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Item No. 6.1	Classification: Open	Date: 24 March 2020	Meeting Name: Planning Committee
Report title:	<p>Development Management planning application: Application 18/AP/2497 for: FULL PLANNING APPLICATION</p> <p>Address: 79-161 ILBERTON ROAD, LONDON SE16 3JZ</p> <p>Proposal:</p> <p>Redevelopment of 79-161 Ilderton Road to provide two separate buildings, a north building and a south building separated by a publicly accessible children's playspace.</p> <p>The erection of a north building to include a part 5, part 6, part 16 and part 28 storey development (93.350m AOD max).</p> <p>The erection of a south building to include a part 3, part 5, part 8, part 13 storey development (49.275m AOD max).</p> <p>To deliver a total of 312 residential units, 448.6sqm GIA of retail floorspace (Use Class A1); 1,817.98sqm GIA of commercial floorspace (Use Class B1) and associated basement provision, disabled parking, cycle parking, children's playspace, public realm improvements and landscaping.</p> <p>This application represents a departure from strategic policy 10 'Jobs and Businesses' of the Core Strategy (2011) and Saved Policy 1.2 'Strategic and Local Preferred Industrial Locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a Preferred Industrial Location.</p>		
Ward(s) or groups affected:	Old Kent Road		
From:	Director of Planning		
Application Start Date 14/08/2018		Application Expiry Date 13/11/2018	
Earliest Decision Date 03/10/2018			

RECOMMENDATION

1. That planning permission be granted, subject to conditions and referral to the Mayor of London and the applicant entering into an appropriate legal agreement by no later than 23 December 2020.
2. In the event that the requirements of (a) are not met by 23 December 2020 that the director of planning be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 372 of this report.

EXECUTIVE SUMMARY

Site



Existing land use (paragraph 49)

Vacant, Sui Generis

Proposed Development (paragraphs 9-21)



- 312 homes;
- 448.60 sqm GIA of A1 retail floorspace;
- 1817.98sqm GIA of B1 commercial floorspace;
- 35.61% Affordable (Social 25.47%, Intermediate 10.14%);
- 12% affordable workspace;
- All private, communal and play space requirements met on site;
- 547sqm of communal amenity provision;
- 1,377sqm of children's play provision;
- 434sqm public open space provision with £230,830 S106 off set payment. A possible use for this would be to repave the asphalt pavement on the other side of Ilderton Road to include tree planting which would help to reduce air and noise pollution, achieve greenfield run off rates, and encourage habitat creation;
- Four internal children's and communal amenity rooms provided in addition, totalling 256.4sqm;
- No car parking other than two wheelchair parking spaces;
- 596 cycle parking spaces and 62 visitor cycle parking spaces (New London Plan and New Southwark Plan compliant);
- 266 of 312 homes are dual aspect equating to 85.26% of the overall units;
- 95.24% of affordable housing units as dual aspect (80 of 84 units);
- Buildings of up to 28 storeys in height;
- Estimated Community Infrastructure Levy of circa £6,398,085.32 net of relief.

Current site looking north

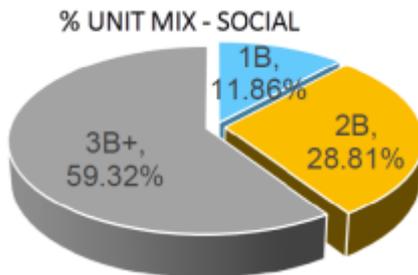


Proposed site Corner of Zampa Road and Ilderton Road



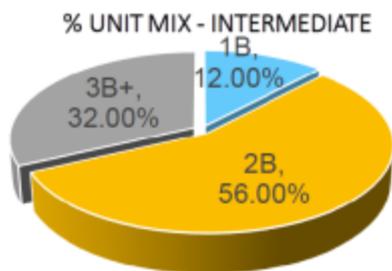
Affordable Housing (paragraphs 80-98)

Unit mix – Social



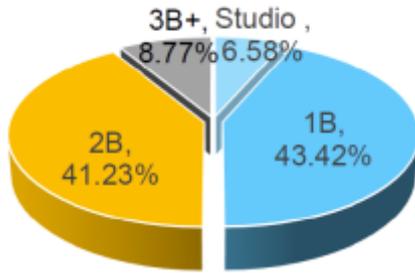
Unit size	1 bed	2 bed	3 bed	4 bed	Total
Social rent	7	17	33	2	59

Unit mix – Intermediate



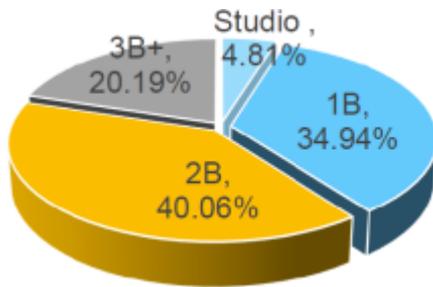
Unit size	1 bed	2 bed	3 bed	4 bed	Total
Intermediate	3	14	8	0	25

Unit mix – Private



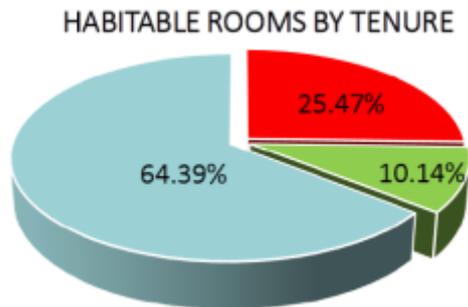
Unit size	Studio	1 bed	2 bed	3 bed	Total
Private	15	99	94	20	228

Total unit mix



Unit size	Studio	1 bed	2 bed	3 bed
TOTAL No (312).	15	109	125	63
TOTAL %	4.81%	34.94%	40.06%	20.19%

Habitable Rooms by Tenure and Tenure mix



Tenure	Habitable rooms	
	No.	%
Private	622	64.39%
Social	246	25.47%
Intermediate	98	10.14%
Total	966	100%

Unit location and totals

Location	Market unit	Social rent	Intermediate	Total	Wheelchair
Core 1	118	1	25	144	13
Core 2	56	18		74	7
Core 3	40	18		58	8
Core 4	14	22		36	4
Total	228	59	25	312	32

Residential Design – Dual Aspect (Paragraph 183):

Dual aspect figures

	Dual aspect affordable homes	Dual aspect private homes	Dual aspect total homes
TOTAL	80 of 84 (95.24%)	186 of 228 (81.5)	266 of 312 (85.26%)

Children's open space



GROUND FLOOR PLAN



LEVEL 04



LEVEL 07

Communal open space



Public open space



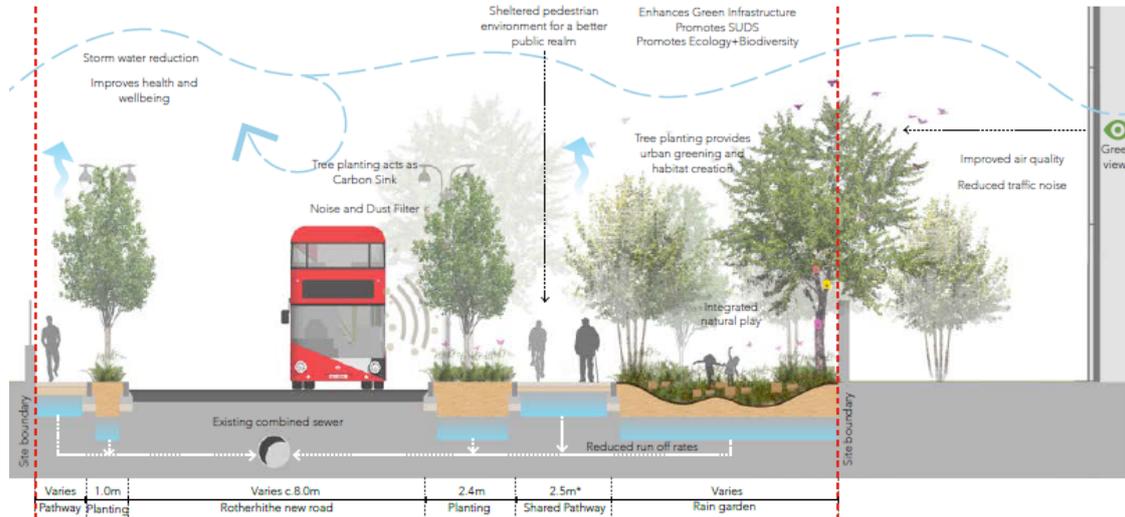
Table: Amenity space proposed against policy requirement

	Policy requirement	Proposal	Difference
Private	3,120sqm (312 flats x 10sqm SPD requirement)	2,960.3sqm	-179.7sqm
Communal amenity	50sqm SPD requirement (+ 179.7sqm shortfall =229.7sqm)	547sqm	+317.3sqm
Children's play space	1331.7sqm (GLA calculator)	1,377sqm	+45.3sqm
Public open space	1,560sqm (312 flats x 5sqm)	434sqm	-1,126sqm Shortfall s106 payment of £230,830 agreed

Proposal for spending S106 Public open space contribution of £230,830

- An appropriate use for this would be to repave the asphalt pavement on the other side of Ilderton Road to include tree planting which would help to reduce air and noise pollution, achieve greenfield run off rates, and encourage habitat creation.

Indicative image:



Sustainability:

Energy (paragraphs 354-368)

- The proposed development would include a CHP plant and PV panels;
- The proposed development would be designed so that it can be connected SELCHP District wide heating network that is currently being developed by the GLA and Veolia. This future connection would further reduce CO2 emissions;
- Residential areas would achieve a 39.7% carbon reduction and non residential areas would achieve a 37% reduction;
- A carbon offset payment of £439,923 has been agreed within the S106 agreement.

Car and Cycle Parking (paragraphs 318-331)

- Residential aspect of the development is car free except for two disabled parking spaces;
- A total of 596 cycle parking spaces and 62 visitor spaces compliant with new London Plan and new Southwark Plan standards.

Tree planting plan (paragraph 165)



10 new trees to be planted on Ilderton Road frontage.

Additional trees and rain gardens to be planted on the opposite side of Ilderton Road. Details will be subject of a public realm scheme funded by the developer.

Greening of Ilderton Road Primary School - In addition to the offset payment the developer has also agreed to an additional unilateral contribution of £200,000 to the greening of the playground and boundary of Ilderton Road Primary School.

Ilderton Road frontage proposed

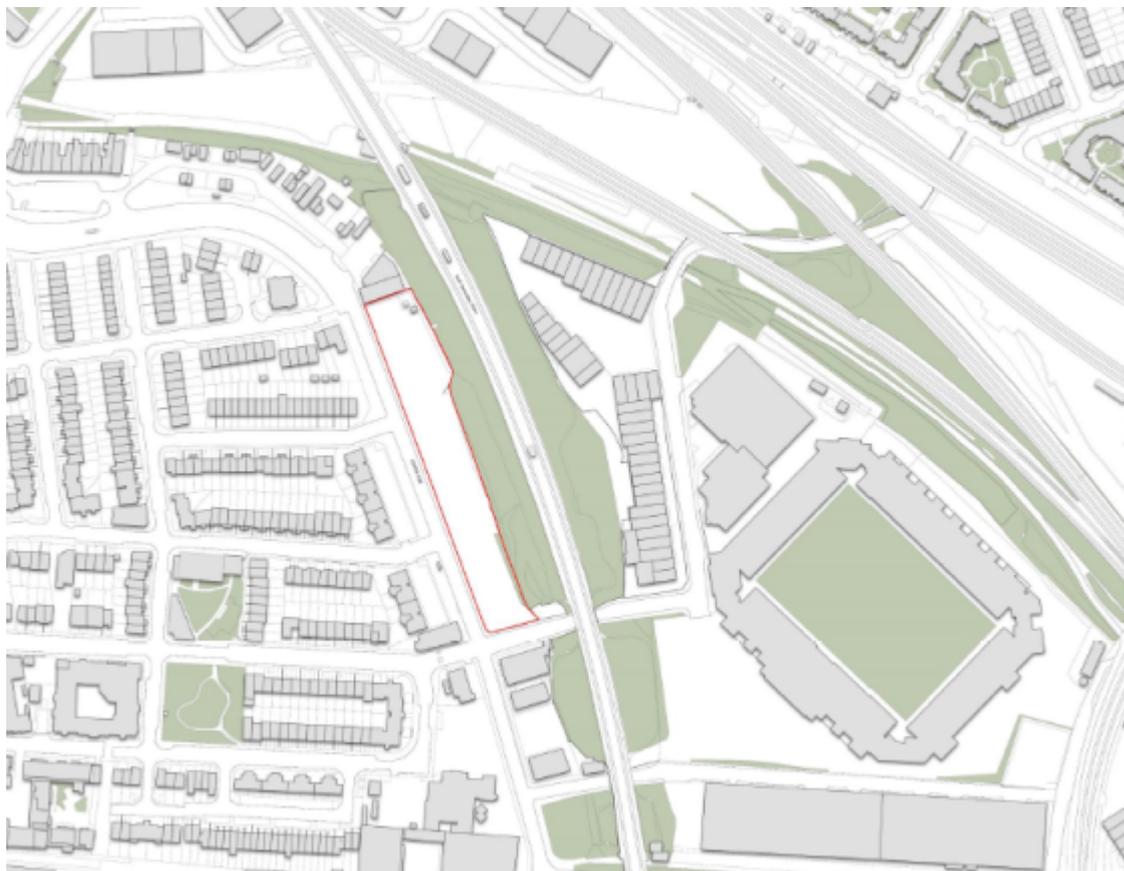


BACKGROUND INFORMATION

Site location and description

3. The site is currently vacant having previously been occupied by RS Joyner & Son who used the open yard space to store and sell second hand lorries and vans (sui generis).
4. The site is approximately 0.5979 ha with a 194m frontage onto Ilderton Road. There are no buildings or trees on the site apart from a telecommunications tower with associated plant. It is a long rectangular shape and is on the east side of the road. The site is to the immediate west of the elevated railway line running parallel to Ilderton Road and serving the South Bermondsey Station which is a one minute walk away to the north. The station platforms are immediately behind the northern end of the site on a raised embankment. Ilderton Road is a busy thoroughfare and includes the P12 bus route.
5. Opposite the site on the other side of Ilderton Road are residential buildings of mainly between two and four storeys and in the roads behind this are two storey houses along Delaford Road, Ablett Street and Barkworth Road. To the north along Ilderton Road is a tyre dealer and workshop and beyond this is the Ilderton Road Travellers site. To the south of the site, on the corner of Zampa Road and Ilderton Road is the Christ Apostolic Church. Further to the south are a mixture of brick and steel buildings accommodating a mix of uses ranging from light industry to manufacturing, community uses and the Ilderton Road Primary School.

Site plan



6. The land to the east of the site, across the railway is within the London Borough of

Lewisham where the Millwall Football Club and stadium can be found, alongside some commercial workshop units. There is an extant planning consent for a major mixed use redevelopment including a series of towers of varying heights up to 25 storeys, known as the “Surrey Canal Triangle Site”. Pre application discussions are underway with Lewisham regarding a new revised scheme that will soon be submitted for the site.

7. The site does not include any listed structures and is not in a conservation area. Christ Apostolic Church to the south of the site on the corner of Zampa Road and Ilderton Road is designated as a building of architectural and historic interest in the draft Old Kent Road Area Action Plan (draft OKR AAP).
8. As detailed in the planning history section below, a brand new open space has recently been delivered 100m to the south of the site fronting onto on Ilderton Road (in between Stockholm Road and Surrey Canal Road). This space has recently been landscaped and is due to open for public use imminently.
9. Soutwark Council own the freehold of the site, which is subject to a long 125-year lease to Argon Capital who have an existing option to acquire the freehold. It is important to note that the council itself could not develop the land because of the long lease interest in the site and on this basis, the 50% affordable housing target for public authorities need not be applied. This view is confirmed with reference to paragraphs 13 and 14 of the GLA guidance note “Threshold approach to Affordable Housing on Public Land” and is further discussed in the Affordable Housing section of the report.

Details of proposal

10. The proposal seeks full planning permission for the mixed use redevelopment of the site, in two buildings, a north building to provide a development of up to 28 storeys and a south building to provide a development of up to 13 storeys. Building heights would range from between three storeys and 28 storeys in height respectively, which would be separated by a new children’s play area which would be accessible to the public. In headline terms the development would comprise:
 - 312 residential units (Use Class C3);
 - 35.61% affordable housing (by habitable room);
 - 448.6 qm GIA of retail floorspace (Use Class A1);
 - 1,817.98sqm GIA of commercial floorspace (Use Class B1);
 - Provision of a publicly accessible central playspace; and
 - Public realm improvements and landscaping.
11. The proposed north building would contain two tall buildings – Building 01 and Building 02 with a five storey building in between. It would also include a six storey building at its northern end.
12. Building 01 would rise a total of 28 storeys and would include retail (Class A1) and commercial B1 provision with residential accommodation (144 homes) on the upper floors.
13. Building 02 would be 16 storeys and would include commercial Class B1 provision and residential (74 homes) on the upper floors.
14. The proposed south building would contain two tall buildings - Building 03 and Building 04 with a five storey building in between.

15. Building 03 would be 13 storeys and would provide commercial B1 provision and residential (58 homes) on the upper floors.
16. Building 04 would rise eight storeys and would include commercial Class B1 provision with residential (36 homes) on the upper floors.
17. At the southern end of the southern block would be a three storey commercial block containing B1 provision.
18. There would be a total of four cores in the proposed development.
19. The materials would be a red/brown mix brick, metal framed windows and doors and zinc roofs.
20. A ground floor children's play area would be provided within the centre of the development, which would be open for public use. Two further ground floor play areas would be provided adjacent to the railway line for resident use. A series of internal communal and children's amenity rooms would be also provided, together with roof top children's play space at fourth floor levels, and communal amenity spaces at roof level.
21. A basement area would be provided within the development to accommodate cycle storage, bin storage and a plant room. An off street servicing area would be provided to the north of the site, accessed from Ilderton Road. An additional loading area would be provided inset into the Ilderton Road pavement.

Amendments

22. The following amendments were made to the scheme:
 - Omission of duplex residential units on the ground floor and ground floor mezzanine and replacement with additional commercial floorspace;
 - Increase in commercial floorspace from 1151.17 sqm GIA to 1,817.98 sqm GIA;
 - At ground floor level, changes to the internal arrangement to facilitate an uninterrupted visual and physical route into the external children's playspace;
 - Reduction in the number of residential units from 327 units to 312 units;
 - Removal of projecting bay at first floor level;
 - Relocation of the affordable housing units to lower five floors across the whole development in all four cores;
 - Revisions to the wheelchair units;
 - Incorporation of indoor children's playspace on ground floor to connect to the outdoor playspace with updated landscaping; and
 - Provision of children's play space at level 04 of the proposed development and enlargement of ground floor central play space.
23. The building envelope did not change through the above listed amendments with the building heights and massing remaining as initially submitted. The amendments were subject to a 14 day re-consultation.

Relevant planning history

24. 18/AP/0112 Application type: Screening Opinion (EIA) (SCR)
Request for EIA Screening Opinion for the erection of several interconnecting blocks with three taller elements (ground plus 11, 11 and 25 storeys, plus basement level across the

site). The development would provide a total of 324 residential units with ancillary uses and associated plant. The development would also include hard and soft landscaping works, disabled car parking and cycle parking in the basement.

Decision date Decision: Screening Opinion - EIA Regs (SCR)

Pre-application advice

25. Pre-application advice was provided in advance of the submission of this application, details of which are held electronically by the Local Planning Authority which focussed on the design and height of the proposal, impacts upon adjoining neighbours, affordable housing provision and the internal layout of the proposed accommodation. The pre-application documents are held electronically.

Planning History of Adjoining Sites

26. The council has received a number of planning applications recently in the Old Kent Road Opportunity Area. These include the following:
- 180 Ilderton Road: Planning permission granted with S106 in September 2018 for a mixed use scheme with B1 and 84 flats in a part-five, part-eight, part-nine storey development.
 - 62 Hatcham Road and 134-140 Ilderton Road: Planning Permission granted with S106 in March 2019 for a mixed use scheme with B1 and 86 flats in a nine storey development.
 - Iberia House, 2 Hatcham Road: Planning permission granted with S106 in July 2019 for a mixed use scheme with B1c and 33 flats in a nine-storey development. Pending S106.
 - 78-94 Ormside Street: Planning permission granted with S106 in March 2019 for a mixed use scheme with B1c and 56 flats in a ten- storey development.
 - 301-303 Ilderton Road: Planning permission with S106 in November 2019 granted for a mixed use scheme with B1c and 46 flats in a 12-storey development. Pending S106.
 - 313-349 Ilderton Road: Planning permission granted for a mixed use development of B1 and 130 flats in a part-13, part 15-storey development. Pending S106.
 - 2 Varcoe Road: Planning permission granted with S106 in December for a mixed use scheme with B1 and 74 flats in a part-seven, part- nine development. Pending S106.
 - 171-177 Ilderton Road (Atar House): Planning permission granted on 18 August 2016 for the erection of a four-storey building to provide nine flats. This development has been built.
 - 227-255 Ilderton Road (Leathams): Planning application submitted in May 2019 for demolition of existing buildings and the erection of a development up to 28 storeys to provide industrial and residential accommodation. Under consideration.
 - National Grid Compound Site Ilderton Road (in between Stockholm Road and Surrey Canal Road): Construction of an underground tunnel to accommodate high voltage cables from the National Grid (New Cross) compound at Ormside Street to Surrey Canal Road. The erection of two headhouse buildings and hard and soft landscaping

and other associated works incidental to the development. Granted 23.03.2017. This development has been completed and a new open space – known as the Ilderton Road open space has recently been delivered.

- Surrey Canal Triangle scheme, Surrey Canal Road, London, SE14 in the London Borough of Lewisham: Planning permission granted in 2012 for 2,400 new homes and 50,000sqm of commercial floorspace.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

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

- Principle of the proposed development in terms of land use and the release of the site from its industrial designation;
- Environmental impact assessment;
- Affordable housing and development viability;
- Design, layout and impact on townscape views and heritage assets;
- Trees and landscaping;
- Housing mix;
- Density and quality of accommodation;
- Outdoor amenity space, children's play space and public open space;
- Impact of proposed development on amenity of adjoining occupiers and surrounding area;
- Transport;
- Archaeology;
- Wind and microclimate;
- Flood risk and water resources;
- Ground conditions and contamination;
- Fire safety;
- Air quality;
- Noise and vibration;
- Health;
- Sustainable development implications;
- Planning obligations (S.106 undertaking or agreement);
- Mayoral and Borough community infrastructure levy (CIL);
- Other matters
- Statement of community involvement.

Legal context

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

Planning policy

30. The statutory development plans for the Borough comprise the National Planning Policy Framework 2019, London Plan 2016, Southwark Core Strategy 2011, and saved policies from The Southwark Plan (2007 - July). The site falls within the area covered by the draft Old Kent Road Area Action Plan (draft OKR AAP).

Planning policy designations

31. The application site is found within the following Planning Policy Designations:
- The Old Kent Road Opportunity Area;
 - Draft OKR AAP site OKR 16;
 - Strategic Protected Industrial Location;
 - The Urban Density Zone;
 - Bermondsey Lake Archaeological Priority Zone;
 - The Air Quality Management Area;
 - Public Transport Accessibility Level (PTAL) of 3 on a scale of 1 to 6b where 1 represents low accessibility and 6 represents excellent accessibility;
 - Flood Zone 3;
 - The site is located adjacent to the South Bermondsey Railway Embankments which is a Site of Importance of Nature Conservation (SINC) and also classified as Borough Open Land; and
 - The site is 40m away from the Ilderton Road Homes for Travellers and Gypsies site.
32. There are no listed buildings or conservation areas within a 500m radius of the site.
33. This application should be determined in accordance with the development plan unless material considerations indicate otherwise; and the following national framework, regional and local policy and guidance are particularly relevant.

