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Item No. 8.1	Classification: Open	Date: 6 January 2020	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 20/AP/1329 for: FULL PLANNING APPLICATION Address: 313-349 ILBERTON ROAD, LONDON SE15 1NW Proposal: Demolition of existing buildings and construction of two buildings, one of part 11 and 13 storeys and one of part 13 and 15 storeys, to provide 1,526sq.m (GIA) of commercial floorspace, 250 student accommodation bed spaces (Sui Generis) and 58 residential units, with associated access and highway works, amenity space, cycle parking spaces, disabled car parking spaces and refuse/ recycling stores. 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.		
Ward(s) or groups affected:	Old Kent Road		
From:	DIRECTOR OF PLANNING		
Application Start Date	12/05/2019	Application Expiry Date	11/08/2020
Earliest Decision Date	28/07/2020		

RECOMMENDATION

1. a) That planning permission is granted, subject to conditions and referral to the Mayor of London, and the applicant entering into an appropriate legal agreement by no later than the 6 August 2021.
2. b) In the event that the requirements of (a) are not met by 6 August 2021 that the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 298 of this report.

EXECUTIVE SUMMARY

3. The scheme proposes to redevelop an existing light industrial and distribution site on

the eastern side of Ilderton Road to provide a mixed-use commercial, residential and student accommodation development of 250 student bed spaces, 58 residential units and 1526sqm of light industrial commercial floorspace. The subject site is located in a Strategic Preferred Industrial Location and would represent a departure from policy by virtue of proposing the introduction of residential accommodation to a Preferred Industrial Location. A scheme of the same external built envelope was considered by planning committee on 04/12/2018 (ref 171/AP/4819). That scheme was for housing and commercial use only and committee were minded to approve it. A direct comparison between the two schemes is provided in the table below.

4. The development currently under consideration proposes 100% affordable conventional residential housing comprising 58 affordable units, with a proposed tenure split of 71% social rented and 29% intermediate by unit – this is an uplift of 12 units from the previous scheme (ref. 17/AP/4819). In addition, 35% affordable student bed spaces also forms part of the development, which equates to 87 bed spaces. There would also be the potential for a significant uplift in jobs on the site through the provision of good quality, flexible commercial space that has been specifically designed for light industrial use that would include units of varying size, and improved servicing arrangements. There would be a small loss of 135sqm of commercial space compared to the scheme approved in 2018 (to be confirmed) as a result of an overall increase in cycle parking to meet draft New London Plan cycle parking standards. That would be mitigated by a financial contribution.
5. The development would include two buildings of 15 storeys and 13 storeys in height and would be of a high quality of design that delivers the master-planning and aspirations of the draft Old Kent Road Area Action Plan. A policy compliant mix of dwellings and wheelchair accessible housing would be provided, together with a good standard residential accommodation. The daylight and sunlight impacts analysis demonstrates that there would be some harm to neighbouring occupiers; however, it is considered to be limited harm caused to existing residential amenity as a consequence of the development. Sound proofing within the new dwellings would limit the potential for noise complaints against future commercial occupiers.
6. The development would be car free apart from three accessible parking spaces, and future occupiers would be prevented from obtaining parking permits on the surrounding streets. A s106 contribution is to be secured to improve local bus capacity.
7. The development would incorporate measures to reduce its carbon dioxide emissions, and would be net carbon neutral with a contribution to the Council's Carbon Off-set Green Fund would be secured through the s106 agreement.
8. Overall, the scheme complies with adopted and emerging development plan policies, and it is recommended that planning permission be granted, subject to conditions, the s106 agreement and referral to the GLA.

Comparison to approved 2017 Scheme – 17/AP/4819

9. Members resolved to approve the previous scheme under planning reference 17/AP/4819 on 04/12/2018. The description of development read as follows:

'Full application for full planning permission for mixed use redevelopment comprising: Demolition of existing buildings and construction of two buildings one of part 11 and 13 storeys and one of part 13 and 15 storeys to provide 1,661sqm (GIA) of commercial floorspace (use class B1) at part basement, ground and first floors, 130 residential dwellings above (44 x 1 bed, 59 x 2 bed and 27 x 3 bed), with associated access and highway works, amenity areas, cycle, disabled and commercial car parking and refuse/recycling stores.

(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).

10. The tables below demonstrates a direct comparison between the application scheme and the scheme approved by Members under reference 17/AP/4819:

Item	Previous Scheme	Current Scheme
<u>Number of Units</u>	130 dwellings	58 dwellings 150 student bedspaces
<u>Residential Unit Mix</u>	51 x 1-bed (39.2%) 52 x 2-bed (40%) 27 x 3-bed (20.8%)	22 x 1-bed (37.93%) 24 x 2-bed (41.38%) 12 x 3-bed (20.69%)
<u>Student Unit Mix</u>	N/A	212 ensuite rooms 13 wheelchair accessible ensuite rooms 25 studios
<u>Accessible Units</u>	10% residential	10% residential 5% student
<u>Affordable Housing</u>	46 of 130 units (35%) 136 of 373 hab rooms (36.4%)	58 of 58 units (100%) 164 of 164 hab rooms (100%)
<u>Tenure Split</u>	Tenure split of 65:35 social rent to intermediate – equivalent to 30 social rent units and 16 intermediate	Tenure split of 71:29 social rent to intermediate – equivalent to 41 social rent units and 17 intermediate units

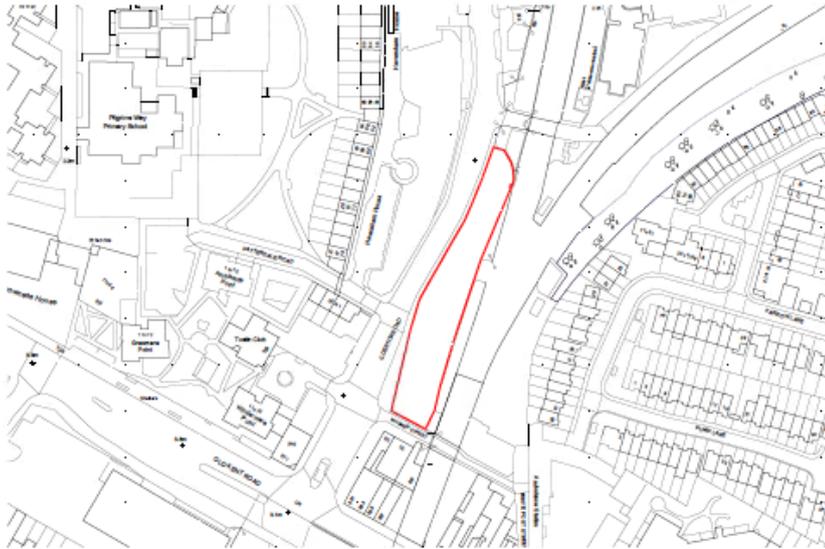
	units	
<u>Affordable Student</u>	N/A	87 of 250 bedspaces (35%)
<u>Residential Amenity Space</u>	1,092sqm private amenity space 562sqm communal amenity space	507sqm private amenity space 247.1sqm communal amenity space
<u>Residential Play Space</u>	125sqm	153sqm
<u>Student Amenity Space</u>	N/A	195sqm indoor communal amenity space 132sqm outdoor communal amenity space
<u>Aspect</u>	71% dual aspect units No north facing single aspect units No single aspect 3-bed units	68% dual aspect No north facing single aspect units No single aspect 3-bed units
<u>Commercial Floorspace</u>	1,661sqm (Light Industrial)	1,526sqm (Light Industrial)
<u>Affordable Commercial Floorspace</u>	10%	10%
<u>Heights</u>	Two buildings. One building part 11, part 13 storeys and one building part 13, part 15 storeys	Two buildings. One building part 11, part 13 storeys and one building part 13, part 15 storeys
<u>Car Parking</u>	Car free 3 disabled parking bays	Car free 3 disabled parking bays
<u>Cycle Parking</u>	224 residential cycles 25 commercial cycles	107 residential cycles 195 student cycles 26 commercial cycles

BACKGROUND INFORMATION

Site location and description

11. The subject site is roughly rectangular in shape and measures approximately 0.02 hectares. 313-320 Ilderton Road is currently in use as a tyre dealer's yard, Euro Tyres. 321-343 is occupied by leaflet distribution services business, LDS (Leaflet Distribution Services), specialising in the distribution of advertising material across the UK. 344- 349 Ilderton Road is currently in use as a builder's merchant yard, Floyds Builders Merchant.
12. The subject site is bounded by Ilderton Road to the west, Wagner Street to the south and the railway viaduct and associated arches and embankment to the east. The surrounding area comprises a mixture of buildings used for industrial and commercial purposes and high density residential blocks on Tustin Estate. A church, the Redeemed Christian Church of God is located on the southern side of Wagner Street at 30 Wagner Street. The site is predominantly covered by one and two storey buildings, associated structures and yard space, with a high boundary wall fronting Ilderton Road and Wagner Street.
13. The subject site is not located within a Conservation Area, nor is it within the setting of a Listed Building. It is not located within a protected borough view, but does fall within the background of London View Management Protected Vista of 2A.1, which protects views from Parliament Hill Summit to St. Paul's Cathedral. The borough boundary between Southwark and Lewisham runs along the eastern edge of the site. No part of the application site is located within Lewisham.
14. The following designations apply to the subject site:
 - Old Kent Road Preferred Industrial Location
 - Bermondsey Lake Archaeological Priority Zone
 - Urban Density Zone
 - Air Quality Management Area
 - Old Kent Road Action Area

Image: Site Location Plan



15. The subject site has a PTAL rating of 4 and is located near a number of bus stops a 5-minute walk from site providing services to locations across central London including 24-hour services. It is also within walking distance of the South Bermondsey Station, and will be located near to the proposed Surrey Canal Road Overground Station.
16. The site is within the boundaries of sub-section OKR 16 of the Old Kent Road Opportunity Area. This sub-section is known as '*Hatcham Road and Ilderton Road*'. The OKR 16 allocation has a total site area of 7.9 hectares with an indicative capacity for the creation of 1,460 new homes and 1,170 new jobs. It is the intention of this allocation to replace existing light industrial employment floorspace whilst also providing residential and mixed use schemes along with on-site servicing.

Details of Proposal

17. The development involves the demolition of all the existing commercial buildings and structures to allow for a mixed-use building with employment, residential and student accommodation uses.
18. The employment uses would be provided at ground floor and first floor in the form of workspaces capable of use by small to medium sized enterprises, start up and creative type businesses within the light industrial use class. 10% of the commercial floorspace will be affordable workspace and is to be secured through the S106 Agreement.
19. Overall, there would be slight decrease in the employment floorspace re-provision when compared to the existing provision as detailed below:

Table: Existing and Proposed Area Schedule

	<u>Existing</u>	<u>Proposed</u>	<u>Difference</u>
	338sqm floorspace	1526sqm floorspace	+1188sqm
	1783sqm yard area	260sqm yard area	-1523sqm

Total	2121sqm	1786sqm	-335sqm
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20. It is noted that the development represents a small reduction in commercial floorspace compared to the previous scheme (ref. 17/AP/4819). However, this is due to improvements and amendments to the internal layout, increasing the footway widths and improving the elevational designs fronting Iderton Road, as requested within the previous scheme. It is considered that the development has been significantly enhanced by these improvements and the proposed quantum of floorspace is therefore considered to be acceptable in this instance, and in relation to the design amendments achieved. A financial contribution will be secured through the S106 Agreement to mitigate this modest under provision of employment floorspace.
21. In terms of residential provision, 58 new residential units are proposed and will consist of 100% affordable. The proposed affordable housing offer comprises a total of 164 habitable rooms or 100% of the habitable rooms. The affordable units would be split between 71% units for social rent and 29% units are intermediate/shared ownership. The habitable rooms breakdown would be 66% social and 34% intermediate comprising of 109 habitable rooms in the social provision and 55 habitable rooms in the intermediate tenure. Also as part of the 58 homes, 10% would be wheelchair accessible units.

Table: Housing mix

Unit size	No. of homes	% of homes
Studio	0	0%
1 bed	22	38%
2 bed	24	41%
3 bed	12	21%
Total	58	100%

22. The student accommodation aspect of the development proposes a total of 250 student bed spaces for students at University of London, secured by nominations agreement. 87 of the bed spaces will be affordable rent, equating to 35% affordable.
23. Based on the minimum 35% policy requirement in accordance with Policy P1 of the emerging NSP, the scheme exceeds policy by providing 100% affordable housing. In addition, based on the 25:10 tenure split for a 35% policy compliant scheme a total of 14 social rented units and 6 intermediate units would be required; the proposals exceed tenure split requirements in that 41 social rented units and 17 intermediate units are provided. Combining the affordable conventional housing and the affordable student accommodation, the development will provide 59% affordable housing by unit, 61% affordable housing by habitable rooms and 62% by GIA.
24. The scheme consists of two linked buildings, one part 11 and 13 storeys, and one of

part 13 and 15 storeys that are linked by a two storey podium. A basement is proposed beneath the two residential cores. Amenity space would be provided for the residential accommodation in the form of projecting private balconies, communal amenity space and children's play space. For the student accommodation aspect of the development amenity space will be provided as internal and external communal amenity space.

25. The proposal would be car free apart from three accessible disabled parking spaces which would be introduced on the northern side of the site, accessible from Ilderton Road. Servicing for the residential and commercial units would be from one new loading bay and increased width footways on Ilderton Road adjacent to the residential cores of the two proposed buildings. Enhancements to the public realm are proposed in the form of new public open space, tree planting and the widening existing footways.

Revisions and Amendments

26. Following discussions with officers, the proposed scheme was revised to increase the amenity space provisions along with changes to the tenure split of the conventional housing. Due to the minor nature of the amendments, the revisions were not consulted upon.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

27. The main issues to be considered in respect of this application are:
 - The principle of the proposed development in terms of land use and the release of the site from its industrial designation;
 - Affordable housing;
 - Design, layout, heritage assets and tall buildings including views;
 - Public realm, landscaping and trees;
 - Housing mix including wheelchair housing;
 - Quality of residential and student accommodation;
 - Density;
 - Impact of proposed development on amenity of adjoining occupiers and surrounding area;
 - Transport;
 - Noise and vibration;
 - Sustainable development implications;
 - Ecology;
 - Air quality;
 - Wind microclimate;
 - Equalities and human rights;
 - 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 in the overall assessment at the end of the report.

EQUALITIES

30. The Equality Act (2010) provides protection from discrimination for the following protected characteristics: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership. Section 149 of the Equality Act 2010 places the Local Planning Authority under a legal duty to have due regard to the advancement of equality in the exercise of its powers, including planning powers. Officers have taken this into account in the assessment of this application and Members must be mindful of this duty, inter alia, when determining all planning applications. In particular Members must pay due regard to the need to:
 - Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act; and
 - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
 - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
31. As set out in the Essential Guide to the Public Sector Equality Duty (2014), “the duty is on the decision maker personally in terms of what he or she knew and took into account. A decision maker cannot be assumed to know what was in the minds of his or her officials giving advice on the decision”. A public authority must have sufficient evidence in which to base consideration of the impact of a decision.
32. There is a Travellers site approximately 900m to the north of the host property nearby to the South Bermondsey Station entrance. Given the separation distance it is considered that there would be no adverse impacts on the traveller’s site. There is a church to the south of the site but its operation would not be compromised by this development. There are no other groups with protected characteristics that would be adversely affected by the development.

Other Equality Impacts

33. The Strategic Housing Market Assessment (SHMA) prepared on behalf of a number of South East London boroughs states that Southwark, together with Lewisham, has the most ethnically mixed population in the South East London sub-region. Compared to the population at large a very high proportion of Black households

(70%) are housed in the social/affordable rented sector. These groups could therefore stand to benefit from the proposed affordable housing, which would include social rented units. The provision of communal amenity spaces to be shared by different tenures would also contribute to the potential for increased social cohesion. This is a positive aspect of the scheme.

34. Proposed enhancements to the streetscene of Ilderton Road (Including the widening of the footpath) would prioritise the movement of pedestrians and promote “healthier, active lives” in accordance with draft Policy AAP 10 of the draft OKR AAP.
35. The proposed development would also generate additional opportunities for local employment. The proposed development would deliver 1,526 sqm (GIA) of light industrial and ancillary floor space at ground and first floor levels. This results in uplift from the previous 338 sqm of light industrial floorspace currently on site. Furthermore, 10% of the light industrial space will be provided for Affordable Workspace which can accommodate various types of light industrial opportunities on site.

Conclusion on Equality Impacts

36. The proposed development would not result in any adverse equality impacts in relation to the protected characteristics of religion or belief and race as a result of the re-provision and uplift of light industrial floor space on site along with the introduction of residential use. Notwithstanding that the development would result in a significant change to the site, Officers are satisfied that equality implications have been carefully considered throughout the planning process and that Members have sufficient information available to them to have due regard to the equality impacts of the proposal as required by Section 149 of the Equality Act 2010 in determining whether planning permission should be granted.
37. The proposed development would undoubtedly result in a significant change to the site. The public sector equality duty does not prevent change but it is important that the Council consider the acceptability of the change with a careful eye on the equality implications of that change given its duty under Section 149 of the Equality Act 2010. The Council’s duty is to have due regard to the objectives identified above when making its decision. In the present context, this means focusing carefully on how the proposed change would affect those with protected characteristics and ensuring that their interests are protected and equality objectives promoted as far as possible.

PRINCIPLE OF DEVELOPMENT IN TERMS OF LAND USE

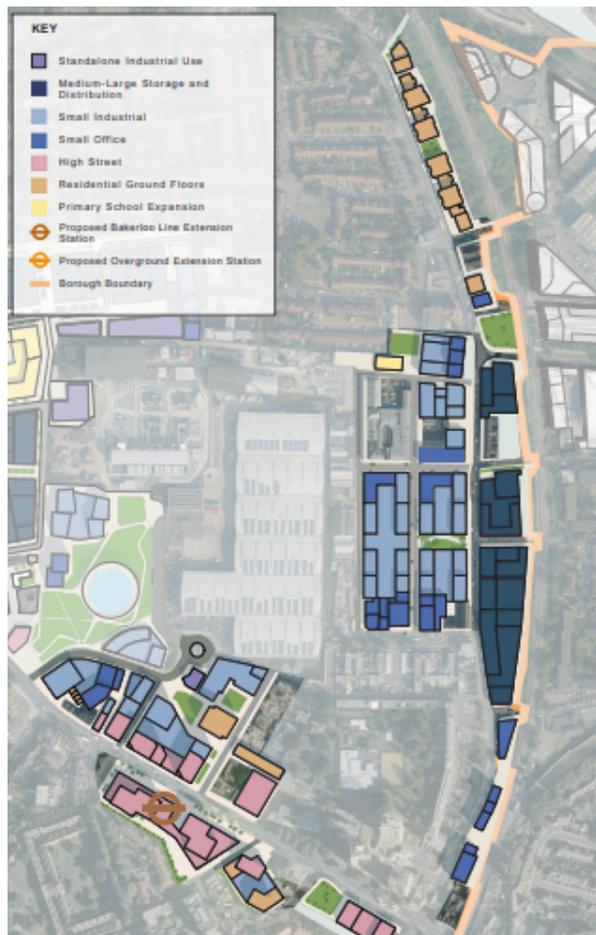
38. The NPPF (2019) offers a number of key principles that emphasise a focus on driving and supporting sustainable economic development to facilitate the delivery of new homes and commercial business units etc. The application site is located within the Old Kent Road Opportunity Area. In locations such as this, both London Plan and Southwark Plan policies strive for higher density, high quality mixed use developments which assist in addressing the need for new homes and ranges of employment opportunities.

