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Item No. 6.2	Classification: Open	Date: 21 November 2020	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 20/AP/0269 for: FULL PLANNING PERMISSION Address: GARAGES ADJACENT TO TREVITHICK HOUSE, RENNIE ESTATE, GALLEYWALL ROAD LONDON SOUTHWARK Proposal: Construction of a twelve storey and a five storey affordable residential development of 49 new units (class C3), with associated parking, cycle parking, refuse stores, amenity and new landscaping to Rennie Estate.		
Ward(s) or groups affected:	South Bermondsey		
From:	Director of Planning		
Application Start Date	29/01/2020	Application Expiry Date	29/04/2020
Earliest Decision Date	02/03/2020		

RECOMMENDATIONS

1. That planning permission be granted subject to conditions, to unilateral undertaking and referral to the GLA for a Stage 2 report.
2. That if a unilateral undertaking is not completed by 31 March 2021, the director of planning be authorised to refuse planning permission, if appropriate, for the reason detailed in paragraph 98 of this report.

BACKGROUND INFORMATION

Site location and description

3. The site is located within the Rennie Estate, a Council owned estate located along the North Eastern side of Galleywall Road. The primary development site (though landscaping works are proposed across the estate) is to the South of Trevithick House and is host to 10 car parking spaces. The site was formerly occupied by a series of garages which have been demolished.

4. Aerial view of existing site



5. The site is located within:

- Urban Density Zone
- Old Kent Road Opportunity Area
- Bermondsey Lake Archaeological Priority Zone
- Air Quality Management Area

6. The post-war architecture of the site varies in scale, height, and massing, with two taller tower blocks giving way to shorter, longer blocks towards the Southern end of the estate. The existing blocks vary in height between 14 and 5 storeys in height. The estate also contains a substantial amount of green space, including play areas, and a number of trees.

7. The site has a Public Transport Accessibility Level of 3.

The surrounding area

8. The surrounding area contains a diverse range of uses, typical of a central London location. The site is flanked to the North-West and South-East by industrial/commercial estates; the South-West by Galleywall Primary school, and; to the North-East by an active railway line. The wider surrounding area is largely defined by residential properties of low to medium density.

Details of proposal

9. The proposal is for the construction of a pair of residential blocks on the existing garage site to the South of Trevithick House. The blocks would be 12 storeys (henceforth Block A) and 5 (Block B) storeys in height.
10. The blocks would contain 49 new residential units (40 in Block A and 9 in Block B), all of which would be council homes. Four wheelchair accessible units would be provided within Block A. The housing mix of these units would be as follows:

Unit type	Total	Percentage of total
1b2p	20	41%
2b3p	7	14%
2b4p	10	20%
3p5p	2	4%
3b6p	8	16%
4b6p	2	4%
All units	49	100%

11. Block A would contain:
 - 68 cycle parking spaces
 - 3 x 1100L communal recycling waste bins
 - 5 x 1100L communal residual waste recycling bins
12. Block B would contain:
 - 16 cycle parking spaces
 - 1 x 1100L communal recycling waste bins
 - 2 x 1100L communal residual waste recycling bins
13. Two ground floor units would have dedicated cycle parking for two cycles each; separate storage for four visitor cycle parking spaces is also proposed. This brings the total number of cycle parking spaces to 92.
14. In the immediate area around the car park site, communal amenity space and children's play space for 0-4 year olds would be provided, with further landscaping enhancements to be provided around the Rennie Estate. Three parking spaces for blue badge holders are also proposed.

Planning history

15. See Appendix 1 for any relevant planning history of the application site.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

16. The main issues to be considered in respect of this application are:
- Principle of the proposed development in terms of land use;
 - Environmental impact assessment;
 - Tenure mix, affordable housing and viability ;
 - Dwelling mix including wheelchair housing;
 - Density;
 - Quality of residential accommodation;
 - Design, layout, heritage assets and impact on Borough and London views;
 - Landscaping and trees;
 - Outdoor amenity space, children's playspace and public open space;
 - Impact of proposed development on amenity of adjoining occupiers and surrounding area;
 - Transport and highways;
 - Noise and vibration;
 - Energy and sustainability;
 - Ecology and biodiversity;
 - Air quality;
 - Water resources and flood risk;
 - Archaeology;
 - Wind microclimate;
 - Socio-economic impacts;
 - Planning obligations (s106 undertaking or agreement);
 - Community involvement and engagement;
17. These matters are discussed in detail in the 'Assessment' section of this report.