Adopted policy

National Planning Policy Framework

34. 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.
35. Paragraph 212 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.

Section 2 - Achieving sustainable development

Section 5 - Delivering a sufficient supply of homes

Section 6 - Building a strong, competitive economy

Section 7 - Ensuring the vitality of town centres

Section 8 - Promoting healthy and safe communities

Section 9 - Promoting sustainable transport

Section 11 - Making effective use of land

Section 12 - Achieving well-designed places

Section 14 - Meeting the challenge of climate change, flooding and coastal change

Section 15 - Conserving and enhancing the natural environment
Section 16 - Conserving and enhancing the historic environment

London Plan 2016

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

Policy 2.17 Strategic Industrial Locations
Policy 3.1 Ensuring Equal Life Chances for All
Policy 3.3 Increasing housing supply
Policy 3.5 Quality and design of housing developments
Policy 3.6 Children and young people's play and informal recreation facilities
Policy 3.8 Housing choice
Policy 3.9 Mixed and balanced communities
Policy 3.10 Definition of affordable housing
Policy 3.11 Affordable housing targets
Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes
Policy 3.13 Affordable housing thresholds
Policy 4.3 Mixed use development and offices
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

37. The London Plan 2016 identifies the Old Kent Road as an Opportunity Area with “significant potential for residential – led development along the Old Kent Road corridor”. Opportunity Areas are described in the London Plan (2016) as London’s major reservoirs of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility.
38. 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.

Mayoral SPGs

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

Housing SPG (2016)
London View Management Framework (2012)
London's World Heritage Sites SPG (2012)
Providing for Children and Young People's Play and Informal Recreation (2008)
Use of planning obligations in the funding of Crossrail (2010)
Affordable Housing and Viability SPG (2017)
GLA Guidance on the Threshold Approach to Affordable Housing on Public Land

40. 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:

Core Strategy 2011

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

Southwark Plan 2007 (July) - Saved Policies

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

- 1.1 - Access to employment opportunities
1.2 - Strategic and local preferred industrial locations
2.5 - Planning obligations
3.2 - Protection of amenity
3.3 - Sustainability assessment
3.4 - Energy efficiency
3.6 - Air quality
3.7 - Waste reduction
3.9 - Water
3.11 - Efficient use of land
3.12 - Quality in design
3.13 - Urban design
3.14 - Designing out crime
3.15 - Conservation of the Historic Environment
3.18 - Setting of Listed Buildings, Conservation Areas and World Heritage Sites
3.19 - Archaeology
3.20 - Tall Buildings
3.22 - Important Local Views

- 3.28 - Biodiversity
- 4.2 - Quality of residential accommodation
- 4.3 - Mix of dwellings
- 4.4 - Affordable housing
- 4.5 - Wheelchair affordable housing
- 5.2 - Transport impacts
- 5.3 - Walking and cycling
- 5.6 - Car parking
- 5.7 - Parking standards for disabled people and the mobility impaired

Supplementary Planning Documents (SPDs)

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

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

Emerging Planning Policy

Draft New London Plan

44. 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 and closed in May 2019. The Inspector's report and Panel Recommendations were issued to the Mayor of London in October 2019. The Mayor then issued his intentions to publish the London Plan along with a statement of reasons for not including all of the Inspector's recommendations to the Secretary of State. The Secretary of State will respond to the Mayor, due before 17 February 2020. Until the London Plan reaches formal adoption it can only be attributed limited weight.
45. The draft New London Plan identifies the Old Kent Road as having a minimum capacity for 12,000 homes and a jobs target of 5,000 which increases the capacity of the adopted London Plan of 2,500 homes and 1,000 jobs.

New Southwark Plan

46. For the last five years the council has been preparing the New Southwark Plan (NSP) which will replace the saved policies of the 2007 Southwark Plan and the 2011 Core Strategy. The council concluded consultation on the Proposed Submission version (Regulation 19) on 27 February 2018. The New Southwark Plan Proposed Submission Version: Amended Policies January 2019 consultation closed in May 2019.

The New Southwark Plan Submission Version – Proposed Modifications for Examination was submitted to the Secretary of State in January 2020 for Local Plan Examination. It is anticipated that the plan will be adopted in late 2020 following an Examination in Public (EIP). As the NSP is not yet adopted policy, it can only be attributed limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give weight to

relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.

Old Kent Road Area Action Plan (draft OKR AAP)

47. The council is preparing an Area Action Plan for Old Kent Road (AAP) 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 four years, with a first draft published in 2016. A further preferred option of the Old Kent Road AAP (Regulation 18) was published in December 2017 and concluded consultation on 21 March 2018. As the document is still in draft form, it can only be attributed limited weight.

Principle of development in terms of land use

48. The existing site is a vacant open concrete space with a separate telecommunications tower. Historically it was in residential use which suffered bomb damage in the war and became a cleared site, as it is today. It was previously occupied by RS Joyner and Son to hold redundant trucks which were then sold online. Its lawful use is considered to be sui generis.
49. The site is located in a Strategic Preferred Industrial Location (SPIL) identified in the Core Strategy. Strategic Policy 10 of the Core Strategy states that SPIL will be protected for industrial and warehousing uses. Saved Southwark Plan policy 1.2 states that the only developments that will be permitted in SPIL are B class uses and other sui generis uses which are inappropriate in residential areas. The proposed development would represent a departure from these policies by introducing residential uses into the SPIL.
50. Recognising that the site is located in the Old Kent Road Opportunity Area where the draft OKR AAP sets an aspiration to deliver 20,000 new homes alongside industrial and other uses, Southwark officers have worked closely with the GLA to agree on the release of significant areas of the SPIL to allow for mixed use redevelopments to come forward and have agreed a geography of the strategic industrial land release and consolidation. The agreed maps propose the release of the site from the SPIL to allow for the provision of new homes. The agreed maps have been included in the emerging New Southwark Plan.
51. 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. It should also be noted that there have been a number of objections to the proposed release of industrial land from third parties which would need to be considered at the EiP.

The Old Kent Road Area Action Plan (OKR AAP)

52. The site is identified as falling within proposal site OKR16 within the draft OKR AAP. The draft site allocation states that redevelopment on this site must:
 - Replace existing employment floorspace (B use class) and provide a range of employment spaces which is consistent with the building and land use types shown in Figure SA4.3 and;
 - Retain the land on the west side of Ormside Street and the Penarth Centre as Strategic

Protected Industrial Land, suitable for B Class uses and other sui generis transport related uses, such as car repairs. In addition, arts and cultural uses in D Class will be permitted in the Penarth Centre. Residential and other sensitive uses will not be permitted in SPIL, and

- Provide land for an expansion of Ilderton Primary School;
- Provide a new park with a commercial focus and to create a new east-west walking and cycling link between Ilderton Road and Ormside Street;
- Enable the provision of future walking and cycling links through the Integrated Waste Management facility; and
- Provide on site servicing.

53. Figure SA4.3 of the draft OKR AAP refers to Building typologies and uses and identifies the site to provide a residential ground floor with residential accommodation on the upper floors. The proposed development instead includes a mix of uses on the ground floor to include retail, office and residential with internal communal residents rooms also provided. It is considered that this mix of uses would be more appropriate taking into account the close proximity of Millwall Football stadium where it is felt that wholly residential accommodation on the ground floor would be compromised.
54. Emerging policy AAP6 of the draft OKR AAP states that development must:
- Retain or increase the amount of Class B 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;
 - Ensure a specialist provider would manage the workspace;
 - Secure an element of affordable workspace, and;
 - Result in an increased number of jobs.
55. The proposal would achieve all of these aspirations as follows:
- 1,817.98sqm GIA of new Class B floorspace would be provided;
 - No businesses would require relocating;
 - A specialist provider would manage the workspace;
 - 12% affordable workspace would be provided; and
 - 190-195 new jobs would be created, a significant uplift when compared to the previous five jobs.
56. As mentioned above, the proposal would be contrary to Strategic Policy 10 of the Core Strategy and Saved Policy 1.2 of the Southwark Plan as it would introduce residential (Class C3) floorspace within the SPIL prior to the release of the site from the SPIL becoming the adopted plan position. Therefore 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 justify a departure from the adopted planning policy. Set out in the following paragraphs are the key benefits arising from the proposal.

Employment provision

57. The site is currently vacant. The previous lorry park use provided low levels of employment at five jobs in total. The proposed development seeks to provide 1,817sqm GIA of new B1 space which is welcomed and is a positive aspect of the scheme. The new B1 provision

includes a total of six separate units, with two of these being on two levels (ground and mezzanine) and one on the corner of Zampa Road rising to three levels.

Retail use

58. The retail use is proposed in two units on the ground floor level and would front Ilderton Road to the north of the site, closest to the station, measuring a total of 448.6sqm. The retail use has been designed to be of a size to serve the development and immediate local community.
59. Southwark Plan Saved Policy 1.7 relates to development within town centres, and states that most new development for town centre uses should be accommodated within existing town centres and local centres.
60. In terms of the allocation sites identified in the emerging NSP, the application site is contained within the boundary of site allocation NSP 67. The NSP states that development here should provide new homes as well as retail and employment floorspace. The retail use would be under the threshold for when an impact assessment would be required (1000m).
61. Therefore whilst the retail use would be located outside of a town or local centre, the retail use would be of a size to serve the local catchment in a part of the opportunity area where limited retail opportunities exist. The site is very close to South Bermondsey Station. It is also very close to a proposed new overground station (New Bermondsey) on Surrey Canal Road in Lewisham. It would also provide for a vibrant, active ground floor and be an appropriate ground floor use in an area close to the Millwall Football Stadium.
62. The retail use is not considered harm the vitality and viability of any nearby town centre, being sufficiently distanced from the two closest centres at Canada Water (750m away) and The Blue (700m away). It would aid in the regeneration of this part of the opportunity area providing a useful service and active frontage on Ilderton Road. The small quantum of retail space provided has been conceived as a local amenity such as a convenience store rather than a larger retail footprint the type of which would be better placed on the Old Kent Road.

Business relocation and retention

63. The site was previously occupied by RS Joyner & Son for the storage of lorries and vans. RS Joyner & Son relocated to another site in Dartford, at the end of March 2018 leaving the site vacant. Therefore there are no businesses that require to be relocated.

Job creation

64. Overall, the employment floorspace is predicted to provide between 190-195 jobs. The job numbers have been calculated using the methodology provided in the Homes and Communities Agency Employment Density Guide 2015. This represents a significant uplift when compared to the previous five jobs on the site. The proposal therefore contributes to the target of creating 10,000 new jobs by 2036 in the Old Kent Road Opportunity Area as set out in the draft OKR AAP.

Affordable workspace

65. 12% of overall commercial floorspace would be safeguarded as affordable workspace, which would assist businesses through the provision of affordable, accessible and flexible workspace. The applicant has offered Commercial Unit 4 which totals 272.99sqm (12%).

This space would be offered to existing businesses in the Old Kent Road Opportunity Area first. The space has been offered at £12 to £15 per sqft inclusive of service charge and the applicant has stated that the space would be offered for a period of 15 years. The affordable workspace offer will be secured by the S106 legal agreement.

Specialist workspace provider

66. The employment space has been designed to be flexible and would accommodate a range of different unit sizes and would suit small to medium enterprises (SME's). The applicant has committed to secure a creative workspace provider. This can be secured through a section 106 planning obligation.

Provision of housing, including affordable housing

67. The scheme would provide 312 residential units, including more than a policy compliant affordable housing comprising social rented and intermediate units, at 35.61%. There is a pressing need for housing in the borough. Policy 3.3 of the London Plan supports the provision of a range of housing and sets the borough a target of 27,362 new homes between 2015-2025. 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. This is echoed by emerging policy in the draft new London Plan, New Southwark Plan and draft OKR AAP. The proposal would make a sizeable contribution to the borough's housing stock and combined with a policy compliant affordable housing offer; this is considered to represent a significant positive aspect of the scheme.

Prematurity

68. Legal Advice received in relation to this issue highlights the following from the National Planning Policy Guidance "arguments that an application is premature are unlikely to justify a refusal of planning permission other than where it is clear that the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, taking the policies in the Framework and any other material considerations into account. Such circumstances are likely, but not exclusively, to be limited to situations where both:
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 - (a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging Local Plan or neighbourhood planning; and
 - (b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.
70. Refusal of planning permission on grounds of prematurity would seldom be justified where a draft Local Plan has yet to be submitted for examination, or in the case of a Neighbourhood Plan, before the end of the local planning authority publicity period. Where planning permission is refused on grounds of prematurity, the local planning authority will need to

indicate clearly how the grant of permission for the development concerned would prejudice the outcome of the plan-making process.”

71. The most up to date development plan pertinent to the Old Kent Road area is the 2016 London Plan. This identifies the Old Kent Road Opportunity Area as having significant potential for housing led growth. The draft OKR AAP has been developed in response to this adopted plan and has also sought to address the emerging policy position of the draft New London Plan including the increased housing target for the opportunity area and the need to ensure that the 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 OKR AAPs and the 2018 draft New London Plan. It is not therefore considered to be premature.

Conclusion

72. To conclude in relation to land uses, the proposed development would introduce of residential (Class C3 uses) into the SPIL which would represent a departure from the adopted development plan. This must therefore be weighed against the benefits of the scheme which include:
- 1,817.98sqm of new employment floorspace;
 - 448.6sqm of new retail floorspace;
 - The provision of high quality, modern, flexible commercial space;
 - 190-195 new jobs, an uplift of at least 185 jobs when compared to the five previous jobs;
 - The delivery of 12% affordable workspace within the Old Kent Road Opportunity Area, and;
 - The provision of 312 new homes, of which 35.61% would be affordable.
73. Some limited weight can be attached to the draft NSP and draft 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 then introduction of housing would prejudice the operation of existing businesses in the area. In light of this, officers consider that the principle of the proposed development in land use terms should be supported.

Environmental impact assessment

74. The applicant made a screening request to determine whether an Environmental Impact Assessment would be required. The site does not fall within any of the descriptions of development listed in Schedule 1 of the EIA Regulations and is therefore not a Schedule 1 development.
75. Schedule 2 development means development mentioned in Column 1 of the table in Schedule 2 where:
- A) Any part of that development is to be carried out in a sensitive area; or
 - B) Any applicable threshold or criterion in the corresponding part of Column 2 of the table 2 of that table is respectively exceeded or met in relation to that development.
76. No part of the proposed development is within a “sensitive area” such as Areas of Special

Scientific Interest, Areas of Outstanding Natural Beauty or National Parks.

77. Schedule 2 development under item 10(b) is classed as an urban development project. The threshold for item 10(b) is as follows:
- i. The development includes more than one hectare of urban development which is not dwelling house development; or
 - ii. The development includes more than 150 dwellings; or
 - iii. The overall area of the development exceeds five hectares.
78. The site is approximately 0.5979 hectares in size and does exceed the 150 dwelling house threshold. It is therefore classified as a Schedule 2 development for the purposes of screening.
79. The overriding determination for EIA was therefore whether the proposed development is likely to result in 'significant' effects on the environment. It was determined that based on the selection criteria to determine whether the Schedule 2 development is likely to have significant impacts on the development, that the development would not give rise to impacts of more than local significance and therefore that it would not require an EIA.

Affordable housing and development viability

Affordable housing

80. The proposed development overall would provide 35.61% affordable housing. This would comprise of 25.47% social rented housing and 10.14% shared ownership intermediate housing to reflect the draft NSP Policy P1.
81. The social rented flats would be located on the lower five floors of the proposed development. Similarly, the intermediate flats would also be located on the lower five floors of the proposed development and the private flats would be located above these five floors. The design of the units would be tenure blind. All of the buildings would be of a mixed tenure. Service charges for the social rented units would be capped and controlled since the social rent units would be contained within the lower five floors of the proposed development.
82. The Southwark Plan saved policy 4.4 requires at least 35% of all new housing as affordable housing. Of that 35%, there is a requirement for 50% social housing and 50% intermediate housing in the Old Kent Road Action Area. The adopted London Plan 2017 sets a strategic requirement of 60% social housing and 40% intermediate housing. The emerging 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. Overall, the proposed development would provide a total of 35.61% affordable housing with 25.47% social rented and 10.14% intermediate housing. Accordingly, the proposed development is in accordance with the emerging New Southwark Plan.
83. The requirement for social housing set out in the New Southwark Plan is higher than the London Plan and the saved Southwark Plan policy given the acute need for social housing in Southwark. Approximately 57% of the borough's total affordable housing need is for intermediate housing to meet the housing needs of lower and middle income residents. However, the most acute affordable housing need is for social rented housing to meet the needs of homeless households living in unsuitable temporary accommodation such as bed and breakfasts or overcrowded conditions. Overcrowding is strongly related to poor physical

and mental health and can strain family relationships. Children in overcrowded homes often achieve poorly at school and suffer disturbed sleep. Social rented housing is vital to social regeneration as it allows residents who cannot afford suitable market housing to remain close to their families, friends and employment. For this reason draft Policy P1 of the NSP requires a minimum 25% of homes to be provided as social rented housing which the proposed development complies with.

84. In accordance with emerging Policy P1 of the New Southwark Plan, rooms that are over 28sqm have been counted twice for the purposes of calculating affordable housing. This accounts for large open plan living room spaces that include kitchens and dining areas.
85. In total, 966 habitable rooms would be provided in the proposed development. The development would provide a total 344 affordable habitable rooms which would equate to an overall provision of 35.61%. The level of provision would exceed the minimum target of 35% and is therefore fully policy compliant and a very positive aspect of the scheme. Viability information has been submitted which supports the delivery of the quantum of affordable housing proposed.
86. With regard to tenure split, out of the 344 affordable habitable rooms, 25.47% would be social rented (246 habitable rooms) and 10.14% would be intermediate shared ownership (98 habitable rooms). This exceeds the requirement for 25% of homes to be social rented.

Table: Affordable housing mix

	No of units	Percentage
1 bedroom	10	11.9%
2 bedroom	31	36.90%
3 bedroom	41	48.8%
4 bedroom	2	2.4%
Total	84	100%

Table: Affordable housing by tenure

	Social rent	Intermediate	Market	Total
Studio	0	0	15	15
1 bedroom	7	3	99	109
2 bedroom	17	14	94	125
3 bedroom	33	8	20	61
4 bedroom	2	0	0	2
Total	59	25	228	312

87. The proposed affordable units would be located on lower five floors of the proposed development, in all buildings. Access to the affordable units would be from the same core as the private units, with restricted access through a fob or similar system. The applicant has confirmed that service charge costs to social rent tenants would be capped within social rent cap levels.
88. The Section 106 legal agreement would secure the delivery of these units, including clauses to prevent the occupation of more than 50% of the private apartments until 50% of the affordable units are completed. In line with the Mayor's Affordable Housing and Viability SPG, an early review mechanism would be secured by the Section 106 agreement, which would come into effect if the development does not substantially commence within 24 months. The review would determine whether the viability of the development has improved

during that time, and accordingly whether it could deliver any more affordable housing. However, it should be stressed that the overall quantum of 35.61% would remain as the minimum level of provision. The review mechanism would capture any increase should the development be able to support it.

89. The legal agreement should also specify that the shared ownership units would be firstly offered to Southwark income cap levels before they are offered to the London income caps.
90. A contribution of £11,117.40 (a charge of £132.35 per unit on a provision of 84 affordable units) has been agreed towards affordable housing monitoring and maintained provision of these units, and would be secured by the legal agreement.
91. It should be noted that the freehold site is owned by the council but is subject to a 125 year lease to Argon Capital. It is important to note that the council itself could not develop the land because of the long lease interest in the site and on this basis, the 50% affordable housing target for public authorities need not be applied. This view is confirmed with reference to the GLA guidance note "Threshold approach to Affordable Housing on Public Land" specifically states in paragraphs 13 and 14 that:

"On some sites the freehold land interest may be in public ownership, whereas a private landowner may hold a long leasehold interest. In this instance control of the land is primarily in private hands (although the freeholder's consent may be needed in some instances including redevelopment).

For these reasons where the public sector land interest is in the form of a freehold or similar interest and a long leasehold is in place which is not held by the public land owner, the 35 per cent threshold would apply in relation to the Fast Track Route".

Development Viability

92. Southwark's Development Viability SPD requires a financial viability appraisal to be submitted for all planning applications which trigger a requirement to provide affordable housing. The financial viability appraisal should identify the maximum level of affordable housing that can be sustained and justify any proposed departures from planning policy requirements.
93. The applicant initially submitted a Financial Viability Assessment prepared by DS2 dated July 2018 which was subsequently updated on 2 March 2020 to reflect the updated residential housing mix and the revised commercial floor areas. The information submitted was reviewed by an independent consultant, acting on the council's behalf.
94. The council's consultant made a number of adjustments to the applicants appraisal as follows:
 - the Benchmark Land Value of £2,241,000 was been inputted;
 - the following profit targets were inputted on Gross Development Value (GDV): 17.5% for private residential, 15% for commercial and 6% for affordable residential;
 - private residential values were adjusted to an average of £709 per sqft to represent an approximately 5% increase on the average value proposed by DS2 in 2018;
 - shared ownership values were adjusted to an average of £415psf;
 - the yield on the office space was adjusted to 5.5% and the retail yield to 6%;
 - professional fees were adopted at 10%;
 - updated S106 and Community Infrastructure Levy (CIL) costs and;
 - revised build costs were adopted following advice from the council's cost consultant.

95. Following the above referenced adjustments, the scheme would produce a deficit of approximately £5.63 million, which equates to approximately 4% on Gross Development Value (GDV). The council's consultant therefore concludes that the current viability position does not support an increased provision of affordable housing. It should be recognised that the site is located within the Old Kent Road Opportunity Area which sees the ongoing regeneration of the Old Kent Road area including the Bakerloo Line Extension and therefore it is likely that both residential and commercial values would grow over time, which would improve the viability of the scheme.
96. Accordingly, the council's consultant has concluded that the proposed development cannot viably deliver further affordable housing over and above the amount currently being offered by the applicant.

Conclusion on Affordable Housing

97. In conclusion, the level of affordable housing proposed is a very positive aspect of the proposals. The scheme would deliver 35.61% affordable housing which meets and slightly exceeds the policy requirements of 35%. Terms to secure the affordable housing would be included in the legal agreement, together with an early stage viability review.

Design, layout and impact on townscape views and heritage assets

98. The proposed development involves the redevelopment of the site to provide a new development up to 28 storeys in height consisting of a north building and a south building separated by a children's play space.
99. The emerging policy in the draft OKR 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. The draft OKR AAP does however identify buildings of townscape merit and architectural or historic interest around the site. None would be harmed by these proposals. The AAP identifies the site as an appropriate location for a tier 2 tall building of up to 25 storeys with a series of buildings reducing in height towards the south of the site.

Image: Stations and Crossings Strategy from draft OKR AAP



100. Although the proposal is 28 storeys rather than 25 at its highest the scheme is considered to generally follow the plan guidance. It would not create a wall of development along Ilderton Road as it reduces in height to the south and the block is broken in the middle by a new public space. It is not considered that this proposal would result in any harm to designated London wide or local protected views, including the Protected Vista of 2A.1 of the London View Management Framework, which protects views from Parliament Hill Summit to St. Paul's Cathedral.

Layout

101. The site is currently vacant having been previously used for the storage and sale of disused vehicles. It has no permanent structures or buildings on the site other than a communications tower with associated plant. The street currently lacks townscape legibility and a defined edge.
102. The proposed new buildings would create a new active frontage to this long 194m site, whilst widened pavements (from between 1.72m - 1.92m as existing to between 3.8m - 9.2m as proposed) and a generous soft landscaped central children's square would establish a net gain in public space and biodiversity. (The adjacent railway embankment is a Site of Importance to Nature Conservation SINCC). The linear arrangement of the stepped

buildings is as set out in the draft AAP.

