

Planning Committee

Tuesday 9 October 2018

6.30 pm

Ground Floor Meeting Room G01C - 160 Tooley Street, London SE1 2QH

Membership

Councillor Martin Seaton (Chair)
Councillor Lorraine Lauder MBE (Vice-Chair)
Councillor James McAsh
Councillor Hamish McCallum
Councillor Adele Morris
Councillor Jason Ochere
Councillor Cleo Soanes
Councillor Kath Whittam

Reserves

Councillor James Coldwell
Councillor Tom Flynn
Councillor Renata Hamvas
Councillor Darren Merrill
Councillor Jane Salmon

INFORMATION FOR MEMBERS OF THE PUBLIC

Access to information

You have the right to request to inspect copies of minutes and reports on this agenda as well as the background documents used in the preparation of these reports.

Babysitting/Carers allowances

If you are a resident of the borough and have paid someone to look after your children, an elderly dependant or a dependant with disabilities so that you could attend this meeting, you may claim an allowance from the council. Please collect a claim form at the meeting.

Access

The council is committed to making its meetings accessible. Further details on building access, translation, provision of signers etc for this meeting are on the council's web site: www.southwark.gov.uk or please contact the person below.

Contact

Everton Roberts on 020 7525 7221 or email: everton.roberts@southwark.gov.uk

Members of the committee are summoned to attend this meeting

Eleanor Kelly

Chief Executive

Date: 1 October 2018



Planning Committee

Tuesday 9 October 2018

6.30 pm

Ground Floor Meeting Room G01C - 160 Tooley Street, London SE1 2QH

Order of Business

Item No.	Title	Page No.
	PART A - OPEN BUSINESS	
	PROCEDURE NOTE	
1.	APOLOGIES	
	To receive any apologies for absence.	
2.	CONFIRMATION OF VOTING MEMBERS	
	A representative of each political group will confirm the voting members of the committee.	
3.	NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT	
	In special circumstances, an item of business may be added to an agenda within five clear days of the meeting.	
4.	DISCLOSURE OF INTERESTS AND DISPENSATIONS	
	Members to declare any personal interests and dispensation in respect of any item of business to be considered at this meeting.	
5.	MINUTES	3 - 6
	To approve as a correct record the Minutes of the open section of the meeting held on 3 September 2018.	

Item No.	Title	Page No.
6.	DEVELOPMENT MANAGEMENT	7 - 11
	6.1. ALL SAINTS ANNEXE (IMPERIAL WAR MUSEUM) AND LAND TO THE REAR, AUSTRAL STREET, LONDON, SE11 4SJ	12 - 72
	6.2. 160 BLACKFRIARS ROAD AND LAND TO THE REAR, LONDON SE1 8EZ	73 - 130
	6.3. RUBY TRIANGLE SITE, LAND BOUNDED BY OLD KENT ROAD, RUBY STREET AND SANDGATE STREET, LONDON SE15 1LG	131 - 274

ANY OTHER OPEN BUSINESS AS NOTIFIED AT THE START OF THE MEETING AND ACCEPTED BY THE CHAIR AS URGENT.

EXCLUSION OF PRESS AND PUBLIC

The following motion should be moved, seconded and approved if the committee wishes to exclude the press and public to deal with reports revealing exempt information:

“That the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in paragraphs 1-7, Access to Information Procedure rules of the Constitution.”

PART B - CLOSED BUSINESS

ANY OTHER CLOSED BUSINESS AS NOTIFIED AT THE START OF THE MEETING AND ACCEPTED BY THE CHAIR AS URGENT.

Date: 1 October 2018



Planning Committee

Guidance on conduct of business for planning applications, enforcement cases and other planning proposals

1. The reports are taken in the order of business on the agenda.
2. The officers present the report and recommendations and answer points raised by members of the committee.
3. The role of members of the planning committee is to make planning decisions openly, impartially, with sound judgement and for justifiable reasons in accordance with the statutory planning framework.
4. The following may address the committee (if they are present and wish to speak) for **not more than 3 minutes each**.

- | |
|---|
| <ol style="list-style-type: none">(a) One representative (spokesperson) for any objectors. If there is more than one objector wishing to speak, the time is then divided within the 3-minute time slot.(b) The applicant or applicant's agent.(c) One representative for any supporters (who live within 100 metres of the development site).(d) Ward councillor (spokesperson) from where the proposal is located.(e) The members of the committee will then debate the application and consider the recommendation. |
|---|

Note: Members of the committee may question those who speak only on matters relevant to the roles and functions of the planning committee that are outlined in the constitution and in accordance with the statutory planning framework.

5. If there are a number of people who are objecting to, or are in support of, an application or an enforcement of action, you are requested to identify a representative to address the committee. If more than one person wishes to speak, the 3-minute time allowance must be divided amongst those who wish to speak. Where you are unable to decide who is to speak in advance of the meeting, you are advised to meet with other objectors in the foyer of the council offices prior to the start of the meeting to identify a representative. If this is not possible, the chair will ask which objector(s) would like to speak at the point the actual item is being considered.
6. Speakers should lead the committee to subjects on which they would welcome further questioning.
7. Those people nominated to speak on behalf of objectors, supporters or applicants, as well as ward members, should sit on the front row of the public seating area. This is for ease of communication between the committee and the speaker, in case any issues need to be clarified later in the proceedings; it is **not** an opportunity to take part in the debate of the committee.

8. Each speaker should restrict their comments to the planning aspects of the proposal and should avoid repeating what is already in the report. The meeting is not a hearing where all participants present evidence to be examined by other participants.
9. This is a council committee meeting which is open to the public and there should be no interruptions from the audience.
10. No smoking is allowed at committee.
11. Members of the public are welcome to film, audio record, photograph, or tweet the public proceedings of the meeting; please be considerate towards other people in the room and take care not to disturb the proceedings.

The arrangements at the meeting may be varied at the discretion of the chair.

Contacts: General Enquiries
Planning Section, Chief Executive's Department
Tel: 020 7525 5403

Planning Committee Clerk, Constitutional Team
Finance and Governance
Tel: 020 7525 5485



Planning Committee

MINUTES of the OPEN section of the Planning Committee held on Monday 3 September 2018 at 6.30 pm at Ground Floor Meeting Room G02A - 160 Tooley Street, London SE1 2QH

PRESENT: Councillor Martin Seaton (Chair)
 Councillor James McAsh
 Councillor Hamish McCallum
 Councillor Adele Morris
 Councillor Jason Ochere
 Councillor Cleo Soanes
 Councillor Kath Whittam
 Councillor Darren Merrill

OTHER MEMBERS PRESENT: Councillor James Coldwell

OFFICER SUPPORT: Colin Wilson, Planning
 Martin McKay, Planning
 Yvonne Lewis, Planning
 Kiran Chauhan, Planning
 Vicky Crosby, Planning
 Philippa Howson, Planning
 Margaret Foley, Legal services
 Virginia Wynn-Jones, Constitutional team

1. APOLOGIES

Apologies were received from Councillor Lorraine Lauder. Councillor Darren Merrill attended as reserve.

2. CONFIRMATION OF VOTING MEMBERS

The members present were confirmed as the voting members.

3. NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT

The chair gave notice of the following additional papers which were circulated at the meeting:

- Addendum report relating to items 7.1, 7.2 and 7.3
- Members' pack relating to items 7.1, 7.2 and 7.3.

4. **DISCLOSURE OF INTERESTS AND DISPENSATIONS**

There were none.

5. **MINUTES**

The minutes of the meetings of 3 July 2018 and 16 July 2018 were agreed as a correct record and signed by the chair.

6. **PLANNING SUB-COMMITTEE ARRANGEMENTS FOR 2018-19 (APPOINTMENT OF VICE-CHAIR FOR SUB-COMMITTEE B)**

There was one nomination for the position of vice-chair of planning, Councillor Damian O'Brien. It was moved, seconded and

RESOLVED:

That Councillor Damian O'Brien be appointed as vice-chair of planning sub-committee B.

7. **DEVELOPMENT MANAGEMENT**

RESOLVED:

1. That the determination of planning applications, or formal observations and comments, the instigation of enforcement action and the receipt of the reports included in the attached items be considered.
2. That the decisions made on the planning applications be subject to the conditions and/or made for the reasons set out in the attached reports unless otherwise stated.
3. That where reasons for decisions or conditions are not included or not as included in the reports relating to an individual item, they be clearly specified.

7. **33-38 RUSHWORTH STREET, LONDON, SE1 0RB 1-7 KING BENCH STREET SE1**

Planning application reference: **17/AP/4289**

RESOLVED:

That this item be deferred until a later meeting.

7. KENNINGTON AND WALWORTH DELIVERY CENTRE, 111-123 CRAMPTON STREET, LONDON, SE17 3AA

Planning application reference: 18/AP/0737

Report: see pages 67 to 125 of the agenda pack, and the addendum report.

PROPOSAL

Demolition and redevelopment for a mixed use development in a part four-/five-/six-/seven-storey building consisting of 48 residential units (2 studios, 17x 1-bedroom, 24x 2-bedroom and 5x 3-bedroom flats), 221sqm of commercial floorspace (Use Class B1 - office), creation of new public realm, provision of 3 wheelchair accessible car parking spaces and associated landscaping.

The committee heard the officer's introduction to the report and addendum report. Councillors asked questions of the officer.

An objector addressed the meeting. Members of the committee asked questions of the objector.

The applicant's agent addressed the committee. Members of the committee asked questions of the applicant's agent.

There were no supporters who lived within 100m of the development site present and wished to speak.

Councillor James Coldwell addressed the meeting in his capacity as ward councillor, and answered questions by the committee.

The committee put further questions to officers and discussed the application.

A motion to grant planning permission as set out in the report and addendum report was moved, seconded, put to the vote and declared carried.

RESOLVED:

That planning permission be granted, subject to conditions and the applicant entering into an appropriate legal agreement.

That in the event that the requirements of a) are not met by 4 January 2019, the Director of Planning be authorised to refuse planning permission (if appropriate) for the reasons set out in paragraph 132 of the report.

7. NYES WHARF, FRENHAM STREET, LONDON, SE15 6TH

Planning application reference: 17/AP/4596

Report: see pages 126 to 182 of the agenda pack, and the addendum report.

PROPOSAL

Demolition of existing buildings and erection of mixed-use scheme comprising 1,193sqm Class B1 floorspace at ground and mezzanine levels; with 153 Residential units (Class C3) above in a building ranging from 9 to 18 storeys (max height 56.202m) with hard and soft landscaping including a new park and associated infrastructure works, including three disabled spaces and cycle parking.

The committee heard the officer's introduction to the report and addendum report. Councillors asked questions of the officer.

There were no objectors present and wishing to speak.

The applicant's agent addressed the committee. Members of the committee asked questions of the applicant's agent.

There were no supporters who lived within 100m of the development site present and wished to speak.

There were no ward councillors present and wishing to speak.

The committee put further questions to officers and discussed the application.

A motion to grant planning permission as set out in the report and addendum report, with three amendments, was moved, seconded, put to the vote and declared carried.

RESOLVED:

That planning permission be granted, subject to conditions and following the completion of a s106 agreement by no later than 8 March 2019 and subject to the referral to the Mayor of London.

In the event that the s106 agreement is not completed by 8 March 2019, that the director of planning be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 162 of the report.

Meeting ended at 9.00 pm

CHAIR:

DATED:

Item No. 6.	Classification: Open	Date: 9 October 2018	Meeting Name: Planning Committee
Report title:		Development Management	
Ward(s) or groups affected:		All	
From:		Proper Constitutional Officer	

RECOMMENDATIONS

1. That the determination of planning applications, or formal observations and comments, the instigation of enforcement action and the receipt of the reports included in the attached items be considered.
2. That the decisions made on the planning applications be subject to the conditions and/or made for the reasons set out in the attached reports unless otherwise stated.
3. That where reasons for decisions or conditions are not included or not as included in the reports relating to an individual item, they be clearly specified.

BACKGROUND INFORMATION

4. The council's powers to consider planning business are detailed in Part 3F which describes the role and functions of the planning committee and planning sub-committees. These were agreed by the annual meeting of the council on 23 May 2012. The matters reserved to the planning committee and planning sub-committees exercising planning functions are described in part 3F of the Southwark Council constitution.

KEY ISSUES FOR CONSIDERATION

5. In respect of the attached planning committee items members are asked, where appropriate:
 - a. To determine those applications in respect of site(s) within the borough, subject where applicable, to the consent of the Secretary of State for Communities and Local Government and any directions made by the Mayor of London.
 - b. To give observations on applications in respect of which the council is not the planning authority in planning matters but which relate to site(s) within the borough, or where the site(s) is outside the borough but may affect the amenity of residents within the borough.
 - c. To receive for information any reports on the previous determination of applications, current activities on site, or other information relating to specific planning applications requested by members.

6. Each of the following items are preceded by a map showing the location of the land/property to which the report relates. Following the report, there is a draft decision notice detailing the officer's recommendation indicating approval or refusal. Where a refusal is recommended the draft decision notice will detail the reasons for such refusal.
7. Applicants have the right to appeal to Planning Inspector against a refusal of planning permission and against any condition imposed as part of permission. Costs are incurred in presenting the council's case at appeal which maybe substantial if the matter is dealt with at a public inquiry.
8. The sanctioning of enforcement action can also involve costs such as process serving, court costs and of legal representation.
9. Where either party is felt to have acted unreasonably in an appeal the inspector can make an award of costs against the offending party.
10. All legal/counsel fees and costs as well as awards of costs against the council are borne by the budget of the relevant department.

Community impact statement

11. Community impact considerations are contained within each item.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Director of Law and Democracy

12. A resolution to grant planning permission shall mean that the director of planning is authorised to grant planning permission. The resolution does not itself constitute the permission and only the formal document authorised by the committee and issued under the signature of the director of planning shall constitute a planning permission. Any additional conditions required by the committee will be recorded in the minutes and the final planning permission issued will reflect the requirements of the planning committee.
13. A resolution to grant planning permission subject to legal agreement shall mean that the director of planning is authorised to issue a planning permission subject to the applicant and any other necessary party entering into a written agreement in a form of words prepared by the director of law and democracy, and which is satisfactory to the director of planning. Developers meet the council's legal costs of such agreements. Such an agreement shall be entered into under section 106 of the Town and Country Planning Act 1990 or under another appropriate enactment as shall be determined by the director of law and democracy. The planning permission will not be issued unless such an agreement is completed.
14. Section 70 of the Town and Country Planning Act 1990 as amended requires the council to have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations when dealing with applications for planning permission. Where there is any conflict with any policy contained in the development plan, the conflict must be resolved in favour of the policy which is

contained in the last document to be adopted, approved or published, as the case may be (s38(5) Planning and Compulsory Purchase Act 2004).

15. Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The development plan is currently Southwark's Core Strategy adopted by the council in April 2011, saved policies contained in the Southwark Plan 2007, the where there is any conflict with any policy contained in the development plan, the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published, as the case may be (s38(5) Planning and Compulsory Purchase Act 2004).
16. On 15 January 2012 section 143 of the Localism Act 2011 came into force which provides that local finance considerations (such as government grants and other financial assistance such as New Homes Bonus) and monies received through CIL (including the Mayoral CIL) are a material consideration to be taken into account in the determination of planning applications in England. However, the weight to be attached to such matters remains a matter for the decision-maker.
17. "Regulation 122 of the Community Infrastructure Levy regulations (CIL) 2010, provides that "a planning obligation may only constitute a reason for granting planning permission if the obligation is:
 - a. necessary to make the development acceptable in planning terms;
 - b. directly related to the development; and
 - c. fairly and reasonably related to the scale and kind to the development.

A planning obligation may only constitute a reason for granting planning permission if it complies with the above statutory tests."

18. The obligation must also be such as a reasonable planning authority, duly appreciating its statutory duties can properly impose i.e. it must not be so unreasonable that no reasonable authority could have imposed it. Before resolving to grant planning permission subject to a legal agreement members should therefore satisfy themselves that the subject matter of the proposed agreement will meet these tests.
19. The National Planning Policy Framework (NPPF) came into force on 27 March 2012. The NPPF replaces previous government guidance including all PPGs and PPSs. For the purpose of decision-taking policies in the Core Strategy (and the London Plan) should not be considered out of date simply because they were adopted prior to publication of the NPPF. For 12 months from the day of publication, decision-takers may continue to give full weight to relevant policies adopted in accordance with the Planning and Compulsory Purchase Act (PCPA) 2004 even if there is a limited degree of conflict with the NPPF.
20. In other cases and following and following the 12 month period, due weight should be given to relevant policies in existing plans according to their degree of consistency with the NPPF. This is the approach to be taken when considering saved plan policies under the Southwark Plan 2007. The approach to be taken is that the closer the

policies in the Southwark Plan to the policies in the NPPF, the greater the weight that may be given.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Council assembly agenda 23 May 2012	Constitutional Team 160 Tooley Street London SE1 2QH	Virginia Wynn-Jones 020 7525 7055
Each planning committee item has a separate planning case file	Development Management 160 Tooley Street London SE1 2QH	The named case officer as listed or the Planning Department 020 7525 5403

APPENDICES

No.	Title
None	

AUDIT TRAIL

Lead Officer	Chidilim Agada, Head of Constitutional Services		
Report Author	Everton Roberts, Principal Constitutional Officer Jon Gorst, Head of Regeneration and Development (Legal Services)		
Version	Final		
Dated	1 October 2018		
Key Decision?	No		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title	Comments sought	Comments included	
Director of Law and Democracy	Yes	Yes	
Director of Planning	No	No	
Cabinet Member	No	No	
Date final report sent to Constitutional Team			1 October 2018

ITEMS ON AGENDA OF THE PLANNING COMMITTEE
on Tuesday 09 October 2018

Appl. Type	Full Planning Application	Reg. No.	18-AP-1577
Site	ALL SAINTS ANNEXE (IMPERIAL WAR MUSEUM) AND LAND TO THE REAR, AUSTRAL STREET, LONDON, SE11 4SJ	TP No.	TP/1357-A
		Ward	St Georges
		Officer	Patrick Cronin

Recommendation GRANT PERMISSION

Item 6/1

Proposal

Construction of a three-storey building for Class D1 use (to provide offices and staff accommodation ancillary to the Imperial War Museum) within the rear yard, to incorporate rooftop plant and photovoltaics, together with the change of use of the existing All Saints Annexe building from Class D1 (ancillary to the museum) use to a mixed Class B1 (office) / Class D1 (ancillary to museum) use. The development will include hard and soft landscaping improvements, the provision of a cycle and refuse store, the provision of one accessible car parking space at the front of the All Saints Annexe building, the rebuilding of the site's boundary wall to Geraldine Mary Harmsworth Park, the realignment of the access road into the site from the Park, demolition of the portakabins and other associated works.

Appl. Type	Full Planning Application	Reg. No.	18-AP-1215
Site	160 BLACKFRIARS ROAD AND LAND TO THE REAR, LONDON SE1 8EZ	TP No.	TP/1390-157
		Ward	Borough & Bankside
		Officer	Christopher Kirby

Recommendation GRANT SUBJECT TO LEGAL AGREEMENT AND GLA

Item 6/2

Proposal

Erection of a 10 storey building (40.23m AOD) with basement, comprising a 220 bedroom hotel with ancillary restaurant (Class C1); flexible office space (Class B1); retail units (Class A1/A3); creation of public space; landscaping and associated works. Works to the existing building at ground and roof levels (including a new rooftop terrace, enclosure and PV panels); elevational alteration; creation of a new entrance and the installation of an architectural feature along the Blackfriars Road elevation.

Appl. Type	Full Planning Application	Reg. No.	18-AP-0897
Site	RUBY TRIANGLE SITE, LAND BOUNDED BY OLD KENT ROAD, RUBY STREET AND SANDGATE STREET, LONDON SE15 1LG	TP No.	TP/2404-1
		Ward	Old Kent Road
		Officer	Sarah Parsons

Recommendation GRANT SUBJECT TO LEGAL AGRT, GLA AND SOS

Item 6/3

Proposal

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 (plus mezzanine) (+64.735m AOD), 48 Storeys (+170.830m AOD) and 40 storeys (plus mezzanine) (+144.750m AOD), plus single storey basement under part of the site. Development would provide 1,165 residential dwellings (Class C3), flexible retail, business and communal space (Class A1/A2/A3/A4/A5/B1/B8/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.

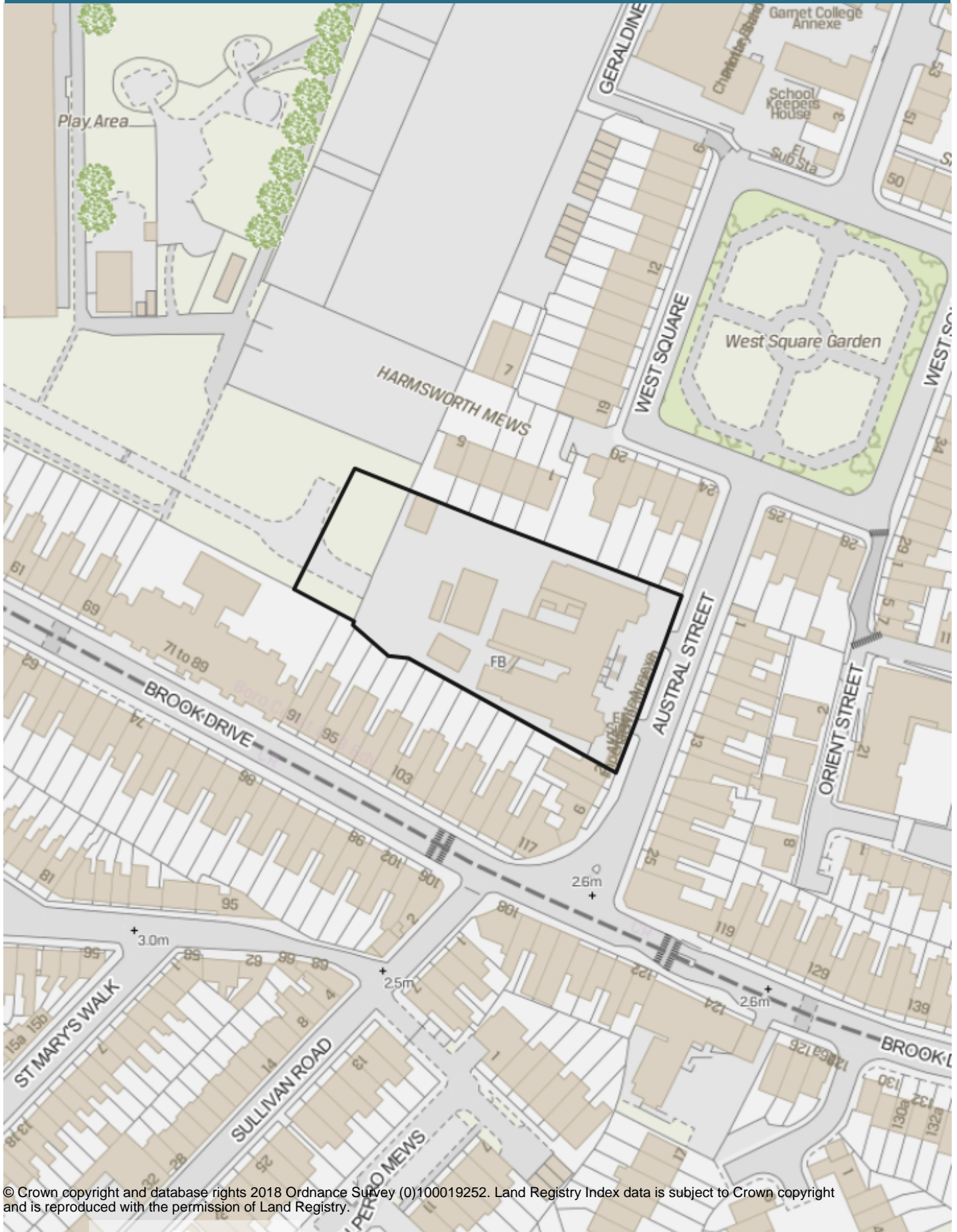
This application represents a departure from strategic policy 10 'Jobs and Businesses' of the Core Strategy (2011) and Saved Policy 1.2 'Strategic and Local Preferred Industrial Locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location.

THE APPLICATION IS ACCOMPANIED BY AN ENVIRONMENTAL STATEMENT submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) regulations 2017. The ES can be viewed on the Council's website. Copies of the ES may be obtained from rubbytriangle@glhearn.com at a charge of £20 for CD copy of the full ES, £150 for a hard copy of the ES Main Report (Volume 1), £100 for a hard copy of the ES Drawings and Appendices (Volume 2). There would be no charge for an emailed copy or single hard copy of the Non Technical Summary (Volume 3).

Agenda Item 6.1



ALL SAINTS ANNEXE (IMPERIAL WAR MUSEUM) AND LAND TO THE REAR, AUSTRAL STREET, SE16 2ET



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50 m

Scale = 1250

27-Sep-2018



Item No. 6.1	Classification: Open	Date: 9 October 2018	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 18/AP/1577 for: Full Planning Application Address: ALL SAINTS ANNEXE (IMPERIAL WAR MUSEUM) AND LAND TO THE REAR, AUSTRAL STREET, LONDON, SE11 4SJ Proposal: Construction of a three-storey building for Class D1 use (to provide offices and staff accommodation ancillary to the Imperial War Museum) within the rear yard, to incorporate rooftop plant and photovoltaics, together with the change of use of the existing All Saints Annexe building from Class D1 (ancillary to the museum) use to a mixed Class B1 (office) / Class D1 (ancillary to museum) use. The development will include hard and soft landscaping improvements, the provision of a cycle and refuse store, the provision of one accessible car parking space at the front of the All Saints Annexe building, the rebuilding of the site's boundary wall to Geraldine Mary Harmsworth Park, the realignment of the access road into the site from the Park, demolition of the portakabins and other associated works.		
Ward(s) or groups affected:	St George's		
From:	Director of Planning		
Application Start Date 03/05/2018		Application Expiry Date 02/08/2018	
Earliest Decision Date 16/06/2018			

RECOMMENDATION

1. That planning permission be granted subject to conditions.

BACKGROUND INFORMATION

Site location and description

2. The application site comprises a late 19th Century three-winged building of three storeys with a raised basement, known as the All Saints Annexe, currently in a use as ancillary floorspace to the nearby Imperial War Museum London (IWML). The All Saints Annexe provides office floorspace and houses the Museum's photography, film and video archive as well as the organisation's computer servers. The site includes a forecourt, accessways along either side of the building, and a large rear yard in which portakabins and several shipping containers currently stand. There is also an emergency generator associated with the IT servers located to the rear of the All Saints Annexe. The three boundaries to the north, south and west of the site are all formed of high masonry walls.
3. The application site also includes a 0.05 hectare portion of the Geraldine Mary Harmsworth Park adjacent to the site's north-western boundary. This portion of parkland brings the total site area to 0.36 hectares.

4. The site is bounded by:

- residential properties numbering 20-24 West Square and 1-5 Harmsworth Mews to the northeast;
- the highway of Austral Street to the southeast;
- residential properties numbering 91-111 (odds) Brook Drive, the garden of 71-89 Brook Drive and 2 Austral Street to the southwest;
- Geraldine Mary Harmsworth Park to the northwest, beyond which is IWML.



Figure 1: Site location plan, showing the boundaries of the application site edged in red. The 0.05 hectare area of Geraldine Mary Harmsworth Park, which is owned and managed by Southwark Council, can be seen within the top left hand portion of the red line boundary.

5. To the south and east of the site, surrounding uses are predominantly residential. In the vicinity of the site to the north and west, a mixture of residential, educational, cultural and open space uses can be found. The housing stock in the nearby area, including those dwellings which adjoin the application site to the north and south, is prevalingly three or four-storeyed. In the main part, it is only the few non-residential buildings - namely the All Saints Annexe itself, IWML and the Charlotte Sharman School - which are taller.
6. The site is located within the:
- Central Activities Zone (CAZ);
 - Elephant and Castle Opportunity Area;
 - Borough, Bermondsey and Rivers Archaeological Priority Zone;
 - Air Quality Management Area;
 - Elephant and Castle Major Town Centre, and;
 - Flood Zone 3 (area benefitting from flood defences).
7. The site is located within the West Square Conservation Area, the Appraisal for which identifies the All Saints Annexe as a key unlisted building. The site lies approximately 5 metres to the northwest of the Elliott's Row Conservation Area. Two other conservation areas, both of which are within the Borough of Lambeth lie within the surrounding area: Walcot, which is approximately 30 metres southwest of the site, and

Lambeth Walk and China Walk, which is approximately 220 metres to the west.

8. Within 100 metres of the site are the following listed structures:
 - nos. 6-45 West Square and attached railings (Grade II);
 - nos. 1-7 Orient Street and attached railings (Grade II),
 - Charlotte Sharman School (Grade II), and;
 - IWML (Grade II).
9. Geraldine Mary Harmsworth Park is designated as a Site of Importance for Nature Conservation and all but a small pocket of land in the park's southern corner (immediately to the northwest of the application site) is designated as Metropolitan Open Land. The submission version of the New Southwark Plan seeks to designate this small portion of the park, which historically contained a swimming pool, as Metropolitan Open Land.
10. The application site accommodates eight trees: four on the forecourt and four within the rear yard. Those on the forecourt are high value (grade A) specimens, while those in the rear yard are of moderate value (grade B).
11. The application site lies within the background of LVMF Protected View 23.A, which is the view towards Westminster from the bridge over the Serpentine at Hyde Park.
12. It has a Public Transport Accessibility Level (PTAL) of 6b where 1 is the lowest level and 6b the highest. Within easy walking distance are Lambeth North and Waterloo Stations to the north-west, and Elephant and Castle Station to the east. Southwark and Kennington Underground Stations can be found further away to the north and south respectively. A number of bus services operate along Kennington Road, Lambeth Road, and St George's Road. There are four London Cycle hire docking stations located nearby on Kennington Road, Walnut Tree Walk, Geraldine Street and Gaywood Street. A controlled parking zone designation applies locally.
13. The centreline of Brook Drive, which lies approximately 50 metres to the southwest of the site, demarcates the Borough of Southwark from the Borough of Lambeth.

Background to the proposal

14. The IWML is the flagship branch of the Imperial War Museums. In addition to IWML, the charity's estate comprises the Imperial War Museum North, the Imperial War Museum Duxford, the Churchill Museum and Cabinet War Rooms, and HMS Belfast. IWML also acts as the administrative headquarters.
15. In 2007, the IWM Board of Trustees agreed that major capital investment was required at the IWML in order to address significant deficiencies and ensure the charity remains fit for purpose in the 21st century. The museum produced a spatial masterplan to identify how IWML could be transformed to improve existing facilities, optimise the visitor experience, and ensure the long term sustainability of the museum's flagship branch.
16. A key conclusion of the masterplan exercise was that the existing layout and room configuration of the All Saints Annexe no longer meets the operational needs of IWM. To attempt to meet these needs by converting or modernising of the premises would require substantial investment and likely prove unsuccessful in any case. The spatial masterplan exercise brought IWM to the conclusion that developing the rear yard of the All Saints Annexe was the most appropriate way to deliver purpose-built modern and flexible workspace better suited to the charity's working practices and long-term needs. Such a new building would fulfil a long-held aim of IWM to accommodate in a single location the core creative and administrative teams for the wider Imperial War

Museum estate, who are currently split across a number of sites.

17. The new building would free-up the All Saints Annexe for an alternative purpose to which it is better lent functionally and spatially. Liability for the maintenance of the ageing All Saints Annexe would be transferred to the new tenant and the rent would be used to offset the running costs of the new build. IWM would retain the freehold of the All Saints Annexe.
18. The masterplan comprises the following phases:
 - Phase 1: Refurbishment of IWML and creation of the First World War galleries [completed in 2014].
 - Phase 2: Creation of new Second World War Galleries and The Holocaust Gallery [due to commence imminently, following the granting of listed building consent and planning permission in April 2018]
 - Phase 3: Creation of new and fit-for-purpose accommodation in which all IWM staff can be located

As such, the works for which 18/AP/1577 seeks planning permission would realise the final phase of the IWM masterplan.

Details of proposal

19. The proposal comprises two distinct parts:
 - the construction of a three-storey building containing workspace for IWM staff within the yard at the rear of the All Saints Annexe, and;
 - the change of use of the All Saints Annexe from Class D1 (ancillary to the museum) to a mixed Class B1 (office) / Class D1 (ancillary to museum) use.

Details of each part follow below.

Construction of a three-storey building within the rear yard

20. It is proposed to redevelop the yard to the rear of the All Saints Annexe through the construction of a three-storey building with rooftop plant to provide offices and staff accommodation ancillary to the IWML. In total, the proposal would deliver 1063 square metres (GIA) of floorspace. The works would include the demolition of the existing portakabins and the removal of the shipping containers.
21. The proposed building would be articulated in two parts. The main volume would be three storeyed and flat-roofed with a raised parapet. The second element, which would assume the role of an entrance pavilion, would similarly be flat roofed but two-storeyed and of a much smaller footprint.



Figure 2: An aerial visualisation of the proposed new building, showing the fin-clad two-storey entrance pavilion on the southwestern side of the main brick-faced three-storey volume.

22. The main body of the building, measuring a maximum width of 27.6 metres and a maximum length of 17.7 metres, would be oriented so that its long axis runs broadly parallel to the terraces of housing to the northeast and southwest. It would stand 12.975 metres high to the parapet level and 13.975 metres high to the top of the plant. A gap of 6.4 metres would separate the building's southeast elevation from the nearest part of the existing All Saints Annexe. Along its north-western edge, the building would extend up to the common boundary with the park at ground floor level, but the upper two storeys would be set-back by a widening distance of 1.7 to 2.8 metres. A range of bronze-framed picture and slit windows would be dispersed across the brick-faced elevations.
23. The entrance pavilion would be of a rectangular footprint, measuring 12.2 metres long and 3.9 metres wide. Standing 7.5 metres high at its maximum point, it would, like the main body of the building, be flat-roofed. The entrance pavilion would be clad in curtain walling, some of which would be opaque - such as the entire first floor level of the south-west elevation - and some of which would be clear glazed. The walling would be clad externally with a regular array of deep protruding bronzed aluminium fins, which would break only around the building's main entrance on the northwest elevation.

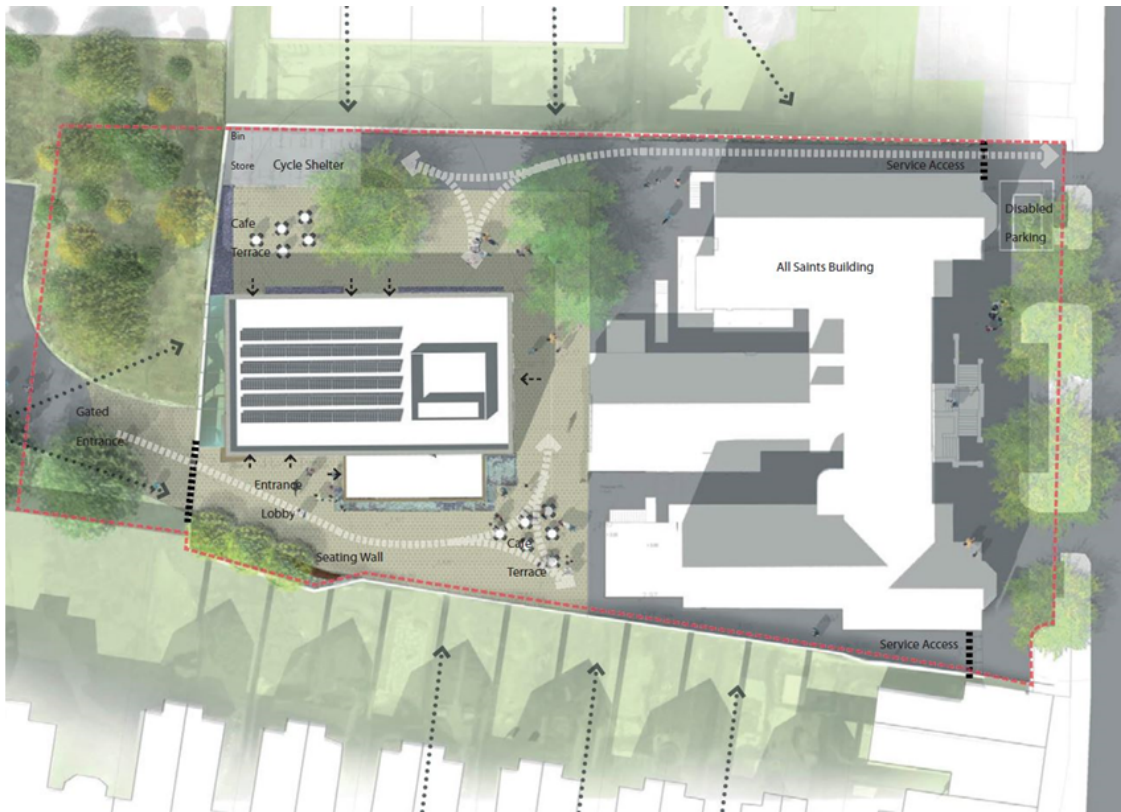


Figure 3: The proposed site plan, showing how the new building would be positioned on the rear yard.

24. The accommodation within the building would be arranged over three floors. The ground floor would be given over to canteen/café space (not open to the general public), meetings areas and the reception. The upper two floors would comprise open plan workspace and a small number of meeting rooms. Toilets and other ancillary facilities would be located on all floors, with a lift and staircore to provide vertical circulation, and a hatch positioned above the staircore to facilitate access to the roof for maintenance purposes.



Figure 4: The southwest elevation of the proposed building.

25. Photovoltaic panels would be positioned on the roof, and all would sit beneath the building's parapet. Mechanical cooling plant, occupying an area measuring 3.2 metres wide and 6.0 metres long, would also be located on the roof and housed in acoustic screening. The structure would be positioned towards the southeastern end of the roof, set-in by identical distances from the building's northeast and southwest edges. The acoustic screening, which would be bronzed aluminium to match the window frames and pavilion fins, would stand proud of the parapet by 1.0 metre. A biodiverse blanket green roof would cover approximately 80% of the surface area of the roof.
26. As part of the construction of the proposed building, the site's boundary wall to Geraldine Mary Harmsworth Park would be rebuilt in brown brick to a height of 2.86 metres. Within the far southwestern end of the wall would be a double leaf pedestrian and vehicle gate providing access between the site and the park.
27. The siting of the building would create two main areas of external space - one area on the building's north-eastern side and one on its south-western side. On the south-western side of the proposed building, an entrance plaza capable of doubling-up as a 'spill-out space' for the canteen/café is proposed. This plaza would be hard-surfaced using clay brick of varying colours which reflect the building façade. The external realm would be for the sole use of the IWM workforce and would not be publicly-accessible.



Figure 5: A visualisation of the proposed building, as seen from the southern corner of the yard. The entrance pavilion and external realm can be seen in the foreground, while Geraldine Mary Harmsworth Park and the Harmsworth Mews properties can be seen in the background.

28. As site servicing would be via the alleyway running along the north-east side of the All Saints Annexe building, the external realm to the north-eastern side of the proposed building would be a more functional external space than the plaza. It is proposed to locate a single-storey structure for the storage of cycles and refuse within the open space to the north-eastern side of the new building alongside the high boundary wall to the Harmsworth Mews properties. This timber-clad shelter would have a monopitched roof with a ridge of height 2.6 metres. A 'living wall' green screen would be attached to approximately two-thirds of the length of the structure's southwest elevation.

29. The layout of the site has been driven by the desire to retain the mature trees on the northern half of the yard which have high amenity value. Further tree planting is proposed within a raised bed along a section of the site's south-western boundary, together with border shrubbery and planting around the building's perimeter.
30. In the south-eastern corner of the park, due to the new gate being in a slightly different position to the existing gate, it is proposed to realign the final few metres of the tarmac access road. A scheme of re-planting is proposed directly in front of the rebuilt boundary wall within Geraldine Mary Harmsworth Park.
31. One accessible parking space would be located in the forecourt of the All Saints Annexe.

Change of use of the All Saints Annexe

32. In tandem with the seeking permission for the construction of a building within the rear yard, this planning application seeks permission to change the use of the All Saints Annexe from wholly Class D1 (ancillary-to-museum) to 'mixed' Class B1 (office) / Class D1 (ancillary-to-museum). The change of use would apply to all 2,476 squares metres (GIA) of floorspace within the building.
33. This 'mixed' use would allow Class B1 and Class D1 functions to take place in the building concurrently, or it would enable the use of the whole space for either Class B1 or Class D1. This would facilitate the building's leasing out to a future tenant for office accommodation or, alternatively, it would enable IWM to occupy the building again in the future if required without needing to seek permission to revert the premises to Class D1. There are no other physical changes proposed to the All Saints Annexe as part of this application.
34. Although reconfiguration of the existing All Saints Annexe may be necessary to suit the needs of the new tenant, these works do not form part of this planning application and permission will be sought separately at a later time if required.

Planning history

35. The following planning history exists for the application site:

<p>Application reference no.: 95/AP/0389 Application type: Full Planning Permission (FUL)</p> <p><i>Erection of 3 storey rear extension to Museum to form storage area, workshops and associated offices</i></p> <p>Decision date: 22.08.1995 Decision: Granted (GRA)</p> <p>Notes: This permission was not implemented.</p>
<p>Application reference no.: 98/AP/1109 Application type: Full Planning Permission (FUL)</p> <p><i>Construction of new basement below previously approved (22.8.95 LBS Reg.No. 9500389) 3 storey rear extension.</i></p> <p>Decision date: 22.08.1995 Decision: Granted (GRA)</p>

Notes: This permission was not implemented.
<p>Application reference no.: 00/AP/0069 Application type: Full Planning Permission (FUL)</p> <p><i>1. Demolition of part existing building and erection of 4/part 3 storey rear extension to form workshops, offices, archive storage and visitor facilities, together with erection of small extension to existing electricity sub-station and access ramp at front of building.</i></p> <p><i>2. Erection of separate two storey temporary building on north-east side of site and two small temporary stores and enclosing screen at front of main building for limited period.</i></p> <p>Decision date: 14.12.2000 Decision: Granted (GRA)</p> <p>Notes: This permission was not implemented.</p>
<p>Application reference no.: 12/AP/0778 Application type: Full Planning Permission (FUL)</p> <p><i>Provision of new windows and a double door to give access to the basement from the South Elevation</i></p> <p>Decision date: 03.05.2012 Decision: Granted (GRA)</p>
<p>Application reference no.: 13/AP/1699 Application type: Full Planning Permission (FUL)</p> <p><i>Installation of a platform lift to front entrance steps to improve accessibility to the building for wheelchair users</i></p> <p>Decision date: 19.08.2013 Decision: Granted (GRA)</p>
<p>Application reference no.: 14/AP/1445 Application type: Full Planning Permission (FUL)</p> <p><i>Installation of emergency diesel generator, reinforced concrete base pad and acoustic enclosure located within the rear yard service compound</i></p> <p>Decision date: 02.02.2015 Decision: Granted (GRA)</p>
<p>Application reference no.: 16/AP/4684 Application type: Non-material Amendment (VNMC)</p> <p><i>Non-material amendment to Condition 4 (materials) of permission 16/AP/1596 to amend the external finished colour of the diesel generator container and associated external input and output attenuators from the specified manufacturers standard colour [...]</i></p> <p>Decision date: 08.12.2016 Decision: Agreed</p>

<p>Application reference no.: 16/AP/1596 Application type: Minor Material Amendment (VMC)</p> <p><i>Minor material amendments to Condition 1 (approved drawings) of planning permission 14/AP/1445 for the 'Installation of emergency diesel generator, reinforced concrete base pad and acoustic enclosure located within the rear yard service compound' to [...]</i></p> <p>Decision date: 07.10.2016 Decision: Granted (GRA)</p>
<p>Application reference no.: 17/AP/3195 Application type: Tree Works</p> <p><i>(T1) London Plane - Fell as it is currently undermining the foundations of the listed wall, repairs to be made to the foundations of the wall will require the complete removal of the tree and the roots</i></p> <p>Decision date: 27.09.2017 Decision: Works acceptable - no intervention (WANI)</p>
<p>Application reference no.: 17/EQ/0448 Application type: Pre-Application Enquiry (ENQ)</p> <p><i>Construction of a building of either three or four storeys on land at the rear of the All Saints Annexe, to comprise administration space for use by the Imperial War Museums (Class D1); change of use of the existing All Saints Annexe (Class D1) to a mixed office/ancillary-to-museum (Class B1/D1) use over all floors.</i></p> <p>Decision date: 14.02.2018 Decision: Pre-application enquiry closed (EQC)</p>

36. There are no relevant cases of planning history locally except for these at IWML:

<p>Application reference no.: 12/AP/0696 Application type: Full Planning Permission (FUL)</p> <p><i>Refurbishment works comprising opening up of the existing brick arches on the west facade, creation of an ancillary cafe terrace and installation of minor plant on the roof and within the rear service yard</i></p> <p>Decision date: 08/05/2012 Decision: Granted (GRA)</p>
<p>Application reference no.: 12/AP/0699 Application type: Listed Building Consent (LBC)</p> <p><i>Refurbishment works comprising opening up of the existing brick arches on the west facade, ancillary cafe terrace and internal relocation of existing cafe to the west wing. Internal works to central atrium including insertion of tapered structural fins, removal of B floor, introduction of temporary stair and insertion of new floor in atrium void at E floor. Alterations and improvements to central circulation core including removal of north wall and insertion of new lifts and stair. Refurbishment of existing galleries to create First World War galleries at A floor and extended galleries at B and C floors.</i></p> <p>Decision date: 08/05/2012</p>

Decision: Granted (GRA)
Application reference no.: 18/AP/0312 Application type: Full Planning Permission (FUL) <i>Refurbishment of windows, including new vents on East, South and West elevations.</i> Decision date: 06.04.2018 Decision: Granted (GRA)
Application reference no.: 18/AP/0313 Application type: Pre-Application Enquiry (ENQ) <i>Internal re-configuration works to create new Second World War Galleries, Holocaust Galleries and learning and event spaces with refurbishment of windows, including new vents on East, South and West elevations.</i> Decision date: 06.04.2018 Decision: Granted (GRA)

KEY ISSUES FOR CONSIDERATION

Summary of main issues

37. The main issues to be considered in respect of this application are:
- a. Preliminary principle of development matters
 - b. Principle of development in terms of land use and conformity with strategic policies;
 - c. Environmental impact assessment;
 - d. Impact of adjoining and nearby uses on occupiers and users of proposed development;
 - e. Impact on the amenity of adjoining occupiers;
 - f. Quality of design
 - g. Impact on the West Square Conservation Area and the setting of nearby heritage assets
 - h. Impact on views in the London View Management Framework
 - i. Impact on the Metropolitan Open Land
 - j. Transport, highways and servicing matters
 - k. Flood risk and sustainable urban drainage
 - l. Trees and landscaping
 - m. Biodiversity and ecology
 - n. Environmental matters
 - o. Construction impacts
 - p. Sustainability
 - q. Planning obligations
 - r. Consultation responses: Members of the public, and;
 - s. Consultation responses: Statutory consultees.

Planning policy

National Planning Policy Framework (the Framework)

38. Chapter 2 - Achieving Sustainable Development
Chapter 4 - Decision-making
Chapter 6 - Building a Strong, Competitive Economy

- Chapter 7 - Ensuring the Vitality of Town Centres
- Chapter 8 - Promoting Healthy and Safe Communities
- Chapter 9 - Promoting Sustainable Transport
- Chapter 11 - Making Efficient Use of Land
- Chapter 12 - Achieving Well-designed Places
- Chapter 13 - Meeting the Challenge of Climate Change, Flooding and Coastal Change
- Chapter 15 - Conserving and Enhancing the Natural Environment
- Chapter 16 - Conserving and Enhancing the Historic Environment

The London Plan 2016

- 39. Policy 1.1 - Delivering the Strategic Vision and Objectives for London
- Policy 2.1 - London in its global, European and United Kingdom context
- Policy 2.5 - Sub-regions
- Policy 2.10 - Central Activities Zone - Strategic Priorities
- Policy 2.11 - Central Activities Zone - Strategic Functions
- Policy 2.12 - Central Activities Zone - predominantly local activities
- Policy 2.13 - Opportunity Areas and Intensification Areas
- Policy 2.15 - Town Centres
- Policy 4.1 - Developing London's Economy
- Policy 4.2 - Offices
- Policy 4.3 - Mixed Use Development and Offices
- Policy 4.5 - London's Visitor Infrastructure
- Policy 4.6 - Support for Enhancement of Arts, Culture, Sport and Entertainment
- Policy 4.7 - Retail and town centre development
- Policy 4.12 - Improving Opportunities for All
- Policy 5.1 - Climate Change Mitigation
- Policy 5.2 - Minimising Carbon Dioxide Emissions
- Policy 5.3 - Sustainable Design and Construction
- Policy 5.5 - Decentralised Energy Networks
- Policy 5.6 - Decentralised Energy in Development Proposals
- Policy 5.7 - Renewable Energy
- Policy 5.9 - Overheating and Cooling
- Policy 5.10 - Urban Greening
- Policy 5.11 - Green Roofs and Development Site Environs
- Policy 5.12 - Flood Risk Management
- Policy 5.13 - Sustainable Drainage
- Policy 5.15 - Water Use and Supplies
- Policy 5.17 - Waste Capacity
- Policy 5.18 - Construction, Excavation and Demolition Waste
- Policy 5.21 - Contaminated Land
- Policy 6.1 - Strategic Approach (Transport)
- Policy 6.2 - Providing Public Transport Capacity and Safeguarding Land for Transport
- Policy 6.3 - Assessing effects of development on transport capacity
- Policy 6.9 - Cycling
- Policy 6.10 - Walking
- Policy 6.11 - Smoothing Traffic Flow and Tackling Congestion
- Policy 6.12 - Road Network Capacity
- Policy 6.13 - Parking
- Policy 7.3 - Secured by Design
- Policy 7.4 - Local Character
- Policy 7.5 - Public Realm
- Policy 7.6 - Architecture
- Policy 7.8 - Heritage Assets and Archaeology
- Policy 7.14 - Improving Air Quality

Policy 7.17 - Metropolitan Open Land
 Policy 7.19 - Biodiversity and Access to Nature
 Policy 7.21 - Trees and Woodlands
 Policy 8.2 - Planning Obligations
 Policy 8.3 - Community Infrastructure Levy

Mayor of London: Accessible London: Achieving an Inclusive Environment (SPG, 2004)

Mayor of London: Shaping Neighbourhoods - Character and Context (SPG, 2014)

Mayor of London: Sustainable Design and Construction (SPG, 2014)

Mayor of London: Social Infrastructure (SPG, 2015)

Mayor of London: Transport Strategy (2010)

Mayor of London: Climate Change Mitigation and Energy Strategy (2011)

Mayor of London: Climate Change Adaptation Strategy (2011)

Mayor of London: Central Activities Zone (SPG, 2016)

Core Strategy 2011

40. Strategic Targets Policy 1 - Achieving Growth
 Strategic Targets Policy 2 - Improving Places
 Strategic Policy 1 - Sustainable Development
 Strategic Policy 2 - Sustainable Transport
 Strategic Policy 4 - Places for Learning, Enjoyment and Healthy Lifestyles
 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

41. The Council's cabinet on 19 March 2013, as required by para 215 of the NPPF, considered the issue of compliance of Southwark Planning Policy with the National Planning Policy Framework. All policies and proposals were reviewed and the Council satisfied itself that the policies and proposals in use were in conformity with the NPPF. The resolution was that with the exception of Policy 1.8 (location of retail outside town centres) in the Southwark Plan all Southwark Plan policies are saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their degree of consistency with the NPPF.

Policy 1.1 - Access to Employment Opportunities
 Policy 1.7 - Development within Town and Local Centres
 Policy 1.11 - Arts, Culture and Tourism Use
 Policy 2.1 - Enhancement of Community Facilities
 Policy 2.5 - Planning Obligations
 Policy 3.1 - Environmental Effects
 Policy 3.2 - Protection of Amenity
 Policy 3.3 - Sustainability Assessment
 Policy 3.4 - Energy Efficiency
 Policy 3.6 - Air Quality
 Policy 3.7 - Waste Reduction
 Policy 3.9 - 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 3.28 - Biodiversity

Policy 5.1 - Locating Developments

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

Relevant Supplementary Planning Documents and Conservation Area Appraisals

42. Sustainable Design and Construction (SPD, 2009)
Sustainable Transport (SPD, 2010)
Design and Access Statements (SPD, 2007)
Section 106 Planning Obligations / Community Infrastructure Levy (SPD, 2015)
Sustainability Assessment (SPD, 2009)
Elephant and Castle (SPD & OAPF, 2012)
West Square Conservation Area Appraisal (2013)

New Southwark Plan

43. Work is under way to prepare a New Southwark Plan (NSP) which will replace the saved policies of the 2007 Southwark Plan and the 2011 Core Strategy. The Council undertook consultation on the submission version of the NSP which concluded in February 2018. It is anticipated that the plan will be adopted in 2019 following an Examination in Public (EIP). As the NSP is in draft form, it can only be attributed limited weight at present.