Legal context

18. 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.
19. 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

National Planning Policy Framework 2019

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

The London Plan 2016

- 21. Policy 2.9 Inner London
 - Policy 2.13 Opportunity Areas and Intensification Areas
 - Policy 2.18 Green Infrastructure: the multi-functional network of green and open spaces
 - Policy 3.1 Ensuring Equal Chances for All
 - Policy 3.2 Improving health and addressing health inequalities
 - Policy 3.3 Increasing housing supply
 - Policy 3.4 Optimising housing potential
 - Policy 3.5 Quality and design of housing developments
 - Policy 3.6 Children and young people's play and informal recreation facilities
 - Policy 3.8 Housing choice
 - Policy 3.9 Mixed and balanced communities
 - Policy 3.10 Definition of affordable housing
 - Policy 3.11 Affordable housing targets
 - Policy 5.1 Climate change mitigation
 - Policy 5.2 Minimising carbon dioxide emissions
 - Policy 5.3 Sustainable design and construction
 - Policy 5.7 Renewable energy
 - Policy 5.8 Innovative energy technologies
 - Policy 5.9 Overheating and cooling
 - Policy 5.10 Urban greening
 - Policy 5.11 Green roofs and development site environs
 - Policy 5.12 Flood risk management
 - Policy 5.13 Sustainable drainage
 - Policy 5.16 Waste net self-sufficiency
 - Policy 5.17 Waste capacity
 - Policy 5.18 Construction, excavation and demolition waste
 - Policy 6.2 Providing public transport capacity and safeguarding land for transport
 - Policy 6.3 Assessing effects of development on transport capacity
 - Policy 6.9 Cycling
 - Policy 6.10 Walking
 - Policy 6.13 Parking
 - Policy 7.1 Lifetime neighbourhoods
 - Policy 7.2 An inclusive environment

Policy 7.3 Designing out crime
 Policy 7.4 Local character
 Policy 7.5 Public realm
 Policy 7.6 Architecture
 Policy 7.7 Location and design of tall and large buildings
 Policy 7.8 Heritage assets and archaeology
 Policy 7.11 London view management framework
 Policy 7.12 Implementing the London view management framework
 Policy 7.14 Improving air quality
 Policy 7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes
 Policy 7.18 Protecting open space and addressing deficiency
 Policy 7.19 Biodiversity and access to nature
 Policy 7.21 Trees and woodlands
 Policy 8.2 Planning obligations
 Policy 8.3 Community infrastructure levy

Core Strategy 2011

22. Strategic Policy 1 – Sustainable development
 Strategic Policy 2 – Sustainable transport
 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 11 – Open spaces and wildlife
 Strategic Policy 12 – Design and conservation
 Strategic Policy 13 – High environmental standards

The Southwark Plan 2007 – Saved Policies

23. Policy 2.5 – Planning Obligations
 Policy 3.1 - Environmental Effects
 Policy 3.2 – Protection Of Amenity
 Policy 3.3 – Sustainability Assessment
 Policy 3.4 – Energy Efficiency
 Policy 3.6 – Air Quality
 Policy 3.7 – Waste Reduction
 Policy 3.8 – Waste Management
 Policy 3.11 - Efficient Use Of Land
 Policy 3.12 – Quality In Design
 Policy 3.13 – Urban Design
 Policy 3.14 –Designing Out Crime
 Policy 3.18 - Setting Of Listed Buildings, Conservation Areas And World Heritage Sites
 Policy 3.19 – Archaeology
 Policy 3.20 – Tall Buildings
 Policy 3.28 – Biodiversity
 Policy 4.2 - Quality Of Residential Accommodation
 Policy 4.3 - Mix Of Dwellings

Policy 4.4 - Affordable Housing
Policy 4.5 - Wheelchair Affordable Housing
Policy 5.1 - Locating Developments
Policy 5.2 - Transport Impacts
Policy 5.3 – Walking And Cycling
Policy 5.7 – Parking Standards For Disabled People And The Mobility Impaired

Supplementary Planning Documents and Guidance

24. Draft Old Kent Road Area Action Plan 2017
2015 Technical Update to the Residential Design Standards (2011)
Section 106 Planning Obligations and Community Infrastructure Levy (CIL)
SPD 2015
Mayor of London Housing SPG 2016

Emerging planning policy

25. Draft New London Plan

The draft New London Plan was published on 30 November 2017 and the first and only stage of consultation closed on 2nd March 2018. Following an Examination in Public, the Mayor then issued the Intend to Publish London Plan, which was published in December 2019.

The Secretary of State responded to the Mayor in March 2020 where he expressed concerns about the Plan and has used his powers to direct changes to the London Plan. The London Plan cannot be adopted until these changes have been made.

