varcoe Road SE16 3AD

Flat 43 Batwa House SE16 3BF
Flat 42 Batwa House SE16 3BF
Flat 41 Batwa House SE16 3BF
62 Verney Road London SE16 3DA
Flat 45 Batwa House SE16 3BF
Flat 44 Batwa House SE16 3BF
Flat 40 Batwa House SE16 3BF
211 Crown Place Apartments 20 Varcoe Road SE16
3AD
G10 Crown Place Apartments SE16 3AD
Flat 39 Batwa House SE16 3BF
West Newton House SE16 3DA
East Newton House SE16 3DA
Flat 27 Batwa House SE16 3BF
Flat 26 Batwa House SE16 3BF
Flat 25 Batwa House SE16 3BF
Flat 30 Batwa House SE16 3BF
Flat 29 Batwa House SE16 3BF
Flat 28 Batwa House SE16 3BF
Flat 24 Batwa House SE16 3BF
Ground Floor And Part First Floor Credon House SE16
3DA
60-61 Verney Road London SE16 3DH
Flat 23 Batwa House SE16 3BF
Flat 22 Batwa House SE16 3BF
Flat 1 Batwa House SE16 3BF

Re-consultation: 10/07/2019

Consultation responses received

Internal services

Economic Development Team
Flood and Drainage Team

Statutory and non-statutory organisations

Environment Agency
Health & Safety Executive
Historic England
Metropolitan Police Service (Designing out Crime)
Natural England - London Region & South East Region
Thames Water - Development Planning
London Underground Infrastructure Protection

Neighbour consultation

Two representations received from residents on Varcoe Road