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Item No. 6.1	Classification: Open	Date: 5 February 2020	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 19/AP/1612 for: Full Planning Application Address: ST OLAVES NURSING HOME, ANN MOSS WAY, LONDON SE16 2TL Proposal: Demolition of the existing buildings on site (a derelict single storey nursing home and porta-cabins) and construction of two buildings (Building A - Part 4/Part 5/Part 6 storey building fronting Lower Road, Building B - Part 3/Part 4 storey building fronting Ann Moss Way) providing 62 residential units together with 2 wheelchair parking spaces and associated landscaping		
Ward(s) or groups affected:	Rotherhithe		
From:	Director of Planning		
Application Start Date 20/06/2019		Application Expiry Date 19/09/2019	
Earliest Decision Date 20/12/2019			

RECOMMENDATIONS

1. That the planning committee grant planning permission, subject to conditions and the applicant entering into an appropriate legal agreement; and
2. That in the event that the requirements of (1) are not met by 15 May 2020, the director of planning be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 134 of this report.

EXECUTIVE SUMMARY

3. Demolition of a care home (C2 use class) and ambulance station (Sui Generis) and construction of new residential development of 62 units is considered to be acceptable in land use terms as additional residential floor space would be created in the Canada Water Opportunity Area.
4. The proposal would provide 50% affordable housing, greatly exceeding the minimum requirement of 35%, as well as offering a policy compliant split of 26% social rented and 24% intermediate units.
5. 76 objections have been received. Amendments have been made to the proposal following review of neighbours' concerns. Refuse storage and collection has been adjusted to avoid the risk of bins being left on the street, public access to the play area has been offered to promote integration of the new development within the existing community, and design changes have been made to reduce the height of Block B in relation to Ann Moss Way

terrace properties.

6. The proposal would not cause significant harm to amenity of adjoining occupiers in terms of access to natural daylight, sunlight or causing overshadowing. The proposed residential blocks have also been designed in a way that avoids direct overlooking over short distances, and so the privacy of surrounding occupiers would be preserved.
7. The buildings have been designed to respond to their context while still making efficient use of land and delivering much needed housing. The proposal is considered to be of high design quality, which would positively contribute to the local area.
8. The proposal would result in increased vehicular activity on Ann Moss Way associated with servicing and deliveries, but it is considered that existing infrastructure is capable of accommodating the additional number of occupiers.
9. The proposed design would be highly energy efficient, exceeding expectations for carbon emission savings. It would also result in significant landscaping improvements and has the potential to result in ecology gain by providing bird and bat nests.
10. In summary, the proposed development would provide the following benefits:
 - Efficient use of currently vacant and disused brownfield land;
 - Provision of new high quality homes, including 50% affordable housing;
 - area high standard of design and residential quality;
 - Access to new play space for local children as well as occupiers of the development.

BACKGROUND INFORMATION

Site location and description

11. The application site contains the former Ann Moss Way Care Home and ambulance station which have been vacant since 2008. It is an L-shaped area, between Rotherhithe Evangelical Church to the north west, Chaucer Resource Centre to the west, Ann Moss Way residential terraces to the south and south west, and a block of residential flats on the corner of Ann Moss Way and Lower Road to the east of the site.



Location of the site

12. The application site is subject to the following development plan designations:

- Canada Water Action Area;
- Canada Water Strategic Heating Area;
- Suburban Density Zone;
- Air Quality Management Area;
- Public Transport Accessibility Level – 4;
- Flood Risk Zone 3.

Adoption of the Draft New Southwark Plan would add a designation to the list set out above - the site would also be located within the Canada Water Opportunity Area.

13. The application site is not located within a conservation area, is not listed and is not located within the vicinity of any listed buildings. It does, however, sit within the protected view 5A.2 from Greenwich Park Wolfe statue to Tower Bridge of the London Plan Viewing Corridor.

Details of proposal



Proposed development

14. The proposed development seeks to deliver 62 residential units in two blocks with the following unit type composition:

Unit Type	Private Units	Affordable Units		Total
		Social rent	Intermediate	
1-bedroom	8	4	9	21
2-bedroom	18	0	7	25
3-bedroom	5	10	1	16
Total	31	14	17	62
Wheelchair adaptable	2		2	4
Wheelchair Accessible		2		2
Total				6

15. All of the private and majority of the intermediate units would be located in the taller block, which on plans and in supporting documents has been identified as Block A. It would be a building ranging in height from four to six storeys located perpendicular to Lower Road and running parallel to Rotherhithe Evangelical Church to the north west.

16. Block B would be three to four storeys high and would be positioned along Ann Moss Way, directly opposite the existing two storey terrace of residential dwellings. Block B would contain all of the social rented units and the remaining intermediate units. On the ground floor it has been designed to resemble the frontage of terraced housing, while on the upper floors it would contain flats with deck access facing Block A.
17. Located between the two blocks is the communal amenity space as well as the play area. In addition, a roof terrace at fourth floor level has been designed to be accessible by residents together with a landscaped area on the north side of Block A, on the boundary with the Rotherhithe Evangelical Church.
18. Each of the proposed residential units would also have access to private outdoor amenity space in the form of a balcony, terrace or a garden.
19. The development would be car free apart from two disabled parking spaces provided at ground level with access from Ann Moss Way. 176 long stay and short stay cycle parking spaces are proposed to be distributed between a dedicated cycle storage space to the rear of Block A and an internal cycle storage space within Block B.
20. Following neighbour consultation and initial review of the proposal, some amendments as detailed below were made to the proposal:
 - Affordable housing offer was increased from 46% to 50% based on habitable rooms;
 - Height of Block B's elevation facing Ann Moss Way residential terrace was reduced;
 - Internal layouts of several units were adjusted to meet space requirements;
 - Mutual overlooking between future occupiers of Block A was mitigated by screens to balconies and obscured glazing to some windows.

Relevant planning history

21. 04/AP/0186 – Full planning application for:
Change of use to an ambulance station together with the provision of a tarmacked yard, ambulance bays, car parking spaces, new 6ft (1.8m) fence towards the rear of the site and new 6ft (1.8m) railings and gate to provide a new vehicular access onto Ann Moss Way.
Granted permission on 08/06/2004
22. No other planning applications have been submitted prior to the current one, however, several pre-application enquiries have been discussed in 2015, 2016, and again in 2018.

Relevant planning history of adjoining sites

23. 48 Lower Road (to the east of the site)
18/AP/1533 – Full planning application for:
Construction of a hip to gable rear dormer extension with Juliette balcony together with raising the existing roof ridge by 30 cm and installing two roof lights to front roof slope
Granted permission on 10/07/2018
24. Gate house, Ann Moss Way
17/AP/2094 – Prior Approval application for:
Change of use of existing offices (Use Class B1(a)) to 1 x 3 bedroom unit (Use Class C3)

Prior approval was granted on 19/07/2017

25. Community engagement consultation is currently taking place in relation to potential re-development of 1 Ann Moss Way, though a planning application has not yet been submitted.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

26. The main issues to be considered in respect of this application are:
- a) Principle of development;
 - b) Impact of proposed development on amenity of neighbours;
 - c) Housing mix and affordable housing;
 - d) Quality of accommodation;
 - e) Design;
 - f) Transport and highways;
 - g) Sustainable development implications;
 - h) Other matters
 - i) Planning obligations (S106 undertaking or agreement)

Adopted planning policy

National Planning Policy Framework (2019)

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 212 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.

Chapter 2 - Achieving sustainable development
Chapter 5 - Delivering a sufficient supply of homes
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

London Plan 2016

29. The London Plan is the regional planning framework and was adopted in 2016. The relevant policies of the London Plan 2016 are:
- Policy 3.3 - Increasing housing supply
Policy 3.4 - Optimising housing potential
Policy 3.5 - Quality and design of housing developments
Policy 3.6 - Children and young people's play and informal recreation facilities

Policy 3.8 - Housing choice
 Policy 3.9 - Mixed and balanced communities
 Policy 3.12 - Negotiating affordable housing on individual private residential and mixed use schemes
 Policy 5.1 - Climate change mitigation
 Policy 5.2 - Minimising carbon dioxide emission
 Policy 5.3 - Sustainable design and construction
 Policy 5.7 - Renewable energy
 Policy 5.10 - Urban greening
 Policy 5.11 - Green roofs and development site environs
 Policy 5.12 - Flood risk management
 Policy 5.13 - Sustainable drainage
 Policy 5.15 - Water use and supplies
 Policy 5.21 - Contaminated land
 Policy 6.3 - Assessing effects of development on transport capacity
 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 7.5 - Public realm
 Policy 7.6 - Architecture
 Policy 7.14 - Improving air quality
 Policy 7.15 - Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes
 Policy 7.19 - Biodiversity and access to nature
 Policy 7.21 - Trees and woodlands
 Policy 8.2 - Planning obligations
 Policy 8.3 - Community infrastructure levy

Core Strategy 2011

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

Strategic Policy 1 - Sustainable development
 Strategic Policy 2 - Sustainable transport
 Strategic Policy 5 - Providing new homes
 Strategic Policy 6 - Homes for people on different incomes
 Strategic Policy 11 - Open spaces and wildlife
 Strategic Policy 12 - Design and conservation
 Strategic Policy 13 - High environmental standards

Southwark Plan 2007 (saved policies)

31. 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:

- Policy 2.5 - Planning obligations
- Policy 3.1 - Environmental effects
- Policy 3.2 - Protection of amenity
- Policy 3.3 - Sustainability assessment
- Policy 3.4 - Energy efficiency
- Policy 3.6 - Air quality
- Policy 3.9 - Water
- Policy 3.11 - Efficient use of land
- Policy 3.12 - Quality in design
- Policy 3.13 - Urban design
- Policy 3.14 - Designing out crime
- Policy 3.28 - Biodiversity
- Policy 3.31 - Flood defences
- Policy 4.2 - Quality of residential accommodation
- Policy 4.3 - Mix of dwellings
- Policy 4.4 - Affordable housing
- Policy 4.5 - Wheelchair affordable housing
- Policy 4.6 - Loss of residential accommodation
- Policy 4.7 - Non self contained housing for identified user groups
- Policy 5.2 - Transport impacts
- Policy 5.3 - Walking and cycling
- Policy 5.6 - Car parking
- Policy 5.7 - Parking standards for disabled people

Canada Water Area Action Plan (2015)

- 32. Policy 6 - Walking and cycling
- Policy 8 - Vehicular traffic
- Policy 18 - Open spaces and biodiversity
- Policy 19 - Children's play space
- Policy 20 - Energy
- Policy 21 - New homes
- Policy 22 - Affordable homes
- Policy 23 - Family homes
- Policy 24 - Density of developments
- Policy 34 - S106 planning obligations and the community infrastructure levy

Supplementary Planning Guidance Documents

- 33. GLA Shaping Neighbourhoods: Play and informal recreation SPG 2012
- GLA Sustainable Design and Construction SPG 2014 Carbon dioxide off-setting
- GLA Energy Assessment Guidance (2018)
- GLA Affordable Housing and Viability SPD (2017)
- Sustainable Design and Construction SPD February (2009)
- 2015 Technical Update to Residential Design Standards SPD
- Waste Management Guidance Notes for Residential Developments (2014)
- Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD (2015)
- Development Viability SPD (2016)

Affordable Housing SPD (2008) and Draft Affordable Housing SPD (2011)

Emerging planning policy

Draft New London Plan

34. The draft New London Plan was published in November 2017 and the first and only stage of consultation closed in March 2018. Minor suggested changes to the plan were published in August 2018 and an Examination in Public (EIP) took place between January and May 2019. Further suggested changes to the Plan have been proposed by the Mayor and published in response to the EIP Panel of Inspector's matters at the examination sessions. The Inspector's report was published on 8 October 2019 and the 'Intend to Publish' version was issued on the 9 December 2019.

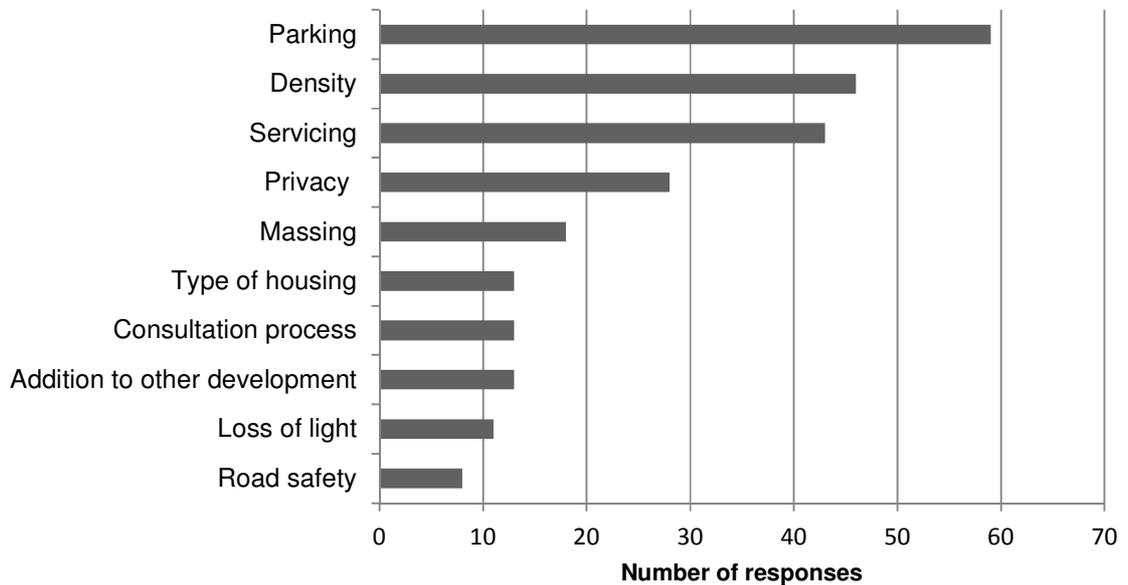
New Southwark Plan

35. For the last five years the council has been preparing the New Southwark Plan (NSP) which will replace the saved policies of the 2007 Southwark Plan and the 2011 Core Strategy. The council concluded consultation on the Proposed Submission version (Regulation 19) in February 2018 and some Amended Policies were consulted on between January and May 2019. It is anticipated that the plan will be adopted in early 2020 following an Examination in Public (EIP). As the NSP is not yet adopted policy, it can only be attributed limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.

Summary of public consultation responses

36. In order to inform those most likely to be affected by the proposed development, letters were sent and site notices were put up within the vicinity of the site. As a result, 58 comments were received (57 of those being objections).
37. On 6 December, a re-consultation letter was sent to all those who were previously consulted and those who submitted comments. The re-consultation process was initiated in order to update neighbours about material changes that were made to the proposal during the planning application process. These changes included:
1. Changed description of development (referring to 62 rather than 61 units);
 2. Site boundary changes: site now includes a land parcel immediately next to 48 Lower Road as well as the land parcel on the south corner of Ann Moss Way;
 3. Addition of 1 shared ownership unit, and changes in flat types resulting in provision of 21 x 1 bedroom, 25 x 2 bedroom and 16 x 3 bedroom units with the tenure split of 50% affordable (26% social rent and 24% shared ownership) and 50% market sale units;
 4. Revision of refuse store in Block B providing direct access from Ann Moss Way.
38. As a result of the re-consultation process, 19 objections were received thus bringing the total number of objections to 76. The most common material planning concerns expressed by neighbours have been summarised in the chart below, while all other, more bespoke or non-material concerns are set out separately.

Main concerns



39. As shown above, the majority of those who have commented on the proposal are concerned about the impact the proposed development would have on the parking availability in the vicinity of the site. Many comments have expressed concern that the proposed development would be a car-free proposal, thus not allocating space for car parking. Neighbours consider it unlikely that the new residents would not have cars, and therefore are concerned that availability of parking in the vicinity of the site would be negatively affected.
40. In addition, it is mentioned that Ann Moss Way is one the rare areas in Canada Water that is not a Controlled Parking Zone. This leads to commuters parking their cars and walking to the Canada Water underground station. As a consequence, residents struggle to find parking spaces on the street at the moment.
41. In connection to the use of the existing streets surrounding the application site, concerns are also expressed that the proposed development would result in major issues regarding servicing of the area with an increased number of trips for deliveries and more refuse to be disposed of.
42. The third main concern is that the proposal is overly large and would exceed the density guidelines for the surrounding area. In connection to this, some people have expressed that this would lead to issues of overlooking, invasion of privacy, loss of access to daylight and sunlight. Objectors considered the development not to be in keeping with established character of the area which currently is formed of houses rather than flats, and so more houses rather than flats should be built. In addition, some neighbours are concerned that the impact of this proposal is being considered separately from that arising following a proposed development at 1 Ann Moss Way.
43. Other concerns expressed include:
- Noise and disturbance created during construction process;

- Pressure additional residents would put on local services such as GP, schools and public transport;
 - Loss of trees and insufficient landscaping to make up for it;
 - Separation between the proposed development and existing residents leading to creation of a gated community;
 - Separation of future residents based on tenure type;
 - Poor quality children's play space;
 - Negative impact on property prices surrounding the site;
 - Proposal would destroy the heritage of Michael Caine's childhood home located nearby;
 - Access for fire and other emergency services;
 - Air pollution arising from demolition of existing buildings.
44. Some of the other concerns, such as impact on property prices, are not planning matters that can be considered as objections when determining the planning application.

Principle of development

45. The application site contains two buildings - a care home (C2 use class) and a temporary ambulance station (sui generis), which have been vacant since 2008.
46. While Policy 4.7 of the Southwark Plan (2007) encourages development of new non self-contained housing (such as care homes), it does not preclude change of use that would result in loss of such facilities.
47. Policy 4.6 states that 'Development will not be permitted where it results in a net loss of residential floor space'. In this particular case, while the care home would be lost, it would give way to a re-development of the site for the purpose of new, general needs residential accommodation. The state of disrepair together with prolonged vacancy suggests that the property is unlikely to be used again for the purpose as a care home. The proposal would therefore not lead to net loss of residential accommodation and the proposed construction of new residential units in C3 class use is considered acceptable in land use terms.