39. In the draft OKR AAP, the site is identified as falling within Proposal Site OKR 16. The draft site allocation states that redevelopment on this site must:
- Replace existing industrial employment space and provide a range of employment spaces which is consistent with the building and land use types such as light industrial uses
 - The east side of Ilderton Road is suitable for industrial uses within mixed use developments that provides new homes
 - Provide on site servicing.
 - Improvement the surrounding environment and public realm to the benefit of walking and cycling
40. The existing uses on site are not considered to maximise the potential of this Opportunity Area Proposal Site. The proposed re-development of the site would provide an uplift of light industrial floorspace, the introduction of Affordable Workspace, and a mix of conventional residential units, and student accommodation on the upper floors. It is therefore considered that the scheme would deliver major regeneration benefits that are further discussed in the proceeding parts of this report.

Image: OKR Site Allocation OKR 16



Image: Typologies map of OKR 16



Industrial Land

41. The site is designated as Preferred Industrial Location-Strategic and Strategic Industrial Land (SIL) in current adopted Policy. It is noted that in view of policy changes at local level the Draft New Southwark Plan proposes the re-designation of the site as Locally Significant Industrial Site. Notwithstanding this acknowledgment, the application will be assessed against current adopted policy. Strategic Policy 10 of the Core Strategy states that SIL will be protected for industrial and warehousing uses. Saved Southwark Plan Policy 1.2 states that the only land uses that will be permitted in SIL are B class uses and other sui generis uses which would be inappropriate in residential areas. This proposal represents a departure from these policies by proposing residential use within SIL.
42. The Core Strategy does however also recognise that structural changes in the economy are resulting in a declining need for industrial land in London and that diversifying the range of job opportunities in industrial locations can be of benefit to local people. Furthermore, it also sets out the future direction of the Old Kent Road as a growth and regeneration action area, subject to a future area action plan (AAP).
43. Adopted London Plan (2017) Policy 2.17 seeks to promote, manage and where appropriate, protect SIL as London's main reservoir of industrial and related capacity, which includes general and light industrial uses. It states that developments on SIL should be refused unless they:

- Provide for broad industrial type activities;
 - Are part of a strategically co-ordinated process of SIL consolidation through an opportunity area planning framework;
 - Meet the needs of small to medium sized enterprises
44. The adopted London Plan (2017) also designates the Old Kent Road as an Opportunity Area, with an indicative capacity of 1,000 new jobs and a minimum of 2,500 new homes. This capacity has been increased to a minimum of 12,000 new homes in the emerging new London Plan. Both adopted and new London Plan identify the potential for residential-led development along the Old Kent Road corridor, with homes and jobs targets to be explored and further refined through the preparation of a planning framework and a review of the Old Kent Road SIL.
45. Furthermore, the draft OKR AAP sets targets of 20,000 new homes and 10,000 new jobs, to be supported by new infrastructure, including parks and schools. It proposes the release of a substantial part of the Strategic and local Preferred Industrial Location designation to allow for the creation of mixed use neighbourhoods where new and existing businesses would co-exist with new homes.
46. Paragraph 48 of the NPPF (2019) states that weight can be afforded to relevant policies in emerging plans depending on the stage of preparation of the plan. The New Southwark Plan and draft OKR AAP have been subject to extensive consultation however they have yet to be subject to independent examination and therefore the documents have limited weight. They do, however, provide an indication of the direction of travel for planning policy in the opportunity area.
47. Taking into account the adopted policy position, when determining whether the principle of the proposed development would be acceptable in land use terms, Members need to consider whether the wider regeneration benefits of the scheme would outweigh any harm caused by the loss of SIL and the introduction of a residential use into SIL, and whether those benefits would justify a departure from adopted planning policy.

Employment Re-provision (No Net Loss)

48. The proposed development provides 1786sqm of light industrial floorspace including outside yard space.. The proposed internal employment floorspace of 1,526sqm comprises an uplift of 1,188sqm of internal employment floorspace compared to the 338sqm existing.
49. The employment uses would be provided at ground and first floor in the form of workspace units and associated yard area capable of use by small to medium sized enterprises, start up and creative type businesses. The employment space has been designed to be flexible so that it could accommodate a range of different unit sizes and shared workspaces. The applicant has committed to managing the space themselves through their own established workspace management company. This will be secured through the S106 planning obligation.
50. The proposed commercial units fall within light industrial use. To meet the policy requirements and to improve the likelihood of light industrial occupiers leasing the

units, it is recommended that the internal fit out of the proposed light industrial units would be secured through condition and a clause in the Section 106 Agreement.

Image: Ground floor layout Core A

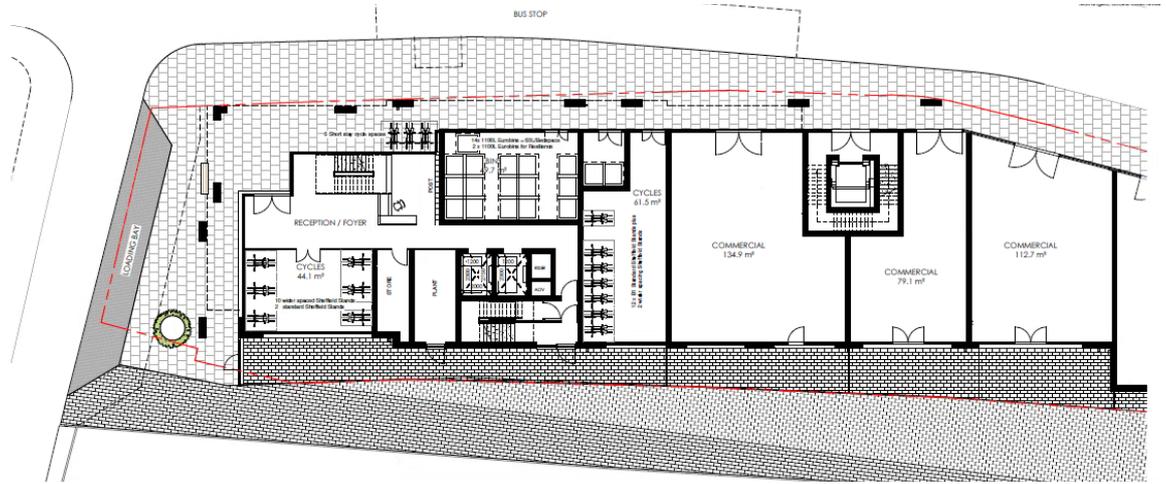


Image: Ground floor layout Core B

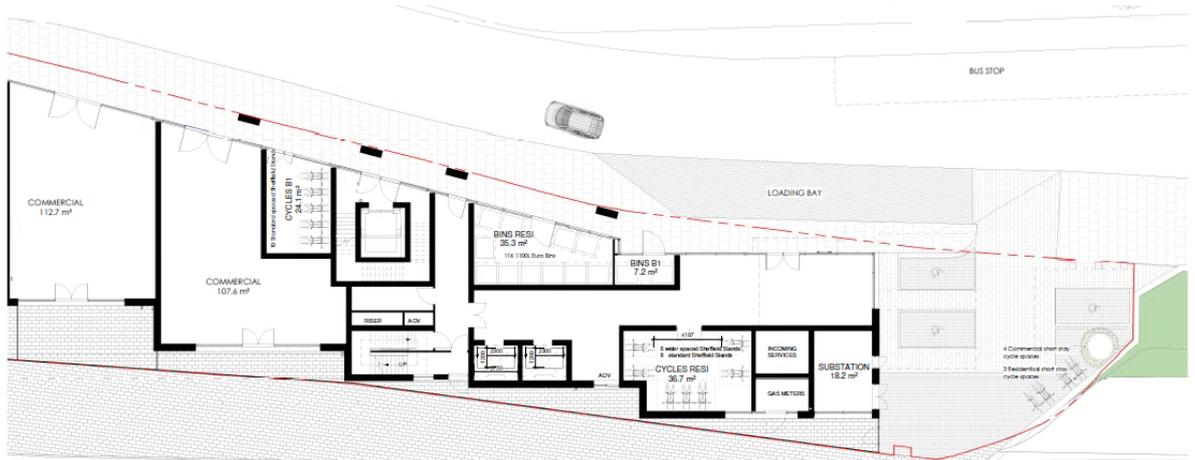


Image: Light Industrial floorspace viewed from Ilderton Road



Job Creation

51. The existing FTE employment levels on the site come to around 17 full time employees. The number of jobs generated within the proposed development has been calculated by applying the average job / floorspace ratio to the amount of floorspace proposed (1,526sqm). This implies that the development would be expected to create between 32-137 direct jobs (FTE). This figure is calculated by applying the 'Managed Workspace' range set out in the latest Employment Density Matrix published by the HCA. This is an uplift of 15 and 110 FTE jobs.

Affordable Workspace

52. Policy P28 (affordable workspace) includes a requirement for development proposing over 500sqm of employment space to include 10% of the proposed gross new employment floor space as affordable workspace on site. The affordable workspace should be secured for at least 30 years, respond to local demand and prioritise existing businesses. The applicant has agreed to provide an element of affordable workspace within the scheme comprising 10% of the commercial floorspace at rents of £12 per sq ft over a 15-year period. The rents would be subject to inflation over this time. The level of rent would make the space affordable to creative industries and businesses and ensure businesses that require low rents have the opportunity to lease space within the area.
53. Accordingly, the development has the potential to generate a significant uplift in employment provision on site. The new workspaces would meet the needs of the SME and emerging creative sectors. This is a positive aspect of the proposal. In addition to the direct operational employment, the retail, leisure and other expenditure of the residents of the proposed 58 dwelling units and 250 student bedspaces will support additional jobs in shops, restaurants and other services within the Old Kent Road area.

54. All training commitments would be secured through the Section 106 agreement. If any of these expectations were not to be achieved, financial contributions would be sought in accordance with the Council's Planning Obligations and CIL SPD. An Employment, Skills and Business Support Plan along with end user obligations would also be secured through the Section 106 Agreement.
55. To mitigate the loss of 335 sqm of the floorspace which would arise, a contribution of £2605 would be required towards skills and employment programmes in the borough, which in turn would help residents into employment. This has been calculated in accordance with the Council's Planning Obligations and CIL SPD and would be secured through the s106 agreement.

Relocation of existing businesses

The existing uses on site are as follows:

313-320 Ilderton Road

This part of the application site is currently in use as a tyre dealer's yard, Euro Tyres have a rolling lease and are working with Pedder commercial agents to secure their next move locally in south east London.

321-343 Ilderton Road

This site is currently occupied by, LDS, a leaflet distribution services business specialising in the distribution of advertising material across the UK. LDS have a rolling lease and are also working with Pedder commercial agents to secure their next move locally in south east London.

344-349 Ilderton Road

This part of the application site is currently in use as a builder's merchant yard. It is understood that the owner of Floyds Builders Merchants is willing to sell the site and is retiring.

56. Further details of the relocation and retention strategy will be secured by the legal agreement. Given the re-provision of flexible light industrial floorspace and significant uplift in the employment density, the proposed development is in accordance with London Plan Policy 4.1; draft London Plan Policy E5, Core Strategy Strategic Policy 10, Policy 1.2 of the Southwark Plan 2007, and Policy P26 of the emerging New Southwark Plan. Additionally, the development is also compliant with Policy AAP6 of the draft OKR AAP in providing a substantial contribution towards the target of 10,000 new jobs.

Assessment of Main Town Centre Uses

57. The subject site is designated within the New Southwark Plan (NSP) as being part of the Old Kent Road South District Town Centre. In acknowledging that the NSP is progressing to the Examination in Public (EiP) stage, the development would support the future aspirations of the Town Centre given that it would introduce new light industrial floorspace, student accommodation and housing within the new town

centre.

Provision of Housing, Including Affordable Housing

58. The scheme would deliver 58 new homes, of which 100% is affordable by habitable rooms. In addition to the residential component, 250 bed spaces are provided for student accommodation with 35% of the spaces being affordable. This is considered to be a significant positive aspect of the scheme. There is a pressing need for housing in the borough. Policy 3.3 of the London Plan supports the provision of a range of housing and sets the borough a target of 27,362 new homes between 2015 and 2025. This is reinforced through Strategic Policy 5 of the Core Strategy and emerging policy in the draft new London Plan, NSP and draft OKR AAP.

Delivery of Student Accommodation

59. Core Strategy strategic policy 8 seeks to allow development of student homes within town centres and places with good access to public transport and the New Southwark Local Plan continues with this ethos, supporting student housing but only in locations which are appropriate for this use and where it would not affect delivery of conventional housing. The application site has a PTAL of 4 and is located near a number of bus stops a 5-minute walk from site providing services to locations across central London including 24-hour services.
60. Student housing is considered as non self-contained accommodation and a 'sui generis' use in the Use Classes Order. Student housing is however considered as housing for monitoring purposes through the council's and the GLA's monitoring reports. The Core Strategy sets a target of providing at least 24,450 net new homes between 2011 and 2026. The London Plan (2016) sets Southwark a ten-year target of 27,362 homes between 2015 and 2025, i.e. a rate of 2,736 per year. It is noted that the draft New London Plan sets lower targets for the borough (of 23,550 over 10 years) compared with the adopted London Plan of 27,362 over ten years.
61. Supporting paragraph 4.1.9 of the draft New London Plan states that student housing contributes towards meeting a Borough's housing targets at a ratio of 2.5:1. As such, the proposed 250 student rooms will contribute the equivalent of 100 new residential dwellings towards Southwark's housing targets. Further, the draft New London Plan sets an overall strategic requirement for purpose built student accommodation of 3,500 bed spaces to be provided annually. The proposed student accommodation will therefore assist Southwark and London as a whole in meeting housing need targets as well as providing much needed accommodation for University of London.
62. The proposed student housing aspect of the development would not compromise the council's ability to meet its strategic housing targets set in the Core Strategy and London Plan, particularly as the scheme also provides 58 conventional residential units and student housing contributes towards the borough's housing targets.
63. There is support for student housing in the adopted Southwark policies, London Plan and Mayor of London's Housing SPG, and within the emerging OKR AAP, New Southwark Plan and draft London Plan. These policies are summarised below:

64. London Plan policy 3.18 'Education facilities' requires boroughs to support and maintain London's international reputation as a centre of excellence in higher education, and part b of policy 4.10 'New and emerging economic sectors' requires boroughs to "give strong support for London's higher and further education institutions and their developments, recognising their needs for accommodation". London Plan policy 3.8 'Housing choice' requires local planning authorities to identify the ranges of needs likely to arise within their areas and ensure that (h) "strategic and local requirements for student housing meeting a demonstrable need are addressed by working closely with stakeholders in higher and further education and without compromising capacity for conventional homes". The supporting text in paragraphs 3.52-3.53C set out further detail, including reference that there could be a requirement for some 20,000-31,000 student places over the ten years to 2025, but that "addressing these demands should not compromise capacity to meet the need for conventional dwellings". The supporting text also notes that Southwark is one of four central boroughs where 57% of provision for new student accommodation has been concentrated, reflecting the clustering of the HEIs in and around central London.
65. Mayor of London's Housing SPG in section 3.9 states that specialist student accommodation makes an essential contribution to the attractiveness of London as an academic centre of excellence.
66. Saved policy 4.7 of the Southwark Plan relates to non-self contained accommodation (including student accommodation), and states that it will normally be permitted where 1) the need for and suitability of the accommodation can be demonstrated; 2) its provision does not result in a significant loss of amenity to neighbouring occupiers; 3) there is adequate infrastructure in the area to support any increase in residents and; 4) a satisfactory standard of accommodation, amenities and facilities are provided.
67. These requirements of saved policy 4.7 link into the Residential Design Standards SPD, which sets out at section 4.3 sets out the further information required of a student housing scheme: "Student housing can be in the form of halls of residence, cluster flats or self contained units. To ensure that the appropriate levels of student accommodation are supplied in the borough without prejudicing the development of general needs housing, planning applications for student accommodation will have to be accompanied with evidence that there is an identified need for this type of housing, including:
- A letter from a recognised educational establishment
 - Confirmation that the accommodation will be affordable to the identified user group
 - Details of security arrangements
 - Details of the long-term management and maintenance arrangements of the student accommodation.
68. In terms of emerging policy, both the draft London Plan and draft New Southwark Plan have specific student housing policies.

69. Draft London Plan policy H15 'Purpose-built student accommodation' states in part A that boroughs should seek to ensure the local and strategic need for purpose-built student accommodation is addressed provided that; 1) the development contributes to a mixed and inclusive neighbourhood; 2) it is secured for students; 3) the majority of bedrooms and all affordable student accommodation is secured through a nomination agreement for occupation by students of one or more higher education providers; 4) the maximum level of accommodation is secured as affordable student accommodation and; 5) the accommodation provides adequate functional living space and layout. Part B of emerging policy H15 states that boroughs, student accommodation providers and higher education providers are encouraged to deliver student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes.
70. The supporting text for draft policy H15 states that purpose built student accommodation contributes to meeting London's overall housing need, and is not in addition to need. It requires 3,500 student bed spaces to be provided annually across London; this is a higher annual figure than the range of the adopted London Plan, suggesting that the need for student housing has increased since 2016. This strategic London-wide need has not been broken down into borough-level targets in the draft London Plan. To demonstrate there is a need for new student housing development; accommodation must be operated directly by an HEI or have an agreement in place with one or more HEIs to provide housing for its students (i.e. a nomination agreement).
71. The draft New Southwark Plan policy P5 states: "Development of purpose-built student housing must:
1. Provide 10% of student rooms as easily adaptable for occupation by wheelchair users; and
 2. When providing direct lets at market rent, provide 35% of the Gross Internal Area of the floor space as conventional affordable housing, as per policy P4, as a first priority. In addition to this, 27% of student rooms must be let at a rent that is affordable to students as defined by the Mayor of London; or
 3. When providing student rooms for nominated further and higher education institutions at affordable student rents as defined by the Mayor of London, provide 35% conventional affordable housing subject to viability, as per policy P4."
72. There is a need for more student accommodation across London which needs to be balanced with making sure Southwark has enough sites for other types of homes, including affordable and family housing. The affordable housing element of the current application is considered further in a separate section below.
73. The evidence base behind the NSP includes a background paper on student housing (dated December 2019). It refers to the council's Strategic Housing Market Assessment (SHMA) Update 2019 which found that over 21,000 students aged 20 or above live in the borough during term time, and 23,500 places at HEIs in Southwark. At least 50% of these students live in private rented accommodation, and 15% live with their parents. There are some 7,800 bed spaces in purpose built student

accommodation in the borough for London South Bank University, King's College, University of the Arts, and in independent halls of residence. The evidence base background paper also refers to the SHMA confirming an acute need for affordable homes in the borough of 2,077 net affordable homes annually, which is a significant increase from the 2014 SHMA of 799 affordable homes annually.

74. When assessing the principle of a student housing scheme, these policies require consideration of the need for student housing, the location of the proposal, and management of the student accommodation. Later sections of this report will consider the affordable housing, quality of accommodation and transport aspects of this proposal that are referred to in these policies as well.

Need for student housing

75. Policy 3.8 Housing Choice of the London Plan seeks to provide choice of accommodation for all Londoners including students. The Mayor encourages boroughs to ensure that strategic and local requirements for student housing meeting a demonstrable need are addressed by working closely with stakeholders in higher and further education and without compromising capacity for conventional homes.
76. The draft London Plan sets an overall strategic requirement for purpose built student accommodation of 3,500 bed spaces to be provided annually and Policy H17 Purpose- built student accommodation states that boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed.
77. There are several HEIs in the Borough, including London South Bank University, Kings College London, UAL and LSE with teaching facilities and student accommodation. There are a number of developments providing direct let student housing in the borough. All occupiers of the student residential accommodation within the application scheme will be students registered to attend University of London, as secured by nominations agreement. It would contribute towards to Southwark and London's stock of purpose built student accommodation.
78. The proposed student accommodation would assist Southwark Council and London as a whole in meeting housing need targets as well as providing much needed accommodation for students at the University of London. In this respect, the application addresses London Plan policy 3.8 and draft London Plan policy H17.