The draft New London Plan is at an advanced stage. Policies contained in the Intend to Publish (ItP) London Plan published in December 2019 that are not subject to a direction by the Secretary of State carry significant weight. 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.

26. New Southwark Plan

For the last 5 years the council has been preparing the New Southwark Plan (NSP) which will replace the saved policies of the 2007 Southwark Plan and the 2011 Core Strategy. The council concluded consultation on the Proposed Submission version (Regulation 19) on 27 February 2018. The New Southwark Plan Proposed Submission Version: Amended Policies January 2019 consultation closed in May 2019. These two documents comprise the Proposed Submission Version of the New Southwark Plan.

These documents and the New Southwark Plan Submission Version (Proposed Modifications for Examination) were submitted to the Secretary of

State in January 2020 for Local Plan Examination. The New Southwark Plan Submission Version (Proposed Modifications for Examination) is the council's current expression of the New Southwark Plan and responds to consultation on the NSP Proposed Submission Version.

In April 2020 the Planning Inspectorate provided their initial comments to the New Southwark Plan Submission Version. It was recommended that a further round of consultation take place in order to support the soundness of the Plan. Consultation is due to take place on this version of the NSP between June and August 2020. The final updated version of the plan will then be considered at the Examination in Public (EiP).

It is anticipated that the plan will be adopted in late 2020 following the 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.

Consultation responses from members of the public

27. Five comments have been received in relation to this application from members of the public, four objections and one neutral comment. The following relevant planning matters were raised:
- Nearby industrial use (it is recognised that the existing estate is in similar proximity to the nearby industrial estate as the proposed blocks. The new units are not deemed to conflict with this use any more than existing units)
 - Noise impact from the industrial estate to the new units
 - Height
 - Daylight/sunlight
 - Noise
 - Impact on local bus network
 - Privacy
 - Community involvement

ASSESSMENT

Principle of the proposed development in terms of land use

28. There are no protections around the existing car parking spaces in terms of planning policy, and the proposed residential use would be in keeping with that of the wider Rennie Estate. Therefore, notwithstanding further considerations set out in detail below, the provision of new housing on the site would be acceptable in principle.

Tenure mix, affordable housing and viability

29. The proposal would provide 49 100% council homes, which would present a significant contribution towards the council's affordable housing targets, and towards meeting the needs of the boroughs residents. As such, this aspect of

the scheme is welcomed and acceptable.

Dwelling mix including wheelchair housing

30. As per the table under Details of Proposal, the tenure mix would equate to 41% 1b2p units. While this would be marginally above the 40% limit under Strategic Policy 7 [Family Homes] of the Core Strategy 2011, this difference is marginal, and would be acceptable on balance.
31. Furthermore, the scheme would provide 24% family sized housing (3+ beds) and would include 2 x 4-bed units, which would exceed the 20% requirement within the urban zone, and is a welcome aspect of the scheme.
32. Finally, four units would be wheelchair accessible, comprised of 16 habitable rooms. This would equate to 10.2% on a habitable rooms basis, which would be an acceptable level of provision in this regard.
33. In summary, the proposal would provide good levels of family housing and wheelchair accessible housing, and is acceptable in terms of housing mix.

Density

34. The proposed blocks would be comprised of a total of 156 habitable rooms. Combined with the 104 habitable rooms of the existing Trevithick House block, this would result in a total of 260 habitable rooms within the development site. This would in turn equate to 795 habitable rooms per hectare on site.
35. This figure would exceed the 700 habitable rooms per hectare limit of the urban zone under Strategic Policy 5 [Providing New Homes] of the Core Strategy. However, this policy also states:

Within the opportunities areas and action area cores the maximum densities set out above may be exceeded when developments are of an exemplary standard of design.

36. Given the site is located within the Old Kent Road Opportunity Area, and is of an exemplary standard of design (see full design section below); it is considered the exceedance of the density range of the urban zone would be acceptable in line with Strategic Policy 5.