103. At the centre of the site the design includes a children's play space which offers communal amenity for residents and occupiers as well as for members of the public. Along the eastern edge of the site are a further two landscaped spaces which accommodate two further children play spaces for resident use. These back onto the Network Rail embankment which contains a number of mature trees.
104. Millwall football club is located close to the site with the main access into the ground being from Zampa Road. The ground floor layout and landscape has been designed in recognition of the close proximity to the football ground with the provision of wider pavement widths and the provision of retail and commercial areas on the street facing ground floor.
105. The closest station, South Bermondsey, is just a few minutes' walk from the Millwall football ground and features a direct walkway into the stand for away fans, built to aid the police with sometimes challenging crowd management, the use of the direct walkway reduces pedestrian traffic on Ilderton Road and reduces the potential for conflict.
106. The applicant has stated that the development would be managed on a 24 hour basis with additional security being allocated on match days. The rear of the site would be permanently secured between the building and the railway to prevent unauthorised individuals and crowds from accessing more sheltered communal areas of the proposed development.
107. The proposal has been specifically designed to ensure that it steps down at its southern ends to provide a transitional massing between the tower elements and the surrounding buildings, particularly the old chapel building on Ilderton Road . The use of brick creates a further contextual link between the buildings, whilst the patterning of the brick provides a strong character and identity to the building.
108. The impact on the travellers' site is further mitigated by the introduction of a number of additional trees to the north of the site which would help to screen the proposed development (in addition to the ten trees along Ilderton Road).

Height and massing

109. In terms of height scale and massing, the proposals under consideration are for a development rising up to 28 storeys with four cores separated by a minimum distance of at least 18m. The heights and massing strategy is broadly in line with the draft AAP height strategy for this site and is supported in terms of creating a gradual increase in height towards the station, which is beneficial in townscape terms, and ensures the most densely developed part of the site has the best public transport access. The lower elements of the proposal to the south take their scale references from the existing residential buildings to the west and the chapel on the corner of Zampa Road.

Image: Proposed building heights

APPEARANCE - SURFACES AND MATERIALS
BUILDING 01 & BUILDING 02 - COMMERCIAL COURTYARD



110. The lower three storey commercial building fronting Ilderton Road and Zampa Road would provide a legible robust street edge.
111. The heights of the buildings in particular would mark a step change in the scale of the surrounding area. The buildings have been arranged to allow for as much space between them as possible (at least 18m), ensuring that they would not appear to coalesce when viewed from a distance. This also ensures that good levels of sunlight and daylight would reach the public realm. The relative heights and the way in which they would be distributed across the site would result in a well articulated composition of towers and would define the ground floor children's play space.
112. The design of the tall buildings submitted in detail would be exemplary, with careful consideration of their impact on the skyline.
113. All of the proposed buildings, would be substantially taller than those in their existing surroundings. As such, they would be defined as tall buildings in the adopted London Plan (2016). Policy 7.7 of the 2016 London Plan, 'Location and Design of Tall and Large Buildings', states that tall buildings should be limited to sites in the Central Activity Zone, Opportunity Areas, areas of intensification or town centres that have good access to public transport.' Furthermore, London Plan Policy 2.13 requires development in Opportunity Areas to optimise residential and non residential output densities, meet or exceed minimum housing and employment guidelines and support wider regeneration objectives. Annex 1 of the 2016 London Plan sets out the specific requirements for the Old Kent Road Opportunity Area, identifying it as having significant potential for residential- led redevelopment. As such, it is considered that the Old Kent Road Opportunity Area is, in principle, an appropriate location for tall buildings which optimise housing delivery and regeneration benefits. The proposed development is considered to achieve both, whilst also meeting the other requirements of London Plan Policy 7.7, which are as follows:
 - Generally be limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport;
 - Only be considered in areas whose character would not be affected adversely by the

- scale, mass or bulk of a tall or large building;
 - Relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level;
 - Individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London;
 - Incorporate the highest standards of architecture and materials, including sustainable design and construction practices;
 - Have ground floor activities that provide a positive relationship to the surrounding streets;
 - Contribute to improving the permeability of the site and wider area, where possible;
 - Incorporate publicly accessible areas on the upper floors, where appropriate;
 - Make a significant contribution to local regeneration;
 - Not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference; and
 - Not impact on local or strategic views adversely.
114. The proposed tall buildings would be limited to a site within an opportunity area. The character of the area would not be adversely affected by the scale, mass or bulk of the tall buildings proposed because this area is not generally considered sensitive to change of this type. The existing open nature of the site is not worthy of protection. Its replacement with a scheme of high quality architectural and urban design is considered a significant public benefit of the proposals.
115. The proposed tall buildings would relate well to their surroundings, particularly at street level, with active frontages, increased connectivity and a new public children's open space. The sensitively detailed architectural design of the tall buildings would introduce a new high quality aesthetic.
116. The proposed building heights would improve the legibility of the area by signifying the location of the South Bermondsey Station.
117. The proposals demonstrate the highest standards of architectural design and incorporate the highest quality materials. The elevational strategy and material palettes are discussed in more detail below. In order to secure design quality, planning conditions requiring detailed drawings, material samples and full scale (1:1) mock ups are recommended. It is also clear from the submitted energy and sustainability strategies that the proposals would incorporate high quality sustainable design with the inclusion of photovoltaic panels and the draft construction management plan demonstrates commitment to excellent construction practices.
118. The proposed development would not incorporate any publicly accessible areas on the upper floors, but is noted, that the London Plan (2016) only requires this "where appropriate". There would be amenity spaces for residents at various levels throughout the scheme. This would include some roof top communal gardens for residents which would give a soft, green layer of articulation to the appearance of the buildings.
119. The contribution that the scheme would make to local regeneration would be very significant. As has already been identified throughout the report, this would include the provision of significant contribution to the borough's housing stock, including affordable housing; a significant increase in jobs and new retail and employment spaces. It would also

include a publicly accessible children's play space.

120. The impact of the proposed development on microclimate, wind turbulence, overshadowing, noise, aviation, telecommunication interference is all assessed and presented elsewhere in this report. In each case it is concluded that there would be no significant adverse impacts.
121. Finally, there would be no unjustifiably harmful impact on local or strategic views, as discussed in more detail below.
122. As the most recently adopted document in the Local Plan, and the only document adopted after the Old Kent Road was designated as an Opportunity Area with significant potential for residential-led redevelopment, it is considered that these London Plan (2016) policies in relation to tall buildings are more relevant than those in Southwark Plan Saved Policy 3.20 dating from 2007. Nevertheless, the proposed development has also been assessed against the requirements of this saved policy. Saved Policy 3.20 requires any building over 30 metres tall to ensure that it:
 - Makes a positive contribution to the landscape; and
 - Is located at a point of landmark significance; and
 - Is of the highest architectural standard; and
 - Relates well to its surroundings, particularly at street level; and
 - Contributes positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.
123. The proposed development would make a very positive contribution to the landscape through the creation of a new public children's open space and high quality landscaping. Improvements would also be provided to the local Ilderton Primary School where the developer has agreed to fund the provision of a green living wall to the Ilderton Road boundary of the school. The green wall was installed last year, and the developer has agreed to cover the full cost (£200k) which shall be collected by the legal agreement. This would be secured by the S106 legal agreement.
124. The proposed tall buildings are at a point of landmark significance, particularly which would mark the close proximity to the South Bermondsey station. The new children's play space would also make a significant contribution to the landmark significance of this location. The site's location adjacent to an important transport hub and the Millwall and consented Surrey Canal development demonstrates that it is located at a local destination and would form part of a cluster of tall buildings in the area. The information submitted with the application demonstrates that the order and scale of development proposed here is consistent with that approved nearby. The towers are appropriately spaced with gaps between them to ensure that the buildings do not converge into a singular mass but would be appreciated as separate towers.
125. Finally, the base of the building is dominated by commercial and retail uses which would animate this proposal along the length of the Ilderton Road frontage. Added to that, the landscaped space at the centre of the site introduces the opportunity for some mature planting and would significantly improve the experience of Ilderton Road. In this way the proposal has responded to its immediate location adjacent to a railway interchange and a football stadium and placed uses that are appropriate to the street-scene.
126. In conclusion on height, scale and massing, the proposed buildings would be consistent with the draft OKR AAP. Officers are satisfied that this proposal complies with saved Policy 3.20, it is of high architectural quality, contributing positively to its street-scene and the

London skyline with its highly articulated and stepped profile.

127. The proposal has evolved to find its place as a mediator between the lower rise established residential buildings to the west, the church and school to the south and the travellers site to the north and the consented high density masterplan to the east in Lewisham.

Architectural design and materiality

128. The towers would be of a high architectural quality. They are embellished with diamond patterned brickwork which ripples across the facade and introduces a dynamic quality to the design. The facades are designed with deep-set reveals as well as a finely delineated verticality. In this way the design appears distinctive and high quality but also contextual, utilising materials that are typical for this part of the borough. The design incorporates low level windows on the façades, windows specifically designed for pets to look out of. This quirky feature adds to the high quality of the design. The details of these elements would all be secured by condition including a requirement for a full scale mock up of a typical bay of the elevation.

Image: Proposed Ilderton Road frontage



129. The top of each tower has a playful shift in its geometry and height adopted as a device to distinguish the height hierarchy of each block whilst also creating a distinct characteristic to the development and the amenity space contained within.
130. The private and affordable units have been designed as tenure blind. All four towers would be of mixed tenure as follows with affordable homes accessed from the same core as private homes. The applicant has confirmed that this arrangement would be satisfactorily managed by a registered social landlord.

Materials

131. The use of brick is particularly contextual in this location, where the majority of buildings are in brick. The brick type would be a red or brown brick laid in a Flemish bond. The balconies would be brick with black steel balustrades. Windows would also be metal framed. The proposed materials are found to be acceptable and a condition will be attached to the draft decision notice to require samples to be submitted.

Design Review Panel

132. An earlier version of the scheme was presented to the Design Review Panel on 13 February 2018. The scheme when it was as reviewed was at pre-application stage and when the scheme was predominantly residential (down to the ground floor) and with a continuous frontage along Ilderton Road (no breaks for landscape or communal amenity). Overall, the Panel generally endorsed the general approach to the redevelopment of the site but raised a number of concerns which are discussed and responded to below.

The public realm

133. The Panel acknowledged that the site could accommodate increased density being close to the South Bermondsey Station but felt the proposal failed to recognise the stress that this places on the ground floor especially the functional requirements of servicing the site, accommodating bikes and bins on the busy road. The also questioned the impact of reducing the numbers of disabled parking spaces compared to the numbers normally required.

Officer response:

134. As a result of the DRP the design was substantially updated and developed to introduce significant public realm and open spaces at ground floor, adjust the uses to introduce appropriate commercial uses at grade and the design of the towers was wholly revised to introduce more realisable and contextual brick cladding. Bike and bin storage were placed in the basement and servicing facilities incorporated into the development.

Ground floor uses

135. The Panel felt the ground and first floor residential units would be severely compromised in terms of its quality of accommodation and outlook. They felt the proposal had not considered or allowed for how the ground floor and the public realm would be used on a day to day basis especially on high stress days including rush hour, refuse collection and match days. The Panel were concerned about anti social behaviour and suggested that commercial uses should be considered on the ground floor.

Officer response:

136. This comment has been fully responded to and addressed by the removal of the ground floor residential units and their replacement with retail Class A1 and commercial Class B1 provision.

Public v private

137. The Panel raised a further issue with the arrangement of the design, especially on the ground floor where they found a confusion between what is defined as public space and what is private amenity. It was made clear that the street frontage should be retained as

public, and the space to the rear as private with adequate defensible space where residential uses are provided at grade.

Officer response:

138. The public v private strategy has been amended during the course of the application to provide greater clarity. As suggested by the Design Review Panel, the children's play space provided on the street frontage would be a publicly accessible space, with the rear play spaces facing the railway embankment as private spaces for communal resident use only.

Communal amenity

139. The Panel stressed the importance of the quality of communal amenity space and especially the requirements of the BRE guidance that a minimum of 50% of this space benefits from at least two hours of direct sunlight on the 21 March/21 September. When they considered the arrangement of private and communal amenity spaces on the ground floor they raised significant concerns over the nature, the quality and the usability of the current proposal and how private amenity spaces had been located on the street frontage while communal amenity space had been located to the rear – and right up to the rear-facing windows of residential units. Added to that, the narrow and severely constrained nature of the communal amenity space to the rear of the site appeared inadequate and inappropriate. Finally, it was unclear how the two roof-top amenity spaces would be accessed and used by residents. The Panel raised significant concerns about the communal amenity and they asked the designers to amend the design to address this issue. They suggested the designers consider other communal uses, such as indoor community space, as well as a more generous communal provision, generally to reflect the scale and ambition of the development overall.

Officer response:

140. As commented above, the children's play space provided on the street frontage would be a publicly accessible space, with the rear play spaces facing the railway embankment as private spaces for resident use only. The applicant significantly revised the rear of the building deleting a two wings of the building that had projected over the two communal play spaces, In addition to make these spaces more secure the applicant revised the core layouts and access arrangements to these spaces ensuring that there is a clear line of site from the communal entrances into the play space, providing passive overlooking and a senses of ownership. Landscaping to the edges of these spaces would also benefit the adjacent SINC on the railway embankment. The applicant has carried out BRE sunlight tests for the amenity spaces proposed in the development. The tests have confirmed that 79.4% of the external amenity space in the proposed development would receive direct sunlight for more than two hours. There would only be some small areas that would not receive two hours of sunlight and these would be adjacent to the railway embankment at both the northern and southern ends of the site. The plans show areas of defensible space around the habitable windows of the rear ground floor located residential units preventing any harmful overlooking. The two roof top children's play spaces have been relocated down to the roof of level 04. In addition, and following the advice of the DRP, four indoor communal and children's play space rooms have now been provided on the ground floor, for all residents to use. These four rooms are generously sized (256.4sqm) and would be in addition to the other amenity and play spaces provided elsewhere on the proposed development.

Architectural expression

141. The Panel had understood that this proposal was a series of towers alternating with lower elements arranged in a line. Architecturally this could be expressed as a series of towers sitting on top of (and set-back from) a common base or as a series of towers each landing on the ground with infill pieces linking them. The Panel would not suggest which the better of the two options was but found that the current proposal was neither one nor the other. For example the criss-cross motif was used on both the towers and the lower buildings and the set-back arrangement of the taller elements did not appear to relate to the design of the towers. They encouraged the architects to establish a clear architectural rationale and to express each element of the composition in accordance with that rationale. In respect of the architectural expression, the Panel were concerned about the feasibility of the criss-cross design. They asked for internal views to demonstrate how these spaces will appear from the within the apartments.

Officer response:

142. The design of the proposed development was amended following these comments. The architectural expression of the lower connecting blocks was revised and would now be of a different character to the taller blocks. The taller blocks have kept the criss-cross diamond brick motif which is not included on the lower connecting blocks to allow for a clear differentiation of the podium base and the towers. Internal views have been provided from the inside of the flats to show the appearance of the diagonal shaped windows from inside; from the images it is clear that the flats would be bright, airy and would also include more traditional shaped windows and doors alongside the diagonal.

Sustainability

143. When they considered the sustainability proposals the Panel felt this aspect of the scheme was poor. Whilst every scheme is expected to deliver above and beyond the minimum Building Regulations requirements in order to comply with GLA policy, a high profile scheme such as this should aim to go beyond the norm which is a highly performing building shell and PVs on the roofs.

Officer response:

144. The energy strategy has been revised to include a CHP plant with PVs. Importantly however, the scheme would be designed to be future proofed to allow connectivity to the South East London CHP (SELCHP) District Heating Network (DHN) when it becomes available in the future. The SELCHP plant is within close proximity (400m away to the east) to the proposed development.

Deliverability

145. Finally, the Panel strongly urged the client and the designers to consider the cost plan and to reassure themselves that this proposal is viable. There are a number of design features of this proposal that are welcomed and supported including: the four unit towers where the normal tower would have at least six units to each core; some apartments that have triple-aspect living rooms; the 650mm thick pre-cast walls with cross-cross windows. These are all defining characteristics of the design which are supported by the Panel but are making the design expensive and are likely to be challenged when the construction cost plan is prepared.

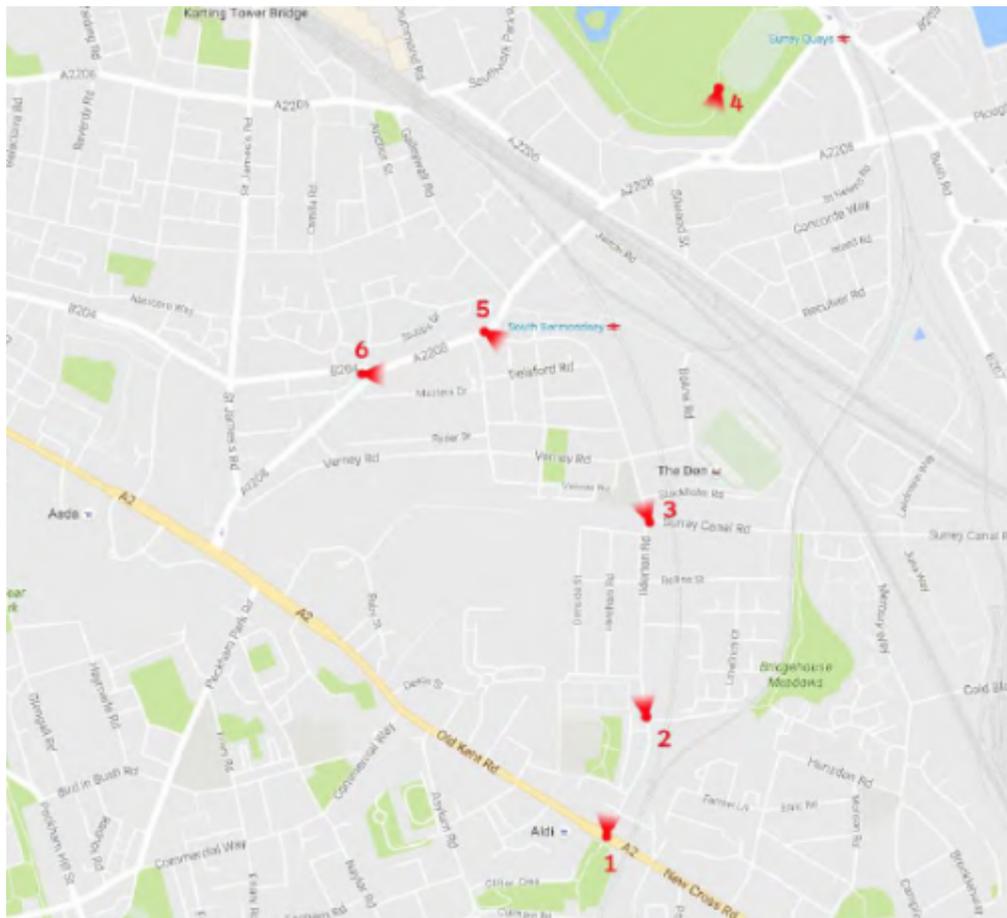
Officer response:

- 146. Most of the cores would include five flats. It is agreed that there are features of the design which would make the build expensive. However it is important that the applicant has committed to the delivery of 35% affordable housing.

Townscape and visual assessment

- 147. The applicant has submitted a Townscape and Visual Impact Assessment with the application. The Assessment considers the impact of the proposed scheme from a number of different viewpoints in the surrounding area as detailed in the following paragraphs.

Image: View locations



View 1:

- 148. Looking north from the southern side of the Old Kent Road at its junction with Ilderton Road. The proposal would not be visible in this view in either the summer or winter.

View 2:

- 149. Looking north on Ilderton Road at its junction with Canterbury Industrial Estate and Hornshay Street. The development would not be visible at all in the summer view, hidden behind a mature street tree. In the winter view it would be glimpsed behind the tree. The proposed material palette and level of detailing proposed would ensure that the building sits comfortably in the far distance with brick being the predominant material. Due to the quality

of the architecture proposed the development would enhance the view as well as provide a wayfinding marker for South Bermondsey Station.

View 3:

150. From the junction of Ilderton Road and Surrey Canal Road looking north. The proposed view shows the development in the far distance behind the modern development already constructed on the western side of Ilderton Road. It also shows the relationship between the proposal and the Ilderton Road Primary School. Similar to the previous view, the use of brick and the quality and variety of detailing means that the proposed development sits comfortably within the context of other brick buildings – particularly the primary school. The tower provides a marker for the station and the quality of the architecture positively enhances the view.

View 4:

151. Looking to the south from Southwark Park. Southwark Park is a Grade II registered Park. In this view the proposed development can just be glimpsed behind the trees to the right of the image. This view shows that even in the winter the proposed development is barely visible beyond the mature trees and existing urban form that surrounds the Park.

View 5:

152. This view is taken from the junction of Ilderton Road and Rotherhithe New Road looking west. The proposed development would appear centrally in this view, stepping down to the north and south. It would provide one of the best positions to fully appreciate the quality of the detailing, materials and form of the buildings. It would also provide a key marker for the station and as a symbol of regeneration of the area. In terms of the travellers' site it would provide a high quality backdrop with the northern most block stepping right down to act as an intermediary and transitional block between the tower and the single storey traveller's homes.

View 6:

153. This view is taken from the junction of Catlin Street and Rotherhithe New Road, looking east towards the site. The view is dominated by the road in the foreground and the mature street trees – even in the winter view. The view demonstrates that the proposals would not be visible in the view.
154. In conclusion, the proposed development would not have a significant impact on the views assessed and the impact is not considered to be harmful. Indeed in many views it is considered beneficial.

London View Management Framework (LVMF) views

155. The site of the proposed development is approximately 4.3 kilometres southeast of the dome of St Paul's Cathedral, and sits approximately 2km beyond the 2A.1 Wider Setting Consultation Area for Protected Vista 2A.1 (London Panorama: Parliament Hill). The effect of the development has been tested in that view.
156. It is clear from the applicant's assessment that the proposed development would not have any significant effect on the setting of St Paul's Cathedral. It is visually separated from St Paul's by a considerable lateral distance in the view, and would sit low in the overall townscape. It would be barely discernible from this viewing location. The form and materials

of the proposed development would preserve the clarity with which the silhouette of the St Paul's Cathedral can be distinguished from its background. It is felt that there would be no harm whatsoever to the view of St Paul's Cathedral.

Borough protected views

157. The proposed development would not be visible within the Borough Protected Views (One Tree Hill and Nunhead Cemetery) and so would not have any impact on their setting.

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

158. There are no conservation areas or listed buildings within a 500m radius of the site, and therefore their special character would not be affected by the proposed development. Two buildings of townscape merit are located at 209-225 Ilderton Road and the Penarth Centre on Penarth Street. These are located at 200m and 190m away respectively and would not be adversely impacted by the proposed development.
159. Historic England confirmed in their consultation response to the application that they do not wish to offer any comments on the scheme.

Trees and landscaping

160. There are no trees or landscape of significance on the site, however enabling pruning work and tree protection measures are required for those off site on the railway embankment, which can be secured by condition. The trees found here are mixed with shrub and Japanese knotweed and it is anticipated that none of these would require removal and only one tree (T20- a Category B tree Sycamore) would require works to its crown.
161. The submitted landscape plan details provision of ten new street trees on the Ilderton Road street frontage. In the event that there is not sufficient space for new trees to be planted here, a s106 payment should be required, charged at £6,000 per tree .
162. A central playspace space would be provided within the proposed development which would include hard and soft landscaping and play opportunities. There are opportunities within this space to provide high quality soft landscaping as well as natural wood chip underneath play equipment and wet play and sand pit provision. As well as this central space, two further landscaped play spaces would be provided adjacent to the railway embankment and would be designed as an extension of the natural railway embankment landscape. The details of the play space provision would be secured by condition, and planning committee would be briefed on the conditions as they come forward for discharge.
163. The landscape proposals would improve the pedestrian experience offering an increased pavement width fronting Ilderton Road. Proposed pavement widths would be between 3.8m - 9.2m. One inset loading bay would be provided, aligned with the footway kerb on Ilderton Road.
164. The Zampa Road frontage would include planting beds, rainwater gardens, with a mixture of shrubs, herbaceous planting and smaller flowering trees to define the route to Millwall Football Stadium, give character to the space and reflect the street hierarchy.