Management

79. A Student Housing Management Plan has been provided to address the two requirements of the Residential Design Standards SPD. The proposed development would be direct let by University of London and managed by Tribe. There will be a manned reception desk and security 24/7, 365 days a year.
80. In conclusion, the student housing aspect of the development would be in compliance with national, strategic and local policies and guidance. It delivers 250 student bed spaces, of which 88 are affordable, in a highly accessible location close to public transport, shops and services.

Prematurity

81. Legal Advice received in relation to this issue highlights the following from the National Planning Policy Guidance:
82. “arguments that an application is premature are unlikely to justify a refusal of planning permission other than where it is clear that the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, taking the policies in the Framework and any other material considerations into account. Such circumstances are likely, but not exclusively, to be limited to situations where both:
 - a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging Local Plan or neighbourhood planning; and
 - b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.
83. 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.”
84. The most up to date adopted development plan document pertinent to the Old Kent Road is the 2016 London Plan. This identifies the Old Kent Road Opportunity Area as having significant potential for housing led growth. The draft OKR AAP has been developed in response to this adopted plan and has also sought to address the emerging policy position of the draft New London Plan including the increased housing target for the opportunity area and the need to ensure that the draft New London Plan aspirations for industrial land and employment are addressed. The scheme under consideration here is not considered to undermine either the strategic or local plan making process, and reflects the adopted statutory development plan position of the 2016 London Plan and the direction of travel of the draft NSP and the 2016 and 2017 draft OKR AAPs and the 2018 draft New London Plan (including changes proposed by the Secretary of State in 2020). It is not therefore considered to be premature.

Conclusion on Land Use

85. The scheme would deliver major regeneration benefits, including a significant contribution to the borough’s housing stock, a policy compliant level of affordable housing, affordable student accommodation, job creation, high quality light industrial floorspace and affordable workspace. In light of the above, it is considered that the development, in land use terms, is acceptable, and its contribution to Ilderton Road and surrounding area should be supported.

AFFORDABLE HOUSING AND DEVELOPMENT VIABILITY

Conventional Affordable Housing

86. In summary, 58 conventional dwellings would be provided in the development, all located within Block A. The development would provide a total of 164 affordable habitable rooms which would equate to an overall affordable housing provision of 100%. The level of provision exceeds policy requirements and is therefore considered acceptable. Whilst the development meets the threshold to follow the Mayor's FastTrack Route, a Viability Assessment has been submitted in order to meet the local validation requirements.
87. Southwark Plan Saved Policy 4.4 requires at least 35% of all new housing to be provided as affordable housing. Of that 35%, there is a requirement for 50% social housing and 50% intermediate housing in the Old Kent Road Action Area. The adopted London Plan (2016) sets a strategic requirement of 60% social housing and 40% intermediate housing. Emerging New Southwark Plan Policy P1 sets a requirement for a minimum of 25% of all the housing to be provided as social rented and a minimum of 10% as intermediate housing.
88. The requirement for social housing set out in the New Southwark Plan is higher than the London Plan and the saved Southwark Plan policy given the acute need for social housing in Southwark. Approximately 57% of the borough's total affordable housing need is for intermediate housing to meet the housing needs of lower and middle income residents. However, the most acute affordable housing need is for social rented housing to meet the needs of homeless households living in unsuitable temporary accommodation such as bed and breakfasts or overcrowded conditions. Overcrowding is strongly related to poor physical and mental health and can strain family relationships. Children in overcrowded homes often achieve poorly at school and suffer disturbed sleep. Social rented housing is vital to social regeneration as it allows residents who cannot afford suitable market housing to remain close to their families, friends and employment. For this reason draft Policy P1 of the New Southwark Plan requires a minimum 25% of homes to be provided as social rented housing, which the proposed development complies with.
89. In accordance with the council's Affordable Housing SPD, rooms that are over 28 sqm 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.
90. Based on the minimum 35% policy requirement in accordance with Policy P1 of the emerging NSP, the scheme exceeds policy by providing 100% affordable housing. In addition, based on the 25:10 tenure split for a 35% policy compliant scheme. A total of 14 social rented units and 6 intermediate units would be required. The proposals exceed tenure split requirements in that 41 units are for social rent and 17 units are in the intermediate tenure.
91. All 58 affordable homes would be delivered in a mix of unit sizes within Core B of the development. The Section 106 Legal Agreement would secure the delivery of these

units. As with all Old Kent Road schemes, service charge costs to social rent tenants would be capped within social rent cap levels. This would be required in the Section 106 and confirmed when a registered social landlord is on board.

92. A contribution of £7,676.30 (a charge of £132.35 per affordable home) has been agreed towards affordable housing monitoring and maintained provision of these units, and would be secured by the legal agreement.

Affordable Student Accommodation

93. 87 of the 250 bed spaces will be affordable, equating to 35% provision by unit and habitable rooms. The affordable student lets will be provided at a rental cost for the academic year equal to or below 55% of the maximum income that a new full-time student studying in London and living away from home could receive from the Government's maintenance loan for living costs that same academic year, in accordance with Policy H15 of the draft New London Plan.
94. The affordable student accommodation offer is in accordance with Policy H15 of the draft New London Plan and Policy P5 of the emerging New Southwark Plan.

Development Viability

95. Southwark's Development Viability SPD requires a Financial Viability Appraisal (FVA) to be submitted for all planning applications which trigger a requirement to provide affordable housing. The FVA should identify the maximum level of affordable housing that can be sustained and justify any proposed departures from planning policy requirements.
96. This application is therefore accompanied by a FVA, which was reviewed by independent consultants on behalf of the Council. The findings from the Independent consultant's report indicate that the scheme would generate a deficit when benchmarked against the site value. The FVA analysis concludes that if student rental values grew by 2.50% and construction costs decreased by 5% the scheme generates a surplus of c. £0.31m when benchmarked against our site value of c. £1.86m. As the subject site is located near to the proposed Bakerloo Line extension, the development would benefit from the wider regeneration of the area. This would boost sales and thus the scheme would be likely to directly benefit from increases in residential pricing in the longer term. Therefore it is considered that the applicant's proposal of affordable housing contribution by habitable rooms is reasonable.

Conclusion on Affordable Housing and student housing

97. In conclusion, the level of affordable housing proposed at 100% for the conventional dwellings provided, and the equivalent of 35% of the overall scheme as required by NSP draft policy P5 and the provision of 35% of the student accommodation at affordable rent levels as defined by the draft New London Plan is a very positive aspect of the scheme. The offer is therefore considered deliverable on this basis and terms to secure the affordable housing and student housing would be included in the legal agreement, together with an early stage viability review should the scheme not be implemented within two years.

DESIGN CONSIDERATIONS

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

Site Layout

100. The proposed development building would have a clear, but subtly differentiated hierarchy of 'base', 'middle' and 'top', with different elevation details to separate the blocks into distinctive massings. This proposed expression ensures comfortable proportions and a clear articulation of the mix of uses proposed.
101. The 'base' of the building includes the ground and first floors that is defined by a continuous horizontal banding that splits the change in function from light industrial use to residential uses above. The high floor to ceiling heights creates a legible commercial frontage with opportunities for signage and activity along the length of the building. Regular rhythms of brick vertical columns meet the ground to create a colonnade with inset bays to Ilderton Road that enables wider footways and defensible space for the light industrial units.
102. The 'middle' would feature a clear rhythm of windows and balconies, with predominant vertical bands of brickwork interlaced with horizontal and vertical bays of dark grey rain cladding and glass balconies inset into the brickwork. The 'top' would be expressed with a mix of brick detailing and subservient pavilion style additions that are to be finished in dark grey rain cladding.

Image: Active frontages and public realm



Height Scale and Massing (including consideration of Tall Buildings)

Image: The development, viewed from the western side of Illerton Road

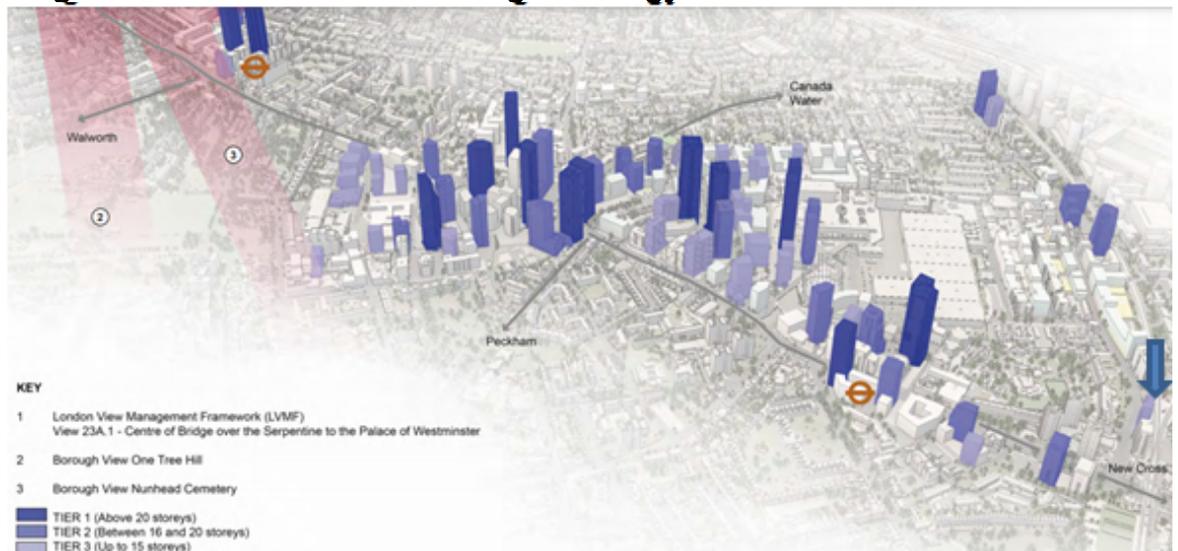


103. The height of the buildings proposed marks a significant change in the scale of development in the area, although not as tall as the towers on the adjacent Tustin Estate at circa 19 storeys, the height, scale and massing proposed is in line with the emerging policy set out in the draft OKR AAP. At its highest point, the development would be 56.100m high at the southern end of the site where the proposed building reaches 15 storeys. The building to the north reaches a height of 49.875m.

Draft OKR AAP

104. Policy 8 of the draft OKR AAP sets out a tall building strategy, the OKR ‘Stations and Crossings’ that should be adhered to in order to maximise the potential of the Old Kent Road. ‘Tier One’ buildings represent developments that exceed 20 storeys in height. These developments are proposed to be sited in the vicinity of the proposed BLE stations, to mark their city wide significance and optimise the use of land in the most accessible locations. A ‘Tier Two’ development proposes building heights within the range of 16 to 20 storeys. The strategic locations of Tier Two buildings located along important crossings and junctions of the Old Kent Road. The AAP states that tier 3 tall buildings will be up to 15 storeys and buildings in the area will vary in height from 8 to 14 storeys depending on their immediate context.
105. Outlined in the OKRAAP is a height strategy within each Sub-Area and Site Allocation. Within the subject site the heights of buildings are expected to be ‘Tier 3’ of no more than 15 storeys. The height of the buildings proposed marks a significant change in the scale of development in the area, although not as tall as the towers on the adjacent Tustin Estate at circa 19 storeys, the height, scale and massing proposed is in line with the emerging policy set out in the draft OKR AAP. At its highest point, the development would be 56.100m high at the southern end of the site where the proposed building reaches 15 storeys. The building to the north reaches a height of 49.875m. The proposed height is therefore broadly in line with the requirements of the OKRAAP.

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



***Site location identified by Blue arrow**

London Plan (2016)

106. As the development would be substantially taller than its existing surroundings, it would be defined as a tall building in the adopted London Plan (2016). Policy 7.7 of the 2016 London Plan, ‘Location and Design of Tall and Large Buildings’, states that tall buildings should be limited to sites in the Central Activity Zone, Opportunity Areas, areas of intensification or town centres that have good access to public transport. Furthermore, London Plan Policy 2.13 requires development in

Opportunity Areas to optimise residential and non residential output densities, meet or exceed minimum housing and employment guidelines and support wider regeneration objectives. Annexe 1 of the 2016 London Plan sets out the specific requirements for the Old Kent Road Opportunity Area, identifying it as having significant potential for residential- led redevelopment. As such, the Old Kent Road Opportunity Area is, in principle, an appropriate location for tall buildings which optimise housing delivery and regeneration benefits. The proposed development is considered to achieve both, whilst also meeting the other requirements of London Plan Policy 7.7.

107. National, Regional, and Local Policy state that the impact of tall buildings in sensitive locations, including the settings of conservation areas and listed buildings should be given particular consideration. In acknowledgement of the subject site not being within the boundaries of a conservation area, it is located immediately adjacent to the eastern edge of the Glengall Road Conservation Area. The specific impact of the proposed development on this sensitive setting, and the wider townscape context is assessed in more detail below where the submitted Townscape and Visual Impact Analysis (TVIA) is considered.
108. Ilderton Road is dominated by Industrial land and uses with limited active frontages and poor urban streetscapes. It is considered that the industrial nature of the existing townscape is not considered worthy of protection. The replacement of the industrial use with a high quality architectural mixed use scheme is a significant public benefit of the proposed development.
109. The uplift of existing light industrial floorspace and the introduction of light industrial Affordable workspace along with the delivery of both housing and student accommodation (including affordable housing), Children’s play space and amenity space is considered to deliver significant contributions to local regeneration. Furthermore, the improvements to the public realm would be appropriately landscaped, and would increase permeability when moving past the site.
110. The impact of the proposed development on microclimate, wind turbulence, overshadowing, noise, aviation, navigation and telecommunication interference is all assessed and presented elsewhere in this report. Please see the relevant section of this report for more detail.

Southwark Plan

111. As the most recently adopted document in the Local Plan, and the only document adopted after the Old Kent Road was designated as an Opportunity Area with significant potential for residential-led redevelopment, it is considered that these London Plan (2016) policies in relation to tall buildings are more relevant than Southwark Plan Saved Policy 3.20 dating from 2007. Nevertheless, the proposed development has also been assessed against the requirements of this saved policy. Saved Policy 3.20 requires any building over 30 metres tall to ensure that it:
 - Makes a positive contribution to the landscape; and
 - Is located at a point of landmark significance; and
 - Is of the highest architectural standard; and

- Relates well to its surroundings, particularly at street level; and
 - Contributes positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.
112. The footways along Ilderton Road are proposed to be widened which will create a comfortable setting for a building of this height, particularly where it is at its tallest, fronting onto Ilderton Road. A new piece of public open space of approximately 150sqm would be created adjacent to Wagner Street This piece of public realm would respond well to the activities planned for the ground floor of the proposed development. Its design would be secured by a landscaping condition.
113. The character of the area would not be adversely affected by the scale, mass or bulk of the tall buildings proposed. It is considered that the proposals would relate well to their surroundings, particularly at street level, with active frontages provided along Ilderton Road. The contribution that the scheme would make to local regeneration would be very significant in terms of mixed use development.
114. The form and massing approach is supported in the draft AAP and the shallow footprint of the site allows potential for elegant building forms in views from the south and north of the site. The massing would result in a well articulated composition that responds positively to the shape of the site, its existing context, and potential future development around the site. The two distinct blocks also help to break up the perception of massing along Ilderton Road, and allows for the podium level amenity space to receive good accessibility to natural light from the east and west. Given the above, the impact of the development on the skyline is considered to be acceptable.

Architectural Design and Materiality

115. The design proposed is of a high quality that responds well to the character of the surrounding context. The architectural language is primarily inspired by industrial buildings, resulting in an attractive, well proportioned building driven by the strong vertical columns and structural grid of the building. The windows would be a mix of aluminium windows, well in keeping with the aesthetic proposed. Windows of this nature are common in buildings around the application site. The rational, repetitive rhythm of the windows on each elevation, and the depth of the window reveals further contribute to the industrial aesthetic.

Image: Lower level appearance



Image: Upper level appearance



116. A brick language is proposed for the building in response to the character of the surrounding area. This would consist predominantly of dark brown and light cream/white brick elevations to create a separation between the elements of the massing, and interest with dark grey rainscreen cladding. Dark grey aluminium window frame, dark grey aluminium curtain walling to the light industrial units, and aluminium louvers matching the light industrial units curtain walling are proposed. The detailed design of all windows will be secured by condition, as will the fit of the light industrial units. The recessed and protruding balconies would be enclosed by glass balustrades.

117. These materials, along with the details described above are considered an appropriate response to the existing character of the area and the emerging architectural language proposed in the draft OKR AAP. Detailed drawings and

material samples will be required by condition in order to ensure that this quality of design is delivered.

Landscaping

118. A podium level over ground and first floors will provide outdoor communal amenity space separating the two blocks. Indicative landscape plans demonstrates that elements of hard and soft landscaping will be provided in the amenity areas. Additionally, landscaping proposals have been proposed within the public realm improvements along Ilderton Road. The Council's Urban Forester has reviewed the submitted details and raises no objection. Attached to this decision are condition details regarding hard and soft landscaping details that are to be submitted and agreed in writing by the LPA.

Image: View of proposed 11th floor communal terrace Block B



Image: Podium space



119. A preliminary ecological appraisal has been submitted and reviewed by the Council's Ecologist. The report is considered acceptable, and no further surveys are required. The Ecologist advises that the site has Japanese Knotweed present which will require a management plan and eradication with digging it out being the best and preferred option. The Ecologist is encouraged by the landscape plans including green infrastructure, and advises that the use of native trees and hedges should be proposed in light of the recommendations included in the submitted ecology report.
120. The assessment indicates that there would be no adverse impact to bats. Green roofs are proposed on which would provide some biodiversity and sustainability benefits and accordingly is welcomed, subject to condition. A condition is also proposed for the installation of 3 x nest boxes for house sparrows in the brick work on the East elevation of Core B and the South elevation of Core A.
121. The applicant is advised that as the subject site is adjacent to a borough Site of Importance for Nature and Conservation (SINC), it is advised that lighting used in the scheme should, where possible during the construction and operation phases of the development, be designed to avoid impacting on the railway embankments and bridges to the east of the site. This is advised by the Ecology Officer in order to minimise the disturbance to bats which may opportunistically use these linear features for commuting to foraging habitat in the wider area. Such lighting could include the installation of bollard lighting, use of warm-white LED lighting, directional installation of lighting, installation of recessed external lighting.

Trees

122. Saved Policy 3.13 of the Southwark Plan requires high quality and appropriately designed streetscape and landscape proposals.
123. There are no tree or landscape constraints on, or adjacent to the subject site. Given that the site currently contains no trees, the development would result in two new trees would be planted which represents a net gain in tree cover which is welcomed and supported. Along with the trees within the development, additional street trees are proposed in the public realm improvements to Ilderton Road which is to be secured in the S.278 Highways agreement. Where trees are proposed in planters and on terraces, sustainable irrigation is recommended. Given the proposed green infrastructure mentioned above, the development will achieve an Urban Greening Factor of 0.4. Details of tree planting are attached to this decision, and if the proposed trees are not provided on site during construction work, a payment in lieu will be sought through the S106 Agreement.

HERITAGE AND TOWNSCAPE CONSIDERATIONS

124. London Plan (2016) Policy 7.4, Local Character, states that development proposals should respond to their context, including buildings, open spaces, street patterns and the historic environment and Policy 7.8, Heritage Assets and Archaeology, seeks to record, maintain and protect London's heritage assets in order to utilise their potential within the community. It states that development should conserve the significance of any heritage asset it affects. Southwark Core Strategy Strategic

Policy 12, 'Design and Conservation', states that development should ensure that the significance of built heritage assets is conserved. Saved Policy 3.15, Conservation of the Historic Environment of the Southwark Plan (2007) states that development should preserve or enhance the special interest or historic character or appearance of buildings or areas of historical or architectural significance and Policy 3.18, Setting of Listed Buildings, Conservation Areas and World Heritage Sites states that the immediate or wider settings of designated heritage assets must be preserved. The NPPF (2019) requires Local Authorities to consider the impact of a proposed development on the significance of a designated heritage asset. Any harm to, or loss of, the significance of a designated heritage asset (including from development within its setting) should be categorised as either substantial or less than substantial. Substantial harm should only be permitted in exceptional circumstances. Less than substantial harm should be weighed against the public benefits of the proposal.