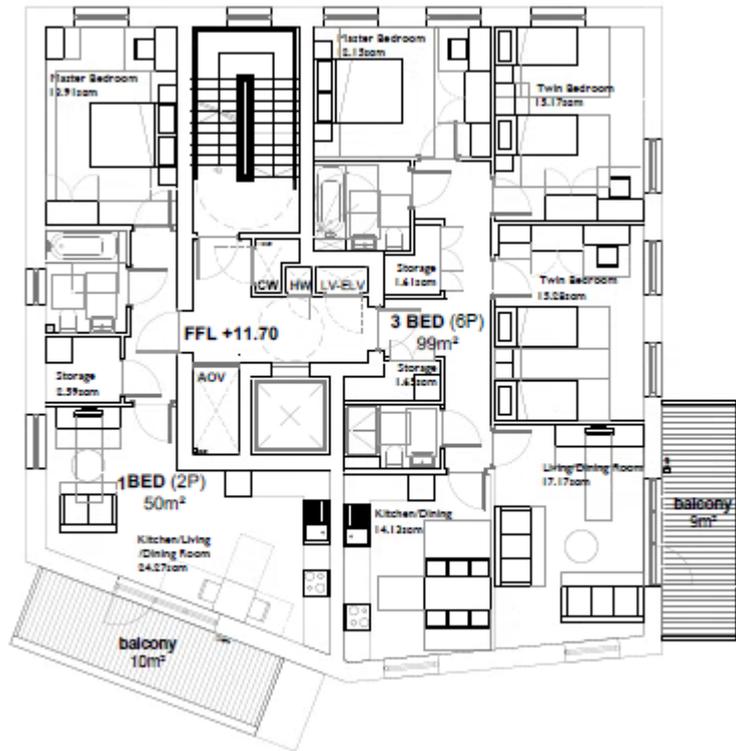
Quality of residential accommodation

37. The proposed dwellings would be spacious, often exceeding the space standards of the Residential Design Standards SPD. These dwellings would all be dual aspect, offering excellent access to natural light, and cross ventilation. Each unit would benefit from a minimum of 10sqm of private outdoor amenity space in the form of balconies, or gardens in the case of the ground floor units. Therefore, the proposed quality of accommodation would be of an excellent standard.

38. Example floor plan: Block A – Third floor



39. Example floor plan: Block B – Third Floor



40. It is noted that the applicant's noise impact assessment demonstrates that the noise from the adjacent industrial estate at night shows the level of commercial noise is +6.7dB above background. British Standard BS8233 states "*Where development is considered necessary or desirable, despite external noise levels above WHO guidelines, the internal target levels may be relaxed by up to 5 dB and reasonable internal conditions still achieved*". Therefore, there is a minor risk of internal noise levels exceeding the +5dB standard, by 1.7dB. The proposed solutions to this are a combination of alternative ventilation (specifically MVHR [Mechanical Ventilation with Heat Recovery] units within each flat) and keeping windows shut at night. It is considered the properties most likely to be affected are those with North facing elevations, closest to the industrial estate. Given these properties have North facing windows, solar gain and overheating are less likely to present issues for occupiers to this side, and keeping windows shut at night offers a reasonable solution to this issue. Similarly, noise from the industrial estate is likely to be lower at night when most businesses are typically closed. Thus, the minor exceedance of internal noise levels when some windows are left open is not considered to present a significant risk to the overall quality of accommodation. A condition is recommended requiring each unit to achieve reasonable internal noise levels to preserve the amenity of occupiers.

41. In summary, the proposed quality of accommodation would be excellent, and is a positive aspect of the scheme.

Design, layout, heritage assets and impact on borough and London views

42. The 12-storey main block A would approximately match the height of the existing tower blocks to provide a third tower on the estate (see comparative diagram below). The block will have a more complex 'faceted' shape as compared to the square existing towers, and will have, instead of the panel system of the towers, brick facades. There will be a pronounced shoulder line at the seventh floor. This visual trick will reduce the apparent scale of the building as viewed from the immediate street and will enable it to relate better to other street buildings, in particular Galleywall School immediately opposite.
43. Height comparison of proposed blocks with existing tower block



44. Block B is adjacent to the main block A and again fronts onto Galleywall Street. It is much smaller at five storeys and also more slender with only two units per floor (as compared to four of the main building). Its height is akin to the school building just opposite and other medium height buildings in the vicinity. As with the larger block it has a more complex faceted footprint and outline.

45. The basic layout, of a third estate tower and a low 'townscape' block responding to the scale of lower buildings in the area, is appropriate. The two block approach' also allows for a useful route between the blocks which will ensure greater connectivity for the estate in general. The layout will also allow the creation of a sequence of open spaces of different functions between the new complex and existing blocks. This will be an attractive visual amenity in itself and also a community benefit.
46. Block A would exceed 30m in height, and would therefore be classified as a tall building which must be assessed against Saved Policy 3.20 of the Southwark Plan. This states that any building over 30 metres tall should ensure that it makes a positive contribution to the landscape, is located at a point of landmark significance, is of the highest architectural standard, 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.
47. The proposed 'tall' building element meets the requirements of the above policy. It would be in keeping with its current context of taller residential buildings, would offer a new public landscaped areas as further improvements to the public realm within the wider estate area. It is at a point of minor landmark significance at a junction where the character of the area changes from low industrial buildings to the school and to the buildings of the estate itself. The use of well considered and detailed brick facades with strong sculptural elements in the form of brick faced projecting balconies alternating with recessed balconies, and its picturesque faceted form will again make it and its adjacent lower block stand out from other estate buildings as local landmark at the entrance to the estate. This is acceptable as regards the requirements of the tall buildings policy.
48. In summary, the proposal would present two modern, attractive pieces that respond positively to each other, as well as the surrounding estate and wider townscape.