Density

48. The proposal would result in creation of 189 habitable rooms on a site of 0.3ha. The density of the proposed development would therefore be 630 habitable rooms per hectare.
49. The site is located within the Suburban Density Zone which means that density of development is expected to be between 200 and 350 hr/ha as set out in Core Strategy. However, it is also explained in the Core Strategy that 'within opportunity areas and action area cores the maximum densities may be exceeded when developments are of an exemplary standard of design'.
50. The application site is located within the Canada Water Action Area but outside of its core area. It has been identified as the Canada Water Opportunity Area in the draft New Southwark Plan following designation of Canada Water as an Opportunity Area in the London Plan (2016). The proposed density is acceptable despite exceeding the Suburban Density Zone's guidelines as the proposed accommodation is of an exemplary standard for the reasons set out in the 'Quality of accommodation' section of this report.

Impact of proposed development on amenity of adjoining occupiers

Daylight and sunlight

51. One of the neighbours' concerns identified during the consultation process relates to the proposal's impact on access to natural daylight and sunlight.
52. In order to inform the assessment for such impact, the applicant has submitted a daylight and sunlight impact assessment carried out by their consultant PRP in accordance with BRE Guide and BS 8206-02: Lighting for buildings - Part 2: Code of practice for daylight (2008).

Daylight

53. In order to assess the impact on existing surrounding properties, a Vertical Sky Component (VSC) test has been carried out. In the first instance, the existing VSC of neighbouring windows is established to understand how much light the windows are receiving before any new development is constructed. In accordance with the BRE Guide a window with a VSC level of 27% is considered to be well lit.
54. The proposal is then modelled in relationship with the existing windows in order to determine how much of an impact it would have. If the VSC of the neighbouring windows falls below 27% in addition to more than a 20% reduction, a further analysis of the No Sky Line has to be carried out. The No Sky Line (NSL) analysis takes into account the layout of the affected room. If the reduction is again more than 20% of the former value, the arising reduction in daylight may be noticeable by occupiers of that habitable room.
55. The particular residential properties tested in order to establish the daylight impact are as follows:

Address	VSC windows (pass)	NSL rooms (pass)	Overall
12-34 (even) Ann Moss Way	26 of 26	26 of 26	Pass
17 Ann Moss Way	2 of 6	4 of 4	Pass
19 Ann Moss Way	6 of 9	6 of 6	Pass
48 Lower Road	6 of 8	4 of 4	Pass
50 Lower Road	1 of 1	3 of 3	Pass
52 Lower Road	8 of 13	7 of 7	Pass

56. The results show that 78% of the tested windows would pass the VSC test and would not be affected by the proposed development beyond the level recommended by the BRE guidance. In some cases the proposal would have a noticeable impact on individual windows, but when light is tested in the affected rooms through the NSL test, the impact would not be noticeable because rooms are served by more than one window.
57. During application determination process some minor design changes were made to Block B, which led to a decrease in the height of its front façade. VSC results were therefore improved leading to all windows at 12-34 (even) Ann Moss Way meeting the VSC test (3

windows did not initially pass the VSC test).

58. 13 Ann Moss Way, which is a commercial building, was tested for daylight impacts even though it is a less sensitive use and does not need to be as rigorously tested as residential premises. Nevertheless, the results show that windows to circulation space would be affected, but working space would continue receiving good levels of light.
59. Similarly, the impact on the Rotherhithe Free Church was also tested and it was concluded that the impact on those windows affected would be negligible.

Sunlight

60. Probable Sunlight Hours (PSH) test establishes whether windows are receiving at least 25% PSH throughout the year with at least 5% during the winter period (21 March to 21 September). Only those properties located within 90 degrees of due south of the property are tested. If the PSH value is reduced by the proposed development by more than 20%, the impact would be noticeable.
61. The following properties were identified as those requiring analysis in terms of sunlight impact:
 - 19 Ann Moss Way;
 - 48 Lower Road;
 - 50 Lower Road;
 - 52 Lower Road.
62. Out of all 26 windows tested, only one window at 52 Lower Road was found to fall under the BRE guideline for probable sunlight hours. The results show that the impact would be felt very marginally throughout most of the year, while it would become more apparent during the winter months. However, it is also noted that the window belongs to a bedroom, which is a room less reliant on access to sunlight due to its use primarily intended for sleeping. It is therefore considered that this impact on one neighbouring room is outweighed by the benefits delivered by the scheme.

Overshadowing of amenity space

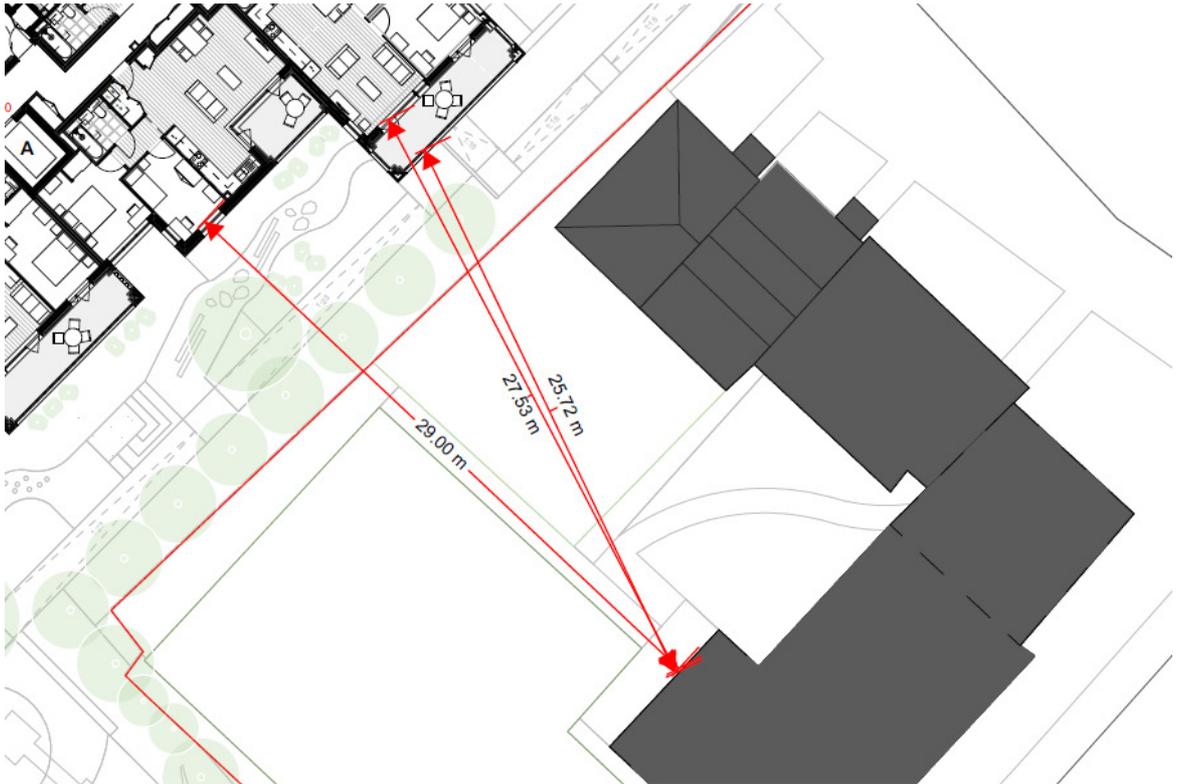
63. Lastly, 48, 50 and 52 Lower Road, as well as space belonging to Rotherhithe New Church, were tested for the potential impact arising from overshadowing of their open spaces. The results showed that all outdoor amenity spaces would continue to receive over two hours of sunlight on 21 March for more than 50% of the area, which is in accordance with BRE guidance and means that the proposal would not lead to detrimental overshadowing of surrounding open spaces.

Conclusion on daylight, sunlight and overshadowing assessment

64. In light of the above review of the submitted impact analysis, the proposal is considered to be a sensitive addition to the area, which would not cause harmful impact on the amenity of adjoining occupiers by way of reducing access to daylight, sunlight and causing overshadowing.

Outlook and privacy

65. Some adjoining residents are concerned about the impact on their privacy that may arise following construction of the proposed development. Residential Design Standards SPD contain guidelines for separation distances that should be sought in order to mitigate any overlooking that could cause privacy issues. It is suggested that 21 metres between windows should be achieved between rear elevations of buildings, and 12 metres should be achieved between front elevations (i.e. across the street).



Distance between windows – first floor level

66. Block A would be located parallel to a north-west facing wall of windows belonging to 17 and 19 Ann Moss Way (there are no windows facing the site immediately adjacent to boundary – at 48 Lower Road). At ground floor level the smallest distance between windows would be 28.4m. On upper floors the new development would have one additional flat, located slightly closer to neighbouring properties, and closest distance between those windows would be 27.5m. The distance between the neighbouring windows and the edge of the closest located balcony of the proposed development would be 25.7m, also exceeding the 21m guideline as set out in the Residential Design Standards SPD. It is therefore considered unlikely that the privacy of neighbours living at 17 and 19 Ann Moss Way would be compromised.



Distance between windows – first floor level

67. Block B would be parallel to Ann Moss Way terrace, creating direct views between existing and proposed windows. However, the distance between windows would be a minimum of 18.4m, which would comfortably exceed the guideline set out in the Residential Design Standards.



Distance between balconies and neighbouring windows – fourth floor level

68. Some of the neighbours’ objections have focused on the privacy impact on occupiers at Ann Moss Way terraced houses caused by the new occupiers overlooking the windows from the balconies at third floor level. However, the distance between the edge of the balconies would be larger than the distance between the first floor windows mentioned above, and also is in keeping with the guidelines set out in the Residential Design Standards.