Draft London Plan

44. Members should also be aware that the draft New London Plan was published on 30 November 2017 and the consultation period has closed. However, given that the plan still needs to go through Examination in Public and formal adoption, it should be given limited weight at this time.

Preliminary principle of development: establishing the lawful use of the site

45. The existing lawful use of the All Saints Annexe, and indeed whether it is ancillary to the main IWML site, has not been established as part of any previous planning applications. It is necessary, therefore, to establish the existing lawful use of the site by determining whether it is a standalone planning unit or ancillary to the nearby IWML.
46. Case law confirms that incidental or ancillary uses are "*uses which are subservient to a primary use taking place within the same planning unit*". Importantly, one single planning unit may comprise physically separate and distinct areas, provided the areas are used for similar and related purposes. As such, it does not automatically follow that the All Saints Annexe site is a separate planning unit from the main IWML site purely because an area of parkland separates the two. From this basis, it is necessary to next consider whether the primary use of the Annexe is ancillary to the IWML.
47. It is known that the All Saints Annexe has functioned since the late 1980s as:
- an office for the Imperial War Museum technical and support staff (occupying approximately 60% of the total floor area);
 - as a publicly-accessible archive/library facility containing war-related materials

- (occupying approximately 40% of the total floor area), and;
 - the site of the central servers upon which both the Annexe and IWML rely (occupying a negligible percentage of the total floor area).
48. In assessing whether one use is ancillary to another, the relevant considerations as established by case law are:
1. Severability
i.e. could one use practically and viably operate and meet the basic needs of its users independently of the other?
 2. Scale
i.e. is one clearly subservient in size/floorspace to the other?
 3. Environmental impact
i.e. does the alleged ancillary use have outward effects (amenity impact, traffic effects, environmental conditions, general appearance etc.) distinctly greater or more impactful than the other?
49. Turning to Test 1, the office within the Annexe is used by technical and support staff directly serving the IWML. Thus, there is a critical interdependence between these two functions: in the event that the office was to cease operating the IWML would likely not be able to function, and vice-versa. Similarly, the IWML relies upon the servers within the Annexe building to perform its essential technological functions. Officers consider that IWML and the Annexe's library/archive could practically and viably operate independent of each other; however, because the office floorspace occupies the majority of the Annexe, it is the office use which determines the host building's primary use. As such, because the primary use of the Annexe is inseverable from IWML, Test 1 "severability" has been met.
50. The quantum of floorspace within the Annexe is less than that within the main IWML building, and thus Test 2 "scale" has been met.
51. With regard to Test 3, the Annexe site does not generate environmental impacts distinctly greater or more impactful than the main IWML building due to, amongst other things: the appointment-based nature of the archive/library facility meaning visitor numbers are controlled and relatively low at any one time; both sites accommodating similar numbers of staff; both sites having similar staff and servicing access; neither site generating any notable potential of noise or light pollution; and both buildings operating within 'daytime' hours. As such, officers consider that Test 3 "environmental impact" has been met.
52. With all three tests met, and duly recognising that this assessment is a matter of fact and degree, officers are satisfied that the lawful use of the All Saints Annexe site is ancillary to IWML (Class D1).

Principle of development

Policy Context

53. The application site is located in the Central Activities Zone (CAZ), the Elephant and Castle Opportunity Area and the Elephant and Castle Major Town Centre.
54. At the heart of the NPPF is the presumption in favour of sustainable development. Amongst the key themes in achieving sustainable development are ensuring the vitality of town centres, promoting sustainable transport, supporting a strong economy, and delivering good design.

55. The London Plan considers Opportunity Areas to be *“the capital’s major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other developments linked to existing or potential improvements to public transport.”* Policy 2.13 (Opportunity Areas and Intensification) seeks to optimise residential and non-residential output and densities within Opportunity Areas, and provide social and other infrastructure to sustain growth. In locations where an Opportunity Area Planning Framework has been adopted, the policy requires new development to conform to these strategic policy directions. Policy 4.6 (Support for and Enhancement of Arts, Culture, Sport and Entertainment) sets out the principles for maintaining the capital’s status as one of greatest world cities for culture and creativity. Examples of these principles include remedying deficiencies in existing cultural facilities and promoting development that will enhance and provide support to existing and new cultural and visitor attractions.
56. Southwark’s Core Strategy reinforces the London Plan aspirations for development in the CAZ to support London as a world class city. The CAZ and Opportunity Areas are targeted as growth areas in the borough where development will be prioritised. The Council will allow more intense development for a mix of uses in the growth areas and will ensure development makes the most of a site’s potential while protecting open space (Strategic Policy 1). Core Strategy Strategic Targets Policy 2 reflects the above London Plan targets for the opportunity areas.

Proposed D1 use of the new building within the rear yard

57. The proposed building within the rear yard would provide floorspace for IWM’s technical and support staff. This constitutes an ancillary-to-museum (Class D1) use for the reasons expanded on in earlier parts of this report. In land use terms, no issues are raised by this proposed ancillary-to-D1 use because, although a new building would be constructed, there would be no change to the site’s existing lawful use.
58. The quantum of ancillary-to-D1 floorspace within the proposed building would be less than that within the existing All Saints Annexe (which, as explained above, is to undergo a change of use). However, the space within the Annexe currently occupied by the photography and film archive is no longer required because this is to be moved to a state-of-the-art facility at Imperial War Museum Duxford. The application documents demonstrate that all remaining functions could be accommodated in the new building simply by virtue of its more efficient layout. Taking this into consideration together with the uplift and improvements to the D1 floorspace within IWML for which permission was granted earlier this year, officers consider that all existing D Class floorspace would be effectively re-provided. This is in line with the requirements of Saved Policies 1.11 and 2.1. As such, there is sound justification to release the floorspace within the existing Annexe building for an alternative appropriate use.
59. More broadly, the provision of Class D1 floorspace specifically for a purpose ancillary to and supportive of the future effective functioning of one of the Borough’s key museums would comply with a wide range of policies, most significantly: Policies 1.11 (Delivering the Strategic Vision and Objectives for London) and 4.6 (Support for and Enhancement of Arts, Culture, Sport and Entertainment) of the London Plan 2016; Strategic Policy 4 (Places for Learning, Enjoyment and Healthy Lifestyles) of the Core Strategy 2011, and; Saved Policy 1.11 (Arts, Culture and Tourism Use), 1.7 (Developments within Town and Local Centres) of the Southwark Plan 2007.

Change of use of the existing All Saints Annexe building from D1 to ‘mixed’ B1/D1

60. The proposed change of use of the Annexe to ‘mixed’ use would allow Class B1 and D1 functions to take place simultaneously and in a spatially intertwined way but would also afford the applicant the flexibility to use the entirety of the floorspace for just one

of the permitted uses without forfeiting their right to revert the space to the other use at a future time. IWM seeks this 'mixed use' because, although it is likely that the All Saints Annexe building would be leased out on a long-term basis to a future occupier for office accommodation, the flexible D1 element of the Annexe would allow IWM to re-occupy all or part of the building should they require this space in the future.

61. The proposed change of use of the Annexe from D1 (ancillary-to-museum) to B1/D1 (office/ancillary-to-museum) is acceptable because the creation of B1 floorspace, even if part of a mixed use, within the CAZ and a Major Town Centre is supported by policy. The proposed B1 use would promote jobs growth and help meet general demand for office space in this location, which benefits from the highest possible transport accessibility (PTAL) rating of 6b.
62. As explained above, although the change of use of the Annexe would potentially entail a partial or entire loss of D1 floorspace within the CAZ, this loss would be directly offset by the ancillary-to-D1 building proposed within the rear yard.
63. It is noted that, in order to support the vibrancy and vitality of the CAZ, London Plan policies 2.11 and 4.3 promote mixed use development, including housing, alongside the provision of office floorspace. The proposed development does not include a residential component. However, the London Plan allows a degree of flexibility with respect to the provision of mixed uses in the CAZ in recognition that it may not always be suitable to provide housing on-site. The Mayor's Central Activities Zone SPG contains additional guidance on maintaining an appropriate mix of uses within the CAZ, setting out the weight that should be afforded to CAZ strategic functions, such as office and culture, relative to residential. Paragraph 4.2.2 of the SPG requires the provision of residential development within the CAZ to be managed sensitively to ensure new development neither strategically constrains the overall supply of office floorspace nor fails to support and complement other important CAZ functions, such as cultural activities.
64. There would be limited scope to introduce residential into the development without increasing the scale of the buildings or compromising the layouts and functionality of the office/support floorspace. Increasing the scale of the buildings would be inappropriate given the potential impact on surrounding residential occupiers. Given the constraints of the site it would be reasonable to conclude that priority should be given to supporting the future of the IWML as an important cultural and tourist institution.
65. Whilst it is concluded that the proposed 'mixed' use of the All Saints Annexe presents no potential adverse environmental or amenity implications, it would be important to restrict the use to that linked to the IWML and prohibit other uses within Class D1 which might have different or greater local impacts. As such it is recommended that, in the event of planning permission being granted, a condition be imposed that:
 - restricts the 'D1' element to a museum use only, and;
 - removes permitted development rights afforded by the GPDO for temporary changes of D Class floorspace to uses falling within A1, A2 or A3 Classes.

Conformity with the aims of the Elephant and Castle SPD and OAPF

66. The vision set out in the Elephant and Castle Supplementary Planning Document and Opportunity Area Planning Framework (SPD and OAPF) (2012) is to realise the area's potential as an attractive central London destination by delivering excellent shopping, leisure facilities and cultural activities. Critical to this vision is the delivery of 5000 new jobs, which is to be achieved by bringing forward appropriate new development - in particular offices, hotels and small businesses - alongside improving the area's

existing cultural offering. Additionally, the SPD recognises the significant need to improve the look and feel of the area through better architecture, street forms and new public spaces.

67. The site lies within the West Square character area, in which the Elephant and Castle SPD and OAPF seeks to, amongst other things:
- Maintain and improve the existing open spaces;
 - Support improvements to IWML and its setting, and;
 - Ensure that development conserves or enhances the character and appearance of the West Square conservation area and Elliott's Row conservation area and their settings.
68. SPD6 sets out that proposals involving arts, cultural, leisure and entertainment uses which contribute towards consolidating Elephant and Castle and Walworth Road as a major town centre will be supported.
69. The proposed development would support the ability of IWM to sustain the cultural offering of IWML by providing consolidated and modern office accommodation for its workforce. In turn, this would release the 2,476 square metres of floorspace within the All Saints Annexe for a new employment use. As detailed in a later section of this Committee Report, it is considered that the development would enhance the setting of IWML and the character and appearance of the West Square Conservation Area without harming any other nearby designated heritage assets.
70. For the reasons given above, the proposed development accords with the Elephant and Castle SPD and OAPF in respect of both the broader vision and the location-specific development guidelines.

Summary

71. The proposed Class D1 and 'mixed' Class B1/D1 land uses would support an important existing cultural use while delivering new employment floorspace. These uses are appropriate in this location, which is within the CAZ and the Elephant and Castle Opportunity Area, and as such the application is acceptable in principle.

Environmental Impact Assessment

72. The European SEA Directive is transposed into UK law by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Regulations set out the circumstances under which development needs to be underpinned by an Environmental Impact Assessment (EIA). Schedule 1 of the Regulations set out a range of development, predominantly involving industrial operations, for which an EIA is mandatory. Schedule 2 lists a range of development for which an EIA might be required on the basis that it could give rise to significant environmental impacts. Schedule 3 sets out that the significance of any impact should include consideration of the characteristics of the development, the environmental sensitivity of the location and the nature of the development.
73. The development is not considered to constitute EIA development, based on a review of the scheme against both the EIA Regulations and the European Commission guidance.
74. Consideration should, nevertheless, still be given to: the scale, location or nature of development; cumulative impacts, and; whether these or anything else are likely to give rise to significant environmental impacts. This report sets out the reasons for concluding that the scale is appropriate to the site's urban setting and the users are

unlikely to give rise to any significant environmental impacts.

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

75. The site is located in area comprising residential, educational and cultural uses as well as public open space. None of the existing surrounding uses would preclude or curtail the full use of the proposed development by staff and visitors.

Impact on the amenity of adjoining occupiers

Overlooking

76. The Residential Design Standards SPD states that in order to prevent unnecessary problems of overlooking, development should achieve the following distances:
- A minimum distance of 12 metres at the front of the building and any elevation that fronts onto a highway
 - A minimum distance of 21 metres at the rear of the building.
77. It should be noted, however, that these rules apply where the 'facing' buildings are both in residential use. The proposed building would provide employment workspace ancillary to the nearby IWML, and thus would be akin to commercial use. Therefore, while the separation distances set out in the Residential Design Standards SPD are a useful guide, they can be applied with some degree of flexibility in this instance.
78. As there are no residential uses directly to the north-west or south-east of the site, the nearest dwellings are to the northeast and southwest at nos. 1 to 5 Harmsworth Mews and nos. 91-105 (odds) Brook Drive respectively. All of the Harmsworth Mews properties contain clear-glazed habitable room windows in their rear (site-facing) elevation at ground, first and second floor level. With respect to the Brook Drive properties, all eight contains one clear-glazed habitable room window within the rear (site-facing) elevation of the outrigger at first floor level. Only at nos. 95, 97 and 101 is there a clear-glazed aperture at ground floor level in the rear elevation of the outrigger. All eight Brook Drive properties contain clear-glazed openings at ground, first and/or second floor level within the outrigger side elevation and the main rear elevation.
79. The proposed development would contain glazed openings on all elevations except at upper (first floor) level on the south-west elevation of the pavilion element.
80. The planning application documents include a measured survey drawing showing the distances between the proposed building and these existing nearby residences. This drawing is provided below, with extra annotations (all in red) by the case officer identifying each of these thirteen addresses and showing two important additional dimensions.

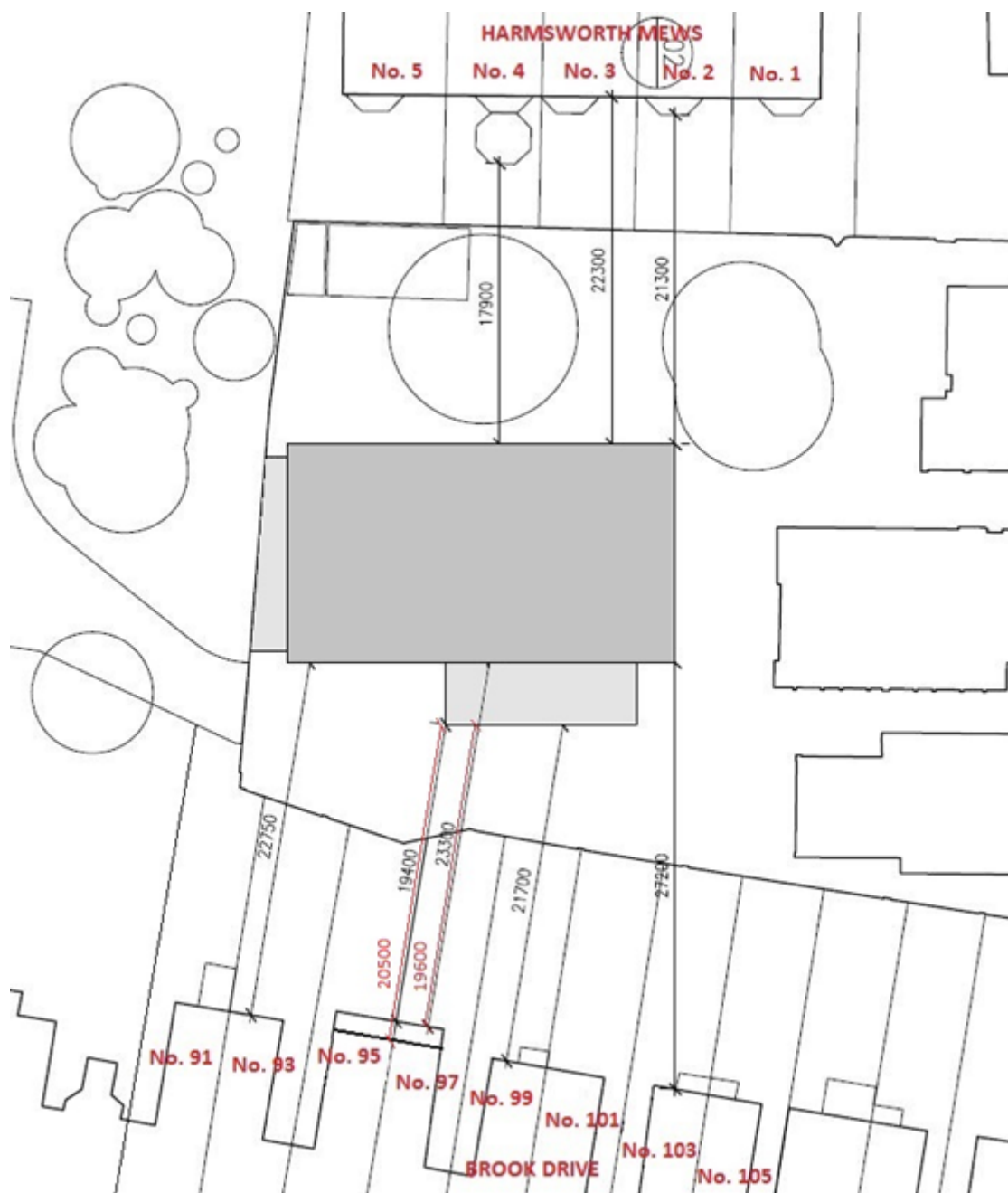


Figure 6: The proposed site layout, annotated to show the distances between the proposed building and the nearest residential properties. The three-storeyed body of the proposed building is shown in dark grey. The two-storeyed pavilion and single-storeyed extruded ground floor element are both shown in light grey.

81. With one exception, the distance between the proposed building and the Harmsworth Mews properties would exceed the 21.0 metres recommended by the Residential Design Standards SPD. The exception is the distance to the conservatory at no. 4 Harmsworth Mews, which would be 17.90 metres.
82. The conservatory is clear glazed on all elevations and its roof. From the ground floor level of the proposed building, horizontal views towards the conservatory would be screened entirely by the high boundary wall which separates the two sites. From the first floor level of the proposed building, the substantial height of the boundary wall would significantly restrict the ability of anyone stood within the development to obtain invasive views 'down' towards the conservatory. Although the views from the second floor of the building would be less obstructed than on the lower two levels, slit windows have been proposed directly opposite the conservatory to truncate the downward scope of the view and restrict its breadth. Weight should also be given to the seasonal

screening offered by the existing mature trees, the location of one of which is directly to the south of the conservatory, meaning it would stand centrally within views between the proposed development and no. 4 Harmsworth Mews.

83. In addition to physical factors, the functional use of the proposed floorspace must also be acknowledged. Firstly, as the proposed development would be a place of work, building users are unlikely to dwell at windows. Secondly, the space would be used largely by day, during which hours the surrounding residential occupiers may be at work or out of the house.
84. Recognising that the 21 metre separation distance recommended by the Residential Design Standards applies only where the 'facing' buildings are both in residential use, which is not the case in respect of this planning application, it is considered that the building design and existing features of the site would adequately limit the opportunity to overlook the conservatory at no. 4 Harmsworth Mews. With the proposed development standing more than 21.0 metres away from all other Harmsworth Mews properties, there would be no risk of the occupiers of these dwellings experiencing undue overlooking.
85. With respect to the Brook Drive properties, the diagram shows that the proposed building would, with two exceptions, be more than 21.0 metres away. The two exceptions are no. 95 Brook Drive and no. 97 Brook Drive. At no. 95 Brook Drive, the separation distance with the ground floor window would be 19.40 metres while the separation distance with the first floor window would be 20.50 metres. At no. 97 Brook Drive, the separation distance with the ground floor window would be 19.60 metres while the separation distance with the first floor window would be 20.70 metres
86. It should be noted that all of these distances are to the two-storeyed pavilion, not the three-storeyed main body of the proposed building. The shortest distance between the three-storeyed body of the proposed building and any of the Brook Drive dwellings is 22.75 metres; this is the distance to the rear elevation of no. 93 Brook Drive.
87. As no part of the main body of the proposed building would be less than 21 metres from any of the rear-facing windows at the Brook Drive dwellings, it is only the pavilion that would breach the desirable 21 metre separation distance. As the pavilion would not be glazed on its southwest-facing façade at first floor level, the distance between all upper floor windows within the proposed building and the windows opposite at Brook Drive would not be less than 21 metres. This is in conformity with the guidelines of the Residential Design Standards and demonstrates that no invasive overlooking would be achievable from the first or second floor levels of the proposed building. Although the south-west elevation of the pavilion would be glazed at ground floor level, horizontal views towards the Brook Drive rear-facing windows would be prevented by the existing common boundary wall. Additionally, a landscaping 'buffer' would span a section of the site's southwest boundary; this planting would offer an additional degree of low-level screening between the Brook Drive dwellings and the proposed building. Thus, in summary, the privacy of the occupiers of the Brook Drive properties would not be harmed.

Outlook and sense of enclosure

88. When seen in the context of the distances which would separate it from the Harmsworth Mews and Brook Drive properties, the proposed building is considered to be of a sympathetic height, mass and scale such that no undue sense of enclosure or curtailed outlook would be experienced by existing residents. To further reduce the impact on surrounding occupiers, careful consideration has been given to breaking up the elevations through multiple window openings, changes in materiality and a predominance of light-coloured yellow-grey brick. New boundary edge planting,

together with the retention of a number of existing mature trees would further lessen the building's visual prominence. While residents' outlook would change to some degree, officers are satisfied that the impact on the existing residents would not be harmful.

Daylight

89. A daylight and sunlight report has been submitted which assesses the scheme based on the Building Research Establishments (BRE) guidelines.
90. The BRE sets out the rationale for testing the daylight impacts of new development through various tests. The first is the Vertical Sky Component test (VSC), which is the most readily adopted. This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. 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 have determined that the daylight can be reduced by about 20% of the original value before the loss is noticeable.
91. The second method is the No Sky Line (NSL) or Daylight Distribution (DD) method which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of more than 20% in the area of sky visibility, daylight may be affected.
92. Assessed as part of the daylight and sunlight report due to their risk of VSC loss as a result of the works are:
 - The flats at nos. 71-89 Brook Drive;
 - Nos. 91-117 (odds) Brook Drive;
 - Nos. 2, 4 and 6 Austral Street;
 - Nos. 20, 21 and 22 West Square, and;
 - Nos. 1-5 Harmsworth Mews.
93. None of the windows at these neighbouring properties would experience a VSC reduction (as a percentage of the baseline VSC value) of 20% or more.
94. All of the properties tested for VSC loss were also tested for NSL loss. The results show that for all but two of the rooms tested the NSL loss would not exceed 20%. Where there would be a reduction of more than 20%, which is at each of the ground floor rear-facing rooms within nos. 95 and 97 Brook Drive, the reduction would be 32% and 48% respectively.



95. Figure 7: A photograph of the rear of the Brook Drive properties, highlighting the two glazed apertures which serve rooms where a reduction in NLS of more than 20% would be experienced.
96. The 32% reduction constitutes a moderate adverse impact and the 48% reduction constitutes a substantial adverse impact. However, it must be recognised that these two rooms currently benefit from an open outlook over vacant land, meaning that - notwithstanding the obstruction caused by the boundary wall - the existing area of sky visibility these rooms enjoy is uncharacteristically generous in the context of this central London location. Therefore, NSL losses will inevitably arise from any reasonable redevelopment of the yard. Taking into account the scale and modulation of the proposed development whereby the three-storeyed main body of the body is set-back behind the two-storeyed pavilion, together with the separation distance being 19.60 metres at its minimum point, it is considered that acceptable daylight levels would be retained for these two rooms, especially in light of the VSC loss at both of these glazed apertures being 16% in each case (i.e. not in breach of the 20% threshold recommended by BRE).
97. In summary, there would be no noticeable loss of VSC to any nearby dwellings as a result of the proposed development. There would be noticeable NSL losses at one ground floor room in no. 95 Brook Drive and one ground floor room in no. 97 Brook Drive. These losses are a consequence of the rooms benefitting from an unusually substantial area of sky visibility due to the yard being undeveloped at present. The level of impact is not untypical for a central London location.

Sunlight

98. The applicant's daylight and sunlight report has assessed the impact of the proposed development on the sunlight received at all windows facing within 90 degrees. The BRE guide states that nearby windows must be assessed to determine whether any of the following would be experienced:

- a reduction in sunlight to less than 25% Annual Probable Sunlight Hours (APSH), or;
 - a reduction in sunlight to less than 5% Winter Annual Probable Sunlight Hours (WAPSH) or;
 - both of the above.
99. Where any of the above occurs, if the window's resulting APSH is less than 0.8 times its former value, there may be an appreciable loss of sunlight.
100. Assessed as part of the Report due to their risk of sunlight loss are the south-facing windows at the following addresses:
- Nos. 20, 21 and 22 West Square, and;
 - Nos. 1-5 Harmsworth Mews.
101. The results show that, with the exception of the some of the glazed panes within the conservatory at no. 20 West Square, there would be no APSH or WAPSH reductions in excess of those recommended by the Building Research Establishments (BRE) guidelines.



Figure 8: Proposed site layout, showing the conservatory at no. 20 West Square edged in green.

102. With respect to the conservatory at no. 20 West Square, 44 individual glazed panes were tested, of which 17 fell short of the winter sunlight hour test. While in and of themselves such transgressions would indicate significant losses of APSH, because they combine to provide sunlight to a single room the effect would be much less noticeable to the users/occupiers. Moreover, the glazed panes where transgressions would be experienced currently receive low levels of winter sunlight due to their orientation and proximity to existing surrounding structures, the consequence of which

is that a modest loss will generate a relatively high percentage reduction. In addition to the 44 panes tested within the conservatory, there are further (more distant) openings that have not been tested, and through which the room receives natural light. There is also a 'lip' over the conservatory leaded dome, which reduces the potential for sunlight to hit the centre of the windows directly underneath this detail.

103. In summary, while some of the glazed panes within the conservatory at no. 20 West Square would experience a reduction in sunlight to less than 5% Winter Annual Probable Sunlight Hours, the majority of the glazed panes would not experience a reduction of this magnitude. The room in question is served by windows other than those in the conservatory. Taking these factors into account in the round, it is considered that the sunlight losses at this one neighbouring property would not be detrimental to the occupiers' amenity.

Overshadowing

104. An overshadowing assessment, the purpose of which is to measure and compare the level of sunlighting within gardens and open spaces before and after a proposed development, has been submitted by the applicant. The BRE guidance sets out that at least 50 percent of any garden or open space should receive no less than 2 hours of direct sun on March 21st. If, as a result of new development, the area which can receive two hours of direct sunlight on March 21st is reduced by more than 20% of its former size, the BRE guide considers this to be a transgression because the space may look more heavily overshadowed.
105. By virtue of their orientation and relationship to the application site, the properties with amenity spaces susceptible to overshadowing are:
- The flats at nos. 71-89 Brook Drive;
 - Nos. 91-117 (odds) Brook Drive;
 - Nos. 2, 4 and 6 Austral Street;
 - Nos. 20, 21 and 22 West Square, and;
 - Nos. 1-5 Harmsworth Mews.
106. The overshadowing assessment demonstrates that none of the amenity spaces at these surrounding properties would undergo a reduction of more than 20% to the area of ground which currently receives two hours of direct sunlight on March 21st.
107. In summary, the proposal would not create any undue overshadowing of neighbouring gardens and open spaces.

Noise disturbance

108. In terms of noise generation, the use of neither the proposed building nor the All Saints Annexe for D1/B1 purposes would be incompatible with the nearby residential uses. The proposed building would be used largely during standard daytime working hours with all activities except for spill-out from the canteen/café taking place within the confines of the building. A condition will be imposed requiring the spill-out tables and chairs to be brought inside the building or otherwise made unusable in the evening.
109. A condition will be imposed to ensure that the specific plant sound level shall be 10dB(A) or more below the background noise level.
110. It is inevitable that servicing vehicles will generate some low-level noise, but it is also reasonable that in the interests of residential amenity this activity be minimised certainly during night-time hours. As such, and in line with the request of the Council's

Environmental Protection Team, a condition will be imposed to restrict deliveries to the proposed building to between the hours of 08:00 and 18:00 Monday to Friday with no deliveries on Saturdays, Sundays and Bank Holidays.

Light pollution

111. The proposed building is to be used by IWM staff, and as such would be occupied in the most part during daytime hours. Throughout the building, internal light fittings would be motion-sensitive with timed shut-off. As such, on the occasion that a staff member needs to work outside normal office hours, internal lighting would be isolated solely to the area where the individual is working, the effect of which is that the entire building would not be internally lit-up. This would minimise light pollution and disturbance during hours of darkness for those dwellings which back onto the application site. It should also be noted that the operational characteristics of the existing All Saints Annexe are very similar to those of the proposed building and so the degree of change to the existing conditions and use of the site would not be pronounced.
112. In terms of external lighting, an indicative strategy is contained within the Design and Access Statement and the Landscaping Report. The strategy proposes to attach up-and-down-lighters at the heads of the ground floor windows. The down components would assist with ground surface lighting while the up components would illuminate the elevations. Lighting would also be located within the grounds of the building to provide low-level illumination for wayfinding and security purposes.
113. The Environmental Protection Team has assessed the indicative lighting strategy and has raised no issues in principle. Through the imposition of a condition, the team wishes to reserve authority over the lighting's detailed design (power and position of luminaries; light intensity contours etc.) in the interests of ensuring the surrounding residential occupiers do not suffer from light pollution or have their privacy or visual amenity affected detrimentally. These details are to be agreed and approved prior to occupation of the new building.

Odour disturbance

114. There would be no commercial kitchen facilities associated with the canteen/café space. The food sold at the canteen/café would be sandwiches, soup and the like, most of which would be prepared off-site. There is, therefore, no risk of undue odour disturbance for neighbours.
115. Should the applicant later decide to carry out large-scale food preparation on-site requiring ventilation/extraction equipment, planning permission would be required for this. Any such planning application would be determined by the Local Planning Authority with due regard to the potential odour disturbance to neighbours.
116. Neighbours have raised concerns that the proposed bin store would create odours in close proximity to Harmsworth Mews. As discussed in a later section of this report the refuse generated by the proposed development would be transferred on a daily basis to IWML. The proposed on-site store would, therefore, simply act as an occasional back-up facility and would not be used for stowing large quantities of refuse for protracted periods of time. The shelter would, in any case, be covered and secure, thereby adequately protecting surrounding occupiers from undue odour disturbance.

Quality of design

117. Saved Policy 3.13 (Urban Design) requires the height, scale and massing of buildings to be appropriate to the local context in order that they do not dominate their

surroundings inappropriately. Saved Policy 3.12 (Quality in Design) requires developments to achieve a high quality of both architectural and urban design, enhancing the quality of the built environment as well as preserving or enhancing the historic environment.

Form, height and scale

118. The proposed building would be articulated as two conjoined rectilinear volumes, one of three storeys and the other of two, but with the ground floor level of the larger volume extruded so that it extends to create the boundary wall to the park. The building's crisp form and flat roof depart from the domestic architecture which characterises the properties adjoining the site. This is considered appropriate given that the proposal would serve a non-residential function.
119. No part of the main three-storeyed body of the building would be higher than the main eaves line of the Annexe building - the top of the proposed rooftop plant would be slightly lower and the proposed parapet would be markedly lower. The proposal's flat roof helps to limit its overall height and achieve a sensitivity of scale to the existing Annexe building. The Brook Drive and Harmsworth Mews properties which border the site are also three-storeyed, but their height and scale is smaller than the Annexe building due to their residential character. The parapet of the proposed building would, nevertheless, only exceed the ridge height of these dwellings by a modest amount (approximately 1.0 metre in the case of the Harmsworth Mews properties and approximately 2.0 metres in the case of the Brook Drive properties). As such, the height and form of the proposed building strike an appropriate balance between the scale of the All Saints Annexe building and the residential dwellings to the north and south, and could not be said to dominate its context.

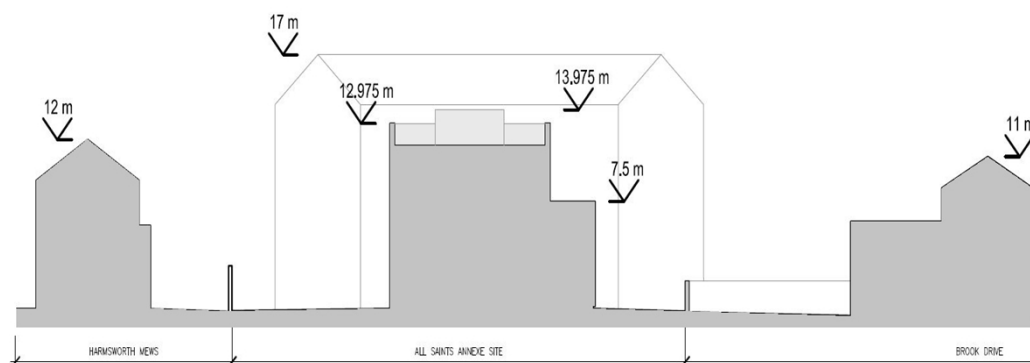


Figure 9: North-south site section, showing the proposed building in the centre of the image in relation to the All Saints Annexe (in the background), the Harmsworth Mews properties (left-hand side of image) and the Brook Drive dwellings (right-hand side of image).

120. Within almost all views across the park, the building would appear as a single, simple form due to the entrance pavilion element being out of view due to its considerable set-back from the parkside elevation of the main volume. The rooftop plant has been positioned at the far south-eastern end of the building's footprint such that it would not be visible above the raised parapet in views from the park.
121. The refuse and cycle store is the only other structure to be introduced to the rear yard. Being modestly-proportioned and single-storeyed, it would read very much as a subservient and ancillary volume to the new building. Due to being concealed by the new boundary wall, it would not be visible within wider views across the park or within the majority of views from surrounding dwellings.

122. Overall, it is considered the proposed building's form is well-conceived and its scale and massing would be proportionate to its context.

Detailed design, fenestration and materiality

123. Drawing on a number of characteristics from the local context not only in terms of materiality but also visual rhythm, the elevational treatment of the proposed building is well-resolved.
124. With respect to the main body of the building, a strong sense of verticality would be achieved through the use of slender windows, with further emphasis provided by stretches of upright brickwork between window heads and sills. The narrow recessed window openings would be interspersed by broader double-height picture windows set flush to the façade but with deep internal frames visible from the exterior. A projecting 'feature window' would wrap around the building's western corner, breaking the strongly-ordered façade and drawing the eye towards the new gateway into the site from the park.



Figure 10: A view of the building as seen from the southern corner of Geraldine Mary Harmsworth Park, showing the interrelationship of the building and the rebuilt boundary wall.

125. All elevations of the main body of the building would be faced in two types of brick. The main elevations would be finished in a grey-yellow mottled brick with a strong textural quality. A chocolate brown brick with grey fleck would be applied to the splayed window reveals to accentuate their depth; these reveals would lend a subtle dynamism to the otherwise ordered and geometric façades.



Figure 11: Physical samples of the proposed facing materials.

126. All window and door openings would be framed in slimline bronzed aluminium, the colour of which sit comfortably alongside the brown and grey-yellow of the brickwork. Solar glazing of a neutral tone would be fitted throughout, counterposing the darkness of the reveals. At ground floor level on the north-east and south-east elevations, some of the recessed bays would be faced entirely in the chocolate brown brick or fitted with bronzed aluminium louvre panels to conceal the services or back-of-house uses contained behind.
127. The façades of the two-storey entrance wing would comprise curtain walling on the ground floor and part of the first floor, externally affixed with vertically-oriented bronzed aluminium fins to match the window frames on the main body of the building. This treatment would help to visually distinguish the entrance wing from the main body, in so doing reinforcing the articulation of the building as two rectilinear volumes sat side-by-side, without appearing discordant. The entrance pavilion would be of striking design, providing a suitable focal point for those entering the site from Geraldine Mary Harmsworth Park.
128. The new wall running along the site's boundary to the Park would be constructed in the chocolate brown brick. Where the new boundary wall meets the proposed building, it would become part of the building itself, enclosing the staff welfare and canteen areas. A series of windows would punctuate the wall; these would wrap over into a glazed roof that would span back to the main structural frame of the building. Cleverly, this allows for the ground floor level accommodation to discreetly extend up to the boundary line (in so doing facilitating natural surveillance of an area of the park dogged by antisocial behaviour) without resulting in all three storeys of the building standing hard against the boundary.
129. A new pedestrian/vehicle gate is proposed in replacement of and slightly further to the south of the existing solid gate. Sitting within and rising to the same height as the new boundary wall, the gate is to be formed of vertical slats which pick up on the materials and rhythm of the entrance wing; these slats would allow views both into and out of the site. This would form a high-quality section of boundary treatment and help the development read as an integral part of the park setting.
130. Given the function and modest scale of the cycle and refuse store, it is considered that the proposed timber cladding would achieve an acceptable quality of design. The stretch of green screen on the store's south-west elevation would soften the structure's appearance, which is welcomed.
131. Critical to the success of the building's design is achieving the depth of architectural expression, the contrast of the materials and the crispness of the geometry. Detailed construction drawings and materials samples have been submitted during the course of the application process which demonstrate that the desired effect will be achieved.
132. In summary, officers are satisfied that the key views and sensitive local receptors - listed buildings and conservation areas - have been considered in the articulation of the façade and the detailed design and materiality. The resolution is well-considered, high quality and suitably restrained.

External realm

133. The proposed surface treatment, planting mix and new trees would secure a high quality external realm. The retention of the existing mature trees within the northern part of the site is a significant benefit of the scheme and will help the proposed building sit more comfortably within its environs.

134. The short stretch of access road within Geraldine Mary Harmsworth Park which the application proposes to realign would be finished in the same pavers as the external realm within the application site. This is a high quality surfacing treatment that would subtly help strengthen the connection between the site and the parkland while still preserving the openness of the landscape.

Impact on the West Square Conservation Area and the setting of nearby heritage assets

Significance of the site and its contribution to heritage assets and/or their setting

135. The All Saints Annexe is a fine late 19th century, three-storey building with raised basement located in the West Square Conservation Area, the appraisal for which identifies the Annexe as a key unlisted building. The Elephant and Castle OAPD and SDP also lists the All Saints Annexe on its 'Schedule of buildings which have the potential to be locally Listed'.
136. The Annexe is of an Italianate style with ended bays set forward, a pedimented Ionic porch at the head of the central flight of steps, and prominent chimney stacks. It is within views along Austral Street that the Annexe can be seen most prominently. The valuable role the building plays within the wider Conservation Area derives principally from the imposing presence of its front façade within the streetscene. The front of the building is comparatively much better preserved than the rear elevation.
137. The rear of the building, which is open to views across Geraldine Mary Harmsworth Park, has been the subject of piecemeal alterations historically including lean-to extensions and the installation of air conditioning units. The yard is surfaced in a mixture of paving and gravel, and currently accommodates two portakabins and several shipping containers. The portakabins - which, despite never having been given planning consent, have gained lawfulness through the passage of time and consequently form part of the West Square Conservation Area - are simple structures that neither play a noteworthy townscape role nor make a positive contribution to the designated heritage asset. In its current state, the area to the rear of the Annexe building fails to contribute positively to the Conservation Area.
138. There are a number of Grade II listed buildings within the vicinity of the site, the closest of which are IWML and nos. 9 to 25 West Square. The yard can be seen in the same context as the IWML and thus forms part of the setting of this designated heritage asset. Not within any meaningful public view, however, can the yard and the West Square listed properties be seen together. This is due to the visual obstruction caused by other non-listed West Square dwellings and the All Saints Annexe building itself (the outward appearance of which is to remain unchanged as part of the proposed developments).
139. Immediately to the south-east of the site is the Elliott's Row Conservation Area. Although the front façade of the All Saints Annexe building forms part of the setting of the Elliott's Row Conservation Area, the Annexe screens the rear yard to such an extent that the yard is not a feature within the setting of this nearby Conservation Area.
140. The other two nearby conservation areas, both of which are in the Borough of Lambeth, are the Walcot Conservation Area and the Lambeth Walk and China Walk Conservation Area. These are separated from the site by low- and mid-rise housing, the vast majority of which is terraced. This tightly-knit stock, together with the relatively narrow and contained character of the local streetscape as well as the considerable tree coverage to the rear of the application site, means it is not possible even to

glimpse either the yard or Annexe within the same context as the Lambeth Walk and China Walk Conservation Area. Although the All Saints Annexe features within southwards views along Austral Street towards the northern edge of the Walcot Conservation Area, the rear yard (where all development entailing a material change to the appearance of the site is proposed by this planning application) does not form part of the context of the Walcot Conservation Area. Thus, there is no need to further consider whether the setting of this piece of nearby protected historic townscape would be impacted.

141. From historic maps it would appear that the boundary wall between the Annexe and the park once formed part of the curtilage to King Edwards School rather than the former Bedlam Hospital (now IWML). For this reason, the boundary wall is not considered to be curtilage listed. This wall is in a poor condition and no objection is raised to its replacement.
142. In summary, the proposed development would affect only the following designated heritage assets or their setting:
 - the West Square Conservation Area, and;
 - IWML.

Assessment of impact on the West Square Conservation Area

143. Paragraph 129 of the NPPF 2018 requires Local Planning Authorities to identify and assess the particular significance of any heritage asset that may be affected by a proposal. The particular significance of this conservation area derives from it being a notable example of high quality late Georgian and mid-19th century townscape, containing a number of important public buildings. The centrepiece is the Imperial War Museum, surrounded by the open space of the Mary Harmsworth Park. The proposed development would fulfil the requirement of conserving or enhancing the heritage asset by introducing to this currently underused site a modestly-proportioned and carefully-configured new building that would sit comfortably among the surrounding buildings and trees. The detailed design pays reference to the adjacent built form and subtly interfaces with the park, while still employing a contemporary architectural style and using complementary materials.



Figure 12: A view across Geraldine Mary Harmsworth Park towards the proposed building.

144. Strategic Policy 12 (Design and Conservation) of Core Strategy 2011 requires development 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. To achieve this, new development must conserve or enhance the significance of Southwark's heritage assets, their settings and wider historic environment, including conservation areas. The design of this proposal - with its crisp form, well-balanced proportions, modest height and a robust and contextually-sensitive material palette - achieves a standard that is considered to be acceptable for such a sensitive site.
145. Saved Policy 3.16 (Conservation Areas) requires development within conservation areas to preserve or enhance the character or appearance of the area, use high quality materials and not introduce design details or features that are out of character with the area. For the reasons given in the preceding paragraphs, the proposal is considered to be in conformity with these three policies such that the result would be an enhancement of the character and appearance of the West Square Conservation Area.
146. The proposed development of the rear yard would necessitate the removal of the portakabins. As explained in a preceding section of this report, these modern structures neither play a noteworthy townscape role nor make a positive contribution to the designated heritage asset. Their removal from the site would, therefore, have a neutral or beneficial impact.

Assessment of impact on the setting of IWML

147. A considerable stretch of parkland would separate the proposed building from IWML and, within the relatively limited viewframe where it would be possible to appreciate both buildings together, the development would appear subservient in scale. Within such views, a large number of mature trees would stand in-between the two buildings; due to their proximity to the application site, these trees would seasonally screen the development from view to a large degree.

148. For these reasons, it is considered that the proposed development would not impact on the setting of IWML.

Impact on views in the London View Management Framework

149. The application site lies within the background of LVMF Protected View 23.A, which is the view towards Westminster from the bridge over the Serpentine at Hyde Park. The threshold plane within which the site is situated is 55-60 metres. The maximum height of the proposed development would be 13.975 metres, which is significantly lower than the threshold. The building would, therefore, be subordinate to the Westminster World Heritage site and would not be visible in this Townscape View.

Impact on the nearby Metropolitan Open Land

150. The application site includes a small area of open space at the southern tip of Geraldine Mary Harmsworth Park. Within this parcel of land, it is proposed to realign the existing private access route and introduce new planting. There would be no new structures.
151. Despite the majority of the park forming part of Metropolitan Open Land under adopted policy, this particular parcel remains outside of the designation. While the parcel is proposed to be MOL “new open space”, as specified in Annex 11 (Open Space Designations) of the Proposed Submission Version [Feb 2018] of the New Southwark Plan, this is not due to be adopted until 2019 following submission and Examination in Public. In any case, the realignment of the access road (to be finished in a high-quality surfacing treatment) and the informal yet rich new planting would preserve the openness of the parkland and protect its landscape features, in line with the aims of all relevant adopted policy as well as the proposed submission version of the New Southwark Plan

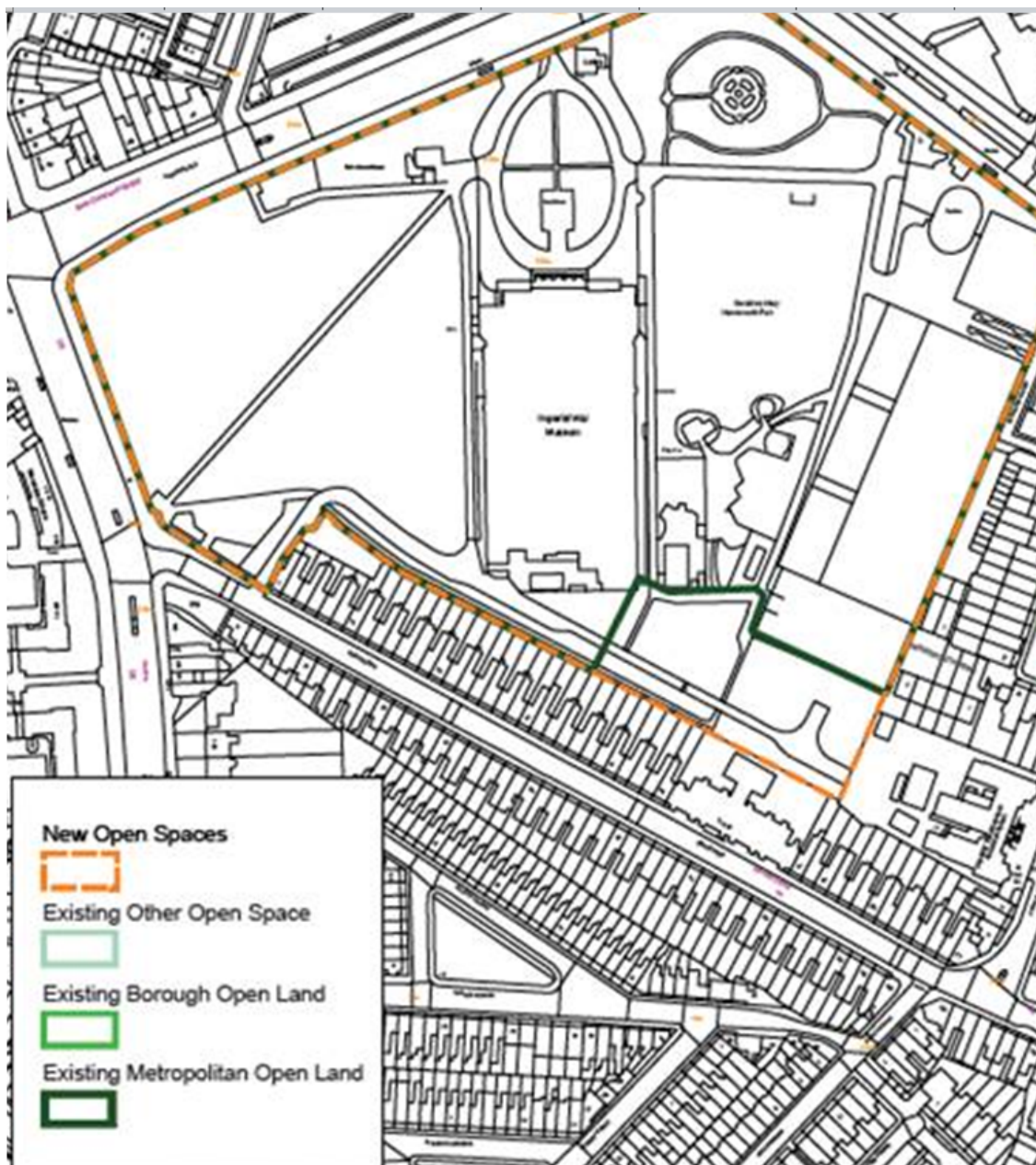


Figure 13: Map showing the adopted open space designations outlined in various shades of green, and the proposed “new open space” designation of the New Southwark Plan outlined in orange. The portion of the park which forms part of the application site lies at the southernmost tip of the parkland, outside of the areas edged in green.

Transport, highways and servicing matters

Trip generation and encouraging sustainable travel

152. The application site benefits from extremely good public transport accessibility. The Transport Assessment prepared by the applicant concluded that the Annexe and the new building together would generate seven additional two-way vehicle trips during peak hours, all of which would derive from the new ‘mixed’ D1/B1 use of the existing All Saints Annexe. The Assessment predicted that no net gain in trips would be generated by the new building within the rear yard because the highway network already hosts all of these trips. The Council’s Transport Planning team has conducted its own independent assessment by interrogating comparable sites’ travel surveys, from which it was concluded that the Annexe and the new building together would generate eleven and thirteen additional two-way vehicle movements in the morning and evening peak hours respectively. Despite the Transport Planning team’s trip

generation figures being higher than the applicant's, the figure is still minimal such that there would be no noticeable adverse impact on the prevailing vehicular traffic on the adjoining roads.

153. In any event, the applicant has proposed travel plan measures encompassing the provision of cycling facilities and dissemination of public transport information to staff. A travel plan survey undertaken by the applicant in 2017 revealed that most of the staff currently use sustainable travel modes, with only one person travelling by car. Moreover, the analysis of the traffic accidents occurring in the vicinity of this development in the last five years by the applicant's consultants has shown there to be no specific pattern of accidents that would warrant any ameliorative action.
154. In summary, the anticipated level of public transport trips would not have a detrimental impact on existing public transport services. This takes account of the extensive provision of rail, underground and bus routes operating in the local vicinity, alongside the mitigation measures proposed by the applicant within their Travel Plan, the implementation of which will be secured by condition.

Refuse storage and collection arrangements

155. Presently, a waste provider collects recycling and waste from the front of the All Saints Annexe (i.e. on Austral Street) twice a week. Separate waste and recycling collections for IWML take place from a loading bay area on Lambeth Road six days a week.
156. The applicant's Delivery and Servicing Plan details how the recycling and residual waste generated by the proposed new building would be stored and collected. The intention is for all waste and refuse to be placed onto a cart and wheeled from the building through Geraldine Mary Harmsworth Park to IWML on a daily basis. This route would be entirely off the public highway. Once brought to IWML, the waste would be amalgamated with the refuse and recycling generated by IWML, and thereafter collected from the loading bay area on Lambeth Road. Any waste waiting to be transferred from the new building to IWML could be temporarily stored within the dedicated refuse compartment of the proposed single-storey timber structure.
157. As such, the current collections associated with IWM on Austral Street would cease once the new building is operational. Refuse generated by any future tenants of the All Saints Annexe could, and in all likelihood would, continue to be collected from Austral Street. The quantum of refuse would not materially differ from the quantum generated by the current activities within the premises.
158. The Council's Transport Planning team has deemed the Delivery and Servicing Plan to be sound in respect of refuse storage and collection, noting that while the proposals would generate a greater volume of waste and recycling to be collected from Lambeth Road, the change would not be significant such that the likelihood of needing to increase the current frequency of refuse collection services would be very low.

Site servicing

159. With the exception of deliveries to the proposed canteen/café, all deliveries and servicing would take place via the gated private road that runs through Geraldine Mary Harmsworth Park and ultimately opens onto Brook Drive. In the event of an emergency, fire tenders and other emergency vehicles would also use this route to gain access to the proposed building. The applicant's Delivery and Servicing Plan details how the largest of these vehicles (a fire/pumping engine) would be able to enter, exit and manoeuvre on the site without obstruction. The Transport Planning team are satisfied with the content with the strategy and require no further information in respect of vehicle routing via the park.