49. Proposed CGI view from Lynton Road



50. Proposed CGI from Galleywall



Landscaping and trees

51. The submission included an arboricultural assessment which has been reviewed by the council's Urban Forester. The proposal would see the loss of one category C tree on site. Given the size of the wider site this could be easily replanted as part of the wider landscaping plan.
52. While some details of the proposed landscaping have been included, these remain at an early stage and information is relatively limited. A condition is recommended requiring details of hard and soft landscaping across the site to include the provision of a replacement tree at a minimum, through further planting is encouraged. Subject to this the proposal is acceptable in this regard.
53. The GLA stage one report has requested details of the urban greening factor of the site in respect of the emerging London Plan Policy G5. The scheme would achieve an urban greening factor of 4.08 which would be within policy G5s requirement of predominantly residential schemes achieving a minimum factor of 4.

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

54. Based on the population yield calculator provided by the GLA, the proposal would have an estimated child population of 46.5, with the following breakdown:
- 0-4 year olds: 19.3
 - 5-11 year olds: 15.3
 - 12-15 year olds: 7.8
 - 16-17 year olds: 4.1
55. 195.3sqm of dedicated 0-4 year olds playspace would be created in the immediate vicinity of the site. An existing playground (approximately 100m from the new homes) on site would be expanded by 150sqm to accommodate 5-11 year olds playspace. This would meet the 10sqm per child playspace requirements as set out in the S106 and CIL SPD.
56. A further 280sqm of communal amenity space is proposed in the area between the new blocks and the existing Trevithick House block. This would be well in excess of the 50sqm of communal amenity space required by the Residential Design Standards SPD, providing additional amenity space for 12-17 year olds, as well as existing estate residents which is a welcome addition of the scheme.
57. In summary, the scheme would offer an excellent provision of communal amenity space and playspace for new and existing residents of all ages.

Site plan indicating playspace and amenity areas



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

58. **Daylight/sunlight**

The applicant has submitted a daylight/sunlight assessment as part of this application, which has assessed the impact of the proposed blocks on surrounding properties in terms of daylight/sunlight access. Findings vary depending on the properties assessed and are set out below.

59. Trevithick House

156 habitable room windows on this property were assessed. All site facing kitchen windows were found to be compliant with Building Research

Establishment (BRE) guidelines. 10 primary living room windows (i.e. not including the smaller pieces of glazing which open onto the balcony) would not meet BRE guidelines on daylight reduction (i.e. a proportional reduction of 20% or more). These 10 living room windows would see proportional Vertical Sky Component reductions of between 20.05% and 39.81%. However, each of these 10 would maintain VSCs above 20%, which is good in an urban context, and would be acceptable on balance. Furthermore, all of these living rooms would meet the No Sky Line tests, ensuring adequate daylight within these rooms.

60. Of the 52 bedroom windows assessed, 31 would not meet the VSC guidance. However, these 31 are set beneath balconies, which BRE guidance allows to be removed for subsequent testing. When the 'without balconies' testing is carried out, this reduces the number which would fail to meet BRE guidance to 23. Of these 23, 17 would retain overall VSCs of above 20%, which as noted above is good within an urban context, and the remaining 6 would retain VSCs of over 17%, which is reasonable in an urban context. As in the case of the living areas, all 52 bedrooms would also fully comply with NSL guidance. Therefore, the impact to these rooms is considered to be to an acceptable level.
61. All kitchens assessed within Trevithick House would comply with both VSC and NSL guidelines.
62. In terms of impacts on sunlight, 91 rooms within Trevithick House have windows oriented 90 degrees due South of the site. Of these, 20 would see reductions in sunlight beyond BRE guidance. However, these 20 sit underneath balconies, and subject to further testing without these balconies, would experience impacts within the acceptable levels of BRE guidance.
63. In summary, while there would be a modest impact on some habitable rooms with Trevithick House, this would be to an acceptable level on balance.