Conservation Areas

125. The subject site is not located within a conservation area, nor is it located near to a conservation area. Further to this, the subject site contains no listed buildings. The closest conservation area within Southwark is the Caroline Gardens Conservation Area located approximately 350 metres to the southwest of the subject site. The closest listed building is a semi-detached pair of buildings comprising of nos 864 and 866 Old Kent Road approximately 80 metres to the direct south of the subject site. It is considered that given the separation distance between the listed structures and the development, harm arising to the listed building would be less than substantial and significantly outweighed by the public benefits of the scheme.
126. It is noted that the Hatcham Conservation Area within the London borough of Lewisham is located circa 200 metres east of the subject site. It is considered that given the separation distance, no harm would occur to the conservation area.

Draft OKR APP and Draft Local List

127. Although of very limited weight, the draft OKR AAP also identifies buildings and features of townscape merit and buildings of architectural or historic interest. The closest buildings of townscape merit identified within the AAP are 881-887 Old Kent Road. These properties are located to the south of the site and are part two and part three storeys in height comprising of ground floor retail units and residential units above. No buildings of architectural or historic interest are located near to the development.

Townscape and Visual Impact Assessment (TVIA)

128. The submitted TVIA appraises viewpoints which demonstrate that whilst the proposed development will introduce substantial change to the Site and its locality, such change can be accommodated when considering the development without unacceptable effects on townscape character, and visual amenity of the wider landscape. Given the height of the development, four of the viewpoints are considered to be sensitive and are shown below with an individual assessment undertaken within each proposed viewpoint.

London View Management Framework (LVMF) Views

129. London Plan (2016) Policy 7.11, London View Management Framework, and Policy 7.12, Implementing the London View Management Framework, relate to the identified strategic views in London. They state that development should not harm these views, and where possible should make a positive contribution to the characteristics and composition of strategic views. Supplementary Planning Guidance on the LVMF was published in March 2012.
130. The LVMF view likely to be impacted upon by the proposed development is 6A.1 from Blackheath Point.

Blackheath Point (LVMF View 6A.1)	
View location	Panoramic north facing view from Blackheath Point
Heritage Significance	LVMF protected view. Panoramic view primarily concerned with St Paul's Cathedral, which is visible towards the centre of this image, to the left of the cluster of tall buildings in the City. The foreground of the view is largely occupied by low and medium scale development in Greenwich and Deptford. Further in the distance, post war towers near Old Kent Road are visible, including the Tustin Estate and Ledbury Estate towers. In the far background of the view, clusters of tall buildings at Vauxhall/ Nine Elms, Elephant and Castle, Blackfriars and London Bridge are evident.
Other Significance	Public Open Space
Sensitivity to change	High
Impact of proposal	The proposed development would be visible in the distance, on the left side of the panorama, well to the side of St. Paul's Cathedral. The proposed development would be seen to the left of the view, away from key landmarks, and would appear very similar in shape and size to the buildings currently seen in that part of the view including the towers comprising of the Tustin Estate.
HE Comments	None
Conclusion	The development site does not lie within the protected vista therefore no harm to the significance of this view would arise. The impact to this view is therefore considered to be negligible.

Borough Protected Views

131. Although of limited weight, the draft New Southwark Plan Policy P19, 'Borough

Views', states that development must positively enhance the borough views which have been identified. Five protected borough views have been designated and all have St Paul's Cathedral as the focal point, of which only VP01: One Tree Hill (London Panorama) and VP02: Nunhead Cemetery (Linear View) have the potential to be impacted by the Proposals. The draft policy states in both cases that development must "maintain the view of St. Paul's Cathedral from the viewpoint place", "not exceed the threshold height of the view's Landmark Viewing Corridor", and "not compromise the sensitive Wider Assessment Area that is located either side of the Landmark Viewing Corridor to ensure the viewer's ability to recognise and appreciate St. Paul's Cathedral and its setting". It also states that a canyon effect of the view of St. Paul's Cathedral must be avoided.

(Local View P19.1)	
View location	Panoramic north facing view from One Tree Hill
Heritage Significance	Protected borough view identified in the draft New Southwark Plan. St. Paul's Cathedral is visible to the east of the Shard with its profile almost entirely uninterrupted by development in its foreground (albeit slightly obscured by foliage in this summer view). The towers of central London, including the Shard and towers in the City of London, appear further west. A range of development in south London, including post-war towers, appears closer to the viewpoint, in the middle ground of the view.
Other Significance	Public Open Space
Sensitivity to change	High
Impact of proposal	The proposed development would be located well to the side of St. Paul's Cathedral and would be completely by the existing trees in this view.
HE Comments	None
GLA Comments	None
Conclusion	As the proposal is located away from the viewing corridor to the St Paul's Cathedral (to the left of the Cathedral), it would remain clearly visible. With this in mind, there would be no harm to its significance.

(Local View P19.2)	
View location	View of St. Pauls Cathedral from Nunhead Cemetery
Heritage Significance	Protected borough view identified in the draft New Southwark Plan. The view is towards St. Paul's Cathedral, with Highgate West Hill beyond it in the distance. The view is framed by trees, specifically maintained to ensure the view is visible. The dome and western towers of the Cathedral are seen clearly against a backdrop dominated by trees in this summer view. A variety of development is visible in the foreground of St. Paul's and the Guy's Hospital Cancer Centre near London Bridge, constructed in recent years, obscures a small part of the eastern end

	of the Cathedral.
Other Significance	Public open space and cemetery.
Sensitivity to change	High.
Impact of proposal	The proposed buildings would be located well to the side of St. Paul's Cathedral and would be completely obscured by trees from this viewing location.
HE Comments	None
GLA Comments	None
Conclusion	The proposed development would not be visible in this protected view and therefore would not cause any harm to its significance.

Local Views and the setting of heritage assets

132. The four viewpoints of the submitted TVIA considered in this report are from locations nearby that have been assessed due to their potential impacts on the nearby properties, heritage assets, and the character of the immediate area surrounding the subject site.

Viewpoint – Manor Grove	
View location	Looking south along Ilderton Road from Manor Grove
Heritage Significance	None
Other Significance	None
Sensitivity to change	High.
Impact of proposal	The existing view shows the current built form of the eastern side of Ilderton Road illustrating the industrial character on the eastern side. The right side of the photo demonstrates the residential character of the western side of Ilderton Road with the Grasmere Point Tower visible in the top right of the photo below. The proposed view is considered to result in a substantial change; however, the existing built form in the view will remain both the prominent and dominant visual features within the view.
HE Comments	None
Conclusion	With a low sensitivity and a high magnitude of change, the effect of the proposed development will be negligible.

Image: Manor Grove/Ilderton Road - existing view and proposed view:



Viewpoint – New Cross Road	
View location	Looking northwest along New Cross Road to development
Heritage Significance	Low – The illustrated image below shows the Grade II listed buildings consisting of nos. 5, 15, 17, 25, 29, 33, 35 and 37 New Cross Road. These properties are located in the Lewisham Borough in the foreground of the illustration
Other Significance	None
Sensitivity to change	Low
Impact of proposal	The development would be visible in the distance of

	the photo and would replace the current view of Ambleside Point, part of the Tustin Estate. The other two towers that form the Tustin Estate, Windermere Point and Grasmere Point would retain their visibility in this view.
HE Comments	None
Conclusion	The proposal development would add to the pattern of taller buildings being seen beyond the immediate streetscape, rising above the dwellings on the right side of the photo. With a low sensitivity and a medium magnitude of change, the effect of the proposed development will not be harmful.

Image: New Cross Road - proposed view



Viewpoint – Brimington Park	
View location	Looking north towards the development
Heritage Significance	Nos. 1-50 Clifton Terrace is Grade II Listed buildings in the foreground of the photo beyond the open space.
Other Significance	Open space of Brimington Park
Sensitivity to change	Low
Impact of proposal	The viewpoint is taken looking north towards the site. The foreground of the view is occupied by the open

	space of the park. Trees screen views beyond this extent. The Grade II listed buildings of Clifton Crescent appear on the northern side of the park and form a coherent townscape set-piece. The Tustin Estate residential towers are prominent in the background and the scheme is sited adjacent to the existing towers that are visible
HE Comments	None
Conclusion	The scheme is considered to be an improved appearance to current background of the view with the Tustin Estate. Notwithstanding this, there would still be a distinction between the foreground of the view Brimmington Park/Clifton Crescent, and the background of the view. With a low sensitivity and a medium magnitude of change, the effect of the proposed development will not be harmful.

Image: Brimmington Park - proposed view



Viewpoint – Old Kent Road near Gervase Street junction	
View location	Looking east along Old Kent Road to development
Heritage Significance	None
Other Significance	None
Sensitivity to change	Low

Impact of proposal	The majority of the development would be screened in views along Old Kent Road moving east by the existing Tustin Estate towers, and in the summer months by street trees along Old Kent Road. The outline of the development is illustrated in red within the image below.
HE Comments	None
Conclusion	With a low sensitivity and a low magnitude of change, the effect of the proposed development will be negligible.

Image: Old Kent Road junction with Gervase Street - proposed view



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

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

Table: Impact on heritage significance

Listed Buildings and Conservation Areas	Assessment of Impact on heritage significance
LVMF Views	No harm identified
Local Views	No harm identified
Caroline Gardens Conservation Area	No harm identified

Hatcham Conservation Area	No harm identified
Listed Buildings	No Harm identified given the separation distance and screening of development large mature trees along Old Kent Road.
Draft Locally listed buildings/ undesignated assets identified in the draft Old Kent Road AAP	No harm identified.

134. In conclusion, the proposed development would not have a significant impact on the views assessed despite it being a highly visible feature in the surrounding townscape. The development is considered to be an acceptable addition to the viewpoints assessed due to its high quality of design which generates new interest in the skyline within Southwark.
135. Historic England and the Greater London Authority raised no objection to any of the viewpoints assessed. As the development is considered to significantly improve the appearance of the subject site, creates active frontages along Ilderton Road and Wagner Street, and produces a design that successfully integrates a mix of industrial materiality to the visual amenity of the immediate area. It is therefore considered that the benefits of the scheme outweigh the limited harm from the proposed development to the surrounding area and its heritage assets.
136. Whilst limited weight has been given to emerging policy, full weight has been given to adopted policies, including the NPPF (2019), London Plan (2016) and Southwark Plan (2007) and Core Strategy (2012). As can be seen from the assessment contained within this report, the proposals are considered to be in compliance with these adopted policies.

HOUSING MIX, DENSITY AND RESIDENTIAL QUALITY

Housing Mix

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

Table: Proposed Housing Mix

Unit size	No. of homes	% of homes
Studio	0	0%

1 bed	22	38%
2 bed	24	41%
3 bed	12	21%
Total	58	100%

139. 62% of units would have two or more bedrooms; this exceeds the 60% target and is therefore acceptable. 21% of the units would have three or more bedrooms; this exceeds the 20% target and is therefore compliant with Strategic Policy 7. Six wheelchair units are proposed within the development all within the 2 bed social provision. This allocation equates to 10.34% of the overall units proposed and is therefore policy compliant. The breakdown below demonstrates that the housing mix within the development is acceptable.

Table: Proposed housing mix broken down by tenure

Unit size	Intermediate homes		Social rented homes	
	No.	%	No.	%
Studio	0	0%	0	0%
1 bed	0	0%	22	100%
2 bed	13	54.17%	11 (6 WCH)	45.83%
3 bed	4	33.33%	8	66.67%
Total	17		41	

Wheelchair Housing

140. Saved policy 4.3 of the Southwark Plan requires at least 10% of all major new residential developments to be suitable for wheelchair users and London Plan Policy 3.8 requires 90% of new housing to meet Building regulations M4(2) “accessible and adaptable” and 10% to meet Building Regulations M4 (3) “wheelchair user dwellings”. This is reiterated in emerging policy in the draft OKR AAP and the New Southwark Plan.
141. 6 of the 58 units are wheelchair accessible equating to just over 10% of the overall unit mix. Of the wheelchair units, all will be provided in the 2-bed dwellings. The wheelchair user dwellings would be secured through the Section 106 Legal Agreement.

Density

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

proposals should optimise housing output for different types of location within the relevant density range shown in Table 3.2 of the Plan. It also requires local context, the design principles and public transport capacity to be taken into account. Strategic Policy 5, Providing New Homes, of the Core Strategy sets out the density ranges that residential and mixed use developments would be expected to meet.

143. Residential density calculations are not directly applicable to student housing, and there are no policies relating to acceptable numbers of student rooms per hectare. Instead, the scale and amount of accommodation should be assessed in terms of its impact on neighbouring properties and the surrounding townscape, and the quality of accommodation proposed. The draft New London Plan establishes a ratio of 2.5 student bedrooms being considered the equivalent of 1 residential dwelling; when applying this ratio, the 250 student bedspaces equates to 100 dwellings.
144. Emerging Policy P9 of the New Southwark Plan seeks development within the Old Kent Road Opportunity Area (OKROA) Core to provide 650-1,100 habitable rooms per hectare. However, the OKROA allows development to exceed this range where it achieves exemplary standards of residential design. The development as a whole would have a density of 1,820 habitable rooms per hectare calculated in accordance with the Residential Design Standards SPD 2011.
145. Since the maximum upper limit of habitable rooms per hectare would be exceeded, the development would need to demonstrate that it would provide exemplary accommodation of the highest design standards. If it can be demonstrated that an excellent standard of accommodation would be provided, and the response to context and impact on local services and amenity to existing occupiers is acceptable, then a high density in this Opportunity Area location would not raise any issues to warrant withholding permission. This is considered in the following table and paragraphs.

Table: Indicators of exemplary design

Indicators of Exemplary Design	Proposal
Provide for bulk storage	All of the units would exceed the minimum requirements for storage.
Exceed minimum privacy distances	The distance between the rear windows of the development to the rear windows of Farrow Lane dwellings is at least 40m away. It is also noted that the railway track separates the host site and the dwellings on Farrow Lane. This significantly exceeding the minimum privacy distance of 21m.
Good Sunlight and daylight standards	The development has been designed to maximise daylight inside the dwellings and ensure good levels of sunlight to the external amenity spaces.
Exceed the minimum ceiling height of 2.5m	All Units within the development have a minimum

required by building regulations	floor to ceiling height of more than 2.5 metres
Exceed amenity space standards (both private and communal)	The private and communal amenity space standards are met. All three bed flats have balconies of at least 10 sqm and the required communal amenity spaces are provided on the podium level and the 11 th floor terrace of Block B.
Secured by Design Certification	The Met Police's Officers are satisfied that the development will meet the Secure by Design requirements. A condition is attached to this decision informing the applicant of the secure by design standards that are required to be adhered to.
No more the 5% studio flats	No studio flats are proposed as part of this scheme
Maximise the potential of the site	The existing site does not meet the potential that can be afforded within the site. The proposed development is considered to enable the site to maximise its potential incorporating the existing light industrial use into a mixed use scheme that is of a high quality design.
A minimum of 10% of units are suitable for wheelchair users	All of the proposed dwellings are designed to meet the wheelchair accessibility standards set out in M4(3), Accessible and Adaptable Dwellings. 10.34% of these dwellings would be easily adaptable to meet the needs of a wheelchair user.
Excellent accessibility within buildings	
Exceptional environmental performance	London Plan compliance with respect to improvement on Building Regulations Approved Document L.
Minimise noise nuisance between flats, through vertical stacking of similar room types	The proposed dwellings would be vertically stacked to minimise noise transfer. Wherever possible, living rooms would abut living rooms across party walls. The proposals would be designed to meet or exceed Building Regulations Part E - Resistance to the passage of sound.
Make a positive contribution to local context, character and communities	The proposal has been designed to contribute positively to the existing and emerging local character of the area. The use of high quality materials and simple, robust detailing will ensure the building stands the test of time. Furthermore, the creation of active frontages will improve the relationship between the building and the streetscenes of Ilderton Road and Wagner Street.

Include a predominance of dual aspect units	68% of the units (40 of 58) within the scheme are dual aspect. None of the single aspect units are north facing. All three bed units are dual aspect.
Have natural light and ventilation in all kitchens and bathrooms	Within the development, all of the kitchens are combined with the lounge and dining area to provide open plan units. All bathrooms would be internal. These would be provided with mechanical ventilation, a common approach to flatted development.
At least 60% of homes contain two or more bedrooms	62.07% of the proposed homes would have two or more bedrooms.
Significantly exceed minimum floor space standards	All dwellings meet or exceed the minimum space standards set out in Southwark's Residential Design Standards SPD, including extra floor space for wheelchair accessible units.
Minimise corridor lengths by having an increased number of cores	The lifts are located at the western end of each floor with no more than 6 cores per floor which enables the corridor lengths to be short.
No more than 8 units per core	The majority of residential floors have 6 units per core (2 nd -8 th floors) with the 11 th and 12 th floors providing 3 units per core, and the 9 th and 10 th floors providing 5 units per core
Achieve exemplary architectural design	The architectural design proposed for the buildings is of the exemplary standard.

Quality of Residential Accommodation

146. Saved Policy 4.2 of the Southwark Plan states that development should achieve good quality living conditions and include high standards of accessibility, privacy and outlook, natural light, ventilation, space, safety and security and protection from pollution. This policy is further reinforced by the Residential design Standards SPD 2011 (including 2015 Technical Update).

Unit Size

147. 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).
148. All of the proposed units would satisfy the minimum floor areas set out in Southwark's Residential Design Standards SPD, alongside good floor to ceiling heights and glazing. All kitchen units would be naturally ventilated and lit. Bathrooms

and toilets would be artificially lit and ventilated, but this isn't uncommon in flatted developments. Accordingly, this aspect of the development is therefore policy compliant.

Table: Proposed flat sizes

Unit Type	SPD Requirement (sqm)	Size range proposed (sqm)*
1 Bed 2 Person (flat)	50 sqm	50.3-53.3sqm
2 Bed 3 Person (flat)	61 sqm	61.7-65sqm
2 Bed 3 Person (WCH)	75 sqm	75sqm*
2 Bed 4 Person (flat)	70 sqm	70-72.9sqm
3 Bed 4 Person (Flat)	74 sqm	75sqm

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

149. Each unit type meets the minimum space standards as evidenced by the table above. All three bedroom units are provided with at least 10 sqm of private amenity space. The layouts of all flats are sufficient in not hindering movement and circulation, and all units are above minimum sqm standards for each respective size. The number of dual aspect units has been maximised across the development, with no north facing single aspect units. All units are also proposed to have large windows to ensure good levels of daylight and sunlight are achieved.
150. 68% of the proposed 58 residential units would be dual aspect. Single aspect units would all be west facing with no single aspect units facing the railway. All of the three bed units are dual aspect.
151. Overall, it is therefore considered that the flat sizes and layouts are acceptable, and would provide a good quality of accommodation.

Quality of Student Accommodation

152. Draft London Plan Policy H17 requires purpose built student accommodation to provide adequate functional living space and layout and emerging New Southwark Local Plan policy P24 requires the development of purpose built student housing to provide adequately sized bedrooms and functional indoor communal living space commensurate with the intended number of occupiers sharing the communal space.
153. The standards of residential design quality that are applied to conventional dwellings are not applied to student accommodation. Southwark Plan Saved Policy 4.7 does however require student housing developments to provide a satisfactory standard of accommodation, including shared facilities. Provision must be made within the development for adequate amenities and facilities to support the specific needs of

the occupiers, including staffing, servicing and management arrangements.