Housing mix and affordable housing

The proposal is to create 62 new units, accommodated in two blocks.

Tenure split – units

	Block A	Block B	Total
Social rent	-	14	14
Shared ownership	11	6	17
Market	31	-	31
Total	42	20	62

Tenure split – habitable rooms

	Block A	Block B	Total
Social rent	-	56	56 (26%)
Shared ownership	30	22	52 (24%)
Market	106	-	106 (50%)
Total	136	78	214

69. The Draft New Southwark Plan amended policy P1 ‘Social rented and intermediate housing’ requires new development to deliver minimum 10% shared ownership and minimum 25% social rented units. The proportion is calculated based on the number of habitable rooms rather than units.
70. The proposed 62 units would contain 214 habitable rooms. 56 habitable rooms would be in social rent tenure, 52 would be shared ownership and 106 would be market tenure. The proposal would therefore deliver 24% shared ownership and 26% social rented habitable rooms, meeting the requirements of the Draft New Southwark Plan policy and providing 50% of the new units as affordable, greatly exceeding the 35% minimum requirement.
71. In addition, the market and affordable units would be in blocks of equally high quality finish and would share communal amenity space as well as the play area in the centre of development.

Housing mix

72. The two proposed blocks would contain 21 x one-bedroom, 25 x two-bedroom and 16 x three-bedroom units.
73. Strategic Policy 7 ‘Family homes’ of the Core Strategy requires at least 60% of units to contain two or more bedrooms, at least 30% of units to contain three or more bedrooms if located in a Suburban Density Zone.
74. 66% of the proposed units would contain two or more bedrooms and 26% of the units would have 3 or more bedrooms. The proposal would therefore meet the requirement for two-bedroom units while falling slightly short of the 30% requirement by 4% for three-bedroom units (equating to 3 units).
75. Even though the proposal does not meet the 30% requirement, it is noted that ten of the 16 three-bedroom units currently offered would be for social rent, which would be a significant addition to the much needed social rented family unit stock. In addition, overall the proposal would provide 50% affordable housing in a development of high design quality. In light of all the benefits the scheme would deliver, the shortfall in three-bedroom units is acceptable.

Wheelchair units

76. Policy 4.3 'Mix of dwellings' of the Southwark Plan requires 10% of major development units to be wheelchair accessible. The proposal would include 6 new wheelchair units across all 3 tenure types, thus meeting the requirements of the policy.

Quality of accommodation



Ground floor plan – Block A



Ground floor plan – Block B

77. All proposed units and individual rooms would meet the space standards set out in the Residential Design Standards SPD (2015). The range of proposed unit sizes is set out in the table below:

	Proposal (sq.m)	Requirement (sq.m)
1B2P	50.0 – 57.6	50
2B3P	61.0 – 73.3	61
2B4P	70.1 – 71.9	70
3B4P	84.9 – 106.5	74
3B5P	95.7 – 106.5	86
3B5P (maisonette)	112.5 – 123.1	93

Accessibility

78. The application site is located within Flood Zone 3. In order to mitigate the risk of flooding and protect the future occupiers from immediate danger, the floor levels have been raised. Where steps have been proposed to provide access between changing levels, an alternative sloping ramp has also been proposed in order to allow for access by wheelchair users or those with less mobility. In addition, lift access has been proposed in both blocks to enable navigation throughout the buildings. The proposed design is therefore considered to be of acceptable quality in terms of accessibility and ease of use.

Outlook and aspect

79. Block A
81% of the units in Block A would be dual aspect flats. The block is linear in nature, which allows for the corners of the building to be utilised in a way that creates dual aspect units. In order to provide more than one aspect for the units in the middle of the block, distinctive bays have been created. This has allowed for at least one window to be added in a different direction to the main windows, increasing the opportunities for natural cross ventilation and extending the time that sunlight can access the units, though outlook from these windows would be limited. Where these windows are positioned in a way that directly faces balconies of other units within the block, obscured balustrades have been provided on the side of balconies to avoid direct overlooking and offer more privacy to occupiers.
80. Block B
90% of the units within this block would be dual or triple aspect flats, which has been made possible by the slightly unusual layout of maisonettes at ground and first floor levels whereby the ground floor level is a long and linear space with windows to the northeast and southwest while the upper floors faces either the northeast or the southwest direction. Flats on the upper floors of Block B feature a shallower profile created by the access deck on one side and balconies on the other. The two single aspect flats would be 1-bedroom units facing south. As such, even though outlook from the flat would be limited to one side, the quality of accommodation in terms of access to daylight and sunlight would be very good. In addition, the two flats would have access to south –facing small inset balconies, adding to the amenity and quality of accommodation of these units.

Daylight and sunlight

81. Block A – daylight
Apart from two kitchen-dining-living spaces on the ground, first and second floors as well as one kitchen-dining-living space on the third floor, all individual rooms would meet the guidelines set out in the BRE guidance based on the Average Daylight Factor test. The kitchen-dining-living rooms that would fall below the recommended internal daylight levels would do so due to their layout which takes an L-shaped form and wraps around an inset balcony. Less natural daylight is thus balanced against provision of private outdoor amenity space, which would receive good levels of daylight and sunlight. In addition, the inset nature of balconies is likely to offer more privacy not just for their users but also to neighbours due to fewer opportunities of overlooking. The kitchen-dining-living spaces that would receive less than recommended levels of daylight, would offer the benefit of access to private outdoor space and this compromise is therefore considered acceptable.
82. Block B – daylight
Apart from one bedroom on the second floor facing northeast which would fall below the recommended level of ADF by 0.07%, all other rooms would meet the BRE guidelines. The proposed design is therefore considered to be successful in providing an overall good level of natural daylight.
83. Block A – sunlight
Majority of the units on all floors would have windows facing within 90 degrees of due south, which would ensure that good levels of sunlight would be achieved. Nevertheless, two of the flats on each level would face mostly north leading to access to sunlight that would fall below that of recommendations contained in the BRE guidance. Nevertheless, the BRE guidance

suggests that in such cases mitigation measures such as offering enhanced views from the units can be used to improve the quality of accommodation. In this case, views of the north facing flats would out onto the landscaped area and occupiers would have access to private outdoor amenity space in the form of balconies. It is recognised that these flats would not receive great levels of sunlight, but they would receive good levels of daylight as discussed above. Overall it is considered that due to the site constraints and the aim of using the land as efficiently as possible, the shortcomings of a small number of units in terms of sunlight are acceptable.

84. Block B – sunlight

Majority of the living spaces on the upper floors of Block B would face southwest which would ensure that internal sunlight levels would be acceptable. The ground floor levels of the maisonettes, however, have been designed to separate kitchens from living rooms, placing living rooms on the less sunny side facing towards north east. While the living rooms would receive less sunlight, they have been design to have direct access to private outdoor space that also looks out onto children's play area. Having been design as family homes, this layout enables families to allow their children to play outside while providing opportunities for surveillance from within the living rooms of the maisonettes. In addition, the dining space within the kitchen has been placed closest to the south facing windows and would receive good levels of sunlight, giving an opportunity of occupiers to enjoy direct sunlight within their living space if they wish to do so.

Amenity and play space

85. *Private outdoor space*

Residential Design Standards outline the requirements for provision of private outdoor amenity space for each type of flats and houses. Flats with three or more bedrooms should provide a minimum of 10 sq.m of private outdoor space. Any units containing less than three bedrooms should provide 10 sq.m of private outdoor space. Where this is not possible, the shortfall can be added to the requirement to provide 50 sq.m of communal outdoor space. To qualify as outdoor space, any balcony or terrace should be at least three sq.m large.

86. All units that contain three or more bedrooms in the proposed development would have associated private amenity space in excess of 10 sq.m. Amenity space associated with 1-bedroom and two-bedroom flats range in size from 5 to 40.9 sq.m. Overall, the proposed design thus incorporates sufficiently large private amenity space for each of the units, thus resulting in high quality accommodation.

87. *Communal outdoor space*

Communal amenity space has been identified by the developer to be the space to the southeast and east, as well as the fourth floor roof terrace of Block A. Overall the identified communal amenity space would occupy 452 sq.m of the outdoor area, which would be sufficient to meet the 50 sq.m requirement and accommodate the shortfall of private outdoor space arising in the case of the units with less than 3 bedrooms. It is noted that the planted area to the north of Block A has not been counted towards the overall amount of amenity space, since it would provide visual amenity to the north-west facing flats, but would not be used as communal amenity space

88. *Play space*

In addition to communal space, children's play space would also be provided. A part of it would be located next to the main communal area to the southeast of Block A, while the

second, and larger, part of the space would be located to the north of Block B. The overall size of play space would be 263 sq.m which falls short of the 304 sq.m requirement in accordance with the London Plan Policy 3.6 'Children and young people's play' and the Mayor's Play and Informal Recreation SPG (2012). Considering the site's proximity to Southwark Park, the shortfall of 41 sq.m is deemed minimal and acceptable on site. Nevertheless, a financial contribution would be sought to account for the shortfall and to enable improvement of access to public play areas in the locality.

89. The play space would be accessible to the public during the day time, thus enhancing opportunities for play and integrating the proposed development into the local area.