160. Deliveries to the proposed canteen/café would arrive via the existing accessway which runs along the north-eastern side of the All Saints Annexe. The tracking diagrams within the Delivery and Servicing Plan evidence that, after having entered the rear yard via the accessway, a medium sized (5.2 metre long) delivery van could manoeuvre on site and exit onto the public highway in forward gear. These diagrams show that the swept path would not conflict with any of the three retained trees.
161. The proposed building within the rear yard is expected to generate nine fewer weekly delivery and servicing movements within Geraldine Mary Harmsworth Park than those associated with the All Saints Annexe in its current use, which is welcomed.
162. There is potential for the future occupier of the All Saints Annexe to generate up to nine additional delivery and servicing trips. The Transport Planning team is satisfied that these vehicles would be accommodated within the Annexe's forecourt (i.e. off the public highway) and thus would not significantly impact traffic flows on Austral Street.

Car parking

163. The proposal is located within the Central Activities Zone (CAZ) and a Controlled Parking Zone (CPZ). Given the excellent accessibility to public transport, the car free nature of the development is appropriate. One on-site disabled parking space would be created, as per the requirements of the London Plan, on a portion of the All Saints Annexe forecourt but accessed off the alleyway rather than from the forecourt itself. This space would be provided with an Electric Vehicle Charging Point, in line with London Plan Policy 6.13.

Cycle parking and promoting safer cycling

164. A cycle parking shelter with 20 'Sheffield' stands, providing a total of 40 cycle parking spaces for use by IWM staff of the new building would be provided for the new building. The storage would be secure, weatherproof and accessible and is this compliant with the London Plan 2016 and Saved Policy 6.3 of the Southwark Plan 2007. The provision of these stands, to the specification and in the locations shown on the application documents, will be secured by condition.

Highway works

165. The access/egress to the site for delivery vehicles is to be via the existing crossovers on Austral Street and Brook Street, and so the proposal necessitates no public highway works.
166. The Highways Authority has considered the application documentation, including the Construction Management Plan, and is satisfied that there would be no impact on the public highways. The Highways Authority has suggested that, in the event of planning permission being granted, Informatives be attached to the decision notice requesting the undertaking of a joint condition survey and the carrying out of any damages to the highway within the vicinity of the development as a result of the construction works.

Flood risk and sustainable urban drainage

Flood risk, flood resilience and the water environment

167. The Environment Agency was consulted on the application and recommended that conditions be imposed in the event of permission being granted pertaining to previously unidentified contamination. These conditions have been recommended due to the associated potential implications on the water environment. No issues were

raised in respect of flood risk to users of the proposed building or users of the Annexe in its new 'mixed' Class B1/D1 use.

Sustainable urban drainage

168. The Council's Flood Risk Management team was consulted on the application and raised no objections to the application. A condition requiring the development to be implemented in accordance with the approved drainage strategy is included in the draft decision notice.

Trees and landscaping

169. The three mature trees on site at present would be retained. Additionally, a replacement tree is proposed to the south-west corner of the site in accordance with Condition 1 of a recent tree works consent (the reference number for which is 17/AP/4228) which permitted the removal of an existing tree because it was posing structural problems for the boundary wall.
170. The applicant has supplied an arboricultural survey, an arboricultural impact assessment, a tree strategy and bedding details which the Council's Urban Forester has assessed and considers acceptable.
171. With respect to the proposed landscaping, the planting bed against the boundary wall shared with the Brook Drive properties would contain a mix of shrubs and three new trees. There would also be perimeter planting around the base of the proposed building. In addition to a detailed landscape strategy, the applicant has supplied a planting plan (specifying planting species and their locations), details of the beds and a maintenance strategy. The Council's Urban Forester has assessed this information and considers it to be acceptable. A condition is recommended to ensure that all soft landscaping is carried out and maintained in accordance with the approved details.

Biodiversity and ecology

172. The proposal incorporates a biodiverse roof, details of the construction of which were supplied to the Council's Ecologist. The Ecologist has deemed these details acceptable, noting that the blanket would be placed underneath the photovoltaic array, a strategy which has been shown to optimise photovoltaic performance. The Ecologist has recommended the imposition of a condition requiring the biodiverse roof to be laid out in accordance with the plans and an agreed mix of species.
173. The proposal incorporates bird and bat boxes, the proposed specification of which has been approved by the Council's Ecologist. Constructing the development with these features incorporated will be a condition of consent.

Environmental matters

Land contamination

174. There are no land contamination concerns but a precautionary condition is recommended to ensure remediation is carried out should previously unidentified contamination be found during development.

Archaeology

175. The application site is not within an Archaeological Priority Zone (APZ), but is within an area where archaeological remains should be anticipated. The site was partially archaeologically excavated in 1998 by the Museum of London Archaeology Service.

These works revealed a post medieval cultivation soil, circa 1 metre below the present ground level.

176. The applicant has submitted an archaeological Desk Based Assessment which determines, as far as is reasonably possible, the location, extent, date, character, condition, significance and quality of any surviving archaeological remains liable to be threatened by the proposed redevelopment. There is sufficient information to establish that, subject to conditions, the development is not likely to cause harm. These conditions will cover archaeological evaluation, archaeological mitigation, archaeological foundation design and archaeological reporting site work.

Construction impacts

177. A Construction Environmental Management Plan (CEMP) and a Construction Traffic Management Plan (CTMP) have been submitted in support of the applicant.
178. Due to the pre-fabricated nature of the proposed building, construction will be 80% completed off-site, the effect of which is that on-site construction works and waste removal would be minimised. The modular units would be installed over a two week period, minimising disruption to IWML and local residents. Construction vehicles are to be routed along A roads, entering the site via the private access road through Geraldine Mary Harmsworth Park. As such, the use of residential streets would be avoided as far as possible.
179. Through the course of the application process, the CEMP has been amended at the request of the Highways Authority and the Council's Environmental Protection and Transport Planning teams. Its content is now to the satisfaction of all three consultees. A condition will be imposed to ensure the construction works are carried out in accordance with the CEMP, in its final amended form, as well as the CTMP. This will ensure minimised neighbour amenity, environmental and transport/highways impacts.

Sustainability

Carbon emissions and renewable technologies

180. London Plan Policy 5.2 requires a reduction in carbon emissions of 35% below the Part L 2013 target. There is no requirement for non-residential developments, such as the building proposed on the All Saints Annexe rear yard, to be carbon neutral.
181. A detailed energy assessment has been submitted as part of the application to demonstrate how the targets for carbon dioxide emissions reduction are to be met. Overall, the new building would achieve a carbon saving of 35.23%, thereby meeting the policy requirement. This has been achieved through passive design and a high-specification building fabric, together with the provision of a high-energy air source heat pump and the installation of photovoltaic panels. The energy strategy is, therefore, acceptable and it is recommended that a condition be imposed to secure the details for the development.
182. The proposed change of use of the All Saints Annexe does not trigger a requirement to achieve carbon reductions.

BREEAM

183. A BREEAM pre-assessment has been submitted as part of the application documents, with the proposed building achieving a score of 74.38%, which translates to an 'Excellent' rating. A condition is recommended to achieve "excellent". This will ensure the works take sufficient consideration of sustainability.

184. As the change of use of the All Saints Annexe would not involve any floorspace uplift, this element of the planning application does not need to meet any BREEAM rating

Air Quality

185. London Plan policy 7.14 states that development proposals should minimise exposure to poor air quality, being at least 'air quality neutral'. This is particularly the case where developments are located within designated Air Quality Management Areas (AQMA) as is the case with this proposal. Southwark Plan policy 3.6 advises that planning permission will not be granted where a development leads to a reduction in air quality.
186. The CEMP has considered potential dust emissions during construction and the attendant impact on air quality. A number of mitigation measures are proposed during the construction phase to alleviate any dust and particulates which may impact on local air quality. With respect to the air quality impacts of the development once operational, there would be an insignificant increase in vehicle movements to the site due to the 'car-free' nature of the scheme. The Travel Plan sets out measures to encourage IWM staff to use more sustainable transport methods.
187. The Council's Environmental Protection team has assessed the air quality information and is satisfied that the mitigation measures proposed would achieve air quality neutrality.

Community engagement

188. The applicant's statement of community involvement (contained within the Planning Statement) details the consultation undertaken before the full application was submitted. These community engagement efforts included:
- Four public exhibitions on 21.11.2017, 27.02.2018, 07.03.2018 and 11.04.2018 (for which invitations were sent by post to over 150 residents)
 - A public briefing with site walk-around on 20/02/2018
 - A questionnaire survey
189. The Statement of Community Involvement also explains how much of the feedback was used to inform the design evolution of the proposal.
190. Notwithstanding that there are no statutory requirements in relation to Community Involvement, this is considered to be an adequate effort to engage with those affected by the proposals. As part of its statutory requirements, the Council sent letters to all residents, displayed site notices in the vicinity, and issued a press notice publicising the planning application. Adequate efforts have, therefore, been made to ensure the community has been given the opportunity to participate in the planning process. The responses received are summarised later in this report.

Planning obligations

191. The site is not within the Central London Crossrail S.106 contribution area, and thus the proposed development does not incur a Crossrail contribution.
192. The application has been assessed with regard to the Council's Section 106 and CIL SPD and it has been resolved that no obligations are required. All necessary mitigation is either captured within the application or to be achieved through compliance with or discharge of planning conditions.

Community Infrastructure Levy

Southwark CIL

193. The building located within the rear yard would not trigger a payment towards funding additional infrastructure under the London Borough of Southwark revised Community Infrastructure Levy charging schedule (December 2017).

Mayoral CIL

194. A payment of £52,220.47 would be required under the Mayor of London's Community Infrastructure Levy at £35 per square metre.
195. Owing to being a charity, IWM is eligible to seek relief from this liability under regulations 43 to 48 of the The Community Infrastructure Levy Regulations 2010 (as amended). Exemption will be granted subject to the development being deemed to meet the relief criteria.

Consultation responses: Members of the public

Total number of representations:	32				
In favour:	0	Against:	31	Neutral:	0
Petitions in favour:	0	Petitions against:	1		

196. The material planning considerations raised by the consultation responses are as follows.

197. Principle of development:

- Increasing office space would not be in line with the guidance set out in the Elephant and Castle OAPDF and SPD.
- Moving the archives from the All Saints Annexe to a location outside London would represent a cultural and societal loss for the city.
- The D1 use of the new building, if not restricted to an ancillary-to-museum use, could allow for the full range of D1 uses to take place within the building.
- There is a lack of clarity as to how many members of staff would be accommodated within the new building.

198. Design quality and impact on heritage assets:

- The overall height and scale of the proposed building would be excessive.
- The proposed building would be harmful to the setting of nearby listed and key unlisted buildings.
- The proposed building would be harmful to the West Square Conservation Area, and erode its residential character.
- The proposed building would not be in conformity with the guidelines set out in the Conservation Area Appraisal.
- The proposed building would not be subservient in scale to the All Saints Annexe.
- The fenestration intensifies the height and scale of the proposed building.
- The proposed building could have incorporated a basement as a way of reducing its overall height but this option has not been pursued by IWM.
- The pre-fabricated nature of the proposed building would fail to achieve an acceptable quality of design, given the Conservation Area designation.
- The solar controlled glazing would reflect heat and create glare.

- The original Bethlehem boundary wall is considered to be curtilage listed, and thus its proposed removal would be unacceptable.

199. Neighbour amenity impacts during construction:

- Risk of noise, dust and dirt during the construction period.
- Risk of works being undertaken outside of normal working hours.

200. Neighbour amenity impacts post-completion:

- Loss of daylight and sunlight to nearby properties.
- Overshadowing of outdoor amenity spaces at nearby properties.
- Increased sense of enclosure and diminished quality of outlook for nearby properties.
- Overlooking of neighbouring properties.
- Light pollution, and associated health impacts, generated by the illumination of the building during night-time hours.
- Noise disturbance generated by employees coming and going, delivery vehicles manoeuvring on site, the operations of the plant, the use of the cycle/refuse store, and chiller/extraction equipment which may be placed within the food preparation area associated with the canteen/café.
- Odour disturbance generated by the proposed refuse store and employees smoking outdoors.
- Vermin and pest disturbance due to the proposed refuse store.
- For those local residents who do not have a private garden, there would be a reduction in the availability of the nearby West Square garden due to increased use by IWM staff force and/or employees of the future tenant of the All Saints Annexe.

201. Transport, highways, deliveries and servicing matters:

- The proposed routing of delivery and servicing and refuse collection vehicles would be harmful to residential amenity.
- There would be an increase in the number of vehicle trips as a result of the development, especially in respect of the change-of-use of the Annexe.
- The local highways network would be placed under increased parking pressure.
- Routing vehicles through the park is unacceptable.
- Hours between which deliveries and servicing can take should be restricted.

202. Impacts on ground conditions:

- The new proposed trees would cause subsidence and/or structural issues at nearby properties.
- The proposed building would cause subsidence and/or structural issues at nearby properties.

203. Impacts on the nearby Metropolitan Open Land and Site of Importance for Nature Conservation:

- The loss of the yard as an 'open space buffer' between the MOL and the All Saints Annexe would be harmful to the MOL.
- Routing vehicles through the park for servicing/access purposes is contrary to MOL policy.

204. Impacts on trees and local ecology:

- The loss of plants and shrubs from within the site would cause ecological harm.
- The development and associated works on the park boundary would cause harm to woodland wildlife.
- The incursion of the proposed building into the root protection zone of the three trees on the northern part of the site would place the trees at risk.

205. Other matters:

- Flood risk would increase as a result of the proposed building within the rear yard.
- The Flood Risk Assessment does not properly assess the flood risk for the proposed B1/D1 use of the Annexe, the concern with which is that any D1 use other than ancillary-to-museum (such as a crèche or health centre) could pose flood risks to staff and visitors.
- The application drawings are inaccurate, in particular the measured drawing showing distances to neighbours' properties.
- The potential for weekend and evening working will create security risks because the site will not have closed-off access during these times.
- The final proposed has not taken into account the views and concerns raised by local residents during the pre-application consultation.

206. All of these matters have been addressed in the assessment parts of this Report. Other matters were raised by the public consultation process, such as IWM's financial motives for the development, but these do not constitute material planning considerations so cannot be taken into account in the determination of this application.

Consultation responses: Statutory consultees

207. The following consultation responses were received from statutory consultees. Although other statutory consultees were consulted, these did not respond.

Environment Agency

208. No objections. Conditions relating to contamination and foundation design recommended.

Historic England

209. No objections. Instructed the LPA to proceed with determination of the applications as seen fit.

Natural England

210. No objections. Instructed the LPA to proceed with determination of the applications as seen fit.

London Underground

211. No objections, no comments.

Conservation Area Advisory Group (CAAG)

212. CAAG was generally supportive of the proposal. The group felt the design and the detailing were promising but the two-tone brick cladding was potentially distracting but

would have preferred a single tone brick with deep angled reveals. The Group felt the landscape was underplayed and dominated by hard surfaces. The adjacency of the park provides an opportunity to introduce a complementary landscape with green roofs and trees to screen the new building from the residential properties nearby.

Note: a green roof and further details of the planting scheme were submitted subsequent to and partly in response to the views expressed by CAAG.

Community impact statement

213. 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 connect to that characteristic
 - Take steps to meets 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.

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

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

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

Consultations

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

Human rights implications

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

219. This application has the legitimate aim of providing a new ‘mixed’ Class B1/D1

building together with the change of use of an existing building, and all associated works. 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.

Conclusion on planning issues

220. The proposed land uses, comprising new Class D1 floorspace and 'mixed' Class D1/B1 repurposed floorspace, would support an important existing cultural use while delivering new employment floorspace. These uses are appropriate in this location, which benefits from the highest possible public transport accessibility and is within both the Central Activities Zone and an Opportunity Area.
221. No undue overlooking would arise for the Brook Drive properties to the south of the site because on neither of the proposed building's two upper floors would there be any glazing which would create direct views towards an opposite window at a distance of less than 21 metres. Although the building would not be located more than 21 metres from a conservatory at one of the Harmsworth Mews properties to the north of the site, the ability of anyone stood within the development to obtain invasive views 'down' towards the conservatory would be restricted. Recognising that the 21 metre separation distance recommended by the Residential Design Standards applies only where the 'facing' buildings are both in residential use, which is not the case in respect of this planning application, it is considered that the building design and existing features of the site would adequately limit the opportunity to overlook the conservatory at no. 4 Harmsworth Mews.
222. With respect to daylight impacts, while there would be noticeable NSL losses at two rooms within properties adjoining the site, these losses are a consequence of the rooms benefitting from an unusually substantial area of sky visibility due to the yard being undeveloped at present. The resulting NSL levels are, in any case, not untypical for a central London location. Furthermore, there would be no VSC losses at either of these rooms (or at any other affected room) in excess of the BRE recommendations. On balance, it is considered that the daylight level within the affected rooms would not noticeably change.
223. In terms of sunlight impacts, a conservatory at a property adjoining the site would experience an APSH reduction by more than the BRE recommendations. However, these losses would affect only some of the glazed panes in the conservatory, leaving the majority of the panes with a complaint APSH level. As these glazed panes combine to provide sunlight to a single room the effect would be much less noticeable to the users/occupiers. Thus, while the impact is recognised, it is considered that the sunlight losses at this one neighbouring property would not be detrimental to the occupiers' amenity.
224. The proposed building within the rear yard would achieve a high quality of design that would preserve the character and appearance of the West Square Conservation Area and the setting of the nearby Grade II listed IWML. Well-detailed and incorporating a high quality palette of materials, the building would relate sensitively to the historic context while also maintaining the openness and character of Geraldine Mary Harmsworth Park, most of which is designated Metropolitan Open Land.
225. The trip generation, servicing and refuse arrangements, cycle storage and travel plan are all acceptable. Adequate measures are in place to protect the existing mature trees on site, while the high-quality scheme of hard and soft landscaping —to include some planting along the park boundary— is welcomed.
226. In line with the requirements of the NPPF, the Council has applied the presumption in

favour of sustainable development. The proposed development would accord with sustainable principles and would make efficient use of the land to deliver a high quality development that is in accordance with the Council's aspirations for the area. It is therefore recommended that Members grant permission, subject to conditions as set out in the attached draft decision notice.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/1357-A Application file: 18/AP/1577 Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 5535 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	Patrick Cronin – Planning Officer	
Version	Final	
Dated	25 September 2018	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance & Governance	No	No
Strategic Director, Environment and Social Regeneration	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
Date final report sent to Constitutional Team	27 September 2018	

APPENDIX 1**Consultation undertaken****Site notice date:** 25/05/2018**Press notice date:** 17/05/2018**Case officer site visit date:** 25/05/2018**Neighbour consultation letters sent:** 16/05/2018**Internal services consulted:**

Ecology Officer
 Economic Development Team
 Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]
 Flood and Drainage Team
 HIGHWAY LICENSING
 Highway Development Management
 Highways Development Management - CMPs
 Housing Regeneration Initiatives
 Parks & Open Spaces
 Waste Management

Statutory and non-statutory organisations consulted:

EDF Energy
 Environment Agency
 Historic England
 London Borough of Lambeth
 London Underground Limited
 Metropolitan Police Service (Designing out Crime)
 Natural England - London Region & South East Region
 Thames Water - Development Planning
 The Georgian Group
 The Victorian Society

Neighbour and local groups consulted:

13 Orient Street London SE11 4SR	29 West Square London SE11 4SP
47 West Square London SE11 4SP	44 West Square London SE11 4SP
34 West Square London SE11 4SP	10 Hayles Street London SE11 4SS
6 Temple West Mews West Square SE11 4TJ	12 Hayles Street London SE11 4SS
7 Temple West Mews West Square SE11 4TJ	7 Orient Street London SE11 4SR
Flat 21 71-89 Brook Drive SE11 4TR	3 Orient Street London SE11 4SR
Flat 22 71-89 Brook Drive SE11 4TR	5 Orient Street London SE11 4SR
139b Brook Drive London SE11 4TQ	2 Hayles Street London SE11 4SS
19 Orient Street London SE11 4SR	20 Hayles Street London SE11 4SS
Flat 8 71-89 Brook Drive SE11 4TR	18 Hayles Street London SE11 4SS
Flat 9 71-89 Brook Drive SE11 4TR	14 Hayles Street London SE11 4SS
Flat 7 71-89 Brook Drive SE11 4TR	16 Hayles Street London SE11 4SS
Flat 5 71-89 Brook Drive SE11 4TR	49 West Square London SE11 4SP
Flat 6 71-89 Brook Drive SE11 4TR	50 West Square London SE11 4SP
4 Temple West Mews West Square SE11 4TJ	48 West Square London SE11 4SP
5 Temple West Mews West Square SE11 4TJ	45 West Square London SE11 4SP
3 Temple West Mews West Square SE11 4TJ	46 West Square London SE11 4SP
1 Temple West Mews West Square SE11 4TJ	1 Orient Street London SE11 4SR
2 Temple West Mews West Square SE11 4TJ	15 Orient Street London SE11 4SR
Flat 23 71-89 Brook Drive SE11 4TR	53 West Square London SE11 4SP
Flat 37 71-89 Brook Drive SE11 4TR	51 West Square London SE11 4SP

Flat 38 71-89 Brook Drive SE11 4TR
 Flat 36 71-89 Brook Drive SE11 4TR
 Flat 34 71-89 Brook Drive SE11 4TR
 Flat 35 71-89 Brook Drive SE11 4TR
 7 Hedger Street London SE11 4ST
 9 Hedger Street London SE11 4ST
 5 Hedger Street London SE11 4ST
 1 Hedger Street London SE11 4ST
 3 Hedger Street London SE11 4ST
 Flat 27 71-89 Brook Drive SE11 4TR
 Flat 28 71-89 Brook Drive SE11 4TR
 Flat 26 71-89 Brook Drive SE11 4TR
 Flat 24 71-89 Brook Drive SE11 4TR
 Flat 25 71-89 Brook Drive SE11 4TR
 Flat 32 71-89 Brook Drive SE11 4TR
 Flat 33 71-89 Brook Drive SE11 4TR
 Flat 31 71-89 Brook Drive SE11 4TR
 Flat 29 71-89 Brook Drive SE11 4TR
 Flat 30 71-89 Brook Drive SE11 4TR
 Flat 4 71-89 Brook Drive SE11 4TR
 Flat A 109 Brook Drive SE11 4TU
 Flat B 109 Brook Drive SE11 4TU
 Flat B 107 Brook Drive SE11 4TU
 Flat B 99 Brook Drive SE11 4TU
 Flat A 107 Brook Drive SE11 4TU
 Flat B 115 Brook Drive SE11 4TU
 Flat A 111 Brook Drive SE11 4TU
 Flat A 115 Brook Drive SE11 4TU
 Flat A 113 Brook Drive SE11 4TU
 Flat B 113 Brook Drive SE11 4TU
 Flat B 55 Brook Drive SE11 4TU
 Flat B 57 Brook Drive SE11 4TU
 Flat B 53 Brook Drive SE11 4TU
 Flat B 49 Brook Drive SE11 4TU
 Flat B 51 Brook Drive SE11 4TU
 Flat B 67 Brook Drive SE11 4TU
 Flat B 69 Brook Drive SE11 4TU
 Flat B 65 Brook Drive SE11 4TU
 Flat B 59 Brook Drive SE11 4TU
 Flat B 61 Brook Drive SE11 4TU
 Flat B 111 Brook Drive SE11 4TU
 Flat 1 71-89 Brook Drive SE11 4TR
 Flat 17 71-89 Brook Drive SE11 4TR
 Flat 16 71-89 Brook Drive SE11 4TR
 Flat 14 71-89 Brook Drive SE11 4TR
 Flat 15 71-89 Brook Drive SE11 4TR
 Flat 2 71-89 Brook Drive SE11 4TR
 Flat 3 71-89 Brook Drive SE11 4TR
 Flat 20 71-89 Brook Drive SE11 4TR
 Flat 18 71-89 Brook Drive SE11 4TR
 Flat 19 71-89 Brook Drive SE11 4TR
 143b Brook Drive London SE11 4TQ
 145b Brook Drive London SE11 4TQ
 137b Brook Drive London SE11 4TQ
 125b Brook Drive London SE11 4TQ
 131b Brook Drive London SE11 4TQ
 Flat 12 71-89 Brook Drive SE11 4TR
 Flat 13 71-89 Brook Drive SE11 4TR
 Flat 11 71-89 Brook Drive SE11 4TR
 147b Brook Drive London SE11 4TQ
 Flat 10 71-89 Brook Drive SE11 4TR
 Second Floor And Third Floor Flat 15 Austral Street SE11 4SJ
 Second Floor Flat 28 West Square SE11 4SP
 Ground Floor Flat 9 Austral Street SE11 4SJ
 Ground Floor Flat 15 Austral Street SE11 4SJ
 Ground Floor Flat 28 West Square SE11 4SP
 Southwark College West Square SE11 4SN
 Charlotte Sharman Primary School West Square SE11 4SN
 Second Floor Flat 9 Austral Street SE11 4SJ
 Third Floor Flat 28 West Square SE11 4SP
 22b Hayles Street London SE11 4SS
 First Floor Flat 15 Austral Street SE11 4SJ
 22a Hayles Street London SE11 4SS
 Flat 1 95 Brook Drive SE11 4TU
 14 West Square London SE11 4SN
 First Floor And Second Floor Flat 45 Brook Drive SE11 4TU
 Ground Floor And First Floor Flat 45 Brook Drive SE11 4TU
 Basement Flat 25 West Square SE11 4SP
 52 West Square London SE11 4SP
 24 West Square London SE11 4SN
 34 Hayles Street London SE11 4SS
 Flat A 117 Brook Drive SE11 4TU
 Sports Facility Geraldine Mary Harmsworth Park SE1 6ER
 Garden House 44 West Square SE11 4SP
 Flat B 117 Brook Drive SE11 4TU
 Ground Floor Flat 30 West Square SE11 4SP
 Third Floor Flat 30 West Square SE11 4SP
 Second Floor And Third Floor Flat 1 Austral Street SE11 4SJ
 Ground Floor Flat 1 Austral Street SE11 4SJ
 First Floor Flat 1 Austral Street SE11 4SJ
 First Floor And Second Floor Flat 22 West Square SE11 4SN
 Imperial War Museum Annex Austral Street SE11 4SJ
 Basement And Ground Floor Flat 22 West Square SE11 4SN
 Flat 1 103 Brook Drive SE11 4TU
 6 Austral Street London SE11 4SJ
 7 Austral Street London SE11 4SJ
 4 Austral Street London SE11 4SJ
 27 Austral Street London SE11 4SJ
 3 Austral Street London SE11 4SJ
 23 West Square London SE11 4SN
 21 West Square London SE11 4SN
 20 West Square London SE11 4SN
 17 Austral Street London SE11 4SJ
 Flat 2 103 Brook Drive SE11 4TU
 Imperial War Museum Lambeth Road SE1 6HZ
 23 Austral Street London SE11 4SJ
 25 Austral Street London SE11 4SJ
 19 Austral Street London SE11 4SJ
 2 Austral Street London SE11 4SJ
 Flat 2 5 Austral Street SE11 4SJ
 Flat 3 5 Austral Street SE11 4SJ
 Flat 1 5 Austral Street SE11 4SJ
 Flat C 11 Austral Street SE11 4SJ
 Flat C 13 Austral Street SE11 4SJ
 125a Brook Drive London SE11 4TQ
 131a Brook Drive London SE11 4TQ
 11c West Square London SE11 4SN
 11a West Square London SE11 4SN
 11b West Square London SE11 4SN
 6 Harmsworth Mews London SE11 4SQ
 7 Harmsworth Mews London SE11 4SQ
 5 Harmsworth Mews London SE11 4SQ
 3 Harmsworth Mews London SE11 4SQ
 4 Harmsworth Mews London SE11 4SQ
 Flat B 11 Austral Street SE11 4SJ
 Flat B 13 Austral Street SE11 4SJ
 Flat A 13 Austral Street SE11 4SJ
 Basement Flat 28 West Square SE11 4SP
 Flat A 11 Austral Street SE11 4SJ
 137a Brook Drive London SE11 4TQ
 Flat A 65 Brook Drive SE11 4TU
 Flat A 67 Brook Drive SE11 4TU
 Flat A 61 Brook Drive SE11 4TU
 Flat A 57 Brook Drive SE11 4TU
 Flat A 59 Brook Drive SE11 4TU
 Flat B 105 Brook Drive SE11 4TU
 Flat B 43 Brook Drive SE11 4TU
 Flat A 99 Brook Drive SE11 4TU
 Flat A 69 Brook Drive SE11 4TU
 147a Brook Drive London SE11 4TQ
 Flat A 105 Brook Drive SE11 4TU
 145a Brook Drive London SE11 4TQ
 139a Brook Drive London SE11 4TQ
 143a Brook Drive London SE11 4TQ
 Flat A 53 Brook Drive SE11 4TU
 Flat A 55 Brook Drive SE11 4TU
 Flat A 51 Brook Drive SE11 4TU
 Flat A 43 Brook Drive SE11 4TU
 Flat A 49 Brook Drive SE11 4TU
 2 Harmsworth Mews London SE11 4SQ
 46 Hayles Street London SE11 4SX
 48 Hayles Street London SE11 4SX
 44 Hayles Street London SE11 4SX
 40 Hayles Street London SE11 4SX
 42 Hayles Street London SE11 4SX
 56 Hayles Street London SE11 4SX

First Floor Flat 28 West Square SE11 4SP
 First Floor Flat 9 Austral Street SE11 4SJ
 63 Brook Drive London SE11 4TU
 Top Floor 97 Brook Drive SE11 4TU
 6 West Square London SE11 4SN
 12 West Square London SE11 4SN
 7 West Square London SE11 4SN
 8 West Square London SE11 4SN
 19 West Square London SE11 4SN
 Flat 2 Two Eagles House SE11 4TQ
 Flat 3 Two Eagles House SE11 4TQ
 Flat 1 Two Eagles House SE11 4TQ
 16 West Square London SE11 4SN
 15 West Square London SE11 4SN
 17 Hedger Street London SE11 4ST
 19 Hedger Street London SE11 4ST
 15 Hedger Street London SE11 4ST
 11 Hedger Street London SE11 4ST
 13 Hedger Street London SE11 4ST
 8 Orient Street London SE11 4SR
 18 West Square London SE11 4SN
 6 Orient Street London SE11 4SR
 2 Orient Street London SE11 4SR
 4 Orient Street London SE11 4SR
 Flat 4 Two Eagles House SE11 4TQ
 6a Austral Street London SE11 4SJ
 141a Brook Drive London SE11 4TQ
 141b Brook Drive London SE11 4TQ
 Ground Flat 97 Brook Drive SE11 4TU
 First Floor Flat 97 Brook Drive SE11 4TU
 Flat 3 95 Brook Drive SE11 4TU
 93 Brook Drive London SE11 4TU
 Flat 2 95 Brook Drive SE11 4TU
 11 West Square London SE11 4SN
 13 West Square London SE11 4SN
 119d Brook Drive London SE11 4TQ
 119a Brook Drive London SE11 4TQ
 119b Brook Drive London SE11 4TQ
 129a Brook Drive London SE11 4TQ
 129b Brook Drive London SE11 4TQ
 21b Austral Street London SE11 4SJ
 17 West Square London SE11 4SN
 21a Austral Street London SE11 4SJ
 37 West Square London SE11 4SP
 38 West Square London SE11 4SP
 36 West Square London SE11 4SP
 33 West Square London SE11 4SP
 35 West Square London SE11 4SP
 42 West Square London SE11 4SP
 43 West Square London SE11 4SP
 41 West Square London SE11 4SP
 39 West Square London SE11 4SP
 40 West Square London SE11 4SP
 26 West Square London SE11 4SP
 27 West Square London SE11 4SP
 3 West Square London SE11 4SN
 9 West Square London SE11 4SN
 31 West Square London SE11 4SP
 32 West Square London SE11 4SP
 30 West Square London SE11 4SP
 58 Hayles Street London SE11 4SX
 54 Hayles Street London SE11 4SX
 50 Hayles Street London SE11 4SX
 52 Hayles Street London SE11 4SX
 28 Hayles Street London SE11 4SS
 30 Hayles Street London SE11 4SS
 26 Hayles Street London SE11 4SS
 24 Hayles Street London SE11 4SS
 8 Hayles Street London SE11 4SS
 38 Hayles Street London SE11 4SX
 6 Hayles Street London SE11 4SS
 32 Hayles Street London SE11 4SS
 4 Hayles Street London SE11 4SS
 60 Hayles Street London SE11 4SX
 101 Brook Drive London SE11 4TU
 135 Brook Drive London SE11 4TQ
 149 Brook Drive London SE11 4TQ
 1 Harmsworth Mews London SE11 4SQ
 91 Brook Drive London SE11 4TU
 47 Brook Drive London SE11 4TU
 68 Hayles Street London SE11 4SX
 119 Brook Drive London SE11 4TQ
 66 Hayles Street London SE11 4SX
 62 Hayles Street London SE11 4SX
 64 Hayles Street London SE11 4SX
 133 Brook Drive London SE11 4TQ
 127 Brook Drive London SE11 4TQ
 121 Brook Drive London SE11 4TQ
 123 Brook Drive London SE11 4TQ
 78 Brook Drive SE11 4TS
 80 Brook Drive SE11 4TS
 82 Brook Drive SE11 4TS
 44 Brook Drive SE11 4TS
 46 Brook Drive London SE11 4TS
 50 Brook Drive SE11 4TS
 52 Brook Drive SE11 4TS
 54 Brook Drive SE11 4TS
 56 Brook Drive SE11 4TS
 64 Brook Drive London SE11 4TS
 66 Brook Drive SE11 4TS
 60 Brook Drive SE11 4TS
 84 Brook Drive London SE11 4TS
 157 Kennington Road London SE11 6SF
 7 Orient Street London SE11 4SR
 31 West Square London SE11 4SP
 12 West Square London SE11 4SN
 125 High Street Sevenoaks TN13 1UT
 95 Brook Drive SE11 4TU
 7 Orient Street London SE11 4SR
 20, West Square London SE11 4SN
 1c Austral Street London SE11 4SJ
 6 Harmsworth Mews London SE11 4SQ
 4 Harmsworth Mews London SE11 4SQ
 4 Harmsworth Mews London SE11 4SQ
 2 Harmsworth Mews West Square SE11 4SQ
 C/O Phillips Planning Services Ltd
 7 Orient Street London SE11 4SR
 C/O 1 Harmsworth Mews London SE11 4SD

Re-consultation: n/a

APPENDIX 2**Consultation responses received****Internal services**

As discussed in the main body of the Report.

Statutory and non-statutory organisations

Environment Agency
 Historic England
 London Underground Limited
 Natural England - London Region & South East Region

Neighbours and local groups

C/O 160 Tooley Street
 C/O 1 Harmsworth Mews London SE11 4SD [PETITION]
 Email representation
 Email representation
 First Floor Flat 97 Brook Drive SE11 4TU
 1 Harmsworth Mews London SE11 4SQ
 1 Harmsworth Mews London SE11 4SQ
 1c Austral Street London SE11 4SJ
 12 West Square London SE11 4SN
 125 High Street Sevenoaks TN13 1UT
 2 Harmsworth Mews West Square SE11 4SQ
 2 Harmsworth Mews West Square SE11 4SQ
 20 West Square London SE11 4SN
 20 West Square London SE11 4SN
 21 West Square London SE11 4SN
 3 Harmsworth Mews London SE11 4SQ
 3 Harmsworth Mews London SE11 4SQ
 3 Harmsworth Mews London SE11 4SQ
 38 West Square London SE11 4SP
 4 Harmsworth Mews London SE11 4SQ
 4 Harmsworth Mews London SE11 4SQ
 4 Harmsworth Mews London SE11 4SQ
 4 Harmsworth Mews London SE11 4SQ
 49 West Square London SE11 4SP
 5 Harmsworth Mews London SE11 4SQ
 6 Harmsworth Mews London SE11 4SQ
 6 Harmsworth Mews London SE11 4SQ
 7 Orient Street London SE11 4SR
 7 Orient Street London SE11 4SR
 7 Orient Street London SE11 4SR
 95 Brook Drive SE11 4TU
 13 West Square SE11 4SN

RECOMMENDATION

This document shows the case officer's recommended decision for the application referred to below.
This document is not a decision notice for this application.

Applicant	Imperial War Museums	Reg. Number	18/AP/1577
Application Type	Full Planning Application	Case	TP/1357-A
Recommendation	Grant permission	Number	

Draft of Decision Notice

Planning Permission was GRANTED for the following development:

Construction of a three-storey building for Class D1 use (to provide offices and staff accommodation ancillary to the Imperial War Museum) within the rear yard, to incorporate rooftop plant and photovoltaics, together with the change of use of the existing All Saints Annexe building from Class D1 (ancillary to the museum) use to a mixed Class B1 (office) / Class D1 (ancillary to museum) use. The development will include hard and soft landscaping improvements, the provision of a cycle and refuse store, the provision of one accessible car parking space at the front of the All Saints Annexe building, the rebuilding of the site's boundary wall to Geraldine Mary Harmsworth Park, the realignment of the access road into the site from the Park, demolition of the portakabins and other associated works.

At: ALL SAINTS ANNEXE (IMPERIAL WAR MUSEUM) AND LAND TO THE REAR, AUSTRAL STREET, LONDON, SE11 4SJ

In accordance with application received on 03/05/2018

and Applicant's Drawing Nos.

Existing plans

- 2740-JW-00-ZZ-DR-A-0002 - 'Block Plan'
- 2740-JW-00-ZZ-DR-A-0001 - 'Location Plan'
- AS-BP-FL-4-001 - 'Floor Layout'
- AS-BP-FL-3-001 - 'Floor Layout'
- AS-BP-FL-2-001 - 'Floor Layout'
- AS-BP-FL-1-001 - 'Floor Layout'
- AS-BP-FL-0-001 - 'Floor Layout'

Proposed plans, elevations and sections

- 2740-JW-00-ZZ-DR-A-4003 - 'Proposed Section C-C'
- 2740-JW-00-ZZ-DR-A-4002 - 'Proposed Section B-B'
- 2740-JW-00-ZZ-DR-A-4001 - 'Proposed Section A-A'
- 2740-JW-00-ZZ-DR-A-4000 - 'Proposed Site Sections'
- 2740-JW-00-ZZ-DR-A-3008 - 'Boundary Wall and Gates Proposed and Existing'
- 2740-JW-00-ZZ-DR-A-3007 - 'Proposed West Elevation Typical Bay'
- 2740-JW-00-ZZ-DR-A-3006 - 'Proposed South Elevation Typical Bay'
- 2740-JW-00-ZZ-DR-A-3005 - 'Proposed North Elevation Typical Bay'
- 2740-JW-00-ZZ-DR-A-3004 - 'Proposed East Elevation'
- 2740-JW-00-ZZ-DR-A-3003 - 'Proposed South Elevation'
- 2740-JW-00-ZZ-DR-A-3002 - 'Proposed West Elevation'
- 2740-JW-00-ZZ-DR-A-3001 - 'Proposed North Elevation'
- 2740-JW-00-ZZ-DR-A-3000 - 'Proposed Site Elevations'
- 2740-JW-00-03-DR-A-1003 - 'Proposed Roof Plan'
- 2740-JW-00-ZZ-DR-A-1002 - 'Proposed Second Floor Plan'
- 2740-JW-00-ZZ-DR-A-1001 - 'Proposed First Floor Plan'
- 2740-JW-00-ZZ-DR-A-1000 - 'Proposed Ground Floor Plan'
- 2740-JW-00-ZZ-DR-A-0003 - 'Proposed Site Plan'
- EDC22-DT-201 - Rev C - 'Wall & Gate Details'
- EDC22-GA-205 - Rev A - 'Biodiversity Green Roof Details'
- EDC22-DT-202 - Rev B - 'Bin Store & Cycle Store Details'
- 2876-SK-141 - Rev P01 - 'Typical Bay Elevation External Materials'
- 2876-SK-142 - Rev P01 - 'Typical Bay Elevation Pavilion External Materials'

- EDCC22-GA-100 - Rev M - 'General Arrangement Plan'
- 201 - S2.B - Rev B - 'Structural Details'
- 101 - S2.B - Rev B - 'Foundation GA'

Design, heritage, trees, landscaping and archaeological documentation

- 'Design and Access Statement' - Revision 1 [dated 03.05.2018, produced by Jestico and Whiles]
- 'Archaeological Desk-Based Assessment' [dated May 2018, produced by MOLA]
- 'Imperial War Museum - All Saints Site, Arboricultural Survey' - V.2.0 [dated 18.10.2017 and produced by The Ecology Consultancy]
- 'Arboricultural Impact Assessment' [dated May 2018, produced by the Ecology Consultancy]
- 'Tree Strategy' [dated May 2018, produced by Design ID]
- 'Landscaping Strategy' [dated May 2018, produced by Eden Development Consultants Ltd]
- EDCC22-GA-101 - Rev C - 'Hardworks Plan'
- EDCC22-GA-203 - Rev C - 'Hard & Soft Details'
- EDC22-GA-102 - Rev C - 'Softworks Plan'
- EDC22-SP01 - Rev D - 'Outline Landscape Specification' [dated 21/09/2018, produced by Eden Development Consultants Ltd]
- 2876-SK-139 - Rev P02 - 'Distances to surrounding buildings and heights'

Environmental and sustainability information

- 'Daylight and Sunlight Report' [dated May 2018, produced by CPMC Surveying]
- 'Energy Statement' [dated May 2018, produced by Delap and Waller]
- 'Ground Investigation Report' [dated May 2018, produced by Land Science]
- 'Noise Survey and Impact Assessment' [dated May 2018, produced by dbX Acoustics]
- 'Waste Management Strategy' [dated May 2018, produced by IWM]
- PURY-EP900YSLM-A1 - 'Heat Recovery Outdoor Unit' [Air Conditioning Specification by Mitsubishi Electric]

Flood risk and drainage documentation

- 'Flood Risk Assessment' [dated May 2018, produced by Carson Consulting]
- 'Site Drainage Strategy' [dated May 2018, produced by Design ID]

Transport documentation

- 'Imperial War Museum, Parkside, Construction Traffic Management Plan' [undated, produced by Local Transport Projects]
- 'Construction and Environmental Management Plan' - Rev D [dated 15/08/2018, produced by REDS10]
- 'Delivery and Servicing Plan' [dated May 2018, produced by Local Transport Projects]
- 'Transport Assessment' [dated May 2018, produced by Local Transport Projects]
- 'Travel Plan' [dated May 2018, produced by Local Transport Projects]
- 'Modal Split Derivation' [undated, produced by Local Transport Projects]

Other documentation

- 'Planning Statement' [revised and received 01/08/2018, produced by The Planning Lab]
- 'IWM Park Side | response to public comments (ap ref: 18/AP/1577)' [dated 26.07.2018, produced by the Planning Lab]

Other items

'Photograph of the material samples' [received 13/09/2018]

Subject to the following thirty-two conditions:

Time limit for implementing this permission and the approved plans

- 1 The development hereby permitted shall not be carried out otherwise than in accordance with the following approved plans:

2740-JW-00-ZZ-DR-A-4003	- 'Proposed Section C-C'
2740-JW-00-ZZ-DR-A-4002	- 'Proposed Section B-B'
2740-JW-00-ZZ-DR-A-4001	- 'Proposed Section A-A'
2740-JW-00-ZZ-DR-A-4000	- 'Proposed Site Sections'
2740-JW-00-ZZ-DR-A-3008	- 'Boundary Wall and Gates Proposed and Existing'
2740-JW-00-ZZ-DR-A-3007	- 'Proposed West Elevation Typical Bay'
2740-JW-00-ZZ-DR-A-3006	- 'Proposed South Elevation Typical Bay'
2740-JW-00-ZZ-DR-A-3005	- 'Proposed North Elevation Typical Bay'
2740-JW-00-ZZ-DR-A-3004	- 'Proposed East Elevation'
2740-JW-00-ZZ-DR-A-3003	- 'Proposed South Elevation'

2740-JW-00-ZZ-DR-A-3002 - 'Proposed West Elevation'
 2740-JW-00-ZZ-DR-A-3001 - 'Proposed North Elevation'
 2740-JW-00-ZZ-DR-A-3000 - 'Proposed Site Elevations'
 2740-JW-00-03-DR-A-1003 - 'Proposed Roof Plan'
 2740-JW-00-ZZ-DR-A-1002 - 'Proposed Second Floor Plan'
 2740-JW-00-ZZ-DR-A-1001 - 'Proposed First Floor Plan'
 2740-JW-00-ZZ-DR-A-1000 - Proposed Ground Floor Plan
 2740-JW-00-ZZ-DR-A-0003 - Proposed Site Plan
 EDC22-DT-201 - Rev C - 'Wall & Gate Details'
 EDC22-GA-205 - Rev A - 'Biodiversity Green Roof Details'
 EDC22-DT-202 - Rev B - 'Bin Store & Cycle Store Details'
 201 - S2.B - Rev B - 'Structural Details'
 2876-SK-141 - Rev P01 - 'Typical Bay Elevation External Materials'
 2876-SK-142 - Rev P01 - 'Typical Bay Elevation Pavilion External Materials'

Reason:

For the avoidance of doubt and in the interests of proper planning.

- 2 The development hereby permitted shall be begun before the end of three years from the date of this permission.

Reason

As required by Section 91 of the Town and Country Planning Act 1990 as amended.

Pre-commencement condition(s) - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before any work in connection with implementing this permission is commenced.

- 3 ARCHAEOLOGICAL WATCHING BRIEF

Before commencement of any work hereby authorised other than the change-of-use of the existing All Saints Annexe, the applicant shall secure the implementation of a programme of archaeological watching brief works in accordance with a written scheme of investigation, which shall be submitted to and approved in writing by the Local Planning Authority.

The watching brief should have the capacity to include full archaeological excavation if important archaeological remains are encountered during the works. The written scheme of investigation for the watching brief should include additional background analysis to inform the evidence base, in the absence of a DBA.

Reason:

In order that the details of the programme of works for the archaeological mitigation works are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site in accordance with: the National Planning Policy Framework 2018; Strategic Policy 12 (Design and Conservation) of the Core Strategy 2011; Saved Policy 3.19 (Archaeology) of the Southwark Plan 2007.

- 4 Before any work hereby authorised begins details of the foundation works including changes to levels to be used in the construction of this development, showing how the roots will be protected, shall be submitted to and approved in writing by the Local Planning Authority. Details shall include the use of trial holes or trenches to check for the position of roots. The development shall not be carried out otherwise than in accordance with any such approval given. All works shall adhere to BS5837: Trees in relation to demolition, design and construction (2012) and National Joint Utility Group, Guidance 10 - Guidelines For The Planning, Installation And Maintenance Of Utility Apparatus In Proximity To Trees (Issue 2).

Reason

To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with The National Planning Policy Framework 2012 Parts 7, 8, 11 & 12 and policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of The Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity.

- 5 Prior to works commencing, including any demolition, an Arboricultural Method Statement including an Arboricultural Survey shall be submitted to and approved in writing by the Local Planning Authority.

a) A pre-commencement meeting shall be arranged, the details of which shall be notified to the Local Planning Authority for agreement in writing prior to the meeting and prior to works commencing on site, including any demolition, changes to ground levels, pruning or tree removal.

b) A detailed Arboricultural Method Statement showing the means by which any retained trees on or directly adjacent to the site are to be protected from damage by demolition works, excavation, vehicles, stored or stacked building supplies, waste or other materials, and building plant, scaffolding or other equipment, shall then be submitted to and approved in writing by the Local Planning Authority. The method statements shall include details of facilitative pruning specifications and a supervision schedule overseen by an accredited arboricultural consultant.

c) Cross sections shall be provided to show surface and other changes to levels, special engineering or construction details and any proposed activity within root protection areas required in order to facilitate demolition, construction and excavation.

The existing trees on or adjoining the site which are to be retained shall be protected and both the site and trees managed in accordance with the recommendations contained in the method statement. Following the pre-commencement meeting all tree protection measures shall be installed, carried out and retained throughout the period of the works, unless otherwise agreed in writing by the Local Planning Authority. In any case, all works must adhere to BS5837: (2012) Trees in relation to demolition, design and construction and BS3998: (2010) Tree work - recommendations.

If within the expiration of 5 years from the date of the occupation of the building for its permitted use any retained tree is removed, uprooted is destroyed or dies, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time, as may be specified in writing by the Local Planning Authority.

Reason

To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with The National Planning Policy Framework 2012 Parts 7, 8, 11 & 12 and policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of The Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity.

Commencement of works above grade - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before any work above grade is commenced. The term 'above grade' here means any works above ground level.

6 BREEAM CERTIFICATION

Before commencement of any above ground work relating to the Class D1 building within the rear yard, an independently verified BREEAM report to achieve a minimum BREEAM 'Excellent' rating in accordance with the requirements of the BREEAM Guide (or such national measure of sustainability that replaces that scheme) shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any such approval given.

Before the first occupation of the development hereby permitted, a certified Post Construction Review (or other verification process agreed with the local planning authority) shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed standards at (a) have been met.

Reason:

To ensure the proposal complies with: The National Planning Policy Framework 2012; Strategic Policy 13 (High Environmental Standards) of The Core Strategy 2011, and; Saved Policies 3.3 (Sustainability) and 3.4 (Energy Efficiency) of the Southwark Plan 2007.

7 Before any above grade work hereby authorised begins, detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings (including cross sections, surfacing materials of any parking, access, or pathways layouts, materials and edge details), shall be submitted to and approved in writing by the Local Planning Authority. The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use.

The planting, seeding and/or turfing shall be carried out in the first planting season following completion of building works and any trees or shrubs that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the same size and species in the first suitable planting season. Planting shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction and BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf).

Reason

So that the Council may be satisfied with the details of the landscaping scheme in accordance with The National Planning Policy Framework 2012 Parts 7, 8, 11 & 12 and policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of The Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity.

Pre-occupation condition(s) - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before the building(s) hereby permitted are occupied or the use hereby permitted is commenced.

8 ELECTRIC VEHICLE CHARGING POINT AND PARKING SCHEME DETAILS

Before the first occupation of the Class D1 building within the rear yard hereby approved, details of the installation (including location and type) of one electric vehicle charger point to serve the proposed disabled parking space adjacent to the Austral Street entrance to the rear yard, together with a parking scheme, shall be submitted to and approved in writing by the Local Planning Authority.

The electric vehicle charger point shall be installed and made available for use prior to occupation of the Class D1 building within the rear yard, and shall thereafter be maintained as such in perpetuity.

Reason:

To encourage more sustainable travel in accordance with: The National Planning Policy Framework 2018; Policy 6.13 (Parking) of the London Plan 2016; Strategic Policy 2 (Sustainable Transport) of The Core Strategy 2011, and; Saved Policies 3.1 (Environmental Effects) and 5.2 (Transport Impacts) of the Southwark Plan 2007.

Compliance condition(s) - the following condition(s) impose restrictions and/or other requirements that must be complied with at all times once the permission has been implemented.

9 COMPLIANCE WITH DELIVERY AND SERVICING PLAN

All measures detailed in the Delivery and Servicing Plan [dated May 2018, produced by Local Transport Projects] submitted with the application, including all vehicle routing and refuse collection arrangements, shall be implemented at the relevant stage(s) of the development and, where applicable, shall be adhered to throughout the lifetime of the development unless otherwise approved in writing by the local planning authority.

Reason:

In order to minimise the impact on the local highway network in accordance with: The National Planning Policy Framework 2018; Strategic Policy 2 (Sustainable Transport) of The Core Strategy 2011, and; Saved Policy 5.2 (Transport Impacts) of the Southwark Plan 2007.

10 COMPLIANCE WITH TRAVEL PLAN

All measures detailed in the Travel Plan [dated May 2018, produced by Local Transport Projects] submitted with the application, including the appointment of an appropriately experienced and qualified Travel Plan Coordinator (TPC), shall be implemented at the relevant stage(s) of the development and, where applicable, shall be upheld throughout the lifetime of the development unless otherwise approved in writing by the local planning authority.

Reason:

In order that the use of non-car based travel is encouraged in accordance with: The National Planning Policy Framework 2012; Strategic Policy 2 (Sustainable Transport) of The Core Strategy 2011, and; Saved Policies 5.2 (Transport Impacts), 5.3 (Walking and Cycling) and 5.6 (Car Parking) of the Southwark Plan 2007.