154. There are no specific housing standards for student housing and given the different needs and management of student housing in comparison to conventional housing, it is not appropriate to apply standard residential design standards to student housing. The scheme has been designed specifically to the requirements of the LSE and the proposed student accommodation will be well lit and ventilated with all habitable rooms having good levels of outlook and privacy. The bedrooms have been designed with an efficient and comfortable layout to provide sufficient space for a bed, desk and chair, and storage space for future occupants. A range of room types are proposed to suit a wide range of students.
155. The student accommodation element will provide 225 en-suite rooms, grouped in clusters with access to a communal kitchenette, and 25 studio flats. 5% (13 bedspaces) will be wheelchair accessible units, and whilst this falls short of the 10% requirement, a further 5% of the studios can be adaptable accessible units. It is considered that the quantum of wheelchair accessible units has been maximised given the site constraints and the proposed layout of the scheme, taking into account, the mix of uses provided. Furthermore, the Applicant has also liaised with the intended university occupier and the proposed quantum of wheelchair accessible units is considered sufficient.

Table: Proposed housing mix broken down by tenure

Unit size	Private Units		Nomination Units		Affordable Units	
	No.	%	No.	%	No.	%
En-Suite	106	84.13%	32	88.89%	74	84.09%
1 bed En-suite	7	5.55%	1	2.78%	5	5.68%
1 bed Studio	13	10.32%	3	8.33%	9	10.23%
Total	126	100%	36	100%	88	100%

156. In addition, students will benefit from indoor communal amenity space, comprising a common room and study spaces, and external communal amenity space located at first floor and on the 13th floor terrace.
157. It is considered that the proposed student accommodation would be of high quality accommodation with ample amount of functional living space as well as adequately sized bedrooms and shared communal living space, compliant with draft London Plan policy H17 and emerging New Southwark Local Plan policy P24.

Internal Daylight and Sunlight to Residential Units

158. A daylight and sunlight report and addendum based on the Building Research

Establishment (BRE) Guidance has been submitted which considers daylight to the proposed dwellings using the Average Daylight Factor (ADF). ADF is a measure of the overall amount of diffuse daylight within a room. It is the average of the daylight factors across the working plane within a room. This equates to the ratio of the average illuminance across the working plane, to the illuminance due to an unobstructed sky. ADF determines the natural internal light or daylit appearance of a room and the BRE guidance recommends an ADF of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens. This also adopts an ADF of 2% for shared open plan living room/kitchens/dining.

159. The assessment of daylight to the main habitable spaces within the proposed accommodation demonstrates that all the rooms tested achieve the recommended ADF value for their particular rooms use, the majority very comfortably. The analysis demonstrates that daylight amenity within the proposed residential accommodation will be very good and in full accordance with BRE guidance.

Overlooking and Privacy within the Proposed Development

160. There would be some potential for overlooking between habitable windows between Core A and Core B; however, they would be separated by the landscaped podium amenity space which is 19m wide. This degree separation is considered to avoid any harmful overlooking.

Conclusion on Quality of Accommodation

161. The proposed development would provide well lit and well ventilated homes that meet the space requirements of the Residential Design Standards. The quality of residential accommodation proposed is considered to be a great feature of the development, and the future occupiers will enjoy adequately sized units that do not impinge on circulation or movement. The addition of generous amenity and play space areas within the development further strengthens the overall quality of accommodation.

OUTDOOR AMENITY SPACE, PLAY SPACE AND PUBLIC OPEN SPACE

162. Saved Policy 3.11, Efficient Use of Land, of the Southwark Plan (2007) requires a “satisfactory standard of accommodation and amenity for future occupiers”. Saved Policy 4.2. Quality of Residential Accommodation requires that all residential development provide an adequate amount of useable outdoor amenity space, and that the nature and scale of the amenity space should be appropriate to the location of the development, and the character of the area.
163. Four categories of open space are required in major planning applications in the Old Kent Road Opportunity Area:
- Private amenity space (usually gardens, balconies and winter gardens);
 - Communal amenity space (usually courtyards, podium gardens or roof

- terraces);
- Children’s play space; and
- Public open space.

164. The requirements for private amenity space, communal amenity space and children’s play space are set out in adopted policy and the Residential Design Standards SPD. The requirement for public open space is specific to the Old Kent Road Opportunity Area and set out in the draft Old Kent Road Area Action Plan. The policy position on each is set out in turn below:

Private Outdoor Amenity Space

165. The supporting text to Strategic Policy 7, Family Homes, of the Core Strategy (2011) states that family housing must provide a minimum of 10sqm of private amenity space to ensure that children have somewhere safe to play. It also states that new developments must provide additional communal play areas for children, as required by the Mayor’s Supplementary Planning Guidance on Providing for Children and Young People’s Play and Informal Recreation (there is further detail on play space requirements below).

166. The private outdoor amenity space requirements are clarified further in the 2015 Technical Update to the Residential Design Standards SPD, as follows:

- Units containing three or more bedrooms should provide 10sqm of private amenity space; and
- Units containing two bedrooms or fewer should ideally provide 10sqm of private amenity space. Where this is not possible, any shortfall should be added to the communal amenity space requirement; and
- Private amenity spaces must be at least 3sqm in area.

167. The Residential Design SPD also states that a development is within an immediate proximity of a substantial area of public open space, accessibility to the open space, combined with better outlook, and may justify less amenity space as part of the development. In these circumstances a planning contribution may be required to provide improvements to off-site public amenity space.

168. In light of the above supplementary guidance, it is assumed that all units require 10 sqm of private amenity space; the total requirement would be 580 sqm (i.e. 58 units x 10 sqm). 15 of the units including all of the three bedroom units within the scheme either meet or exceed the 10sqm requirement. 34 units will provide between 7sqm and 10sqm, and 9 units provide between 5sqm and 7sqm. The total amount of private amenity space within the scheme is 507sqm which gives a shortfall of 73sqm from the requirement. This shortfall is to be provided in the communal amenity space in accordance with supplementary guidance.

Communal Amenity Space

169. In order to comply with the requirements of the Residential Design Standards SPD, 50sqm communal amenity space per development should be provided. This should

be provided in addition to the requirement to compensate for any shortfall in private amenity space.

170. The communal requirement comprises a minimum of 50sqm, plus the 73sqm shortfall from the private, which equals 123sqm. A total of 246sqm of communal amenity space is proposed at 2nd floor level podium and 11th floor level terrace of Block B which will be conditioned for detailed design. A total of 630sqm of amenity space is required for the scheme which includes the 50sqm communal amenity space. The proposed private amenity space combined with the proposed communal amenity space would deliver a total amenity space of 753sqm. This would exceed the total requirement plus the shortfall of 73sqm of private amenity space, and is therefore acceptable. The communal space will also be accessible for students.

Private and Communal Outdoor Amenity Space Calculations

171. The following table summarises the private and communal amenity space requirements, against that proposed. All the podium courtyard and terrace communal amenity and play spaces would be accessible to all residents.

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

Communal amenity space proposed	Proposal	Shortfall
(Shared roof or terrace space)	246sqm Required 73sqm + 50sqm = 123sqm	No shortfall

172. As demonstrated in the tables above, the provision of private and communal amenity space would meet and exceed the design guidance requirements.

Children’s Play Space

173. The supporting text to Strategic Policy 7, Family Homes, of the Core Strategy (2012) states that new developments must provide communal play areas for children, as required by the Mayor’s Supplementary Planning Guidance on Providing for Children and Young People’s Play and Informal Recreation. Policy 3.6 of the London Plan requires new developments to make provision for play areas based on the expected child population of the development. Children’s play areas should be provided at a rate of 10sqm per child bed space, covering a range of age groups. The updated GLA Child Play Space Calculator has been used in assessing this application.

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

the SPG, reproduced below.

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

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

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

- 175. The financial contributions required in line with the Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD (2015) would pay for ‘off-site’ provision, directly funding new and enhanced play equipment close to the site as part of a strategic approach. In this instance, they would go towards new or existing park spaces within the OKROA.
- 176. Using the GLA's latest Population Yield Calculator (v3.2) and assuming Inner London and a PTAL of 3/4, the scheme generates a total child yield of 35.7. In breaking down the child yield, a total of 357sqm should be provided for playspace within the scheme. In total 153sqm of play space is provided on site, representing a shortfall.
- 177. The playspace area would be provided at the podium level. Officers have advised the applicant that the play space areas should incorporate landscaped features amongst a variety of play equipment that would be suitable for both children and toddler play. This will also require the submission of detailed planting and screening, and a detailed drawing condition requiring designs of the landscape, including all play provision, will be secured by condition and will be subject to review by planning committee members before being determined.

Children’s Play Space Calculations

Table: Proposed areas of dedicated external play

Location	Area of dedicated play space
Podium level	153sqm

- 178. The following table summarises the policy requirements for children’s play space, against that proposed.

Table showing proposed external play space in the development, and shortfall

against policy requirements

Dedicated outdoor child play Space. This can be provided in either the communal or public open space but must be provided in addition to that space, rather than as a sub set of that space.	Required play space based on child yield.	Proposed play space	Shortfall
0-4 years old 5-11 years old Over 12	153sqm (157 sqm required) 0sqm (119sqm required) 0sqm (81 sqm required)	Play space proposed for children from ages 0-4 years located on the podium level	204sqm

179. In accordance with the Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD, any shortfall in the required amount of child play space will be charged at £151 per square metre. £151 per square metre is an average cost in Southwark for improving play space. Whilst it is acknowledged that there is adequate play space for children up to 4 years old, as there is no provision for the 5-11 and 12+ age groups there would be an overall shortfall in children's' playspace of 204sqm. Therefore this shortfall would generate a financial contribution of £30,804 in line the Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD (2015).

Public Open Space

180. The Old Kent Road Area Action Plan identifies within its masterplans which sites will contribute land to new public open space and which will not. Policy AAP10 of the draft OKR AAP requires the provision of 5sqm of public open space per proposed home. Any shortfall will be charged at £205 per square metre. As set out in the Section 106 and CIL SPD, £205 per sqm represents the average cost for improving open space in Southwark. Sites that aren't providing land for public open space as required in the AAP will still therefore make contributions to public space provision in the wider plan area through this charging mechanism.

181. The development is maximised on the parcel of land therefore no public open space is provided within the scheme. However, it is noted that 150sqm of public realm is to

be provided which encompasses the area that fronts onto Wagner Street.

Public Open Space Calculation

Table: Public open space proposed

Public Open Space	Draft OKR AAP (2017) requirement AAP 10: Parks, streets, open spaces –The Greener Belt. (Page 46) and sub area masterplan page 129.	Proposed public open space	Shortfall
	Provide 5sqm of public open space per dwelling. If the site is not identified as providing public open space on site, a financial contribution will be required. 290sqm required	No public open space proposed in AAP masterplan.	290sqm shortfall 290 x £205 = £59,450

182. As demonstrated in the table above, due to no public open space being proposed as part of the development there would be an overall shortfall of 290sqm, which would generate a financial contribution detailed in the table below. The payment of the financial contribution, which would be secured through the Section 106 Legal Agreement. The money would go towards the maintenance and improvements of public parks and spaces within the Old Kent Road Opportunity Area.

Overall contribution to Private, Communal, Play and Public Space

183. In total, as set out above, the shortfalls identified in children’s playspace and public open space would generate a financial contribution of £90,254 all of which would go directly towards improvements and maintenance of new and existing park spaces in the AAP area.

Sunlight Amenity Analysis within the Proposed Development

184. The location of the amenity areas on the second floor podium and eleventh floor terrace of Block B enables the development to benefit from excellent sunlight amenity. The location of the terrace amenity areas allows for the development to comply and exceed the recommended 2 hours of sunlight to amenity areas on the 21st of March.

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

185. In conclusion, given the density and site coverage of the scheme under

consideration, Officers are satisfied with the development achieving the space requirements for communal amenity with the shortfall from private amenity provided for the communal amenity aspect. Additionally, the scheme delivers the requirements for younger and older children's play space on site. The quality of the amenity and children's play space is a positive element of this scheme and is sufficiently planned to enable the space to not hinder or restrict circulation and movement for users of the development. The scheme is not identified as providing public open space in the AAP masterplan and so will be making a financial contribution in line with draft plan policy requirements. Officers have secured a financial sum as detailed above that is to be secured through the S106 Agreement. The landscape proposals are well thought through and of high quality, which is a positive aspect of the scheme. To ensure the spaces delivered are of the highest quality, detailed landscape design, including play space design will be secured by condition.

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

186. Strategic Policy 13 of the Core Strategy sets high environmental standards and requires developments to avoid amenity and environmental problems that affect how we enjoy the environment. Saved Policy 3.2 of the Southwark Plan states that planning permission for development will not be granted where it would cause a loss of amenity, including disturbance from noise, to present and future occupiers in the surrounding area or on the application site. Furthermore, there is a requirement in Saved Policy 3.1 to ensure that development proposals will not cause material adverse effects on the environment and quality of life.

Impact of the Proposed Uses

187. The retention of the existing light industrial use over the lower floor levels is considered to retain the compatibility of the site with the predominantly industrial character of Ilderton Road. The introduction of residential use and student accommodation to the upper floors is anticipated to provide a mixed use scheme that successfully integrates with the immediate area, and would not cause identifiable harm to the neighbouring occupiers. Accordingly the mix of uses within the scheme is considered acceptable.

Daylight and Sunlight Impacts

188. 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). As required by Regulations, the submitted assessment has been undertaken by competent, experienced, registered professionals.

BRE Daylight Tests

189. 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) and also in 'Lighting for Buildings Code of practice for daylighting (AMD 7391) BS 8206-2:1992' (BSI, 2008). The Building Research Establishment's (BRE) Site Layout Planning for Daylight and Sunlight, a guide to good practice (1) gives criteria and methods that are explained subsequently for calculating DSO effects on surrounding receptors as a result of the proposed development.

190. While the BRE benchmarks are widely used, these criteria should not be seen as an instrument of planning policy. As stated in the Introduction to the BRE Guidelines paragraph 1.6:

“The guide is intended for building designers and their clients, consultants and planning officials. The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design.”

191. The BRE guidelines provide two principal measures of daylight for assessing the impact on properties neighbouring a site, namely Vertical Sky Component (VSC) and No-Sky Line (NSL).
192. 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 advises 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.
193. NSL is a measure of the distribution of daylight within a room. It maps out the region within a room where light can penetrate directly from the sky, and therefore accounts for the size of and number of windows by simple geometry. The BRE suggests that the area of the working plane within a room that can receive direct skylight should not be reduced to less than 0.8 times its former value (i.e. the proportional reduction in area should not be greater than 20%).

BRE Sunlight Tests

194. When assessing sunlight, the BRE recommends that the Annual Probable Sunlight Hours (APSH) received at a given window in the proposed case should be at least 25% of the total available, including at least 5% in winter. Where the proposed values fall short of these, and the absolute loss is greater than 4%, then the proposed values should not be less than 0.8 times their previous value in each period (i.e. the proportional reductions should not be greater than 20%). The BRE guidelines state that ‘...all main living rooms of dwellings, and conservatories, should be checked if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are less important, although care should be taken not to block out too

much sun'. The APSH figures are calculated for each window, and where a room is served by more than one window the contribution of each is accounted for in the overall figures for the room. The acceptability criteria are applied to overall room based figures.

Overshadowing

195. Section 3.3 of the BRE guidelines describes the method of assessment of the availability of sunlight within garden/amenity spaces. This relates to the proportion of shading on March 21st. The BRE criteria for gardens or amenity areas are as follows, 'It is recommended that for it to appear adequately sunlit throughout the year, at least half of a garden or amenity space should receive at least two hours of sunlight on 21 March. If as a result of a new development an existing garden or amenity space does not meet the above, and the area which can receive two hours of sunlight on 21 March is less than 0.8 times its former value, then the loss of amenity is likely to be noticeable.'
196. Given the predominantly industrial character the eastern side of Ilderton Road, there are not too many neighbouring buildings that are in residential use. The daylight and sunlight impacts for the following buildings in residential use and therefore of high sensitivity to impacts are:
 - 7 to 21 Farrow Lane
 - 23-53 Farrow Lane (odd)
 - 899-915 Old Kent Road (odd)
 - 881-887 Old Kent Road (odd)
 - 28 Wagner Street
 - 871 Old Kent Road
 - 1 to 73 Windermere Point
 - 1 to 72 Grasmere Point
 - 1 to 72 Ambleside Point
 - 1 to 20 Heversham House
 - 21 to 84 Heversham House

Image: Plan demonstrating potentially affected neighbours located near to the application site

200. The daylight results demonstrate that whilst the first floor rooms experience larger reductions, proportional reductions to all the ground floor rooms in these properties fully accord with BRE guidance. While proportional reductions in VSC are between 20% and 27.18%, i.e. marginally in excess of BRE guidance, retained values remain very good, particularly so for an urban location. All windows will retain VSC values in excess of 23%, with the majority retaining values of over 25%. The overall reduction in daylight amenity to these properties is very limited
201. In terms of sunlighting, as none of the potentially impacted windows are orientated within 90 degrees of south, sunlight is not an issue.

29 – 53 Farrow Road (Odd)

202. These properties are flats located to the east of the site across the railway line in the London Borough of Lewisham. It is assumed that the 2 ground floor windows to each of these properties both serve the same room, and that the 2 first floor windows serve two separate rooms. It seems likely that the smaller first floor windows appear to serve bathrooms, and although figures were presented for these rooms, if this is indeed the case then they would in fact not be material for assessment.
203. The NSL daylight test demonstrates that whilst the first floor rooms experience larger reductions, proportional reductions to all the ground floor rooms in these properties fully accord with BRE guidance. Proportional reductions in VSC to the windows serving these properties are in the region of 26% to 37%. While these reductions are in excess of default BRE guidance, and consequently may be noticeable to the occupants, retained VSC values remain good. With the exception of window W4/40 which retains a VSC of 17.49%, all windows will retain a VSC in excess of 18% after development, with over 80% retaining a value in excess of 21%. The daylight amenity to all these properties will therefore remain good after development, and the impacts should be regarded as acceptable, particularly in the context of the urban location.
204. As none of the potentially impacted windows are orientated within 90 degrees of south, sunlight is not an issue.

899 - 915 Old Kent Road (Odd)

205. These properties are located to the south east of the site, across the railway line and Wagner Street. While there are retail units at ground floor, residential units are located above. The daylight and sunlight report submitted demonstrates that the reductions in daylight to all the windows and rooms in these properties fully accord with the BRE VSC and NSL criteria respectively. There will therefore not be a material reduction in daylight to these properties, and each will continue to retain good amenity after development.
206. In terms of sunlight, as the subject site is located to the north of these properties, sunlight is not an issue.

881 - 887 Old Kent Road (Odd)

207. These properties are located to the south of the site, behind 28 and 30 Wagner Street. The ground floor comprises of retail units with the residential units above. The daylight and sunlight report submitted demonstrates that the reductions in daylight to all the windows and rooms in these properties fully accord with the BRE VSC and NSL criteria respectively. There will therefore not be a material reduction in daylight to these properties, and each will continue to retain good amenity after development.
208. In terms of sunlight, as the subject site is located to the north of these properties, sunlight is not an issue.

28 Wagner Street

209. This property is located to the south of the site, across Wagner Street. The NSL results demonstrate that 3 of the 4 potentially impacted rooms in this property will experience reductions that are very marginally in excess of BRE guidance. One first floor room will experience a slightly larger reduction. Proportional reductions in VSC to the windows serving these properties are in the region of 40% to 45%. Whilst these reductions are in excess of default BRE guidance, and consequently may be noticeable to the occupants, retained VSC values remain good. All windows will retain a VSC between 18.4% and 22.23% after development. Daylight amenity to the property will therefore remain good after development the impact is considered acceptable, particularly in the context of the urban location. Of further note, the property will also receive improved amenity in terms of outlook, as it would front the new public open space on the northern side of Wagner Street.
210. As the subject site is located to the north of these properties, sunlight is not an issue.