Design

Townscape context

90. The site is currently occupied by a single storey former nursing home fronting onto Lower Road and a single storey portacabin on the southern corner which fronts onto Ann Moss Way. There is also a sub-station fronting onto Ann Moss Way. In its current condition, the site does not contribute positively to the quality of the surrounding townscape.



Site context along Lower Road and in cross-section perpendicular to Ann Moss Way and Lower Road

91. Rotherhithe Evangelical Free Church, a low rise neo-classical style building, is located immediately to the north of the site. To the south, on the corner of Lower Road and Ann Moss Way is a 1980's part four, part three storeys high block of flats. Ann Moss Way at the rear of the site is a typical 1980's suburban street of low rise (two storeys) terraced houses which terminates at a cul-de-sac.
92. While existing built form on the west side of Lower Road is characterised by its low-rise form, immediately across Lower Road from the site is Blick House, a 5 storey residential block of flats, positioned perpendicularly to Lower Road and accessed along Neptune Street.

Scale and mass

93. Block A would be perpendicular to Lower Road, thus reducing the mass that would face directly onto the road. The width of Lower Road would provide sufficient separation between the site and Blick House, reducing the visual impact of the added mass along this part of the road. Approaching the site from the south, views would gradually reveal the building, which would be partially obscured by the part 3, part 4 storey corner building on Ann Moss Way, reducing its visual impact on Lower Road.
94. Block B has been designed to step down in height to three storeys closer to the more low-rise residential terrace along Ann Moss Way. At four storeys the building would still be higher than the two-storey terrace immediately opposite; however, the top floor of Block B has been set back to visually reduce the massing while still making efficient use of land and delivering more housing.

Layout and landscaping

95. Within the site, the blocks have been positioned in an L-shaped relationship which maximises the use of the site whilst avoiding direct overlooking. Linear space alongside each block is designed as landscaped outdoor amenity space as well as children's play space. The linear relationship between the buildings and outdoor space creates good opportunities for passive surveillance, likely to benefit the use of children's play area.
96. On the north side of Block A, additional landscaped area is proposed, providing visual amenity and enhancing views for the occupiers on the north-west side of the building.

Detailed design



View of Block A from Neptune Street

97. Block A

The proposed building would be four to six storeys high. Although of a different scale than immediately adjacent buildings, its height is justified by the location of the site adjacent to a major road. Its massing has been fragmented by a series of protruding bays, creating interest and reducing the overall visual bulk of the building, as well as integrating private amenity space in the form of semi-enclosed balconies



View of Block B from Ann Moss Way

98. Block B

Block B would be three to four storeys high and would front onto Ann Moss Way. Its design has a complex form which allows most units to be dual aspect and which allows it to step down to three storeys in height along Ann Moss Way. Although the block would be of different form, scale and design, it would be successful in integrating with the smaller scale of the existing Ann Moss Way buildings.

99. Both buildings would be constructed in textured combination of brick in varied shades but with an overall appearance of light grey. Metal detailing (balustrades and window frames) in a distinctive colour would add interest. The choice of materials is considered appropriate within the context, and would result in a high quality finish. Nevertheless, a condition to secure further details about the proposed materials is recommended.

100. Overall it is considered that the proposal would result in the construction of well-proportioned, appropriately detailed buildings that are a successful response to the constraints of the site and that would be a positive addition to the existing urban environment along Lower Road and Ann Moss Way.

Transport and highways

Car parking

101. The application site is located within an area with a Public Transport Accessibility Level (PTAL) of 4, which indicates that there is good access to public transport in the area. The site is not located in a Controlled Parking Zone (CPZ), though a large CPZ covers the area immediately on the other side of Lower Road.
102. The proposed development would be car free except for two on-site disabled car parking spaces. These spaces would be accessed directly from Ann Moss Way.
103. A transport statement has been submitted with the application. It contains a parking survey together with a trip generation study in order to establish how the development would affect parking availability in the immediate area.
104. The parking survey has been carried in accordance with the guidance of the Lambeth Methodology. It covers an area within 200m radius of the site and includes findings from two weekdays (Thursday and Friday) based on a survey done at 0040 and 0430 respectively.
105. One of the main concerns raised by adjoining residents relates to the impact the proposed development would have on parking availability in the area, considering that parking is not controlled and that, according to residents, it is already very difficult to find an available parking space.
106. The parking stress survey shows that, during the days of the survey, most parking spaces along Ann Moss Way were indeed occupied. However, it is also noted that majority of the houses that are located closest to the site benefit from off-street parking. The majority of neighbours are therefore unlikely to be significantly affected because they would continue having access to their personal parking space.
107. Ann Moss Way is within the area covered by the Rotherhithe Movement plan that includes projects to improve the transport network in the area. Introduction of a CPZ to Ann Moss Way is one of the future projects, subject to results of a local consultation. It is understood that a consultation process is likely to start in March 2020, which then may lead to introduction of a CPZ to Ann Moss Way. In light of this information, and to address neighbours' concerns about the impact of proposed development on parking availability in the area, it is recommended to include a clause in the S106 agreement that would preclude the future occupiers of the proposed development to apply for parking permits if the CPZ is introduced.

Cycle parking

108. A total of 176 cycle parking spaces would be provided in the form of two-tier cycle racks within a cycle store on the southwest corner of the development. This would exceed the requirements of the New Southwark Plan and the New London Plan.
109. However, the type of cycle storage proposed would be two tier rack, which is not the most accessible way of storing a bike. A condition is therefore recommended to request details of an amended cycle storage space configuration, which replaces some of the two tier racks with Sheffield stands, which would provide a more accessible opportunity for storing some of

the bikes.

Servicing

110. *Refuse collection*

The refuse storage area for both buildings is located within Block B, on the southwest corner of the site, and would be directly accessible from Ann Moss Way. The refuse collection would therefore take place directly from within the store, by collectors being able to wheel the bins out of it and back in without the necessity to leave them on the street. This is an arrangement arrived at following the public consultation process and in response to concerns raised by neighbours about the initially proposed approach of leaving the bins on the pavement on the day of collection. This arrangement is considered acceptable as it would avoid the environmental nuisance related to bins left of the street.

111. *Deliveries*

Deliveries or any other servicing will also take place from Ann Moss Way because parking or stopping of vehicles nearby the site is not allowed on the Lower Road side due to double yellow lines as well as a bus stop that is located immediately outside the site. While this would result in some additional vehicular movement along Ann Moss Way, the small number of deliveries is not expected to cause significant disruption to the use of the road. Furthermore, it is proposed to re-locate two of the on-street parking spaces outside of what would become the delivery and servicing point at Block B to the area which is currently designated as an entrance to the ambulance site. The existing dropped kerb would be reinstated and 'Keep Clear' marking would be removed.

112. *Works to the highway*

If permission is granted for the proposed development, the applicant will be required to enter into a S278 agreement with the Highway Authority and carry out the following works which are required to enable the proposed use:

- Repave the footways including new kerbing fronting the development on Lower Road and Ann Moss Way using materials in accordance with Southwark's Streetscape Design Manual;
- Construct vehicle crossover on Ann Moss Way to current SSDM standards;
- Remove the two redundant "keep clear" markings outside the previously used emergency access on Ann Moss Way and reinstall two parking spaces;
- Introduce a length of double yellow lines south east of the vehicle crossing on Ann Moss Way to facilitate loading/unloading;
- Reinststate the redundant crossover on Ann Moss Way as footway;
- Promote a traffic management order to amend the parking restrictions within the vicinity of the site;
- Repair any damages to the highway within the vicinity of the site due to construction activities.

Sustainable development implications

113. An energy statement has been submitted with the application setting out the 'Be Lean, Be Clean, Be Green' hierarchy of establishing the carbon emissions' footprint and reducing it as much as possible in accordance with Policy 5.2 of the London Plan.

114. The statement shows that energy efficiency measures such as lighting and heating controls as well as use of more energy efficient materials in construction would help deliver 15.3% savings in the 'Be Lean' category.
115. Possibilities to connect to an existing district heating network have been considered as part of the 'Be Clean' category. A district heating network has not yet been established, but the site is located within the strategic district heating area and so is required to be future proofed and design for connection to the network in the future, in accordance with the Canada Water Area Action Plan. Measures such as providing space for future installation of Plate Heat Exchangers and provision for capped flow and return connection in the energy centre have been provided to meet the requirement of the action plan.
116. Finally, to meet the requirements of the 'Be Green' Category, the proposal includes installation of 192 monocrystalline photovoltaic panels on the roofs of the buildings, which would achieve 39.7% carbon dioxide savings.
117. In total, 55% on-site savings of carbon emissions would be secured through the proposed design, which is in accordance with the London Plan requirement to achieve the minimum of 35% savings on the site. The policy ultimately requires all residential development eliminate all carbon emissions, thus to make up for the shortfall of 45%, the applicant is required to pay a financial contribution of £61,020.00 to enable further carbon dioxide reduction projects to take place in Southwark.