11 RESTRICTION ON USE WITHIN D1 USE CLASS: THE ALL SAINTS ANNEXE

Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order and any associated provisions of the Town and Country Planning General Permitted Development Order (including any future amendment or enactment of those Orders) the Class D1 element of the 'mixed' Class D1/B1 use hereby permitted in respect of the All Saints Annexe shall not include any Class D1 use other than ancillary-to-museum.

Reason:

In granting this permission the Local Planning Authority has had regard to the special circumstances of this case and wishes to have the opportunity of exercising control over any subsequent alternative use in accordance with: the National Planning Policy Framework 2018; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan 2007.

12 RESTRICTION ON USE WITHIN D1 USE CLASS: THE BUILDING WITHIN THE REAR YARD

Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order and any associated provisions of the Town and Country Planning General Permitted Development Order (including any future amendment or enactment of those Orders) the Class D1 use hereby permitted in respect of the building in the rear yard shall not include any Class D1 use other than ancillary-to-museum.

Reason:

In granting this permission the Local Planning Authority has had regard to the special circumstances of this case and wishes to have the opportunity of exercising control over any subsequent alternative use in accordance with: the National Planning Policy Framework 2018; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan 2007.

13 COMPLIANCE WITH FOUNDATION DETAILS

The construction of the site foundations shall be carried out in accordance with details submitted to and approved in writing by the Local Planning Authority and as described on the following drawings:

101 - S2.B - Rev B - 'Foundation GA'
201 - S2.B - Rev B - 'Structural Details'

Reason:

As to construct the foundations in any other manner or to any other design would have the potential to affect groundwater, root protection zones and/or ground gas, the effect of which would be a failure to comply with: the National Planning Policy Framework 2018; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan 2007.

14 COMPLIANCE WITH CONSTRUCTION DETAILS

Unless the prior written consent of the local planning authority has been obtained for any proposed change or variation, the development shall be constructed in accordance with the arrangements and construction details described on the following drawings:

2740-JW-00-ZZ-DR-A-3007 - 'Proposed West Elevation Typical Bay'
2740-JW-00-ZZ-DR-A-3006 - 'Proposed South Elevation Typical Bay'
2740-JW-00-ZZ-DR-A-3005 - 'Proposed North Elevation Typical Bay'
EDC22-DT-201 - Rev C - 'Wall & Gate Details'
2876-SK-141 - Rev P01 - 'Typical Bay Elevation External Materials'
2876-SK-142 - Rev P01 - 'Typical Bay Elevation Pavilion External Materials'

Reason:

To ensure that the new works achieve a suitably high quality of design in accordance with: the National Planning Policy Framework 2018; Strategic Policy 12 (Design and Conservation) of the Core Strategy 2011, and; Saved Policies 3.12 (Quality in Design) and 3.13 (Urban Design) of the Southwark Plan 2007.

15 COMPLIANCE WITH MATERIALS SPECIFICATION AND SAMPLES

Unless the prior written consent of the local planning authority has been obtained for any proposed change or variation, the materials to be used in the implementation of this permission shall not be otherwise than as described and specified in the application and on the drawings hereby approved. The materials, as depicted on 'Photograph of the material samples' [received 13/09/2018], are:

a grey-yellow mottled facing brick
a chocolate brown facing brick with grey fleck
light grey mortar
bronze metallic finish aluminium window frames, gates and louvres
ceramic-backed glass
neutrally-coloured solar-control glass
a dark brown paving brick

Reason:

To ensure that the new works achieve a suitably high quality of design in accordance with: the National Planning Policy Framework 2018; Strategic Policy 12 (Design and Conservation) of the Core Strategy 2011, and; Saved Policies 3.12 (Quality in Design) and 3.13 (Urban Design) of the Southwark Plan 2007.

16 AIR CONDITIONING SPECIFICATION

The air conditioning equipment to be installed shall, unless otherwise approved by the local planning authority, comply with the following specification:

PURY-EP900YSLM-A1 - 'Heat Recovery Outdoor Unit' [Air Conditioning Specification by Mitsubishi Electric]

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with: the National Planning Policy Framework 2018; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan 2007.

17 RESTRICTION ON THE INSTALLATION OF ROOF PLANT AND OTHER ROOF STRUCTURES

No roof plant, equipment or other structures, other than as shown on the plans hereby approved or approved pursuant to a condition of this permission, shall be placed on the roof or be permitted to project above the roofline of the Class D1 building hereby approved as shown on elevational drawings or shall be permitted to extend outside of the roof plant enclosure[s] of said building.

Reason:

In order to ensure that no additional plant is placed on the roof of the building in the interest of the appearance and design of the building and the visual amenity of the area, in accordance with: The National Planning Policy Framework 2018; Strategic Policy 12 (Design and Conservation) of The Core Strategy 2011, and; Saved Policies 3.2 (Protection of Amenity) and 3.13 (Urban Design) of the Southwark Plan 2007.

18 RESTRICTION ON THE INSTATEMENT OF TELECOMMUNICATIONS EQUIPMENT

Notwithstanding the provisions of Parts 24 and 25 The Town & Country Planning [General Permitted Development] Order 1995 [as amended or re-enacted] no external telecommunications equipment or structures shall be placed on the roof or any other part of the Class D1 building hereby permitted.

Reason:

In order to ensure that no telecommunications plant or equipment which might be detrimental to the design and appearance of the building and visual amenity of the area is installed on the roof of the building in accordance with: The National Planning Policy Framework 2018; Strategic Policy 12 (Design and Conservation) of The Core Strategy 2011, and; Saved Policies 3.2 (Protection of Amenity) and 3.13 (Urban Design) of the Southwark Plan 2007.

19 RESTRICTION ON THE INSTALLATION OF APPURTENANCES

No meter boxes, flues, vents or pipes [other than rainwater pipes] or other appurtenances not shown on the approved drawings shall be fixed or installed on the elevations of the Class D1 building within the rear yard.

Reason:

To ensure such works do not detract from the appearance of the building in accordance with: The National Planning Policy Framework 2018; Strategic Policy 12 (Design and Conservation) of The Core Strategy 2011, and; Saved Policies 3.12 (Quality in Design) and 3.13 (Urban Design) of The Southwark Plan 2007.

20 HOURS OF USE OF THE OUTDOOR DINING / 'SPILL OUT' SPACE ASSOCIATED WITH THE ANCILLARY CANTEEN/CAFE

Any tables and chairs placed within any part of the external space shall be brought inside the premises or otherwise made unusable no later than 18:00hrs (6pm) each day, and shall be brought back outside or otherwise made usable no earlier than 08:00hrs (8am) the following day.

Reason:

In order to protect nearby residential occupiers from noise or disturbance from any activities associated with the use or mis-use of this furniture during the late evening and night-time in accordance with: the National Planning Policy Framework 2018; Policy 7.15 (Reducing and Managing Noise, etc) of the London Plan 2016; Strategic Policy 13 (High Environmental Standards) of the Southwark Core Strategy 2011, and; Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan 2007.

21 PLANT NOISE COMPLIANCE

The Rated sound level from any plant, together with any associated ducting shall not exceed the Background sound level (LA90 15min) at the nearest noise sensitive premises. Furthermore, the plant Specific sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific sound levels shall be calculated in full accordance with the methodology of BS4142:2014 .

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with: the National Planning Policy Framework 2018; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan 2007.

22 SERVICING HOURS

Any deliveries, unloading and loading to the Class D1 building within the rear yard shall only take place between 08:00hrs (8am) and 18:00hrs (6pm) Monday to Friday. No deliveries, unloading or loading shall take place on Saturdays, Sundays and Bank Holidays.

Reason:

To ensure that and occupiers of the development and occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance in accordance with: The National Planning Policy Framework 2012; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policy 3.2 (Protection of Amenity) of The Southwark Plan 2007.

23 COMPLIANCE WITH ENERGY STATEMENT

The development hereby permitted shall be carried out in accordance with the 'Energy Statement' [dated May 2018, produced by Delap and Waller], unless otherwise agreed in writing by the Local Planning Authority.

Reason:

To reduce carbon dioxide emissions as required by: the National Planning Policy Framework 2018; Policy 5.15 (Minimising Carbon Dioxide Emissions) of the London Plan 2016; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policy 3.3 (Sustainability and Energy Efficiency) of the Southwark Plan.

24 COMPLIANCE WITH CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN AND CONSTRUCTION TRAFFIC MANAGEMENT PLAN

The implementation of the developments hereby approved shall, unless otherwise approved in writing by the local planning authority, be carried out in strict accordance with the strategies, measures and relevant codes of practice detailed in the following documents:

'Imperial War Museum, Parkside, Construction Traffic Management Plan' [undated, produced by Local Transport Projects]

'Construction and Environmental Management Plan' - Rev D [dated 15/08/2018, produced by REDS10]

Reason:

To ensure that occupiers of neighbouring premises and the wider environment do not suffer a loss of amenity by reason of pollution and nuisance, to ensure minimised impact on the local highway network, and to ensure construction activities have a minimised impact on local air quality, all of which is in accordance with: the National Planning Policy Framework 2018; Policy 7.14 (Improving Air Quality) of the London Plan 2016; Strategic Policies 13 (High Environmental Standards) and 2 (Sustainable Transport) of The Core Strategy 2011, and; Saved Policies 3.2 (Protection of Amenity) and 5.2 (Transport Impacts) of the Southwark Plan 2007.

25 BIRD AND BAT SUPPORT FEATURES

Prior to first occupation of the Class D1 building within the rear yard, a total of no less than three bird boxes, one bird feeder, three bat boxes and one bird bath shall be provided in the the exact location and to the specification and design shown on the following drawings and documents:

EDCC22-GA-100 - Rev M - 'General Arrangement Plan'

EDC22-SP01 - Rev D - 'Outline Landscape Specification' [dated 21/09/2018, produced by Eden Development Consultants Ltd]

The bird and bat support features shall be installed strictly in accordance with these details and shall be maintained as such thereafter.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with: Policies 5.10 (Urban Greening) and 7.19 (Biodiversity and Access to Nature) of the London Plan 2016; Strategic Policy 11 (Open Spaces and Wildlife) of the Core Strategy 2011, and; Saved Policy 3.28 (Biodiversity) of the Southwark Plan 2007.

26 BIODIVERSE ROOF

Prior to first use of the Class D1 building within the rear yard, the biodiverse roof shall be constructed, laid out and

planted/seeded strictly in accordance with the details set out in the following documents:
 EDC22-SP01 - Rev D - 'Outline Landscape Specification' [dated 21/09/2018, produced by Eden Development Consultants Ltd]
 EDC22-GA-205 - Rev A - 'Biodiversity Green Roof Details'
 2740-JW-00-03-DR-A-1003 - 'Proposed Roof Plan'

The biodiverse roof shall be maintained as such thereafter.

The biodiverse roof shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with: Policies 2.18 (Green Infrastructure), 5.3 (Sustainable Design and Construction), 5.10 (Urban Greening), and 5.11 (Green Roofs and Development Site Environs) of the London Plan 2016; Strategic Policy 11 (Open Spaces and Wildlife) of the Core Strategy 2011, and; Saved Policy 3.28 (Biodiversity) of the Southwark Plan 2007.

27 PREVIOUSLY UNIDENTIFIED CONTAMINATION: VERIFICATION OF REMEDIATION

If during each phase of development being brought into use, previously unidentified contamination is encountered, a verification report demonstrating the completion of works dealing with any unexpected contamination and the effectiveness of the remediation of this, shall be submitted to, and approved in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the remediation of unexpected contamination criteria have been met.

Reason:

To ensure that the site does not pose any further risk to human health or the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete, in line with paragraph 109 of the National Planning Policy Framework 2018.

28 PREVIOUSLY UNIDENTIFIED CONTAMINATION: REMEDIATION

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reason:

To ensure that the development does not contribute to, or is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework 2018.

29 COMPLIANCE WITH DRAINAGE STRATEGY

The development hereby approved shall be carried out in accordance with the 'Site Drainage Strategy' [dated May 2018, produced by Design ID].

Reason:

To ensure the development is designed safely in reference to flood risk and sustainable urban drainage in accordance with: The National Planning Policy Framework 2018; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policy 3.9 (Water) of the Southwark Plan 2007.

30 PROVISION OF CYCLE STORAGE FACILITIES

Before the first use of the Class D1 building within the rear yard hereby approved, the cycle storage facilities as shown on drawings

2740-JW-00-ZZ-DR-A-0003 - 'Proposed Site Plan'
 EDC22-DT-202 - Rev B - 'Bin Store & Cycle Store Details'

shall be provided, to the specification and in the locations shown on the drawings. Thereafter, the facilities shall be retained and the space used for no other purpose.

Reason:

To ensure that satisfactory safe and secure bicycle parking is provided and retained for the benefit of the users of the building in order to encourage the use of alternative means of transport and to reduce reliance on the use of the private car, in accordance with: The National Planning Policy Framework 2018; Strategic Policy 2 (Sustainable

Transport) of The Core Strategy, and; Saved Policy 5.3 (Walking and Cycling) of the Southwark Plan 2007.

Other condition(s) - the following condition(s) are to be complied with and discharged in accordance with the individual requirements specified in the condition(s).

31 DETAILS OF EXTERNAL LIGHTING AND SECURITY SURVEILLANCE EQUIPMENT

Details of any external lighting [including design, power and position of luminaries] and security surveillance equipment on/of (whichever the case may be) the Class D1 building and external areas surrounding the building shall be submitted to and approved by the Local Planning Authority in writing before any such lighting or security equipment is installed. The development shall not be carried out otherwise in accordance with any such approval given.

Notwithstanding the indicative details provided within the application documentation, the details to be submitted and approved by the local planning authority shall propose a lighting scheme which provides low-level illumination only (i.e. of the exterior of the Class D1 building at ground floor level and of the external space surrounding the building). None of the proposed fixtures shall, either through their orientation/positioning or level of illuminance, illuminate the first and second floor levels of the exterior of the Class D1 building.

Reason:

In order that the Council may be satisfied as to the details of the development in the interest of the visual amenity of the area, the safety and security of persons using the area and the amenity and privacy of adjoining occupiers in accordance with: the National Planning Policy Framework 2018; Strategic Policy 12 (Design and Conservation) and Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policies 3.2 (Protection of Amenity) and 3.14 (Designing Out Crime) of the Southwark Plan 2007.

32 ARCHAEOLOGY REPORTING SITE WORK

Within six months of the completion of archaeological site works, an assessment report detailing the proposals for post-excavation works, publication of the site and preparation of the archive shall be submitted to and approved in writing by the Local Planning Authority and that the works detailed in this assessment report shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order that the details of the programme of works for the archaeological mitigation works are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site in accordance with: the National Planning Policy Framework 2018; Strategic Policy 12 (Design and Conservation) of the Core Strategy 2011; Saved Policy 3.19 (Archaeology) of the Southwark Plan 2007.

Statement of positive and proactive action in dealing with the application

The Council has published its development plan and core strategy on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

The pre-application service was used for this application and the advice given was followed to a large extent.

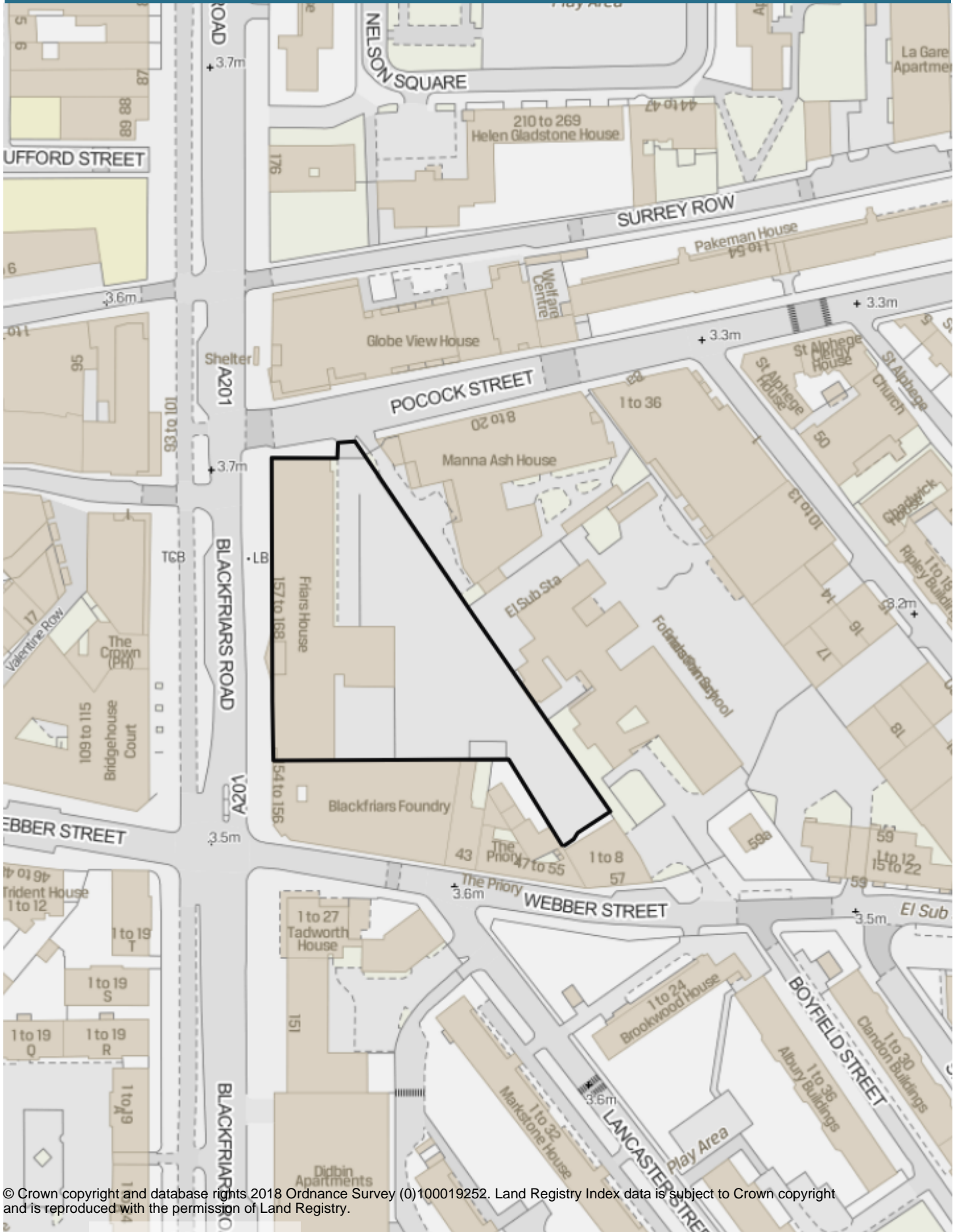
The application was validated promptly.

The application was subject to an Extension of Time to account for the inability to determine it within the statutory 13-week time frame.

Informatives

Prior to works commencing on site (including any demolition) a joint condition survey should be arranged with Southwark Highway Development Team to catalogue condition of streets and drainage gullies. Please contact Hernan Castano, Highway Development Manager on 020 7525 4706 or Hernan.castano@southwark.gov.uk to arrange.

The applicant will be expected to repair any damages to the highway within the vicinity of the development as a result of the construction works.



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50m



Scale = 1250

27-Sep-2018

Item No. 6.2	Classification: Open	Date: 9 October 2018	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 18/AP/1215 for: Full Planning Application Address: 160 BLACKFRIARS ROAD AND LAND TO THE REAR, LONDON SE1 8EZ Proposal: Erection of a 10 storey building (40.23m AOD) with basement, comprising a 220 bedroom hotel with ancillary restaurant (Class C1); flexible office space (Class B1); retail units (Class A1/A3); creation of public space; landscaping and associated works. Works to the existing building at ground and roof levels (including a new rooftop terrace, enclosure and PV panels); elevational alteration; creation of a new entrance and the installation of an architectural feature along the Blackfriars Road elevation.		
Ward(s) or groups affected:	Borough and Bankside		
From:	Director of Planning		
Application Start Date 26/04/2018		Application Expiry Date 26/07/2018	
Earliest Decision Date 06/07/2018		PPA Date 31/01/2019	

RECOMMENDATION

1. a) That planning permission be granted, subject to referral to the Mayor for London, conditions and the applicant entering into a satisfactory legal agreement, and;
 - b) that in the event that the legal agreement is not entered into by 31 January 2019 the Director of Planning be authorised to refuse planning permission if appropriate for the reasons set out in paragraph 116 of this report.

BACKGROUND INFORMATION

Site location and description

2. The application site is the building and service yard located at 160 Blackfriars Road at the junction with Pocock Street. The existing nine storey building is known as Friars House and is occupied by Class A1/A3 uses at ground floor level, including a Sainsburys local store and a Costa coffee, and Class B1 office space on all upper levels. The existing building is broadly 'T' shaped and sits on the Blackfriars Road frontage of the 0.42 hectare triangular plot. There is a large service yard to the rear which is accessed from Pocock Street.
3. Whilst the main site frontage is on Blackfriars Road, the rest of the site is bound by Pocock Street to the north; Manna Ash House (student residence) to the north east; Friars Primary Foundation School to the east; and The Priory and Blackfriars Foundry to the south on Webber Street.
4. The area comprises a mix of building heights and uses as well as a mix of modern and heritage buildings. Globe View House at 10 storeys and Manna Ash House at eight storeys are residential and student housing respectively and are located to the north on Pocock Street. To the east and south on Rushworth Street and Webber Street

buildings are typically more low rise, in the region of three to five storeys in height providing office and residential use. It should be noted that there are consents in place on Rushworth Street for buildings rising six and eight storeys and a consent exists on Webber Street to redevelop the former 'Caretakers House' of Friars Primary School to provide a five storey residential building.

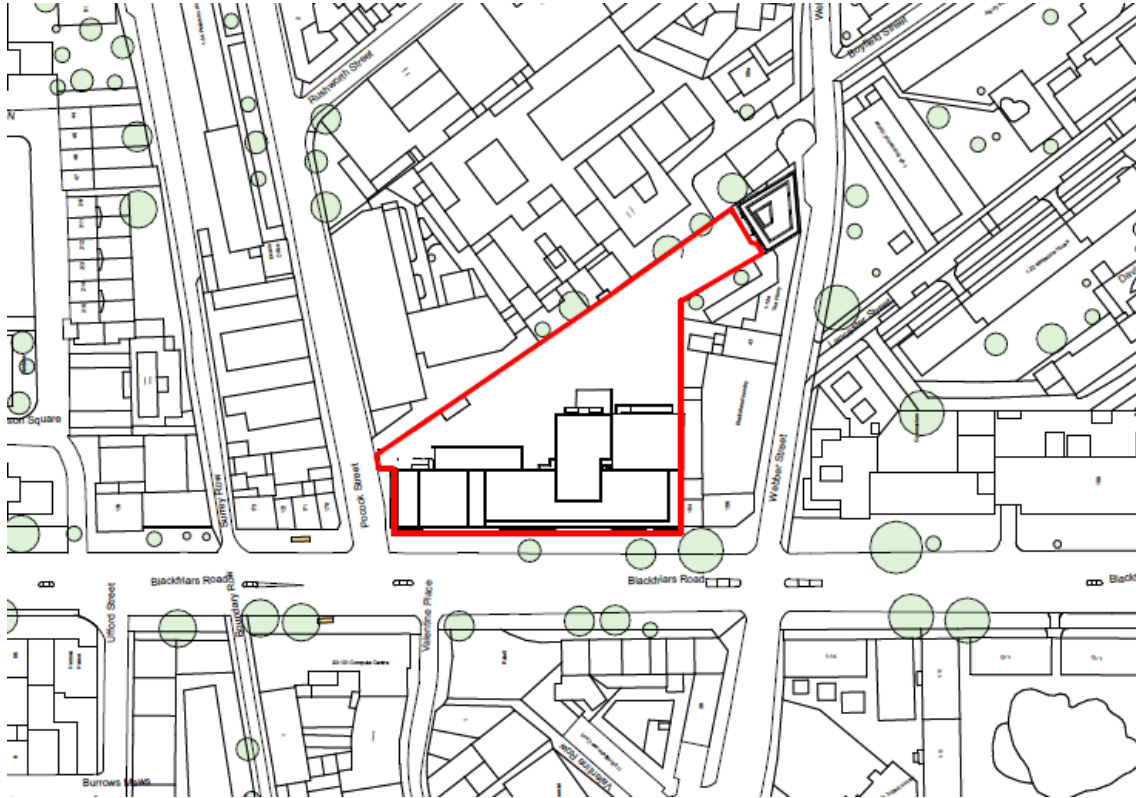


Image - Site plan

5. The site is to the south of, and separate from, the established tall buildings cluster at the northern end of Blackfriars Road.
6. Blackfriars Road is a Classified A road with a Cycle Superhighway and several bus routes which together with the close proximity of both Waterloo East Railway Station and Southwark Underground Station give the site a high PTAL of 6B indicating an excellent level of access to public transport.
7. The site is not located within a conservation area nor are there any listed buildings or structures within the application site. However, the site is flanked by two conservation areas, the Valentine Place conservation area to the west, and the King's Bench conservation area to the east as well as the following listed buildings:
 - the Grade II Listed Albury House and Clandon House to the south on Boyfield Street
 - the Grade II Listed Peabody Buildings on the west side of Blackfriars Road
 - the Grade II Listed Ripley and Merrow House on Rushworth Street and the Drapers Almshouses on Glasshill Street to the west

Details of proposal

8. Planning consent is sought to develop the rear of the site to provide a new 10 storey, 220 bedroom hotel including 24 wheelchair accessible bedrooms. The proposal will incorporate changes to the existing Friars House office building in order to provide a new pedestrian entrance from Blackfriars Road that would lead into a ground floor courtyard flanked by two retail units and an office/co-working space adjacent to the new hotel lobby and restaurant/bar. The proposal would also include a new rooftop

terrace/enclosure over the existing office building and some minor elevational alterations that would serve to emphasise the new "dual" entrance from Blackfriars Road.

9. The development would include a new basement under the proposed hotel that would accommodate staff facilities water tanks and plant rooms. The basement under the existing office building will be amended slightly to remove the access ramp and replace it with a car lift and the five car parking spaces will be reconfigured for accessible use.



Image - Proposed site plan

10. In terms of materials the bottom seven storeys of the hotel would be clad with pre-fabricate modular brick panels. The upper three floors would be clad with ceramic fins. The roof terrace on the existing building would be constructed in pale gold metal louvres and columns, with the first floor louvred canopy being dark grey.



Image - New entrance from Blackfriars Road

Planning History

11. 17/EQ/0104 - Pre-Application Enquiry: Construction of a rear extension to create a C.260 bed hotel.

Summary: Officers expressed significant concerns with the proposed development in terms of land use, height/massing, detailed design, views, access and impact on

Blackfriars Road. From the initial pre-app the scheme was reduced in height from 14 to 12 storeys and some further work was done to improve the entrance to the proposed hotel from Blackfriars Road. Officers advised that 12 storeys was still excessive in height.

12. 13/AP/2123 - Extension to eighth floor to create additional B1 office floorspace of 300sqm GIA (331sqm NIA) and external terrace as well as an air handling unit (AHU). GRANTED 28/10/2013.
13. 12/AP/2284 - Change of use of part of ground floor from office (B1 use) to three units for A1 (retail), A2 (professional services) or A3 (cafe, restaurant) use and retention of an office unit (B1 use) together with associated elevational alterations comprising installation of new shop fronts, access doors and access ramps and installation of cycle stands to the front and external elevational changes and construction of riser ducts to the rear in connection with the refurbishment of the upper floors for continued office use.
GRANTED - 13/09/2012

Planning history of nearby sites

Application reference 09/AP/1749: 46-49 BLACKFRIARS ROAD - GRANTED 09/11/2009

14. Demolition of existing building and erection of a new 14 storey building (maximum 47.93m AOD) incorporating two hotels with a total of 477 bedrooms (Class C1 - total floorspace 16414sqm GIA) each with restaurant (Class A3 - total floorspace 142sqm GIA). This consent has been implemented and the hotels (Ibis and Novotel) are in use.

Application reference 16/AP/1660: FRIARS BRIDGE COURT, 41-45 BLACKFRIARS ROAD, LONDON SE1 8NZ - GRANTED on 11/11/16

15. Demolition of existing office building (Class B1a) and redevelopment to provide a part 13, part 22 storey building plus basement comprising offices (Class B1a) with retail (Classes A1/A3 and A4) together with servicing, car parking and landscaping. This development has not commenced.

Application reference 12/AP/3558: 90-92 BLACKFRIARS ROAD - GRANTED 04/03/2013

16. Demolition of existing buildings and erection of a replacement building of five to eight storeys in height (max height of 27.5m), plus basement, comprising 53 residential units, 633 sqms of retail floorspace (Use Class A1) and 767sqms of office floorspace (Use Class B1), disabled parking spaces and roof top landscaped amenity areas.

Application reference 15/AP/2705: 24-28 RUSHWORTH STREET AND 61 WEBBER STREET - GRANTED 04/08/2016

17. Demolition of the existing building and erection of part six part eight storey (plus basement) mixed use building comprising 40 residential units (15 x 1 bed, 18 x 2 bed & 7 x 3 bed) (use class C3) and 2241 sqm (GIA) flexible commercial space (use class B1) and associated works. This development has not yet commenced.

14-21 RUSHWORTH STREET

18. 15/AP/4000 – Planning permission granted with legal agreement on 31 March 2016 for the erection of a new part five, part six storey building to provide commercial floorspace at lower ground, ground and first floor level (Use Class B1) and 47 residential units (Use Class C3) on first to fifth floor levels, associated disabled car parking, cycle parking and landscaping. This development has not yet commenced.

19. 17/AP/1959 – Planning permission granted with legal agreement on 4 December 2017 for the construction of a new part five, part six storey building to provide commercial floorspace (Use Class B1), associated servicing, cycle parking and landscaping. This development has not yet commenced.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

20. The main issues to be considered in respect of this application are:
- a) principle of the proposed development in terms of land use;
 - b) design issues, including site layout, scale/massing and impact of tall buildings on views;
 - c) the impact on the historic setting of heritage assets;
 - d) impact on the amenities of occupiers of adjoining properties;
 - e) impact of adjoining and nearby uses on occupiers and users of the proposed development;
 - f) flood risk;
 - g) traffic issues, including level of car parking;
 - h) planning obligations;
 - i) sustainable development implications;
 - j) all other relevant material planning considerations.

Planning Policy

21. The statutory development plan for the borough comprises the London Plan 2016, the Southwark Core Strategy 2011, and saved policies of the Southwark Plan (2007).
22. The site is within the Central Activities Zone (CAZ), and Air Quality Management Area (AQMA). The site is within the Bankside, Borough and London Bridge Opportunity Area and the Bankside and Borough District Town Centre. The site is within the area covered by the Blackfriars Road SPD.
23. The planning application should be determined in general accordance with the development plan and National Planning Guidance unless material considerations indicate otherwise; and the following national, regional and local policies and guidance are of particular relevance to this proposal:
24. National Planning Policy Framework (the Framework) 2018

Section 2: Achieving sustainable development

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

25. London Plan July 2016

- Policy 2.5 Sub-regions
- Policy 2.10 Central Activities Zone - strategic priorities
- Policy 2.11 Central Activities Zone - strategic functions
- Policy 2.12 Central Activities Zone - predominantly local activities
- Policy 2.13 Opportunity Areas and Intensification Areas
- Policy 4.1 Developing London's economy
- Policy 4.2 Offices
- Policy 4.3 Mixed use development and offices
- Policy 4.5 London's visitor infrastructure
- Policy 4.7 Retail and town centre development
- Policy 5.1 Climate change mitigation
- Policy 5.2 Minimising carbon dioxide emissions
- Policy 5.3 Sustainable design and construction
- Policy 5.7 Renewable energy
- Policy 5.9 Overheating and cooling
- Policy 5.10 Urban greening
- Policy 5.11 Green roofs and development site environs
- Policy 5.12 Flood risk management
- Policy 5.13 Sustainable drainage
- Policy 5.15 Water use and supplies
- Policy 5.18 Construction, excavation and demolition waste
- Policy 5.21 Contaminated land
- Policy 6.1 Strategic approach
- Policy 6.3 Assessing effects of development on transport capacity
- Policy 6.5 Funding Crossrail and other strategically important transport infrastructure
- Policy 6.9 Cycling
- Policy 6.10 Walking
- Policy 6.11 Smoothing traffic flow and tackling congestion
- Policy 6.12 Road network capacity
- Policy 6.13 Parking
- Policy 7.1 Building London's neighbourhoods and communities
- Policy 7.2 An inclusive environment
- Policy 7.3 Secured by design
- Policy 7.4 Local character
- Policy 7.5 Public realm
- Policy 7.6 Architecture
- Policy 7.7 Location and design of tall and large buildings
- Policy 7.8 Heritage assets and archaeology
- Policy 7.11 London View Management Framework
- Policy 7.14 Improving air quality
- Policy 7.19 Biodiversity and access to nature
- Policy 8.2 Planning obligations
- Policy 8.3 Community infrastructure levy

26. Core Strategy 2011

- Strategic Targets Policy 1 - Achieving growth
- Strategic Targets Policy 2 - Improving places
- Strategic Policy 1 - Sustainable development
- Strategic Policy 2 - Sustainable transport
- Strategic Policy 3 - Shopping, leisure and entertainment
- Strategic Policy 10 - Jobs and businesses
- Strategic Policy 12 - Design and conservation
- Strategic Policy 13 - High environmental standards
- Strategic Policy 14 - Implementation and Delivery

Southwark Plan 2007 (July) - saved policies

27. The Council's cabinet on 19 March 2013, as required by para 215 of the NPPF, considered the issue of compliance of Southwark Planning Policy with the National Planning Policy Framework. All policies and proposals were reviewed and the Council satisfied itself that the policies and proposals in use were in conformity with the NPPF. The resolution was that with the exception of Policy 1.8 (location of retail outside town centres) in the Southwark Plan all Southwark Plan policies are saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their degree of consistency with the NPPF.

Policy 1.1 Access to employment opportunities

Policy 1.4 Employment sites outside the Preferred Office Locations and Preferred Industrial Locations

Policy 1.7 Development within town and local centres

Policy 1.12 Hotels and other visitor accommodation

Policy 2.5 Planning obligations

Policy 3.1 Environmental effects

Policy 3.2 Protection of amenity

Policy 3.3 Sustainability assessment

Policy 3.4 Energy efficiency

Policy 3.6 Air quality

Policy 3.7 Waste reduction

Policy 3.9 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 3.18 Setting of listed buildings, conservation areas and world heritage sites

Policy 3.19 Archaeology

Policy 3:20 Tall buildings

Policy 3.28 Biodiversity

Policy 5.1 Locating developments

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

28. Regional Supplementary Planning Documents (SPDs) and Guidance

Mayor of London: Sustainable Design and Construction (SPG, 2014)

Mayor of London: Energy Strategy (2010)

Mayor of London: Transport Strategy (2010)

Mayor of London: Central Activities Zone (2016)

29. Southwark Supplementary Planning Documents (SPDs)

Sustainability Assessment (2009)

Design and Access Statements (2007)

Section 106 Planning Obligations (2015)

Sustainable Transport (2008)

Sustainable Design and Construction (2009)

Blackfriars Road SPD (2014)

New Southwark Plan

30. Work is under way to prepare a New Southwark Plan (NSP) which will replace the saved policies of the 2007 Southwark Plan and the 2011 Core Strategy. The Council undertook consultation on the submission version of the NSP which concluded in

February 2018. It is anticipated that the plan will be adopted in 2019 following an Examination in Public (EIP). As the NSP is in draft form, it can only be attributed limited weight at present. Within the NSP, the application site is allocated as proposals site NSP15.

Draft London Plan

31. Members should also be aware that the draft New London Plan was published on 30 November 2017 and the consultation period has closed. However, given that the plan still needs to go through Examination in Public and formal adoption, it should be given limited weight at this time.

Principle of development

32. At the heart of the NPPF is the presumption in favour of sustainable development. Amongst the key themes in achieving sustainable development are ensuring the vitality of town centres, promoting sustainable transport, supporting a strong economy, and delivering good design.

Policy context

33. The application site is located within the Central Activities Zone (CAZ), Bankside, Borough and London Bridge Opportunity Area and Borough and Bankside District Town Centre. The site also falls within the area designated in the Blackfriars Road SPD.
34. The London Plan considers Opportunity Areas to be “the capital’s major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other developments linked to existing or potential improvements to public transport.” (Para. 2.58). Within Opportunity Areas, Policy 2.13 seeks to optimise residential and non-residential output and densities, provide social and other infrastructure to sustain growth, and, where appropriate contain a mix of uses. Development proposals should contribute towards meeting (or where appropriate, exceeding) the indicative estimates for employment capacity including supporting wider regeneration (including in particular improvements to environmental quality) and integration of developments to the surrounding area. Policy 4.5 ‘London’s visitor infrastructure’ expects strategically important hotel provision to be located in opportunity areas.
35. Table A1.1 (Annex 1) of the London Plan provides an indicative employment capacity of 25,000 new jobs to be delivered over the plan period (up to 2031) within the Bankside, Borough and London Bridge OA.
36. Southwark’s Core Strategy reinforces the London Plan aspirations for development in the CAZ to support London as a world class city. The CAZ and Opportunity Areas are targeted as growth areas in the borough where development will be prioritised. The council will allow more intense development for a mix of uses in the growth areas and make sure development makes the most of a site’s potential and protects open space (Strategic Policy 1).
37. The adopted Blackfriars Road SPD sets out (Para. 2.2.3) the emerging vision for Blackfriars Road which is:

"Blackfriars Road will be transformed into a vibrant place where people will want to work, live and visit. The historic, wide boulevard will provide a range of different activities, regenerating the area from the river along Blackfriars Road and stimulating change at the Elephant and Castle."
38. The SPD encourages the generation of new jobs and businesses to reinforce the area as a strategic office and employment location. It requires existing business floorspace

to be retained or replaced and encourages a range of other town centre uses which include hotels as defined by the NPPF. SPD2 of the SPD encourages this mixed use nature and states:

"We will encourage the provision of town centre uses to help enhance the commercial attractiveness of Blackfriars Road, supporting proposals for new hotels and other forms of visitor accommodation (Class C1) to ensure there is a good supply of accommodation for visitors and to contribute to a mix of uses and employment opportunities. Proposals should seek to maximise the opportunity to include activity along the lower and street level frontages."

Land use assessment

39. The Blackfriars Road SPD's aspiration for the area is to have a mix of shops, offices and services. It expects opportunities to increase the amount and type of development to be maximised, especially opportunities for flexible innovative business space and town centre uses which include hotels.
40. The proposed development would comprise a hotel with bar and restaurant facilities at ground floor alongside workspace and two separate retail units.

Hotel

41. Saved policy 1.12 of the Southwark Plan states that hotels will be encouraged in areas with high public transport accessibility, but that they will not be permitted where they would result in an over dominance of visitor accommodation in the locality. Strategic Policy 10 - Jobs and businesses of the Core Strategy advises that hotels would be allowed in town centres, strategic cultural areas and places with good accessibility to public transport, providing that there is no harm to local character. In addition, the Borough, Bankside and London Bridge SPD advises that suitable locations for hotels include the northern end of Blackfriars Road.
42. The London Plan (policy 4.5) aims to provide a net increase of 40,000 hotel bedrooms by 2031 and advises boroughs to focus strategically important new visitor provision within opportunity areas and within the Central Activities Zone (CAZ). The application site is located within the CAZ, it has a high public transport accessibility level (which is 6b on scale where 1 represents low accessibility and 6b represents the highest accessibility) and is within walking distance of Southwark, Blackfriars and Waterloo stations. Several bus routes serve Blackfriars Road and Blackfriars Station also provides a direct route to both Gatwick and Luton Airports. The location therefore does meet the requirement for high public transport accessibility.
43. Notwithstanding that a hotel on this site may be appropriately located, the requirement for the proposal to not result in an over dominance of visitor accommodation needs to be considered. There are a number of existing hotels which are located within close proximity to the application site and in the wider Bankside area. An over-concentration of hotels can detract from the vitality of an area, reduce the opportunity for a range of other services to be provided, and can increase the transient population in an area, which does not help towards creating a stable and engaged community as well as potentially being detrimental to the character and functioning of an area.
44. The Bankside area has seen a strong growth in hotels and, whilst this growth helps meet a demand, it is important that this is balanced against the aim of fostering a stable community, and providing space for offices and other important facilities.
45. In the immediate Blackfriars Road area there are a number of existing hotels including the Mad Hatter Hotel on Stamford Street (30 rooms), and the Novotel/Ibis on Blackfriars Road (477 rooms). The 1 Blackfriars development, currently nearing completion, includes a 261 room hotel. In the wider area are the Southwark Rose Hotel (84 rooms) and Novotel London City South (182 rooms) on Southwark Bridge

Road, a Travelodge (202 rooms) on Union Street, the Holiday Inn Express (88 rooms) and the Mercure (144 rooms) on Southwark Street and the recently completed Mondrian hotel in Sea Containers House (358 rooms). A new hotel has recently been consented on the former Lewisham and Southwark College site (LeSoCo) on Ufford Street which would provide 274 hotel rooms, and a 548 bedroom hotel forms part of the recently consented 18 Blackfriars Road development.

46. The GLA's Hotel Demand Study (2006) indicated that approximately 2,500 additional hotel rooms would be needed in the borough over the period 2007 to 2026. Given the number of new hotels built, and those that have consent, it is likely that this target will be reached. A more recent GLA report 'Projections of demand and supply for visitor accommodation in London to 2050' (2017), which provides part of the evidence base to the draft London Plan, sets a higher target of 58,140 net additional rooms across London by 2041. It suggests a target for Southwark of 1,795 net additional rooms in the period 2015 to 2041. It also notes that Southwark currently provides 4% of the total visitor accommodation for London, the 7th highest borough total.
47. The site is considered to be well suited for hotel use given its excellent accessibility to public transport and close proximity to a number of major tourist attractions. The majority of the borough's attractions are located within the Bankside and London Bridge area and as such it is reasonable to expect to see hotel accommodation provided in these areas. The number of hotel developments, both built and in the development pipeline, has increased significantly in the last decade and these are concentrated in the northern part of the borough. However whilst there are a number of hotels in the locality, the surrounding land uses remain very mixed and include offices, residential and retail.
48. Given that the wider area is still very mixed it could not be concluded that there is an over-dominance of hotels in the area which is adversely affecting the character of the area or preventing other uses from functioning successfully. Taking account of the weight of support London Plan Policy 4.5 (London's visitor infrastructure) gives to hotel use in the CAZ and Opportunity Areas, and the importance of tourism to London's economy, the proposed hotel is considered to be an acceptable land use in principle.

Class B1 Office

49. A key objective towards achieving sustainable development is building a strong, competitive economy through securing economic growth. Policies 4.1 and 4.2 of the London Plan promote the contribution made by central London to London's economic success and support developments which meet the needs of the central London office market.
50. At the local level, Strategic Policy 10 of the Core Strategy aims to protect existing business space and support the provision of up to 500,000sqm of additional business floorspace in the Bankside, Borough and London Bridge OA. Saved policy 1.4 of the Southwark Plan requires existing office floorspace to be re provided when sites are redeveloped.
51. The 2014 Blackfriars Road SPD encourages new jobs and businesses along Blackfriars Road area to help consolidate and expand the existing business cluster and reinforce the area as a strategic office and employment location. New business floorspace is encouraged and existing business floorspace is required to be retained or replaced.
52. The existing building on site provides Class B1 office floorspace and this would be fully retained. The construction of the hotel would not undermine the functioning of the office block, whose servicing capacity would be retained. The flexible workspace (Class B1) in the extended ground floor would provide an additional 493sqm of Class B1 floorspace of which 405sqm (GIA) is proposed as an affordable workspace. This

retention and increase of Class B1 office floorspace, including a small affordable workspace, is welcomed as a benefit of the scheme and meets the Core Strategy objective of increasing the number of jobs in Southwark.

Class A1 retail

53. The proposal would also provide some A1 retail floorspace which would be accessed from 'Friars Yard' at ground floor level. The existing building has an established Class A1 use on the ground floor which is accessed from Blackfriars Road. Retail is an appropriate town centre use and the provision of additional retail use at the rear of the site would not only create an additional incentive for the public to use the proposed public space on site but also improve the retail offering for local workers and residents in line with the aspirations of the SPD.

New Southwark Plan

54. The New Southwark Plan is in its draft submission version, awaiting amendments in response to public consultation responses. The examination in public and formal adoption is set to take place in 2019 and as such the policies currently have limited weight. The site is listed as an allocated site under the New Southwark Plan. The site allocation (NSP15) includes a requirement for the re-provision of at least the amount of employment floorspace (B class) currently on the site or to provide at least 50% of the development as employment floorspace, whichever is greater. The policy also requires active frontages with ground floor town centre uses (A1, A2, A3, A4, D1, D2) on Blackfriars Road. Other suitable uses for the site include housing.
55. The site allocation requirements are framed to assume a full redevelopment of the site. Under the current application, the office block is retained in its current form, and the proposed hotel constructed on the open land behind. The proposal would therefore retain the floorspace within the existing office building whilst adding up to 493sqm of additional Class B1 space, thereby meeting the requirements of this emerging designation in that at least the amount of employment floorspace currently on site is retained. The designation does not list hotels as a required or suitable use, and the current proposal does not include housing. Given the weight which could be attached to the emerging NSP, it would not be appropriate to refuse planning permission because an application introduces a land use not listed in the site allocation. Given the weight of support in adopted plans for hotel use, and in the absence of any other material considerations to suggest that a hotel use would not be appropriate here, the failure to fully comply with the emerging NSP site allocation would not be a reason to withhold permission.

Conclusion on Land use

56. The location of the site, within the CAZ, a town centre and an Opportunity Area, and with excellent access to public transport, meets the requirements of regional and local plans for development of hotels. Whilst there are a number of existing and planned hotels in the Bankside and Blackfriars area, they do not over-dominate to the extent that they have harmed the character of the area or its vitality. The function of the retained office block would not be adversely affected, and the additional Class B1 and Class A1 uses are supported within the town centre. The proposed development is therefore supported in land use terms.

Environmental impact assessment

57. The European SEA Directive is transposed into UK law by the Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2017. The Regulations set out the circumstances under which development needs to be underpinned by an Environmental Impact Assessment (EIA). Schedule 1 of the Regulations set out a range of development, predominantly involving industrial operations, for which an EIA is mandatory. Schedule 2 lists a range of development for which an EIA

might be required on the basis that it could give rise to significant environmental impacts. Schedule 3 sets out that the significance of any impact should include consideration of the characteristics of the development, the environmental sensitivity of the location and the nature of the development.

58. The development is not considered to constitute EIA development, based on a review of the scheme against both the EIA Regulations and the European Commission guidance.
59. Consideration however should still be given to the scale, location or nature of development, cumulative impacts and whether these or anything else are likely to give rise to significant environmental impacts. The proposed application is the redevelopment of an existing site for the purposes of a hotel and restaurant with ancillary bar. Its scale is appropriate to its urban setting and it is unlikely to give rise to any significant environmental impacts.

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

60. It is not anticipated that there will be any conflict of use that would have any adverse impact on occupiers of the proposed hotel, retail or office spaces.

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

Overlooking, outlook and privacy

61. The nearest residential properties to the proposed development are located at The Priory (47-55 Webber Street) and The Bell (57 Webber Street). The elevation of the proposed hotel immediately adjacent to The Priory and 57 Webber Street does not contain any windows and as such would not result in any direct overlooking or loss of privacy. Furthermore, the closest point between the hotel and the nearest residential property is 16.3 metres and whilst this is less than the 21 metres set out in the SPD the opposing facades are set at an angle which together with the 16.3 metres separation distance will ensure that there is no detrimental loss of privacy. Acceptable levels of outlook would be retained as the separation distances involved are sufficient to ensure there would be no significant sense of enclosure.
62. The student housing at Manna Ash House would be affected by the proposed development as the southern wing of Manna Ash House would be 8.2 metres and 5.6 metres from the facade of the new hotel at the closest points. The facades of the relevant part of hotel would not be glazed and as such there would be no loss of privacy or overlooking. In terms of outlook, the close proximity of the hotel to Manna Ash House would affect one bedroom and one shared kitchen/dining space on each floor. The bedroom is affected to a lesser degree as views west/north west would be unimpeded. The shared kitchen/dining space does not have the potential for other views however this is a space that is in temporary use throughout the day for meal preparation and food consumption as opposed to a living space that is seen in a cluster flat. On balance, the impact on Manna Ash House is considered acceptable.
63. Friars Primary School will achieve a separation distance of 17.2 metres from the nearest hotel facade and officers are content that this will ensure no significant overlooking or loss of privacy whilst retaining a suitable level of outlook. There would be some overlooking of the playground but this is considered to be a fairly typical urban relationship and would not be harmful.
64. Separation distances between the proposed hotel and the existing office building and the business centre at the Blackfriars Foundry are 10.8 metres and 7.6 metres respectively. However there would be no overlooking as the closest hotel facade would remain unglazed. Additionally the relatively limited depth of the hotel facade at

this point means that the impact on these properties as a result of the proximity of the hotel would be more limited.

Daylight

65. A daylight and sunlight report has been submitted which assesses the scheme based on the Building Research Establishments (BRE) guidelines on daylight and sunlight.
66. The BRE sets out the rationale for testing the daylight impacts of new development through various tests. The first is the Vertical Sky Component test (VSC), which is the most readily adopted. This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. 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 have determined that the daylight can be reduced by about 20% of the original value before the loss is noticeable.
67. The second method that can be used is the No Sky Line (NSL) or Daylight Distribution (DD) method which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of more than 20% in the area of sky visibility, daylight may be affected.
68. The following properties have been assessed as part of the daylight and sunlight assessment:
 - Globe View House (169-173 Blackfriars Road)
 - The Bell (57 Webber Street)
 - The Priory (47-55 Webber Street)
 - Bridgehouse Court (109-115 Blackfriars Road)
 - The Crown (PH)
 - Tadworth House
 - Sharpley Court

Globe View House

69. This is a newly constructed building with residential flats on part of the ground floor and on all upper floors. 110 windows serving 56 rooms have been assessed at this property. 101 of the windows would meet the BRE guidelines (92% compliance). The remaining nine windows have low baseline VSC levels as a result of the deep balconies above these windows with the highest existing VSC level being 5.65%. Due to the existing low baseline level, any reduction in actual VSC will result in a disproportionate percentage reduction. Whilst these windows would see VSC reductions of between 35.56% and 50.77% the actual VSC reductions would be between 0.48 and 2.39. Nine rooms would experience a reduction in daylight distribution (DD) of more than 20% however only five of these rooms would have windows where the VSC is also affected. Given that the VSC reductions are very low in real terms, officers consider the impacts to be acceptable and that the development would not result in a detrimental loss of daylight or skyline at this building sufficient to warrant withholding permission.

The Bell

70. This building sits to the south east of the proposed development and all of the windows that have been assessed for VSC and DD would continue to meet the BRE requirements.

The Priory

71. 26 of the 27 windows assessed at this property for VSC would meet the BRE guidelines and the one window that breaches the guidelines would have a loss of 21.97% which is only 1.97% above the guideline limit and as such is considered to be a marginal loss. All rooms assessed for DD would remain within the BRE guidelines.

Bridgehouse Court

72. 36 windows and 12 rooms have been assessed for VSC and DD respectively. All rooms would continue to have BRE compliant DD. Four windows would have VSC reductions exceeding the BRE guidance however each of these windows serves a room which benefits from other unaffected windows and as such the impacts are considered acceptable.

The Crown

73. All of the windows that have been assessed for VSC and DD would continue to meet the BRE requirements.

Tadworth House

74. 84 windows serving 40 rooms have been assessed at this property which sits to the south of the application site on Webber Street. Whilst all of the rooms would be BRE compliant in terms of DD, six windows would see reductions in VSC beyond the BRE guidelines. All of these windows have very low existing VSC levels and as such the percentage reduction is disproportionate to the real terms loss of VSC. Taken together with the fully compliant DD, the impact of the proposed development on the daylight of this building is considered acceptable.

Sharpley Court

75. The applicant has not had access to the property at Sharpley Court which has commercial use at ground and first floor and residential use on all upper floors. The applicant has therefore tested the 12 windows on the second floor as these will present a worst case scenario. All 12 of the windows assessed will retain VSC levels that are compliant with the BRE with no reductions in VSC in excess of 20%. In terms of DD only two rooms would be affected. One of these rooms would see a DD reduction of 20% which is exactly on the BRE guideline figure of 20% and the other room would see a reduction of 23.3% which is only slightly above the 20% limit. Taken together with the compliant VSC levels, the impact of the development on Sharpley Court is considered to be acceptable.