871 Old Kent Road

211. This property is located to the south of the subject site and is in use as a bar and restaurant at ground floor level, with a flat at first floor level. It appears that there is one main habitable room, served by 2 windows, which could potentially be impacted by the proposal. From the assessment, the proportional reduction in VSC to window W7/321 is marginally in excess of guidance, the reduction to the main window serving the space, W6/321, is well within guidance. Retained VSC values to these windows are 25% and 30.7% respectively. This is an extremely good level of daylight irrespective of location. Additionally, regarding the NSL assessment, NSL, there will be no reduction in daylight to this property and it will continue to retain excellent amenity after development.
212. As the subject site is located to the north of these properties, sunlight is not an issue.

1 to 73 Windermere Point

213. This property is a 19 storey tower block of residential flats located to the west of the subject site across Ilderton Road and forms part of the Tustin Estate. The daylight assessment indicates that the reductions in VSC to the vast majority of windows serving these flats fully accord with BRE guidance. There are 10 windows that will experience slightly larger reductions. 7 of these are small, secondary windows to the

rooms they serve, with the primary windows very comfortably achieving guidance. The overall effect on the daylight amenity to these rooms is therefore very limited.

214. The remaining 3 windows (W6/351, W9/352 and W9/353) are located under balconies that restrict their accesses to direct skylight. In situations such as this the BRE suggest that another calculation is carried out with the obstruction overhead removed. If the proportional reduction is in excess of guidance with the balcony in place, but achieves guidance with it removed, this demonstrates that it is the presence of the balcony, rather than the size of the new obstruction, that is the main factor in the relative loss of light. Analysing the figures demonstrates that the figures, with the balconies in place the proportional reductions are marginally in excess of guidance. With the balcony effect removed the proportional reductions are well within guidance. The reductions here are therefore in full accordance with BRE guidance.
215. For the NSL test, none of the rooms experience any reduction. Overall, the reductions in daylight to these flats are small, and they will all continue to receive very good daylight amenity after development.
216. The APSH test shows that each flat fully accords with BRE guidance. The properties will continue to receive very good sunlight amenity after development.

1 to 72 Grasmere Point

217. This property is a residential tower block located to the west of the subject site across Ilderton Road and forms part of the Tustin Estate. The daylight tests demonstrate that daylight to all the windows and rooms in these properties fully accord with the BRE VSC and NSL criteria respectively. There will therefore be a very limited reduction in daylight to these properties, and each will continue to retain good amenity after development.
218. Reductions in APSH to these flats fully accord with BRE guidance. The properties will continue to receive very good sunlight amenity after development.

1 to 72 Ambleside Point

219. This property is a residential tower block located to the west of the subject site across Ilderton Road and forms part of the Tustin Estate. The daylight tests demonstrate that daylight to all the windows and rooms in these properties fully accord with the BRE VSC and NSL criteria respectively. There will therefore be a very limited reduction in daylight to these properties, and each will continue to retain good amenity after development.
220. The reductions in APSH to the vast majority of rooms within these flats fully accord with BRE guidance. There are 5 rooms that are below guidance. In four cases this is due to a small reduction in winter sunlight. This is not unusual in an urban location, for example, in midwinter the sun's maximum elevation is around 15 degrees above the horizon, and this is lower than a typical urban skyline. In each case the rooms will still receive over the recommended 25% of total APSH after development. One room (R3/412) also experiences a 24% change in APSH and retains a total of 24% APSH. The change only very marginally exceeds default guidance and the retained levels

are very good for this locality. The reductions in sunlight amenity to these flats are limited, and they will continue to receive very good levels of sunlight after development.

1 to 20 Heversham House

221. This block of flats is located to the west of the site across Ilderton Road. Daylight tests undertaken show that reductions to the 5 south facing windows assessed (W5/441, W5/442, W5/443, W5/444 and W5/445) are small and in full accordance within BRE guidance. Each will retain a VSC in excess of the default BRE target of 27% after development.
222. The remaining windows are all located under external walkways that restrict their access to direct skylight. In situations such as this the BRE suggest that another calculation is carried out with the overhead obstruction removed. If the proportional reduction is in excess of guidance with the overhead obstruction in place, but achieves guidance with it removed, this demonstrates that it is the presence of the balcony, rather than the size of the new obstruction, that is the main factor in the relative loss of light. Considering the VSC figures with the walkway effect removed reductions to all windows at second floor level and above accord with guidance. The proportional reduction to the 1st floor windows are marginally in excess of guidance. The retained VSC values with the walkway effect removed (i.e. the level of daylight reaching the façade of the building) are all in excess of 21.7%. This is a good level of daylight, particularly so for an urban location. Overall the impact on daylight is limited.
223. The NSL test provided indicates that none of the rooms will experience any reduction. Overall, reductions in daylight amenity to this property are small and accord with BRE guidance.
224. Regarding sunlight impacts, the APSH test indicates that impacts to all windows are small and therefore in full accordance with guidance.

21 to 84 Heversham House

225. This block of flats is located to the west of the site across Ilderton Road. The NSL test shows that reductions to over 75% of the potentially impacted rooms are within BRE guidance. Proportional reductions to the remaining rooms are in the region of 20% to 35%. While these reductions are in excess of default BRE guidance, and consequently may be noticeable to the occupants, retained VSC values remain good.
226. Regarding the VSC test, VSC, many of the windows are recessed into the building and have their access to direct skylight restricted by walkways and overhanging massing above. Removing the effect of these walkways and overhangs in line with BRE guidance, reductions to over half of the windows fully accord with the guidelines. Proportional reductions to the remaining windows are in the region of 31% to 44%. Considering the retained VSC values with the walkway and overhang effect removed (i.e. the level of daylight reaching the façade of the building) are all in excess of 20%. This is a good level of daylight, particularly so for an urban location. It

is therefore considered that amenity to all these flats will therefore remain good after development, and the impacts should be regarded as acceptable, particularly in the context of the urban location.

227. In terms of ASPH results, the recessed windows will receive lower levels of sunlight; all the windows in the outer facade will continue to receive over double the recommended levels of sunlight (25% of total APSP, with at least 5% in winter) after development. Overall sunlight amenity to these properties will therefore remain very good after development.

Daylight and sunlight impacts to emerging residential development

228. There is an emerging mixed-use scheme on the eastern side of the railway viaduct at 1 White Post Street within the London Borough of Lewisham that was approved on 5th December 2018. Application Reference – DC/17/104772. The description for this development is:

The demolition of the existing structures at 1 White Post Street SE15 and redevelopment to provide a mixed use development comprising the construction of two buildings ranging from 3-7 storeys and refurbishment of the 6 railway arches (No's 62 - 67), providing 975 sqm of flexible commercial floorspace (A1/A2/B1/D1) and 25 residential units; together with the provision of associated plant, amenity space, 2 accessible car parking spaces and 56 cycle spaces.

229. An objection was received from the applicant for the 1 White Post Street scheme regarding the potential daylight and sunlight impacts to the proposed residential units on the previous scheme (ref. 17/AP/4819). The daylight sunlight assessment shows that all the rooms assessed will achieve the ADF target values for their principal room use, the majority very comfortably. Daylight amenity within both proposed developments will therefore remain very good after the application scheme is implemented.

Overshadowing impacts

230. The proposal will have some impact in terms of overshadowing to existing neighbours, however the level of overshadowing is considered not harmful to warrant refusal of the application. In terms of overlooking, the proposed scheme and properties are separated to an acceptable level commensurate to an urban context.

Daylight and sunlight conclusions

231. Whilst reductions in amenity to many of the properties assessed fully comply with the default BRE criteria, there will be noticeable impacts to some properties as set out above. However, in each case these are limited and considered to be reasonable in this context. The limited impact is regarded as acceptable.

Overlooking of Neighbouring Properties

232. 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. These distances are all met in terms of the impact of the proposal on adjacent buildings.

233. The subject site is approximately 25 metres away from 1-20 Heversham House and approximately a minimum of 35 metres away from 21-98 Heversham House on the Tustin Estate. The site is located circa 25 metres away from the emerging mixed use scheme at 1 White Post Street within the London Borough of Lewisham, and circa 15 metres from the properties at 28-30 Wagner Street. These degrees of separation when assessed with the orientation of the flats are considered to avoid any harmful overlooking.

TRANSPORT CONSIDERATIONS

234. The site is on Ilderton Road and lies along the western boundary of the South London Railway Line, northern edge of Wagner Street and approximately 75m north of the junction of Ilderton Road and Old Kent Road (A2). The site being located on the border between both LB Southwark and LB Lewisham, therefore subject to the adopted public highway for both boroughs.
235. PTAL rating for the site = 4. The site is less than 50m walk from the South Bermondsey station and will be in walking distance of the New Bermondsey Station in Lewisham due to be operational by 2026). The site is not within a Controlled Parking Zone (CPZ)
236. 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.
237. Southwark have recently adopted the Movement Plan, a people, place and experience approach to transport planning rather than modal one. This application has been assessed on how it will contribute to the 9 Missions.
238. The Mayors Transport Strategy (MTS) Mayors Transport Strategy (MTS) includes three strategic challenges that are of significant importance to assessing this application:
- Vision Zero
 - Healthy Streets
 - Air Quality
239. 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.

240. 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 will 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

241. The subject 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 Wagner Street. The site is vacant but was previously occupied by RS Joyner & Son who used the open yard space to store second hand lorries and vans. There is also a bus stop located directly in front of the site that serves Bus Route P12.

242. The kerbside is currently not controlled and utilised by various businesses to park vehicles which are often uninsured. This does not contribute to a pedestrian friendly environment. Wagner Street borders the site's southern boundary and runs between Ilderton Road to White Post Street in Lewisham. Wagner Street is often blocked by loading / unloading and holding goods vehicles. Along Hornsey Street to the north, there are double yellow lines at the priority junction with Ilderton Road and then unrestricted on street car parking. The rear of the site is bounded by the railway line.

Proposed Site Layout

243. The proposed future site layout will improve the pedestrian movement by wider footways. The proposed access arrangements and loading bays will be detailed up as part of the S278 agreement. The proposed new loading bay will be sited to ensure the P12 bus route will not be impeded.

244. There was a significant delay in the signing of the previous developments S106 related to an unusual request from TfL which Southwark as highway authority had issues. The request was for additional clauses to be added to the S106 because although Southwark is the highway authority the TfL red route traffic authority extends to the junction of Wagner Street. Southwark felt that that was unnecessary because they already have a legal obligation to consult Transport for London on any proposals that impact on both their role as traffic authority and on the bus network. Southwark Highways would normally include any requirements for impacts on this within the S278 consultations. In that instance we agreed to ensure the S278 bond made a provision for £30,000 for any TfL directly related works. This arrangement will now apply to this application.

245. All works within the extent of the S278 for Southwark will be done in accordance with Southwark Street Design Manual SSDM and TfL's Healthy Streets design guidance.

A Condition requirement for the detailed design of the landscaping and public realm will ensure secure by design and road safety is fully considered.

246. Highway layout takes into account the proposed LB Southwark cycle route on the western side of Ilderton Road, with minimum 6.4m carriageway width to accommodate two buses passing. The measures will be subject to detailed design as part of the S278 agreement and will include:
- Northern inset loading bay lengthened to maximise loading capacity
 - Southern inset loading bay removed
 - Bus stop moved further south, largely in the position of the existing stop with minimum 4.0m footway width in the vicinity of the shelter
 - Limited loading permitted in front of bus stop to accommodate refuse collection
 - No waiting/loading restrictions provided on the approach to the bus stop
 - One Way arrangement of Wagner Street shown (Proposed Lewisham/Southwark Scheme)
 - Loading bay provided on Wagner Street

Trip Generation

247. The existing site is used to store vehicles. But there is very little traffic arriving at and departing during the AM and PM peak hours. The proposed development is estimated to generate no more than 31 two way vehicle trips per day. This is less than previous uses.

Servicing and Delivery

248. The proposal includes provision of off street servicing from Ilderton Road. The council will also consider additional loading bays on Ilderton Road and Wagner Street the exact location of which will be agreed within the S278 agreement. The refuse collection will happen from Ilderton Road and the bin stores are located within 10ms of the kerb. This will be a maximum of 2 trips per week (recycling and general waste) and have no significant impact on the bus or other traffic in the area.
249. 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:
- (i) necessary to make the development acceptable in planning terms;
 - (ii) directly related to the development; and
 - (iii) fairly and reasonably related in scale and kind to the development.

250. The proposal is for the management of the new development to monitor the daily vehicular activity of the site both commercial and residential, quarterly for a period of 2 years from 75% occupancy. If the site meets or betters its own baseline target the bond will be returned within 6 months of the end of the monitoring period. If the site fails to meet its own baseline the bonded sum will be made available for the council to utilise for sustainable transport projects in the ward of the development. The council will retain £1,600.00 for assessing the quarterly monitoring. The bond in this instance would be £14,500.00 based on the 58 residential units, 250 student accommodation units and 1,526sqm of non-residential floor space. The applicant has agreed to the contribution which can be collected via the legal agreement.

Type	Quantum	Bond Amount
Residential	58	£5,800.00
Student Accommodation	250 (equivalent to 100 residential units)	£10,000.00
Non Residential	1526sqm	£400.00
Daily Trips	31	£14,500.00

251. As this application includes student accommodation we expect the delivery and service plan accompanying the bond to reflect the arrangements for student arrival and departures to demonstrate minimal impact on the highway and for residents and businesses in the area.

252. All uses in the development will be subject to a condition on the marketing and promotional material related to the work 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

253. The site is not located in a designated CPZ and there are sections of unrestricted on-street parking available in the immediate vicinity of the site. The on street parking survey carried out for the previously approved application is deemed valid as it was carried out within 3 years of the submission and currently due to COVID 19 surveys would not reflect regular activity. Wagner Street and the surrounding area has approximately 65 unrestricted parking spaces available and 13 spaces available on single yellow lines. The existing site was used to park freight vehicles which will not return.

254. The proposed development will be car-free however be three off-street parking spaces for Blue Badge holders as well as a loading bay will be 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 10m manoeuvring to enable exiting onto the public highway in forward gear.

255. An S106 Obligation that prevents future residents or occupiers of the proposed development from obtaining resident parking permits will be applied to this application. A further obligation to ensure all marketing of the development promotes car free living, to ensure the occupants are well aware they will not be entitled to

permits.

Public Transport

256. The site has convenient access to the P12 bus route a single decker 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 (information from the TA acquired summer 2018).
257. As a borough Southwark agrees with TfL that bus services will need to be increased in the area ahead of the BLE to accommodate the demand generated by additional homes and jobs generally in the Old Kent Road area in advance of the opening of the planned BLE which, subject to the granting of powers and availability of funding, would be 2029/2030 at the earliest. The requirement for TfL to provide evidence to prove both previous contributions 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 and the residential equivalent of student accommodation ($250/2.5 = 100$) and will be secured through the S106 Agreement.
258. Within the next ten years the area is likely to benefit from the Bakerloo Line Extension, this site will be in walking distance of both proposed new stations. On 4th December 2020 TfL received confirmation from the Department for Transport that they will safeguard the land along the A2 required to deliver the BLE.

Active Transport

Walking and public realm

259. The TA included an Active Travel survey carried out in March 2020. The proposal includes convenient pedestrian access points around the whole development. The building has been set back to allow the existing footway along the western boundary of the site to be widened as a part of the development proposals and this will benefit the pedestrian permeability throughout the local area. There are two bus stops within the vicinity of the site. The Old Kent Road is less than 100 m from the site providing access to further bus services and access to Brimington Park.

Cycling

260. Canal Road 210m north of the site Ilderton Road, forms part of Quietway 1 which links Greenwich in the east to Waterloo bridge. The quantum of cycle parking has been increased and redesigned to more closely accord with the Intend to Publish London Plan, LCDS and recent guidance from TfL.
261. The application provides cycle parking of 312 long stay and 14 short stay cycle parking spaces accessed by two cycle lifts one for each basement cycle store. This meets the requirements of the New Southwark Plan.
262. The S106 Agreement will include a contribution towards the delivery of a new Cycle

Hire Docking station of £50 per residential unit. TfL requested this and location will be need to be decided). There will be a condition attached to this decision regarding the detailed design of the proposed cycle parking spaces. Additionally, a detailed design including the lifts will be conditioned which will need to comply with London Cycle Design Standards (LCDS).

Construction

263. A Draft Construction Traffic Management Plan has been prepared as a standalone document to be submitted along with this application. The S106 Agreement will secure a detailed Construction Management Plan (CMP) 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

264. The proposal is supported because it reduces car dependency, which will contribute to the impacts of climate change and to the delivery of some of the Movement Plans 9 missions, in particular Vision Zero and Healthy Streets and allows for the emerging plans for the surrounding public highway to be facilitated, subject to the aforementioned S106 obligations and conditions within this section of the report.

ARCHAEOLOGY

265. The proposed development site is located within the 'Bermondsey Lake' Archaeological Priority Zone which is designed to protect the palaeoecological environment and prehistoric archaeology recovered from the shoreline and relict fills of the large late glacial Bermondsey Lake and the associated riverine geology and topology. Saved Policy 3.19 of the Southwark Plan (2007) requires that applications for development in APZs should be accompanied by an archaeological desk-based assessment (DBA) and an evaluation report.
266. An archaeological desk-based assessment has been submitted with the application, which has been reviewed by the council's Archaeologist. The general findings of the report are approved and pre-determination fieldwork is not required in this instance. A broadly negative evaluation has already taken place on the northern part, however, the projected line of the Roman road is along Wagner Street - so further targeted evaluation is required on the southern part of the site. As the proposal includes a basement in its design, a series of archaeological conditions are recommended in relation to securing a programme of archaeological evaluation, mitigation and reporting.

AVIATION

267. The National Air Traffic Safeguarding Office (NATS) have reviewed the proposed development and from a technical safeguarding aspect and have stated that it does not conflict with their safeguarding criteria. Accordingly, they have no objections to

the proposal.

TV AND RADIO SIGNALS

268. Arqiva own and operate the UK Terrestrial Television Broadcast network and supply the Freeview platform. They also own and operate 90% of the UK Radio Broadcast network, through which they broadcast the full range of BBC and commercial radio stations. In addition, many sites that they own or manage are shared by other operators, such as BT, the Mobile Network Operators, Airwave (Emergency Services Networks), roadside services and Central and Local Government departments and agencies.
269. Following a reply to a consultation letter from LBS, Arqiva have determined that the proposed development will not impact upon their radio transmission and broadcasting links and therefore raise no objection to the development.

ENVIRONMENTAL CONSIDERATIONS

Wind and Microclimate

270. A Wind and Microclimate analysis report has been produced by XCO2 dated March 2020. The analysis indicated that the proposed development is not likely to have a significant adverse impact on the wind conditions on site and in several areas has a beneficial effect. From the 42 receptors tested, 25 receptors correspond to improved wind conditions when compared to the intended use of the space, 9 receptors experience a negligible impact and 2 receptors experience a minor adverse effect. The remaining 6 receptors are located on amenity spaces within the proposed development and experience a moderate or major adverse impact.
271. Mitigation measures for amenity spaces such as improved landscaping elements surrounding these areas which will contribute to reducing the wind speeds and improving the conditions. Therefore, these receptors are expected to perform better in reality and would be suitable for their intended use. The landscaping condition that is attached to this decision will require the landscaping mitigation measures to be demonstrated and agreed in writing by the LPA to preserve the amenity of future occupiers using the space within the development.

Flood Risk and Water Resources

272. The application site is located within Flood Zone 3 of the River Thames which is tidally influenced at this location, although in an area shown to be benefiting from existing flood defences. Flood Zone 3 is classified as comprising land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%) or a 1 in 200 or greater annual probability of tidal flooding (>0.5%). Flood defences are indicated to be in good condition and afford the Site a standard of protection up to the 1 in 1000 year event.
273. The Environment Agency (EA) has reviewed the submitted Flood Risk Assessment

by Ardent (Ref: 2001120-02 dated April 2020) and has no objection to the proposed development. On the advice of the EA, recommendations attached to this decision should include conditions relating to Piling and a Surface Water Drainage Strategy. Regarding piling, given the height of the proposed structure, it is assumed that the existing foundations would not be substantial enough therefore a piling process is required.