Housing mix, density and residential quality

Housing mix

165. Strategic Policy 7 of the Core Strategy 'Family homes' requires developments of ten or more units to provide at least 60% 2+ bedroom units and 20% 3+ bedroom units. No more than 5% studio units can be provided and these can only be for private housing. At least 10% of the units should be suitable for wheelchair users. The housing mix requirements are replicated in the draft OKR AAP (Policy 5).
166. The proposed housing mix would be as follows:

Table: Housing mix

	No of units	Percentage
Studio	15	4.81%
1 bedroom	109	34.94%
2 bedroom	125	40.06%
3 bedroom +	63	20.19%
Total	312	100%

167. The scheme provides 60.25% of all homes as 2+ bed dwellings and 20.19% as three-bed dwellings, marginally exceeding the policy requirement. No more than 5% of studio units are proposed.
168. For the affordable housing, 88% would be provided as 2+ bed dwellings (74 out of 84), and 51.1% as three-bed dwellings (43 out of 84). No studio units are proposed in the affordable housing mix. This mix considerably exceeds the policy requirement.

Wheelchair housing

169. Saved policy 4.3 of the Southwark Plan requires at least 10% of all major new residential developments to be suitable for wheelchair users and London Plan Policy 3.8 requires 90% of new housing to meet Building regulations M4(2) "accessible and adaptable" and 10% to meet Building Regulations M4 (3) "wheelchair user dwellings". This is reiterated in emerging policy in the draft OKR AAP and the NSP.
170. In total, 32 wheelchair units would be provided which would amount to a 10.2% provision. This meets the policy expectation and therefore can be supported. The wheelchair housing would be distributed across all three tenures with the larger wheelchair units in the social rented tenure which is welcomed. All of the unit sizes for the wheelchair flats would comply with the minimum room sizes as set out within the council's Residential Design Standards SPD. The wheelchair housing mix and the wheelchair unit sizes would be as per the tables below.

Table: Wheelchair provision

	Social rent	Intermediate	Market	Total
1 bedroom	0	0	2	2
2 bedroom	1	8	9	18
3 bedroom	9	3	0	12
Total	10	11	11	32

Table: Wheelchair flat sizes

Unit Type	SPD (sqm)	Size Range (sqm)
1 Bed 2 person (DDA flat)	65	65-66
2 Bed 3 person (DDA flat)	75	88
2 Bed 4 person (DDA flat)	85	85-99
3 bed 4 person (DDA flat)	100	112-129
3 Bed 5 person (DDA flat)	115	122-125

171. The social rented units would be required to be fully fitted for first occupation, with private and intermediate units being adaptable. Subject to the inclusion of the wheelchair clauses in the legal agreement, the wheelchair housing mix would be in accordance the relevant policy.

Density and quality of accommodation

172. Policy 3.4 Optimising Housing Potential of the London Plan states that development should optimise housing output for different types of location within the relevant density range shown in Table 3.2 of the Plan. It also requires local context, the design principles and public transport capacity to be taken into account. Strategic Policy 5 – Providing new homes of the Core Strategy sets out the density ranges that residential and mixed use developments would be expected to meet. As the site is located within the Urban Density Zone, a density range of 200 to 700 habitable rooms per hectare would be sought. In order for a higher density to be acceptable, the development would need to meet the criteria for exceptional design as set out in section 2.2 of the Residential Design Standards SPD.
173. The development as a whole would have an estimated density of 1,751 habitable rooms per hectare (hrh), calculated in accordance with the Residential Design Standards SPD 2011. This has been worked out on the basis of the total non residential floorspace of 2,266.58sqm, a total of 966 residential habitable rooms and a site area of 0.5979 ha.
174. Since the maximum upper limit of 700 hrh would be significantly exceeded, the development would need to demonstrate that it would provide exemplary accommodation to the highest design standards. If it can be demonstrated that an excellent standard of accommodation would be provided, and the response to context and impact on local services and amenity to existing occupiers is acceptable, then it's considered that the high density in this Opportunity Area location would not raise any issues to warrant withholding permission. This is considered in the following table and paragraphs.

Table: Exemplary residential design standards

Exemplary residential design criteria from Southwark Residential Design Standards SPD	Commentary
Provide for bulk storage	<p>All bulk storage requirements would be met as follows:</p> <ul style="list-style-type: none"> • The studio flats would provide at least 1sqm of bulk storage meeting the minimum requirement of 1sqm in the SPD; • The one bed flats would provide at least 1.5sqm, meeting the 1.5sqm requirement in the SPD; • The two bed flats would provide at least 2sqm exceeding the minimum requirement of 2sqm in the SPD; • The three bed flats would provide at least 2.5sqm meeting the minimum requirement of 2.5sqm in the SPD. • The four bed flats would provide at least 3sqm which meets the minimum requirement of 3sqm in the SPD.
Exceed minimum privacy distances	<p>The nearest residential property to the site is 38 Delaford Road which is over 18m away, exceeding the 12m required across a highway in the SPD. The remaining properties are over 20m and there is over 40m to the Ilderton travellers site. As such, there is no concern about harmful overlooking of neighbouring properties.</p>
Good sunlight and daylight standards	<p>Overall, 378 of the 461 habitable rooms tested (82%) would meet the BRE guidelines for ADF criteria.</p>
Exceed minimum ceiling heights of 2.3m	<p>This would be achieved with all of the ceiling heights exceeding 2.3m.</p>
Exceed amenity space standards (both private and communal)	<p>The amenity space proposed is set out in the section on Outdoor amenity space in this report Where the recommended 10sqm private amenity space has not been met, the shortfall has been included as communal amenity space in line with the Residential Design Standards SPD.</p> <p>All private, communal and children's play space requirements would be met on site. A s106 contribution would be collected for the shortfall in public open space and could go towards repaving and greening the footway on the other side of Ilderton Road.</p>

Secure by Design certification	The scheme has been reviewed by the Metropolitan Police's Design out Crime Advisor who has advised that they believe the development to be suitable to achieve Secured By Design accreditation.
No more than 5% studio flats	4.81% of the accommodation includes studio flats, which is under the 5% limit.
Maximise the potential of the site	The scheme includes a significant uplift in commercial provision which includes B1 offices and A1 retail floorspace together with 312 new homes towards the boroughs housing stock.
Include a minimum 10% of units that are suitable for wheelchair users	In total, 32 wheelchair units would be provided which would amount to a 10.2% provision.
Have excellent accessibility within buildings	Step free access would be provided to all parts of the site including access to the retail and commercial units as well as the ground floor children's play areas. There would be views towards the ground floor children's play areas from the entrance lobbies.
Have 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 £492,660 carbon off set contribution as the residential element of the scheme 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.
Minimise noise nuisance between flats by stacking floors so that bedrooms are above bedrooms, lounges above lounges	The submitted plans for each of the floor levels containing residential units show a layout where bedrooms are stacked on bedrooms and this is replicated with living areas on top of living areas. The only exception is the ground mezzanine plan where residential accommodation has been located on top of the ground floor retail and office use.
Make a positive contribution to local context, character and communities	The proposed heights would be in compliance with the draft OKR AAP, the scheme provides for a significant proportion of B1 office and A1 retail provision. In addition, the scheme would provide new homes, new jobs and new shop for local and new residents.
Include a predominance of dual aspect units	85.26% of the total flats would be dual aspect. 93.22% of social rented flats would be dual aspect and 100% of the intermediate flats would be dual aspect. There would be no

	single aspect north facing units.
Have natural light and ventilation in all kitchens and bathrooms	The kitchens would have natural daylight and ventilation as part of an open plan layout. The positioning of the bathrooms is away from majority of window openings therefore not achieving natural light opportunities, but they would be mechanically ventilated.
At least 60% of units contain two or more bedrooms	The scheme provides 60.25% of all homes as 2+ bed dwellings and 20.19% as 3-bed+ dwellings.
Significantly exceed the minimum floor space standards	All flats, including the wheelchair flats would meet the minimum space standards; many would exceed this figure and some to a significant degree.
Minimise corridor lengths by having additional cores (minimising units per core)	The proposed buildings do not include more than seven flats per core. In most instances there would be five flats per core.

175. For the reasons detailed in the above paragraphs and table, the higher density proposed would not compromise the quality of accommodation and the impacts of the proposed development would be acceptable. The residential design quality would not be compromised by the quantum of development proposed; it is therefore considered that the exceedance of the density threshold would not warrant withholding permission.

Unit size

176. Saved Policy 4.2 of the Southwark Plan advises that planning permission will be granted provided the proposal achieves good quality living conditions. The adopted standards in relation to internal layout are set out in the adopted Residential Design Standards SPD 2011 (including 2015 Technical Update).

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

Table: Flat sizes

Unit Type	SPD (sqm)	Size Range (sqm)
Studio	39 (37)	37-44
1 Bed 2 person (flat)	50	50-59
2 Bed 3 person (flat)	61	62-83
2 Bed 4 person (flat)	70	72-95
2 Bed 3 person (duplex)	70	72
3 bed 4 person (flat)	74	79-103
3 Bed 5 person (flat)	86	87-130
3 Bed 6 person (flat)	95	No units
3 Bed 4 person (duplex 2 storey)	84	93-96
3 Bed 6 person (duplex 2 storey)	102	159
4 Bed 6 person (duplex 2 storey)	106	132
4 Bed 7 person (duplex 2 storey)	115	171

178. The above table clearly demonstrates that all the flat sizes in the proposed development would meet or exceed the minimum sizes as required by the SPD. The duplex units are particularly sizable which when taking into account their likely occupation by a family, is a very positive aspect of the scheme.

Dual aspect

179. The percentage of dual aspect units would be excellent at 85.26% This has been achieved as in most cases there would be just five flats per core which is well within the eight units recommended by the Mayor's Housing Design SPG. There would be no single aspect north facing units. This is considered a very positive aspect of the proposals. The table below demonstrates that 93.22% of the social rented flats would be dual aspect and 100% of the intermediate flats would be dual aspect and accordingly the flats in the affordable provision would be achieve a higher level of dual aspect provision when compared to the private.

Table: Dual aspect

	Total units	Dual units aspect	Dual aspect %
Social rented	59	55	93.22%
Intermediate	25	25	100%
Market	228	186	81.58%
Total	312	266	85.26%

Internal daylight and sunlight

180. The submitted daylight report has assessed the light conditions within a representative selection of the proposed accommodation itself, analysing the internal daylight levels to all of the habitable rooms across ground to fourth floor levels, as well as a 10th floor typical upper level.

181. It is important to note that the assessments have been undertaken in the cumulative

scenario (i.e. with the consented Lewisham Surrey Canal Triangle development in place) in order to represent a worst case.

182. In total, 461 rooms have been tested across the scheme, comprising 314 bedrooms, 138 living/ kitchen/dining rooms (LKDs), one living room, three living/dining room (LDs), one studio, two community rooms and two winter gardens.
183. The internal daylight analysis results confirm that 378 of the 461 habitable rooms tested (82%) would achieve the recommended ADF targets for their relevant room uses. In addition to the ADF assessment, the NSL results confirm that 388 out of 461 rooms (84%) would have daylight penetrating to at least 80% of the working plane, which represents excellent daylight potential for an urban regeneration area.
184. Therefore, it can be concluded that the proposed development is anticipated to achieve good levels of daylight.

Overlooking and privacy within the proposed development

185. The distances between the proposed flats would ensure no harmful overlooking would occur. There would be at least an 18m distance between the habitable room windows of differing units which is considered sufficient to mitigate against harmful overlooking and so there are no concerns in this regard.

Number of units per core

186. The Mayor's Housing Design SPG requires that each core should be accessible to generally no more than eight units on each floor. As stated in the Exemplary design standards table, there would be no more than seven units per core (Core 1), with Cores 2, 3 and 4 being accessed by no more than five units per core. This aspect of the scheme is therefore acceptable.

Secured by design

187. The scheme has been reviewed by the Metropolitan Police's Design out Crime Advisor who has advised that they believe the development to be suitable to achieve Secured By Design accreditation, and have recommended the imposition of a condition to require the details of security measures to be submitted and thereafter fitted prior to occupation. This condition has been attached to the draft decision notice.

Conclusion on quality of accommodation

188. To conclude, officers are satisfied that the quality of residential accommodation proposed would be very good and would justify the high density of the scheme. All of the flats would exceed the minimum requirement for floor sizes. The percentage of dual aspect units overall would be 85.26% which is an excellent level of compliance. The accommodation would achieve very good internal daylight levels.

Outdoor amenity space, children's play space and public open space

189. 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 ten sqm per child bed space (covering a range of age groups).

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

- Private amenity space: For units containing three or more bedrooms, 10sqm of private amenity space as required by the SPD; and for units containing two bedrooms or less, ideally 10sqm of private amenity space, with the balance added to the communal space;
- Communal amenity space: 50sqm communal amenity space per development as required by the SPD; and
- Children’s play space: ten sqm of children’s play space for every child space in the development as required by the London Plan.
- Public open space: five sqm of public open space per dwelling as required by the draft OKR AAP. If it is not feasible to deliver the open space on site, a financial contribution will be required.

Private amenity space

191. All but one of the three and four bed flats have been provided with at least 10sqm of private amenity space in the form of balconies or winter gardens. Winter gardens have been proposed along Ilderton Road to mitigate the noise conditions of Ilderton Road. The one exception is a three bed five person flat in Core 3 (Apartment GM_3) which is at 9.83sqm, falling 0.17sqm short. It is felt that this small shortfall to this one flat would not be harmful in this instance. In the case of two bed flats, all have been provided with at least 5sqm of private amenity space.

192. In total, there would be 179.7sqm of private amenity space shortfall based on the 96 flats that do not provide the full 10sqm of private amenity space.

Communal amenity space

193. 50sqm of communal amenity space is required as per the Residential Design Standards SPD, together with the 179.7sqm private amenity space shortfall to total 229.7sqm.

194. The following table demonstrates the provision of communal amenity space within the scheme. As can be seen from the table, a total of 547sqm of communal amenity space has been proposed. This considerably exceeds the requirement of 229.7sqm by 317.3sqm.

Table: Communal amenity space

Location	Amount
Core 01 roof	102sqm
Core 02 roof	225sqm
Core 03 roof	220sqm
Total required 229.7sqm (50sqm +179.7sqm)	Total provided 547sqm (+317.3sqm)

195. In addition, and as a further benefit of the scheme, four communal internal resident’s rooms, accessed by all tenures would also be provided. Two of these have been designed as

children’s play rooms and the other two as communal amenity spaces. In total, these four rooms would be 256.4sqm and would be in addition to children’s play spaces discussed in the following paragraphs later in the report. They have not been included as contributing to the communal space or children’s playspace requirement. The submitted plans for these rooms show they would be fitted out to include furniture, toilet provision and play equipment such as slides and tents. These rooms would be a valuable resource for children’s parties and provide some indoor play opportunities in wet and weather windy conditions.

Table: Internal children’s play and communal amenity rooms

Location and type	Size
Ground floor Core 02 Children’s play room	59.47sqm
Ground floor Core 03 Children’s play room	62.48sqm
Ground floor Core 04 Communal amenity	63.78sqm
Ground floor Core 04 Communal amenity	70.67sqm
Total	256.4sqm

Children’s play space

196. In line with the Mayor's Providing for Children and Young People's Play and Informal Recreation SPG, the development would be required to provide 1331.7sqm of children's play space, based on a calculation (using the latest 2019 playspace calculator) that the proposed development would accommodate 133.2 children, with a requirement for 10sqm of play space per each child. The playspace requirement would be fully met, as demonstrated in the table below.

Table: Children’s amenity space

Location	Amount
Ground floor play space Area 01	277sqm
Ground floor play space Area 02	434sqm
Ground floor play space Area 03	202sqm
Level 04 roof top play space area 04	146sqm
Level 04 roof top play space area 05	155sqm
Level 07 roof top play space Area 06	163 Sqm
Total required 1,331.7 Sqm	Total provided 1,377sqm (+45.3sqm)

197. Details of the type of play facilities for the various age groups have been provided. These include slides, balance blocks, roundabouts, basketball hoops, trampolines and hopscotchs within generous landscape settings. The spaces would be welcoming for children and young people of all ages and abilities, but also for parents and carers as well as any resident of the development. Detailed drawings of the landscape design, including all play provision, would be secured by condition.

198. All of the playspaces would be accessible for all residents in the proposed development.

There is however one exception which is the level 07 roof top play space (Area 06 in the above table). This playspace would be located on the roof of Core 4 and could only be accessed by the flats within that core. The core includes a total of 36 flats where the majority of the flats (22 flats, 61%) would be social rented. Given the level of playspace provision on the ground floors and level 04 of the proposed development, it is not felt that any resident would be disadvantaged by this arrangement.

Public open space

199. In addition to the existing amenity space requirements set out above, the emerging policy AAP10 of the emerging OKR AAP requires the provision of 5sqm of public open space per dwelling. In this case, this would amount to 1,560sqm based on the 312 units proposed. The 434sqm ground floor play area (Area 02) would be fully accessible to the public, leaving a 1,126sqm shortfall for which a s106 off set payment would be required, charged at £205 sqm, totalling £230,830. This could go towards repaving the asphalt pavement on the other side of Ilderton Road to include tree planting which would help to reduce air and noise pollution, achieve greenfield run off rates, and encourage habitat creation. In addition the applicant has agreed to make a further unilateral contribution to greening the playground areas at Ilderton Primary School.

Table: Amenity space proposed against policy requirement

	Policy requirement	Proposal	Difference
Private	3,120sqm (312 flats x 10sqm SPD requirement)	2,960.3sqm	-179.7sqm
Communal amenity	50sqm SPD requirement (+ 179.7sqm shortfall = 229.7sqm)	547sqm	+317.3sqm
Children's play space	1331.7sqm (GLA calculator)	1,377sqm	+45.3sqm
Public open space	1,560sqm (312 flats x 5sqm)	434sqm	-1,126sqm Shortfall s106 payment of £230,830 agreed

200. A brand new open space has been delivered 95m from the site further down Ilderton Road

in between Stockholm Road and Surrey Canal Road. The space has provided in accordance with planning permission ref: 16/AP/1794 for the construction of an underground tunnel to accommodate high voltage cables from the National Grid (new Cross) compound at Orside Street to Surrey Canal Road. The site is owned by Southwark Council. The new open space is approx. 800sqm.

Image: New Ilderton Road Open space



201. The site was used to facilitate construction of the tunnel and associated equipment and following completion of the works it was agreed to be landscaped as an open space with replacement tree planting, new footpaths and hedge planting to provide screening for the Network Rail development. Network Rail will be maintaining the site for five years from 2020-2025. The hoarding is due to come down at the time of writing with accessibility to the public shortly after. An official launch is also planned. The developer has agreed to contribute £25,000 towards the maintenance costs after the initial five years period is up, which would be secured by s106 legal agreement.

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

202. As demonstrated by the table above, sufficient private amenity, communal and children’s play space has been designated to meet all the communal and children’s play space

requirements of the council's SPD as well as the Mayor's Providing for Children and Young People's Play and Informal Recreation SPG as outlined in the table above.

203. 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 of £230,830 in-lieu of providing such space on-site would be expected and will be secured through the Section 106 agreement. This could go towards repaving and greening the footway on the other side of Ilderton Road.
204. 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.

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

Impact of the proposed uses

205. The provision of retail (Class A), commercial (Class B) as well as the introduction residential units to the upper floors (Class C3) is considered to be compatible with the surrounding land uses which include residential, industrial and commercial uses. On this basis, it is considered that the proposed uses would not cause any harm to surrounding neighbour amenities, including the travellers site further up Ilderton Road (40m away), and accordingly are all found to be acceptable uses. Conditions on opening hours and noise have been included on the draft decision notice.

Daylight and sunlight impacts

206. The following section of this report details the potential daylight, sunlight, and overshadowing impacts of the proposed development on surrounding residential properties. This analysis is based on guidance published by the Building Research Establishment (BRE).

BRE daylight tests

207. Guidance relating to developments and their potential effects on daylight, sunlight, and overshadowing is given within the 'Building Research Establishment (BRE) Report 209 Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice 2nd Edition (2011)' (BRE, 2011).
208. The two most common tests for assessing the likely daylight impacts on surrounding, existing properties set out in the BRE Guidelines are the Vertical Sky Component (VSC) test and the Daylight Distribution (DD) test (otherwise known as the No Sky Line (NSL) test). The VSC test calculates the availability of daylight to the outside of a window and the DD test shows the distribution of daylight within a room.
209. The VSC test calculates the angle of vertical sky at the centre of each window and plots the change between the existing and proposed situation. The target figure for VSC recommended by the BRE is 27%, which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE also advise that VSC can be reduced by about 20% of its original value before the loss is noticeable. In other words, if the resultant VSC with the new development in place is less than 27% and/or less than 0.8 times its former value, then the reduction in light to the window is likely to be noticeable.

210. The DD test calculates the proportion of a room from which the sky would be visible, and plots the change between the existing and proposed situation. The BRE advises that if there is a reduction of 20% or more in the area of sky visibility, daylight may be noticeably affected.
211. To assess the likely impact on other proposed new developments where detailed internal layout are available and window positions are finalised, the BRE Guidelines state that the Average Daylight Factor (ADF) test is most appropriate. Accordingly, for surrounding consented residential developments with the potential to be affected by the proposals under consideration here, ADF analysis has been undertaken. ADF provides an absolute measure of daylight expressed as a ratio of daylight for the room in question as a proportion of the daylight outside at any moment in time. The ADF for a living room should be above 1.5% (i.e. the room should enjoy a minimum of 1.5% of the average external daylight at any moment in time), whilst that for a bedroom and kitchen should be in excess of 1% and 2% respectively. Where, at the time the assessment was carried out, the surrounding consented schemes had not yet undergone detailed design or window positions had not been finalised, VSC façade analysis has been undertaken. This calculates the VSC across an entire façade, and the results are presented graphically with areas of high daylight (27%+ VSC) coloured yellow and areas of lower daylight coloured blue/purple.
212. In relation to existing windows with balconies above them, the BRE Guidelines acknowledge that they typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction may result in a large relative effect on the VSC, and on the area receiving direct daylight. They advise that the impact of existing balconies can be demonstrated by carrying out additional PSH calculations, for both the existing and proposed situations, with the balconies notionally removed.