Sunlight

76. Of all the rooms tested for sunlight, only one would fall slightly below the BRE guidelines on Annual Probable Sunlight Hours and this is a bedroom located within Globe View House. This room falls below the BRE guidelines on winter sunlight only and would retain good levels of summer sunlight. Given that the loss of sunlight is only slightly beyond the BRE guidelines as well as the fact that it is a bedroom which is a less sensitive room in terms of sunlight, the impact is considered acceptable.

Friars Primary School

77. Friars Primary School is not covered by the BRE guidelines (which primarily relate to residential buildings), however the applicant has undertaken a daylight and sunlight assessment to better understand the potential impacts on the school. This has taken the same form as the assessment of the residential properties by considering VSC and DD. 34 windows serving 6 rooms have been assessed and whilst six of these windows would see reductions of more than 20% VSC, in all instances the windows serve rooms that benefit from multiple windows that would continue to receive BRE

compliant VSC levels.

78. The sunlight assessment demonstrates that all rooms will continue to receive BRE compliant sunlight and this is positive. As well as the daylight/sunlight impacts to the building the applicant has assessed the overshadowing to the playground area which is not covered by the canopy, in particular the spaces that are assumed to be used by the nursery.
79. The results demonstrate that the main nursery space that would retain two hours of sunlight on 21st March is likely to be reduced by around 32% as a result of the proposals. However, the area retains 2 hours of sun on ground to around 48.9% which is only very marginally below the BRE criteria. The second space assessed will retain good levels of sunlight above that recommended by the BRE guidelines and the playground as a whole will benefit from sun on ground levels in excess of the recommended 50% on the Spring Equinox. A transient overshadowing study shows that any overshadowing caused by the proposed development will occur in the afternoon after 1pm which will fall outside of the period when this space is most used. Officers consider that the daylight, sunlight and overshadowing impacts to the school are acceptable and would not materially harm the operation of the school or the use and enjoyment of the spaces.

Noise and disturbance

80. The use of the site for an increased quantum of commercial floorspace and in particular for use as a hotel is not anticipated to result in any significant additional disturbance to residents. People arriving to and leaving the hotel would use Blackfriars Road which is a major central London thoroughfare. It is noted that servicing will take place from the rear and that this will be an increase on the current servicing requirements of the site however officers, in consultation with the Councils Transport Team and Environmental Protection Team, are satisfied that this would not lead to additional disturbance and can be adequately controlled by conditions. Conditions will also be imposed on the hours of use for the retail and bar/restaurant functions of the hotel and the new office terrace. The roof terrace will be for the sole use of the existing office building and conditions will ensure that it is not used after 22:00.

Transport issues

81. Saved policy 5.1 of the Southwark Plan seeks to ensure that development is located near transport nodes or, where they are not, it must be demonstrated that sustainable transport options are available to site users and sustainable transport is promoted. In addition, saved policy 5.6 of the Southwark Plan requires development to minimise the number of car parking spaces provided and include justification for the amount of car parking sought taking into account the site Public Transport Accessibility Level (PTAL), the impact on overspill car parking, and the demand for parking within the controlled parking zones.



Image - Proposed ground floor

Public Transport Accessibility

82. The site is located within an area of excellent (6B – high) public transport accessibility with short walking distances to both Southwark Underground and Waterloo Station as well as being situated on Blackfriars Road which is served by many cross London bus routes and a Cycle Superhighway.

Car Parking

83. The development of the existing service yard to the rear will result in the loss of 70 car parking spaces with the five basement car parking spaces being retained. This is a significant reduction in car parking in what is one of the most accessible and sustainable locations within the borough and the reduction in car parking and journeys made by car is fully supported. Borough Controlled Parking Zone provides adequate parking control in this vicinity on weekdays from 08:30 to 18:30. The applicant seeks to retain the five existing car parking spaces in the basement, two of which will be accessible spaces. There is a car club bay near to the site on Pocock Street and loading bays on both sides of this stretch of Blackfriars Road. Whilst no coach parking has been provided there are three existing coach bays on Blackfriars Road and Southwark Street and these coach bays, as well as the loading bays on Blackfriars Road and a large section of the on street parking on Pocock Street were observed vacant during the Transport Officer's site visit between the hours of 14:40 and 16:00 on 12/06/18.
84. Occupiers of the development will be excluded from those eligible for car parking permits under the CPZ operating in this locality and the applicant will be required to provide active electric vehicle charging point for one of the car parking bays. Owing to this site's characteristics the proposed level of car parking is considered acceptable.

Cycle Parking

85. Blackfriars Road is a busy cycling route to and from the City with a fully segregated

Cycle Superhighway and access to cycle hire facilities. The applicant has agreed to make a contribution to cycle hire facilities in the area and these could be used by hotel guests as a sustainable form of transport. The development includes 33 cycle parking spaces with 14 of these being on 7 Sheffield racks on the ground floor for visitors. The type of cycle stand used for the remaining 19 spaces will be secured by condition. This cycle parking level is in line with that stated in the London Plan and is fully supported.

Traffic

86. The applicant's consultants have estimated that the proposed development would generate 16 and 19 two-way vehicle movements in the morning and evening peak hours respectively. The Council's Transport Officer's interrogation of comparable sites' travel surveys within the TRICS travel database suggests that the hotel aspect of this development could generate 22 and 17 two-way vehicle movements in the morning and evening peak hours respectively while its office aspect would create two two-way vehicle movements in the morning or evening peak hours. It is not expected that the retail element would generate any significant vehicle movements given the limited size.
87. As such, under the Council's own assessment, this development would produce 24 and 19 additional two-way vehicle movements in the morning and evening peak hours, respectively. These numbers of net forecasted supplementary vehicular traffic are broadly comparable to those of the applicant's consultants. Transport Officers consider that this development would not have any noticeable adverse impact on the traffic on the adjoining roads. Additionally, it has been demonstrated that the existing public transport infrastructure at this location could accommodate the demand resulting from the development. In addition, the applicant has proposed travel plan initiatives encompassing the provision of public transport information and shower/changing facilities for cyclists and this is fully supported.

Pedestrian movement

88. The footway adjoining this site on Blackfriars Road is wide and connects northerly to the riverside walk along the River Thames and Southwark tube station. In the southbound direction, it joins with the pedestrian routes running through the neighbouring Geraldine Mary Harmsworth Park/Imperial War Museum. This footway also links with the northbound/southbound bus stops immediately north of this site on Blackfriars Road. There are signalized crossings beside this site on the four arms of the adjacent Blackfriars Road/Webber Street junction and traffic calming measures on the segments of Pocock Street and Webber Street next to this site.
89. The applicant has agreed to provide contributions to improvements to the pedestrian route towards the river as well as a contribution towards a new crossing point. This would be secured via the S106 and a S278 agreement. This will provide a sufficient level of amenity to pedestrians and improve the public realm.

Servicing

90. Following construction of the hotel, the remaining section of the existing off-street servicing yard, which is accessed via a gated entrance on Pocock Street, would be used to service the development. Vehicles with a rigid length of up to 8m would be able to access the yard with sufficient turning area to enable them to enter and exit in a forward gear. In addition to this it should be noted that there is also on-street loading facilities on Blackfriars Road, which are located in close proximity to the site.
91. The existing refuse stores serving the other uses and tenants on-site will be retained but relocated to optimise the space available in the service yard.
92. Refuse will be collected from within the servicing yard which has sufficient space to

accommodate a refuse vehicle. Bin storage would be located at the rear of the servicing yard which would prevent the need to transport the bins across the site to the designated collection area. This will allow for refuse contractors to transfer waste quickly and efficiently thereby reducing dwell times.

93. The draft service management plan states that there will be a 'Goods-In Manager' who will coordinate all deliveries and will encourage the use of a booking system. This will ensure that storage and collection of refuse as well as the receipt of deliveries is well managed and efficient. A full service management plan will be secured by condition.

Design issues

94. The NPPF emphasises the importance of good design and states in Paragraph 56 that *"Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making better places for people."*
95. Chapter 7 of the London Plan deals with design related matters. In particular, Policy 7.1 sets out the design principles required for new development and Policy 7.6 requires that architecture should make a positive contribution to the public realm, streetscape and cityscape. Policy 7.8 asserts that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural detail.
96. The relevant Southwark design and conservation policies include Strategic Policy 12 of the Core Strategy and Saved Policies 3.12 'Quality in design', 3.13 'Urban design', 3.16 'Conservation areas', 3.18 'Settings of listed buildings, conservation areas and world heritage sites' and 3.20 'Tall buildings' of the Southwark Plan. These policies require the highest possible standards of design for buildings and public spaces. The principles of good urban design must be taken into account in all developments, including height, scale and massing of buildings, consideration of the local context, including historic environment, its character, and townscape strategic and local views.

Building form and layout

97. The proposal is for a simple 10-storey linear block arranged parallel to the rear of the existing 9-storey T-shaped commercial block. This arrangement results in an H-shaped building of consistent height which has a landscaped courtyard to the south and a consolidated service yard to the north. The application has proposed a new route from Blackfriars Road through the office building which leads to the landscaped south-facing courtyard. At the ground floor, the new route is lined with active uses, a retail unit and a cafe and extends to the rear of the site where visitors will be able to access the hotel reception and dining room.
98. The scheme also includes improvements to the facade of the building fronting Blackfriars Road, including improvements to the existing ramps and shopfronts. These positive changes create a more attractive and engaging street presence, benefitting the pedestrian experience.

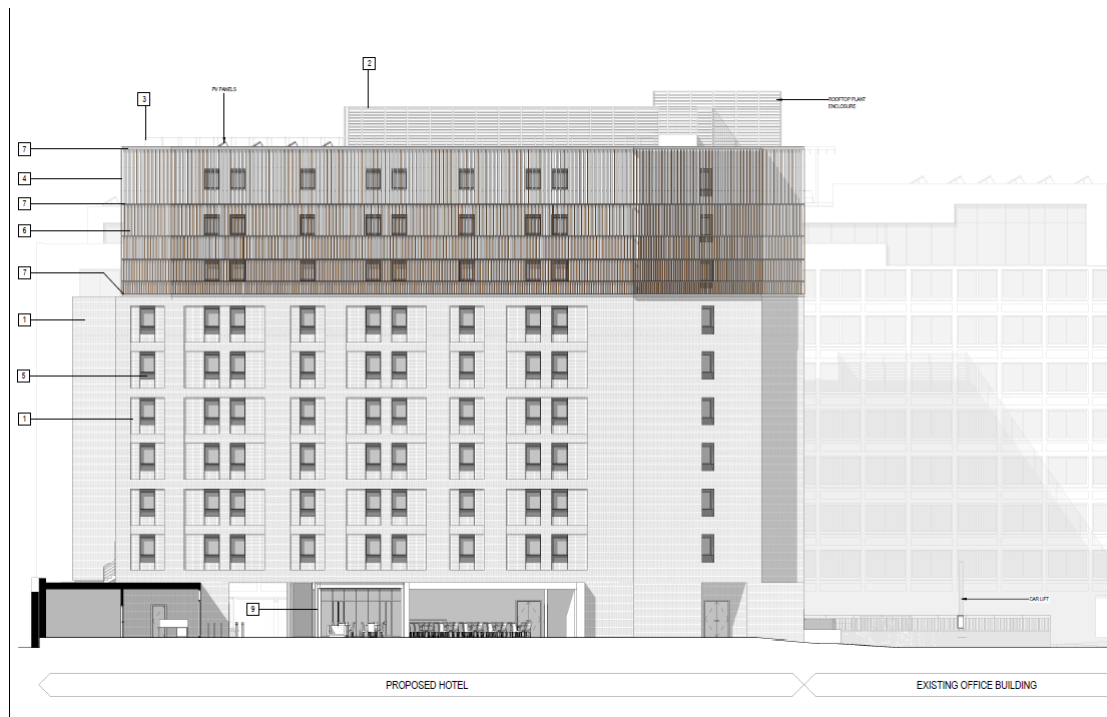


Image - Hotel elevation

99. The hotel would, at over 33 metres to parapet height, be defined as a 'tall building' under saved Southwark Plan policy 3.20. As such, more onerous design requirements in terms of the architectural quality and the contribution to the townscape apply. Whilst the site is outside of the area where very tall buildings would be focused, the Blackfriars Road SPD expects to see buildings up to 30m high along Blackfriars Road between Southwark tube station and St Georges Circus.
100. The hotel building would stand approximately one storey higher than the main frontage of the retained office building and of a similar height to its rear wing. The views submitted with the application demonstrate that the top-most floors are visible from certain angles and this has influenced in the architectural design to break up the mass of the building and give it a subservient appearance where it is viewed in conjunction with the existing office building. The building is angled away from the neighbouring school building and, whilst it may appear close at the northern end, the relationship is not considered overly dominant or harmful to the school. This is because the proposed building is angled away to the south. The ancillary accommodation at the eastern edges of the site, is single-storey in height immediately adjacent to the school, and will not be visible over the high boundary wall. The GLA, in their Stage 1 report, have confirmed that the proposed scale and massing is acceptable in strategic terms.

Architectural design, fabric, function and composition

101. Saved policy 3.12 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.” When we review the quality of a design we consider the appropriateness of the fabric, geometry and function as well as the overall concept for the design relative to the site.
102. In terms of its geometry of the building can be divided into three sections: the access route and landscaping on the ground floor level; the main body of the hotel; and the top three floors.



Image - New courtyard

103. At the ground floor level, a new opening is created to serve the hotel and courtyard, and this would be marked on the Blackfriars Road frontage by a new vertical feature on the façade of the office block. It is designed in such a way that it would draw visitors in from Blackfriars Road, through the existing building and into the courtyard, from which the hotel and retail uses can be accessed. The landscaped route and courtyard references the 'yards' historically associated with Bankside, and is finished in high quality stone with landscaped features.
104. Above the single-storey base the proposed new building is divided into two parts: the main body and the upper three floors. The main body is clad in brick, designed as a simple recessed grid facade, with alternating coupled and single windows. This gives the main body an ordered and well proportioned appearance. The top three floors would be clad in a simple 'veil' of terracotta battens with the windows set behind it. In this way the massing of the three top-most floors is suppressed and lightened especially where it appears in the views over the roof-tops. This would be balanced by the introduction of a new office terrace on the roof of the existing office building. This would be a lightweight structure providing some cover to a new office amenity space which would link to the new elevational treatment on the building facade that highlights the new hotel entrance.



Image - Rear view

105. The overall design would respond well by adding interest and dynamism to the cellular character of the hotel accommodation. The high quality finishes would ensure that the building would have an ordered character and composition that would respond well to the site's established surroundings.

Heritage assets

106. As mentioned in the Site Location and Description section of this report, the nearest heritage assets include the following:
- the Grade II Listed Albury House and Clandon House to the south on Boyfield Street
 - the Grade II Listed Peabody Buildings on the west side of Blackfriars Road
 - the Grade II Listed Ripley and Merrow House on Rushworth Street and the Drapers Almshouses on Glasshill Street to the west
 - the Kings Bench Conservation Area to the east of Rushworth Street and the Valentine Place Conservation Area to the west of the Blackfriars Road.



Image - View from Blackfriars Road

107. Due to the scale of the proposal and its position to the rear of the office block which shields it in views from many approaches, it would not have a harmful impact on the setting of most of these heritage assets. The one location from which the hotel building would be visibly prominent from would be Albury House on Boyfield Street. This listed building is a LCC housing block completed in 1897. Its significance lies in its character as an example of late 19th century social housing and its arts and crafts detailing. From the street, the appearance of this modest 3-storey block is characterised by the horizontal access walkways leading to the housing on every level. Its roof line is articulated by the gabled ends of the block and the gabled centre feature. The listing description highlights the importance of the rear facade - not facing the street - as being the facade that has greater merit. The building is experienced - together with Clandon House - from Boyfield Street as a set piece and together they give the street a strong sense of enclosure.
108. It should be noted that some of the more modern buildings in the area are visible to the north and the south of Boyfield Street, and do not affect the viewers ability to identify and appreciate the listed buildings. Based on the information that has been submitted with this application, it shows that from the southern side of Boyfield Street the proposed development would be visible over the northern gable of Albury House. However, this would only be the top two floors, which is a very small portion when taking into account the overall scale, and in a location where a number of other modern buildings are also visible.
109. When taking into account the small portions of the proposed development that would be visible from Boyfield Street it is considered not to be harmful to the listed building and or its setting. In addition to this, if it were considered that there is harm due to the way the proposal interacts visually with the northern-most gable in this view, that harm is less than substantial and is certainly outweighed by the public benefits of the proposal. Historic England have been consulted on the proposed development and have recommended that a decision is taken in line with local policy and as such have raised no objections to the proposal.

Archaeology

110. The application site does not lie within an Archaeological Priority Zone. However, recent archaeological work to the far side of Blackfriars Road has revealed remains from the prehistoric and Roman periods. However, current industrial standards for London recommend that all major planning applications over 0.5 hectares - whether in an APZ or not - should be considered for archaeological interest.
111. An archaeological Desk Based Assessment (DBA) has been submitted with this application. The assessment shows has stated that if archaeological remains do survive on this site, it is likely that they will survive in localised pockets in the centre. As such, there is sufficient information to establish that the development is not likely to cause such harm that can not be mitigated through the addition of a series of conditions largely focusing on this area of the site.

Planning obligations (S.106 undertaking or agreement)

112. 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.
113. Following the adoption of Southwark's Community Infrastructure Levy (SCIL) on 1 April 2015, much of the historical toolkit obligations such as Education and Strategic Transport have been replaced by SCIL. Only defined site specific mitigation that meets the tests in Regulation 122 can be given weight.
114. After detailed evaluation, the following table sets out the required site specific mitigation and the applicant's position with regard to each point:

Planning Obligation	Mitigation	Applicant Position
Employment during construction	16 sustained jobs for unemployed Southwark residents, 16 short courses and four construction industry apprenticeships or a payment of £77,200.	Agreed
Employment in the development	14 sustained jobs for unemployed Southwark Residents at the end phase, or meet any shortfall through the Employment in the End Use Shortfall Contribution. The maximum Employment in the End Use Shortfall Contribution is £30,200 (based on £4300 per job).	Agreed.
Transport - site specific	£40,000 towards the provision of bus countdown facilities at bus stops on Blackfriars Road.	Agreed with fallback provisions in S106 should the nearby

	£68,720 towards improved pedestrian routes to the riverside and improved coach bays on Southwark Street and Pocock Street/Burrell Street. £20,000 towards an additional pedestrian crossing on Blackfriars Road.	development on Rushworth Street gain consent and be implemented then the contribution for improved pedestrian routes will reduce to £38,720 as the Rushworth Street scheme will be required to contribute £30,000 towards this upgrade.
Cross Rail	£475,560	Agreed
Transport for London	£67,000 towards cycle hire facilities	Agreed.
Public realm	Repave the footway including new kerbing fronting the development on Pocock Street at junction with Blackfriars Road using materials in accordance with Southwark's Streetscape Design Manual. Reconstruct the vehicle crossover on Pocock Street using materials in accordance with Southwark's Streetscape Design Manual	Agreed.
Admin charge (2%)	£15,574	

115. The final CIL and Cross Rail figures will be determined prior to completion of the S106 Agreement based on the detailed CIL liability information that will be submitted. The applicant can offset the Mayoral CIL payment against the Cross Rail contribution. The contributions and in lieu works detailed in the table above will also be secured under the S106 Agreement alongside provisions to secure affordable workspace (at a 30% discount over market rent levels in perpetuity), a Service Management Plan; Environmental Management Plan; Construction Logistics Plan; Hotel Management Plan, Travel Plan; amendments to the Traffic Management Order and the following S.278 Highways work:

- Repave the footway including new kerbing fronting the development on Pocock Street at junction with Blackfriars Road using materials in accordance with Southwark's Streetscape Design Manual.
- Reconstruct the vehicle crossover on Pocock Street using materials in accordance with Southwark's Streetscape Design Manual.

116. In the event that an agreement has not been completed by 31 January 2019, the Committee is asked to authorise the Director of Planning to refuse permission, if appropriate, for the following reason:

"In the absence of a signed Section 106 Agreement, there is no mechanism in place to avoid or mitigate the impact of the proposed development on public realm, transport network or employment and the proposal would therefore be contrary to Saved Policy

2.5 'Planning Obligations' of the Southwark Plan and Policy 14 - 'Implementation and delivery' of the Southwark Core Strategy, the Southwark Supplementary Planning Document 'Section 106 Planning Obligations' 2015, and Policy 8.2 Planning obligations of the London Plan."

Community Infrastructure Levy

117. S143 of the Localism Act 2011 states that any financial sum that an authority has received, will, or could receive in the payment of CIL is a material "local financial consideration" in planning decisions. The requirement for Mayoral and Southwark CIL is a material consideration. However, the weight to be attached to a local finance consideration remains a matter for the decision-maker.
118. Mayoral CIL is to be used for strategic transport improvements in London, primarily Crossrail. The levy is applied to all developments at a rate of £35 (plus indexation) per square metre in Southwark. Southwark CIL in this location has a rate of £272 per square metres for hotels, £125 for retail and £0 for office. SCIL is to be used for infrastructure that supports growth with a Southwark commitment to spend at least 25% locally. The proposed development would generate the following estimated Mayoral and Southwark CIL contributions:
- Mayoral CIL - £495,031.26
Southwark CIL - £998,808.51
119. The final CIL and Cross Rail figures will be determined prior to completion of the S106 Agreement based on the detailed CIL liability information that will be submitted. The applicant can offset the Mayoral CIL payment against the S106 Cross Rail contribution.

Sustainable development implications

120. The submitted Energy Strategy demonstrates how the energy hierarchy has been applied to the proposed development in order to achieve the carbon reduction targets set out in Strategic Policy 13 of the Core Strategy and the London Plan. The Core Strategy and the London Plan also state that there is a presumption that all major development proposals will seek to reduce carbon dioxide emissions by at least 20% through the use of on-site renewable energy generation wherever feasible. In addition, the London Plan expects developments to achieve a reduction in carbon dioxide emissions of 35% over Part L of the 2013 Building Regulations.
121. The proposed development will incorporate a small scale combined heat and power scheme (CHP) for the hotel, air source heat pump technology for the office and retail units, photovoltaic panels for renewable energy and a range of Be Lean, Be Clean, Be Green principles that result in an overall carbon reduction of 36% over Part L of the 2013 Building Regulations which is fully compliant with the London Plan and which is an uplift over the original carbon savings the scheme proposed at 32%.

BREEAM

122. The new building will be required to meet BREEAM 'Excellent' and the Sustainability and Energy Statement submitted with the application indicates that this category is achievable for the proposed new hotel. Attaining BREEAM 'Excellent' for the overall development will be a conditioned requirement of any consent issued.

Other matters

Air quality and noise

123. Retail, office and restaurant/bar use will take place on the ground floor and the end user/operator is not yet defined. Given the proposed range of uses and their potential

for disturbance to adjacent properties, the Council's Environmental Protection Team have recommended a series of conditions aimed at protecting amenity for adjacent occupiers in order to minimise disturbance from noise and odours. The relevant conditions will be imposed on any consent issued and will need to be satisfied prior to any development taking place. This will include operating hours of the retail units, bar/restaurant and office terrace.

Flood risk

124. The site is located in Flood Zone 3 which is defined as having a 'high probability' of river and sea flooding and accordingly the applicant has submitted a Flood Risk Assessment. The Environment Agency were consulted on the application and have not raised any objections subject to an informative regarding an evacuation plan.

Trees

125. There are some large existing trees on Blackfriars Road. The Council's Urban Forester has reviewed the application and does not consider the trees on Blackfriars Road to be a constraint to development or threatened by the development itself. Relevant tree protection measures are to be put in place to protect these trees during construction and appropriate landscaping conditions have been proposed to secure additional landscaping and planting within the courtyard.

Conclusion on planning issues

126. The construction of a hotel would contribute to the supply of visitor accommodation and support the tourist industry which is important to London's economic well-being. The site meets the policy requirements for visitor accommodation, being in the CAZ, an Opportunity Area and a town centre, and has the highest level of accessibility to public transport. The hotel use would not result in an overconcentration of hotels to the exclusion of other land uses and so would not adversely affect the character of the area. The additional retail and workspace units would support the function of the town centre and is a positive aspect of the proposed development. The hotel development would not undermine the operation of the existing office block, which would benefit from the improvements to its facade.
127. 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.

128. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.
129. The Council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights.
130. The Council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.

Consultations

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

Consultation replies

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

Summary of consultation responses

Conservation Area Advisory Group (CAAG)

133. The scheme was presented to CAAG in May 2018 and the panel were satisfied with the proposed height and general arrangement of the building. CAAG felt that the upper (terra cotta) part of the building should be better integrated with the lower (brick clad) part, perhaps by introducing brickwork to the top or alternatively introducing terra cotta to the base. The courtyard design was well received but currently lacks landscape features which would improve the scheme.

Response - Noted and agreed, conditions have been imposed on materials and landscaping which will help to secure a high quality finish to the building and landscaped areas.

Environment Agency

134. No objection subject to an informative regarding an evacuation plan.

Response - Noted and agreed, the relevant informative will be added to any consent issued.

Greater London Authority

135. No objections however the GLA require the applicant to explore the potential for additional measures to deliver further carbon dioxide reductions in accordance with London Plan Policy 5.2 and Policy S12 of the draft London Plan. The applicant is also required to address transport issues with respect to the vehicle and cycle parking quantum, design and management, vehicle pick-up/drop-off, construction and logistics. Transport matters which must be secured by planning condition include: a travel plan, a construction, delivery and servicing plan. The GLA will require the courtyard space to be open on a 24 hour basis.

Response - Noted and agreed, the relevant transport comments will be addressed by condition and S106 obligation. In terms of energy, the applicant has submitted supplementary information to show that the proposed scheme will now result in 36% CO2 saving as opposed to the previously proposed 32% and this is considered to be policy compliant.

Historic England

136. No objection.

Response - Noted.

London Underground

137. No objections.

Response - Noted

Metropolitan Police

138. The hotel and associated uses will help to activate this area. There are several internal design points that should be incorporated to reduce crime and a condition should be imposed that will require the development to attain Secured by Design certification.

Response - Officers agree that a 'Secured by Design' condition should be imposed and this will require the applicant to liaise with the police to incorporate the various design interventions to reduce crime.

Natural England

139. No objections.

Response - Noted.

Thames Water

140. No objections subject to informatives regarding water pressure.

Response - Noted and agreed, the relevant informatives will be added to any consent issued.

Transport for London

141. Transport for London (TfL) have raised no formal objections to the proposed development however they wish to secure the following information and outcomes:

- Step free access to the basement for cyclists;
- 24 hour public access to the new courtyard;
- Alternative uses for the basement car park as and when the current office lease expires;
- Hotel Management Plan to secure details of taxi drop off and collection as well as car parking and lease expiry;
- Policy compliant long and short stay cycle parking;
- Service Management Plan;
- Construction Logistics Plan in compliance with TfL guidance;
- Travel Plan;
- £67,000 towards cycle hire facilities.

Response - The applicant has agreed to the financial contribution for cycle hire facilities and conditions will be imposed to secure details of cycle parking. The Construction Logistics Plan and relevant management plans outlined above will be secured in the S106 Agreement. Conditions will also be imposed to secure step free access to the basement as well as 24 hour access to the public courtyard. Alternative uses of the basement as and when office leases expire is not a planning issue and sits outside the scope of the current application and as such is not supported.

142. Following neighbour consultation, 52 responses have been received of which two support the proposed development and 50 object to the proposal. The main points of objection have been summarised and addressed below.

143. Objection - The proposed development is excessive in scale and inappropriate for this site.

Response - The height of the development would respond well to the original commercial building and in so doing conforms to the principles of the Blackfriars SPD. The views submitted with the application demonstrate that the top-most floors are visible from certain angles and this has influenced the architectural design to break up the mass of the building and give it a less prominent appearance where it is viewed in conjunction with the existing commercial building.

144. Objection - The development will result in increased disturbance for local residents.

Response - The operation of the hotel is not anticipated to result in any undue levels of disturbance or nuisance for local residents particularly as hotel and service management plans would be secured as part of the planning permission. Officers acknowledge that some disturbance during the construction period is an inevitable result of developing land in urban areas. Suitable planning obligations around working hours, construction logistics planning and management of environmental impacts would offer suitable and appropriate mitigation of these issues.

145. Objection - There will be an unacceptable impact on daylight and sunlight to adjacent properties.

Response - As with most developments in Central London, there would be some loss of daylight and sunlight to adjacent residential properties however, the daylight and sunlight assessment submitted by the applicants demonstrates that only a small number of properties are adversely affected and the overall impact is reasonable when existing features of the affected buildings are taken into account. The daylight and sunlight impacts would not justify a refusal of planning permission.

146. Objection - The proposed design is poor quality and the architecture is not in keeping with the area.

Response - The proposed design is a suitable response to the existing office building on Blackfriars Road and the more traditional architecture to the east. Officers consider the design to be high quality and would be enhanced further by the use of high quality materials which would be secured by condition.

147. Objection - The noise, dirt, and vibration caused by construction works will have a significant impact on local residents.

Response - It is accepted that there can be adverse impacts and disturbance to local residents as a result of construction works and to an extent this is unavoidable if land in urban areas is to be developed, however these impacts can be reduced and mitigated by the use of planning obligations around working hours, construction logistics planning and management of environmental impacts would offer suitable and appropriate mitigation of these issues.

148. Objection - The hotel room sizes are too small and some lack natural light.

Response - The proposed hotel rooms come in a range of sizes to offer future customers a choice and are not excessively small with rooms ranging from just over 10 square metres to 16 square metres. It is noted that 20% of the rooms would be internal with no window. There is no set standard or policy for assessing the quality of hotel room accommodation and given that hotel rooms are used on a short term

transient basis, it would not be reasonable to raise this as a significant concern in determining the application.

149. Objection - As well as a loss of daylight, sunlight and open skyline, the proposed development will reduce views across the current open site.

Response - Officers accept that views across this open part of the application site will be lost however there is no entitlement to a view over a third party's land and as such this is not a material consideration.

150. Objection - The proposal for the site is incompatible with the Southwark/Better Bankside plan for the area, which envisages residential usage, or office usage but not mixed usage comprising office usage and hotel accommodation.

Response - The introduction of a hotel would comply with the London Plan, the Core Strategy and the Blackfriars Road SPD. The site allocation on the New Southwark Plan does not envisage hotel use, but this Plan has limited weight at this time, and given the broader support for hotels in other development plan documents it would not be reasonable to refuse permission on the basis of the NSP or any other non-statutory document.

151. Objection - There are insufficient local amenities to service the hotel and the needs of local residents, especially given the rapid pace of development in the local area: restaurant, shopping and leisure provision remains insufficient, and the planning application does not provide sufficient dining opportunities to cater to up to an additional 440 temporary residents per day.

Response - The hotel would have a restaurant/bar and there would be two retail units within the proposed new courtyard. There are also various cafes, restaurants, bars and shops on Blackfriars Road and further north at The Cut which will meet the needs of both hotel guests and local residents.

152. Objection - There are concerns about the impact that the development would have on neighbouring residents as the area is already lacking in community feeling which is adding to the current loneliness epidemic and having another large hotel that encourages short-term visitors is not something this community would benefit from.

Response - The area around Blackfriars Road has traditionally been a mixed use area with commercial properties, offices and homes. Even with the proposed hotel in operation, this area would still be a mixed use area and the introduction of a hotel to the rear of the existing office building is not considered to dilute the character or cohesion of the area.

153. Objection - Many properties would have a significantly reduced view of the sky as a result of the proposed development and the daylight/sunlight assessments that have been submitted as part of the planning application are insufficient as the VSC/NSL/ASPH for Sharpley Court flats have not been reported on.

Response - The applicant has not had access to the property at Sharpley Court which has commercial use at ground and first floor and residential use on all upper floors. The applicant has therefore tested the 12 windows on the second floor as these will present a worst case scenario. All 12 of the windows assessed will retain VSC levels that are compliant with the BRE with no reductions in VSC in excess of 20%. In terms of DD only two rooms would be affected. One of these rooms would see a DD reduction of 20% which is exactly on the BRE guideline figure of 20% and the other room would see a reduction of 23.3% which is only slightly above the 20% limit. Taken together with the compliant VSC levels, the impact of the development on Sharpley Court is considered to be acceptable.

154. Objection - The proposal will result in significant overlooking to adjacent residential

properties and the will impact on amenity due to a loss of privacy.

Response - The nearest residential properties to the proposed development are located at The Priory (47-55 Webber Street) and The Bell (57 Webber Street). The elevation of the proposed hotel immediately adjacent to The Priory and 57 Webber Street does not contain any windows and as such would not result in any direct overlooking or loss of privacy.

155. Objection - The Mayor of London's accessible hotels guide states the typical size of a budget hotel room is 12 - 15 sqm, these rooms fail this definition too. The application states the accessible rooms will be 16.9 sqm, but the Mayors accessible hotels guide states that a basic accessible room should be a minimum size of 20 to 26 sqm. It's unlikely that any disabled users will be able to use these rooms.

Response - The Accessible Hotels Guide (2010) contains minimum room sizes within the appendices however this is a draft document and is not a policy document. The Mayor has not raised the size of the hotel rooms as an issue as part of the Stage I response and as such officers are satisfied that the proposed hotel rooms are acceptable in their form, size and layout. The rooms that have been identified as being accessible rooms demonstrate the required circulation spaces and will be required to meet the current building regulations on disabled access.

156. Objection - Paragraph 2.5 of the Servicing Management Plan estimates 19 to 23 deliveries per day in contrast to the estimate of 25 to 27 in the transport plan. This internal inconsistency is further evidence that the applicant has paid insufficient care and attention to considering the impact of deliveries.

Response - The Councils Transport Team have reviewed the application against comparable sites travel surveys within the TRICS travel database and consider that the development would generate 24 and 19 additional two-way vehicle movements in the morning and evening peak hours, respectively. These numbers of net forecasted supplementary vehicular traffic are comparable to those of the applicants consultants. The Transport Officer has subsequently considered that this proposed development would not have any noticeable adverse impact on the increasing traffic on the adjoining roads.

157. Objection - There is student accommodation directly next to the proposed site, this will cause issues for the students as it will create an environment that will be too noisy for them to study and will impact on their educational experience.

Response - As detailed above, officers consider that the use of planning conditions/obligations regarding servicing, hotel management and hours of operation would be able to appropriately mitigate any potential adverse impacts.

158. Objection - Another aspect to consider is the effect on current occupants of the office building, light will be restricted to the office workers and it could also cause issues with privacy as meeting rooms can be seen from the proposed site.

Response - Two parts of the hotel will directly face the existing office building. The separation distances are 10.8m and 16.7m. The facade of the hotel located 10.8m from the office building will not be glazed and as such will not result in overlooking. The second facade which is 16.7m from the hotel will be glazed but this separation distance is considered acceptable to ensure there would be no overlooking, which is not an amenity concern for an office development. Whilst there would likely be a reduction in daylight, this is not considered to be an amenity concern for an office building and is not covered by the BRE guidance.

159. Objection - There is a primary school on the boundary of the site with a visible playground and this could cause safeguarding issues as unlike a residential address there is no way for the police to keep track of who is staying at the hotel.

Response - The operation of a hotel does not raise any safety concerns. The Metropolitan police were consulted on the proposed development and have not raised any concerns with the hotel being positioned next to a school.

160. Objection - The proposed development does not comply with the NSP15 which requires at least 50% office/employment space.

Response - The policy requires re-provision of office space or at least 50% as office space but this is taken in the context of a full re-development of the site, including redevelopment of the existing office building. The proposed development would retain the existing office building whilst adding up to 493sqm of additional Class B1 space thereby addressing this emerging policy whilst not undermining the functioning of the existing office building.

161. Objection - The existing parking is being reduced for the office tenant and it is not clear on what compensatory measures are being offered.

Response - Compensatory measures are an issue between the landlord and the existing tenant and are not a planning issue. Given the high availability of public transport and the central sustainable location, officers fully support the removal of car parking spaces.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/1390-157 Application file: 18/AP/1215 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 0952 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	Christopher Kirby, Graduate Planning and Terence McLellan, Team Leader	
Version	Final	
Dated	26 September 2018	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINETMEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance & Governance	No	No
Strategic Director, Environment and Social Regeneration	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
Date final report sent to Constitutional Team		27 September 2018

APPENDIX 1**Consultation undertaken****Site notice date:** 03/05/2018**Press notice date:** 03/05/2018**Case officer site visit date:** n/a**Neighbour consultation letters sent:** 04/05/2018**Internal services consulted:**

Ecology Officer
 Economic Development Team
 Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]
 Flood and Drainage Team
 HIGHWAY LICENSING
 Highway Development Management
 Waste Management

Statutory and non-statutory organisations consulted:

Environment Agency
 Greater London Authority
 Historic England
 London Fire & Emergency Planning Authority
 London Underground Limited
 Metropolitan Police Service (Designing out Crime)
 Natural England - London Region & South East Region
 Thames Water - Development Planning
 Transport for London (referable & non-referable app notifications and pre-apps)

Neighbour and local groups consulted:

Flat 27 Stopher House SE1 0SE
 Flat 28 Stopher House SE1 0SE
 Flat 29 Stopher House SE1 0SE
 Flat 26 Stopher House SE1 0SE
 Flat 23 Stopher House SE1 0SE
 Flat 24 Stopher House SE1 0SE
 Flat 25 Stopher House SE1 0SE
 Flat 34 Stopher House SE1 0SE
 Flat 35 Stopher House SE1 0SE
 Flat 36 Stopher House SE1 0SE
 Flat 33 Stopher House SE1 0SE
 Flat 30 Stopher House SE1 0SE
 Flat 31 Stopher House SE1 0SE
 Flat 32 Stopher House SE1 0SE
 Flat 22 Stopher House SE1 0SE
 Flat 11 Stopher House SE1 0RE
 Flat 12 Stopher House SE1 0RE
 Flat 13 Stopher House SE1 0RE
 Flat 10 Stopher House SE1 0RE
 Flat 7 Stopher House SE1 0RE
 Flat 8 Stopher House SE1 0RE
 Flat 9 Stopher House SE1 0RE
 Flat 19 Stopher House SE1 0SE
 Flat 20 Stopher House SE1 0SE
 Flat 21 Stopher House SE1 0SE
 Flat 18 Stopher House SE1 0SE
 Flat 14 Stopher House SE1 0RE
 Flat 15 Stopher House SE1 0RE
 Flat 17 Stopher House SE1 0SE
 Flat 37 Stopher House SE1 0SE

Flat 1 Globe View House SE1 8ER
 Apartment 9 10 Rushworth Street SE1 0RB
 12 Rushworth Street London SE1 0RB
 Apartment 1 10 Rushworth Street SE1 0RB
 Basement And Ground Floors Bell House SE1 0RF
 6 Bell House 57 Webber Street SE1 0RF
 7 Bell House 57 Webber Street SE1 0RF
 8 Bell House 57 Webber Street SE1 0RF
 Apartment 6 10 Rushworth Street SE1 0RB
 Apartment 7 10 Rushworth Street SE1 0RB
 Apartment 8 10 Rushworth Street SE1 0RB
 Apartment 5 10 Rushworth Street SE1 0RB
 Apartment 2 10 Rushworth Street SE1 0RB
 Apartment 3 10 Rushworth Street SE1 0RB
 Apartment 4 10 Rushworth Street SE1 0RB
 Flat 6 Globe View House SE1 8ER
 Flat 26 Globe View House SE1 8ER
 Flat 27 Globe View House SE1 8ER
 Flat 28 Globe View House SE1 8ER
 Flat 25 Globe View House SE1 8ER
 Flat 22 Globe View House SE1 8ER
 Flat 23 Globe View House SE1 8ER
 Flat 24 Globe View House SE1 8ER
 2 Surrey Row London SE1 0FX
 Flat 32 Globe View House SE1 8ER
 Flat 29 Globe View House SE1 8ER
 Flat 30 Globe View House SE1 8ER
 Flat 31 Globe View House SE1 8ER
 Flat 21 Globe View House SE1 8ER
 Flat 11 Globe View House SE1 8ER

Flat 57 Stopher House SE1 0SE
 Flat 58 Stopher House SE1 0SE
 Flat 59 Stopher House SE1 0SE
 Flat 56 Stopher House SE1 0SE
 Flat 53 Stopher House SE1 0SE
 Flat 54 Stopher House SE1 0SE
 Flat 55 Stopher House SE1 0SE
 43 Webber Street London SE1 0RF
 96 Webber Street London SE1 0QN
 21 Rushworth Street London SE1 0RB
 82 Great Suffolk Street London SE1 0BE
 Flat 60 Stopher House SE1 0SE
 15-16 Rushworth Street London SE1 0RB
 49 Surrey Row London SE1 0BY
 Flat 52 Stopher House SE1 0SE
 Flat 42 Stopher House SE1 0SE
 Flat 43 Stopher House SE1 0SE
 Flat 44 Stopher House SE1 0SE
 Flat 41 Stopher House SE1 0SE
 Flat 38 Stopher House SE1 0SE
 Flat 39 Stopher House SE1 0SE
 Flat 40 Stopher House SE1 0SE
 Flat 49 Stopher House SE1 0SE
 Flat 50 Stopher House SE1 0SE
 Flat 51 Stopher House SE1 0SE
 Flat 48 Stopher House SE1 0SE
 Flat 45 Stopher House SE1 0SE
 Flat 46 Stopher House SE1 0SE
 Flat 47 Stopher House SE1 0SE
 Flat 6 Stopher House SE1 0RE
 Flat 29 Bazeley House SE1 0RN
 Flat 30 Bazeley House SE1 0RN
 Flat 31 Bazeley House SE1 0RN
 Flat 28 Bazeley House SE1 0RN
 Flat 25 Bazeley House SE1 0RN
 Flat 26 Bazeley House SE1 0RN
 Flat 27 Bazeley House SE1 0RN
 Unit 11 33 Rushworth Street SE1 0RB
 Unit 7 33 Rushworth Street SE1 0RB
 35-37 Rushworth Street London SE1 0RB
 Unit 17 33 Rushworth Street SE1 0RB
 Flat 32 Bazeley House SE1 0RN
 Milcote House Milcote Street SE1 0RX
 1-3 Kings Bench Street London SE1 0QX
 Flat 24 Bazeley House SE1 0RN
 Flat 14 Bazeley House SE1 0RN
 Flat 15 Bazeley House SE1 0RN
 Flat 16 Bazeley House SE1 0RN
 Flat 13 Bazeley House SE1 0RN

 Flat 10 Bazeley House SE1 0RN
 Flat 11 Bazeley House SE1 0RN
 Flat 12 Bazeley House SE1 0RN
 Flat 21 Bazeley House SE1 0RN
 Flat 22 Bazeley House SE1 0RN
 Flat 23 Bazeley House SE1 0RN
 Flat 20 Bazeley House SE1 0RN
 Flat 17 Bazeley House SE1 0RN
 Flat 18 Bazeley House SE1 0RN
 Flat 19 Bazeley House SE1 0RN
 94 Webber Street London SE1 0QN
 Flat 20 59 Webber Street SE1 0RD
 Flat 21 59 Webber Street SE1 0RD
 Flat 22 59 Webber Street SE1 0RD
 Flat 19 59 Webber Street SE1 0RD
 Flat 16 59 Webber Street SE1 0RD
 Flat 17 59 Webber Street SE1 0RD
 Flat 18 59 Webber Street SE1 0RD
 Flat 3 Stopher House SE1 0RE
 Flat 4 Stopher House SE1 0RE
 Flat 5 Stopher House SE1 0RE
 Flat 2 Stopher House SE1 0RE
 St Alphege Church Kings Bench Street SE1 0QX
 50 Rushworth Street London SE1 0RB
 47 Nelson Square London SE1 0QA
 Flat 15 59 Webber Street SE1 0RD
 Flat 5 59 Webber Street SE1 0RD
 Flat 6 59 Webber Street SE1 0RD
 Flat 7 59 Webber Street SE1 0RD
 Flat 4 59 Webber Street SE1 0RD
 Flat 1 59 Webber Street SE1 0RD
 Flat 2 59 Webber Street SE1 0RD
 Flat 3 59 Webber Street SE1 0RD

 Flat 12 Globe View House SE1 8ER
 Flat 13 Globe View House SE1 8ER
 Flat 10 Globe View House SE1 8ER
 Flat 7 Globe View House SE1 8ER
 Flat 8 Globe View House SE1 8ER
 Flat 9 Globe View House SE1 8ER
 Flat 18 Globe View House SE1 8ER
 Flat 19 Globe View House SE1 8ER
 Flat 20 Globe View House SE1 8ER
 Flat 17 Globe View House SE1 8ER
 Flat 14 Globe View House SE1 8ER
 Flat 15 Globe View House SE1 8ER
 Flat 16 Globe View House SE1 8ER
 5 Bell House 57 Webber Street SE1 0RF
 Flat 18 Sharpley Court SE1 0BJ
 Flat 19 Sharpley Court SE1 0BJ
 Flat 20 Sharpley Court SE1 0BJ
 Flat 17 Sharpley Court SE1 0BJ
 Flat 14 Sharpley Court SE1 0BJ
 Flat 15 Sharpley Court SE1 0BJ
 Flat 16 Sharpley Court SE1 0BJ
 Flat 25 Sharpley Court SE1 0BJ
 Flat 26 Sharpley Court SE1 0BJ
 Flat 27 Sharpley Court SE1 0BJ
 Flat 24 Sharpley Court SE1 0BJ
 Flat 21 Sharpley Court SE1 0BJ
 Flat 22 Sharpley Court SE1 0BJ
 Flat 23 Sharpley Court SE1 0BJ
 Flat 13 Sharpley Court SE1 0BJ
 Flat 3 Sharpley Court SE1 0BJ
 Flat 4 Sharpley Court SE1 0BJ
 Flat 5 Sharpley Court SE1 0BJ
 Flat 2 Sharpley Court SE1 0BJ
 Apartment 9 46 Webber Street SE1 8QW
 Flat 1 Sharpley Court SE1 0BJ
 Flat 10 Sharpley Court SE1 0BJ
 Flat 11 Sharpley Court SE1 0BJ
 Flat 12 Sharpley Court SE1 0BJ
 Flat 9 Sharpley Court SE1 0BJ
 Flat 6 Sharpley Court SE1 0BJ
 Flat 7 Sharpley Court SE1 0BJ
 Flat 8 Sharpley Court SE1 0BJ
 Flat 28 Sharpley Court SE1 0BJ
 Third Floor 88-89 Blackfriars Road SE1 8HA
 Fourth Floor 88-89 Blackfriars Road SE1 8HA
 18-19 Rushworth Street London SE1 0RB
 Second Floor 88-89 Blackfriars Road SE1 8HA
 Church Hall St Alphege Church SE1 0QX
 Excluding Third Floor And Fourth Floor 207 Waterloo Road SE1 8XW
 24 Kings Bench Street London SE1 0QX
 2 Bell House 57 Webber Street SE1 0RF
 3 Bell House 57 Webber Street SE1 0RF
 4 Bell House 57 Webber Street SE1 0RF
 1 Bell House 57 Webber Street SE1 0RF
 Lower Ground Floor Barons Place SE1 8UX
 Ground Floor Flat 86 Blackfriars Road SE1 8HA
 First Floor 88-89 Blackfriars Road SE1 8HA
 Flat 33 Sharpley Court SE1 0BJ
 Flat 34 Sharpley Court SE1 0BJ
 Flat 35 Sharpley Court SE1 0BJ
 Flat 32 Sharpley Court SE1 0BJ
 Flat 29 Sharpley Court SE1 0BJ
 Flat 30 Sharpley Court SE1 0BJ
 Flat 31 Sharpley Court SE1 0BJ
 105 Blackfriars Road London SE1 8HW
 1 Valentine Place London SE1 8QH
 Lower Ground Floor 1-7 Boundary Row SE1 8HP
 Flat 36 Sharpley Court SE1 0BJ
 Ground Floor 1-7 Boundary Row SE1 8HP
 Flat 8 7 Valentine Place SE1 8QH
 Flat 9 7 Valentine Place SE1 8QH
 Flat 7 7 Valentine Place SE1 8QH
 Flat 4 7 Valentine Place SE1 8QH
 Flat 5 7 Valentine Place SE1 8QH
 Flat 6 7 Valentine Place SE1 8QH
 11 Valentine Row London SE1 8BN
 13 Valentine Row London SE1 8BN
 15 Valentine Row London SE1 8BN
 9 Valentine Row London SE1 8BN
 3 Valentine Row London SE1 8BN
 5 Valentine Row London SE1 8BN
 7 Valentine Row London SE1 8BN