274. The Council's Flood and Drainage Officers have also reviewed the submitted proposals, and support the inclusion of green roofs and further storage to meet a site discharge rate of 5 l/s for 1 year and 100-year return period critical storms plus a climate change allowance of 40%. Flood Risk Officers are satisfied with the information submitted and raise no objection to the development subject to conditions regarding a Basement Impact Assessment and Sustainable Drainage Systems (SUDS) being attached to the decision notice.

Ground Conditions and Contamination

275. The application is accompanied by two reports that have been reviewed by the Environmental Protection Team (EPT) and the EA. These documents are by Jomas: 'Geo-environmental Desk Study / Preliminary Risk Assessment' (ref.P1175J1208 v1.0 dated 29 September 2017) and 'Geo-environmental & Geotechnical Assessment Report' (ref.P1175J1208 v1.0 dated 06 December 2017).
276. The intrusive investigation revealed some elevated concentrations of lead and hydrocarbons in the ground. No significantly elevated concentrations of contaminants were reported in the groundwater samples. Both EPT and EA Officers raise no objection to the development subject to conditions being attached regarding a phase 2 intrusive investigation works.
277. The recommended conditions of EPT and EA Officers are included in the draft decision notice.

Air Quality

278. The subject site is located in the Southwark Air Quality Management Area which is designated for the potential exceedance of the annual mean nitrogen dioxide (NO₂) and daily mean PM₁₀ air quality objectives. Southwark Plan Policy 3.6, Air Quality, states that planning permission will not be granted for development that would "lead to a reduction in air quality." London Plan (2016) Policy 7.14 states that development proposals should minimise increased exposure to existing poor air quality and make provision to address local problems of air quality.
279. An Air Quality Assessment has been completed by Ardent Consulting (Ref: 2001120-05) dated April 2020. EPT Officers have reviewed the submission and advised that they will require the emissions during the construction phase to be controlled by measures contained within a Construction Management Plan. Such a plan should detail continuous monitoring for dust and noise. It is recommended that this plan be secured by condition. Notwithstanding this request, the proposed development will meet building and transport emission benchmarks in terms of air quality.

neutrality. As such, no mitigation measures are required to reduce these emissions.

Noise and Vibration

280. A Noise Impact Assessment has been undertaken by Ardent (ref: 2001120-03 April 2020). The assessment demonstrates That external sound levels should be reduced to as low a level as practicable in accordance with the principles of good acoustic design, and this can be achieved through the incorporation of robust glazing through the design process. In addition, the noise associated with the proposed commercial use, such as fixed plant and equipment should not exceed cumulative rating levels at the closest receptor of 35dB(A)eq during the day and 30dB(A)eq at night.
281. EPT Officers have reviewed the submitted report by Ardent and raise no objection to the development subject to a list of conditions that should be attached to the planning permission. EPT Officers advise that with respect to the dwellings hereby permitted within the overall development; these should be designed to ensure that internal noise levels are not exceeded due to environmental noise.
282. The recommended conditions are included in the draft decision notice.

SUSTAINABLE DEVELOPMENT IMPLICATIONS

Energy

283. 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. This involves the 'Be Lean', 'Be Clean', 'Be Green' hierarchy. Policies 5.5 and 5.6 require consideration of decentralised energy networks and policy 5.7 requires the use of on-site renewable technologies, where feasible. The residential aspect of the proposal would be expected to achieve zero carbon, and the commercial aspect a 35% reduction against part L of the Building Regulations 2010.
284. An Energy Statement and Strategy has been submitted based on the guidance of the National Planning Policy Framework (2019), The London Plan (2016) and Draft London Plan (2017), Southwark Core Strategy (2011), Southwark Sustainable Design and Construction Supplementary Planning Document (2015), and the Mayor's Energy Assessment Guidance.

Be Lean (use less energy)

285. The GLA draft version of the London Plan and the Policy SI2 Minimising greenhouse gas emissions state that residential developments should achieve 10% and non-residential developments should achieve 15% through energy efficiency measure alone. The development has a 5.8%, 5% and 2% improvement over Part L for the residential flats, student accommodation and commercial elements respectively. Whilst this falls short of the draft New London Plan requirements, it is considered the development design is efficient as possible given the site constraints and

incorporates energy efficient measures included in the strategy are passive design measures, high efficiency glazing and energy efficient lighting and a reduced air permeability rate.

Be Clean (supply energy efficiently)

286. A communal gas boiler is proposed for the development to reduce the carbon dioxide savings further. As part of the proposal, the building would be future-proofed for connection to a future district heating system which would be secured through the S106 agreement.

Be Green (Low or Carbon Zero Energy)

287. A range of low or zero carbon technologies was considered and photo voltaic panels (PVs) were found to be most suitable for this scheme. The PVs proposed would reduce carbon emissions by 6%; this would not meet the 20% target for Strategic Policy 13 of the Core Strategy. It is noted that the development is constrained by its massing in what can be achieved. The roof area to overall floor area ration is very low as the buildings are narrow and tall. This significantly restricts the amount of PVs that can be installed on the roofs and reduces the overall carbon savings that can be achieved. Overall, the development has a 73.8%, 64.9% and 2% improvement over Part L for the residential flats, student accommodation and commercial elements respectively.
288. The figures above significantly exceed the 35% Intend to Publish London Plan requirement for the residential and student accommodation elements. Whilst the commercial element does not meet the Intend to Publish London Plan requirements, due to the residential and student accommodation elements exceeding the requirements so significantly it is considered the proposals are acceptable for the Be Green stage.
289. In acknowledging that both the residential and commercial aspects fall below the policy target of zero carbon, a contribution towards the council's carbon offset fund would be required. Calculated on the basis of £95 per tonne, the residential component would generate a contribution of £40,386.40, the student component would generate a contribution of £267,406.95 and the commercial component a contribution of £24,866.25. The applicant has agreed to make the contribution of £332,659.60 to the carbon off set fund which would therefore make this aspect of the scheme fully policy compliant.

Overheating

290. Policy 5.9 of the London Plan "Overheating and Cooling" states that major development proposals should reduce potential overheating and reliance on air conditioning systems and demonstrate this in accordance with the cooling hierarchy. This policy seeks to reduce the impact of the urban heat island effect.
291. An Overheating Report has been submitted by JAW Sustainability dated 15th April 2020. The assessment undertaken utilises IES Virtual Environment software, which is a CIBSE AM11 compliant thermal modelling software. The DSY1, DSY2 and

DSY3, London Heathrow, high emission, 50% percentile weather files were used to assess current overheating potential.

292. The results demonstrate that nearly all assessed units within the development pass the overheating assessment for the current DSY1 scenario, which is the weather file recommended. The results also show that the development consistently performs well against Criteria 1, which looks at extremely high internal temperatures. However, in more extreme heat, such as the DSY2 and DSY3 scenarios, the building struggles to meet the requirements of Criteria 2. A range of measures have been incorporated to reduce this as much as is feasible. Guidance will be provided to the occupants on measures that they can take to improve comfort, including when to keep windows closed to reduce ingress of hot air, use of boost function of MVHR units, use of blinds to control solar gain and reducing gains from people and equipment.

BREEAM

293. 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 a “Very Good” standard can be achieved. This does not meet the “Excellent” standard that is required for the commercial element. A pre-fit condition for the commercial workspace to secure an ‘Excellent’ standard is therefore recommended. A proposed light industrial fit out condition will assist this improvement.

PLANNING OBLIGATIONS (Section 106 Undertaking or Agreement)

294. 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

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

Table: Section 106 Financial Obligations

Planning Obligation	Mitigation
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Archaeology	£11,171
Affordable housing monitoring	£7,676.30 (58 affordable homes x £132.35)
Carbon Offset – Green Fund	£332,659.60 (Consisting of £40,386.40 for residential, £267,406.95 for student and £24,866.25 for commercial)
Delivery and Service Plan bond (Residential)	£5,800 (58 homes x £100) + The council will retain £1,600.00 for assessing the quarterly monitoring for 2 years
Contribution to existing and new public space in the AAP area.	Estimated cost: £90,254
Loss of Employment Space	£2,605
Transport for London Buses	£156,600 maximum capped contribution, to be drawn down according to TfL methodology review mechanism) (Maximum £2,700 per residential unit)
Transport for London cycle hire contribution	£2,900
Construction Management Contribution	£2,320 (£40 per residential unit)
Admin fee	2% for all cash contributions plus flat fee of £2,000 for costs incurred in transferring TfL buses contribution

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

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

- Triggers securing Practical Completion of workspace;
- 10% Affordable workspace – Available for 15 years minimum at £12 per sqft to the end user (subject to annual RPI increases);
- Affordable Workspace Management Plan, including marketing requirements;
- Construction phase jobs, short courses and apprenticeships or Employment and Training Contribution;
- Employment, Skills and Business Support Plan (Construction Phase);
- Retention of existing occupiers business plan
- Loss of employment floorspace
- Highways works – s278 works;
- Connection to a future district heating system (SELCHP);
- London Living Wage – best endeavours to being offered to all staff employed in the commercial units as well as workers during the construction period;
- Final Demolition and Construction Environment Management Plans;
- Final Delivery and Service Management Plan;
- Final Construction Logistics Management Plan;
- Local Procurement;
- Service charge costs to social rent tenants would be capped within social rent cap levels;
- Dockless cycle hire for 3 years or Brompton Lockers (10% of units)
- Car club membership for 3 years
- Parking permits exclusion zone for future occupiers
- Disabled parking restrictions
- Securing Alan Camp Architects to deliver the building detailed design, unless otherwise agreed in writing

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

298. In the event that a satisfactory legal agreement has not been entered into by 6th August 2021, it is recommended that the Director of Planning refuses planning permission, if appropriate, for the following reason:

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

S278 Works Outline

299. The Council's Highways Department raises no objection to the development. Highways Officers advise that the footways fronting the development on Ilderton Road and Wagner Street should be repaved with concrete paving slabs and 150mm wide silver grey granite kerbs as per SSDM requirements. Additionally, the development should widen the footway on Wagner Street fronting the development

to at least 2.0 metres. The development should also introduce a raised entry table at the junction of Ilderton Road and Wagner Street, on the Wagner Street arm, to slow down traffic. All of the above and more will be discussed and agreed the S278 negotiations between the applicant and the Southwark Highways Department.

300. An S278 agreement will need to undertaken with Southwark Highways for works to the highway, and traffic management changes. Notwithstanding the S278 with Southwark, the applicant is advised that a separate Section 278 Agreement would be required for the development with TfL.

Mayoral and Southwark Community Infrastructure Levy (CIL)

301. 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.
302. Based on the existing floor areas provided in the agent's CIL Form dated 01-May-20 and proposed areas in the Area Schedules (15-May-20), the gross amount of CIL is approximately £3,094,353.34, consisting £830,276.28 of Mayoral CIL and £2,264,077.06 of Borough CIL. If CIL relief procedures have been followed correctly after grant of planning permission, it is expected over £1,638,112.20 of Social Housing Relief might be claimed, of which £308,276.20 of MCIL2 relief and £1,329,836.00 of Borough CIL relief.
303. That is, the anticipated CIL receipt for this scheme is circa £1,456,241.14 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

304. None

CONCLUSION ON PLANNING ISSUES

305. The major redevelopment of the site is supported and delivers many of the key aspirations of the AAP. The mix of uses achieved is considered to be exemplary, successfully combining industrial and residential uses along with student accommodation in a carefully considered design led approach. The scheme would make a significant contribution to the councils housing and jobs targets in one of the boroughs major regeneration areas.
306. The re-provision of the existing Light Industrial floorspace on the lower floor levels

along with the introduction of Light Industrial Affordable Workspace is considered to be a major benefit of the scheme with the provision of 10% of the employment floorspace for Affordable Workspace is welcomed.

307. The proposed mix of uses would retain the existing industrial character of the eastern side of Ilderton Road whilst successfully introducing residential and student accommodation dorms uses into the area which would be complemented by 250sqm of public realm fronting Wagner Street. In addition, the design of the light industrial space creates multiple frontages that enable the street level of Ilderton Road and Wagner Street to be activated.
308. The scheme would deliver the following major regeneration benefits:
- 58 new residential units to the borough's housing stock;
 - 100% conventional affordable housing overall (71% social rented and 29% intermediate by unit and 66% and 34% by habitable rooms)
 - 250 student accommodation bed spaces at 35% affordable
 - The reprovision of the existing light industrial floorspace with the introduction of Affordable Workspace;
 - Significant uplift in full time equivalent jobs would be provided post development;
 - Generous provisions of door-step play for younger children and adequate space for older children play along with adequate communal amenity for residents to use and enjoy.
 - A contribution to new and existing parks within Old Kent Road Opportunity Area, with delivery mechanisms secured through the Section 106;
 - The site will benefit significantly from the planting of trees and landscaping features that are currently not available on site;
 - The proposed development results in a series of significant economic, social and environmental benefits that outweighs any potential and minor harm to the surrounding area that may be caused
309. The proposals would deliver a high standard of accommodation across both residential and student accommodation units, 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, and emerging London Plan Policies. No units would be single aspect and north facing, nor would any single aspect units front onto the railway line to the east of the site. Additionally, the three bed units as part of the social rent provision are dual aspect. Given the high density of the scheme this is considered to provide a high level quality of accommodation. Furthermore, all units have access to private amenity as well as communal amenity and play space located on the tenth and eleventh floors of the development.
310. The proposed development would reduce car dependency whilst significantly increasing cycle provision within the development. The enhancement of the footway on both Ilderton Road and Wagner Street with general improvements to the immediate public realm would make the visual amenity and pedestrian experience improved through comfort and circulation and ease when entering, visiting or passing along the site.

311. The impacts of the scheme on neighbouring properties in relation to daylight and sunlight would not result in detrimental harm to the living conditions of neighbouring occupiers.
312. The architectural design is considered to be of the highest quality and would significantly improve the site within the context of the surrounding area.
313. It is therefore recommended that planning permission be granted subject to conditions, referral to the Mayor of London, referral to the Secretary of State and the agreement of a Section 106 Legal Agreement under the terms as set out above.

STATEMENT OF COMMUNITY INVOLVEMENT

314. Following approval of the previous application (17/AP/4819), a revised scheme is sought on site to deliver industrial, residential and student accommodation uses. In light of the amended scheme, details of consultation undertaken by the applicant on the proposed development prior to submission of the planning application included Leaflets being sent to local businesses detailing the proposals with contact details and an offer to meet with residents and businesses to discuss the scheme. Information was supplied as a result of two requests. The applicant also met with Network Rail to discuss the scheme and extent of land ownership.

Consultations

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

Consultation Replies

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

SUMMARY OF CONSULTATION RESPONSES

317. This application was subject to a round of statutory consultation in June/July 2020.
318. At the time of writing, a total of four consultation responses had been received from members of the public and local businesses and organisations. Of the responses received, 2 were in support, 1 was neutral, and 1 comment objects to the scheme. The comments are summarised below:
319. **Support** - I support development of the site but my concerns are on the height of the structure and the loss of my view of Greenwich, Blackheath and Eltham Palace. The pavement at Ilderton Road expanding also results in loss of on-street car parking.
320. **Support** - If the project will create more spaces and accommodation, as well as create jobs for local people, I am willing to support. The only issue is how the present residents will be re-accommodated.

321. **Neutral** – Please can this large development include biodiverse green roofs and swift nest boxes to enhance the local environment, by making the buildings more attractive for people and wildlife.
322. **Objection** – The scale of the proposal is not in keeping with the scale of the properties and no provision of green landscaping or trees to provide screening. The development will block views, shade Ilderton Road and create a wind tunnel effect. The area is already highly polluted and development will only contribute to additional cars to local roads and more pollution. Insufficient public transport within the area and massive traffic problems. The area is a crime hotspot and the proposals provide no night-time or weekend passive surveillance.
323. Officer Response: The development is in keeping with the scale that was previously approved under planning reference 17/AP/4819. Landscaping has been well thought-out through the introduction of a podium level amenity area along with an eleventh floor terrace in Block B. Additionally, the scheme would provide significant improvements to the Wagner Street elevation with 150sqm of enhanced public realm proposed. The Transport issues section of this report has provided sufficient evidence that the development will be acceptable and the Metropolitan Police Service are encouraged by the proposals being able to achieve secure by design standards.

GLA

324. The GLA's Stage 1 response considers that the application does not comply with the London Plan and the new Draft London Plan. The reasons for this, and the Case Officers response, are set out below:
325. Given the site's location within Phase 1 of the Old Kent Road Area Action Plan and given the co-ordinate approach to the release of industrial land, through the New Southwark Plan and Old Kent Road AAP, the proposed land uses of conventional housing, student accommodation and re-provision and enhancement of industrial floorspace is appropriate in strategic planning terms
326. Officer response: Noted.
327. The proposed development would provide 100% conventional affordable housing, with a tenure split of 65% social rent and 35% intermediate by hab room (71:29 by unit) and 35% student accommodation. The application qualifies for the Fast Track Route, subject to an early stage review.
328. Officer response: The scheme would provide 100% conventional affordable housing of which 41 are social rent and 17 are intermediate; this exceeds emerging New Southwark Plan Policy P1 requirements and is therefore considered acceptable.
329. Urban design is generally supported, with elegant building forms in views from the south and north of the site and general high residential quality. Some revisions to the proposed highway layout are required however

330. Officer response: Revisions to highways were submitted by the applicant in July 2020.
331. Matters relating to cycle and disabled persons parking, servicing, highway works and student move in/out must be addressed. A contribution towards bus capacity, in line with the agreed tariff, will be required.
332. Officer response: Details on cycle parking, disabled persons parking, servicing and highway works will be secured by condition. Details in relation to the student move in/out arrangements are included within the submitted Student Housing Management Plan. A contribution towards bus capacity will be secured via S106.

TfL

333. A concern was raised regarding the pedestrian environment fronting Ilderton Road and the introduction of the bus layby.
334. Officer Response: The council agrees that the bus stops on Ilderton Road will need to be reviewed in light of the regeneration in the area. The relocation of the bus stop, if a change is required post review, will be agreed through the S278 and with TfL.
335. The proposed visitor cycle parking is situated in locations set back from the road and partially hidden (to the north by a car parking space, to the south by building columns). These should be relocated to make them more prominent and increase the level of natural surveillance, thereby reducing the risk of theft or tampering
336. Officer Response: Detailed cycle parking and landscaping will be subject to condition
337. A financial contribution of £26,000 (£200 per unit) for cycle hire was requested.
338. Officer Response: Officers have worked with the developer on this and have recommended either Dockless cycle hire for 3 years or Brompton lockers (10% of units) to provide a convenient in house cycle hire facility with at least two lockers providing EV charging. This will allow residents and workers of the site to access convenient cycle hire using a quality model of bike that can be flexible in use.
339. Car- free development supported. Room for disabled parking expansion.
340. Officer Response: Due to site constraints and other policy requirements this is not possible. However council will condition that the disabled bays will not be able to be reallocated to private households.

London Underground

341. No comments to make on the application.

Metropolitan Police

342. The Designing Out Crime Officer has advised that the development can attain secure

by design accreditation. The Met Officer has recommended a condition be attached regarding the need for the development to attain secure by design accreditation.

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

Natural England

344. No comments to make on the application.

Environment Agency

345. No objection to the development subject to suitable conditions regarding phase 2 intrusive ground investigation. On the advice of the EA Officer this condition is attached to the decision notice.

Historic England (HE)

346. Historic England raises no objection to the scheme

Arqiva

347. Arqiva has considered whether this development is likely to have an adverse effect on our operations and have concluded that the development will not impact on any of our SHF or RBL links.

Thames Water

348. Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

349. A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths, private swimming pools and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, commercial swimming pools, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc may be required before the Company can give its consent. Applications should be made at <https://wholesale.thameswater.co.uk/Wholesale-services/Business-customers/Trade-effluent> or alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.