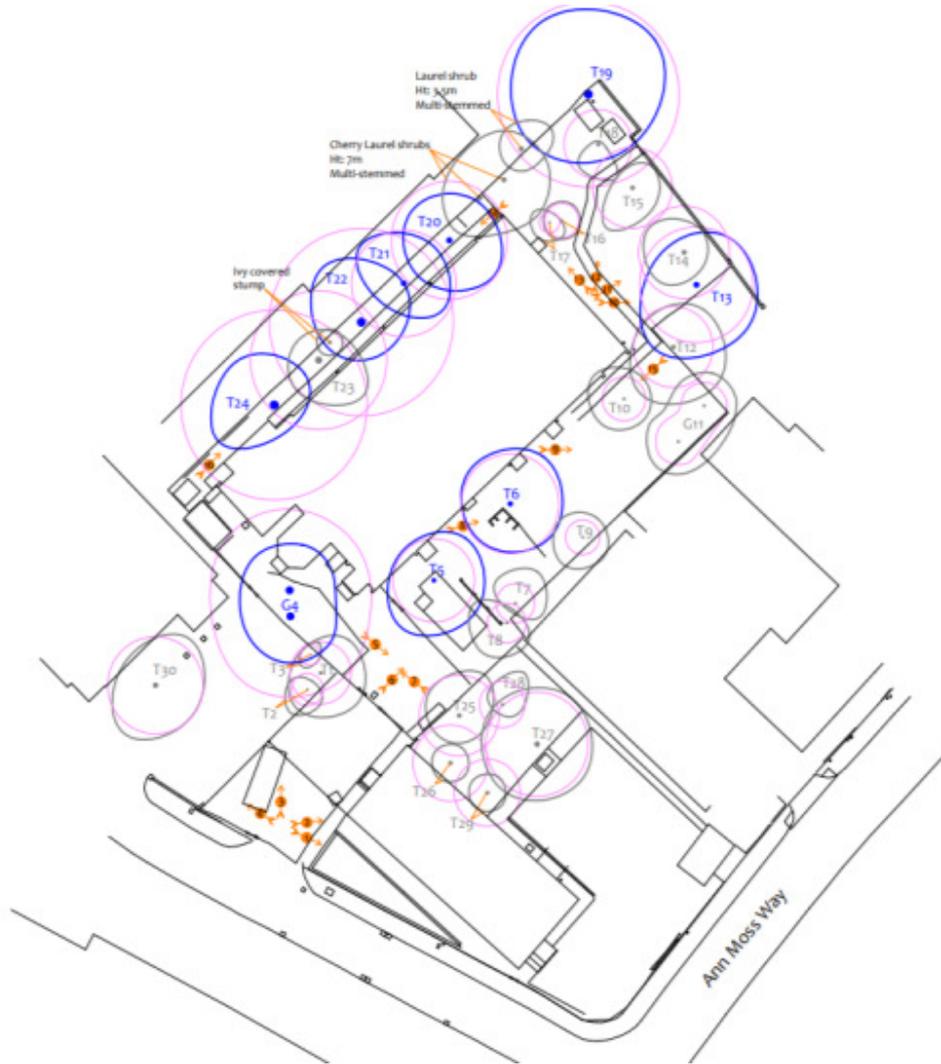
Other matters

Ecology

118. An ecological appraisal as well as a bat survey has been submitted with the application. In light of the submitted information, it is considered that the proposed development is unlikely to have a negative impact on the existing ecology of the site and its surrounding area, and has the potential to result in ecological gain and improvements by providing bird and bat nesting facilities as well as green roofs and appropriate landscaping. Conditions requesting further details of these ecological improvement measures are recommended.

Trees

119. The application site is not located in a conservation area and none of the trees currently located within the site are protected by a tree protection order. The proposed works will lead to loss of some of the existing trees. A tree survey and impact assessment has been submitted with the application to establish the current context and recommend any mitigation works that may be required due to the loss of trees and to protect any retained trees during construction.



Tree survey

120. Four Category B trees (G4, T5, T6, T13) and fourteen small, low quality Category C trees (T1, T3, T7, T8, T9, T10, G11, T12, T14, T15, T16, T17, T18, T23) would be removed to make way for the proposed development. Minor pruning is proposed to be carried out on four retained trees (T2, T19, T20 and T22), and replacement of hard surface with soft surface around root protection areas would take place in relation to four trees (T20, T21, T22, T24). Foundations are proposed within the Root Protection Area of three trees (T19, T22, T24), however, the foundation design is unlikely to cause harm to the trees.
121. The proposed landscaping strategy includes planting of 28 new trees, partially mitigating the loss of some of the existing trees, but still resulting in the net loss of 1316cm stem girth. The loss of identified trees is acceptable, as long as a financial contribution of £19,605 is made to enable new tree planning in the vicinity of the site.

Flood Risk

122. The application site is located in Flood Risk Zone 3 and an area benefitting from flood defences. Whilst the site is protected by the River Thames tidal flood defences up to a 1 in 1000 (0.1%) chance of flooding in any year, the most recent flood modelling (December 2017) shows that the site is at risk if there was to be a breach in the Thames Barrier defences.
123. A flood risk assessment has been submitted to account for the risk and suggest any mitigation measures that could be put in place. One of the measures is raising the finished floor levels to 3.72m above AOD for Block A and 2.35m above AOD for Block B. This measure is recognised as acceptable by the Environmental Agency as well as the council's Flood and Drainage team. A condition is recommended to ensure that finished floor levels for the ground floor of Block A are not lowered below 3.72m AOD and the first floor level of Block B (where sleeping accommodation is proposed) is not lower than 5.38m AOD.
124. A drainage strategy has been submitted to inform how any surface water management would take place. An attenuation tank has been proposed as part of the drainage plan, while other possible measures recommended in the FRA have not been adopted. A condition is therefore recommended to request submission of a more detailed drainage strategy that would take into account the recommended sustainable drainage measures such as green roofs, rain gardens and rainwater harvest facilities.

Secured by design

125. Following consultation with local residents who raised concerns about the new development being secluded from the surrounding area, the applicant has offered to amend the proposal by providing public access from Lower Road to the play area during the day. The entrance gate would be locked in the evening at which time only residents of the new development would have access into the property. A condition is recommended to request further details about the management of access into the site as well as specification of boundary treatment, including the access gate.

Land contamination

126. Council's environmental protection team have reviewed the proposal and have not requested any further information regarding land contamination, nor have any conditions been recommended.

Air quality

127. An air quality assessment has been submitted with the application to assess the impact on existing adjoining occupiers arising from construction of the proposed development as well as the quality of access to clean air for the future occupiers of the two buildings.
128. Modelling results show that mitigation measures during the construction process will be required to make sure that the impact is reduced to negligible. A construction management plan would be required to be submitted and assessed not only for demolition but also for construction of the proposal. The construction management plan would take into account the air quality mitigation measures recommended in the submitted report.
129. Some of the flats with windows at ground and first floor levels facing Lower Road are more likely to experience higher levels of nitrogen dioxide, which can have an adverse impact on

health. As such, mitigation measures would have to be introduced. Environmental Protection Team have recommended a condition that would require the applicant to submit full details of internal ventilation that would help ensure intake of clean air in flats where opening windows onto Lower Road would not be recommended.

130. Lastly, the proposal would meet the building and transport emission benchmarks in order to meet the air quality neutral nature of major development as required by Policy 7.14 of the London Plan.

Construction management

131. Due to the scale and location of development, a condition is recommended to require the applicant to submit a construction and environmental management plan prior to commencement of any works on site.

CIL

132. The proposal is liable for Mayoral and Southwark CIL. The party responsible to pay CIL must submit CIL Form 1 (Assumption of Liability) and CIL Form6 (Commencement Notice) at least a day prior to material operations start on site.

Planning obligations (S.106 undertaking or agreement)

133. The required obligations and contributions would be secured through a S106 legal agreement within the council:
- Provision as well as monitoring of affordable housing;
 - Play space contribution of £6,191.00;
 - Employment During Construction provisions;
 - S278 agreement under the Highways Act;
 - Contributing to process the Traffic Regulation Order to provide a double yellow line restriction over a two-car length of the kerbside;
 - Carbon offset payment of £61,020.00;
 - Car Club Membership (3 years) for residents;
 - Considerate Construction Scheme;
 - Legal fees;
 - Contribution towards the feasibility study to establish an appropriateness of implementing a CPZ and if the study confirms that a CPZ would be appropriate, contribution towards the CPZ implementation).

134. In the event that a satisfactory legal agreement has not been entered into by 15 May 2020 it is recommended that the director of planning be authorised to refuse planning permission, if appropriate, for the following reason:

The proposal, by failing to secure appropriate planning obligations through the completion of a S106 agreement fails to ensure the delivery of affordable housing, secure highway works to mitigate the impacts of development, provide a carbon offset payment as well as other financial contributions that make the proposal acceptable in accordance with saved policy 2.5 of the Southwark Plan 2007, strategic policy 14 of the Core Strategy and policy 8.2 of the London Plan, and the Planning Obligations and Community Infrastructure Levy SPD 2015.

Conclusion on planning issues

135. In light of the above, the proposal is considered acceptable as it would create two new residential blocks in an area which is predominantly residential in nature. The proposal itself would be of high design as well as internal accommodation quality, and it is also considered unlikely that it would cause any significant detrimental impact on the amenity of surrounding occupiers. The transport impact has been considered in light of a parking survey and modelling study as well as a servicing strategy, and is concluded that the impact is acceptable in light of the benefits of creating 62 new residential units, of which 50% would be affordable housing. Overall it is therefore considered that the proposal would utilise a disused plot of land, making efficient use of it by providing a much needed new residential development of high quality.

Consultations

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

Consultation replies

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

Community impact statement / Equalities Assessment

138. 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.
139. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

140. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights
141. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.