64. Barlow House

134 windows at Barlow House were assessed as part of the daylight/sunlight assessment, and where reductions would be seen at these properties, these reductions would be in line with BRE guidance, in terms of both daylight and sunlight.

65. Francis Bacon Court

Testing has found the majority of windows at this property would meet BRE guidelines in terms of daylight and sunlight. 3 secondary windows would not meet BRE guidance, though the rooms these windows serve are already served by at least 3 other windows which retain good VSC and meet guidelines in terms of reductions, therefore, these impacts are negligible. Overall, there is not considered to be a significant impact to these properties.

66. 66-74 Galleywall Road

Testing has determined all windows at these properties would meet the BRE guidelines in terms of daylight and sunlight impacts, and as such there is not considered to be any significant impact to these units.

67. Galleywall School Caretaker's House

Council tax records indicate this property to be in use as a residential property, though the internal layout is not known. Testing indicated 2 windows would receive VSC reductions over 20%, between 32.65-35.21%. However, each of these windows would continue to receive overall VSC results of over 20%, which would be good in an urban context. Thus, the impact to this property would be to an acceptable degree on balance.

68. Galleywall Primary School

Though not a residential property, the use of the school as an educational establishment would necessitate reasonable access to natural light for staff and pupils. As such, the school has also been assessed as part of the wider daylight/sunlight assessment.

69. Of the windows assessed within the school, only 3 would see VSC results marginally above BRE guidance (between 20.77% and 22.70%), and these serve rooms which are served by multiple other windows which continue to receive very good levels of VSC, typically over 20%. As such, the overall impact to the school is negligible and acceptable.

Overshadowing

70. Shadow path testing conducted as part of the daylight/sunlight assessment has determined that the vast majority of gardens and amenity areas in the locality would be unaffected by the proposed development. The sole impact would be an amenity area of Trevithick House, which would see a maximum reduction of sunlight of 1.6%, which would be negligible and well within BRE guidelines. As such, the proposal is not considered to present a significant risk in terms of overshadowing to nearby properties.

Privacy

71. The closest direct views from the proposed blocks would be from Block A towards Trevithick House; this is only a concern from secondary, North-East facing windows from kitchen/dining/living areas. Given the separation distance between these windows and Trevithick House are approximately 17m, the applicant has proposed obscured glazing a solution to privacy issues which is an acceptable measure.

72. Notwithstanding the resolved issue above, the blocks would otherwise maintain separation distances in excess of 25m from other nearby sensitive residential properties, thus any further risk in terms of privacy and overlooking

would be minimal and to an acceptable degree.

Loss of outlook

73. Block A would sit at an oblique angle to the units within Trevithick House facing the site, and thus would not have a significant impact on outlook to these units. Similarly, while Block B would sit more directly in front of these units, as the separation distance would be in excess of 25m, the impact on outlook as a result would be minor and to an acceptable degree.
74. Units with Barlow House to the North-East of the site will see a modest impact on outlook, primarily from Block A given its comparative scale. Though, given the separation distance would be over 50m, this impact would be moderate, and should be balanced against the benefits of the number of new homes being provided, and the improvements to the estate which residents of Barlow House would benefit from. Thus, on balance the impact on outlook would be acceptable.

Sense of enclosure

75. Each block would be of a comparable scale to similar blocks within the estate; with Block A of a similar profile to other towers, and Block B being of comparable scale to elements such as Barlow House. As noted above, the blocks maintain reasonable separation distances from existing units. Thus, the proposal is not considered to create a significant sense of enclosure for surrounding properties.

Noise

76. The creation of the new external balconies and amenity areas are not considered to generate a significant additional amount of noise which would impact on nearby occupiers, due to the distance of the proposed block from nearby properties, and the use being akin to the existing residential towers within the estate.

Energy and sustainability

77. The energy assessment included as part of this application details the range of energy saving measures incorporated into the scheme through the energy hierarchy (Be Lean, Be Clean, Be Green), which result in a 62% carbon emission saving over Part L of Building Regulations.
78. The scheme has included a range of measures including high performance building fabric, high performance lighting (part of Be Lean), and most crucially air source heat pumps (as part of Be Clean, and Be Green) which provide the majority of the carbon savings (57% of the total).
79. Other measures have been reviewed and deemed in effective or unsuitable on site, including ground source heat pumps (expensive, and potentially

negative impacts on nearby green spaces), bio-fuel combined heat and power (maintenance intensive, and require significant plant rooms), and photo voltaic panels (the impact of PV panels on site would be negligible given the limited roof space and the cost of installing and maintaining these for limited benefit is recognised; and revised carbon factors published by the GLA).