350. 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. No properties shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows to serve the development have been completed; or - a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development” The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

351. 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. Thames Water request that the following condition be added to any planning permission. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide ‘working near our assets’ to ensure your workings will be in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk.

352. The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local

underground water utility infrastructure. Please read our guide ‘working near our assets’ to ensure your workings will be in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email:developer.services@thameswater.co.uk

353. Officer response: The recommended informatives and condition have been attached to this decision notice of this application.

Internal Consultees

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

Officer	Summary of comments	Officer response
Urban Forester	Suitable details of the roof terrace hard and soft landscaping have been provided.	Recommended conditions included in the decision notice
Local Economy Team (LET)	Subject to the employment and enterprise obligations outlined in this response, LET are happy to support this application which matches the economic, job, and growth plans as discussed in the planning statement. A contribution for the loss of employment space is to be agreed in the S106	Recommended contributions to be secured through the S106.
Environmental Protection Team (EPT)	Approve subject to conditions	Recommended conditions included in the decision notice.
Ecology Team	The Ecology PEA Report is fine. No further surveys are required. The site has Japanese Knotweed that will need to be removed, and conditions regarding swift bricks and landscaping to improve biodiversity net gain should be sought	Conditions attached to the decision notice.
Flood Risk and Drainage Team	The submission of the surface drainage strategy demonstrates that the discharge rate will be acceptable. Flood risk officers	Condition attached to decision notice

	therefore have no objection to the development subject to conditions.	
Transport	Approve subject to conditions and Section 106 clauses.	Recommended conditions included with this report, or as clauses in S106.
Highways	No objection subject to a conditions and applicant entering into S278 Agreement	Recommended conditions attached
Archaeology	Further Archaeological information is to be submitted before any work development is to take place on site including mitigation and evaluation reports	Recommended conditions attached

Community impact statement / Equalities Assessment

355. 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.
356. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.
357. The Council must not act in a way which is incompatible with rights contained within

the European Convention of Human Rights

358. The Council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application. This is addressed in detail in the relevant section of this report.

Relevant planning history

359. The subject site has been subject to the following planning history on site:

360. 12/AP/1936 Application type: Full Planning Application (FUL) - Construction of a new two storey building to accommodate replacement builders merchant shop (Use Class A1), office (Use Class B1) and storage (Use Class B8). Decision date 14/09/2012 Decision: Granted (GRA)

14/AP/0107 Application type: Approval of Details - Article 30 DMPO (AOD)
Details of a programme of archaeological evaluation works pursuant to Condition 4 of planning permission 12-AP-1936 for: Construction of a new two storey building to accommodate replacement builders merchant shop (Use Class A1), office (Use Class B1) and storage (Use Class B8).
Decision date 04/04/2014 Decision: Granted (GRA)

14/AP/2115 Application type: Approval of Details - Article 30 DMPO (AOD)
Details of a programme of archaeological evaluation works pursuant to Condition 4 of planning permission 12-AP-1936 for: Construction of a new two storey building to accommodate replacement builders merchant shop (Use Class A1), office (Use Class B1) and storage (Use Class B8).
Decision date 19/08/2014 Decision: Granted (GRA)

16/AP/0831 Application type: Full Planning Application (FUL)
Minor amendment to planning permission 12-AP-1936 for: 'Construction of a new two storey building to accommodate replacement builders merchant shop (Use Class A1), office (Use Class B1) and storage (Use Class B8)' to allow for additional storage above drive through and elevational alterations including the addition of a new roller shutter
Decision date 28/04/2016 Decision: Granted (GRA)

17/EQ/0114 Application type: Pre-Application Enquiry (ENQ)
Redevelopment of site to provide student accommodation (sui generis as 118 clusters and 230 studios), flexible workspace (405sqm) and cafe (103sqm) at ground floor in a building of 5-19 storeys, and ancillary accommodation comprising bin store, bikes store, student amenity space.
Decision date 12/04/2017 Decision: Pre-application enquiry closed (EQC)

17/EQ/0096 Application type: Pre-Application Enquiry (ENQ)
Construction of 1 x 10 storey and 1 x 20 storey mixed use buildings consisting of commercial and residential flats (122 units)
Decision date 10/05/2017 Decision: Pre-application enquiry closed (EQC)

17/AP/4819 Application type: Full Planning Application (FUL)

Full application for full planning permission for mixed use redevelopment comprising: Demolition of existing buildings and construction of two buildings on of part 11 and 13 storeys and one of part 13 and 15 storeys to provide 1,661sqm (GIA) of commercial floorspace (use class B1) at part basement, ground and first floors, 130 residential dwellings above (44 x 1 bed, 59 x 2 bed and 27 x 3 bed), with associated access and highway works, amenity areas, cycle, disabled and commercial car parking and refuse/recycling stores
Decision date 04/12/2018 Decision: Planning permission granted subject to legal agreement.

Pre Application Advice

361. A number of pre-application discussions were held on previous schemes and in relation to the current scheme now under consideration, the details of which are held electronically by the Local Planning Authority. The main matters discussed focused on the layout of the site, employment uses, affordable housing, building heights and massing, and servicing.

Planning History of Adjoining Sites

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

363. 18/AP/0564 16 Peckham Park Road and 1 Livesey Place

Application type: FULL

Demolition of existing buildings and construction of a part three, part four storey building with retail and warehouse (A1) use on the ground floor and 5 residential units (3 x 2-bedroom and 2 studio flats) on upper floors.

Decision: Granted with Grampian Condition (3rd August 2018).

364. 17/AP/2773 Malt Street Regeneration Site, Land Bounded By Bianca Road, Latona Road, Haymerle Road, Frensham Street, and Malt Street

Application type: FULL and OUTLINE

Hybrid application comprising a full planning application for Phase 1 (the "Detailed Component") and outline planning permission (the "Outline Component") for Phases 2 and 3:

Detailed Component (Phase 1):

Full planning permission for the demolition of existing buildings and structures and redevelopment of the central area for the erection of a total of 4 buildings, two at 7 storeys (Buildings B9 and B12), one at 15 storeys (Building B10), and one at 44 storeys (Building B4) (max height 147.12m AOD) to provide 420 homes, 1,197 sqm GEA of Class B1(c)

floorspace and 785 sqm GEA of non-residential floor space within classes A1-A4

(retail), Class B1 (business) and Class D1 (public services) and D2 (entertainment and leisure) use, an energy centre (750 sqm) and new public open space and public realm with on street and basement car parking spaces and cycle spaces.

Outline Component (Phase 2 and 3):

Outline planning permission (scale, layout, landscaping, access and appearance reserved) for the demolition of existing buildings and structures and the erection of a seven buildings (B1, B2, B3, B5, B6, B7, B11) ranging in height from 5 to 39 storeys (max height 132.9m AOD) to provide up to 88,052sqm floorspace GEA, comprising up to 880 residential units, up to 3,316 sqm GEA of Class B1(c) floorspace and up to 1,702sqm GEA of non-residential floor space within Classes A1-A4 (retail), Class B1 (business), Class D1 (public services) and D2 (entertainment and leisure) use and car parking spaces at ground level and cycle spaces, with associated new open space, public realm, car parking and associated works.

Totals: Up to 1,300 homes and up to 7,000sqm commercial floorspace.

Decision: Resolution to grant, subject to a legal agreement, referral to the Mayor of London and Secretary of State (3rd June 2019).

365. 18/AP/0897 Ruby Triangle Site, Land bounded by Old Kent Road, Ruby Street and Sandgate Street

Application type: FULL

Full planning permission is sought for demolition of existing buildings and structures on the site, and redevelopment consisting of three buildings at maximum heights of 17 storeys (including mezzanine) (+64.735m AOD), 48 Storeys (+170.830m AOD) and 40 storeys (including mezzanine) (+144.750m AOD), plus single storey basement under part of the site. Development would provide 1,152 residential dwellings (Class C3), retail, business and community spaces (Classes A1, A2, A3, A4, B1(a),(b),(c) and D1), public sports hall and gym (Class D2), public and private open space, formation of new accesses and alterations to existing accesses, energy centre, associated car and cycle parking and other associated works.

366. 18/AP/3246 Land at Cantium Retail Park, 520 Old Kent Road

Application type: FULL

Demolition of existing buildings and redevelopment of the site to provide a new basement level and buildings ranging from 3 to 48 storeys in height (max height 159.05m above ground level) comprising up to 1,113 residential units (Class C3), up to 5,659 sq. m of office floorspace (Class B1(a)), up to 2,228 sq. m of retail floorspace (Class A1), up to 2,336 sq. m of flexible space including use within Classes A1, A3, B1(a), B1(b), D1, D2 and / or Sui Generis (Theatre) within Block B and up to 596 sq. m of flexible space within Classes A1, A2 and / or A3 within Block C together with associated access, car parking, landscaping and infrastructure works.

Decision: Resolution to grant, subject to a legal agreement, referral to the GLA and Secretary of State (5th March 2019).

367. 17/AP/4596 13-14 Frensham Street, (Nye's Wharf)

Application Type: FULL

Demolition of existing buildings and erection of mixed-use scheme comprising 321sqm (GIA) of flexible A1, A2, A3, A4, B1, D1 and D2 floorspace and 882sqm (GIA) of B1 floorspace at ground and mezzanine levels; with 153 Residential units (Class C3) above in two blocks ranging from 9 to 18 storeys with hard and soft landscaping and associated infrastructure works, including three disabled spaces and cycle parking.

Decision: Resolution to grant, subject to a legal agreement and referral to the GLA (3rd September 2018).

368. 17/AP/4612 49-53 Glengall Road

Application type: FULL

Demolition of all existing buildings and structures (excluding some of the facades along Glengall Road and Bianca Road and the industrial chimney) and erection of a part 6, 8 and 15 storey mixed-use development comprising 3,855 sqm (GIA) of flexible workspace (Use Class B1) and 181 residential units (Use Class C3) with amenity spaces and associated infrastructure.

Decision: Resolution to grant, subject to a legal agreement, referral to the GLA and Secretary of State (15th January 2019).

369. 18/AP/3551 Southernwood Retail Park

Application type: FULL and OUTLINE

Hybrid planning application for detailed permission for Phase 1 and outline planning permission for Phase 2 comprising:

Application for full planning permission for 'Phase 1' comprising demolition of existing buildings and the erection of a part 9, part 14, part 15, part 48 storey development (plus basement) up to 161.25m AOD, with 940 sqm GIA of (Class A1) retail use, 541 sqm GIA of flexible (Class A1/A2/A3) retail/financial and professional services/restaurant and café use, 8671 sqm GIA (Class C1) hotel; 541 (class C3) residential units (51,757 sqm GIA); landscaping, public realm and highway works, car and cycle parking and servicing area, plant and associated works.

Application for outline planning permission (with details of internal layouts and external appearance reserved) for 'Phase 2' comprising demolition of existing buildings and the erection of a part 9, part 12, storey development (plus basement) up to 42.80m AOD, with 1049 sqm GIA of flexible (Class A1/A2/A3) retail/financial and professional services/restaurant and café use; 183 (Class C3) residential units

(17,847sqm GIA), 1141 sqm GIA (Class D2) cinema and the creation of a 475 sqm GIA (Class C1) hotel service area at basement level; landscaping, public realm and highway works, car and cycle parking and servicing area, plant and associated works.

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

370. 19/AP/1322 – 840 Old Kent Road

Application type: FULL

Demolition of existing building and redevelopment of the site to provide a new building of up to 13 and 21 storeys in height (maximum height 73.60m above ground level). Redevelopment to comprise 168 residential units (Class C3), a 1,778 sqm (GIA) retail unit (Class A1) and a 52 sqm (GIA) flexible retail unit (Class A1/A3), with associated landscaping, car parking, servicing, refuse and plant areas, and all ancillary or associated works.

Decision: Planning permission granted subject to legal agreement (20 November 2020).

Planning Policy

371. 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

372. The application site is found within the following Planning Policy Designations:

- The Old Kent Road Opportunity Area;
- Draft OKR AAP site OKR 16;
- Preferred Industrial Location - Strategic
- The Urban Density Zone;
- Bermondsey Lake Archaeological Priority Zone;
- The Air Quality Management Area;
- Public Transport Accessibility Level (PTAL) of 4;
- Extended background area (Wider Setting Consultation Area) of LVMF views 2A.1, 3A.1, and 6A.1 and
- Flood Zone 3

373. This application was 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

374. 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.
375. Paragraph 212 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.
376. 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
377. National Planning Policy Guidance (2014) is a web-based resource which brings together planning guidance on various topics into one place.

London Plan 2016

378. The London Plan is the regional planning framework and was adopted in 2016. The most relevant policies are those listed below.
379. Policy 2.17 - Strategic Industrial locations
Policy 3.1 - Ensuring Equal Life Chances for All
Policy 3.3 - Increasing housing supply
Policy 3.5 - Quality and design of housing developments
Policy 3.6 - Children and young people's play and informal recreation facilities
Policy 3.8 - Housing choice
Policy 3.9 - Mixed and balanced communities
Policy 3.10 - Definition of affordable housing
Policy 3.11 - Affordable housing targets
Policy 3.12 - Negotiating affordable housing on individual private residential and mixed use schemes
Policy 3.13 - Affordable housing thresholds
Policy 3.16 - Protection and Enhancement of Social Infrastructure
Policy 4.3 - Mixed use development and offices
Policy 4.4 - Managing industrial land and premises
Policy 5.7 - Renewable energy
Policy 5.8 - Innovative energy technologies
Policy 5.11 - Green roofs and development site environs

Policy 5.12 - Flood risk management
Policy 5.13 - Sustainable drainage
Policy 5.21 - Contaminated land
Policy 6.9 - Cycling
Policy 6.10 - Walking
Policy 6.13 - Parking
Policy 7.2 - An inclusive environment
Policy 7.3 - Designing out crime
Policy 7.4 - Local character
Policy 7.6 - Architecture
Policy 7.21 - Trees and woodlands
Policy 8.2 - Planning obligations
Policy 8.3 - Community infrastructure levy

380. 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.
381. 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

382. The following Mayoral SPGs are relevant to the consideration of this application:
383. Homes for Londoners (2017)
London View Management Framework (2012)
London's World Heritage Sites SPG (2012)
Providing for Children and Young People’s Play and Informal Recreation (2008)
Use of planning obligations in the funding of Crossrail (2010)
Affordable Housing and Viability SPG (2017)

Core Strategy 2011

384. The Core Strategy was adopted in 2011 providing the spatial planning strategy for the borough. The strategic policies in the Core Strategy are relevant alongside the saved Southwark Plan (2007) policies. The relevant policies of the Core Strategy 2011 are:
- Strategic policy 1 - Sustainable development
Strategic policy 2 - Sustainable transport
Strategic policy 3 - Shopping, leisure and entertainment
Strategic policy 4 - Places for learning, enjoyment and healthy lifestyles

Strategic policy 5 - Providing new homes
 Strategic policy 6 - Homes for people on different incomes
 Strategic policy 7 - Family homes
 Strategic policy 10 - Jobs and businesses
 Strategic policy 11 - Open spaces and wildlife
 Strategic policy 12 - Design and conservation
 Strategic policy 13 - High environmental standards
 Strategic policy 14 - Implementation and delivery

Southwark Plan 2007 (July) - Saved Policies

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

Policy 1.1 - Access to employment opportunities
 Policy 1.2 - Strategic and local preferred industrial locations
 Policy 1.5 - Small businesses
 Policy 2.2 - Provision of new community facilities
 Policy 2.5 - Planning obligations
 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 3.9 - Water
 Policy 3.11 - Efficient use of land
 Policy 3.12 - Quality in design
 Policy 3.13 - Urban design
 Policy 3.14 - Designing out crime
 Policy 3.15 - Conservation of the Historic Environment
 Policy 3.18 – Setting of Listed Buildings, Conservation Areas and World Heritage Sites
 Policy 3.19 – Archaeology
 Policy 3.20 – Tall Buildings
 Policy 3.22 – Important Local Views
 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 5.2 - Transport impacts
 Policy 5.3 - Walking and cycling
 Policy 5.6 - Car parking
 Policy 5.7 - Parking standards for disabled people and the mobility impaired

Supplementary Planning Documents (SPDs)

386. 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

387. 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.

388. 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.

The policies from the Intend to Publish version relevant to this application, all of which are informed by the six Good Growth Objectives, are:

Policy SD1 – Opportunity Areas
Policy D1 – London’s form, character and capacity for growth
Policy D2 – Infrastructure requirements for sustainable densities
Policy D3 – Optimizing site capacity through design-led approach
Policy D4 – Delivering good design
Policy D5 – Inclusive design
Policy D8 – Public Realm
Policy D9 – Tall Buildings
Policy D11 – Safety, security and resilience to emergency

Policy D12 – Fire Safety
 Policy D14 – Noise
 Policy H1 - Increasing housing supply
 Policy H4 – Delivering affordable housing
 Policy H5 – Threshold approach to applications
 Policy H6 – Affordable housing tenure
 Policy H7 – Monitoring affordable housing
 Policy H10 – Housing size mix
 Policy H15 – Purpose-built student accommodation
 Policy E2 – Providing suitable business space
 Policy E3 – Affordable workspace
 Policy E5 – Strategic Industrial Locations (SIL)
 Policy E7 – Industrial intensification, co-location and substitution
 Policy G5 – Urban Greening
 Policy G6 – Biodiversity and access to nature
 Policy SI 1 – Improving Air Quality
 Policy SI 2 – Minimising greenhouse gas emissions
 Policy SI 3 – Energy infrastructure
 Policy SI 4 – Managing heat risk
 Policy SI 5 – Water infrastructure
 Policy SI 7 – Reducing waste and supporting the circular economy
 Policy SI 9 – Waste capacity and net waste self-sufficiency
 Policy SI 12 – Flood risk management
 Policy SI 13 – Sustainable drainage
 Policy T1 – Strategic approach to transport
 Policy T2 – Healthy streets
 Policy T3 – Transport capacity, connectivity and safeguarding
 Policy T4 – Assessing and mitigating transport impacts
 Policy T5 – Cycling
 Policy T6 – Car parking
 Policy T6.1 – Residential parking
 Policy T6.2 – Office parking
 Policy T6.5 – Non-residential disabled persons parking
 Policy T7 – Deliveries, servicing and construction
 Policy T9 – Funding transport infrastructure through planning

New Southwark Plan

389. 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 in summer 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 2021 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.

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

390. The council is preparing an Area Action Plan/Opportunity Area Planning Framework for Old Kent Road (AAP/OAPF) which proposes significant transformation of the Old Kent Road area over the next 20 years, including the extension of the Bakerloo Line with new stations along the Old Kent Road towards New Cross and Lewisham. Consultation has been underway for 4 years, with a first draft published in 2016. A further preferred option of the Old Kent Road AAP (Regulation 18) was published in December 2017 and concluded consultation on 21 March 2018. As the document is still in draft form, it can only be attributed limited weight.
391. Whilst acknowledging this limited weight, members are advised that the draft OKR AAP places the application site within the proposed Action Area Core, and within proposal site OKR 16 which covers the area bounded by Hatcham Road, Ilderton Road and the Old Kent Road (South). Requirements for this allocation site include the re-provision of existing industrial floor space, and to provide residential accommodation along with the provision of Affordable Workspace.

ENVIRONMENTAL IMPACT ASSESSMENT

392. No request for an Environmental Impact Assessment (EIA) was carried out in accordance with Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. It is noted that the regulations raise and amend the thresholds at which certain types of development project will need to be screened in order to determine whether an environmental impact assessment is required. The development could be considered an urban development project under Schedule 2 of the Regulations. As the development would not introduce more than 150 dwellings it is therefore not necessary to assess the potential impact against Schedule 2 of the EIA Regulations.

Human rights implications

393. This planning application engages certain human rights under the Human Rights Act 1998 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.
394. This application has the legitimate aim of providing new mixed use development. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

395. None

BACKGROUND INFORMATION

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
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: 0207 525 1513 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	Troy Davies, Team Leader
Version	Final
Dated	9 December 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		14 December 2020