BRE sunlight tests

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

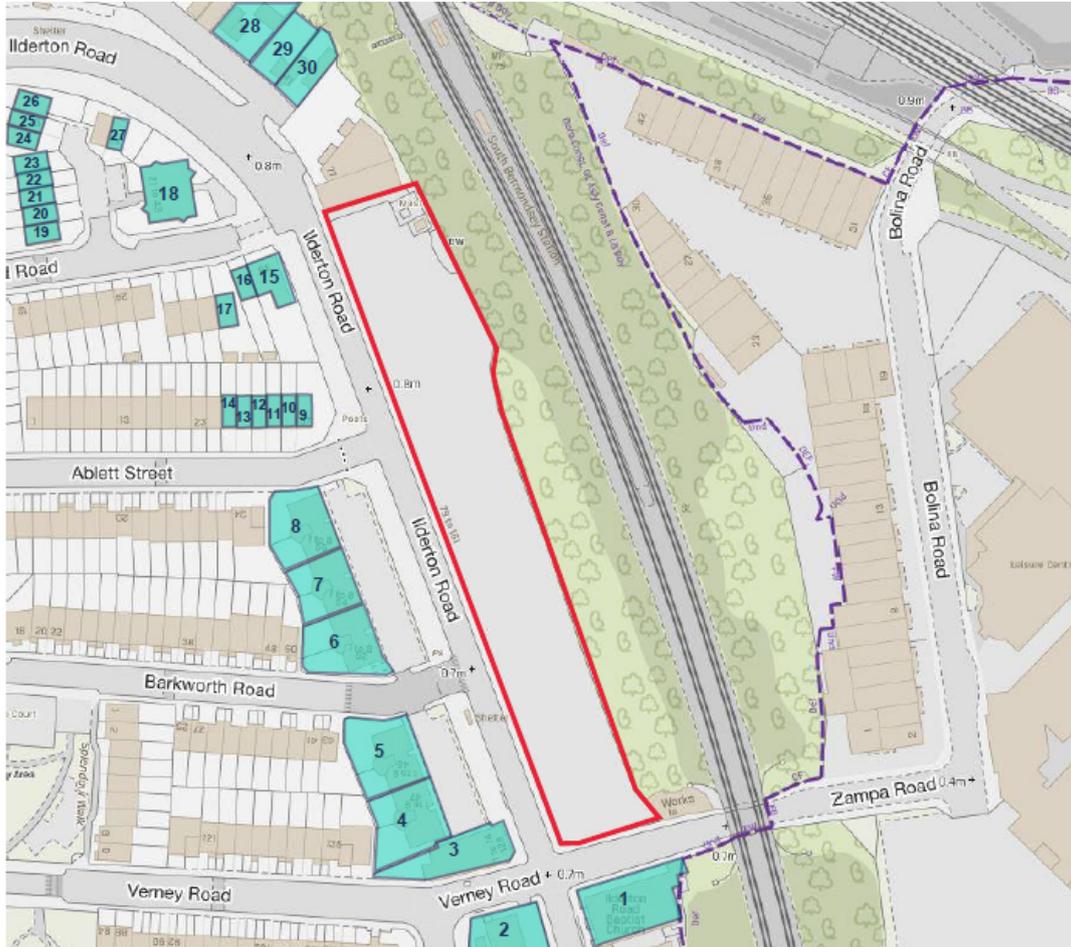
Overshadowing

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

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

216. The BRE advises that at least half of the area tested should receive at least two hours of sunlight on 21 March. If the area which can receive two hours of sun on 21 March is less than 0.8 times its former value, the loss of sunlight is likely to be noticeable. This transient detail is analysed within the daylight and sunlight assessment of this development.
217. The BRE Guidelines are based on a suburban environment, and as such a degree of flexibility needs to be applied when considering an urban environment. They also state that residential properties warrant detailed consideration in terms of daylight and sunlight effects, but that properties of a commercial nature have a lower requirement. Paragraph 123 of the NPPF (2019) states that:
- “Local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).”*
218. It is acknowledged that the proposed development would incur a noticeable relative change in daylight amenity to a number of residential properties surrounding the site, namely 45- 55 Barkworth Road. There are also a large number of residential properties, as well as Ilderton Baptist Church and the Ilderton Primary School that would satisfy the BRE guideline recommendations and therefore experience no noticeable alterations in daylight or sunlight as a result of the implementation of the proposed development.
219. The surrounding properties are mainly of two to four storeys in height, with the majority of those buildings in the immediate vicinity being in residential use. To the south of site is the Ilderton Road Baptist Church and Ilderton Primary School, both of which have been analysed as part of the assessment.
220. Further to the east, on the opposite side of the elevated mainline railway line is the outline consented scheme known as Surrey Canal Triangle (Planning reference: DC/13/085143). Whilst not yet under construction, given the outline planning status of the development, it has been included within the baseline of the submitted technical assessments, and a VSC daylight façade analysis carried out on those elevations that face towards the site to indicate daylight availability following implementation of the proposed development.
221. The undeveloped nature of the existing site is an unusual position for an urban site of this type. As a result, the existing levels of daylight within the surrounding residential properties looking over the site are abnormally high for an urban location; and particularly so for a site on the fringes of an opportunity area where there is an expectation of delivering a development with a significantly greater density than that of the current surrounding context.
222. The following map identifies the properties that were considered in the submitted daylight and sunlight assessment.

Map of properties tested for daylight and sunlight



Key

1. Ilderton Road Baptist Church
2. Ilderton Primary School
3. 128 Ilderton Road
4. 45 Barkworth Road
5. 47 Barkworth Road
6. 52 Barkworth Road
7. 54 Barkworth Road
8. 56 Barkworth Road
9. 37 Ablett Street
10. 35 Ablett Street
11. 33 Ablett Street
12. 31 Ablett Street
13. 29 Ablett Street
14. 27 Ablett Street
15. 38 Delaford Road

16. 36 Delaford Road
17. 34 Delaford Road
18. 21-43 Delaford Road
19. 1 Delaford Road
20. 3 Delaford Road
21. 5 Delaford Road
22. 7 Delaford Road
23. 9 Delaford Road
24. 11 Delaford Road
25. 13 Delaford Road
26. 15 Delaford Road
27. 19 Delaford Road
28. 35-37 Ilderton Road
29. 39 Ilderton Road
30. 41 Ilderton Road

223. In addition to the above properties, an assessment of the outline consented scheme for the Surrey Canal Triangle site was also undertaken to establish any potential effects on the daylight availability to the site facing facades following the implementation of the proposed development. Given the outline planning status of that development, no details are yet available on the room and window locations of the development, and as such a VSC daylight façade analysis was undertaken to indicate the potential for daylight availability on those elevations that face towards the proposed development.

224. The remaining surrounding properties are either too far away to be affected by the implementation of the proposed development or are understood to be of commercial/industrial/non-domestic use and are not considered to have a material expectation of daylight and sunlight amenity and as such are excluded from the assessment. Detailed daylight and sunlight assessments have not therefore been undertaken for those remaining properties.

225. The results of the technical assessment have indicated that the following properties would satisfy the BRE guideline recommendations for both daylight and sunlight and it can therefore be concluded that the proposed development would have a negligible effect on their daylight and sunlight amenity. The list includes no's 35-41 Ilderton Road which are the homes within the travellers site

- Ilderton Primary School
- 27 Ablett Street
- 29 Ablett Street
- 31 Ablett Street
- 33 Ablett Street
- 35 Ablett Street
- 9 Delaford Road
- 15 Delaford Road
- 19 Delaford Road
- 34 Delaford Road
- 35 Ilderton Road
- 39 Ilderton Road
- 41 Ilderton Road
- 47 Ilderton Road, Baptist Church

226. The daylight and sunlight effects upon the remaining properties are discussed in more

detail below.

128 Ilderton Road (no's 1-14)

227. This is a residential block that is located to the south west of the site, at the junction of Ilderton Road and Verney Road.
228. The VSC results indicate that 27 of the 29 habitable windows tested would satisfy the BRE numerical targets either by retaining at least 27% absolute VSC or by retaining 0.8 times their existing values (i.e. less than 20% relative reduction). The remaining two windows serve bedrooms and would experience minor deviations of the BRE numerical targets (23.92% and 20.70%) and would retain absolute VSC levels of 23% and 24.02%.
229. In terms of the NSL form of daylight assessment, the results confirm that each of the habitable rooms tested would satisfy the BRE guidelines such that they would continue to have good daylight distribution within each of the rooms with the proposed development in place.
230. The sunlight analysis confirms that each of the southerly orientated windows would satisfy the BRE guideline targets for both annual and winter sunlight.
231. It is therefore considered that the proposed development would not have a noticeable effect upon the overall daylight and sunlight amenity to this property.

45-56 Barkworth Road

232. As discussed in detail above, the 'existing' outlook of these properties over the undeveloped site facilitates a position whereby any development in accordance with the ambitions of the draft OKR AAP would noticeably breach the typical recommendations in the BRE Guidelines.
233. For example, the average typical existing level of VSC across the building (with unobstructed views over the site) is c.27%, however half of those windows currently have a VSC of over 30%. This is not far off the maximum VSC value for horizontal windows (just above 39% VSC). If the BRE's generic 0.8 reduction factor were to be applied to this existing level of 30% VSC, it would equate to a proposed VSC of 24%. This is close to the BRE's suggested alternative absolute threshold of 27% VSC. To retain these levels of VSC would equate to building within circa a 25° plane over the site. However, this would not align with the intentions of the draft OKR AAP, in respect of which there is clear realisation that a forthcoming development on the site would be significantly beyond the parameters of a 25° plane, with an expectation of delivering buildings that would be noticeably taller than the existing surrounding context.
234. There is a similar position in relation the NSL analysis, as in the existing condition the all of the rooms within this development with the exception of one bedroom record in excess of 80% of their area receiving sky view, with the mean level of sky view penetration being 94% and a number of rooms also recording 100% daylight penetration. This is an exceptionally high level of daylight penetration for an urban setting of this type. As a result, relative changes in NSL exceeding the typical 20% margin in the BRE are again to be expected and are not necessarily indicative of unreasonable levels of retained daylight amenity in the rooms affected.
235. Therefore, the redevelopment of this virtually cleared, low rise industrial site to facilitate

any development in line with the ambitions of the draft OKR AAP would result in windows and rooms in these properties that incur a relative change in terms of their daylight amenity that exceeds the typical parameters in the BRE. As discussed above, in these situations the BRE recommend that it is necessary to instead consider the absolute levels of daylight and sunlight amenity that would be retained.

236. The proposed development has been designed from the outset to allow permeability through the site in order for light to pass between and around the taller elements so as to limit any daylight and sunlight effects to these buildings as much as possible, whilst still achieving a viable design that seeks to deliver the ambitions of the draft OKR AAP.
237. The VSC results confirm that 38 of the 162 habitable windows tested across these two buildings would satisfy the BRE guideline targets. Whilst there are 124 windows that would experience relative reductions of greater than 20%, the following should be noted and taken into consideration:
- 18 of those windows would retain a proposed absolute VSC of between 20.2% and 24.18%;
 - 56 windows would retain a proposed absolute VSC of between 15.1% and 19.69%;
 - 25 windows would retain a proposed absolute VSC of between 10.01% and 14.72%;
 - The remaining 25 windows are located at third floor level where the windows are overhung by the deep overhanging eaves of the roof structure, thus reducing the proportion of the sky that is visible from the centre of the window. As a result, the existing VSC levels are generally lower and the windows are more sensitive to changes in the skyline directly opposite.
238. The vast majority of windows with an unobstructed outlook would retain well above 15% VSC. Whilst there are lower levels of retained VSC recorded by those windows with a more self-obstructed outlook at third floor level, this effect is a consequence of the inherent design of the property; and the lower levels do accord with those seen in similar contexts where outlooks are similarly constrained. The mean retained VSC level for all the residential windows facing over the site within this property is 16.74% VSC, which accords with many urban contexts across London.
239. Finally, in terms of the daylight distribution within those habitable rooms overlooking the site, by reference to the NSL form of daylight assessment, 96 of the 104 rooms tested would satisfy the BRE guideline recommendations.
240. Again, whilst it is inevitable that larger relative reductions would be unavoidable with any meaningful form of development on the site, it is important to look at the retained level of daylight distribution with the proposed development in place, whereby the technical results indicated that each of those eight rooms that would experience deviations from the BRE numerical targets would continue to receive daylight to over 60% of the working plane.
241. For sunlight, each of the southerly orientated habitable rooms overlooking the site will comfortably achieve the recommended BRE annual and winter sunlight targets.

37 Ablett Street

242. The VSC assessment confirms that a total of three of the six habitable windows assessed would satisfy the BRE assessment criteria, either by retaining at least 27% absolute VSC, or by retaining 0.8 times their existing VSC levels.
243. Of the remaining three windows, two would experience minor deviations from the BRE

numerical targets (21.56% and 20.25%) whilst the other is a ground floor window retaining 12.03% VSC in absolute terms.

- 244. All of the six rooms tested satisfy the NSL form of assessment, such that there would remain a good level of daylight distribution within the rooms following the implementation of the proposed development.
- 245. For sunlight, each of the southerly orientated habitable rooms tested would satisfy the BRE guidelines sunlight recommendations.

34 Delaford Road

- 246. The VSC form of assessment confirms that a total of 16 of the 17 habitable windows assessed would satisfy the BRE assessment criteria, either by retaining at least 27% absolute VSC, or by retaining 0.8 times their existing VSC levels.
- 247. The remaining window would experience a relative reduction in VSC of 36.19%, however would retain an absolute VSC of 18.21% and the room it serves would also satisfy the NSL form of daylight assessment.
- 248. All of the eight rooms tested would satisfy the NSL form of assessment, such that there would remain a good level of daylight distribution within the rooms following the implementation of the proposed development.
- 249. For sunlight, each of the southerly orientated habitable rooms tested would satisfy the BRE guidelines sunlight recommendations.

36 Delaford Road

- 250. The VSC form of assessment confirms that a total of two of the six habitable windows assessed would satisfy the BRE assessment criteria, either by retaining at least 27% absolute VSC, or by retaining 0.8 times their existing VSC levels.
- 251. Each of the remaining 4 windows would experience minor deviations from the BRE numerical targets (between 23.83% and 24.8%). The windows would also retain VSC levels of between 15.85% and 23.08% in absolute terms.
- 252. All of the six rooms tested satisfy the NSL form of assessment, such that there would remain a good level of daylight distribution within the rooms following the implementation of the proposed development.
- 253. For sunlight, each of the southerly orientated habitable rooms tested would satisfy the BRE guidelines sunlight recommendations.

38 Delaford Road

- 254. The VSC assessment confirms that a total of three of the 11 habitable windows assessed would satisfy the BRE assessment criteria, either by retaining at least 27% absolute VSC, or by retaining 0.8 times their existing VSC levels.
- 255. The remaining eight windows would experience relative VSC reductions of between 22.24% and 48.45%, with retained absolute levels of VSC of between 13.96% and 23.88%.

256. Seven of the nine habitable rooms tested satisfy the NSL form of assessment, such that there will remain a good level of daylight distribution within the rooms following the implementation of the proposed development. The two remaining rooms will experience minor deviations from the NSL targets, with relative reductions of 23.1% and 20.3%.
257. For sunlight, each of the southerly orientated habitable rooms tested would satisfy the BRE guidelines sunlight recommendations.

21-43 Delaford Road

258. The VSC assessment confirms that a total of 37 of the 45 habitable windows assessed would satisfy the BRE assessment criteria, either by retaining at least 27% absolute VSC, or by retaining 0.8 times their existing VSC levels.
259. The remaining eight windows would experience relatively minor deviations from the BRE numerical targets (between 21.47% and 33.16%) with retained absolute VSC levels of between 11.9% and 21.4%.
260. All of the 39 rooms tested would satisfy the NSL form of assessment, such that there would remain a good level of daylight distribution within the rooms following the implementation of the proposed development.
261. For sunlight, each of the southerly orientated habitable rooms tested would satisfy the BRE guidelines sunlight recommendations.

13 Delaford Road

262. The VSC form of assessment confirms that a total of ten of the 13 habitable windows assessed would satisfy the BRE assessment criteria, either by retaining at least 27% absolute VSC, or by retaining 0.8 times their existing VSC levels.
263. The remaining three windows serve a room that is lit by seven other windows, all of which meet the BRE guideline targets. In addition the NSL to that respective room would also meet the BRE guideline recommendations such that the overall room would not be noticeably affected by the proposed development.
264. All of the 4 rooms tested would satisfy the NSL form of assessment, such that there would remain a good level of daylight distribution within the rooms following the implementation of the proposed development.
265. For sunlight, each of the southerly orientated habitable rooms tested would satisfy the BRE guidelines sunlight recommendations.

11 Delaford Road

266. The VSC form of assessment confirms that a total of 10 of the 12 habitable windows assessed would satisfy the BRE assessment criteria, either by retaining at least 27% absolute VSC, or by retaining 0.8 times their existing VSC levels.
267. The remaining two windows serve a room that is lit by seven other windows, all of which meet the BRE guideline targets. In addition the NSL to that respective room would also meet the BRE guideline recommendations such that the overall room will not be noticeably affected by the proposed development.

268. Three out of the four rooms tested would satisfy the NSL form of assessment, such that there will remain a good level of daylight distribution within the rooms following the implementation of the proposed development. The one remaining rooms experiences a 30.3% reduction, although the room will still receive daylight to over 60% of the working plane.
269. For sunlight, three of the four southerly orientated habitable rooms tested would satisfy the BRE guidelines sunlight recommendations. The remaining room is believed to be a first floor bedroom which would achieve 19% Annual Probable Sunlight Hours (APSH) annually, however would experience a total loss of winter sun when compared to the 1% winter APSH it receives currently.

1-7 Delaford Road (odds)

270. The VSC assessment confirms that a total of 40 of the 51 habitable windows assessed would satisfy the BRE assessment criteria, either by retaining at least 27% absolute VSC, or by retaining 0.8 times their existing VSC levels.
271. The remaining 11 windows each have very low existing levels of VSC such that even modest alterations (between 0.52% and 1.48%) manifest themselves a disproportionately larger relative reductions (between 22.09% 34.20%).
272. In addition all of the rooms tested would satisfy the NSL form of assessment, such that there would remain a good level of daylight distribution within the rooms following the implementation of the proposed development.
273. For sunlight, each of the southerly orientated habitable rooms tested would satisfy the BRE guidelines sunlight recommendations.

Surrey Canal Triangle Outline Consented Scheme

274. The results of the VSC façade analysis illustrate that with the proposed development in place, the daylight availability to the facades of the Surrey Canal Triangle development would remain excellent for an urban regeneration site, with absolute levels of VSC availability even at the lowest levels in in excess of 20-25%. Further up the development there would be increased levels of daylight availability in excess of 30% (with the maximum available being c.39%).
275. It is therefore demonstrably the case that the daylight availability to the Surrey Canal Triangle development would not be detrimentally affected by the implementation of the proposed development.

Overshadowing assessment of proposed external amenity spaces

276. In terms of the sunlight potential available within the proposed development itself, the submitted assessment shows the areas of amenity space within the proposed development that receive at least two hours of sunlight on 21 March. The results indicate that 79.4% of the external amenity spaces would receive direct sunlight for in excess of two hours, thus satisfying the BRE guideline recommendations. There would only be some small areas of the amenity space that do not receive at least two hours of direct sunlight, which are the external garden areas located at the southern end of the central amenity area, and some small areas of rear garden space adjacent the railway embankment at both the northern and southern ends of the site.

277. The BRE guidelines also state that it can often be helpful to undertake sun on ground analysis during the summertime as that would show the reduced shadowing then, and therefore the same position has also been assessed on 21 June (summer solstice). Those results indicate that during the summer months there would be heightened sunlight availability across the development, when arguably the spaces will be most actively utilised by the future occupants, with 94.6% of the external amenity space receiving at least two hours of direct sunlight.
278. Further detailed analysis illustrates the cumulative effect of the Surrey Canal Triangle consented outline development on the sunlight availability to the external amenity spaces within the proposed development. The results indicate that there would be minimal further effect on the sunlight availability to the external amenity space, with 76.2% of the area receiving at least two hours of direct sun on 21 March, with 92.5% on 21 June.
279. It can therefore be demonstrated that the proposed development has been designed to ensure that the recommended levels of direct sunlight are achieved on the external amenity areas.

Overshadowing of surrounding properties

280. A transient overshadowing assessment was submitted to consider the impact of the overshadowing from the proposed development. The overshadowing diagrams submitted are shown at hourly intervals on March 21 (spring equinox), June 21 (summer solstice) and December 21 (winter solstice).

281. 21 March

The transient overshadowing assessment drawings for March show that whilst there would be some additional overshadowing on the properties to the west of the site between the hours of 7am and 9am, the shadow path is fleeting with no extended periods of shadow on the surrounding properties and their gardens. Furthermore, from the existing scenario diagrams at these early times in the day the existing buildings themselves already cast notable shadow on their own rear gardens and therefore it is unlikely that any of the additional overshadowing caused by the proposed development would be noticeable. By 11am, there would be some additional shadowing on the mobile homes immediately to the north, however again by 12pm the shadow has moved beyond those properties and so there would be sufficient access to sunlight availability for the remainder of the day.

282. 21 June

On 21 June, when the sun is highest in the sky and the sunlight availability is at its greatest, the transient overshadowing drawings indicate that again there would be some additional overshadowing in the early hours of the day (between 6am and 9am), however on comparison of the existing and proposed shadow plots, it is evident again that the majority of gardens to the west of the site are already in shadow between the hours of 6am and 8am. Any additional overshadowing caused by the proposed development thereafter, is limited to rear gardens of the Delaford Road properties, however these shadows pass quickly such that there would be no shadowing on the rear gardens for longer than a few hours. Given the height of the sun at this time, the length of shadows at midday are short, and therefore there would be no overshadowing on the mobile homes to the north of the site and then overshadowing to the east in the latter parts of the day will be limited and fleeting.

283. 21 December

The transient overshadowing drawings in December illustrate that understandably given the low angle of the sun at this time of year the majority of the properties to the west of the site are already in extensive shadow for the majority of the day as a result of their own buildings. Any additional overshadowing is unlikely to be noticeable. Whilst the length of the shadows are longer in the winter months the transient nature of the shadow is such that there are no areas around the site in extended shadow for any prolonged periods of the day.

284. Overall, whilst there would be additional overshadowing caused by the proposed development given the existing cleared site condition, it is evident from the transient overshadowing assessments that any areas in shadow would not be in shadow for long periods of the day, and the most noticeable areas of additional shadow are in the morning, when the existing rear gardens of the properties to the west of the site are already in shadow caused by their own buildings and therefore any additional shadow caused by the proposed development is unlikely to be noticeable to any degree, and certainly not for any long period of time throughout the day.

Overlooking of neighbouring properties

285. In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear.
286. The nearest residential properties are located across the road from the site on the other side of Ilderton Road and further to the north of Ilderton Road at the Travellers site. These comprise 38 Delaford Road, 37 Ablett Street, 45-47 Barkworth Road, 52-56 Barkworth Road, 128 Ilderton Road and the travellers site at 35-41 Ilderton Road. The distances to these properties exceed the minimum privacy distances in the SPD. The nearest residential property to the site is 38 Delaford Road which is over 18m away, exceeding the 12m in the SPD. The remaining properties are over 20m and there is over 40m to the Travellers site. As such, there is no concern about harmful overlooking of neighbouring properties.

Transport considerations

287. In assessing this application from a transport perspective, the site is located in an area that the council is considering pedestrian, cycle and bus improvements changes to enable healthy streets. The proposals would enable these plans to be delivered.

Site plan

288. The site has a Public Transport Accessibility Level of three on a scale of 1 to 6b where 1 indicates low accessibility and 6b excellent accessibility. It should be noted that the site is less than 50m walk from the South Bermondsey station). The site is also close (460m) to the proposed New Bermondsey on Surrey Canal Road in Lewisham which is on the London Overground network. The site does not lie in a Controlled Parking Zone (CPZ).
289. Whilst the site has a current PTAL of 3, expected to rise to 4 subject to the opening of, and anticipated location of stations on, the proposed Bakerloo Line Extension (BLE). In advance of the BLE, accessibility is provided by one bus service on Ilderton Road and two bus services on Rotherhithe New Road, and by rail services from Bermondsey South Station.

290. Saved Policy 5.2 of the Southwark Plan seeks to ensure that developments do not result in adverse highway conditions; saved Policy 5.3 requires the needs of pedestrians and cyclists to be considered and 5.6 establishes maximum parking standards.
291. Southwark have recently adopted their Movement Plan, a people, place and experience approach to transport planning rather than modal one. This application has been assessed on how will contribute to the nine Missions.
292. The Mayors Transport Strategy (MTS) includes three strategic challenges that are of significant importance to assessing this application.
- Vision Zero
 - Healthy Streets
 - Air Quality.
293. The submitted Transport Assessment (TA) 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.
294. Officers have reviewed this application and identified the following areas for detailed comments:
- Access and Road Safety – The safe movement of all modes entering and exiting the public highway.
 - Trip Generation –The existing and proposed trips related to the site.
 - Servicing and Delivery – How the development would manage the vehicular trips required.
 - Car Parking - How the development will manage the vehicular trips required.
 - Public Transport – Current access and future potential.
 - Active Transport – Walking and cycling and behaviour change.