Human rights implications

142. 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.
143. This application has the legitimate aim of providing 62 residential dwellings. 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: 540-15 Application file: 19/AP/1612 Southwark Local Development Framework and Development Plan Documents	Place and Wellbeing Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 7708 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation
Appendix 2	Recommendation

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Lasma Putrina, Planning Officer	
Version	Final	
Dated	23 January 2020	
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		23 January 2020

CONSULTATION

CONSULTATION UNDERTAKEN

Notices:

- Site Notice: • A Site Notice was displayed on 05/07/2019
- Press Notice: • A Press Notice was published on 27/06/2019

Consultation Letters to Neighbours and Local Groups:

Recipient Address:

Response rc'd:

• 7 Ann Moss Way, London, SE16 2TL	
• 7 Ann Moss Way, London, SE16 2TL	
• 11 Ann Moss Way, London, SE16 2TL	
• 11 Ann Moss Way, London, SE16 2TL	
• Nursing Development Team, Ann Moss Way, London	
• Nursing Development Team, Ann Moss Way, London	
• First Floor Flat, 54-64 Culling Road, London	
• First Floor Flat, 54-64 Culling Road, London	
• 5 Ann Moss Way, London, SE16 2TL	
• 5 Ann Moss Way, London, SE16 2TL	
• 36 Ann Moss Way, London, SE16 2TL	
• 36 Ann Moss Way, London, SE16 2TL	
• 34 Ann Moss Way, London, SE16 2TL	
• 34 Ann Moss Way, London, SE16 2TL	
• 38 Ann Moss Way, London, SE16 2TL	
• 38 Ann Moss Way, London, SE16 2TL	
• 3 Ann Moss Way, London, SE16 2TL	25.07.2019
• 3 Ann Moss Way, London, SE16 2TL	
• 40 Ann Moss Way, London, SE16 2TL	
• 40 Ann Moss Way, London, SE16 2TL	
• 128 Ann Moss Way, London, SE16 2TJ	25.07.2019
• 128 Ann Moss Way, London, SE16 2TJ	20.12.2019
• 50 Ann Moss Way, London, SE16 2TL	25.07.2019
• 50 Ann Moss Way, London, SE16 2TL	
• 110 Ann Moss Way, London, SE16 2TJ	25.07.2019
• 110 Ann Moss Way, London, SE16 2TJ	
• 53 Ann Moss Way, Rotherhithe, London	25.07.2019
• 53 Ann Moss Way, Rotherhithe, London	
• 110 Ann Moss Way, London, SE16 2TJ	25.07.2019
• 110 Ann Moss Way, London, SE16 2TJ	
• 27 Eric Avenue, Emmer Green, Reading	25.07.2019
• 27 Eric Avenue, Emmer Green, Reading	
• 26 Ann Moss Way, London, SE16 2TL	26.07.2019
• 26 Ann Moss Way, London, SE16 2TL	
• 51 Ann Moss Way, Southwark, London	26.07.2019
• 51 Ann Moss Way, Southwark, London	
• 81 Ann Moss Way, London, SE16 2TJ	26.07.2019
• 81 Ann Moss Way, London, SE16 2TJ	
• 5 Bridge Wharf, 156 Caledonian Road, London	26.07.2019
• 5 Bridge Wharf, 156 Caledonian Road, London	
• 81 Ann Moss Way, London, SE16 2TJ	26.07.2019
• 81 Ann Moss Way, London, SE16 2TJ	
• 66 Ann Moss Way, London, SE16 2TL	26.07.2019
• 66 Ann Moss Way, London, SE16 2TL	
• 26 Ann Moss Way, London, SE16 2TL	25.07.2019
• 26 Ann Moss Way, London, SE16 2TL	
• 24 Ann Moss Way, London, SE16 2TL	26.07.2019
• 24 Ann Moss Way, London, SE16 2TL	
• 28 Ann Moss Way, London, SE16 2TL	26.07.2019
• 28 Ann Moss Way, London, SE16 2TL	
• 32 Ann Moss Way, London, SE16 2TL	
• 32 Ann Moss Way, London, SE16 2TL	
• 30 Ann Moss Way, London, SE16 2TL	24.07.2019

• 30 Ann Moss Way, London, SE16 2TL	16.12.2019
• 22 Ann Moss Way, London, SE16 2TL	26.07.2019
• 22 Ann Moss Way, London, SE16 2TL	
• 14 Ann Moss Way, London, SE16 2TL	
• 14 Ann Moss Way, London, SE16 2TL	
• 12 Ann Moss Way, London, SE16 2TL	
• 12 Ann Moss Way, London, SE16 2TL	
• 16 Ann Moss Way, London, SE16 2TL	
• 16 Ann Moss Way, London, SE16 2TL	
• 20 Ann Moss Way, London, SE16 2TL	24.07.2019
• 20 Ann Moss Way, London, SE16 2TL	
• 18 Ann Moss Way, London, SE16 2TL	24.07.2019
• 18 Ann Moss Way, London, SE16 2TL	
• 9 Ann Moss Way, London, SE16 2TL	25.07.2019
• 9 Ann Moss Way, London, SE16 2TL	06.12.2019
• 10 Ann Moss Way, London, SE16 2TL	
• 10 Ann Moss Way, London, SE16 2TL	
• Flat 1, 52 Lower Road, London	
• Flat 1, 52 Lower Road, London	
• 50 Lower Road, London, SE16 2TP	
• 50 Lower Road, London, SE16 2TP	
• Flat 2, 52 Lower Road, London	
• Flat 2, 52 Lower Road, London	
• Flat 4, 52 Lower Road, London	
• Flat 4, 52 Lower Road, London	
• Flat 3, 52 Lower Road, London	
• Flat 3, 52 Lower Road, London	
• 48 Lower Road, London, SE16 2TP	
• 48 Lower Road, London, SE16 2TP	
• St Olaves Nursing Home, Ann Moss Way, London	
• St Olaves Nursing Home, Ann Moss Way, London	
• Rotherhithe Ambulance Station, Ann Moss Way, London	
• Rotherhithe Ambulance Station, Ann Moss Way, London	
• Gate House, Ann Moss Way, London	
• Gate House, Ann Moss Way, London	
• 29 Ann Moss Way, London, SE16 2TJ	26.07.2019
• 29 Ann Moss Way, London, SE16 2TJ	20.12.2019
• 25 Ann Moss Way, London, SE16 2TH	26.07.2019
• 25 Ann Moss Way, London, SE16 2TH	
• Flat 2, 19 Ann Moss Way, London	
• Flat 2, 19 Ann Moss Way, London	
• Flat 1, 19 Ann Moss Way, London	
• Flat 1, 19 Ann Moss Way, London	
• Flat 3, 19 Ann Moss Way, London	
• Flat 3, 19 Ann Moss Way, London	
• The Chaucer Community Resource Centre, 13 Ann Moss Way, London	
• The Chaucer Community Resource Centre, 13 Ann Moss Way, London	
• 52 Culling Road, London, SE16 2TN	
• 52 Culling Road, London, SE16 2TN	
• Flat 3, 17 Ann Moss Way, London	
• Flat 3, 17 Ann Moss Way, London	
• Flat 6, 52 Lower Road, London	
• Flat 6, 52 Lower Road, London	
• Flat 5, 52 Lower Road, London	
• Flat 5, 52 Lower Road, London	
• Flat 7, 52 Lower Road, London	

- Flat 7, 52 Lower Road, London
- Flat 2, 17 Ann Moss Way, London
- Flat 2, 17 Ann Moss Way, London
- Flat 1, 17 Ann Moss Way, London
- Flat 1, 17 Ann Moss Way, London
- 28 Ann Moss Way, 28, London 24.07.2019
- 28 Ann Moss Way, 28, London
- 62 Ann Moss Way, London, SE16 2TL 24.07.2019
- 62 Ann Moss Way, London, SE16 2TL
- 35, Ann Moss Way, London 24.07.2019
- 35, Ann Moss Way, London
- 59 Ann Moss Way, London, SE16 2TJ 24.07.2019
- 59 Ann Moss Way, London, SE16 2TJ
- 35 Ann Moss Way, Surrey Quays, London 24.07.2019
- 35 Ann Moss Way, Surrey Quays, London
- 56 Ann Moss Way, London, SE16 2TL 24.07.2019
- 56 Ann Moss Way, London, SE16 2TL
- 52 Ann Moss Way, London, SE162TL 24.07.2019
- 52 Ann Moss Way, London, SE162TL
- 6 Ann Moss Way, London, SE16 2TL 24.07.2019
- 6 Ann Moss Way, London, SE16 2TL
- 91, Ann Moss Way, London 24.07.2019
- 91, Ann Moss Way, London
- 18, Ann Moss Way, London 25.07.2019
- 18, Ann Moss Way, London
- 78 Ann Moss Way, Canada Water, SE16 2TL 25.07.2019
- 78 Ann Moss Way, Canada Water, SE16 2TL
- 87 Ann Moss Way, London, SE16 2TA 25.07.2019
- 87 Ann Moss Way, London, SE16 2TA
- 77 Ann Moss Way, London, SE16 2TJ 25.07.2019
- 77 Ann Moss Way, London, SE16 2TJ 19.12.2019
- 46 Ann Moss Way, London, SE16 2TL 25.07.2019
- 46 Ann Moss Way, London, SE16 2TL 13.12.2019
- 48 Ann Moss Way, London, SE16 2TL 25.07.2019
- 48 Ann Moss Way, London, SE16 2TL
- 88 Ann Moss Way, London, SE16 2TL 25.07.2019
- 88 Ann Moss Way, London, SE16 2TL
- 68 Ann Moss Way, London, SE16 2TL 28.07.2019
- 68 Ann Moss Way, London, SE16 2TL
- 29 Ann Moss Way, London, SE16 2TJ 26.07.2019
- 29 Ann Moss Way, London, SE16 2TJ
- 29 Ann Moss Way, London, SE16 2TJ 26.07.2019
- 29 Ann Moss Way, London, SE16 2TJ
- The Gate House, Ann Moss Way, London, SE16 2TL 26.07.2019
- The Gate House, Ann Moss Way, London, SE16 2TL
- 108 Ann Moss Way, London, SE16 2TJ 26.07.2019
- 108 Ann Moss Way, London, SE16 2TJ
- 59 Ann Moss Way, London, SE16 2TJ 26.07.2019
- 59 Ann Moss Way, London, SE16 2TJ
- 59 Ann Moss Way, London, SE16 2TJ 26.07.2019
- 59 Ann Moss Way, London, SE16 2TJ
- 59 Ann Moss Way, London, SE16 2TJ 26.07.2019
- 59 Ann Moss Way, London, SE16 2TJ
- Flat F, 2 Ann Moss Way, London 26.07.2019
- Flat F, 2 Ann Moss Way, London