Flat 12 59 Webber Street SE1 0RD
 Flat 12a 59 Webber Street SE1 0RD
 Flat 12b 59 Webber Street SE1 0RD
 Flat 11 59 Webber Street SE1 0RD
 Flat 8 59 Webber Street SE1 0RD
 Flat 9 59 Webber Street SE1 0RD
 Flat 10 59 Webber Street SE1 0RD
 64 Webber Row London SE1 8QP
 8 Webber Row London SE1 8QP
 187 Waterloo Road London SE1 8UX
 62 Webber Row London SE1 8QP
 58 Webber Row London SE1 8QP
 6 Webber Row London SE1 8QP
 60 Webber Row London SE1 8QP
 221 Waterloo Road London SE1 8XH
 225 Waterloo Road London SE1 8XH
 227-229 Waterloo Road London SE1 8XH
 219 Waterloo Road London SE1 8XH
 189 Waterloo Road London SE1 8UX
 215 Waterloo Road London SE1 8XH
 217 Waterloo Road London SE1 8XH
 56 Webber Row London SE1 8QP
 38 Webber Row London SE1 8QP
 4 Webber Row London SE1 8QP
 40 Webber Row London SE1 8QP
 36 Webber Row London SE1 8QP
 30 Webber Row London SE1 8QP
 32 Webber Row London SE1 8QP
 34 Webber Row London SE1 8QP
 50 Webber Row London SE1 8QP
 52 Webber Row London SE1 8QP
 54 Webber Row London SE1 8QP
 48 Webber Row London SE1 8QP
 42 Webber Row London SE1 8QP
 44 Webber Row London SE1 8QP
 46 Webber Row London SE1 8QP
 233 Waterloo Road London SE1 8XH
 Flat 9 Dauncy House Webber Row Estate SE1 8QS
 Flat 1 Algar House Webber Row Estate SE1 8QT
 Flat 10 Algar House Webber Row Estate SE1 8QT
 Flat 8 Dauncy House Webber Row Estate SE1 8QS
 Flat 5 Dauncy House Webber Row Estate SE1 8QS
 Flat 6 Dauncy House Webber Row Estate SE1 8QS
 Flat 7 Dauncy House Webber Row Estate SE1 8QS
 Flat 15 Algar House Webber Row Estate SE1 8QT
 Flat 16 Algar House Webber Row Estate SE1 8QT
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 Flat 14 Algar House Webber Row Estate SE1 8QT
 Flat 11 Algar House Webber Row Estate SE1 8QT
 Flat 12 Algar House Webber Row Estate SE1 8QT
 Flat 13 Algar House Webber Row Estate SE1 8QT
 Flat 4 Dauncy House Webber Row Estate SE1 8QS
 Flat 13 Dauncy House Webber Row Estate SE1 8QS
 Flat 14 Dauncy House Webber Row Estate SE1 8QS
 Flat 15 Dauncy House Webber Row Estate SE1 8QS
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 Flat 1 Dauncy House Webber Row Estate SE1 8QS
 Flat 10 Dauncy House Webber Row Estate SE1 8QS
 Flat 11 Dauncy House Webber Row Estate SE1 8QS
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 Flat 19 Dauncy House Webber Row Estate SE1 8QS
 Flat 16 Dauncy House Webber Row Estate SE1 8QS
 Flat 17 Dauncy House Webber Row Estate SE1 8QS
 Flat 18 Dauncy House Webber Row Estate SE1 8QS
 28 Webber Row London SE1 8QP
 9 Lagare Apartments 51 Surrey Row SE1 0BZ
 10 Lagare Apartments 51 Surrey Row SE1 0BZ
 11 Lagare Apartments 51 Surrey Row SE1 0BZ
 8 Lagare Apartments 51 Surrey Row SE1 0BZ
 5 Lagare Apartments 51 Surrey Row SE1 0BZ
 6 Lagare Apartments 51 Surrey Row SE1 0BZ
 7 Lagare Apartments 51 Surrey Row SE1 0BZ
 16 Lagare Apartments 51 Surrey Row SE1 0BZ
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 18 Lagare Apartments 51 Surrey Row SE1 0BZ
 15 Lagare Apartments 51 Surrey Row SE1 0BZ
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 13 Lagare Apartments 51 Surrey Row SE1 0BZ
 14 Lagare Apartments 51 Surrey Row SE1 0BZ
 4 Lagare Apartments 51 Surrey Row SE1 0BZ
 Unit 8 33 Rushworth Street SE1 0RB
 Flat 3 7 Valentine Place SE1 8QH
 Flat 9 5 Valentine Place SE1 8QH
 Flat 10 5 Valentine Place SE1 8QH
 Flat 11 5 Valentine Place SE1 8QH
 Flat 8 5 Valentine Place SE1 8QH
 Flat 5 5 Valentine Place SE1 8QH
 Flat 6 5 Valentine Place SE1 8QH
 Flat 7 5 Valentine Place SE1 8QH
 Flat 16 5 Valentine Place SE1 8QH
 Flat 1 7 Valentine Place SE1 8QH
 Flat 2 7 Valentine Place SE1 8QH
 Flat 15 5 Valentine Place SE1 8QH
 Flat 12 5 Valentine Place SE1 8QH
 Flat 13 5 Valentine Place SE1 8QH
 Flat 14 5 Valentine Place SE1 8QH
 17 Valentine Row London SE1 8BN
 Flat 5 27 Webber Street SE1 8QW
 Flat 6 27 Webber Street SE1 8QW
 Flat 7 27 Webber Street SE1 8QW
 Flat 4 27 Webber Street SE1 8QW
 Flat 1 27 Webber Street SE1 8QW
 Flat 2 27 Webber Street SE1 8QW
 Flat 3 27 Webber Street SE1 8QW
 Flat 12 27 Webber Street SE1 8QW
 Flat 13 27 Webber Street SE1 8QW
 Flat 11 27 Webber Street SE1 8QW
 Flat 8 27 Webber Street SE1 8QW
 Flat 9 27 Webber Street SE1 8QW
 Flat 10 27 Webber Street SE1 8QW
 Flat 4 1 Valentine Row SE1 8BN
 Flat 5 1 Valentine Row SE1 8BN
 Flat 6 1 Valentine Row SE1 8BN
 Flat 3 1 Valentine Row SE1 8BN
 19 Valentine Row London SE1 8BN
 Flat 1 1 Valentine Row SE1 8BN
 Flat 2 1 Valentine Row SE1 8BN
 Flat 11 1 Valentine Row SE1 8BN
 Flat 12 1 Valentine Row SE1 8BN
 Flat 13 1 Valentine Row SE1 8BN
 Flat 10 1 Valentine Row SE1 8BN
 Flat 7 1 Valentine Row SE1 8BN
 Flat 8 1 Valentine Row SE1 8BN
 Flat 9 1 Valentine Row SE1 8BN
 Flat 4 5 Valentine Place SE1 8QH
 Flat 52 Globe View House SE1 0FU
 Flat 53 Globe View House SE1 0FU
 Flat 54 Globe View House SE1 0FU
 Flat 51 Globe View House SE1 0FU
 Flat 48 Globe View House SE1 0FU
 Flat 49 Globe View House SE1 0FU
 Flat 50 Globe View House SE1 0FU
 Flat 59 Globe View House SE1 0FU
 Flat 60 Globe View House SE1 0FU
 Flat 61 Globe View House SE1 0FU
 Flat 58 Globe View House SE1 0FU
 Flat 55 Globe View House SE1 0FU
 Flat 56 Globe View House SE1 0FU
 Flat 57 Globe View House SE1 0FU
 Flat 47 Globe View House SE1 0FU
 Flat 37 Globe View House SE1 0FU
 Flat 38 Globe View House SE1 0FU
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 Flat 41 Globe View House SE1 0FU
 Flat 42 Globe View House SE1 0FU
 Flat 62 Globe View House SE1 0FU
 Flat 82 Globe View House SE1 0FU
 Flat 83 Globe View House SE1 0FU
 Flat 84 Globe View House SE1 0FU
 Flat 81 Globe View House SE1 0FU
 Flat 78 Globe View House SE1 0FU
 Flat 79 Globe View House SE1 0FU
 Flat 80 Globe View House SE1 0FU
 Flat 1 5 Valentine Place SE1 8QH
 Flat 2 5 Valentine Place SE1 8QH

30 Kings Bench Street London SE1 0QX
 Unit 23 33 Rushworth Street SE1 0RB
 17 Rushworth Street London SE1 0RB
 Unit 14 33 Rushworth Street SE1 0RB
 Unit 15 33 Rushworth Street SE1 0RB
 Unit 16 33 Rushworth Street SE1 0RB
 1 Lagare Apartments 51 Surrey Row SE1 0BZ
 2 Lagare Apartments 51 Surrey Row SE1 0BZ
 3 Lagare Apartments 51 Surrey Row SE1 0BZ
 14 Rushworth Street London SE1 0RB
 Unit 21 33 Rushworth Street SE1 0RB
 20 Rushworth Street London SE1 0RB
 1 Lagare Apartments 53 Surrey Row SE1 0DF
 10 Webber Row London SE1 8QP
 12 Webber Row London SE1 8QP
 14 Webber Row London SE1 8QP
 The Crown 108 Blackfriars Road SE1 8HW
 90 Blackfriars Road London SE1 8HW
 22 Webber Row London SE1 8QP
 24 Webber Row London SE1 8QP
 26 Webber Row London SE1 8QP
 20 Webber Row London SE1 8QP
 16 Webber Row London SE1 8QP
 18 Webber Row London SE1 8QP
 2 Webber Row London SE1 8QP
 85 Blackfriars Road London SE1 8HA
 6 Lagare Apartments 53 Surrey Row SE1 0DF
 7 Lagare Apartments 53 Surrey Row SE1 0DF
 8 Lagare Apartments 53 Surrey Row SE1 0DF
 5 Lagare Apartments 53 Surrey Row SE1 0DF
 2 Lagare Apartments 53 Surrey Row SE1 0DF
 3 Lagare Apartments 53 Surrey Row SE1 0DF
 4 Lagare Apartments 53 Surrey Row SE1 0DF
 169 Blackfriars Road London SE1 8ER
 Barons Place 195-203 Waterloo Road SE1 8UX
 Newspaper House 65 Webber Street SE1 0QP
 33 Rushworth Street London SE1 0RB
 176 Blackfriars Road London SE1 8ER
 Flat 3 Tadworth House Lancaster Estate SE1 0RH
 Flat 4 Tadworth House Lancaster Estate SE1 0RH
 Flat 5 Tadworth House Lancaster Estate SE1 0RH
 Flat 27 Tadworth House Lancaster Estate SE1 0RH
 Flat 24 Tadworth House Lancaster Estate SE1 0RH
 Flat 25 Tadworth House Lancaster Estate SE1 0RH
 Flat 26 Tadworth House Lancaster Estate SE1 0RH
 Flat 1 Brookwood House Lancaster Estate SE1 0RJ
 Flat 10 Brookwood House Lancaster Estate SE1 0RJ
 Flat 11 Brookwood House Lancaster Estate SE1 0RJ
 Flat 9 Tadworth House Lancaster Estate SE1 0RH
 Flat 6 Tadworth House Lancaster Estate SE1 0RH
 Flat 7 Tadworth House Lancaster Estate SE1 0RH
 Flat 8 Tadworth House Lancaster Estate SE1 0RH
 Flat 23 Tadworth House Lancaster Estate SE1 0RH
 Flat 14 Tadworth House Lancaster Estate SE1 0RH
 Flat 15 Tadworth House Lancaster Estate SE1 0RH
 Flat 16 Tadworth House Lancaster Estate SE1 0RH
 Flat 13 Tadworth House Lancaster Estate SE1 0RH
 Flat 10 Tadworth House Lancaster Estate SE1 0RH
 Flat 11 Tadworth House Lancaster Estate SE1 0RH
 Flat 12 Tadworth House Lancaster Estate SE1 0RH
 Flat 20 Tadworth House Lancaster Estate SE1 0RH
 Flat 21 Tadworth House Lancaster Estate SE1 0RH
 Flat 22 Tadworth House Lancaster Estate SE1 0RH

 Flat 2 Tadworth House Lancaster Estate SE1 0RH
 Flat 17 Tadworth House Lancaster Estate SE1 0RH
 Flat 18 Tadworth House Lancaster Estate SE1 0RH
 Flat 19 Tadworth House Lancaster Estate SE1 0RH
 Flat 12 Brookwood House Lancaster Estate SE1 0RJ
 Flat 9 Brookwood House Lancaster Estate SE1 0RJ
 Flat 1 Markstone House SE1 0RL
 Flat 10 Markstone House SE1 0RL
 Flat 8 Brookwood House Lancaster Estate SE1 0RJ
 Flat 5 Brookwood House Lancaster Estate SE1 0RJ
 Flat 6 Brookwood House Lancaster Estate SE1 0RJ
 Flat 7 Brookwood House Lancaster Estate SE1 0RJ
 Flat 15 Markstone House SE1 0RL
 Flat 16 Markstone House SE1 0RL
 Flat 17 Markstone House SE1 0RL
 Flat 14 Markstone House SE1 0RL
 Flat 11 Markstone House SE1 0RL
 Flat 12 Markstone House SE1 0RL
 Flat 13 Markstone House SE1 0RL

 Flat 3 5 Valentine Place SE1 8QH
 Flat 85 Globe View House SE1 0FU
 Flat 86 Globe View House SE1 0FU
 Flat 77 Globe View House SE1 0FU
 Flat 67 Globe View House SE1 0FU
 Flat 68 Globe View House SE1 0FU
 Flat 69 Globe View House SE1 0FU
 Flat 66 Globe View House SE1 0FU
 Flat 63 Globe View House SE1 0FU
 Flat 64 Globe View House SE1 0FU
 Flat 65 Globe View House SE1 0FU
 Flat 74 Globe View House SE1 0FU
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 Flat 76 Globe View House SE1 0FU
 Flat 73 Globe View House SE1 0FU
 Flat 70 Globe View House SE1 0FU
 Flat 71 Globe View House SE1 0FU
 Flat 72 Globe View House SE1 0FU
 4 Bench Apartments 22 Kings Bench Street SE1 0QX
 5 Bench Apartments 22 Kings Bench Street SE1 0QX
 6 Bench Apartments 22 Kings Bench Street SE1 0QX
 3 Bench Apartments 22 Kings Bench Street SE1 0QX
 Ro 43 Webber Street SE1 0RF
 1 Bench Apartments 22 Kings Bench Street SE1 0QX
 2 Bench Apartments 22 Kings Bench Street SE1 0QX
 11 Bench Apartments 22 Kings Bench Street SE1 0QX
 12 Bench Apartments 22 Kings Bench Street SE1 0QX
 10 Bench Apartments 22 Kings Bench Street SE1 0QX
 7 Bench Apartments 22 Kings Bench Street SE1 0QX
 8 Bench Apartments 22 Kings Bench Street SE1 0QX
 9 Bench Apartments 22 Kings Bench Street SE1 0QX
 Flat 3a Vaughan House SE1 0PY
 Flat 12 Polychrome Court SE1 8XH
 Flat 7 Polychrome Court SE1 8XH
 Flat 8 Polychrome Court SE1 8XH
 Flat 11 Polychrome Court SE1 8XH
 Flat 5 Polychrome Court SE1 8XH
 Flat 6 Polychrome Court SE1 8XH
 Flat 10 Polychrome Court SE1 8XH
 Flat 2a Vaughan House SE1 0PY
 Flat 3 6 Barons Place SE1 8XB
 Flat 9 Polychrome Court SE1 8XH
 Flat 1 6 Barons Place SE1 8XB
 Flat 2 6 Barons Place SE1 8XB
 Flat 1 86 Blackfriars Road SE1 8HA
 Flat 2 86 Blackfriars Road SE1 8HA
 Flat 3 86 Blackfriars Road SE1 8HA
 Flat 5 6 Burrows Mews SE1 8LD
 Flat 2 6 Burrows Mews SE1 8LD
 Flat 3 6 Burrows Mews SE1 8LD
 Flat 4 6 Burrows Mews SE1 8LD
 13 Bench Apartments 22 Kings Bench Street SE1 0QX
 14 Bench Apartments 22 Kings Bench Street SE1 0QX
 5 Burrows Mews London SE1 8LD
 Flat 4 86 Blackfriars Road SE1 8HA
 Flat 5 86 Blackfriars Road SE1 8HA
 Unit 4 109-115 Blackfriars Road SE1 8HW
 Flat 1 6 Burrows Mews SE1 8LD
 Flat 2 44 Nelson Square SE1 0QA
 Flat 3 44 Nelson Square SE1 0QA
 Flat 1 45 Nelson Square SE1 0QA
 Flat 1 44 Nelson Square SE1 0QA
 Ground Floor First Floor And Second Floor 1-2 Silex Street SE1 0DP
 Tenants Hall Overy House Webber Row Estate SE1 8QX
 Flat 6 45 Nelson Square SE1 0QA
 Flat 5 45 Nelson Square SE1 0QA
 Flat 2 45 Nelson Square SE1 0QA
 Flat 3 45 Nelson Square SE1 0QA
 Flat 4 45 Nelson Square SE1 0QA
 Flat 4 Polychrome Court SE1 8XH
 Unit 3 109-115 Blackfriars Road SE1 8HW
 Flat 4 Garrett House SE1 8LD
 Flat 1 Garrett House SE1 8LD
 Unit 1 And Unit 2 109-115 Blackfriars Road SE1 8HW
 14 The Priory Webber Street SE1 0RQ
 15 The Priory Webber Street SE1 0RQ
 1 Pontypool Place London SE1 8QF
 Flat 2 Garrett House SE1 8LD
 Flat 3 Garrett House SE1 8LD
 1a The Priory Webber Street SE1 0RQ
 7b Kings Bench Street London SE1 0QX
 Middle Floor Flat Alphege House SE1 0BJ

Flat 4 Brookwood House Lancaster Estate SE1 0RJ
 Flat 17 Brookwood House Lancaster Estate SE1 0RJ
 Flat 18 Brookwood House Lancaster Estate SE1 0RJ
 Flat 19 Brookwood House Lancaster Estate SE1 0RJ
 Flat 16 Brookwood House Lancaster Estate SE1 0RJ
 Flat 13 Brookwood House Lancaster Estate SE1 0RJ
 Flat 14 Brookwood House Lancaster Estate SE1 0RJ
 Flat 15 Brookwood House Lancaster Estate SE1 0RJ
 Flat 23 Brookwood House Lancaster Estate SE1 0RJ
 Flat 24 Brookwood House Lancaster Estate SE1 0RJ
 Flat 3 Brookwood House Lancaster Estate SE1 0RJ
 Flat 22 Brookwood House Lancaster Estate SE1 0RJ
 Flat 2 Brookwood House Lancaster Estate SE1 0RJ
 Flat 20 Brookwood House Lancaster Estate SE1 0RJ
 Flat 21 Brookwood House Lancaster Estate SE1 0RJ
 Flat 1 Tadworth House Lancaster Estate SE1 0RH
 Flat 256 Helen Gladstone House SE1 0QB
 Flat 257 Helen Gladstone House SE1 0QB
 Flat 258 Helen Gladstone House SE1 0QB
 Flat 255 Helen Gladstone House SE1 0QB
 Flat 252 Helen Gladstone House SE1 0QB
 Flat 253 Helen Gladstone House SE1 0QB
 Flat 254 Helen Gladstone House SE1 0QB
 Flat 263 Helen Gladstone House SE1 0QB
 Flat 264 Helen Gladstone House SE1 0QB
 Flat 265 Helen Gladstone House SE1 0QB
 Flat 262 Helen Gladstone House SE1 0QB
 Flat 259 Helen Gladstone House SE1 0QB
 Flat 260 Helen Gladstone House SE1 0QB
 Flat 261 Helen Gladstone House SE1 0QB
 Flat 251 Helen Gladstone House SE1 0QB
 Flat 241 Helen Gladstone House SE1 0QB
 Flat 242 Helen Gladstone House SE1 0QB
 Flat 243 Helen Gladstone House SE1 0QB
 Flat 240 Helen Gladstone House SE1 0QB
 Flat 237 Helen Gladstone House SE1 0QB
 Flat 238 Helen Gladstone House SE1 0QB
 Flat 239 Helen Gladstone House SE1 0QB
 Flat 248 Helen Gladstone House SE1 0QB
 Flat 249 Helen Gladstone House SE1 0QB
 Flat 250 Helen Gladstone House SE1 0QB
 Flat 247 Helen Gladstone House SE1 0QB
 Flat 244 Helen Gladstone House SE1 0QB
 Flat 245 Helen Gladstone House SE1 0QB
 Flat 246 Helen Gladstone House SE1 0QB
 Flat 266 Helen Gladstone House SE1 0QB
 Flat 12 Ripley House SE1 0RA
 Flat 2 Ripley House SE1 0RA
 Flat 3 Ripley House SE1 0RA
 Flat 11 Ripley House SE1 0RA
 Flat 9 Merrow House SE1 0QZ
 Flat 1 Ripley House SE1 0RA
 Flat 10 Ripley House SE1 0RA
 Flat 8 Ripley House SE1 0RA
 Flat 9 Ripley House SE1 0RA
 Flat 1 Stopher House SE1 0RE
 Flat 7 Ripley House SE1 0RA
 Flat 4 Ripley House SE1 0RA
 Flat 5 Ripley House SE1 0RA
 Flat 6 Ripley House SE1 0RA
 Flat 8 Merrow House SE1 0QZ
 Flat 1 Merrow House SE1 0QZ
 Flat 10 Merrow House SE1 0QZ
 Flat 11 Merrow House SE1 0QZ
 5 Kings Bench Street London SE1 0QX
 Flat 267 Helen Gladstone House SE1 0QB
 Flat 268 Helen Gladstone House SE1 0QB
 Flat 269 Helen Gladstone House SE1 0QB
 Flat 5 Merrow House SE1 0QZ
 Flat 6 Merrow House SE1 0QZ
 Flat 7 Merrow House SE1 0QZ
 Flat 4 Merrow House SE1 0QZ
 Flat 12 Merrow House SE1 0QZ
 Flat 2 Merrow House SE1 0QZ
 Flat 3 Merrow House SE1 0QZ
 Flat 9 Albury Buildings SE1 0SB
 Flat 1 Clandon Buildings SE1 0SD
 Flat 10 Clandon Buildings SE1 0SD
 Flat 8 Albury Buildings SE1 0SB
 Flat 5 Albury Buildings SE1 0SB
 Flat 6 Albury Buildings SE1 0SB
 Flat 7 Albury Buildings SE1 0SB
 Flat 4 Clandon Buildings SE1 0SD
 2 Pontypool Place London SE1 8QF
 7a Kings Bench Street London SE1 0QX
 Ground Floor 85 Blackfriars Road SE1 8HA
 Second Floor 1-7 Boundary Row SE1 8HP
 Flat 5d Quentin House SE1 8UY
 Unit 22 33 Rushworth Street SE1 0RB
 Unit 24 33 Rushworth Street SE1 0RB
 Flat 14 59 Webber Street SE1 0RD
 Unit 20 33 Rushworth Street SE1 0RB
 Unit 10 33 Rushworth Street SE1 0RB
 Unit 13 33 Rushworth Street SE1 0RB
 Unit 19 33 Rushworth Street SE1 0RB
 Flat 4 94 Webber Street SE1 0QN
 Friars Court Rushworth Street SE1 0RB
 Flat 3 94 Webber Street SE1 0QN
 David Barker House 115a Blackfriars Road SE1 8HW
 Flat 1 94 Webber Street SE1 0QN
 Flat 2 94 Webber Street SE1 0QN
 Flat 1 Polychrome Court SE1 8XH
 Flat 2 Polychrome Court SE1 8XH
 Flat 3 Polychrome Court SE1 8XH
 Flat 4 6 Barons Place SE1 8XB
 Flat 5 6 Barons Place SE1 8XB
 Flat 6 6 Barons Place SE1 8XB
 Flat 70 Patrick Court SE1 0GB
 Flat 71 Patrick Court SE1 0GB
 Flat 72 Patrick Court SE1 0GB
 Flat 69 Patrick Court SE1 0GB
 Flat 66 Patrick Court SE1 0GB
 Flat 67 Patrick Court SE1 0GB
 Flat 68 Patrick Court SE1 0GB
 Flat 6 6 Burrows Mews SE1 8LD
 First Floor 20 Kings Bench Street SE1 0QX
 Ground Floor 20 Kings Bench Street SE1 0QX
 2a Burrows Mews London SE1 8LD
 Flat 73 Patrick Court SE1 0GB
 Flat 74 Patrick Court SE1 0GB
 Flat 75 Patrick Court SE1 0GB
 Flat 65 Patrick Court SE1 0GB
 Flat 55 Patrick Court SE1 0GB
 Flat 56 Patrick Court SE1 0GB
 Flat 57 Patrick Court SE1 0GB
 Flat 54 Patrick Court SE1 0GB
 Flat 51 Patrick Court SE1 0GB
 Flat 52 Patrick Court SE1 0GB
 Flat 53 Patrick Court SE1 0GB
 Flat 62 Patrick Court SE1 0GB
 Flat 63 Patrick Court SE1 0GB
 Flat 64 Patrick Court SE1 0GB
 Flat 61 Patrick Court SE1 0GB
 Flat 58 Patrick Court SE1 0GB
 Flat 59 Patrick Court SE1 0GB
 Flat 60 Patrick Court SE1 0GB
 First Floor 46 Webber Street SE1 8QW
 Second Floor 46 Webber Street SE1 8QW
 Apartment 1 46 Webber Street SE1 8QW
 Ground Floor 46 Webber Street SE1 8QW
 Lower Ground 46 Webber Street SE1 8QW
 Apartment 6 46 Webber Street SE1 8QW
 Apartment 7 46 Webber Street SE1 8QW
 Apartment 8 46 Webber Street SE1 8QW
 Apartment 5 46 Webber Street SE1 8QW
 Apartment 2 46 Webber Street SE1 8QW
 Apartment 3 46 Webber Street SE1 8QW
 Apartment 4 46 Webber Street SE1 8QW
 Ground Floor And First Floor 12-12a Valentine Place SE1 8QH
 Living Accommodation 108 Blackfriars Road SE1 8HW
 Fourth Floor 207 Waterloo Road SE1 8XD
 Third Floor 4 Valentine Place SE1 8QH
 Workshop Stopher House SE1 0RE
 Block S Ground Floor Office Peabody Square SE1 8HU
 159a Applegarth House Nelson Square SE1 0PZ
 Third Floor 207 Waterloo Road SE1 8XD
 92 Blackfriars Road London SE1 8HW
 21 Valentine Place London SE1 8QH
 Flat 50 Patrick Court SE1 0GB
 Flat 10 Patrick Court SE1 0GB
 Flat 11 Patrick Court SE1 0GB
 Flat 12 Patrick Court SE1 0GB
 Flat 9 Patrick Court SE1 0GB
 Flat 6 Patrick Court SE1 0GB
 Flat 7 Patrick Court SE1 0GB
 Flat 8 Patrick Court SE1 0GB

Flat 5 Clandon Buildings SE1 OSD
 Flat 6 Clandon Buildings SE1 OSD
 Flat 3 Clandon Buildings SE1 OSD
 Flat 11 Clandon Buildings SE1 OSD
 Flat 12 Clandon Buildings SE1 OSD
 Flat 2 Clandon Buildings SE1 OSD
 Flat 4 Albury Buildings SE1 OSB
 Flat 17 Albury Buildings SE1 OSB
 Flat 18 Albury Buildings SE1 OSB
 Flat 19 Albury Buildings SE1 OSB
 Flat 16 Albury Buildings SE1 OSB
 Flat 13 Albury Buildings SE1 OSB
 Flat 14 Albury Buildings SE1 OSB
 Flat 15 Albury Buildings SE1 OSB
 Flat 23 Albury Buildings SE1 OSB
 Flat 24 Albury Buildings SE1 OSB
 Flat 3 Albury Buildings SE1 OSB
 Flat 22 Albury Buildings SE1 OSB
 Flat 2 Albury Buildings SE1 OSB
 Flat 20 Albury Buildings SE1 OSB
 Flat 21 Albury Buildings SE1 OSB
 Flat 7 Clandon Buildings SE1 OSD
 Flat 1a Pakeman House SE1 OBH
 Flat 1 Bazeley House SE1 ORN
 Flat 2 Bazeley House SE1 ORN
 Unit 12 33 Rushworth Street SE1 ORB
 8 The Priory Webber Street SE1 ORQ
 9 The Priory Webber Street SE1 ORQ
 Unit 9 33 Rushworth Street SE1 ORB
 Flat 7 Bazeley House SE1 ORN
 Flat 8 Bazeley House SE1 ORN
 Flat 9 Bazeley House SE1 ORN
 Flat 6 Bazeley House SE1 ORN
 Flat 3 Bazeley House SE1 ORN
 Flat 4 Bazeley House SE1 ORN
 Flat 5 Bazeley House SE1 ORN
 7 The Priory Webber Street SE1 ORQ
 1 The Priory Webber Street SE1 ORQ
 10 The Priory Webber Street SE1 ORQ
 11 The Priory Webber Street SE1 ORQ
 Friars Primary School Webber Street SE1 ORF
 Flat 8 Clandon Buildings SE1 OSD
 Flat 9 Clandon Buildings SE1 OSD
 Flat 16 Stopher House SE1 OSE
 4 The Priory Webber Street SE1 ORQ
 5 The Priory Webber Street SE1 ORQ
 6 The Priory Webber Street SE1 ORQ
 3 The Priory Webber Street SE1 ORQ
 12 The Priory Webber Street SE1 ORQ
 13 The Priory Webber Street SE1 ORQ
 2 The Priory Webber Street SE1 ORQ
 Flat 12 Albury Buildings SE1 OSB
 Flat 6 Markstone House SE1 ORL
 Flat 7 Markstone House SE1 ORL
 Flat 8 Markstone House SE1 ORL
 Flat 5 Markstone House SE1 ORL
 Flat 31 Markstone House SE1 ORL
 Flat 32 Markstone House SE1 ORL
 Flat 4 Markstone House SE1 ORL
 Flat 12 Lingfield House Lancaster Estate SE1 ORW
 Flat 13 Lingfield House Lancaster Estate SE1 ORW
 Flat 14 Lingfield House Lancaster Estate SE1 ORW
 Flat 11 Lingfield House Lancaster Estate SE1 ORW
 Flat 9 Markstone House SE1 ORL
 Flat 1 Lingfield House Lancaster Estate SE1 ORW
 Flat 10 Lingfield House Lancaster Estate SE1 ORW
 Flat 30 Markstone House SE1 ORL
 Flat 21 Markstone House SE1 ORL
 Flat 22 Markstone House SE1 ORL
 Flat 23 Markstone House SE1 ORL
 Flat 20 Markstone House SE1 ORL
 Flat 18 Markstone House SE1 ORL
 Flat 19 Markstone House SE1 ORL
 Flat 2 Markstone House SE1 ORL
 Flat 28 Markstone House SE1 ORL
 Flat 29 Markstone House SE1 ORL
 Flat 3 Markstone House SE1 ORL
 Flat 27 Markstone House SE1 ORL
 Flat 24 Markstone House SE1 ORL
 Flat 25 Markstone House SE1 ORL
 Flat 26 Markstone House SE1 ORL
 Flat 15 Lingfield House Lancaster Estate SE1 ORW
 Flat 33 Lingfield House Lancaster Estate SE1 ORW
 Flat 17 Patrick Court SE1 OGB
 Flat 18 Patrick Court SE1 OGB
 Flat 19 Patrick Court SE1 OGB
 Flat 16 Patrick Court SE1 OGB
 Flat 13 Patrick Court SE1 OGB
 Flat 14 Patrick Court SE1 OGB
 Flat 15 Patrick Court SE1 OGB
 Flat 5 Patrick Court SE1 OGB
 Second Floor 82-83 Blackfriars Road SE1 8HA
 Third Floor 82-83 Blackfriars Road SE1 8HA
 First Floor Front 82-83 Blackfriars Road SE1 8HA
 First Floor Rear 82-83 Blackfriars Road SE1 8HA
 15 Bench Apartments 22 Kings Bench Street SE1 0QX
 16 Bench Apartments 22 Kings Bench Street SE1 0QX
 Fourth Floor 82-83 Blackfriars Road SE1 8HA
 Flat 2 Patrick Court SE1 OGB
 Flat 3 Patrick Court SE1 OGB
 Flat 4 Patrick Court SE1 OGB
 Flat 1 Patrick Court SE1 OGB
 Ground Floor 82-83 Blackfriars Road SE1 8HA
 30 Rushworth Street London SE1 ORB
 Flat 20 Patrick Court SE1 OGB
 Flat 40 Patrick Court SE1 OGB
 Flat 41 Patrick Court SE1 OGB
 Flat 42 Patrick Court SE1 OGB
 Flat 39 Patrick Court SE1 OGB
 Flat 36 Patrick Court SE1 OGB
 Flat 37 Patrick Court SE1 OGB
 Flat 38 Patrick Court SE1 OGB
 Flat 47 Patrick Court SE1 OGB
 Flat 48 Patrick Court SE1 OGB
 Flat 49 Patrick Court SE1 OGB
 Flat 46 Patrick Court SE1 OGB
 Flat 43 Patrick Court SE1 OGB
 Flat 44 Patrick Court SE1 OGB
 Flat 45 Patrick Court SE1 OGB
 Flat 35 Patrick Court SE1 OGB
 Flat 25 Patrick Court SE1 OGB
 Flat 26 Patrick Court SE1 OGB
 Flat 27 Patrick Court SE1 OGB
 Flat 24 Patrick Court SE1 OGB
 Flat 21 Patrick Court SE1 OGB
 Flat 22 Patrick Court SE1 OGB
 Flat 23 Patrick Court SE1 OGB
 Flat 32 Patrick Court SE1 OGB
 Flat 33 Patrick Court SE1 OGB
 Flat 34 Patrick Court SE1 OGB
 Flat 31 Patrick Court SE1 OGB
 Flat 28 Patrick Court SE1 OGB
 Flat 29 Patrick Court SE1 OGB
 Flat 30 Patrick Court SE1 OGB
 Flat 32 Pakeman House SE1 OBH
 Flat 33 Pakeman House SE1 OBH
 Flat 34 Pakeman House SE1 OBH
 Flat 31 Pakeman House SE1 OBH
 Flat 29 Pakeman House SE1 OBH
 Flat 3 Pakeman House SE1 OBH
 Flat 30 Pakeman House SE1 OBH
 Flat 39 Pakeman House SE1 OBH
 Flat 4 Pakeman House SE1 OBH
 Flat 40 Pakeman House SE1 OBH
 Flat 38 Pakeman House SE1 OBH
 Flat 35 Pakeman House SE1 OBH
 Flat 36 Pakeman House SE1 OBH
 Flat 37 Pakeman House SE1 OBH
 Flat 28 Pakeman House SE1 OBH
 Flat 19 Pakeman House SE1 OBH
 Flat 2 Pakeman House SE1 OBH
 Flat 20 Pakeman House SE1 OBH
 Flat 18 Pakeman House SE1 OBH
 Flat 15 Pakeman House SE1 OBH
 Flat 16 Pakeman House SE1 OBH
 Flat 17 Pakeman House SE1 OBH
 Flat 25 Pakeman House SE1 OBH
 Flat 26 Pakeman House SE1 OBH
 Flat 27 Pakeman House SE1 OBH
 Flat 24 Pakeman House SE1 OBH
 Flat 21 Pakeman House SE1 OBH
 Flat 22 Pakeman House SE1 OBH
 Flat 23 Pakeman House SE1 OBH
 Flat 41 Pakeman House SE1 OBH
 Flat 10 Vaughan House SE1 OPY
 Flat 11 Vaughan House SE1 OPY

Flat 4 Lingfield House Lancaster Estate SE1 0RW
 Flat 5 Lingfield House Lancaster Estate SE1 0RW
 Flat 32 Lingfield House Lancaster Estate SE1 0RW
 Flat 3 Lingfield House Lancaster Estate SE1 0RW
 Flat 30 Lingfield House Lancaster Estate SE1 0RW
 Flat 31 Lingfield House Lancaster Estate SE1 0RW
 Flat 1 Albury Buildings SE1 0SB
 Flat 10 Albury Buildings SE1 0SB
 Flat 11 Albury Buildings SE1 0SB
 Flat 9 Lingfield House Lancaster Estate SE1 0RW
 Flat 6 Lingfield House Lancaster Estate SE1 0RW
 Flat 7 Lingfield House Lancaster Estate SE1 0RW
 Flat 8 Lingfield House Lancaster Estate SE1 0RW
 Flat 29 Lingfield House Lancaster Estate SE1 0RW
 Flat 2 Lingfield House Lancaster Estate SE1 0RW
 Flat 20 Lingfield House Lancaster Estate SE1 0RW
 Flat 21 Lingfield House Lancaster Estate SE1 0RW
 Flat 19 Lingfield House Lancaster Estate SE1 0RW
 Flat 16 Lingfield House Lancaster Estate SE1 0RW
 Flat 17 Lingfield House Lancaster Estate SE1 0RW
 Flat 18 Lingfield House Lancaster Estate SE1 0RW
 Flat 26 Lingfield House Lancaster Estate SE1 0RW
 Flat 27 Lingfield House Lancaster Estate SE1 0RW
 Flat 28 Lingfield House Lancaster Estate SE1 0RW
 Flat 25 Lingfield House Lancaster Estate SE1 0RW
 Flat 22 Lingfield House Lancaster Estate SE1 0RW
 Flat 23 Lingfield House Lancaster Estate SE1 0RW
 Flat 24 Lingfield House Lancaster Estate SE1 0RW
 21 Webber Street London SE1 8QW
 231 Waterloo Road London SE1 8XH
 Suite 213 154-156 Blackfriars Road SE1 8EN
 Suite 301 154-156 Blackfriars Road SE1 8EN
 Block D Estate Office Peabody Square SE1 8HZ
 Suite 306 154-156 Blackfriars Road SE1 8EN
 2-6 Boundary Row London SE1 8HP
 Suite G02 154-156 Blackfriars Road SE1 8EN
 Suite 109 154-156 Blackfriars Road SE1 8EN
 Suite 107 154-156 Blackfriars Road SE1 8EN
 Suite 201 154-156 Blackfriars Road SE1 8EN
 Suite 309 154-156 Blackfriars Road SE1 8EN
 Suite 210 154-156 Blackfriars Road SE1 8EN
 Suite 303 To 307 154-156 Blackfriars Road SE1 8EN
 223 Waterloo Road London SE1 8XH
 207 Waterloo Road London SE1 8XD
 Suite 311 154-156 Blackfriars Road SE1 8EN
 Suite 110 154-156 Blackfriars Road SE1 8EN
 87 Blackfriars Road London SE1 8HA
 2 Burrows Mews London SE1 8LD
 Suite 111 154-156 Blackfriars Road SE1 8EN
 Suite G06 154-156 Blackfriars Road SE1 8EN
 Suite 209 154-156 Blackfriars Road SE1 8EN
 109 Blackfriars Road London SE1 8HW
 191 Waterloo Road London SE1 8UX
 Suite 304 154-156 Blackfriars Road SE1 8EN
 Suite 106 154-156 Blackfriars Road SE1 8EN
 Suite 203 And 204 154-156 Blackfriars Road SE1 8EN
 Suite 308 154-156 Blackfriars Road SE1 8EN
 Suite 112 To 133 154-156 Blackfriars Road SE1 8EN
 First Floor 1-7 Boundary Row SE1 8HP
 Suite 113 154-156 Blackfriars Road SE1 8EN
 Suite 212 154-156 Blackfriars Road SE1 8EN
 Suite 305 154-156 Blackfriars Road SE1 8EN
 First Floor Flat 81 Blackfriars Road SE1 8HA
 Flat 1 84 Blackfriars Road SE1 8HA
 Flat 2 84 Blackfriars Road SE1 8HA
 Manna House 8-20 Pocock Street SE1 0BW
 59a Webber Street London SE1 0RF
 St Alphege Clergy House Pocock Street SE1 0BJ
 The Convent 48 Rushworth Street SE1 0RB
 Suite 200a 154-156 Blackfriars Road SE1 8EN
 Suite G07 154-156 Blackfriars Road SE1 8EN
 Health Centre 151-153 Blackfriars Road SE1 8EL
 Suite 206 154-156 Blackfriars Road SE1 8EN
 Suite 105 154-156 Blackfriars Road SE1 8EN
 Suite 104 154-156 Blackfriars Road SE1 8EN
 Suite 208 154-156 Blackfriars Road SE1 8EN
 Suite 101 154-156 Blackfriars Road SE1 8EN
 19 Valentine Place London SE1 8QH
 Suite 108 154-156 Blackfriars Road SE1 8EN
 Suite G03 And G04 154-156 Blackfriars Road SE1 8EN
 Suite 200b 154-156 Blackfriars Road SE1 8EN
 Block R Flat 7 Peabody Square SE1 8JF
 Block R Flat 8 Peabody Square SE1 8JF
 Flat 12 Vaughan House SE1 0PY
 Flat 1 Vaughan House SE1 0PY
 Flat 7 Pakeman House SE1 0BH
 Flat 8 Pakeman House SE1 0BH
 Flat 9 Pakeman House SE1 0BH
 Flat 17 Vaughan House SE1 0PY
 Flat 18 Vaughan House SE1 0PY
 Flat 19 Vaughan House SE1 0PY
 Flat 16 Vaughan House SE1 0PY
 Flat 13 Vaughan House SE1 0PY
 Flat 14 Vaughan House SE1 0PY
 Flat 15 Vaughan House SE1 0PY
 Flat 6 Pakeman House SE1 0BH
 Flat 46 Pakeman House SE1 0BH
 Flat 47 Pakeman House SE1 0BH
 Flat 48 Pakeman House SE1 0BH
 Flat 45 Pakeman House SE1 0BH
 Flat 42 Pakeman House SE1 0BH
 Flat 43 Pakeman House SE1 0BH
 Flat 44 Pakeman House SE1 0BH
 Flat 52 Pakeman House SE1 0BH
 Flat 53 Pakeman House SE1 0BH
 Flat 54 Pakeman House SE1 0BH
 Flat 51 Pakeman House SE1 0BH
 Flat 49 Pakeman House SE1 0BH
 Flat 5 Pakeman House SE1 0BH
 Flat 50 Pakeman House SE1 0BH
 Flat 14 Pakeman House SE1 0BH
 30 Dibdin Apartments 149 Blackfriars Road LONDON
 31 Dibdin Apartments 149 Blackfriars Road LONDON
 32 Dibdin Apartments 149 Blackfriars Road LONDON
 29 Dibdin Apartments 149 Blackfriars Road LONDON
 26 Dibdin Apartments 149 Blackfriars Road LONDON
 27 Dibdin Apartments 149 Blackfriars Road LONDON
 28 Dibdin Apartments 149 Blackfriars Road LONDON
 37 Dibdin Apartments 149 Blackfriars Road LONDON
 38 Dibdin Apartments 149 Blackfriars Road LONDON
 39 Dibdin Apartments 149 Blackfriars Road LONDON
 36 Dibdin Apartments 149 Blackfriars Road LONDON
 33 Dibdin Apartments 149 Blackfriars Road LONDON
 34 Dibdin Apartments 149 Blackfriars Road LONDON
 35 Dibdin Apartments 149 Blackfriars Road LONDON
 25 Dibdin Apartments 149 Blackfriars Road LONDON
 15 Dibdin Apartments 149 Blackfriars Road LONDON
 16 Dibdin Apartments 149 Blackfriars Road LONDON
 17 Dibdin Apartments 149 Blackfriars Road LONDON
 14 Dibdin Apartments 149 Blackfriars Road LONDON
 11 Dibdin Apartments 149 Blackfriars Road LONDON
 12 Dibdin Apartments 149 Blackfriars Road LONDON
 13 Dibdin Apartments 149 Blackfriars Road LONDON
 22 Dibdin Apartments 149 Blackfriars Road LONDON
 23 Dibdin Apartments 149 Blackfriars Road LONDON
 24 Dibdin Apartments 149 Blackfriars Road LONDON
 21 Dibdin Apartments 149 Blackfriars Road LONDON
 18 Dibdin Apartments 149 Blackfriars Road LONDON
 19 Dibdin Apartments 149 Blackfriars Road LONDON
 20 Dibdin Apartments 149 Blackfriars Road LONDON
 40 Dibdin Apartments 149 Blackfriars Road LONDON
 Flat 1 96 Webber Street SE1 0QN
 Flat 2 96 Webber Street SE1 0QN
 46 Rushworth Street London SE1 0RB
 115 Blackfriars Road London SE1 8HW
 56 Dibdin Apartments 149 Blackfriars Road LONDON
 113 Blackfriars Road London SE1 8HW
 114 Blackfriars Road London SE1 8HW
 Flat 11 Pakeman House SE1 0BH
 Flat 12 Pakeman House SE1 0BH
 Flat 13 Pakeman House SE1 0BH
 Flat 10 Pakeman House SE1 0BH
 Flat 1 Pakeman House SE1 0BH
 55 Dibdin Apartments 149 Blackfriars Road LONDON
 45 Dibdin Apartments 149 Blackfriars Road LONDON
 46 Dibdin Apartments 149 Blackfriars Road LONDON
 47 Dibdin Apartments 149 Blackfriars Road LONDON
 44 Dibdin Apartments 149 Blackfriars Road LONDON
 41 Dibdin Apartments 149 Blackfriars Road LONDON
 42 Dibdin Apartments 149 Blackfriars Road LONDON
 43 Dibdin Apartments 149 Blackfriars Road LONDON
 52 Dibdin Apartments 149 Blackfriars Road LONDON
 53 Dibdin Apartments 149 Blackfriars Road LONDON
 54 Dibdin Apartments 149 Blackfriars Road LONDON
 51 Dibdin Apartments 149 Blackfriars Road LONDON
 48 Dibdin Apartments 149 Blackfriars Road LONDON

Block R Flat 9 Peabody Square SE1 8JF
 Block R Flat 6 Peabody Square SE1 8JF
 Block R Flat 3 Peabody Square SE1 8JF
 Block R Flat 4 Peabody Square SE1 8JF
 Block R Flat 5 Peabody Square SE1 8JF
 Block M Flat 4 Peabody Square SE1 8JP
 Block M Flat 5 Peabody Square SE1 8JP
 Block M Flat 6 Peabody Square SE1 8JP
 Block M Flat 3 Peabody Square SE1 8JP
 Block R Flat 10 Peabody Square SE1 8JF
 Block R Flat 11 Peabody Square SE1 8JF
 Block M Flat 2 Peabody Square SE1 8JP
 Block R Flat 2 Peabody Square SE1 8JF
 Block Q Flat 2 Peabody Square SE1 8JE
 Block Q Flat 3 Peabody Square SE1 8JE
 Block Q Flat 4 Peabody Square SE1 8JE
 Block P Flat 11 Peabody Square SE1 8JD
 Block P Flat 8 Peabody Square SE1 8JD
 Block P Flat 9 Peabody Square SE1 8JD
 Block P Flat 10 Peabody Square SE1 8JD
 Block Q Flat 9 Peabody Square SE1 8JE
 Block Q Flat 10 Peabody Square SE1 8JE
 Block Q Flat 11 Peabody Square SE1 8JE
 Block Q Flat 8 Peabody Square SE1 8JE
 Block Q Flat 5 Peabody Square SE1 8JE
 Block Q Flat 6 Peabody Square SE1 8JE
 Block Q Flat 7 Peabody Square SE1 8JE
 Block M Flat 7 Peabody Square SE1 8JP
 Block K Flat 7 Peabody Square SE1 8JW
 Block K Flat 8 Peabody Square SE1 8JW
 Block K Flat 9 Peabody Square SE1 8JW
 Block K Flat 6 Peabody Square SE1 8JW
 Block K Flat 3 Peabody Square SE1 8JW
 Block K Flat 4 Peabody Square SE1 8JW
 Block K Flat 5 Peabody Square SE1 8JW
 Suite 207 154-156 Blackfriars Road SE1 8EN
 154-156 Blackfriars Road London SE1 8EN
 Suite G05 154-156 Blackfriars Road SE1 8EN
 Suite 103 154-156 Blackfriars Road SE1 8EN
 Block K Flat 10 Peabody Square SE1 8JW
 Block K Flat 11 Peabody Square SE1 8JW
 Suite 102 154-156 Blackfriars Road SE1 8EN
 Block K Flat 2 Peabody Square SE1 8JW
 Block N Flat 2 Peabody Square SE1 8JR
 Block N Flat 3 Peabody Square SE1 8JR
 Block N Flat 4 Peabody Square SE1 8JR
 Block M Flat 11 Peabody Square SE1 8JP
 Block M Flat 8 Peabody Square SE1 8JP
 Block M Flat 9 Peabody Square SE1 8JP
 Block M Flat 10 Peabody Square SE1 8JP
 Block N Flat 9 Peabody Square SE1 8JR
 Block N Flat 10 Peabody Square SE1 8JR
 Block N Flat 11 Peabody Square SE1 8JR
 Block N Flat 8 Peabody Square SE1 8JR
 Block N Flat 5 Peabody Square SE1 8JR
 Block N Flat 6 Peabody Square SE1 8JR
 Block N Flat 7 Peabody Square SE1 8JR
 Rear Of 207 Waterloo Road SE1 8XW
 Studio 1 63 Webber Street SE1 0QW
 Ground Floor 61 Webber Street SE1 0RF
 First Floor 6-10 Valentine Place SE1 8QH
 Basement To First Floors 4 Valentine Place SE1 8RB
 Second Floor 4 Valentine Place SE1 8QH
 Ground Floor 6-10 Valentine Place SE1 8QH
 Childrens Play Centre Tadworth House Lancaster Estate SE1 0RH
 Rushworth And Friars Primary School Webber Street SE1 0RF
 First Floor 61 Webber Street SE1 0RF
 Second Floor 61 Webber Street SE1 0RF
 Ground Floor Studio 63 Webber Street SE1 0QW
 Attic 2 Valentine Place SE1 8QH
 First Floor 24-28 Rushworth Street SE1 0RB
 Second Floor 24-28 Rushworth Street SE1 0RB
 Third Floor 24-28 Rushworth Street SE1 0RB
 Ground Floor 24-28 Rushworth Street SE1 0RB
 Estate Office Pakeman House SE1 0BH
 Estate Workshop Pakeman House SE1 0BH
 First Floor 2 Valentine Place SE1 8QH
 Second Floor 2 Valentine Place SE1 8QH
 Third Floor 2 Valentine Place SE1 8QH
 Part Third Floor South 1-2 Silex Street SE1 0DP
 37 Rushworth Street London SE1 0RB
 49 Dibdin Apartments 149 Blackfriars Road LONDON
 50 Dibdin Apartments 149 Blackfriars Road LONDON
 Flat 196 Applegarth House SE1 0PZ
 Flat 197 Applegarth House SE1 0PZ
 Flat 198 Applegarth House SE1 0PZ
 Flat 195 Applegarth House SE1 0PZ
 Flat 192 Applegarth House SE1 0PZ
 Flat 193 Applegarth House SE1 0PZ
 Flat 194 Applegarth House SE1 0PZ
 Flat 203 Applegarth House SE1 0PZ
 Flat 204 Applegarth House SE1 0PZ
 Flat 205 Applegarth House SE1 0PZ
 Flat 202 Applegarth House SE1 0PZ
 Flat 199 Applegarth House SE1 0PZ
 Flat 200 Applegarth House SE1 0PZ
 Flat 201 Applegarth House SE1 0PZ
 Flat 191 Applegarth House SE1 0PZ
 Flat 181 Applegarth House SE1 0PZ
 Flat 182 Applegarth House SE1 0PZ
 Flat 183 Applegarth House SE1 0PZ
 Flat 180 Applegarth House SE1 0PZ
 Flat 177 Applegarth House SE1 0PZ
 Flat 178 Applegarth House SE1 0PZ
 Flat 179 Applegarth House SE1 0PZ
 Flat 188 Applegarth House SE1 0PZ
 Flat 189 Applegarth House SE1 0PZ
 Flat 190 Applegarth House SE1 0PZ
 Flat 187 Applegarth House SE1 0PZ
 Flat 184 Applegarth House SE1 0PZ
 Flat 185 Applegarth House SE1 0PZ
 Flat 186 Applegarth House SE1 0PZ
 Flat 206 Applegarth House SE1 0PZ
 Flat 226 Helen Gladstone House SE1 0QB
 Flat 227 Helen Gladstone House SE1 0QB
 Flat 228 Helen Gladstone House SE1 0QB
 Flat 225 Helen Gladstone House SE1 0QB
 Flat 222 Helen Gladstone House SE1 0QB
 Flat 223 Helen Gladstone House SE1 0QB
 Flat 224 Helen Gladstone House SE1 0QB
 Flat 233 Helen Gladstone House SE1 0QB
 Flat 234 Helen Gladstone House SE1 0QB
 Flat 235 Helen Gladstone House SE1 0QB
 Flat 232 Helen Gladstone House SE1 0QB
 Flat 229 Helen Gladstone House SE1 0QB
 Flat 230 Helen Gladstone House SE1 0QB
 Flat 231 Helen Gladstone House SE1 0QB
 Flat 221 Helen Gladstone House SE1 0QB
 Flat 211 Helen Gladstone House SE1 0QB
 Flat 212 Helen Gladstone House SE1 0QB
 Flat 213 Helen Gladstone House SE1 0QB
 Flat 210 Helen Gladstone House SE1 0QB
 Flat 207 Applegarth House SE1 0PZ
 Flat 208 Applegarth House SE1 0PZ
 Flat 209 Applegarth House SE1 0PZ
 Flat 218 Helen Gladstone House SE1 0QB
 Flat 219 Helen Gladstone House SE1 0QB
 Flat 220 Helen Gladstone House SE1 0QB
 Flat 217 Helen Gladstone House SE1 0QB
 Flat 214 Helen Gladstone House SE1 0QB
 Flat 215 Helen Gladstone House SE1 0QB
 Flat 216 Helen Gladstone House SE1 0QB
 Flat 176 Applegarth House SE1 0PZ
 Flat 37 Vaughan House SE1 0PY
 Flat 38 Vaughan House SE1 0PY
 Flat 39 Vaughan House SE1 0PY
 Flat 36 Vaughan House SE1 0PY
 Flat 33 Vaughan House SE1 0PY
 Flat 34 Vaughan House SE1 0PY
 Flat 35 Vaughan House SE1 0PY
 Flat 43 Vaughan House SE1 0PY
 Flat 44 Vaughan House SE1 0PY
 Flat 45 Vaughan House SE1 0PY
 Flat 42 Vaughan House SE1 0PY
 Flat 4 Vaughan House SE1 0PY
 Flat 40 Vaughan House SE1 0PY
 Flat 41 Vaughan House SE1 0PY
 Flat 32 Vaughan House SE1 0PY
 Flat 23 Vaughan House SE1 0PY
 Flat 24 Vaughan House SE1 0PY
 Flat 25 Vaughan House SE1 0PY
 Flat 22 Vaughan House SE1 0PY