Existing site layout

295. The site is located along the eastern side of Ilderton Road and is bound to the north by a car washing business, to the east by the railway line and to the south by Zampa Road. The site was previously occupied by RS Joyner & Son who used the open yard space to store second hand lorries and vans.
296. There is a bus stop located directly in front of the site.
297. The kerbside is currently not controlled and is utilised by various businesses to park vehicles. This does not contribute to a pedestrian friendly environment.
298. Millwall Stadium is accessed from Zampa Road and on match days there is a lot of extra vehicle movements in the area. The rear of the site is bounded by the railway.

Future site layout

299. The proposed future site layout would improve the pedestrian movement by wider footways. The proposed access arrangements and loading bay would be detailed up as part of the S278 agreement.

- 300. The proposed new loading bay would be sited to ensure the P12 bus route will not be impeded.
- 301. All works within the extent of the S278 for Southwark would be done in accordance with Southwark Street Design Manual SSDM and TfL's Healthy Streets design guidance.

Trip Generation

- 302. The proposed development is estimated to generate the following daily trips:

		Motorised Vehicular Trips
	Residential motorised vehicle trips	23
	Non residential	8

Servicing and delivery

- 303. The proposal includes provision of off street servicing from Ilderton Road.
- 304. The council would also consider an additional loading bay on Ilderton Road the exact location of which would be agreed within the S278 agreement.
- 305. Refuse stores would be located at basement level within the development. The refuse collection would be from Ilderton Road and the bin stores would be located within ten metres of the kerb. The bins would be brought to ground floor level by lift and would then wait in a temporary holding area on the Ilderton Road frontage for collection.
- 306. In order to ensure that on-street servicing and deliveries do not negatively impact on the highway network, the council is recommending that applicants in the Old Kent Road Opportunity Area enter into Delivery Service Plan Bonds against their baseline figures for all daily servicing and delivery trips. These bonds would be calculated at £100 per residential unit and £100 per 500 sqm of non-residential floor-space. In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, this is not intended as a financial penalty, but as a means of mitigating any harmful impacts from the proposed development and ensuring a better quality of life for current and future residents. As such, it is considered to meet the CIL Regulations 122 test, in that it would be:
 - 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.
- 307. 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 two years from 75% occupancy. If the site meets or betters its own baseline target the bond would be returned within six months of the end of the monitoring period. If the site fails to meet its own baseline the bonded sum would be made available for the council to utilise for sustainable transport projects in the ward of the development. The council would retain £1,600.00 for assessing the quarterly monitoring. The bond in this instance would be £31,900.00 based on the 312 residential units and 2,227sqm of non residential floorspace. The applicant has agreed to the contribution which can be collected via the legal agreement.

Type	Quantum	Bond Amount
Residential	312	£31,200.00
Non Residential	2,227 sqm	£500.00
Daily Trips	31	£31,700.00

308. All of the proposed uses in the development would be subject to a condition on the marketing and promotional material to ensure this is explicit in how the development has been designed to discourage private cars and encourage sustainable living, working and visiting.

Car parking

309. The site is not located in a designated Controlled Parking Zone and there are sections of unrestricted on-street parking available in the immediate vicinity of the site. However the area around the junction is restricted by yellow lines that prevent parking from 0800-1830 Monday to Saturday.
310. The existing site was used to park freight vehicles which will not return.
311. The proposed development would be car-free and no general car parking would be provided. There would however be two on-site parking spaces for Blue Badge holders as well as a loading area located to the north of the site this will be accessed via a new footway crossover from Ilderton Road. Swept path analysis has been provided to demonstrate a ten m manoeuvring to enable exiting onto the public highway in forward gear.
312. An S106 obligation would be included that prevents future residents or occupiers of the proposed development from obtaining resident parking permits for any future CPZ.

Public transport

313. Buses

The site has convenient access to the P12 bus route linking Canada Water to Peckham via the Old Kent Road, which calls at the stops on both Ilderton Road and Old Kent Road which are understood to provide capacity for approximately 60 passengers (including standing capacity) during morning and evening peak.

314. As a borough it is agreed that bus services would 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 is 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. A contribution for this site has been agreed as £2,700 per residential unit, in line with other developments in the Old Kent Road. This would be secured by the S106 legal agreement.
315. Within the next ten years the site is likely to benefit from the Bakerloo Line Extension, and the site would be in walking distance of both proposed new stations.

Active Transport

316. Walking and the public realm
The submission includes a Pedestrian Environment Review System (PERS) audit which was carried out in July 2018. It includes consideration of the impact of Millwall FC.
317. The application provides for wider footways which would increase the existing 1.72 to 1.92m pavement by up to 9.2m in some instances along the Ilderton Road. This would be delivered through the S278 agreement.
318. The site would be in close walking distance of the proposed new Linear Park and the Bonamy Liveable neighbourhood.

Cycling

319. The site is located close to Quietway 1 and would be on the proposed new Rotherhithe to Peckham cycle route.
320. The application provides cycle parking of 596 long stay and 62 short stay cycle parking spaces for the proposed development. Of these spaces, a total of 5% of the residential spaces would be adapted for larger cycles. This meets and exceeds the requirements of the emerging New Southwark Plan and the standards in the Draft London Plan (which require one space per one bedroom dwellings, two spaces per two or more dwellings and one visitor space per ten dwellings). In addition, nine Brompton bicycle lockers located at basement level will allow residents and visitors to hire bikes from site. A condition is recommended for detailed design.

Table: Residential cycle parking

Development mix		Minimum cycle parking (spaces)	
		Long stay	Short stay (visitor)
Studio/1 person 1 bed	15	15	32
2 person 1 bed	109	164	
2 bed	125	250	
3+ bed	63	126	
Total	312 units	555	32
Retail (A2-A5) (NIA)	437sqm	2	22
Commercial (B1) (NIA)	1,760sqm	39	8
Total		596	62

321. The S106 Agreement would include a contribution towards the delivery of a new Cycle Hire Docking station of £50 per residential unit.

Construction management

322. A Draft Construction Traffic Management Plan has been prepared as a standalone document to be submitted along with this application.
323. The Section 106 would secure a detailed Construction and Environmental Management Plan CEMP and a £40 per unit contribution for Construction Management within the OKR

AAP area. This is for the council to manage cumulative impacts on the highways and environment.

Conclusion on transport

324. This proposal is supported because it reduces car dependency, which would contribute to the impacts of climate change and to the delivery of some of the Movement Plans nine missions, in particular Vision Zero and Healthy Streets and allows for the emerging plans for the surrounding public highway to be facilitated.

Archaeology

325. The site is within the 'Bermondsey Lake' Archaeological Priority Zone and the proposed development includes a basement in the design. There is sufficient information provided in the submitted desk based assessment to establish that the development is not likely to cause such harm as to justify refusal of planning permission provided that the council's standard archaeology conditions are attached to any grant of planning permission.

Wind and microclimate

326. A Pedestrian Wind Microclimate Study was submitted with the application to consider the impact of the proposed development on the local wind microclimate. This involved a 1:300 scale model of the proposed development being tested in the wind tunnel. Three configurations were tested which included:

- Scenario 1 – existing baseline.
- Scenario 2 – existing baseline plus 79-161 Ilderton Road proposal.
- Scenario 3 – cumulative schemes plus 79-161 Ilderton Road. The identified cumulative scheme that fell within the extent of the wind tunnel model is the Surrey Canal Triangle scheme, Surrey Canal Road, London, SE14 in Lewisham (Planning reference DC/11/76357/X).

327. Scenario 1 – Existing Baseline

The results from the existing baseline scenario show all the tested critical outdoor trafficable locations did not experience any wind effects that may affect occupant comfort and/or safety for the worst-case winter period.

328. Scenario 2 – Existing Baseline plus 79-161 Ilderton Road Proposal

The results of the study for Scenario 2 indicate that wind mitigation would be required on the basis of strong winds which would exceed the relevant criteria for comfort and/or safety. Ameliorative treatments have been proposed to overcome the wind conditions such as tree and shrub planting on the ground floor and end screens to upper level balconies to the north and south facing balconies. Tree planting would also be required to the roof top communal play spaces.

329. With the inclusion of these treatments to the final design, it is considered that wind conditions within and around the development would be suitable for their intended uses. In order to secure the mitigation, a condition has been imposed on the draft decision notice as part of the landscaping condition, requiring details to be submitted and approved.

330. Scenario 3 – Cumulative Schemes plus 79-161 Ilderton Road Proposal

The results of the study show that the forthcoming developments in Scenario 3 reduce the winds for the trafficable areas assessed. The incorporation of the mid to high rise buildings in the Surrey Canal Triangle scheme to the east and south-east of the Ilderton Road proposal would provide effective shielding from winds to the north-east and east.

331. Subject to the imposition of a wind mitigation condition, the impacts of the scheme on the local wind microclimate would be acceptable.

Flood risk and water resources

332. The site lies in Flood Zone 3 and is located within an area benefitting from River Thames flood defences. Whilst the site is protected by the Thames Tidal flood defences up to a 1 in 1000 (0.1%) chance in any year, flood modelling (December 2017) shows that the site is not at risk if there was to be a breach in the defences. Therefore, the development would be at low risk of flooding. The Environment Agency initially objected to the scheme but subsequently withdrew its objection and recommended the imposition of a series of flood risk conditions to be imposed in the event that planning permission is granted. These have been included in the draft decision notice. It is important to note that no sleeping accommodation has been proposed at ground floor level.

333. The council's flood and drainage team reviewed the application and have advised that they are satisfied with the scheme, including the basement waterproofing measures proposed. The applicant has also prepared a draft Flood and Evacuation Plan setting out appropriate actions to be taken in the event of flooding or receipt of a flood warning. The scheme has the potential to achieve greenfield rates of run off through the provision of softly landscaped areas at grade, biodiverse roofs and the provision of rain gardens. In the event that it cannot (to be determined through the submission of a detailed drainage strategy requested by condition), the applicant has agreed to pay a s106 shortfall contribution calculated at £366 per cubic meter. This can be collected by the S106 legal agreement.

Ground conditions and contamination

334. A Phase 1 Geotechnical and Environmental Desk Study has been submitted with the application. It states that there is a moderate risk of asbestos, metals and other contaminants at the site. Japanese knotweed is also present. A site contamination condition has been recommended by the council's Environmental Protection team to satisfactorily remove the contaminants and this has been imposed on the draft decision notice.

Fire safety

335. The applicant has prepared a Fire Safety Statement which presents a summary of the fire precautions and measures provided for the design and construction to meet the requirements of the building regulations. A condition has been attached to the draft decision notice to require details of the sprinkler system to all the commercial units to be submitted and approved. All of the residential units would also have a sprinkler system.

Air quality

336. The submitted Air Quality assessment has demonstrated that future residents of the proposed development would experience acceptable air quality, with the proposed energy

plant and local road traffic below the air quality objectives.

337. During the construction works, a range of best practice mitigation measures would be implemented to reduce dust emissions, and these would be included in the Construction Management plan for the works.

Noise and vibration

338. A noise and vibration report has been submitted with the application. It details the carrying out of a noise survey which has taken into account the impact from Millwall FC Stadium. Based on typical stadium noise levels during a football match, there is a low likelihood of adverse impacts to future residents at the proposed development.
339. Triple glazed windows are proposed which would mitigate against the road traffic and railway noise and all apartments would be mechanically ventilated.
340. An assessment was also carried out to determine the likely impact of noise break out from the Christ Apostolic Church at Ilderton Road (14m away) because of gospel music events that take place during weekday evenings and Sundays. It was found that the double glazed windows to the residential accommodation would mitigate against these noise sources.
341. The council's Environmental Protection team have reviewed the submission and have recommended approval subject to the attachments of conditions relating to construction management, submission of a ventilation scheme and a condition requiring the residential accommodation to achieve set internal noise levels.

Health

342. As part of the planning submission, a Health Impact Assessment (HIA) scoping exercise was commissioned to investigate any potential health risks to the community but also to appraise the health and wellbeing impact from the construction and operation of the proposed development. The construction of the proposed development has been stated to take two and a half years and impacts would be mitigated through the submission of a construction management plan.
343. The council's public health team have reviewed the submission and have welcomed the attention that has been given towards incorporating green spaces, and the adequate provision of affordable housing (35.61%) with a mix of private, social and intermediate tenures. They have recommended that there should be equal access across all tenures to all facilities and services such as playspaces and this has been achieved. They have asked the applicant to deliver affordable workspace and this has also been achieved and would be secured by the legal agreement.

Sustainable development implications

Energy

344. Policy 5.2 of the London Plan requires major developments to provide an assessment of their energy demands and to demonstrate that they have taken steps to apply the Mayor's energy hierarchy. Policies 5.5 and 5.6 require consideration of decentralised energy networks and policy 5.7 requires the use of on-site renewable technologies, where feasible. The residential aspect of the proposal would be expected to achieve zero carbon, and the commercial aspect a 35% reduction against part L of the Building Regulations

2013.

345. The applicants have submitted an Energy Strategy for the proposed development which seeks to demonstrate compliance with the above policies.

Be lean (use less energy)

346. Following the energy hierarchy, the first stage (Be Lean) of the design has focused on enhanced passive design measures and incorporates active design measures to reduce energy consumption and CO2 emissions. The following summarises the demand reduction measures which have been included within this scheme:
- Enhanced fabric efficiency of the building envelope
 - Air tightness better than Part L 2013 standards
 - High efficiency lighting systems
 - Highly efficient plant and systems
347. This provides an approximate 11.9% saving compared against the Part L 2013.

Be clean

348. The second stage of the energy hierarchy (Be Clean) has included for the incorporation of a Combined Heat and Power (CHP) Unit which would provide heating and domestic hot water to the domestic and non-domestic areas of the site. The CHP unit would be located within a centralised plantroom located in within the basement. This stage would provide a further 27.1% saving compared to Part L 2013.
349. The development would be future proofed to allow connectivity to the South East London CHP (SELCHP) District Heating Network (DHN) when it becomes available in the future, and it is estimated that this could be in the period between 2021-2023. This would be secured through the Section 106 Agreement. Connection to SELCHP would give rise to much lower emissions than the on site CHP system. The applicant has directly engaged with Veolia as operators of SELCHP and provided copies of correspondence indicating their intention to connect to the plant. SELCHP provides a low carbon intensity through the supply of waste heat and Veolia are currently working on plans to incorporate further low carbon technologies in due course to achieve zero carbon emissions by 2050. SELCHP aims to supply heat to as many properties as possible embracing existing and new build.

Be green

350. The third stage of the energy hierarchy (Be Green) included for a feasibility analyses of low to zero carbon technologies applicable for the site. From this it was found that the adoption of photovoltaic panels is most appropriate for the site, amounting to a 0.7% further saving. 95sqm of photovoltaics are proposed on the roof of Cores 1 and 4. Other low to zero carbon technologies were discounted due to them posing as competition to the on-site CHP and limited ground and roof space.
351. After implementation of the energy hierarchy the residential areas would achieve a 39.7% carbon reduction against Part L 2013 Building Regulations, falling short of the zero carbon target. The non-domestic areas achieve a 37% reduction against Part L 2013 Building Regulations, this exceeds the London Plan target of 35% in line with the GLA's guidance.
352. Recognising that the residential aspect falls below the policy requirements in relation to carbon savings, a contribution towards the council's carbon offset fund would be required. Calculated on the basis of £1,800 per tonne, the residential component would generate a

contribution of £439,923. The applicant has agreed to make the contribution of £439,923 to the carbon off set fund which would therefore make this aspect of the scheme fully policy compliant. As noted above, should the proposed development be able to connect to the SELCHP plant it is envisaged that this sum would have the potential to decrease as the emissions from SELCHP would be significantly lower than the on site CHP system. No payment would be required into the carbon off set fund for the commercial element of the scheme since the 35% target is reached.

353. The carbon offset fund could be used for the installation of PV panels on existing buildings, insulation, energy efficient street lighting, tree planting, LED lightbulb exchanges, homeowner grants to replace boilers, funds for community led- projects etc.

Overheating

354. The submitted energy statement has included an overheating analysis to demonstrate that the proposed residential accommodation on the top floor of the proposed building would mitigate overheating.
355. Flats on the east, and west of the building would incorporate shading methods into the facade design. Biodiversity roofs have been adopted within the development. These would help to moderate peak heat loads during the summer. The design has includes masonry elements within the construction, the thermal mass of these elements would help to moderate heat transfer throughout the year.
356. Mechanical ventilation would be provided to each dwelling to allow the capability of heat recovery during winter months, in order to reduce heat demand.
357. An overheating study was undertaken to enable the site to mitigate the risk of overheating through the use of natural ventilation and strategic facade design.

BREEAM

358. 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 for the retail and office areas. This meets the policy requirement. A planning condition is recommended to secure that the 'excellent' rating would be achieved prior to the fit out of the commercial premises.

Ecology

359. A Preliminary Ecological Appraisal has been submitted with the application. The report refers to site surveys that were carried out in October 2016 and again on June 2017.
360. South Bermondsey Railway Embankments Site of Importance for Nature Conservation (SINC) is located to the east of the site. The embankments are also designated as Borough Open Land. This designated site is unlikely to be directly impacted by construction works but may be affected by dust, debris, light and noise during construction. When operational, the designated site may be affected by lighting. A Construction and Environmental Management Plan (CEMP) will be produced that will detail measures to minimise these potential impacts.
361. The site itself is considered to be of no importance for protected species or other species of conservation interest, and the redevelopment is therefore considered highly unlikely to have any significant adverse impacts on local biodiversity. The adjacent railway

embankment SINC is considered to have potential to support invertebrates, reptiles, breeding birds, foraging and commuting bats, Badgers and Hedgehogs. The CEMP will include measures to minimise impacts on the SINC arising from construction activities, including dust generation, noise and lighting.

362. A detailed lighting design will be produced prior to commencement, and reviewed by an ecologist, to ensure that impacts from elevated light levels on the adjacent railway embankment and associated species such as foraging / commuting bats are minimised wherever possible. If mature trees on the embankment would experience significant elevated light levels, the trees will be assessed for bat roost potential and further surveys undertaken as necessary.
363. Trees adjacent to the site boundary would be protected during construction as set out in the Arboricultural Impact Assessment and the associated Tree Protection Plan. No trees would be removed, although the crown of one tree on the railway embankment that overhangs the site would need to be cut back to the site boundary.
364. Ecological enhancements that are being provided within the proposed development include areas of brown roof and a plant species list for landscaping to include predominantly native tree and shrub species. Brown roofs provide habitat for plant and invertebrate species that would otherwise not be present on completed development sites, and therefore contribute to maintaining biodiversity in the urban landscape.
365. The council's ecology officer has reviewed the submitted appraisal and has advised for conditions to be attached to any grant of planning permission to secure biodiverse roofs and swift bricks and bat tubes. Accordingly, these have been attached to the draft decision notice.
366. In addition, it is identified that the public open space shortfall contribution of £230,830 could be used to repave the asphalt pavement on the other side of Ilderton Road to include tree planting which would help to reduce air and noise pollution, achieve greenfield run off rates, and encourage habitat creation.

Planning obligations (S.106 undertaking or agreement)

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

Planning Obligation	Mitigation	Applicant Position
Archaeology	£11,171.00	Agreed.
Affordable housing monitoring	£11,117.40 (84 affordable homes x £132.35)	Agreed.
Carbon Offset – Green Fund	£492,660	Agreed.
Delivery and service bond	£31,700.00 The council would retain £1,600 for monitoring	Agreed.
Greenfield run off rates	£366 per cubic metre in the event that greenfield run off rates are not met on site.	Agreed.
Public open space	£230,830 £205 x shortfall (1,126sqm) Could be spent on repaving and greening the footway on the other side of Ilderton Road.	Agreed.
New Ilderton Road open space	£25,000 5 years maintenance at £5,000 a year	Agreed.
Transport for London Buses	£842,400 (£2,700 x 312 residential units)	Agreed.
Construction Management monitoring	£12,480 £40 x 312 residential units	Agreed.
Santander bikes	£15,600 £50 x 312 residential units	Agreed.
Trees	In the event that the ten trees on Ilderton Road cannot be	Agreed.

	accommodated, provision needs to be made in the s106 agreement at a unit cost of £6,000 per tree, total £60,000.	
Subtotal	£1,732,958.40	Agreed.
Admin fee	2% for all cash contributions (£34,659.17) plus flat fee of £2,000 for costs incurred in transferring TfL buses contribution totalling £36,659.17.	Agreed.
Total	£1,769,617.57	Agreed.

369. In addition to the financial contributions listed above, the applicant has engaged with the local Ilderton Primary School and agreed to fund the green living wall along the Ilderton Road boundary of the school. The green wall was installed last year, and the applicant has agreed to contribute to the cost of completing the work (£200k) which can be collected through the S106 legal agreement. Also, as listed in the table, the applicant would be making a contribution towards the maintenance of the new Ilderton Road open space for 5 years, totaling £25,000.

370. The following other provisions would be secured:

- Affordable housing provisions, including provision for an early stage review;
- Marketing, allocation and fit out of the wheelchair units;
- Appointment of workspace co-ordinator;
- Affordable workspace – Ground and ground mezzanine of Commercial unit 4, 12% of total commercial and retail floorspace (272.99sqm GIA), length of term (15 years); £12 to 15 per sqft;
- Construction phase jobs: 70 jobs, 70 short courses, 17 construction industry apprentices with a maximum contribution of £337,000.00 (£301,000.00 against sustained jobs, £10,500.00 against short courses and £25,500.00 against construction industry apprenticeships);
- Highway works – s278 works including repaving of footways;
- Car club membership for three years;
- Parking permit exemption;
- Future proofing to allow connection to a future district heating system when it becomes available in the future;
- Site management strategy;
- London Living Wage – best endeavours to being offered to all staff employed in the commercial units as well as workers during the construction period;

- Demolition and construction management plans;
- Delivery and service management plan;
- Controlled parking zone – ineligibility for residents to apply for parking permits;
- Securing of Sparrc architects deliver the building detailed design, unless otherwise agreed in writing;
- Developer to install a green school screen to Ilderton Primary School (as above);
- Social rent service charges within the rent cap;
- Equal tenure access to the children’s and communal play areas;
- Public access to central children’s play area.

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

372. In the event that a satisfactory legal agreement has not been entered into by 23 December 2020, it is recommended that the director of planning refuses planning permission, if appropriate, for the following reason:

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

Mayoral and Southwark Community Infrastructure Levy (CIL)

373. 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.

374. Based on the applicants Area Schedule (Rev.P5) dated 15-Jan-2020 and with affordable housing floor areas provided in the agent’s CIL Form dated 26-Sep-19, the gross amount of CIL is approximately £9,790,427.60 consisting £1,938,654.10 of Mayoral CIL and £7,851,773.50 of Borough CIL. If CIL relief procedures have been followed correctly after grant of planning permission, it is expected around £3,392,342.28 of Social Housing Relief might be claimed, of which £638,404.62 of MCIL relief and £2,753,937.66 of Borough CIL relief.

375. That is, the anticipated CIL receipt for this scheme is circa £6,398,085.32 net of relief. It should be noted that this is an estimate, and the floor areas will be checked when related CIL Assumption of Liability Form is submitted after planning approval has been obtained.