- 56 Ann Moss Way, London, SE16 2TL 26.07.2019
- 56 Ann Moss Way, London, SE16 2TL
- 57 Ann Moss Way, Rotherhithe, SE16 2TJ 26.07.2019
- 57 Ann Moss Way, Rotherhithe, SE16 2TJ
- 70 Ann Moss Way, Rotherhithe, London 26.07.2019
- 70 Ann Moss Way, Rotherhithe, London
- Flat B, 2 Ann Moss Way, London 27.07.2019
- Flat B, 2 Ann Moss Way, London
- 11 Garden Road, Bromley, BR1 3LU 27.07.2019
- 11 Garden Road, Bromley, BR1 3LU 20.12.2019
-
- 100 Ann Moss Way, London, SE16 2TJ 27.07.2019
- 100 Ann Moss Way, London, SE16 2TJ
- Flat 65 Sirius House, Seafarer Way, London 27.07.2019
- Flat 65 Sirius House, Seafarer Way, London
- 72 Ann Moss Way, London, SE16 2TL 29.07.2019
- 72 Ann Moss Way, London, SE16 2TL
- 50 Lower Road, London, Southwark 19.12.2019
- 26 Toronto House, Surrey Quays Road, London

Re-consultation Letters to Neighbours and Local Groups:

Recipient Address:

Date Letter Sent:

- 7 Ann Moss Way, London, SE16 2TL
- 11 Ann Moss Way, London, SE16 2TL
- Nursing Development Team, Ann Moss Way, London
- First Floor Flat, 54-64 Culling Road, London
- 5 Ann Moss Way, London, SE16 2TL
- 36 Ann Moss Way, London, SE16 2TL
- 34 Ann Moss Way, London, SE16 2TL
- 38 Ann Moss Way, London, SE16 2TL
- 3 Ann Moss Way, London, SE16 2TL
- 40 Ann Moss Way, London, SE16 2TL
- 128 Ann Moss Way, London, SE16 2TJ 20.12.2019
- 50 Ann Moss Way, London, SE16 2TL
- 110 Ann Moss Way, London, SE16 2TJ
- 53 Ann Moss Way, Rotherhithe, London
- 110 Ann Moss Way, London, SE16 2TJ
- 27 Eric Avenue, Emmer Green, Reading
- 26 Ann Moss Way, London, SE16 2TL
- 51 Ann Moss Way, Southwark, London
- 81 Ann Moss Way, London, SE16 2TJ
- 5 Bridge Wharf, 156 Caledonian Road, London
- 81 Ann Moss Way, London, SE16 2TJ
- 66 Ann Moss Way, London, SE16 2TL
- 26 Ann Moss Way, London, SE16 2TL
- 24 Ann Moss Way, London, SE16 2TL
- 28 Ann Moss Way, London, SE16 2TL
- 32 Ann Moss Way, London, SE16 2TL
- 30 Ann Moss Way, London, SE16 2TL 16.12.2019

- 22 Ann Moss Way, London, SE16 2TL
 - 14 Ann Moss Way, London, SE16 2TL
 - 12 Ann Moss Way, London, SE16 2TL
 - 16 Ann Moss Way, London, SE16 2TL
 - 20 Ann Moss Way, London, SE16 2TL
 - 18 Ann Moss Way, London, SE16 2TL
 - 9 Ann Moss Way, London, SE16 2TL
 - 10 Ann Moss Way, London, SE16 2TL
 - Flat 1, 52 Lower Road, London
 - 50 Lower Road, London, SE16 2TP
 - Flat 2, 52 Lower Road, London
 - Flat 4, 52 Lower Road, London
 - Flat 3, 52 Lower Road, London
 - 48 Lower Road, London, SE16 2TP
 - St Olaves Nursing Home, Ann Moss Way, London
 - Rotherhithe Ambulance Station, Ann Moss Way, London
 - Gate House, Ann Moss Way, London
 - 29 Ann Moss Way, London, SE16 2TJ
 - 25 Ann Moss Way, London, SE16 2TH
 - Flat 2, 19 Ann Moss Way, London
 - Flat 1, 19 Ann Moss Way, London
 - Flat 3, 19 Ann Moss Way, London
 - The Chaucer Community Resource Centre, 13 Ann Moss Way, London
 - 52 Culling Road, London, SE16 2TN
 - Flat 3, 17 Ann Moss Way, London
 - Flat 6, 52 Lower Road, London
 - Flat 5, 52 Lower Road, London
 - Flat 7, 52 Lower Road, London
 - Flat 2, 17 Ann Moss Way, London
 - Flat 1, 17 Ann Moss Way, London
 - 28 Ann Moss Way, 28, London
 - 62 Ann Moss Way, London, SE16 2TL
 - 35, Ann Moss Way, London
 - 59 Ann Moss Way, London, SE16 2TJ
 - 35 Ann Moss Way, Surrey Quays, London
 - 56 Ann Moss Way, London, SE16 2TL
 - 52 Ann Moss Way, London, SE16 2TL
 - 6 Ann Moss Way, London, SE16 2TL
 - 91, Ann Moss Way, London
 - 18, Ann Moss Way, London
 - 78 Ann Moss Way, Canada Water, SE16 2TL
 - 87 Ann Moss Way, London, SE16 2TA
 - 77 Ann Moss Way, London, SE16 2TJ
- 06.12.2019
- 20.12.2019
- 19.12.2019

- 46 Ann Moss Way, London, SE16 2TL 13.12.2019
- 48 Ann Moss Way, London, SE16 2TL
- 88 Ann Moss Way, London, SE16 2TL
- 68 Ann Moss Way, London, SE16 2TL
- 29 Ann Moss Way, London, SE16 2TJ
- 29 Ann Moss Way, London, SE16 2TJ
- The Gate House, Ann Moss Way, London, SE16 2TL
- 108 Ann Moss Way, London, SE16 2TJ
- 59 Ann Moss Way, London, SE16 2TJ
- 59 Ann Moss Way, London, SE16 2TJ
- 59 Ann Moss Way, London, SE16 2TJ
- Flat F, 2 Ann Moss Way, London
- 56 Ann Moss Way, London, SE16 2TL
- 57 Ann Moss Way, Rotherhithe, SE16 2TJ
- 70 Ann Moss Way, Rotherhithe, London
- Flat B, 2 Ann Moss Way, London
- 11 Garden Road, Bromley, BR1 3LU 20.12.2019
- 100 Ann Moss Way, London, SE16 2TJ
- Flat 65 Sirius House, Seafarer Way, London
- 72 Ann Moss Way, London, SE16 2TL
- 50 Lower Road, London, Southwark 19.12.2019
- 26 Toronto House, Surrey Quays Road, London

Consultation Letters to Internal Consultees:

No consultation was carried out with internal consultees.

<u>Name of Internal Consultee:</u>	<u>Date Letter Sent:</u>	<u>Reply Received?</u>
• Design and Conservation Team [Formal]	05.12.2019	No
• Ecology	05.12.2019	YES
• Highways Development and Management	05.12.2019	YES
• Flood Risk Management & Urban Drainage	05.12.2019	No
• Urban Forester	05.12.2019	YES
• Waste Management	05.12.2019	No

Consultation Letters to External Consultees:

No consultation was carried out with external consultees.

<u>Name of External Consultee:</u>	<u>Date Letter Sent:</u>	<u>Reply Received?</u>
• EDF Energy	05.12.2019	No
• Environment Agency	05.12.2019	No
• London Fire & Emergency Planning Authority	05.12.2019	No
• Natural England - London & South East Region	05.12.2019	No
• Metropolitan Police Service (Designing Out Crime)	05.12.2019	No
• Transport for London	05.12.2019	No
• Thames Water	05.12.2019	No

SITE VISIT	
Case officer site visit date:	05.07.2019