Second Floor 1-2 Silex Street SE1 0DP
 Part Third Floor North 1-2 Silex Street SE1 0DP
 20 Pocock Street London SE1 0BW
 18 Pocock Street London SE1 0BW
 Newspaper House Kings Bench Street SE1 0QX
 3 Delarch House Webber Row Estate Webber Row SE1 8QU
 3a St Georges Cottages Glasshill Street SE1 0SH
 3b St Georges Cottages Glasshill Street SE1 0SH
 2 St Georges Cottages Glasshill Street SE1 0SH
 1 St Georges Cottages Glasshill Street SE1 0SH
 Flat 1b Pakeman House SE1 0BH
 2 Delarch House Webber Row Estate Webber Row SE1 8QU
 5 Delarch House Webber Row Estate Webber Row SE1 8QU
 5 St Georges Cottages Glasshill Street SE1 0SH
 6 Delarch House Webber Row Estate Webber Row SE1 8QU
 4 St Georges Cottages Glasshill Street SE1 0SH
 3c St Georges Cottages Glasshill Street SE1 0SH
 3d St Georges Cottages Glasshill Street SE1 0SH
 4 Delarch House Webber Row Estate Webber Row SE1 8QU
 1 Delarch House Webber Row Estate Webber Row SE1 8QU
 Flat 7 84 Blackfriars Road SE1 8HA
 Flat 8 84 Blackfriars Road SE1 8HA
 Flat A Alphege House SE1 0BJ
 Flat 6 84 Blackfriars Road SE1 8HA
 Flat 3 84 Blackfriars Road SE1 8HA
 Flat 4 84 Blackfriars Road SE1 8HA
 Flat 5 84 Blackfriars Road SE1 8HA
 Studio 2 63 Webber Street SE1 0QW
 Third Floor Flat 176 Blackfriars Road SE1 8ER
 Third Floor Flat 81 Blackfriars Road SE1 8HA
 Second Floor Flat 81 Blackfriars Road SE1 8HA
 Flat B Alphege House SE1 0BJ
 Basement Flat 81 Blackfriars Road SE1 8HA
 Ground Floor Flat 81 Blackfriars Road SE1 8HA
 7 Delarch House Webber Row Estate Webber Row SE1 8QU
 156 Blackfriars Road London SE1 8EN
 Basement And Part Ground Floor 88-89 Blackfriars Road SE1 8HA
 Friden House 96-101 Blackfriars Road SE1 8HL
 8 Boundary Row London SE1 8HP
 3 Kings Bench Street London SE1 0QX
 Basement And Ground Floor 176-177 Blackfriars Road SE1 8ER
 First Floor 176-177 Blackfriars Road SE1 8ER
 Second Floor 176-177 Blackfriars Road SE1 8ER
 Unit 5 109-115 Blackfriars Road SE1 8HW
 12 Delarch House Webber Row Estate Webber Row SE1 8QU
 13 Delarch House Webber Row Estate Webber Row SE1 8QU
 14 Delarch House Webber Row Estate Webber Row SE1 8QU
 11 Delarch House Webber Row Estate Webber Row SE1 8QU
 8 Delarch House Webber Row Estate Webber Row SE1 8QU
 9 Delarch House Webber Row Estate Webber Row SE1 8QU
 10 Delarch House Webber Row Estate Webber Row SE1 8QU
 19 Delarch House Webber Row Estate Webber Row SE1 8QU
 20 Delarch House Webber Row Estate Webber Row SE1 8QU
 18 Delarch House Webber Row Estate Webber Row SE1 8QU
 15 Delarch House Webber Row Estate Webber Row SE1 8QU
 16 Delarch House Webber Row Estate Webber Row SE1 8QU
 17 Delarch House Webber Row Estate Webber Row SE1 8QU
 Flat 38 Quentin House SE1 8UZ
 Flat 39 Quentin House SE1 8UZ
 Flat 40 Quentin House SE1 8UZ
 Flat 37 Quentin House SE1 8UZ
 Flat 2 Vaughan House SE1 0PY
 Flat 20 Vaughan House SE1 0PY
 Flat 21 Vaughan House SE1 0PY
 Flat 3 Vaughan House SE1 0PY
 Flat 30 Vaughan House SE1 0PY
 Flat 31 Vaughan House SE1 0PY
 Flat 29 Vaughan House SE1 0PY
 Flat 26 Vaughan House SE1 0PY
 Flat 27 Vaughan House SE1 0PY
 Flat 28 Vaughan House SE1 0PY
 Flat 46 Vaughan House SE1 0PY
 Flat 166 Applegarth House SE1 0PZ
 Flat 167 Applegarth House SE1 0PZ
 Flat 168 Applegarth House SE1 0PZ
 Flat 165 Applegarth House SE1 0PZ
 Flat 162 Applegarth House SE1 0PZ
 Flat 163 Applegarth House SE1 0PZ
 Flat 164 Applegarth House SE1 0PZ
 Flat 173 Applegarth House SE1 0PZ
 Flat 174 Applegarth House SE1 0PZ
 Flat 175 Applegarth House SE1 0PZ
 Flat 172 Applegarth House SE1 0PZ
 Flat 169 Applegarth House SE1 0PZ
 Flat 170 Applegarth House SE1 0PZ
 Flat 171 Applegarth House SE1 0PZ
 Flat 161 Applegarth House SE1 0PZ
 Flat 50 Vaughan House SE1 0PY
 Flat 51 Vaughan House SE1 0PY
 Flat 6 Vaughan House SE1 0PY
 Flat 5 Vaughan House SE1 0PY
 Flat 47 Vaughan House SE1 0PY
 Flat 48 Vaughan House SE1 0PY
 Flat 49 Vaughan House SE1 0PY
 Flat 158 Applegarth House SE1 0PZ
 Flat 159 Applegarth House SE1 0PZ
 Flat 160 Applegarth House SE1 0PZ
 Flat 157 Applegarth House SE1 0PZ
 Flat 7 Vaughan House SE1 0PY
 Flat 8 Vaughan House SE1 0PY
 Flat 9 Vaughan House SE1 0PY
 Unit 202 2-6 Boundary Row SE1 8HP
 Unit 203 2-6 Boundary Row SE1 8HP
 Unit 204 2-6 Boundary Row SE1 8HP
 Unit 201 2-6 Boundary Row SE1 8HP
 8a Lagare Apartments 51 Surrey Row SE1 0BZ
 Part Ground And Part First Floor 1 Rushworth Street SE1 0RB
 Excluding Part Ground And Part First Floor 1 Rushworth Street SE1 0RB
 Unit 209 2-6 Boundary Row SE1 8HP
 Unit 210 2-6 Boundary Row SE1 8HP
 Unit 211 2-6 Boundary Row SE1 8HP
 Unit 208 2-6 Boundary Row SE1 8HP
 Unit 205 2-6 Boundary Row SE1 8HP
 Unit 206 2-6 Boundary Row SE1 8HP
 Unit 207 2-6 Boundary Row SE1 8HP
 Ground Floor 2-6 Boundary Row SE1 8HP
 Unit 105 2-6 Boundary Row SE1 8HP
 Unit 106 2-6 Boundary Row SE1 8HP
 Unit 107 2-6 Boundary Row SE1 8HP
 Unit 104 2-6 Boundary Row SE1 8HP
 Unit 101 2-6 Boundary Row SE1 8HP
 Unit 102 2-6 Boundary Row SE1 8HP

Flat 7 Quentin House SE1 8UY
 Flat 8 Quentin House SE1 8UY
 Flat 9 Quentin House SE1 8UY
 Flat 45 Quentin House SE1 8UZ
 Flat 46 Quentin House SE1 8UZ
 Flat 47 Quentin House SE1 8UZ
 Flat 44 Quentin House SE1 8UZ
 Flat 41 Quentin House SE1 8UZ
 Flat 42 Quentin House SE1 8UZ
 Flat 43 Quentin House SE1 8UZ
 Flat 6 Quentin House SE1 8UY
 Flat 3 Quentin House SE1 8UY
 Flat 30 Quentin House SE1 8UY
 Flat 31 Quentin House SE1 8UY
 Flat 29 Quentin House SE1 8UY
 Flat 26 Quentin House SE1 8UY
 Flat 27 Quentin House SE1 8UY
 Flat 28 Quentin House SE1 8UY
 Flat 36 Quentin House SE1 8UY
 Flat 4 Quentin House SE1 8UY
 Flat 5 Quentin House SE1 8UY
 Flat 35 Quentin House SE1 8UY
 Flat 32 Quentin House SE1 8UY
 Flat 33 Quentin House SE1 8UY
 Flat 34 Quentin House SE1 8UY
 Flat 48 Quentin House SE1 8UZ
 Flat 4 Mawdley House Webber Row Estate SE1 8XQ
 Flat 5 Mawdley House Webber Row Estate SE1 8XQ
 Flat 6 Mawdley House Webber Row Estate SE1 8XQ
 Flat 3 Mawdley House Webber Row Estate SE1 8XQ
 Flat 19 Mawdley House Webber Row Estate SE1 8XQ
 Flat 2 Mawdley House Webber Row Estate SE1 8XQ
 Flat 20 Mawdley House Webber Row Estate SE1 8XQ
 Block T Flat 1 Peabody Square SE1 8HS
 Block S Flat 1 Peabody Square SE1 8HT
 Block A Flat 1 Peabody Square SE1 8HU
 Flat 7 Mawdley House Webber Row Estate SE1 8XQ
 Flat 8 Mawdley House Webber Row Estate SE1 8XQ
 Flat 9 Mawdley House Webber Row Estate SE1 8XQ
 Flat 18 Mawdley House Webber Row Estate SE1 8XQ
 Flat 53 Quentin House SE1 8UZ
 Flat 1 Mawdley House Webber Row Estate SE1 8XQ
 Flat 10 Mawdley House Webber Row Estate SE1 8XQ
 Flat 52 Quentin House SE1 8UZ
 Flat 49 Quentin House SE1 8UZ
 Flat 50 Quentin House SE1 8UZ
 Flat 51 Quentin House SE1 8UZ
 Flat 15 Mawdley House Webber Row Estate SE1 8XQ
 Flat 16 Mawdley House Webber Row Estate SE1 8XQ
 Flat 17 Mawdley House Webber Row Estate SE1 8XQ
 Flat 14 Mawdley House Webber Row Estate SE1 8XQ
 Flat 11 Mawdley House Webber Row Estate SE1 8XQ
 Flat 12 Mawdley House Webber Row Estate SE1 8XQ
 Flat 13 Mawdley House Webber Row Estate SE1 8XQ
 Flat 25 Quentin House SE1 8UY
 Flat 11 Overy House Webber Row Estate SE1 8QX
 Flat 12 Overy House Webber Row Estate SE1 8QX
 Flat 13 Overy House Webber Row Estate SE1 8QX
 Flat 10 Overy House Webber Row Estate SE1 8QX
 Flat 9 Algar House Webber Row Estate SE1 8QT
 Centre For Language In Primary Education Webber Street SE1 8QW
 Flat 1 Overy House Webber Row Estate SE1 8QX
 Flat 18 Overy House Webber Row Estate SE1 8QX
 Flat 19 Overy House Webber Row Estate SE1 8QX
 Flat 2 Overy House Webber Row Estate SE1 8QX
 Flat 17 Overy House Webber Row Estate SE1 8QX
 Flat 14 Overy House Webber Row Estate SE1 8QX
 Flat 15 Overy House Webber Row Estate SE1 8QX
 Flat 16 Overy House Webber Row Estate SE1 8QX
 Flat 8 Algar House Webber Row Estate SE1 8QT
 Flat 21 Algar House Webber Row Estate SE1 8QT
 Flat 22 Algar House Webber Row Estate SE1 8QT
 Flat 23 Algar House Webber Row Estate SE1 8QT
 Flat 20 Algar House Webber Row Estate SE1 8QT
 Flat 18 Algar House Webber Row Estate SE1 8QT
 Flat 19 Algar House Webber Row Estate SE1 8QT
 Flat 2 Algar House Webber Row Estate SE1 8QT
 Flat 5 Algar House Webber Row Estate SE1 8QT
 Flat 6 Algar House Webber Row Estate SE1 8QT
 Flat 7 Algar House Webber Row Estate SE1 8QT
 Flat 4 Algar House Webber Row Estate SE1 8QT
 Flat 24 Algar House Webber Row Estate SE1 8QT
 Unit 103 2-6 Boundary Row SE1 8HP
 Unit 112 2-6 Boundary Row SE1 8HP
 Unit 114 2-6 Boundary Row SE1 8HP
 Unit 115 2-6 Boundary Row SE1 8HP
 Unit 111 2-6 Boundary Row SE1 8HP
 Unit 108 2-6 Boundary Row SE1 8HP
 Unit 109 2-6 Boundary Row SE1 8HP
 Unit 110 2-6 Boundary Row SE1 8HP
 Unit 212 2-6 Boundary Row SE1 8HP
 Unit 404 2-6 Boundary Row SE1 8HP
 Unit 405 2-6 Boundary Row SE1 8HP
 Unit 406 2-6 Boundary Row SE1 8HP
 Unit 403 2-6 Boundary Row SE1 8HP
 Unit 315 2-6 Boundary Row SE1 8HP
 Unit 401 2-6 Boundary Row SE1 8HP
 Unit 402 2-6 Boundary Row SE1 8HP
 Unit 411 2-6 Boundary Row SE1 8HP
 First To Third Floors 8 Boundary Row SE1 8HP
 Ground Floor 8 Boundary Row SE1 8HP
 Unit 410 2-6 Boundary Row SE1 8HP
 Unit 407 2-6 Boundary Row SE1 8HP
 Unit 408 2-6 Boundary Row SE1 8HP
 Unit 409 2-6 Boundary Row SE1 8HP
 Unit 314 2-6 Boundary Row SE1 8HP
 Unit 303 2-6 Boundary Row SE1 8HP
 Unit 304 2-6 Boundary Row SE1 8HP
 Unit 305 2-6 Boundary Row SE1 8HP
 Unit 302 2-6 Boundary Row SE1 8HP
 Unit 214 2-6 Boundary Row SE1 8HP
 Unit 215 2-6 Boundary Row SE1 8HP
 Unit 301 2-6 Boundary Row SE1 8HP
 Unit 310 2-6 Boundary Row SE1 8HP
 Unit 311 2-6 Boundary Row SE1 8HP
 Unit 312 2-6 Boundary Row SE1 8HP
 Unit 309 2-6 Boundary Row SE1 8HP
 Unit 306 2-6 Boundary Row SE1 8HP
 Unit 307 2-6 Boundary Row SE1 8HP
 Unit 308 2-6 Boundary Row SE1 8HP
 Cafe 2-6 Boundary Row SE1 8HP
 Flat 20 Zeiss Court SE1 0FY
 Flat 21 Zeiss Court SE1 0FY
 Flat 22 Zeiss Court SE1 0FY
 Flat 19 Zeiss Court SE1 0FY
 Flat 16 Zeiss Court SE1 0FY
 Flat 17 Zeiss Court SE1 0FY
 Flat 18 Zeiss Court SE1 0FY
 2 Eliza House 38 Glasshill Street SE1 0QR
 3 Eliza House 38 Glasshill Street SE1 0QR
 4 Eliza House 38 Glasshill Street SE1 0QR
 1 Eliza House 38 Glasshill Street SE1 0QR
 Flat 23 Zeiss Court SE1 0FY
 Flat 24 Zeiss Court SE1 0FY
 Flat 15 Zeiss Court SE1 0FY
 Flat 5 Zeiss Court SE1 0FY
 Flat 6 Zeiss Court SE1 0FY
 Flat 7 Zeiss Court SE1 0FY
 Flat 4 Zeiss Court SE1 0FY
 Flat 1 Zeiss Court SE1 0FY
 Flat 2 Zeiss Court SE1 0FY
 Flat 3 Zeiss Court SE1 0FY
 Flat 12 Zeiss Court SE1 0FY
 Flat 13 Zeiss Court SE1 0FY
 Flat 14 Zeiss Court SE1 0FY
 Flat 11 Zeiss Court SE1 0FY
 Flat 8 Zeiss Court SE1 0FY
 Flat 9 Zeiss Court SE1 0FY
 Flat 10 Zeiss Court SE1 0FY
 5 Eliza House 38 Glasshill Street SE1 0QR
 Seventh Floor 160 Blackfriars Road SE1 8EZ
 Madano 160 Blackfriars Road SE1 8EZ
 Flat 9 Newspaper House SE1 0RB
 Unit A Newspaper House SE1 0RB
 Unit B Newspaper House SE1 0RB
 Fourth Floor 1 Valentine Place SE1 8QH
 Fifth Floor 1 Valentine Place SE1 8QH
 Sixth Floor 1 Valentine Place SE1 8QH
 Lower Ground And Ground Floors 1 Valentine Place SE1 8QH
 East Studio 2 Pontypool Place SE1 8QF
 First Floor 1 Valentine Place SE1 8QH
 Second And Third Floors 1 Valentine Place SE1 8QH
 Flat 8 Newspaper House SE1 0RB
 28a Glasshill Street London SE1 0QR

Block C Flat 10 Peabody Square SE1 8HY
 Block D Flat 9 Peabody Square SE1 8HZ
 Block D Flat 10 Peabody Square SE1 8HZ
 Block D Flat 11 Peabody Square SE1 8HZ
 Block D Flat 8 Peabody Square SE1 8HZ
 Block D Flat 5 Peabody Square SE1 8HZ
 Block D Flat 6 Peabody Square SE1 8HZ
 Block D Flat 7 Peabody Square SE1 8HZ
 Block S Flat 6 Peabody Square SE1 8HT
 Flat 4 Bridgehouse Court SE1 8HW
 Flat 5 Bridgehouse Court SE1 8HW
 Flat 6 Bridgehouse Court SE1 8HW
 Flat 3 Bridgehouse Court SE1 8HW
 39 Webber Street London SE1 8QW
 Flat 1 Bridgehouse Court SE1 8HW
 Flat 2 Bridgehouse Court SE1 8HW
 Flat 11 Bridgehouse Court SE1 8HW
 Flat 12 Bridgehouse Court SE1 8HW
 Flat 13 Bridgehouse Court SE1 8HW
 Flat 10 Bridgehouse Court SE1 8HW
 Flat 7 Bridgehouse Court SE1 8HW
 Flat 8 Bridgehouse Court SE1 8HW
 Flat 9 Bridgehouse Court SE1 8HW
 37 Webber Street London SE1 8QW
 Block U Flat 1 Peabody Square SE1 8JB
 Block U Flat 2 Peabody Square SE1 8JB
 Block U Flat 3 Peabody Square SE1 8JB
 Block O Flat 1 Peabody Square SE1 8JA
 Block B Flat 1 Peabody Square SE1 8HX
 Block C Flat 1 Peabody Square SE1 8HY
 Block D Flat 1 Peabody Square SE1 8HZ
 Block M Flat 1 Peabody Square SE1 8JP
 Block N Flat 1 Peabody Square SE1 8JR
 Block K Flat 1 Peabody Square SE1 8JW
 Block R Flat 1 Peabody Square SE1 8JF
 Block U Flat 4 Peabody Square SE1 8JB
 Block P Flat 1 Peabody Square SE1 8JD
 Block Q Flat 1 Peabody Square SE1 8JE
 Flat 14 Bridgehouse Court SE1 8HW
 Block T Flat 8 Peabody Square SE1 8HS
 Block T Flat 9 Peabody Square SE1 8HS
 Block T Flat 10 Peabody Square SE1 8HS
 Block T Flat 6 Peabody Square SE1 8HS
 Block T Flat 3 Peabody Square SE1 8HS
 Block T Flat 4 Peabody Square SE1 8HS
 Block T Flat 5 Peabody Square SE1 8HS
 Block S Flat 3 Peabody Square SE1 8HT
 Block S Flat 4 Peabody Square SE1 8HT
 Block S Flat 5 Peabody Square SE1 8HT
 Block S Flat 2 Peabody Square SE1 8HT
 Block T Flat 11 Peabody Square SE1 8HS
 Block T Flat 12 Peabody Square SE1 8HS
 Block T Flat 14 Peabody Square SE1 8HS
 Block T Flat 2 Peabody Square SE1 8HS
 Flat 19 Bridgehouse Court SE1 8HW
 Flat 20 Bridgehouse Court SE1 8HW
 Flat 21 Bridgehouse Court SE1 8HW
 Flat 18 Bridgehouse Court SE1 8HW
 Flat 15 Bridgehouse Court SE1 8HW
 Flat 16 Bridgehouse Court SE1 8HW
 Flat 17 Bridgehouse Court SE1 8HW
 Flat 26 Bridgehouse Court SE1 8HW
 Flat 27 Bridgehouse Court SE1 8HW
 Flat 28 Bridgehouse Court SE1 8HW
 Flat 25 Bridgehouse Court SE1 8HW
 Flat 22 Bridgehouse Court SE1 8HW
 Flat 23 Bridgehouse Court SE1 8HW
 Flat 24 Bridgehouse Court SE1 8HW
 Flat 236 Helen Gladstone House SE1 0QB
 9 Rushworth Street London SE1 0RB
 171a Blackfriars Road London SE1 8ER
 Unit 3 160 Blackfriars Road SE1 8EZ
 Unit 1 160 Blackfriars Road SE1 8EZ
 Unit 2 160 Blackfriars Road SE1 8EZ
 Flat 3 Globe View House SE1 8ER
 Flat 4 Globe View House SE1 8ER
 Flat 5 Globe View House SE1 8ER
 Flat 2 Globe View House SE1 8ER
 173a Blackfriars Road London SE1 8ER
 173b Blackfriars Road London SE1 8ER
 7 Glade Path London SE1 8EG
 Basement Front 82-83 Blackfriars Road SE1 8HA
 Computacenter House 100 Blackfriars Road SE1 8HL
 Basement Rear 82-83 Blackfriars Road SE1 8HA
 Retail Unit North 160 Blackfriars Road SE1 8EZ
 Retail Unit South 160 Blackfriars Road SE1 8EZ
 4 Glade Path London SE1 8EG
 5 Glade Path London SE1 8EG
 6 Glade Path London SE1 8EG
 3 Glade Path London SE1 8EG
 11 Glade Path London SE1 8EG
 1 Glade Path London SE1 8EG
 2 Glade Path London SE1 8EG
 4 Elliston Apartments 9 Glade Path SE1 8EG
 3 Buckstone Apartments 140 Blackfriars Road SE1 8BW
 4 Buckstone Apartments 140 Blackfriars Road SE1 8BW
 5 Buckstone Apartments 140 Blackfriars Road SE1 8BW
 2 Buckstone Apartments 140 Blackfriars Road SE1 8BW
 20 Elliston Apartments 9 Glade Path SE1 8EG
 21 Elliston Apartments 9 Glade Path SE1 8EG
 1 Buckstone Apartments 140 Blackfriars Road SE1 8BW
 10 Buckstone Apartments 140 Blackfriars Road SE1 8BW
 11 Buckstone Apartments 140 Blackfriars Road SE1 8BW
 12 Buckstone Apartments 140 Blackfriars Road SE1 8BW
 9 Buckstone Apartments 140 Blackfriars Road SE1 8BW
 6 Buckstone Apartments 140 Blackfriars Road SE1 8BW
 7 Buckstone Apartments 140 Blackfriars Road SE1 8BW
 8 Buckstone Apartments 140 Blackfriars Road SE1 8BW
 19 Elliston Apartments 9 Glade Path SE1 8EG
 9 Elliston Apartments 9 Glade Path SE1 8EG
 10 Elliston Apartments 9 Glade Path SE1 8EG
 11 Elliston Apartments 9 Glade Path SE1 8EG
 8 Elliston Apartments 9 Glade Path SE1 8EG
 5 Elliston Apartments 9 Glade Path SE1 8EG
 6 Elliston Apartments 9 Glade Path SE1 8EG
 7 Elliston Apartments 9 Glade Path SE1 8EG
 16 Elliston Apartments 9 Glade Path SE1 8EG
 17 Elliston Apartments 9 Glade Path SE1 8EG
 18 Elliston Apartments 9 Glade Path SE1 8EG
 15 Elliston Apartments 9 Glade Path SE1 8EG
 12 Elliston Apartments 9 Glade Path SE1 8EG
 13 Elliston Apartments 9 Glade Path SE1 8EG
 14 Elliston Apartments 9 Glade Path SE1 8EG
 11 Tadworth House Webber Street SE1 0RH
 171 Blackfriars Rd London SE1 8ER
 34 Globe View House 27 Pocock Street SE1 0FU
 Tadworth House London SE1 0RH
 Flat 37 Globe View House 27 Pocock Street SE1 0FU
 Flat 25 Patrick Court, 92 Webber Street London SE1 0GB
 27 Pocock Street 61 Globe View House SE11 4UD
 46 Globe View House 27 Pocock Street SE10FU
 46 Globe View House 27 Pocock Street SE10FU
 13 Quentin House Gray Street SE1 8UY
 Flat 24, Diddin Apartments 149 Blackfriars Road SE1 8EF
 Pocock Street London SE1 0BJ
 61 Globe View House London SE1 0FU
 Flat 68, Globe View House, 27 Pocock Street, SE1 0FU
 Globe View House London SE1 0FU
 Apt 5, 10 Rushworth Street London SE1 0RB
 Flat 12 Sharpley Court 8a Pocock Street SE1 0BJ
 Flat 32 Sharpley Court 8a Pocock Street SE1 0BJ
 13 Sharpley Court 8a Pocock St SE1 0BJ
 13 Sharpley Court 8a Pocock St SE1 0BJ
 8a Pocock Street London SE1 0BJ
 53 Globe View House 27 Pocock Street SE1 0FU
 Flat 17 171 Blackfriars Road SE1 8ER
 19 Brookhouse Avenue Leicester LE2 0JE
 Flat 29, Globe View House, 171 Blackfriars Road, SE1 8ER
 171 Blackfriars Road Flat 40 SE10FU
 Globe View House London SE1 0BZ
 Globe View House 171 Blackfriars Road SE1 8ER
 C/O Freeths
 24 Sharpley Court 8a Pocock Street SE1 0BJ
 C/O Email
 10-16 Ashwin Street Dalston E8 3DL
 11th Floor 1 Angel Court EC2R 7HJ
 4 Underwood Row London N1 7LP
 140 Southwark Bridge Road London SE1 0DG
 Flat 36 Globe View House SE1 8ER
 Flat 5, 7 Valentine Place London SE1 8QH

APPENDIX 2**Consultation responses received****Internal services**

Economic Development Team

Statutory and non-statutory organisations

Environment Agency
 London Underground Limited
 Metropolitan Police Service (Designing out Crime)
 Natural England - London Region & South East Region
 Thames Water - Development Planning

Neighbours and local groups

Apt 5, 10 Rushworth Street London SE1 0RB
 C/O Email
 Flat 12 Sharpley Court 8a Pocock Street SE1 0BJ
 Flat 15 Globe View House SE1 8ER
 Flat 17 Globe View House SE1 8ER
 Flat 17 171 Blackfriars Road SE1 8ER
 Flat 20 Globe View House SE1 8ER
 Flat 24, Didbin Apartments 149 Blackfriars Road SE1 8EF
 Flat 25 Patrick Court, 92 Webber Street London SE1 0GB
 Flat 27 Globe View House SE1 8ER
 Flat 28 Globe View House SE1 8ER
 Flat 29 Globe View House SE1 8ER
 Flat 29, Globe View House, 171 Blackfriars Road, SE1 8ER
 Flat 3 Globe View House SE1 8ER
 Flat 32 Sharpley Court SE1 0BJ
 Flat 32 Sharpley Court 8a Pocock Street SE1 0BJ
 Flat 36 Globe View House SE1 8ER
 Flat 49 Globe View House SE1 0FU
 Flat 5, 7 Valentine Place London SE1 8QH
 Flat 57 Globe View House SE1 0FU
 Flat 6 Globe View House SE1 8ER
 Flat 68, Globe View House, 27 Pocock Street, SE1 0FU
 Flat 8 84 Blackfriars Road SE1 8HA
 Flat 83 Globe View House SE1 0FU
 Globe View House London SE1 0BZ
 Globe View House London SE1 0FU
 Globe View House 171 Blackfriars Road SE1 8ER
 Pocock Street London SE1 0BJ
 Tadworth House London SE1 0RH
 10-16 Ashwin Street Dalston E8 3DL
 11 Tadworth House Webber Street SE1 0RH
 11th Floor 1 Angel Court EC2R 7HJ
 13 Sharpley Court 8a Pocock St SE1 0BJ
 13 Sharpley Court 8a Pocock St SE1 0BJ
 14 The Priory Webber Street SE1 0RQ
 140 Southwark Bridge Road London SE1 0DG
 171 Blackfriars Rd London SE1 8ER
 171 Blackfriars Road Flat 40 SE10FU
 19 Brookhouse Avenue Leicester LE2 0JE
 24 Sharpley Court 8a Pocock Street SE1 0BJ
 27 Pocock Street 61 Globe View House SE11 4UD
 34 Globe View House 27 Pocock Street SE1 0FU
 4 Underwood Row London N1 7LP
 46 Globe View House 27 Pocock Street SE10FU
 46 Globe View House 27 Pocock Street SE10FU
 53 Globe View House 27 Pocock Street SE1 0FU

61 Globe View House London SE1 0FU
7 Valentine Row London SE1 8BN
8a Pocock Street London SE1 0BJ

RECOMMENDATION

This document shows the case officer's recommended decision for the application referred to below.
This document is not a decision notice for this application.

Applicant	AG EL 160 Blackfriars Road BV	Reg. Number	18/AP/1215
Application Type	Full Planning Application	Case	TP/1390-157
Recommendation	Grant subject to Legal Agreement and GLA	Number	

Draft of Decision Notice

Planning Permission was GRANTED for the following development:

Erection of a 10 storey building (40.23m AOD) with basement, comprising a 220 bedroom hotel with ancillary restaurant (Class C1); flexible office space (Class B1); retail units (Class A1/A3); creation of public space; landscaping and associated works. Works to the existing building at ground and roof levels (including a new rooftop terrace, enclosure and PV panels); elevational alteration; creation of a new entrance and the installation of an architectural feature along the Blackfriars Road elevation.

At: 160 BLACKFRIARS ROAD AND LAND TO THE REAR, LONDON SE1 8EZ

In accordance with application received on 16/04/2018

and Applicant's Drawing Nos. Existing

10586-EPR-00-XX-TP-A-0009-SITE LOCATION PLAN; 10586-EPR-00-GF-TP-A-0010 REV 1 - RED LINE SITE PLAN; 10586-EPR-00-AA-TP-A-0013 REV 1 - EXISTING SECTION A; 10586-EPR-00-BS-TP-A-0016 REV 1 - RED LINE - EXISTING BASEMENT; 10586-EPR-00-XX-TP-A-0148 REV 1 - EXISTING SITE PLAN; 10586-EPR-00-GF-TP-A-0149 REV 1 - EXISTING SITE SURVEY; 10586-EPR-00-BS-TP-A-0150 REV 1 - EXISTING BASEMENT; 10586-EPR-00-GF-TP-A-0151 REV 1 - EXISTING GROUND FLOOR; 10586-EPR-00-XX-TP-A-0152 REV 1 - EXISTING TYPICAL FLOOR PLAN; 10586-EPR-00-RF-TP-A-0153 REV 1 - EXISTING ROOF PLAN; 10586-EPR-00-WE-TP-A-0154 REV 1 - EXISTING WEST ELEVATION ON BLACKFRIARS ROAD; 10586-EPR-00-EA-TP-A-0155 REV 1 - EXISTING EAST ELEVATION; 10586-EPR-00-AA-TP-A-0156 REV 1 - EXISTING SECTION A.

Proposed

10586-EPR-00-XX-TP-A-0101 REV 1 - PROPOSED SITE PLAN; 10586-EPR-00-WE-TP-A-0011 REV 1 - RED LINE - WEST ELEVATION ON BLACKFRIARS ROAD; 10586-EPR-00-EA-TP-A-0012 REV 1 - RED LINE - EAST ELEVATION; 10586-EPR-00-XX-TP-A-0015 REV 1 - RED LINE - VIEW FROM BLACKFRIARS ROAD; 10586-EPR-00-RF-TP-A-0014 REV 1 - RED LINE - ROOF PLAN; 10586-EPR-00-BS-TP-A-0199 REV 1 - PROPOSED BASEMENT - HOTEL; 10586-EPR-00-GF-TP-A-0200 REV 1 - PROPOSED GROUND FLOOR; 10586-EPR-00-01-TP-A-0201 REV 1 - FIRST FLOOR ROOF PLAN; 10586-EPR-00-GF-TP-A-0202 REV 1 - PROPOSED GROUND HOTEL ENTRANCE; 10586-EPR-00-GF-TP-A-0203 REV 1 - PROPOSED GROUND FLOOR - HOTEL; 10586-EPR-00-01-TP-A-0204 REV 1 - PROPOSED FIRST FLOOR; 10586-EPR-00-02-TP-A-0205 REV 1 - PROPOSED SECOND FLOOR; 10586-EPR-00-03-TP-A-0206 REV 1 - PROPOSED THIRD FLOOR; 10586-EPR-00-04-TP-A-0207 REV 1 - PROPOSED FOURTH FLOOR; 10586-EPR-00-05-TP-A-0208 REV 1 - PROPOSED FIFTH FLOOR; 10586-EPR-00-06-TP-A-0209 REV 1 - PROPOSED SIXTH FLOOR; 10586-EPR-00-07-TP-A-0210 REV 1 - PROPOSED SEVENTH FLOOR; 10586-EPR-00-08-TP-A-0211 REV 1 - PROPOSED EIGHTH FLOOR; 10586-EPR-00-09-TP-A-0212 REV 1 - PROPOSED NINTH FLOOR; 10586-EPR-00-RF-TP-A-0213 REV 1 - PROPOSED ROOF PLAN; 10586-EPR-00-WE-TP-A-0400 REV 1 - PROPOSED WEST ELEVATION ON BLACKFRIARS ROAD; 10586-EPR-00-EA-TP-A-0401 REV 1 - PROPOSED EAST ELEVATION; 10586-EPR-00-NO-TP-A-0402 REV 1 - PROPOSED NORTH ELEVATION; 10586-EPR-00-SO-TP-A-0403 REV 1 - PROPOSED SOUTH ELEVATION; 10586-EPR-00-WE-TP-A-0404 REV 1 - PROPOSED WEST ELEVATION FROM INTERNAL COURTYARD; 10586-EPR-00-XX-TP-A-0405 REV 1 - PROPOSED SERVICE YARD NORTH SIDE ELEVATION & WEST COURTYARD ELEVATION; 10586-EPR-00-XX-TP-A-0410 REV 1 - TYPICAL ELEVATION BAY; 10586-EPR-00-XX-TP-A-0412 REV 1 - TYPICAL ELEVATION DETAILS 01; 10586-EPR-00-XX-TP-A-0413 REV 1 - TYPICAL ELEVATION DETAILS 02; 10586-EPR-00-XX-TP-A-0414 REV 1 - COURT YARD ELEVATION; 10586-EPR-00-AA-TP-A-0501 REV 1 - PROPOSED SECTION A; 10586-EPR-00-BB-TP-A-0502 REV 1 - PROPOSED SECTION B; 10586-EPR-00-XX-TP-A-0510 REV 1 - PROPOSED SITE SECTIONS; 10586-EPR-XX-XX-SH-A-0701 REV 2 - ROOM CALCULATION; 10586-EPR-00-XX-SH-A-0700 REV 1 - GEA AND GIA AREA SCHEDULES; 10586-EPR-00-XX-TP-A-0009 REV 1 - RED LINE - LOCATION PLAN; 10586-EPR-00-BS-TP-A-0198 REV 1 - EXISTING BASEMENT PLAN - PROPOSED WORKS.

Documents

Air Quality Assessment For Proposed Development (april 2018); Acoustic Consultancy Report; Arboricultural Impact

Assessment; Basement Impact Assessment & Contamination Assessment; Daylight And Sunlight Assessment; Design And Access Statement; Draft Operational Management Plan; Ecological Survey; Flood Risk Assessment; Heritage Statement; Historic Environment Assessment; Hotel Demand Analysis; Hotel Socio-Economic Impact Study (12 April 2018); Outline Construction Logistics Plan (April 2018); Planning Statement; Sustainability And Energy Statement (and addendum); Servicing Management Plan & Site Waste Management Plan; Statement Of Community Involvement; Draft Travel Plan; Transport Statement.

Subject to the following thirty-one conditions:

Time limit for implementing this permission and the approved plans

- 1 Time limit
The development hereby permitted shall be begun before the end of three years from the date of this permission.

Reason
As required by Section 91 of the Town and Country Planning Act 1990 as amended.

- 2 Approved plans
The development hereby permitted shall not be carried out otherwise than in accordance with the following approved plans: 10586-EPR-00-XX-TP-A-0101 REV 1 - PROPOSED SITE PLAN; 10586-EPR-00-WE-TP-A-0011 REV 1 - RED LINE - WEST ELEVATION ON BLACKFRIARS ROAD; 10586-EPR-00-EA-TP-A-0012 REV 1 - RED LINE - EAST ELEVATION; 10586-EPR-00-XX-TP-A-0015 REV 1 - RED LINE - VIEW FROM BLACKFRIARS ROAD; 10586-EPR-00-RF-TP-A-0014 REV 1 - RED LINE - ROOF PLAN; 10586-EPR-00-BS-TP-A-0199 REV 1 - PROPOSED BASEMENT - HOTEL; 10586-EPR-00-GF-TP-A-0200 REV 1 - PROPOSED GROUND FLOOR; 10586-EPR-00-01-TP-A-0201 REV 1 - FIRST FLOOR ROOF PLAN; 10586-EPR-00-GF-TP-A-0202 REV 1 - PROPOSED GROUND HOTEL ENTRANCE; 10586-EPR-00-GF-TP-A-0203 REV 1 - PROPOSED GROUND FLOOR - HOTEL; 10586-EPR-00-01-TP-A-0204 REV 1 - PROPOSED FIRST FLOOR; 10586-EPR-00-02-TP-A-0205 REV 1 - PROPOSED SECOND FLOOR; 10586-EPR-00-03-TP-A-0206 REV 1 - PROPOSED THIRD FLOOR; 10586-EPR-00-04-TP-A-0207 REV 1 - PROPOSED FOURTH FLOOR; 10586-EPR-00-05-TP-A-0208 REV 1 - PROPOSED FIFTH FLOOR; 10586-EPR-00-06-TP-A-0209 REV 1 - PROPOSED SIXTH FLOOR; 10586-EPR-00-07-TP-A-0210 REV 1 - PROPOSED SEVENTH FLOOR; 10586-EPR-00-08-TP-A-0211 REV 1 - PROPOSED EIGHTH FLOOR; 10586-EPR-00-09-TP-A-0212 REV 1 - PROPOSED NINTH FLOOR; 10586-EPR-00-RF-TP-A-0213 REV 1 - PROPOSED ROOF PLAN; 10586-EPR-00-WE-TP-A-0400 REV 1 - PROPOSED WEST ELEVATION ON BLACKFRIARS ROAD; 10586-EPR-00-EA-TP-A-0401 REV 1 - PROPOSED EAST ELEVATION; 10586-EPR-00-NO-TP-A-0402 REV 1 - PROPOSED NORTH ELEVATION; 10586-EPR-00-SO-TP-A-0403 REV 1 - PROPOSED SOUTH ELEVATION; 10586-EPR-00-WE-TP-A-0404 REV 1 - PROPOSED WEST ELEVATION FROM INTERNAL COURTYARD; 10586-EPR-00-XX-TP-A-0405 REV 1 - PROPOSED SERVICE YARD NORTH SIDE ELEVATION & WEST COURTYARD ELEVATION; 10586-EPR-00-XX-TP-A-0410 REV 1 - TYPICAL ELEVATION BAY; 10586-EPR-00-XX-TP-A-0412 REV 1 - TYPICAL ELEVATION DETAILS 01; 10586-EPR-00-XX-TP-A-0413 REV 1 - TYPICAL ELEVATION DETAILS 02; 10586-EPR-00-XX-TP-A-0414 REV 1 - COURT YARD ELEVATION; 10586-EPR-00-AA-TP-A-0501 REV 1 - PROPOSED SECTION A; 10586-EPR-00-BB-TP-A-0502 REV 1 - PROPOSED SECTION B; 10586-EPR-00-XX-TP-A-0510 REV 1 - PROPOSED SITE SECTIONS; 10586-EPR-XX-XX-SH-A-0701 REV 2 ¿ ROOM CALCULATION; 10586-EPR-00-XX-SH-A-0700 REV 1 ¿ GEA AND GIA AREA SCHEDULES; 10586-EPR-00-XX-TP-A-0009 REV 1 ¿ RED LINE ¿ LOCATION PLAN; 10586-EPR-00-BS-TP-A-0198 REV 1 ¿ EXISTING BASEMENT PLAN - PROPOSED WORKS.

Reason:
For the avoidance of doubt and in the interests of proper planning.

Pre-commencement condition(s) - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before any work in connection with implementing this permission is

commenced.

- 3 Before any work hereby authorised begins, a detailed plan showing step free access from the basement car parking area and cycle store to ground floor level shall be submitted to and approved in writing by the Local Planning Authority.

Reason

To ensure that disabled people and the mobility impaired have appropriate means of access and egress to the basement parking areas in accordance with The National Planning Policy Framework 2012, Strategic Policy 2 - Sustainable Transport of The Core Strategy 2011 and Saved Policy 5.7 Parking standards for disabled people and the mobility impaired of the Southwark Plan 2007.

- 4 Archaeological mitigation
Before any work hereby authorised begins, the applicant shall secure the implementation of a programme of archaeological mitigation works in accordance with a written scheme of investigation, which shall be submitted to and approved in writing by the Local Planning Authority.

Reason

In order that the details of the programme of works for the archaeological mitigation are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site in accordance with Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and the National Planning Policy Framework 2012.

- 5 Archaeological mitigation
Before any work hereby authorised begins, the applicant shall secure the implementation of a programme of archaeological evaluation works in accordance with a written scheme of investigation shall be submitted to and approved in writing by the Local Planning Authority.

Reason

In order that the applicants supply the necessary archaeological information to ensure suitable mitigation measures and/or foundation design proposals be presented in accordance with Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and the National Planning Policy Framework 2012.

- 6 Swift nesting boxes
Details of Swift nesting boxes shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the development hereby granted permission.

No less than three nesting boxes shall be provided and the details shall include the exact location, specification and design of the habitats. The boxes shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained.

The Swift nesting boxes shall be installed strictly in accordance with the details so approved, shall be maintained as such thereafter.

Discharge of this condition will be granted on receiving the details of the nest/roost features and mapped locations and Southwark Council agreeing the submitted plans, and once the nest/roost features are installed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the nest/roost features have been installed to the agreed specification.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with policies: 5.10 and 7.19 of the London Plan 2016, Policy 3.28 of the Southwark Plan and Strategic Policy 11 of the Southwark Core strategy.

- 7 Bat boxes
Details of bat nesting boxes shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the development hereby granted permission.

No less than three nesting boxes shall be provided and the details shall include the exact location, specification and design of the habitats. The boxes shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained.

The nesting boxes shall be installed strictly in accordance with the details so approved, shall be maintained as such thereafter.

Discharge of this condition will be granted on receiving the details of the nest/roost features and mapped locations and Southwark Council agreeing the submitted plans, and once the nest/roost features are installed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the nest/roost features have been installed to the agreed specification.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with policies: 5.10 and 7.19 of the London Plan 2016, Policy 3.28 of the Southwark Plan and Strategic Policy 11 of the Southwark Core strategy.

8 Site Contamination - pre-approval

a) Prior to the commencement of any development, a site investigation and risk assessment shall be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site.

i) The Phase 1 (desk study, site categorisation; sampling strategy etc.) shall be submitted to the Local Planning Authority for approval before the commencement of any intrusive investigations.

ii) Any subsequent Phase 2 (site investigation and risk assessment) shall be conducted in accordance with any approved scheme and submitted to the Local Planning Authority for approval prior to the commencement of any remediation that might be required.

b) In the event that contamination is present, a detailed remediation strategy to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment shall be prepared and submitted to the Local Planning Authority for approval in writing. The scheme shall ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. The approved remediation scheme (if one is required) shall be carried out in accordance with its terms prior to the commencement of development, other than works required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority shall be given two weeks written notification of commencement of the remediation scheme works.

c) Following the completion of the works and measures identified in the approved remediation strategy, a verification report providing evidence that all works required by the remediation strategy have been completed shall be submitted to and approved in writing by the Local Planning Authority.

d) In the event that potential contamination is found at any time when carrying out the approved development that was not previously identified, it shall be reported in writing immediately to the Local Planning Authority, and a scheme of investigation and risk assessment, a remediation strategy and verification report (if required) shall be submitted to the Local Planning Authority for approval in writing, in accordance with a-c above.

Reason

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with saved policy 3.2 'Protection of amenity' of the Southwark Plan (2007), strategic policy 13' High environmental standards' of the Core Strategy (2011) and the National Planning Policy Framework 2012.

9 Basement Impact

No works shall commence until suitable investigations are undertaken to determine the ground and groundwater conditions (including levels) at the site and a Basement Impact Assessment (BIA) shall be submitted to and approved in writing by the Local Planning Authority. This should include groundwater flood risk mitigation measures as required, with the measures constructed to the approved details. The BIA shall assess if the lowest level of the basement will be above, or below the groundwater levels recorded from the ground investigations. Additionally, the BIA shall consider fluctuations in groundwater levels and the risks this can pose to the site and shall include a plan of the basement area within the boundary of the site, with any known (investigated) basements and subterranean structures adjacent to the site. This is to see if there may be a risk of obstructing groundwater flows which could potentially cause a build up of pressure on the upstream side of the subterranean structures. Further guidance on preparing BIA can be found in appendix to our SFRA 2016 here:

<https://www.southwark.gov.uk/environment/flood-risk-management/strategic-flood-risk-assessment-sfra?chapter=2>

Reason:

To minimise the potential for the site to contribute to changes in groundwater conditions and any subsequent flooding in accordance with the Southwark Strategic Flood Risk Assessment (2016).

10 Tree survey

Prior to works commencing, including any demolition, an Arboricultural Method Statement including an Arboricultural Survey shall be submitted to and approved in writing by the Local Planning Authority.

- a) A pre-commencement meeting shall be arranged, the details of which shall be notified to the Local Planning Authority for agreement in writing prior to the meeting and prior to works commencing on site, including any demolition, changes to ground levels, pruning or tree removal.
- b) A detailed Arboricultural Method Statement showing the means by which any retained trees on or directly adjacent to the site are to be protected from damage by demolition works, excavation, vehicles, stored or stacked building supplies, waste or other materials, and building plant, scaffolding or other equipment, shall then be submitted to and approved in writing by the Local Planning Authority. The method statements shall include details of facilitative pruning specifications and a supervision schedule overseen by an accredited arboricultural consultant.
- c) Cross sections shall be provided to show surface and other changes to levels, special engineering or construction details and any proposed activity within root protection areas required in order to facilitate demolition, construction and excavation.

The existing trees on or adjoining the site which are to be retained shall be protected and both the site and trees managed in accordance with the recommendations contained in the method statement. Following the pre-commencement meeting all tree protection measures shall be installed, carried out and retained throughout the period of the works, unless otherwise agreed in writing by the Local Planning Authority. In any case, all works must adhere to BS5837: (2012) Trees in relation to demolition, design and construction and BS3998: (2010) Tree work - recommendations.

If within the expiration of 5 years from the date of the occupation of the building for its permitted use any retained tree is removed, uprooted or destroyed or dies, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time, as may be specified in writing by the Local Planning Authority.

Reason

To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with The National Planning Policy Framework 2012 Parts 7, 8, 11 & 12 and policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of The Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity.

Commencement of works above grade - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before any work above grade is commenced. The term 'above grade' here means any works above ground level.

11 Material samples

Sample panels of all external facing materials including brickwork (brick, bonding, coursing), metal, glazing and cladding materials to be used in the carrying out of this permission shall be made available for inspection on site and approved by the Local Planning Authority in writing before any work in connection with this permission is carried out and the development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order to ensure that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing in accordance with The National Planning Policy Framework 2018, Strategic Policy 12 - Design and Conservation of The Core Strategy 2011 and Saved Policies: 3.12 Quality in Design and 3.13 Urban Design of The Southwark Plan 2007.

12 Green roofs

Before any above grade work hereby authorised begins, details of the biodiversity (green/brown) roof(s) shall be submitted to and approved in writing by the Local Planning Authority. The biodiversity (green/brown) roof(s) shall be:

- biodiversity based with extensive substrate base (depth 80-150mm);
- laid out in accordance with agreed plans; and
- planted/seeded with an agreed mix of species within the first planting season following the practical completion of the building works (focused on wildflower planting, and no more than a maximum of 25% sedum coverage).

The biodiversity (green/brown) roof shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency.

The biodiversity roof(s) shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.

Discharge of this condition will be granted on receiving the details of the green/brown roof(s) and Southwark Council agreeing the submitted plans, and once the green/brown roof(s) are completed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the roof has been constructed to the agreed specification.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with policies: 2.18, 5.3, 5.10, and 5.11 of the London Plan 2011, saved policy 3.28 of the Southwark Plan and Strategic Policy 11 of the Southwark Core strategy.

13 BREEAM

Before any fit out works to the commercial premises hereby authorised begins, an independently verified BREEAM report (detailing performance in each category, overall score, BREEAM rating and a BREEAM certificate of building performance) to achieve a minimum 'excellent' rating shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any such approval given;

Before the first occupation of the building hereby permitted, a certified Post Construction Review (or other verification process agreed with the local planning authority) shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed standards at (a) have been met.

Reason

To ensure the proposal complies with The National Planning Policy Framework 2012, Strategic Policy 13 - High Environmental Standards of The Core Strategy 2011 and Saved Policies 3.3 Sustainability and 3.4 Energy Efficiency of the Southwark Plan 2007.

14 Designing Out Crime

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

Reason

In pursuance of the Local Planning Authority's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention in accordance with The National Planning Policy Framework 2012, Strategic Policy 12 - Design and conservation of The Core Strategy 2011 and Saved Policy 3.14 Designing out crime of the Southwark plan 2007.

15 Cycle Storage

Before any above grade work hereby authorised begins details (1:50 scale drawings) of the facilities to be provided for the secure and covered storage of cycles shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the cycle parking facilities provided shall be retained and the space used for no other purpose and the development shall not be carried out otherwise in accordance with any such approval given.

Reason

In order to ensure that satisfactory safe and secure cycle parking facilities are provided and retained in order to encourage the use of cycling as an alternative means of transport to the development and to reduce reliance on the use of the private car in accordance with The National Planning Policy Framework 2012, Strategic Policy 2 - Sustainable Transport of The Core Strategy and Saved Policy 5.3 Walking and Cycling of the Southwark Plan 2007.

16 Hard and soft landscaping

Before any above grade work hereby authorised begins, detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings (including cross sections, surfacing materials of any parking, access, or pathways layouts, materials and edge details), shall be submitted to and approved in writing by the Local Planning Authority. The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use.

The planting, seeding and/or turfing shall be carried out in the first planting season following completion of building

works and any trees or shrubs that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the same size and species in the first suitable planting season. Planting shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction and BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf).

Reason

So that the Council may be satisfied with the details of the landscaping scheme in accordance with The National Planning Policy Framework 2012 Parts 7, 8, 11 & 12 and policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of The Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity.

Pre-occupation condition(s) - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before the building(s) hereby permitted are occupied or the use hereby permitted is commenced.

17 Refuse storage

Before the use hereby permitted begins details of the arrangements for the storing of refuse shall be submitted to and approved in writing by the Local Planning Authority and the facilities approved shall be provided and made available for use by the occupiers of the dwellings and the facilities shall thereafter be retained and shall not be used or the space used for any other purpose.

Reason

To ensure that the refuse will be appropriately stored within the site thereby protecting the amenity of the site and the area in general from litter, odour and potential vermin/pest nuisance in accordance with The National Planning Policy Framework 2012, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity and Policy 3.7 Waste Reduction of The Southwark Plan 2007

18 Commercial Kitchen Extract Ventilation - pre-approval

Prior to the commencement of use, full particulars and details of a scheme for the ventilation of the kitchen shall be submitted to and approved by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any approval given.

Reason

In order to ensure that any installed ventilation, ducting and ancillary equipment in the interests of amenity will not cause amenity impacts such as odour, fume or noise nuisance and will not detract from the appearance of the building in accordance with The National Planning Policy Framework 2012, Strategic Policy 13 - High Environmental Standards of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of The Southwark Plan 2007.

19 CHP Plant - pre approval

Before the first occupation of any of the premises that the CHP plant shall serve, the developer will provide a report advising of the full particulars of the CHP plant e.g. location, layout, operation, management plan, management responsibilities, maintenance schedule, fuel supply, height of flue, emissions impact on local air quality and proposed emission mitigation equipment. These details shall be submitted in writing to, and approved by, the LPA. The CHP plant shall not be constructed or operated other than in accordance with the LPA approval given whilst it is in commission.

Reason

In order that the Local Planning Authority may be satisfied that the operation and management of the CHP plant will be adequate and effective, to ensure the development minimises its impact on air quality and amenity in accordance with The National Planning Policy Framework 2012, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policies 3.3 Sustainability Assessment, 3.4 Energy Efficiency and 3.6 Air Quality of the Southwark Plan 2007.