Other matters

376. None.

Conclusion on planning issues

377. The redevelopment of the site is supported and welcomed in principle. The principle of housing on the site is also accepted, and would be in line with policy aspirations to increase the number of new homes in the area.
378. The proposal would provide 1,817.98sqm employment floorspace on the site with the floorspace designed to appeal to a wide range of small to medium businesses and also includes two retail units which would serve a local amenity and catchment.
379. The proposed development would deliver the following regeneration benefits:
- 312 new homes to the borough's housing stock;
 - 35.61% affordable housing overall;
 - The re-provision of existing employment floorspace;
 - The provision of a 1,817.98sqm new commercial floorspace and 448.60sqm new retail floorspace;
 - 12% affordable workspace;
 - a publicly accessible children's play space; and
 - Up to 195 new full time equivalent employment positions, a significant uplift when compared to the 5 previous jobs on the site.
380. On the basis of these significant benefits, it is felt that the departure from the development plan by introducing housing into the SPIL is justified.
381. The proposal would deliver a very high standard of accommodation, which would comply with the majority of the standards and principles of exemplary residential design, as set out in Southwark's residential design standards SPD. The scheme would include a significant proportion of dual aspect units at 85.26% which is considered very good taking into account the high density of the scheme.
382. All of the communal and children's playspace requirements would be fully met on site. A s106 payment would be collected as the proposed development cannot fully accommodate the public open space requirements on site. This could go towards repaving and greening the footway on the other side of Ilderton Road with tree planting which would help to reduce air and noise pollution, help to achieve greenfield run off rates and assist in habitat creation.
383. 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.
384. The scheme does not include any car parking other than two disabled parking spaces, and provides an on site servicing bay. Cycle parking would be provided in accordance with the London Plan and car club membership for three years would be secured by the legal agreement. Financial contributions to local buses and Santander bike docking stations would be made.
385. It is therefore recommended that planning permission be granted subject to conditions, referral to the Mayor of London and the completion of a Section 106 Legal Agreement under the terms as set out above.

Statement of community involvement

386. Consultation was carried out by the applicant prior to the submission of the planning application. The consultation undertaken was carried out with the local community and key stakeholders from the area which included:
- One to one meetings and drop in sessions with key stakeholders to explain the proposals and receive feedback;
 - A two day public exhibition.
387. The main issues raised were around overlooking, the gypsy and traveller site perimeter wall, construction, building heights, road safety, noise impacts, air quality impacts and Millwall FC match days.
388. A detailed summary of the consultation carried out by the applicant can be found within the submitted Development Consultation Charter.

Consultations

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

Consultation replies

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

Summary of consultation responses

391. One objection have been received. The nature of the objection, together with an officer response can be found in the table below.

Objection	Officer response
Social housing for local people would be better suited to this site.	The proposed development includes the provision of 35.61% social rented housing, in accordance with policy.
Loss of light or overshadowing.	See main body of report for a detailed assessment in relation to the impacts of the proposed development on the daylight, sunlight and overshadowing of surrounding properties.
Overlooking/loss of privacy.	The proposed development is designed to avoid any direct overlooking to any of the habitable rooms and private gardens to all neighbouring properties. The separation distances to surrounding properties meet or exceed the minimum distances of the Residential Design Standards SPD.
Visual amenity.	The proposed development would act as a visual way finder to the most significant

	<p>transport infrastructure currently serving the area.</p> <p>The proposed development has increased pavement widths along Ilderton Road and includes a central public square that includes a children's play space and attractive landscaping providing visual connectivity to the designated nature reserve that sits alongside the elevated railway.</p>
<p>Adequacy of parking/loading/turning Highway safety Traffic generation.</p>	<p>There are a number of local amenities within a 10-minute walk of the site. Bus stops within 500 m of the site provide access to three different routes which combined provide over 20 buses per hours on a weekday. Destinations served include Surrey Quays, Canada Water, and Peckham. South Bermondsey station provides train services to London Bridge and West Croydon. There are four trains per hour to London Bridge on a weekday.</p> <p>There are three Zip Car bays within 16 minutes' walk of the site and the first residents of each of the proposed residential units would be provided with one free membership to Zipcar.</p> <p>On the basis of the above, it is considered unlikely that many future residents would wish to own their own cars. This means that the proposed development would not result in a significant increase in demand for parking on street and would not significantly increase traffic flows on Ilderton Road and other streets nearby to the site. In order to accommodate servicing trips generated by the proposed development (e.g. refuse/recycling collections, removals and deliveries) two loading bays are proposed. These will be inset into the footway such that parked goods vehicles would not affect traffic flow on Ilderton Road.</p>
<p>How would the building/development/new homes effect an already busy main road and what is proposed in regards to dealing with extra traffic/lorries/building works</p>	<p>When taking into account local transport connections, train stations, cycle routes, bus stops and car club bays it is considered unlikely that many future residents would wish to own their own cars. This means that the proposed development would not result in a</p>

	<p>significant increase in demand for parking on street and would not significantly increase traffic flows on Ilderton Road and other streets nearby to the site. In order to accommodate servicing trips generated by the proposed development (e.g. refuse/recycling collections, removals and deliveries) two loading bays are proposed. These would be inset into the footway such that parked goods vehicles would not affect traffic flow on Ilderton Road.</p>
<p>How will the development effect the light coming into the buildings opposite (45 Barkworth Road.</p>	<p>Whilst it is demonstrated that there would be relative reductions in the VSC form of assessment beyond the BRE guideline recommendations, the majority of windows would continue to retain a VSC level that is commensurate with an urban regeneration area. Furthermore, the daylight distribution levels within the rooms facing the site by reference to the NSL form of assessment would in virtually all cases satisfy the BRE guideline recommendations (i.e. no greater than 20% reduction).</p>
<p>How do you propose to support the local amenities with an extra 5000 or so people, how will it effect the train station (South Bermondsey) or the local shops.</p>	<p>The site falls within a designated Opportunity Area and Action Area and the draft OKR AAP sets the objectives and aims for the regeneration and redevelopment of the Old Kent Road area. In response to local amenities on this particular site, a retail unit is proposed at ground floor and ground mezzanine level of Core 1 and would provide a welcome active frontage along Ilderton Road.</p>
<p>Will the new development just consist of over priced homes for people not from the local area.</p>	<p>The proposed development would include 64.39% market housing alongside 35.61% policy compliant affordable housing provision.</p>
<p>What proportion of the development will be social housing?</p>	<p>35.61% affordable housing would be provided in accordance with policy which would comprise 25.47% social rented housing and 10.14% intermediate housing.</p>
<p>What will be the long term effect on parking around the area, where will lorries park to deliver goods.</p>	<p>When taking into account local transport connections, train stations, cycle routes, bus stops and car club bays it is</p>

	considered unlikely that many future residents would wish to own their own cars. This means that the proposed development would not result in a significant increase in demand for parking on street and would not significantly increase traffic flows on Ilderton Road and other streets nearby to the site. In order to accommodate servicing trips generated by the proposed development (e.g. refuse/recycling collections, removals and deliveries) two loading bays are proposed which would not affect traffic flows on Ilderton Road.
Noise and disturbance resulting from building works and uses.	Construction management plans would be requested by condition.
Loss of trees.	No trees exist on the site and no trees are proposed to be removed adjacent to the site.

392. One letter of support received on the following grounds.

Support	Officer response
The design looks interesting and will definitely improve the street scene and urban vernacular in this location. Hope that all efforts will be made to ensure the site is effectively cleared of contaminants and that due diligence is taken to protecting public health.	Noted. A contamination condition will be attached to the draft decision notice to require removal of contamination from the site.
Support the car free development. Concern is that new residents who are not blue badge holders will still require parking.	New residents would not be allowed to apply for parking permits in any future Controlled Parking Zone (CPZ).
Hope that Southwark and Lewisham Council treat this application and those coming forward in the Old Kent Road masterplan as a means to lobby TFL for improved / additional bus service, improved schedule of services at South Bermondsey and the New Bermondsey tube station.	Southwark has been actively promoting the Back the Bakerloo campaign www.backthebakerloo.org.uk and will continue to do so.
Hope that Southwark works hard to ensure that the maximum number of affordable units come forward and the applicant and its contractor do not making	35.61% affordable housing has been secured, meeting the policy requirement of 35%.

cost saving measures to the design in the post planning stage.	
Support this application, improvements needs to be made to this site and hopefully it will bring an improved provision of retail to the area, as well as encourage the architects behind the New Bermondsey proposal to improve their design.	Noted.
Hope that this development does not prejudice the long-standing community, including the travelling community in this area and that it is actually built out.	The impact of the proposed development on the traveller's site has been set out in the main body of the report. It is not felt that any harm to the traveller's site or its residents would occur.

393. Two comments received on the following grounds.

Comment	Officer response
Good density for the site, great to put an under-utilised plot of land into doing something useful.	Noted.
Currently the site makes you feel a bit vulnerable as a pedestrian, sandwiched between fencing and a road where almost everyone speeds, the extra eyes on the street from housing would really help make this stretch of street feel safer.	Noted.
The extra housing is really needed, so many couples (including myself recently) and even families are sharing rooms in shared houses/flats because there's not enough homes. The lack of homes was largely because we built too much low rise, low density houses like most of the stock around here.	The scheme will deliver a policy compliant level of affordable housing, 35.61%.
The height here is a good way of correcting that problem and providing more homes, and it's good to see a decent percentage of them are affordable tenure - could still be higher though, the council and GLA should negotiate to get that increased if possible.	The scheme will deliver a policy compliant level of affordable housing, 35.61%.
The design seems interesting, good to see different shaped brick windows rather than just the standard blocky design many new developments go for. The council	Noted.

<p>should ensure the diamond brick windows aren't value-engineered away. Good to see a large amount of good sized balconies as well. The design also is a good transition from the brick of existing housing and the glass of the New Bermondsey development, if that ends up going ahead.</p>	
<p>My only issue with this is relatively low amount of commercial space. The retail size is only around the equivalent of ten one bed flats, but this development offers the potential to extend the small stretch of shops near South Bermondsey station if done right. The area will need much more retail with the developments going in for planning, and this plot is one of the most logical ones for that to be built on (most of the others further down the road would be better for light industrial or employment focussed uses at ground floor).</p>	<p>Two retail unit (532.67sqm GEA) is proposed at ground floor and ground mezzanine level of Core 1 and will provide a welcome active frontage along Ilderton Road.</p>
<p>Overall a great proposal for the site, and one that could come forward relatively early in the wider redevelopments planned for the Old Kent Road area due to being so close to existing transit and not reliant on the overcrowded bus routes of the OKR.</p>	<p>Noted.</p>
<p>Is there any consideration for parking spaces for the additional residents and the commercial building. Additional parking demands will put enormous strains and make life unmanageable for the residents in the area including the existing church in the area.</p>	<p>When taking into account local transport connections, train stations, cycle routes, bus stops and car club bays it is considered unlikely that many future residents would wish to own their own cars. This means that the proposed development will not result in a significant increase in demand for parking on street and will not significantly increase traffic flows on Ilderton Road and other streets nearby to the site. In order to accommodate servicing trips generated by the proposed development (e.g. refuse/recycling collections, removals and deliveries) two loading bays are proposed. These would be designed such that parked goods vehicles would not affect traffic flow on Ilderton Road.</p>

Local groups

394. Bonamy Tenants Association: Support scheme but do have concerns over parking on

behalf of Bonamy TA.

395. Millwall Football Club: Supports proposals.

The strategic importance of Millwall's The Den is reflected within Lewisham's policies; it falls within the Surrey Canal Triangle - Strategic Site Allocation 3 of the Lewisham Core Strategy.

396. The allocation is for the creation of a new 'destination' development that capitalises on the opportunities presented by Millwall Stadium, and amongst other things allows for the long term future of the football club including future requirements for stadium improvement and expansion. It refers to the need to provide for the enhancement of the existing football and sports facilities, and make these accessible to the public and allow for the long term future of the Millwall Community Scheme. Part 2b of the allocation seeks to ensure that Millwall Stadium can continue to function as a mass spectator destination on a long-term basis and allow for possible expansion. This includes ensuring appropriate arrangements for access and egress, day-to-day servicing and emergency servicing and evacuation.

397. Whilst this application site is located in London Borough of Southwark, the planning policy context summarised above should be taken into account as a material consideration in the determination of this planning application. Whilst the Club is generally in support of the principle of this application and the wider regeneration of the surrounding area, it is critical to ensure that the Club can continue to thrive in this location, consistent with Lewisham's policies. We trust that consideration will be had by Officers in reviewing the application before them of the need to ensure that the needs of the Club are not compromised as a result and you will inform us if any such issues are identified in reviewing the planning application.

Statutory and non-statutory consultees

398. London Underground Infrastructure Protection: No comments.

399. Thames Water:

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

400. Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. Therefore recommend a condition be attached preventing occupation of the properties until all water upgrades have been completed.

The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains. The proposed development is located within 15m of a strategic water main. Thames Water request that a condition be attached to any grant of planning permission to require a piling method statement to be approved in writing.

401. Network Rail: Thank you for providing Network Rail with the opportunity to comment on that above application. Having considered the details of the proposal, Network Rail would

like to make the following comments: Due to the proximity of the development adjacent to NR assets and property we request the Developer contacts Network Rail at AssetProtectionkent@networkrail.co.uk to discuss the proposals and to agree an Asset Protection Agreement with us to enable any approval of the works prior to any works commencing.

402. London Underground: London Underground Infrastructure protection has no comment to make on this planning application.
403. Historic England: On the basis of the information available to date, we do not wish to offer any comments. Suggest that you seek the views of your specialist conservation advisers, as relevant.
404. Design Review Panel: An earlier version of the scheme was presented to the Design Review Panel on 13 February 2018. The Panels comments and officer response are contained in paragraphs 132-146.
405. Greater London Authority: The GLA issued their Stage 1 report on 17 February 2020. They concluded that the scheme does not currently comply with the London Plan but has set out possible remedies that could address the deficiencies. Their main points are listed below.
406. Principle: A residential-led mixed-use development is broadly supported within the Old Kent Road Opportunity Area. In order to satisfy the principle of no net loss of industrial capacity, the applicant must demonstrate that all options for the provision of industrial floorspace within the scheme have been explored, and that the space is suitably designed for B1c land uses
407. Housing: 35% affordable housing by habitable room, with a tenure split 70% Social Rent / 30% intermediate. The quantum of affordable housing is below the 50% threshold for developments on industrial land where industrial capacity is not re-provided, therefore the scheme is ineligible for fast track consideration. Early and late stage viability review mechanisms must be secured. A revised financial viability appraisal is required to address the detailed comments provided under separate cover.
408. Urban Design: The broad layout, heights and massing arrangement are supported. However further work is required deliver a safe and welcoming pedestrian environment, including amendments to the servicing arrangements. The design of commercial units must achieve specifications for B1c light industrial use. Playspace design and location should be reconsidered to account for safety and security conflicts with B1c land uses. The applicant must provide verified views which demonstrate the proposal would not harm the composition of Protected Vista 2A.1, as required by London Plan Policy 7.12 C and Policy.
409. Sustainable Development: Further revisions and information are required before the energy proposals can be accepted and the carbon dioxide savings verified to comply with Policy 5.2 of the London Plan and Policy SI2 of the intend to publish London Plan. Contribution to the borough's offset fund must be secured in a s106. An amended drainage strategy and water consumption information are required to satisfy Policies 5.12, 5.13 and 5.15 of the London Plan and SI12, SI13 and SI5 of the intend to publish London Plan
410. Transport: The scheme must be amended to achieve healthy streets objectives and London Cycle Design Standards. Blue badge parking must be provided in accordance with

Policy T6 of the Intend to publish London Plan. Financial contributions for public realm improvements, wayfinding initiatives, a cycle hire docking station, and improvements to the surrounding bus network (£2,700/unit) must be secured in a s106 agreement. A CPZ must be adopted. A revised Delivery, Servicing and Management Plan, Travel Plan and Logistics Plan must be provided and secured by condition.

411. GLA subsequent comments dated 03/03/3030: Whilst it is accepted that there is agreement this site may be released from SIL in future, it is still currently designated as Strategic Industrial Land and remains so until such time as the new Southwark Plan is formally adopted. It is noted that the Mayor's response on the New Southwark Plan incorrectly identified that this site must be re-designated as LSIS, however it is understood that the GLA has now agreed with LBS's officers that this site can be released from any industrial designation. As the New Southwark Plan is yet to be adopted the site must be treated as SIL in the first instance and therefore our position in the Stage 1 report is consistent with other schemes on designated SIL in OKR, which are on identified for phase 1 release.
412. The GLA would agree that, if/when the designation is formally lifted (in line with current proposals), the 65% plot ratio test would fall away and be replaced by the lighter test for non-designated industrial sites contained in policy E7 (Part C) of the intend to publish London Plan. Noting the constraints of the site, including limitations on servicing and unit depth, it is acknowledged that the site may not be appropriate for industrial co-location. Given Southwark's status as a 'retain' Borough, LBS must be satisfied that any industrial capacity lost on this site would be retained elsewhere either within the Old Kent Road Opportunity Area (in the first instance) or elsewhere in the borough.
413. Officer response: The site would not fall within the proposed future protected SPIL or LSIS designation and so it is felt that the request to apply the 65% plot ratio test and require B1c provision need not apply. This has been acknowledged by the GLA in their subsequent comments.
414. The existing site is an open concrete space which has never been used for industrial purposes. It was previously occupied by RS Joyner and Son on the open concrete space to hold redundant trucks which were then sold online. Its lawful use is considered to be Sui Generis not Class B8.
415. Neighbouring sites of greater depth and more suited in character to industrial use have been clearly allocated in the draft OKR AAP as suitable for depots and industrial units. 79-161 Ilderton Road is marked within the draft OKR AAP for residential use.
416. It is a long and linear shaped site, close to South Bermondsey and the new Bermondsey station which would be well placed to provide general B1 provision, and accordingly the servicing arrangements currently shown on the plans would be appropriate to meet the service needs.
417. In addition, the site is not designated as falling within the designated Locally Significant Industrial area or as Strategic Protected Industrial Land within the draft OKR AAP or on the plan set out on the latest version of the New Southwark Plan, page 356 of the NSPSV January 2020.
418. This scheme is not considered to detract from either the strategic or local plan making process, and reflects the adopted statutory development plan position of the London plan and the direction of travel of the draft New Southwark Plan and the Area Action Plan and the New London Plan

419. The previous use employed just 5 people. The proposed office, retail and residential uses would employ between 190-195 people.
420. It is clear from the applicant's assessment that the proposed development would not have any significant effect on the setting of St Paul's Cathedral. It is visually separated from St Paul's by a considerable lateral distance in the view, and would sit low in the overall townscape. It would be barely discernible from this viewing location. The form and materials of the proposed development would preserve the clarity with which the silhouette of the St Paul's Cathedral can be distinguished from its background. It is felt that there would be no harm whatsoever to the view of St Paul's Cathedral
421. On the bus contribution, £2,700 per residential unit has now been agreed.
422. Within the submitted Transport Assessment, it was estimated that the proposed development would generate an additional 24 two-way rail trips in the AM peak period and an additional 22 two-way rail trips in the PM peak period.
423. When these trips are split across the six trains per hour at South Bermondsey station, this equates to approximately four additional people per service in the peak periods. It is concluded that these trips, once split across each service, would not have a material impact. Given the level of impact on each service, it is not considered necessary to provide a financial contribution to South Bermondsey

Transport for London

Walking and the Public Realm

424. The development has been set back from Ilderton Road in order to provide parking and loading bays. The profile of the front of the proposed buildings and the depth of the parking and loading bays leads to a footway which meanders considerably. The width of the footway appears to be as little as two metres wide in places which, when taking account of the necessary street furniture, is potentially too narrow for the pedestrian traffic likely to use it, and could be considered a poor setting for a tall building.
425. Funding for Legible London wayfinding should also be secured and, in line with current discussions on funding, £10,050 is requested based on a contribution of £30 per residential unit. This and all further contributions listed below (aside from bus service contributions) could potentially be funded from Southwark's own Community Infrastructure Levy, subject to a funding agreement
426. An existing bus stop is situated roughly in front of the proposed central play area. Opportunity should be taken to integrate the shelter and seating better into the development at this point.

Cycling

427. The long-stay and much of the short-stay cycle parking is provided in the basement on two-tier racks. These are not suitable for children's or any non-standard type of bike, and require a good level of physical strength and dexterity for use
428. Access to the cycle parking places is poor, with aisle width less than the minimum recommended for two-tier racks and in places requiring a number of turns and negotiation

of multiple doors. This difficult access is not acceptable yet could be improved considerably through very simple layout changes.

429. No audit of cycling infrastructure is provided in support of the application. It is recommended that such an audit, and funding toward any deficiencies highlighted, is secured by the council.
430. It is an aspiration of TfL, and until recently the council, that TfL's cycle hire scheme is extended to this area. Consequently the provision of a suitable location on the frontage and funding of £67,000 towards a cycle hire docking station should be sought.

Car parking

431. The proposal for a car-free development is welcomed, but this will only be effective with the introduction of a controlled parking zone to which new residents will be made ineligible. It is therefore essential that the council secures funding for this.
432. The provision of two accessible parking spaces for disabled users is substantially below the level of parking required by the London Plan. When an acceptable level of car parking for people with disabilities is proposed, an appropriate level of electric vehicle charging points should be proposed.
433. Public and active transport: A current estimate of the future requirements leads to a rate of £3,290 per residential unit. Funding for Healthy Streets at £4210 per residential unit should also be secured.
434. Local road bus priority improvements are also sought at a rate of £260 per unit, a contribution toward bus operational infrastructure in the area of £105 per unit, and a contribution toward minor station improvements of £18 per unit, together totalling £128,305.

Servicing

435. The servicing trips predict one trip per household every fortnight, which appears to be unreasonably low. Refuse collection arrangements involve waste bins to be stored temporarily at ground floor level. There appears to be no space to do this other than by blocking the footway, which is unacceptable.

Officer response:

436. The existing footway is between 1.72 to 1.92m wide. The proposed footway would be widened to a minimum of 2.4m (around loading bay), to 9.2m.

A Draft Delivery and Servicing Management Plan (DSMP) was submitted as part of the planning application. The covers the arrangements for deliveries and refuse collection. It says that people (i.e. retail staff, workers and residents) will be advised to avoid scheduling deliveries between 07:00-10:00 and 16:00-19:00 where possible

437. A PERS (Pedestrian Environment Review System) audit was undertaken and concluded that the pedestrian environment along the routes assessed are of good quality with wide footways, segregated from vehicular traffic with street lighting. Dropped kerbs and tactile paving to assist those with reduced mobility are also present at most appropriate locations such as crossing points.

438. The speed limit on Ilderton Road, between Rotherhithe New Road and Zampa Road is 20 mph. There are advance cycle stops lines at both ends of the identified section of Ilderton Road. Parking on both sides is restricted between 08:00 and 18:30 Monday- Saturday. Given the above, it is considered that Ilderton Road is a suitable route for cyclists in its current form.
439. The cycle parking provision within the proposed development is in excess of the minimum levels required by the adopted London Plan and meets the levels required by the draft New London Plan. The cycle stands have been arranged in accordance with manufacturer specifications to ensure they are all accessible. There are dedicated lifts from ground to basement level providing access to the majority of the cycle parking. 5% of the cycle parking spaces allocated for the residential units will be capable of accommodating larger cycles.
440. In addition, nine Brompton bicycle lockers located at basement level will allow residents and visitors to hire bikes from site. On this basis it is not considered necessary to safeguard any land within the development for the use of a docking station or for the developers to contribute towards the cost of a docking station
441. £2,700 per residential unit has been secured towards bus improvements in advance of the BLE and £50 per residential unit has been secured towards Santandar docked bikes.
442. Environment Agency: Object to the planned development. The proposed development may be flooded and expose occupants to flood waters during a breach of the Thames Tidal Flood Defences taking into account the effect of climate change. The applicant can overcome our objection by submitting a proposal which locates the FFLs 300mm above the Maximum Likely Water Level, in line with the London Borough of Southwark's Flood Risk Assessment.
443. Officer response: Further dialogue with the Environment Agency has removed this objection. See Environment Agency response to the re-consultation below.
444. An undertaking should be given that access for fire appliances as required by Part B5 of the current Building Regulations Approved Document and adequate water supplies for fire fighting purposes, will be provided. This is without prejudice to any requirements or recommendations that may be made by the Authority under the Regulatory Reform (Fire Safety) Order 2005/Petroleum (Consolidation) Act 1928, the local authority or the Health and Safety Executive.