80. It is considered the scheme has assessed a broad swathe of options and where possible implemented measures to achieve a good reduction in carbon emissions. However, the scheme would not achieve a 100% reduction in emissions, and the remaining reductions would be compensated for via an offset payment as part of the S106 agreement. This offset figure would be set at £34,648. Subject to this, the proposal would be acceptable in terms of energy and sustainability.

Ecology and biodiversity

81. The proposal has incorporated a number of features to improve biodiversity around the site as part of the landscaping enhancements to the estate. These measures including planting for pollinating insects, and wildflower meadows. Further improvements shall be secured by condition including bird and bat boxes. Overall, the proposal offers a good opportunity to enhance the ecological value and biodiversity of the estate.

Water resources and flood risk

82. The applicant has supplied a flood risk assessment as part of this proposal which has been reviewed by the councils flood risk engineer. Following discussions between the applicant and the councils Flood Risk Engineer, and the Stage 1 report of the GLA, an updated flood risk assessment and drainage strategy have been submitted. The council's Flood Risk Engineer is satisfied with the updated FRA and drainage details subject to the inclusion of a condition requiring submission of details of a Sustainable Urban Drainage System (SUDS), and the inclusion in the legal agreement of a contribution totalling £7,085 towards off-set drainage, which has been agreed by the applicant.

Transport and highways

83. Cycle parking

88 cycle parking spaces have been proposed as part of this development, with a further 4 visitor spaces, bringing the total to 92. The breakdown of these spaces and their location is given under the details of the proposal above.

84. It is noted that the cycle parking for block B would be contained within block A. This is due to the spatial constraints of the site, which would result in a loss of habitable room size within block B were the cycle parking to be relocated. Given the short distance between the blocks this would be acceptable on balance.

85. Car parking

The proposal would require 8 car parking spaces within the estate to be relocated (also within the estate). Given these spaces are existing (and permit dependent), their relocation is not considered to be resulting in the creation of new car parking spaces and is acceptable in this regard.

86. Two parking bays for blue badge holders are proposed, as well as the relocation of another blue badge parking bay, equating to 4% coverage of the proposed units. Given the site constraints and reasonable access to public transport, this provision is considered acceptable.
87. The loss of the existing garages is not considered to present a significant risk to the local road network, given their relatively low number and that typically garages are often used as storage units rather than as dedicated car parking spaces.
88. A condition requiring the provision of a minimum of two electric vehicle charging points in the car parking area is recommending. Subject to this and the considerations above the proposal is acceptable in this regard.

Servicing and deliveries

89. It is recognised that existing deliveries of the estate take place on estate roads, and that this would remain in place for the proposed units. Deliveries are controlled within an allotted 20 minute drop off time under existing arrangements.
90. Based on TRICS (Trip Rate Information Computer System) analysis it is expected that the 49 dwellings will create four servicing arrivals and four departures per day, which is infrequent. The internal estate roads provide adequate provision for the infrequent servicing which will likely fall into existing demand, primarily in the form of supermarket deliveries, as well as online retailers. As such, the proposed development is not deemed to present a significant risk to the local transport network based on this infrequent delivery arrangement.
91. In terms of waste management, each block has been designed to accommodate a waste storage area, in consultation with the council's Highways and Waste Management divisions. In order to allow for safe collection the removal of one parking bay to facilitate the installation of the dropped kerb has been proposed, and is considered an acceptable solution.
92. It is noted under the GLA's stage one report they have recommended the conversion of 3 parking bays on Galleywall road into a loading bay. This approach will not be adopted as refuse servicing would be adequately provided under the existing arrangements without the loss of these parking spaces exacerbating the already high levels of parking stress on Galleywall road, particularly at night where stress is at 97% based on the transport

assessment conducted as part of this application.

93. In summary, the proposal is considered to have appropriately addressed the delivery and servicing needs of the new units, and these are not deemed to present a risk to the local transport or highways networks.

Archaeology

94. The applicants have submitted a desk based assessment (DBA) with this application by Compass Archaeology and dated May 2019, but they have not submitted an evaluation report, required by Saved Policy 3.19 of the Southwark Plan (2007).
95. The DBA concluded that the site has '*a high potential for prehistoric environmental remains... and a low to moderate potential for encountering cultural finds and features of this period*'. The proposed development buildings do not contain basements; as stated in the DBA: 'Although the details of the foundation design are currently unknown, it is anticipated they will require a substantial foundation with deep piling undertaken given the number of storeys and the underlying geological deposits.'
96. Based on the available evidence, a series of conditions are recommended to allow for the development to progress, while maintaining protections for any archaeological findings on site, including a further archaeological assessment, and foundation design details. Subject to these conditions, the proposal would be acceptable in this regard.