Network Rail:

445. Due to the proximity of the development adjacent to Network Rail assets and property we request the Developer contacts Network Rail at AssetProtectionkent@networkrail.co.uk to discuss the proposals and to agree an Asset Protection Agreement with us to enable any approval of the works prior to any works commencing
446. Natural England: No comments.

Re-consultation

447. Designing out crime advisor:

Fully believe that this development is suitable to achieve Secured By Design accreditation, and in order to assist the development with achieving Secured By Design standards, recommend planning conditions stating:

1. Before any above grade work hereby authorised begins, details of security measures shall be submitted and approved in writing by the Local Planning Authority and any such security measures shall be implemented prior to occupation in accordance with the approved details which shall achieve the 'Secured by Design' accreditation award from the Metropolitan Police.

2. Prior to the first occupation of the units hereby consented, confirmation that Secure by Design certification for that building has been achieved shall be submitted to and approved in writing by the Local Planning Authority.

448. London Underground: London Underground Infrastructure protection has no comment to make on this planning application.

449. Environment Agency: No objection subject to imposition of the flood risk condition.

450. Natural England: No objection.

Community impact statement / Equalities Assessment

451. 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.

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

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

454. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application. In particular there was a concern that a nearby church with a primarily BME congregation might be adversely effected by having new high density residential in close proximity. As referenced in the main body of the report given the layout and orientation of the flats and the levels of insulation it is not considered that this development as an “agent of change” would result in the future operation of the church being compromised as a result of noise complaints form new neighbours. There is a traveller’s site to the north of the scheme, but it is not considered that any of the special characteristics of that community would be adversely affected by this development.

Human rights implications

455. 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.

456. This application has the legitimate aim of providing a redevelopment of the site to provide new homes with retail and commercial floorspace. 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.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

457. None.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/2327-79 Application file: 18/AP/2497 Southwark Local Development Framework and Development Plan Documents	Chief Executive's 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 5604 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	Kiran Chauhan, Team Leader Old Kent Road Team	
Version	Final	
Dated	12 March 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		13 March 2020

Consultation undertaken

Site notice date: 03/09/2018

Press notice date: 06/09/2018

Case officer site visit date: 03/09/2018 & 29/01/2020

Neighbour consultation letters sent: 03/09/2018

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
Parks & Open Spaces
Public Health Team
Waste Management

Statutory and non-statutory organisations consulted:

Civil Aviation Authority
EDF Energy
Environment Agency
Greater London Authority
Historic England
London Borough of Lewisham
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 5 16 Barkworth Road SE16 3BZ	3 Bramcote Grove London SE16 3BN
Flat 6 16 Barkworth Road SE16 3BZ	31 Bramcote Grove London SE16 3BN
Flat 3 16 Barkworth Road SE16 3BZ	27 Bramcote Grove London SE16 3BN
Flat 4 16 Barkworth Road SE16 3BZ	29 Bramcote Grove London SE16 3BN
25 Barkworth Road London SE16 3BZ	5 Ablett Street London SE16 3BL
31 Barkworth Road London SE16 3BZ	7 Ablett Street London SE16 3BL
33 Barkworth Road London SE16 3BZ	35 Ablett Street London SE16 3BL
27 Barkworth Road London SE16 3BZ	37 Ablett Street London SE16 3BL
29 Barkworth Road London SE16 3BZ	9 Ablett Street London SE16 3BL

42 Barkworth Road London SE16 3BZ
44 Barkworth Road London SE16 3BZ
38 Barkworth Road London SE16 3BZ
40 Barkworth Road London SE16 3BZ
46 Barkworth Road London SE16 3BZ
Flat 1 16 Barkworth Road SE16 3BZ
Flat 2 16 Barkworth Road SE16 3BZ
48 Barkworth Road London SE16 3BZ
50 Barkworth Road London SE16 3BZ
Flat 7 52 Barkworth Road SE16 3BZ
Flat 8 52 Barkworth Road SE16 3BZ
Flat 5 52 Barkworth Road SE16 3BZ
Flat 6 52 Barkworth Road SE16 3BZ
Flat 1 54 Barkworth Road SE16 3BZ
Flat 4 54 Barkworth Road SE16 3BZ
Flat 5 54 Barkworth Road SE16 3BZ
Flat 2 54 Barkworth Road SE16 3BZ
Flat 3 54 Barkworth Road SE16 3BZ
39 Barkworth Road London SE16 3BZ
41 Barkworth Road London SE16 3BZ
35 Barkworth Road London SE16 3BZ
37 Barkworth Road London SE16 3BZ
43 Barkworth Road London SE16 3BZ
Flat 3 52 Barkworth Road SE16 3BZ
Flat 4 52 Barkworth Road SE16 3BZ
Flat 1 52 Barkworth Road SE16 3BZ
Flat 2 52 Barkworth Road SE16 3BZ
Flat 2 55 Varcoe Road SE16 3DE

Flat 3 55 Varcoe Road SE16 3DE
53 Varcoe Road London SE16 3DE
Flat 1 55 Varcoe Road SE16 3DE
Flat 4 55 Varcoe Road SE16 3DE
57 Varcoe Road London SE16 3DE
61 Varcoe Road London SE16 3DE
Flat 5 55 Varcoe Road SE16 3DE
Flat 6 55 Varcoe Road SE16 3DE
39 Varcoe Road London SE16 3DE
41 Varcoe Road London SE16 3DE
35 Varcoe Road London SE16 3DE
37 Varcoe Road London SE16 3DE
43 Varcoe Road London SE16 3DE
49 Varcoe Road London SE16 3DE
51 Varcoe Road London SE16 3DE
45 Varcoe Road London SE16 3DE
47 Varcoe Road London SE16 3DE
24 Barkworth Road London SE16 3BZ
26 Barkworth Road London SE16 3BZ
20 Barkworth Road London SE16 3BZ
22 Barkworth Road London SE16 3BZ
28 Barkworth Road London SE16 3BZ
34 Barkworth Road London SE16 3BZ
36 Barkworth Road London SE16 3BZ
30 Barkworth Road London SE16 3BZ
32 Barkworth Road London SE16 3BZ

13 Bramcote Grove London SE16 3BN
15 Bramcote Grove London SE16 3BN
1 Bramcote Grove London SE16 3BN
11 Bramcote Grove London SE16 3BN
25 Delaford Road London SE16 3BQ
27 Delaford Road London SE16 3BQ
21 Delaford Road London SE16 3BQ
23 Delaford Road London SE16 3BQ
29 Delaford Road London SE16 3BQ
33 Delaford Road London SE16 3BQ
35 Delaford Road London SE16 3BQ
3 Delaford Road London SE16 3BQ
31 Delaford Road London SE16 3BQ
9 Bramcote Grove London SE16 3BN
1 Delaford Road London SE16 3BQ
5 Bramcote Grove London SE16 3BN
7 Bramcote Grove London SE16 3BN
11 Delaford Road London SE16 3BQ
17 Delaford Road London SE16 3BQ
19 Delaford Road London SE16 3BQ
13 Delaford Road London SE16 3BQ
15 Delaford Road London SE16 3BQ
Flat 8 141 Verney Road SE16 3JY
Flat 9 141 Verney Road SE16 3JY
Flat 5 141 Verney Road SE16 3JY
Flat 7 141 Verney Road SE16 3JY
Flat 6 141 Verney Road SE16 3JY
South Bermondsey Railway Station
Rotherhithe New Road SE16 3JB
Flat 1 77 Ilderton Road SE16 3JU
179a Ilderton Road London SE16 3LA
Flat 11 141 Verney Road SE16 3JY
Flat 12 141 Verney Road SE16 3JY
Flat 1 141 Verney Road SE16 3JY
Flat 10 141 Verney Road SE16 3JY
Flat 13 141 Verney Road SE16 3JY
Flat 3 141 Verney Road SE16 3JY
Flat 4 141 Verney Road SE16 3JY
Flat 14 141 Verney Road SE16 3JY
Flat 2 141 Verney Road SE16 3JY
23 Ablett Street London SE16 3BL
25 Ablett Street London SE16 3BL
19 Ablett Street London SE16 3BL
21 Ablett Street London SE16 3BL
27 Ablett Street London SE16 3BL
31 Ablett Street London SE16 3BL
33 Ablett Street London SE16 3BL
29 Ablett Street London SE16 3BL
3 Ablett Street London SE16 3BL
Flat 4 77 Ilderton Road SE16 3JU
Flat 5 77 Ilderton Road SE16 3JU
Flat 2 77 Ilderton Road SE16 3JU
Flat 3 77 Ilderton Road SE16 3JU
1 Ablett Street London SE16 3BL
15 Ablett Street London SE16 3BL

Flat 3 59 Varcoe Road SE16 3DE
 Flat 4 59 Varcoe Road SE16 3DE
 Flat 1 59 Varcoe Road SE16 3DE
 Flat 2 59 Varcoe Road SE16 3DE
 Flat 1 35 Bramcote Grove SE16 3BN
 37 Bramcote Grove London SE16 3BN
 18 Barkworth Road London SE16 3BZ
 Flat 2 35 Bramcote Grove SE16 3BN
 33 Bramcote Grove London SE16 3BN
 94 Verney Road London SE16 3DB
 96 Verney Road London SE16 3DB
 90 Verney Road London SE16 3DB
 92 Verney Road London SE16 3DB
 98 Verney Road London SE16 3DB

 104 Verney Road London SE16 3DB
 106 Verney Road London SE16 3DB
 100 Verney Road London SE16 3DB
 102 Verney Road London SE16 3DB
 Flat 3 114 Verney Road SE16 3DB

 Flat 4 114 Verney Road SE16 3DB
 Flat 1 114 Verney Road SE16 3DB
 Flat 2 114 Verney Road SE16 3DB
 Flat 5 114 Verney Road SE16 3DB
 86 Verney Road London SE16 3DB
 88 Verney Road London SE16 3DB
 Flat 6 114 Verney Road SE16 3DB
 84 Verney Road London SE16 3DB
 112 Verney Road London SE16 3DB
 8 Splendour Walk London SE16 3BT
 108 Verney Road London SE16 3DB
 110 Verney Road London SE16 3DB
 9 Splendour Walk London SE16 3BT
 39 Jarrow Road London SE16 3JR
 Railway Arches J To M Bolina Road SE16 3LD
 79-161 Ilderton Road London SE16 3JZ
 Flat 1 45 Barkworth Road SE16 3BZ
 Flat 2 45 Barkworth Road SE16 3BZ
 Flat 7 56 Barkworth Road SE16 3BZ
 Flat 8 56 Barkworth Road SE16 3BZ
 Flat 3 45 Barkworth Road SE16 3BZ
 Flat 6 45 Barkworth Road SE16 3BZ
 Flat 7 45 Barkworth Road SE16 3BZ
 Flat 4 45 Barkworth Road SE16 3BZ
 Flat 5 45 Barkworth Road SE16 3BZ
 Flat 8 54 Barkworth Road SE16 3BZ
 Flat 1 56 Barkworth Road SE16 3BZ
 Flat 6 54 Barkworth Road SE16 3BZ
 Flat 7 54 Barkworth Road SE16 3BZ
 Flat 2 56 Barkworth Road SE16 3BZ
 Flat 5 56 Barkworth Road SE16 3BZ
 Flat 6 56 Barkworth Road SE16 3BZ
 Flat 3 56 Barkworth Road SE16 3BZ
 Flat 4 56 Barkworth Road SE16 3BZ

 17 Ablett Street London SE16 3BL
 11 Ablett Street London SE16 3BL
 13 Ablett Street London SE16 3BL
 10 Ablett Street London SE16 3BP
 12 Ablett Street London SE16 3BP
 6 Ablett Street London SE16 3BP
 8 Ablett Street London SE16 3BP
 14 Ablett Street London SE16 3BP
 20 Ablett Street London SE16 3BP
 22 Ablett Street London SE16 3BP
 16 Ablett Street London SE16 3BP
 18 Ablett Street London SE16 3BP
 1a Zampa Road London SE16 3LH
 Christ Apostolic Church 163 Ilderton Road
 SE16 3LA
 49 Ilderton Road London SE16 3JU
 119 Verney Road London SE16 3DA
 2 Ablett Street London SE16 3BP
 4 Ablett Street London SE16 3BP
 Ilderton Primary School Ilderton Road SE16
 3LA
 77 Ilderton Road London SE16 3JU
 6 Splendour Walk London SE16 3BT
 7 Splendour Walk London SE16 3BT
 4 Splendour Walk London SE16 3BT
 5 Splendour Walk London SE16 3BT
 25 Varcoe Road London SE16 3DE
 31 Varcoe Road London SE16 3DE
 33 Varcoe Road London SE16 3DE
 27 Varcoe Road London SE16 3DE
 29 Varcoe Road London SE16 3DE
 28 Ablett Street London SE16 3BP
 30 Ablett Street London SE16 3BP
 24 Ablett Street London SE16 3BP
 26 Ablett Street London SE16 3BP
 32 Ablett Street London SE16 3BP
 2 Splendour Walk London SE16 3BT
 3 Splendour Walk London SE16 3BT
 34 Ablett Street London SE16 3BP
 1 Splendour Walk London SE16 3BT
 20 Delaford Road London SE16 3BS
 22 Delaford Road London SE16 3BS
 16 Delaford Road London SE16 3BS
 18 Delaford Road London SE16 3BS
 24 Delaford Road London SE16 3BS
 30 Delaford Road London SE16 3BS
 32 Delaford Road London SE16 3BS
 26 Delaford Road London SE16 3BS
 28 Delaford Road London SE16 3BS
 41 Delaford Road London SE16 3BQ
 43 Delaford Road London SE16 3BQ
 37 Delaford Road London SE16 3BQ
 39 Delaford Road London SE16 3BQ
 5 Delaford Road London SE16 3BQ
 12 Delaford Road London SE16 3BS

125 Verney Road London SE16 3DA
127 Verney Road London SE16 3DA
121 Verney Road London SE16 3DA
123 Verney Road London SE16 3DA
129 Verney Road London SE16 3DA
135 Verney Road London SE16 3DA
137 Verney Road London SE16 3DA
131 Verney Road London SE16 3DA
133 Verney Road London SE16 3DA
Flat 2 47 Barkworth Road SE16 3BZ
Flat 3 47 Barkworth Road SE16 3BZ
Flat 8 45 Barkworth Road SE16 3BZ
Flat 1 47 Barkworth Road SE16 3BZ
Flat 4 47 Barkworth Road SE16 3BZ
Flat 7 47 Barkworth Road SE16 3BZ
Flat 8 47 Barkworth Road SE16 3BZ
Flat 5 47 Barkworth Road SE16 3BZ
Flat 6 47 Barkworth Road SE16 3BZ
21 Bramcote Grove London SE16 3BN
23 Bramcote Grove London SE16 3BN
17 Bramcote Grove London SE16 3BN
19 Bramcote Grove London SE16 3BN

25 Bramcote Grove London SE16 3BN

Lewisham Properties

STEEL OPTIONS LTD UNIT 11 ORION
BUSINESS CENTRE SURREY CANAL ROAD
LONDON SE14 5RT
R T S WASTE MANAGEMENT LTD UNIT 1
STOCKHOLM ROAD LONDON SE16 3LP
UNIT 20 ORION BUSINESS CENTRE
SURREY CANAL ROAD LONDON SE14 5RT
MILLWALL FOOTBALL CLUB THE NEW DEN
ZAMPA ROAD LONDON SE16 3LN
UNIT 40 ENTERPRISE INDUSTRIAL ESTATE
BOLINA ROAD LONDON SE16 3LF
FIGARO IMPORTS LTD UNIT 11
ENTERPRISE INDUSTRIAL ESTATE BOLINA
ROAD LONDON SE16 3LF
UNIT 4A ENTERPRISE INDUSTRIAL ESTATE
BOLINA ROAD LONDON SE16 3LF
VOLKSTECH MOTOR SERVICES UNIT 7
ENTERPRISE INDUSTRIAL ESTATE BOLINA
ROAD LONDON SE16 3LF
UNIT 15-16 ENTERPRISE INDUSTRIAL
ESTATE BOLINA ROAD LONDON SE16 3LF
HOUSE OF PROSPERITY UNIT 42
ENTERPRISE INDUSTRIAL ESTATE BOLINA
ROAD LONDON SE16 3LF
LEES MOTORS UNIT 8 ENTERPRISE
INDUSTRIAL ESTATE BOLINA ROAD
LONDON SE16 3LF
UNIT 13 ENTERPRISE INDUSTRIAL ESTATE

14 Delaford Road London SE16 3BS
7 Delaford Road London SE16 3BQ
9 Delaford Road London SE16 3BQ
35 Ilderton Road London SE16 3JU
37 Ilderton Road London SE16 3JU
31 Ilderton Road London SE16 3JU
33 Ilderton Road London SE16 3JU
39 Ilderton Road London SE16 3JU
45 Ilderton Road London SE16 3JU
47 Ilderton Road London SE16 3JU
41 Ilderton Road London SE16 3JU
43 Ilderton Road London SE16 3JU
38 Delaford Road London SE16 3BS
90 Varcoe Road London SE16 3DG
34 Delaford Road London SE16 3BS
36 Delaford Road London SE16 3BS
21 Ilderton Road London SE16 3JU
27 Ilderton Road London SE16 3JU
29 Ilderton Road London SE16 3JU
23 Ilderton Road London SE16 3JU
25 Ilderton Road London SE16 3JU
Flat 26 Leybourne House 19 Lovelinch
Close SE15 1HL
3, Otford House Sharratt Street SE15 1PG
The Den, Zampa Road South Bermondsey
SE16 3LN

MILLWALL MOTORS UNIT 31-32
ENTERPRISE INDUSTRIAL ESTATE
BOLINA ROAD LONDON SE16 3LF
UNIT 13 ORION BUSINESS CENTRE
SURREY CANAL ROAD LONDON SE14
5RT
ATAR HOUSE 179 ILBERTON ROAD
LONDON SE16 3LA 14/09/2018
FUSION TABLE TENNIS CLUB UNIT 2
STOCKHOLM ROAD LONDON SE16 3LP
SYLVANUS WOODCRAFT LTD UNIT 35
ENTERPRISE INDUSTRIAL ESTATE
BOLINA ROAD LONDON SE16 3LF
C P AUTOS UNIT 21 ENTERPRISE
INDUSTRIAL ESTATE BOLINA ROAD
LONDON SE16 3LF
MAY WASTE UNIT 30A ENTERPRISE
INDUSTRIAL ESTATE BOLINA ROAD
LONDON SE16 3LF
UNIT 4 ORION BUSINESS CENTRE
SURREY CANAL ROAD LONDON SE14
5RT
UNIT 14 ORION BUSINESS CENTRE
SURREY CANAL ROAD LONDON SE14
5RT
UNIT 38 ENTERPRISE INDUSTRIAL
ESTATE BOLINA ROAD LONDON SE16
3LF

BOLINA ROAD LONDON SE16 3LF
 CHIEF AUTOS 1A ZAMPA ROAD LONDON SE16 3LH
 MILLENNIUM BATHROOMS UNIT 12 ORION
 BUSINESS CENTRE SURREY CANAL ROAD LONDON SE14 5RT
 LONDON DRINKS LTD UNIT 5 ENTERPRISE INDUSTRIAL ESTATE BOLINA ROAD LONDON SE16 3LF
 UNIT 37 ENTERPRISE INDUSTRIAL ESTATE BOLINA ROAD LONDON SE16 3LF
 ROSE GLIDE LTD UNIT 17 ORION
 BUSINESS CENTRE SURREY CANAL ROAD LONDON SE14 5RT
 LONDON THUNDER BASKETBALL UNIT 2B STOCKHOLM ROAD LONDON SE16 3LP
 ZAMPA FISH UNIT 28 ENTERPRISE INDUSTRIAL ESTATE BOLINA ROAD LONDON SE16 3LF
 UNIT 41 ENTERPRISE INDUSTRIAL ESTATE BOLINA ROAD LONDON SE16 3LF
 UK LED SIGNS LTD UNIT 24 ORION
 BUSINESS CENTRE SURREY CANAL ROAD LONDON SE14 5RT
 WEBUYYOURMETAL LTD UNIT 33
 ENTERPRISE INDUSTRIAL ESTATE BOLINA ROAD LONDON SE16 3LF
 UNIT 19 ENTERPRISE INDUSTRIAL ESTATE BOLINA ROAD LONDON SE16 3LF
 FISH DIRECT LTD UNIT 1 ENTERPRISE INDUSTRIAL ESTATE BOLINA ROAD LONDON SE16 3LF
 O'NEILL MOTORS UNIT 14 ENTERPRISE INDUSTRIAL ESTATE BOLINA ROAD LONDON SE16 3LF
 UNIT 9 ENTERPRISE INDUSTRIAL ESTATE BOLINA ROAD LONDON SE16 3LF
 UNIT 21 ORION BUSINESS CENTRE SURREY CANAL ROAD LONDON SE14 5RT
 UNIT 22 ORION BUSINESS CENTRE SURREY CANAL ROAD LONDON SE14 5RT
 V & D MOTORS UNIT 4 ENTERPRISE INDUSTRIAL ESTATE BOLINA ROAD LONDON SE16 3LF
 HONG WANS FOOD SUPPLY LTD UNIT 39 ENTERPRISE INDUSTRIAL ESTATE BOLINA ROAD LONDON SE16 3LF
 RAVENSBORNE WINE UNIT 1 ORION
 BUSINESS CENTRE SURREY CANAL ROAD LONDON SE14 5RT
 L T CLASSICS UNIT 12 ENTERPRISE INDUSTRIAL ESTATE BOLINA ROAD LONDON SE16 3LF

LEWISHAM LIONS CENTRE BOLINA ROAD LONDON SE16 3LD
 CHRIST APOSTOLIC CHURCH 163 ILBERTON ROAD LONDON SE16 3LA
 LONDON ICE LTD UNIT 34 ENTERPRISE INDUSTRIAL ESTATE BOLINA ROAD LONDON SE16 3LF
 G P S TESTING UNIT 23 ENTERPRISE INDUSTRIAL ESTATE BOLINA ROAD LONDON SE16 3LF
 M H COACHWORKS UNIT 24-26 ENTERPRISE INDUSTRIAL ESTATE BOLINA ROAD LONDON SE16 3LF
 UNIT 27 ENTERPRISE INDUSTRIAL ESTATE BOLINA ROAD LONDON SE16 3LF
 WHITE VILLA LTD UNIT 23 ORION
 BUSINESS CENTRE SURREY CANAL ROAD LONDON SE14 5RT
 UNIT 30 ENTERPRISE INDUSTRIAL ESTATE BOLINA ROAD LONDON SE16 3LF
 EMBLEM DIRECT LTD UNIT 29 ENTERPRISE INDUSTRIAL ESTATE BOLINA ROAD LONDON SE16 3LF
 LIONS TEST (M O T) CENTRE UNIT 6 ENTERPRISE INDUSTRIAL ESTATE BOLINA ROAD LONDON SE16 3LF

Re-consultation: 21.01.2020

Consultation responses received

Internal services

Public Health Team

Statutory and non-statutory organisations

Historic England

London Underground Limited

Natural England - London Region & South East Region

Network Rail (Planning)

Thames Water - Development Planning

Neighbours and local groups

Christ Apostolic Church 163 Ilderton Road SE16 3LA

Flat 26 Leybourne House 19 Lovelinch Close SE15 1HL

Flat 8 45 Barkworth Road SE16 3BZ

The Den, Zampa Road South Bermondsey SE16 3LN

3, Otford House Sharratt Street SE15 1PG

30 Ablett Street London SE16 3BP