Planning obligations (S.106 undertaking or agreement)

97.

Planning obligation	Mitigation	Applicant's position
Local Economy and Workspace		
Local economy: Construction phase jobs/ contributions	Place a minimum of 10 Unemployed Borough Residents into Sustained Construction Industry Employment Train a minimum of 10 Borough residents using Short Courses; Provide a minimum of 2 new Construction Industry Apprenticeships or NVQ Starts; Ensure that their contractors and sub	Agreed

	<p>contractors shall work with the Construction Workplace Co-ordinator and with local employment and skills agencies approved by the council to recruit Borough residents into Construction Industry Apprenticeships; and</p> <p>Produce the Construction Industry Employment and Training Report.</p>	
Housing, Viability and Amenity Space		
Affordable (social rent and intermediate) housing Provision	49 x Social Rent units	Agreed
Wheelchair housing provision	4 x wheelchair units	Agreed
Transport and Highways		
Highway works	<ul style="list-style-type: none"> • Construction of a build out on Galleywall Road with dropped kerb access for refuse bins. • Installation of a dropped kerb on Rennie Estate Access Road for refuse bin access. • Repavement of the footway fronting the development on Galleywall Road including new kerbing (precast concrete paving slabs with 150mm wide granite kerbs). 	Agreed
Energy, Sustainability and the Environment		
Carbon off-set fund	£34,648	Agreed
Future proofing connection to District Heating	Submission of a District Heating Strategy	Agreed
Off-set drainage	£7,085	Agreed

Administration fee	Payment to cover the costs of monitoring these necessary planning obligations calculated as 2% of total sum.	Agreed
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98. If in the event that a unilateral undertaking has not been agreed by 31 March 2021 then the director of the planning be instructed to refuse planning permission for the following reason:

In the absence of a signed legal agreement, the proposal would fail to provide suitable mitigation in terms of planning gain, contrary to saved policies 2.5 (Planning Obligations) 3, SP14 (Implementation and Delivery) of the LB Southwark Core Strategy 2011, and 8.2 (Planning Obligations) of the London Plan 2016, and the LB Southwark Section 106 Planning Obligations/CIL SPD 2015.

Mayoral and borough community infrastructure levy (CIL)

99. Based on the floor areas provided in the agent's CIL Form dated 21-Jan-20, the gross amount of CIL is approximately £1,487,031.23 consisting £279,844.29 of Mayoral CIL and £1,207,186.94 of Borough CIL. 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.

In addition, there is potential for the council to claim full CIL social housing relief for this 100% affordable housing proposal, as the landowner and developer. All CIL relief claim must be submitted by the project manager prior the commencement of development.

Community involvement and engagement

100. The Developer's Charter included as part of this application submission outlines the positive steps taken by the applicant in engaging the local community. This includes details of meetings with Tenants and Residents Associations (T&RAs), local ward members, and open public events to explain and understand resident's concerns around issues including design and daylight/sunlight impacts. It is considered that the applicant has actively engaged with the local community and adopted their comments and concerns into the final proposal, which is welcomed.

Consultation responses, and how the application addresses the concerns raised

Community impact and equalities assessment

101. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights
102. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
103. 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:
 1. The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
 2. 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
 3. 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.
104. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

Human rights implications

105. 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.
106. This application has the legitimate aim of providing new affordable housing. 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.

Positive and proactive statement

107. The council has published its development plan and Core Strategy on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
108. The council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the development plan and core strategy and submissions that are in accordance with the application requirements.

Positive and proactive engagement: summary table

Was the pre-application service used for this application?	YES
If the pre-application service was used for this application, was the advice given followed?	YES
Was the application validated promptly?	YES
If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	YES
To help secure a timely decision, did the case officer submit their recommendation in advance of the statutory determination date?	A time extension has been sought to allow for the completion of the unilateral undertaking and referral to the GLA

CONCLUSION

109. The proposal would result in 49 much needed council homes which will contribute towards the council's target of 11,000 new council homes, and be of a high standard of accommodation and design for residents. The proposal would have a minimal impact on nearby neighbouring amenity; and, subject to appropriate mitigation measures, would have an acceptable and management impact on the local transportation network. In addition, the proposal would improve landscaping and play facilities across the Rennie Estate to the benefit of the wider estate and community.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Chief Executive's Office 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 0254 Council website: www.southwark.gov.uk

APPENDICES

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

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Glenn Ruane, Team leader (FT)	
Version	Final	
Dated	4 November 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		5 November 2020