20 Noise from amplified music from non-residential premises - pre approval

A scheme of sound insulation shall be installed to ensure that the LFmax sound from amplified and non-amplified music and speech shall not exceed the lowest L90 5min at 1m from the facade of nearby residential premises at all third octave bands between 63Hz and 8kHz. Prior to the commencement of use of the commercial premises (Class A3 use) the proposed scheme of sound insulation shall be submitted to the local planning authority for approval. The scheme of sound insulation shall be constructed and installed in accordance with the approval given

and shall be permanently maintained thereafter. Following completion of the development and prior to the commencement of use of the commercial premises a validation test shall be carried out. The results shall be submitted to the LPA for approval in writing.

Reason

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities associated with non-residential premises in accordance with the National Planning Policy Framework 2012, Strategic Policy 13 'High environmental standards' of the Core Strategy (2011) and saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007).

Compliance condition(s) - the following condition(s) impose restrictions and/or other requirements that must be complied with at all times once the permission has been implemented.

21 Parking permit exemption

No developer, owner or occupier of any part of the development hereby permitted, with the exception of disabled persons, shall seek, or will be allowed, to obtain a parking permit within the controlled parking zone in Southwark in which the application site is situated.

Reason

To ensure compliance with Strategic Policy 2 - Sustainable Transport of the Core Strategy 2011 and saved policy 5.2 Transport Impacts of the Southwark Plan 2007.

22 Roof plant

No roof plant, equipment or other structures, other than as shown on the plans hereby approved or approved pursuant to a condition of this permission, shall be placed on the roof or be permitted to project above the roofline of any part of the building[s] as shown on elevational drawings or shall be permitted to extend outside of the roof plant enclosure[s] of any building[s] hereby permitted.

Reason

In order to ensure that no additional plant is placed on the roof of the building in the interest of the appearance and design of the building and the visual amenity of the area in accordance with The National Planning Policy Framework 2012, Strategic Policy 12 - Design and Conservation of The Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity and 3.13 Urban Design of the Southwark Plan 2007.

23 Telecomms

Notwithstanding the provisions of Parts 24 and 25 The Town & Country Planning [General Permitted Development] Order 1995 [as amended or re-enacted] no external telecommunications equipment or structures shall be placed on the roof or any other part of a building hereby permitted.

Reason

In order to ensure that no telecommunications plant or equipment which might be detrimental to the design and appearance of the building and visual amenity of the area is installed on the roof of the building in accordance with The National Planning Policy Framework 2012, Strategic Policy 12 - Design and Conservation of The Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity and 3.13 Urban Design of the Southwark Plan 2007.

24 Commercial kitchen extract ventilation system - Terminus - standard

Any exhaust flue from the commercial kitchen shall terminate at 1m above the building eaves.

Reason

In order to ensure that any installed kitchen ventilation system will not cause a loss of amenity by reason of odour or fume, in accordance with The National Planning Policy Framework 2012, Strategic Policy 13 - High Environmental Standards of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of The Southwark Plan 2007.

25 Provision for alternatively fuelled vehicles - standard

An electric vehicle charging point shall be provided to service a minimum of 50% of the car parking spaces provided within or for the development.

Reason

To encourage the uptake of electric and hybrid vehicles and minimise the effect of the development on local air quality within the designated Air Quality Management Area in line with Policy 7.14 of the London Plan and to comply with parking standards in Policy 6.13 of the London Plan.

26 Terrace hours of use

The roof terrace on the retained office building shall be open to office workers only, and shall not be in use after 22:00 on any day. The roof terrace shall at no time be open to or used by guests of the hotel hereby permitted.

Reason:

To safeguard the amenities of neighbouring residential properties in accordance with The National Planning Policy Framework 2012, Strategic Policy 13 High environmental standards of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of The Southwark Plan 2007.

27 Hours of use - Hotel bar and restaurant

The hotel bar and restaurant shall close to non guests at 00:00 on Monday to Saturday and 23:00 on Sunday and Bank Holidays.

Reason:

To safeguard the amenities of neighbouring residential properties in accordance with The National Planning Policy Framework 2012, Strategic Policy 13 High environmental standards of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of The Southwark Plan 2007.

28 A3 use hours

The commercial A3 use hereby permitted shall not be carried on outside of the hours of 07:00 to 00:00 on Monday to Saturday and 08:00 - 23:00 on Sundays and Bank Holidays.

Reason:

To safeguard the amenities of neighbouring residential properties in accordance with The National Planning Policy Framework 2012, Strategic Policy 13 High environmental standards of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of The Southwark Plan 2007.

29 Servicing hours - standard

Any deliveries or collections to the commercial units shall only be between the following hours: 07:00 to 22:00 on Monday to Fridays, 09:00 to 20:00 Saturdays and 10:00 to 16:00 on Sundays and Bank Holidays.

Reason

To safeguard the amenity of neighbouring residential properties in accordance with The National Planning Policy Framework 2012, Strategic Policy 13 High environmental standards of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of The Southwark Plan 2007.

Other condition(s) - the following condition(s) are to be complied with and discharged in accordance with the individual requirements specified in the condition(s).

30 Archaeological reporting

Within six months of the completion of archaeological site works, an assessment report detailing the proposals for post-excavation works, publication of the site and preparation of the archive shall be submitted to and approved in writing by the Local Planning Authority and that the works detailed in this assessment report shall not be carried out otherwise than in accordance with any such approval given.

Reason

In order that the archaeological interests of the site are secured with regard to the details of the post-excavation works, publication and archiving to ensure the preservation of archaeological remains by record in accordance with Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and the National Planning Policy Framework 2012.

31 Plant Noise - pre approval

The Rated sound level from any plant, together with any associated ducting shall not exceed the Background sound level (LA90 15min) at the nearest noise sensitive premises. Furthermore, the Specific plant sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific Sound levels shall be calculated fully in accordance with the methodology of BS4142:2014. Prior to the plant being commissioned a validation test shall be carried out following completion of the development. The results shall be submitted to the LPA for approval in writing. The plant and equipment shall be installed and constructed in accordance with the approval given and shall be permanently maintained thereafter.

Reason

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the National Planning Policy Framework 2012, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved

Policy 3.2 Protection of Amenity of the Southwark Plan (2007).

Statement of positive and proactive action in dealing with the application

The Council has published its development plan and core strategy on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

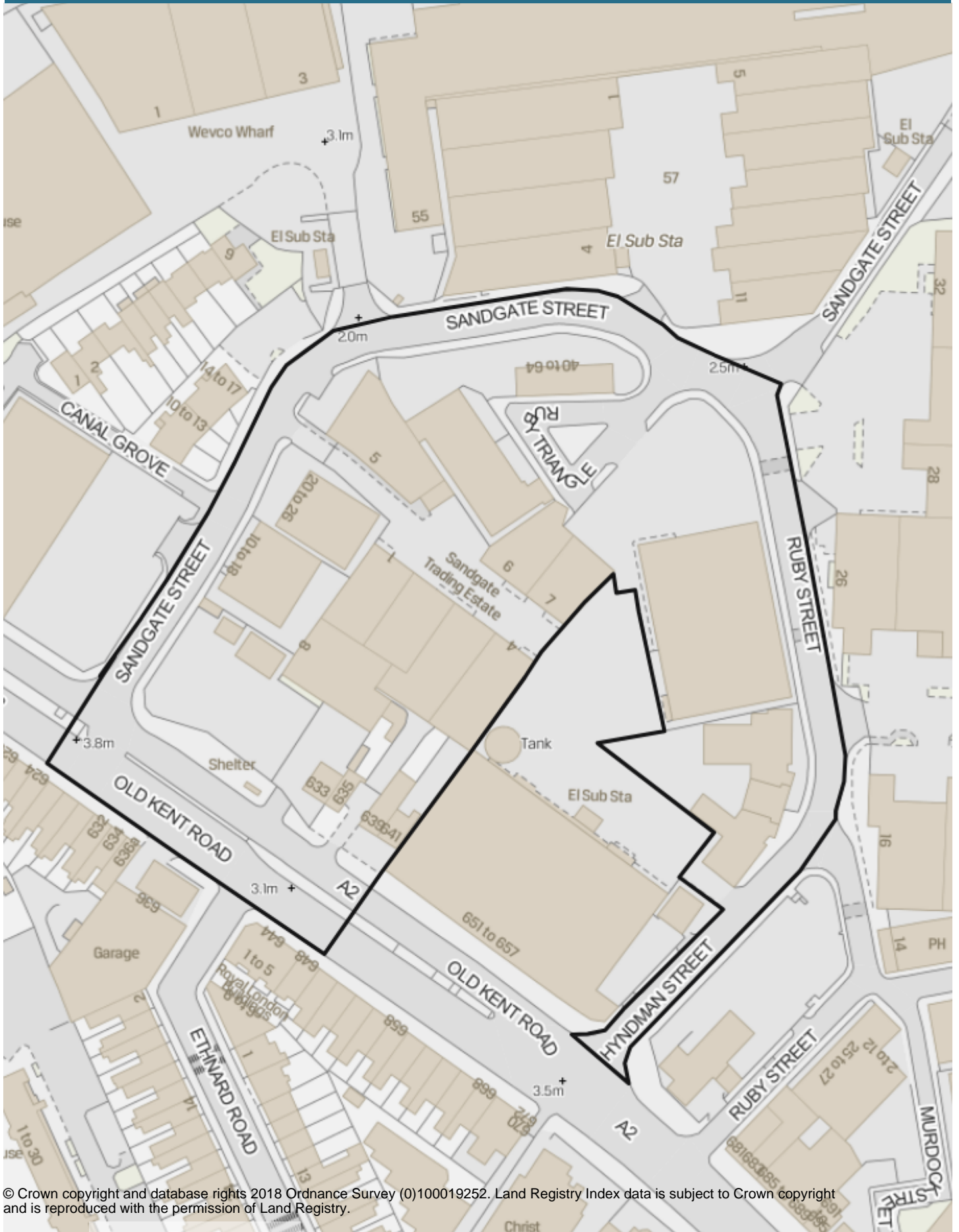
The pre-application service was used for this application and the advice given has been followed in part.

The application was validated promptly.

The application was subject to a planning performance agreement and was determined within the agreed (amended) timescale.

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RUBY TRIANGLE SITE, LAND BOUNDED BY OLD KENT ROAD, RUBY STREET AND SANDGATE STREE, SE15 1LG



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Scale = 1250

27-Sep-2018

Item No. 6.3	Classification: Open	Date: 9 October 2018	Meeting Name: Planning Committee
Report title:	<p>Development Management planning application: Application 18/AP/0897 for: Full Planning Application</p> <p>Address: RUBY TRIANGLE SITE, LAND BOUNDED BY OLD KENT ROAD, RUBY STREET AND SANDGATE STREET, LONDON SE15 1LG</p> <p>Proposal: 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 communal 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. (REVISED DESCRIPTION)</p> <p>This application represents a departure from strategic policy 10 'Jobs and Businesses' of the Core Strategy (2011) and Saved Policy 1.2 'Strategic and Local Preferred Industrial Locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location.</p>		
Ward(s) or groups affected:	Old Kent Road		
From:	Director of Planning		
Application Start Date 20/03/2018		Application Expiry Date 10/07/2018	
Earliest Decision Date 12/05/2018			

RECOMMENDATION

- That the Planning Committee grant planning permission, subject to:
 - The recommended planning conditions;
 - The applicant entering into an appropriate legal agreement by no later than 9th April 2019;
 - Referral to the Mayor of London;
 - Referral to the Secretary of State; and
 - Referral to the Health and Safety Executive (HSE).

That the environmental information be taken into account as required by Regulation 30 of the Town and Country Planning (Environmental Impact Assessments) Regulations 2017.

- That following issue of the decision it be confirmed that the Director of Planning shall place a statement on the Statutory Register pursuant to Regulation 30 of the Town and

Country Planning (Environmental Impact Assessments) Regulations and that for the purposes of Regulation 30(1)(d) the main reasons and considerations on which the Local Planning Authority's decision is based shall be set out as in this report.

3. That, in the event that the Section 106 Legal Agreement is not completed by 9th April 2019, that the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 502 of this report.

BACKGROUND INFORMATION

Site location and description

4. The site comprises an area of 1.36 hectares (ha) bound by Sandgate Street, Ruby Street and Old Kent Road. It lies within the following Southwark Plan designations;
- Partially within the Old Kent Road Strategic Industrial Location (SIL);
 - Old Kent Road Action Area (Core Area);
 - Urban Density Zone;
 - Bermondsey Lake and Old Kent Road Archaeological Priority Zones;
 - Air Quality Management Area; and
 - Flood Risk Zone 3.
5. The application site is currently occupied by a number of industrial, employment and church uses, which are contained within a range of low density, one or two storey buildings with associated hard standing. A breakdown of the existing uses on the site, both within and outside SIL, is provided in Table 1 below:

Address	Tenant (or most recent tenant)	Gross Internal Area (GIA) Sqm	Number of employees	Predominant Use Class
Existing Uses Within SIL				
1 Ruby Triangle	Southwark Metals Limited	1327.20	15	B8. Used for the transfer, storage and distribution of scrap metal with ancillary offices.
40-64 Sandgate Street	Diamond Scaffolding	167.20	7	B8. Storage of scaffolding with ancillary use of a flat for residential accommodation
7-14 Ruby Triangle	Basepoint International Unit 3	394.25		B1 Office
	Basepoint International Unit 3	394.25		D1 Church
Units 6 and 7, Sandgate Trading Estate	Basepoint International Unit 4	761	9	B1 Office
Units 3 and 4, Sandgate Trading Estate	Karel Nallet (trading as Hamilton and Palmer Coachworks)	847.40	24	B2 General Industrial
Units 2, Sandgate Trading Estate	JMBP Ltd	847.40	24	B1 Office
Unit 1,	Giorgio Viventi and	847.40	13	B1

Sandgate Trading Estate	James Viventi			Office
Unit 5, Sandgate Trading Estate	Dajon data management ltd	845.50	13	B8
25-27 Ruby Street	The Trustees of World Harvest Christian Centre	1,170.40	-	D1 Church
10-18 Sandgate Street	Ethos Group Holdings Limited	682.10	10	B8
Constantine Ltd	Constantine Ltd	655.50	10	B1 Office
Total area in SIL		8,939.6	125	
Total B-Class Area in SIL		7,374.95		
Existing Uses Outside SIL				
The Lodge, Sandgate Trading Estate	Occupied	Included above	N/A	C3 Residential
8 Sandgate Street	Vacant	847	N/A	Vacant
615-629 Old Kent Road	Enterprise Rent A Car UK Ltd.	77	5	Sui generis: Vehicle hire business
631-633 Old Kent Road	Ronald Alan Main	95	2	B1(c)
639 Old Kent Road	Trustees of Hope Cavalry Christian Centre	449	N/A	D1 Church
641 Old Kent Road	Vacant	Included in the figure above	N/A	Vacant
Total area Outside SIL		1,468	7	
Total B-Class Areas Outside SIL (including vacant units)		942		
Overall Total area		10,407.6	132	
Overall Total B-class (including vacant units)		8,316.95		

Table 1 Existing land uses in the application site

6. As Table 1 shows, the majority of existing uses on the site are B Class uses. There is a potential total of 8,316.95sqm of B class floor space on the site, if the spaces that are currently vacant are included. Of this, 7,469.95 sqm is currently in B class use (i.e. not vacant) and 7,374.95 sqm of that is found within the SIL. This does not include the existing Enterprise car hire business which is considered sui generis land use. The addendum to the submitted Environmental Statement (ES) states that these businesses provide 132 jobs on site. 125 of these jobs are located within the SIL.
7. Table 2 shows the break down of existing uses within the portion of the application site that is classified as SIL.

Within SIL	
Predominant Land Use	GIA (sqm)
B1	3,505.55
B2	847.40
B8	3,022
Total B class use within SIL	7,374.95
D1	1,564.65
Total GIA within SIL	8,939.6

Table 2 Existing land uses within the SIL

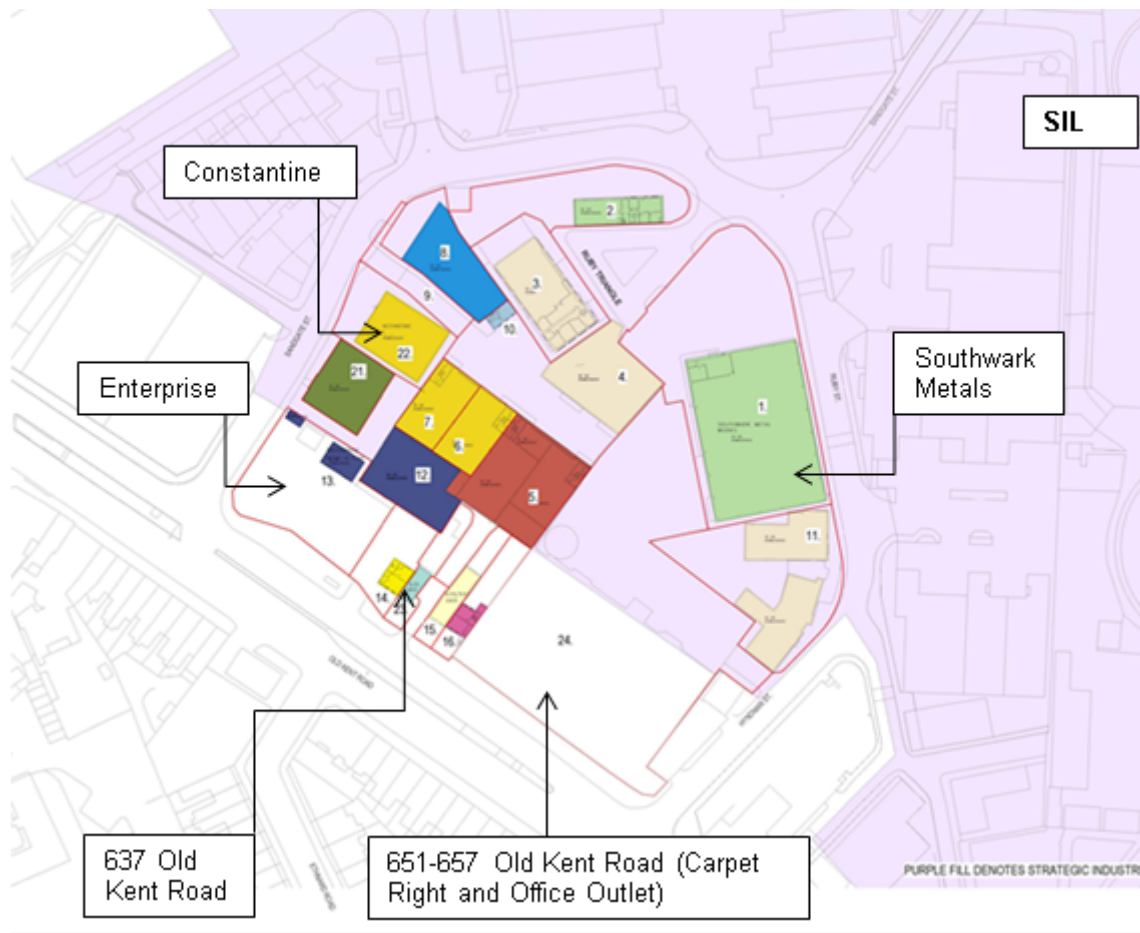


Figure 1 Existing land uses and extent of SIL

8. To the south of the site, fronting onto the Old Kent Road, there is a residential property (no.637 Old Kent Road) and a retail shed currently occupied by Carpet Right and Office Outlet stores (no. 651-657 Old Kent Road). Neither of these properties is included in the boundary of the application site.
9. The surrounding area largely consists of a mix of industrial, office and storage uses, with a very fragmented frontage along the Old Kent Road itself. To the north of the site, on the other side of Sandgate Street, is a terrace of Grade II listed cottages known as the Canal Grove Cottages. They are in residential use. To the south of the site, on the other side of the Old Kent Road, is a terrace of Edwardian buildings, including the Royal London Buildings, which are identified in the further preferred draft of the Old Kent Road Area Action Plan (OKR AAP) as being of townscape merit. To the south of this, the area becomes predominantly residential.
10. The application site is not in a conservation area and does not contain any listed

buildings. Numbers 639-641 Old Kent Road, within the site boundary, are identified in the draft OKR AAP as buildings of townscape merit. There are no trees of significant amenity value on the site but to the north, adjacent to the Canal Grove Cottages, there are 13 London Plane trees and one Common Lime tree with Tree Protection Orders (TPOs). To the east, there is a TPO London Plane tree at Unit 26 Kent Park Industrial Estate.

11. The site is located approximately 175m to the south-east of the designated major hazard site at the Old Kent Road Gasholder Station and lies within the 'Middle' HSE consultation zone.
12. National Grid is proposing to construct an electricity tunnel under part of the site. It is understood that this would be 4.5m in diameter with a 3m exclusion zone either side. The applicant has confirmed that they have been in discussion with National Grid engineers about the exact location of this tunnel and any implications on their foundation design.

Details of the Proposal

13. Full planning permission is sought for the demolition of the majority of the existing properties on the site and construction of a mixed use development comprising residential, commercial, retail and community uses. 1,152 new dwellings are proposed, 40.5% of which would be affordable (when calculated by habitable rooms). This affordable housing would be made up of a policy compliant offer of 35.1% social and intermediate units (split 71.5% social rent and 28.5% intermediate) and an "additional" 5.4% intermediate housing. Overall, 25.1% of the habitable rooms would be for social rent and 15.4% would be of intermediate tenure.
14. Table 3 sets out the proposed housing mix and tenure by split habitable rooms and Table 4 sets out the same by unit numbers.

Unit Type	Market Hab. Rooms	Social Rented Hab. Rooms	Intermediate Hab. Rooms	"Additional" Intermediate Hab. Rooms	Total Affordable Hab. Rooms	Total Hab. Rooms
Studio	16	N/A	N/A	N/A	N/A	16
1 bed	646	232	94	60	386	1,032
2 bed	1,272	421	176	108	705	1,977
3 bed	260	275	100	30	405	665
Total	2,194 (59.5%)	928 (25.1%)	370 (10%)	198 (5.4%)	1,496 (40.5%)	3,690

Table 3 Proposed housing mix and tenure by habitable room

Unit Type	Market Units	Social Rented Units	Intermediate units	"Additional" Intermediate Units	Total Affordable Units	Total Units
Studio	8	N/A	N/A	N/A	N/A	8
1 bed	323	116	47	30	193	524
2 bed	318	106	44	27	177	495
3 bed	52	55	20	6	81	133
Total	701 (60.9%)	277 (24%)	111 (9.6%)	63 (5.5%)	451 (39.1%)	1,152

Table 4 Proposed housing mix and tenure by unit

15. The proposed development would also provide a total of 10,849sqm of non residential

floor space, including a new four court public sports hall and gym facility, retail fronting onto the Old Kent Road to reinstate its High Street character and work spaces including workshops and studios. Whilst a flexible land use classification covering B1 (a), (b) and (c) is sought for the work spaces, all would be designed to a specification that could accommodate B1(c) (light industry appropriate in a residential area). There would also be a proportion of affordable work space and a 'tech incubator' space. More detail is provided on this in paragraphs 196 - 199 of this report. A full breakdown of the proposed non residential uses proposed is provided in Table 5 below:

Land Use	GIA (Sqm)	Full time jobs
Car Hire Business (re-provision) Office	118	5
Car Hire Business (re-provision) Parking	556	
Car Club Parking	397	
Retail (A1)	692	40
Flexible Retail (A1 / A2 / A3)	121	7
Flexible Food and Beverage (A3 / A4)	400	24
Cycle Hub (A1 / A3 / B1)	178	14
Business B1(a) Offices / (b) Research and Development / (c) Light Industry appropriate in a residential area	5,328	183
Church (re-provision) (D1)	425	
Sports hall and gym (D2)	1,773	10
Commercial bike store	56	
Retail bike store	16	
Shared non residential spaces (areas such as shared corridors, parking, or parts of the basement, which are used by several uses/units and cannot be classified under a specific use)	699	
Shared Plant	82	
Substation	8	
Maintenance		15
Total	10,849	298

Table 5 Proposed non residential uses

16. The total proposed B class floor space, would be 5,328 sqm GIA (not including any office or workshop associated with the cycle hub). As there is currently a total of 8,316.95sqm of B Class (or potential B class) floor space on the site, this would result in a maximum net loss of 2,988.95 sqm across the whole site. This is discussed in further detail in paragraphs 174 – 185 of this report.
17. In addition to the B class floor space outlined above, the existing Enterprise Rent a car business would be re-provided in the proposed development. Provision has been made for this business to continue trading throughout the construction period thanks to a phased relocation. This is confirmed in the revised construction phasing schedule that has been submitted and is reproduced in paragraph 27 of this report. The World Harvest Christian Centre Church has also been offered accommodation within the redevelopment. Officers are aware that negotiations are ongoing with Constantine Ltd., with the applicant having offered a number of potential long and short term relocation options.

18. The proposed buildings would be arranged in three blocks (A, B and C), around a new park at the centre of the site. The tallest building would be a maximum height of 170.83m Above Ordnance Datum (AOD) (approximately 168.41m above ground level). This would deliver 46 residential storeys on top of two storeys of commercial and community uses.
19. Block A would front onto the Old Kent Road and would consist of a basement (shared with Block B), ground floor podium (including a mezzanine floor) and part eight / part 15 residential storeys above. It would be a maximum of 64.74m AOD in height (61.58m above ground level). The basement, ground and mezzanine floors would contain the re-provided Enterprise Car Hire business, retail uses including a new convenience store and residential lobbies, cycle and refuse storage. There would be 125 residential units, with associated communal amenity space provided in roof terraces at first and tenth floor levels. The tenure of the residential units would be social rent, and it is proposed that this block would be delivered in one of the first phases of development (anticipated January 2020- March 2022).
20. Block B (Buildings B1 and B2) would front onto Sandgate Street and would consist of a basement (shared with Block A), ground and first floor podium, a floor of commercial uses at second floor level and part 12 / part 45 residential storeys above. It would contain the tallest of the proposed towers, reaching a maximum of 170.83m AOD in height (168.41m above ground level). The basement would provide plant, bulk storage and cycle storage. The ground and first floors would contain a new publicly accessible sports hall and gym facility, a tech incubator space, other commercial spaces, car parking, residential lobbies, cycle parking and refuse storage. There would be 461 residential units with associated communal amenity space provided in roof terraces at levels one and 15. The tenure of Building B1 would be intermediate and the tenure of Building B2 would be private for sale. Construction would be in a later phase of development (anticipated July 2022 to September 2026).
21. Block C (Buildings C1 and C2) would front onto Ruby Street and would consist of a ground floor podium (including mezzanine floor) and part 38 / part 28 / part 10 residential storeys above. It would be a maximum of 144.98m AOD in height (142.63m above ground level). The ground floor would contain a 'cycle hub', commercial and retail spaces, car parking, residential lobbies, cycle parking and refuse storage. The mezzanine floor would contain cycle parking and bulk storage. There would be 566 residential units with associated communal amenity provided in roof terraces at first and 12th floor levels. The tenure of the residential units would be part social rent, part intermediate and part private sale. There would be no basement, but a lift pit would need to be excavated. Construction would be in a mid phase of development (anticipated January 2020 to December 2023).

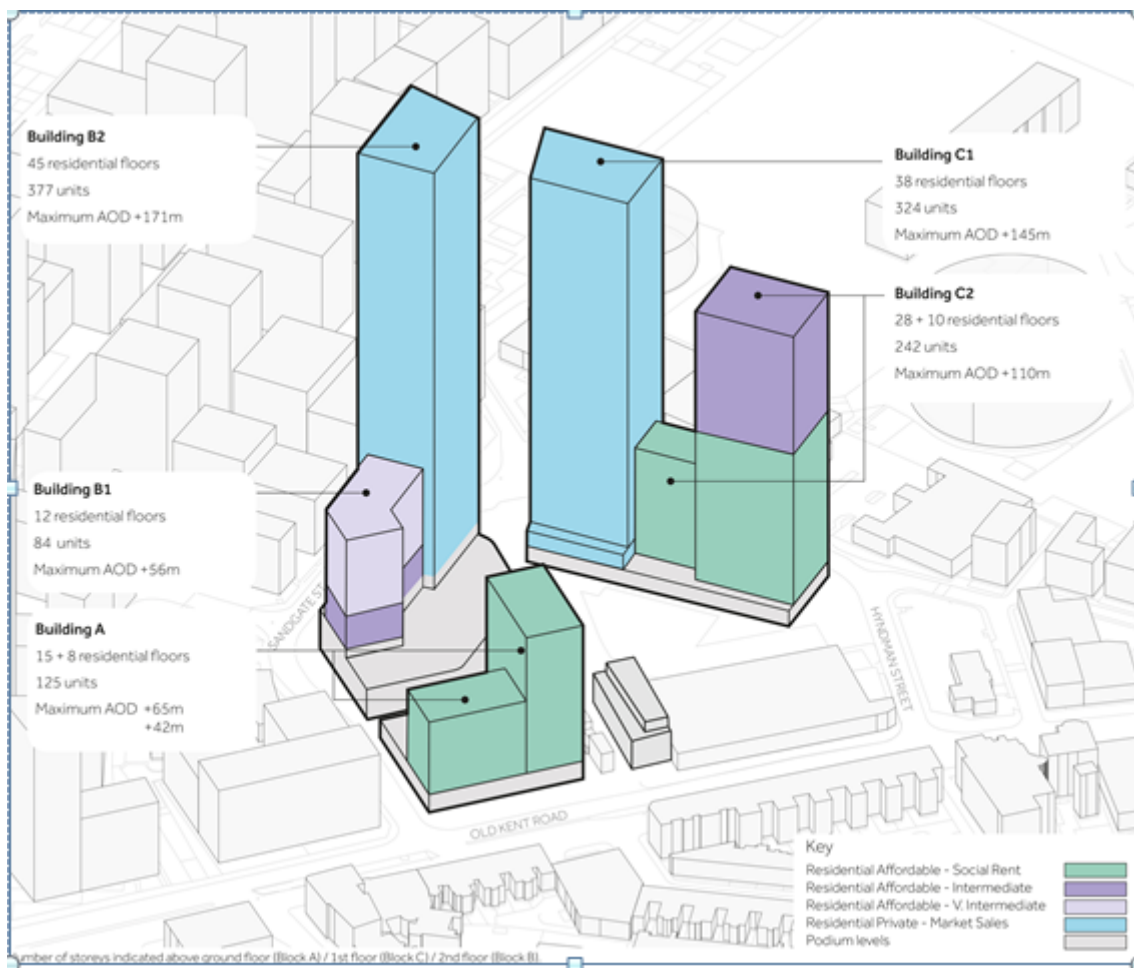


Figure 2 Proposed height, massing and tenure

22. The tenure split of each building is summarised in the following table:

Building	Social Rented	Intermediate	“Additional Intermediate”	Private	Total
A	125				125
B1		21	63		84
B2				377	377
C1				324	324
C2	152	90			242
Total	277	111	63	701	1,152

Table 6 Proposed tenure split of each block

23. The blocks would be arranged around a new park of 3,792sqm, set within a total public realm offer of 4,301sqm. The site layout would allow for future development of the neighbouring site (the Carpet Right / Office Outlet retail shed and space to the rear), in line with the indicative masterplan in the draft OKR AAP. This would almost double the area of this space. New access routes are proposed into the application site from the Old Kent Road to the south, Sandgate Street to the west and north and Ruby Street to the east. The new four court sports hall and gym facility proposed in the podium of Block B would front onto the open space with a double height glazed façade.
24. The existing buildings at 639-641 Old Kent Road, identified as being of Townscape Merit in the draft OKR AAP would be retained and extended. They would contain workspace/ studio space, with B1 (a) (b) (c) use classes applied for.

25. An on site, gas-fired, Combined Heat and Power (CHP) plant is proposed in a site wide energy centre. The energy centre would be future proofed to allow connectivity to the South East London CHP District Heating Network (SELCHP DHN) if/when this becomes available in the future. This would be secured through the Section 106 Agreement. London Borough of Southwark (LBS) Officers are working directly with Veolia to examine the feasibility of connecting all development across the Opportunity Area to SELCHP. The applicants have also met with SELCHP to look into the feasibility of connecting to this specific scheme.
26. The proposed development would be car free, with the exception of 27 car parking spaces for disabled residents. In addition, a further 43 car and van parking spaces would be provided for the re-provided Enterprise car rental business, 2 of which would be for a residents' car club. No car parking would be provided on site for the other non-residential uses proposed.
27. The proposed development would be delivered in a phased manner. The proposed phasing in the draft Construction Management Plan would be as follows:

Phase	Anticipated Dates
Relocation of Enterprise to alternative location on-site	July 2019 to September 2019
Demolition works (excluding Constantine Offices at 20-26 Sandgate Street)	July 2019 to December 2019
Enabling Works	July 2019 to December 2019
Construction Basement Block A	January 2020 to September 2020
Construction Block A	September 2020 to March 2022
Relocation of Enterprise and temporary relocation of Constantine to Block A	Early 2022
Construction basement and foundations Block C	January 2020 to June 2020
Construction Block C podium	July 2020 to March 2020
Construction Building C2	April 2021 to March 2023
Construction Building C1	April 2021 to December 2023
Construction basement and foundations Block B	July 2022 to December 2022
Construction Block B podium	January 2023 to September 2023
Relocation of Constantine to Block B podium (if required)	September 2023
Construction Building B1	October 2023 to September 2024
Construction Building B2	October 2023 to September 2026
Landscaping	April 2022 to September 2022 July 2024 to December 2024 July 2026 to December 2026

Table 7 Proposed construction phases

Amendments

28. A number of amendments were made to the scheme during the course of the application. The following list summarises the most significant of those changes:
- The amount of affordable housing proposed was increased from 35 to 40.5% following exploration of GLA grant funding;

- The amount of B class floor space was substantially increased to address concerns about the loss of employment space. This resulted in a reduction in the number of dwellings from 1,163 to 1,152, a very slight increase in the height of Block B and some changes to the external appearance of Block B (These changes were the subject of a two week re-consultation);
- The ES was substantially revised during the course of the application, resulting in a new addendum document, new and revised appendices and a new non technical summary being submitted. In line with Regulation 25 of the Town and Country Planning (Environmental Impact Assessments) Regulations, 2017 this further information and evidence was re consulted upon for 30 days;
- Revised residential layouts were prepared in consultation with officers to address, wherever possible, concerns about issues such as access to amenity space and appropriate stacking of uses;
- Revisions were made to the design of the proposed extension to 641 and 639 Old Kent Road; and
- The potential for hot food takeaways being provided on site was removed in response to concerns from LBS and GLA.

29. Pre-application discussions were held in relation to the proposal under consideration now, the details of which are held electronically by the Local Planning Authority (17/EQ/0425). The main matters discussed were around the provision of a sports hall, the loss of employment floor space, the retention of existing buildings on the site, the proposed massing (particularly in terms of impact on the Listed Canal Grove Cottages), elevational design and external appearance of the proposals, the provision of active frontages, cycle parking and the inclusion of a basement. No formal response was issued.

Relevant planning history of the application site

30. 18/AP/0111 Application type: Scoping Opinion (EIA) (SCP)
Request for a scoping opinion
Decision date 19/02/2018
Decision: Scoping Opinion Issued

Relevant planning history of adjoining sites

31. A number of recent planning applications have been made within the Old Kent Road Action Area boundary, including the following:
32. 18/AP/0196 Land bounded by Ruby Street, Murdoch Street and 685-695 Old Kent Road
Application Type: FULL

Demolition of existing buildings and construction of a building of up to 19 storeys, comprising 107 residential Private Rented Sector units, 1,227 sqm (GIA) of D1 floorspace for a church with ancillary communal facilities and 2,205 sqm (GIA) of workspace (B1 (a/b/c) Use Class) and 82 sqm (GIA) of A1/A2/B1 floorspace, with associated landscaping, car and cycle parking, servicing and refuse and recycling facilities

Decision: Yet to be determined

33. 17/AP/4596 13-14 Frensham Street, (Nyes 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)

34. 17/AP/4508 6-12 Verney Road
Application Type: FULL

Redevelopment of the site for a mixed use development comprising three buildings (Building 1: ground plus 17 storeys (AOD 66.975m); Building 2: ground plus 22 storeys (AOD 81.975m); Building 3: ground plus 16 storeys (AOD 62.275m)) to accommodate 340 residential units, A1 retail use (197.18 m² GEA), B1 office use/workspace (4435 m² GEA), D1 community use (394 m² GEA), associated cycle and car parking, servicing, refuse and recycling, landscaping including contribution towards the new Surrey Canal linear park, and private and communal residential amenity space and children's playspace.

Decision: Yet to be determined

35. 17/AP/2773 Malt Street Regeneration Site

Hybrid application comprising a full planning application for Phase 1 and outline planning permission for subsequent Phases: Full planning permission is sought for the demolition of existing buildings and structures and redevelopment of the central area (Phase 1) for the erection of 3 buildings at 6, 15 and 40 storeys (+137.070m AOD) (+ single basement) to provide 359 new homes and 1,796sqm (GEA) of non-residential floor space within classes A1-A4 (retail), class B1 (business), class D1 (community uses) and class D2 (leisure uses); an energy centre (750sqm), new public open space and public realm, associated car parking (including 4 car club spaces), 563 cycle spaces and other associated works; Outline planning permission (scale, layout, landscaping, access and appearance reserved) for the demolition of existing buildings and structures and erection of a series of buildings to provide up to 72,400sqm (GEA) of floor space ranging in height from +21.4m AOD to +111.8m AOD, comprising up to 691 residential units and up to 3,704sqm (GEA) of non-residential floor space within classes A1-A4, class B1, class D1 and class D2, with associated public open space, public realm, car parking, cycle parking and associated works.

Decision: Yet to be determined

36. 17/AP/1646 634-636 Old Kent Road

Demolition of the existing buildings to facilitate the redevelopment of the site to create 42x residential units and 272 sq m (GIA) of flexible commercial floorspace (Class A1/A2/A3/B1) in a new building of between three and six storeys in height, together with disabled car parking, cycle parking, landscaping, plant, and associated works.

Decision: Granted with legal agreement 30/11/2017

EIA Scoping Opinions have also be requested and issued for the following sites:

37. 18/AP/1913 Land at Cantium Retail Park, Old Kent Road, London, SE1 5BA

Request for a EIA Scoping Opinion in respect of the proposed demolition of existing buildings and redevelopment of the site to provide a mixed use development including new buildings ranging between 3 to 48 storeys in height providing up to 1,160 residential units (Class C3), 4,318 sq. m of office floorspace (Class B1), 2,675 sq. m of commercial

floorspace (Classes A1 - A3), 2,210 sq. m of destination space (flexible uses), together with associated car parking, landscaping and infrastructure works.

Scoping opinion issued

38. 17/AP/4234 Livesey Place and former Civic Centre Sites, 600-608 Old Kent Road, London SE15

Scoping Opinion for a Mixed-use redevelopment of sites comprising demolition of all existing buildings/structures (relocation of listed mural) and redevelopment to comprise buildings up to 40 storeys (plus basements), to provide a range of uses including residential, retail, office and a place of worship.

Scoping opinion issued

Summary of consultation responses

39. At the time of writing, a total of 34 consultation responses have been received from members of the public and local businesses and organisations. 20 of them are against the proposed development, one is a petition against the development, eleven are in favour and two make comments but neither object nor support the proposals. This includes responses that were received during, and beyond, the 30 day and two week re consultations described above.
40. The main issues raised by residents objecting to the proposed development are:
- The buildings are too tall and will harm the character or skyline;
 - Fire safety concerns associated with tall buildings;
 - There will be harmful overlooking and loss of privacy;
 - There will be a harmful loss of daylight and light and harmful overshadowing;
 - The proposal will be out of character with the surrounding area;
 - There will be increased waste/refuse;
 - There will be increased pollution;
 - It will increase demand on existing local infrastructure and facilities;
 - Not enough publicly accessible open space is proposed;
 - It will impact harmfully on the listed Canal Grove Cottages;
 - Not enough parking is proposed;
 - It will increase traffic;
 - It will increase noise;
 - It will increase light pollution;
 - There will be a loss of industrial land;
 - The proposals do not address the need for genuinely affordable housing;
 - Not enough family housing is proposed;
 - There will be harmful wind impacts on the proposed open space; and
 - The consultation has been poor, including with existing businesses on the site
41. The 'Right to Light' was also raised in some of these objections, but Members should note that this is a civil matter and is separate from daylight and sunlight as considered for planning purposes. One objection letter was received from a Right of Light surveyor appointed by a number of residents of Canal Grove. In relation to planning matters, this letter raised concerns that the daylight and sunlight assessment submitted in support of the application was undertaken without a site visit to inspect the internal arrangements of the Canal Grove properties. They requested that no decision in favour of the application be made until the applicant's surveyor visits the property to obtain the internal layout and measurements, amends their computer model and re-runs the BRE daylight and sunlight tests. They also requested a copy of the computer model and

analysis.

42. Officer Response: This letter was forwarded to the applicant's surveyors for their comment. Their response reiterates that all the assessments were undertaken in accordance with the BRE report 'Site layout planning for daylight and sunlight: A guide to good practice', more commonly known as "the BRE Guidelines" and the British Standard - BS 8206 Part 2:2008. The primary assessments advocated in the BRE Guidelines are the Vertical Sky Component ("VSC") and Annual Probable Sunlight Hours ("APSH") tests. These take the centre-point of each neighbouring window as the test-point. Therefore, the internal room dimensions are not required when undertaking these primary tests. The important relationship is the position of the neighbouring window relative to the development site when assessing VSC and APSH. In order to facilitate the daylight and sunlight assessments, a full measured survey was undertaken in December 2017 to capture the massing and position of the existing buildings that comprise the site together with the massing and position (including window apertures) of neighbouring buildings within close proximity of the site. The applicant's surveyors therefore confirm that the VSC and APSH tests have been undertaken to an extremely high level of accuracy.
43. In addition to the VSC and APSH tests, No-Sky-Line ("NSL") and Average Daylight Factor ("ADF") tests were also carried out to each of the neighbouring rooms at Canal Grove. Where this required the internal configurations of neighbouring rooms to be assumed, room depths of circa 4.2m have been applied unless the building footprint dictates otherwise. Single-aspect room-arrangements have been adopted in a 'worse-case' scenario. The applicant's surveyor confirms that layouts have been assumed in a robust way to capture the extent to which the neighbouring properties would experience change in daylight potential via the NSL and ADF tests. Room-uses have been ascertained from external observations. They also explain that, as it is not always possible to acquire information on the internal configurations for every neighbouring property under assessment, the use of assumed room layouts is standard industry practice. The applicant's agent confirmed by email that a copy of the computer model and analysis will be sent to the surveyor who wrote this objection.
44. Five of the objections have been received in the form of a standard response (some with revision and additions), stating the following:
- Not enough affordable housing is proposed. Southwark needs more affordable housing but this development proposes 65% unaffordable homes;
 - Not enough family housing is proposed Southwark needs more 3-5 bedroom homes. Only 11.5% of the new units are 3 bedroom and no 4-5 bedroom homes are proposed;
 - There will be a loss of industrial jobs;
 - It will cause a strain on public transport;
 - The development's minimum of 2,000 new residents in the area will need to use the Old Kent Road to get around by bus or car. The Old Kent Road is already congested and public transport is under strain already. More people travelling will add to the area's air pollution; and
 - The buildings are too tall. The development's 42 storey and 38 storey towers will change the skyline of the Old Kent Road. This is out of proportion within the context of the area, and better transportation is needed in the area before development on this scale can be allowed.
45. The objection in the form of a petition against the proposed development is from 'OKR People', a collective of residents, businesses and representatives of community groups which live or are active within the Old Kent Road Opportunity Area. No indication is given in the representation of the number of people or organisations that it has been sent on behalf of. The grounds for objection raised in this representation are as follows:

- 46.
- The planning application is premature and should be refused on the basis that it cannot be decided until the New Southwark Plan (“the NSP”) and the Old Kent Road Area Action Plan (“the AAP”) have been formally adopted;
 - The application should be refused because the mix of unit sizes and tenure proposed does not correspond with Southwark’s housing need, as reported in the South East London Strategic Housing Market Assessment (“the SHMA”), Strategic Policy 7 of the Core Strategy or policy H7 of the draft new London Plan;
 - As the site is located in with an Opportunity Area and Strategic Industrial Location, the threshold approach of 35% affordable housing is not appropriate for the site. Draft London Plan Policy H6 sets an affordable housing threshold of 50% for industrial land;
 - The planning application should be refused on the basis that it involves a loss of industrial floorspace in a Strategic Industrial Location;
 - The affordable or creative workspace proposed would not be appropriate for the small and medium-sized industrial uses that are currently based in the Old Kent Road area or aspire to be;
 - The planning application should be refused due to inadequate provision of active frontage, particularly concerning the Sports Hall;
 - The planning application should be refused on the basis that it fails to indicate how the bus network, which is already at capacity at peak times, will be supported to accommodate the large influx of new residents as a result of the new development prior to the Bakerloo Line Extension taking place;
 - Only providing car parking spaces for residents who may suffer from accessibility and mobility issues in the development, in an area where free on street parking is widely available, will simply mean that future occupants will park their cars on surrounding streets, resulting in competition for parking spaces with existing residents;
 - The proposed number of wheelchair accessible spaces is low, with 26 car parking spaces to be shared between a potential total of 125 wheelchair user dwellings;
 - The proposed development fails to provide sufficient and adequate green space and amenity space for occupants of the development and residents of surrounding properties; and
 - The proposals do not accord with current policy relating to tall buildings. The Old Kent Road is not identified in the Core Strategy as a location where tall buildings can be built and the design is not of the exemplary standard required.
47. Officer Response: All of the issues raised in these objections are addressed in full in the main body of this report. For reference to the specific areas raised please refer to the paragraphs identified in Table 8 below.

Issue raised	Paragraph numbers
Prematurity	161 - 162
The need for genuinely affordable housing	225 - 232
The loss of industrial land floor space	174 - 185
The relocation of existing businesses, including Southwark Metals	186 - 188
Density and over development of the site	221 - 224
Tall buildings and their impact on skyline	368 – 384 and 439 - 492
Fire Safety in tall residential buildings	528
Impact on listed buildings and other heritage assets	433 - 438
Active frontages (including the sports hall)	358 - 361
Open Space	251 - 261 and 398 - 407

Overlooking and loss of privacy	267 - 269
Daylight, sunlight and overshadowing	270 - 308
Car parking and wheelchair car parking	360 – 362
Public transport, including bus capacity	347 - 349
Traffic	335 - 338
Waste/refuse	343 and 547
Pollution and air quality	325 - 330
Demand on local facilities	551
Noise	322 - 324
Light pollution	310 - 312
Wind	313 - 321
Public consultation	567 - 568

Table 8 Relevant paragraphs of this report addressing issues raised in consultation responses

48. Constantine Ltd, the leaseholder of an existing office building on the site has written three letters against the proposed development. They raise the following issues:
- Prematurity in planning terms, as the proposals would precede the requisite Development Plan changes;
 - Insufficient open space to support buildings of the height proposed;
 - Over development of the site;
 - Impacts on the skyline,
 - Locations of tall buildings would not relate to the tall building strategy in draft OKR AAP;
 - Increased traffic;
 - Constantine’s lease runs until 2028, but the initial phasing strategy would have see their building demolished between July 2019 and December 2019;
 - The revised phasing strategy envisages Constantine being relocated into Block A in early 2022 so that their existing premises can be demolished, but they have not agreed to relocation;
 - Constantine’s preference would be to have a single move from all their premises in the Opportunity Area to a new site as soon as they can manage it, which will not be before 2023 at the earliest;
 - As such, the applicant has failed to take all reasonable steps to facilitate the successful relocation of an existing occupier;
 - And, should planning permission be granted, the need for robust planning conditions to ensure that if planning permission is granted, the impact of construction and operation of the development on Constantine Ltd. and their specific needs will not be harmful.
49. Officer Response: Where related to planning matters, these issues are addressed in full in the main body of this report. Please refer to Table 8 for the relevant paragraph numbers. With specific reference to Constantine Ltd.’s leasehold property on the site, the applicant has met with Constantine Ltd. during the course of the application and offered a number of ‘in principle’ options that would accommodate them should they decide to stay in the locality in the long term or move to an alternative location, but not in the immediate future. The applicant has also updated the proposed construction programme to take account of the remaining length of Constantine Ltd.’s lease and they have agreed to meet on a regular basis (suggested quarterly) for updates on development progress. Officers consider therefore that reasonable steps have been taken to facilitate the successful relocation of this existing occupier. In addition, a final Construction Environment Management Plan and Business Relocation and Retention Strategy would be secured by the Section 106 Legal Agreement. These documents would ensure best practice in construction, including the avoidance of harm to existing business and would be expected to address Constantine’s specific needs.

50. RTS Waste Management Ltd. a local business have written in to object to the loss of Southwark Metals, the existing scrap yard on the application site on whom they rely. They identify that this is not compliant with Policy 5.17 of the London Plan.
51. Officer Response: London Plan (2016) Policy 5.17 H requires that “if, for any reason, an existing waste management site is lost to a non-waste use, an additional compensatory site provision will be required that normally meets the maximum throughput that the site could have achieved”. Approval has recently been given for LBS to purchase land near the application site on which compensatory provision for the loss of Southwark Metals would be provided. As required by the London Plan (2016) policy, this would be addressed through LDF preparation and secured in the final OKR AAP.
52. Representatives of the Kent Park Industrial Estate, which occupies a site to the east of the application site have written to raise concerns about the potential daylight, sunlight and overshadowing impacts on any future residential scheme that may come forward on their site. Their representation raises concerns that this is not addressed in the cumulative impact assessments undertaken in the submitted ES.
53. Officer Response: The draft OKR AAP does indicate that this site has potential for high density, mixed use development, which would be supported in principle should an application come forward in the future. It is considered reasonable that these issues could be addressed in the design of any scheme that was to come forward on this site. It is not necessary for any future redevelopment proposals for this site to be assessed as cumulative development under the EIA regulations (2017), as no plans have yet been submitted and this requirement is restricted to “other existing development and/or approved development”.
54. The eleven responses received in support of the application have come from residents who live in close proximity to the application site, from residents in other areas of Southwark such as Peckham, from residents in Lewisham and from residents in other London Boroughs. Two have come from outside London. The comments received in support identify the following benefits:
- High quality architecture and design;
 - Appropriate density for a site so close to a potential Bakerloo Line Extension (BLE) station;
 - Provision of housing, jobs and businesses;
 - It will start the regeneration of the Old Kent Road; and
 - It will provide a more compelling case for the delivery of the BLE.
55. A letter in support of the application has been received from Camelot Primary School. They consider that the proposed development would improve the community through the provision of new retail and commercial frontages, bringing businesses to the area and improving local employment. They are also in support of improvements to the streetscape and public realm and the contribution of a large number of residential dwellings at a critical time for London’s housing.
56. They state that “the improvements to the local area will be very welcome for us and we know many of our families, children as well as staff members will benefit from a development of this nature.”
57. Representations have also been received from the following external and statutory consultees.

Ministry of Housing, Communities and Local Government

58. No comments to make.

GLA

59. The GLA's Stage 1 response considers that the application does not comply with the London Plan and draft new London Plan. The reasons for this, along with Officer responses, are set out below.
60. The GLA do not support the inclusion of residential units on this protected industrial site, in line with London Plan Policies 2.17 and 4.4 and draft London Plan Policy E6. They do not consider the balance of uses proposed to accord with London Plan Policy 4.4 and Policy E7 of the draft London Plan. Should the site be considered suitable for mixed-use development the GLA would expect an increase in industrial floor space to address the requirements of draft London Plan Policy E7 and the draft Old Kent Road Area Action Plan.
61. Officer Response: In response to this concern, and concerns raised by LBS Officers, the applicant has made significant revisions to the scheme, including significant increases to the quantum of B1 (c) (light industrial appropriate in a residential area) floor space and setting out a clear specification for the nature of this space. This is discussed in further detail in paragraphs 174 - 185 of this report. During informal discussions, GLA Officers have indicated that these changes address their concerns.
62. Furthermore, the GLA and LBS have now agreed an approach to phasing the release of protected industrial land for mixed use development in the Old Kent Road Opportunity Area. The application site is agreed to be in the first phase of released sites. A letter was received from the Deputy Mayor for Planning, Regeneration and Skills, dated 17th September 2018 which confirms the "agreed means for Southwark, the GLA and TfL to deliver the scale of change and quality we want to see for Old Kent Road. This agreement is very welcome, and I believe places us in the best position to continue to make the case for BLE funding to government." The letter goes on to identify detailed matters that still need to be addressed, but the Deputy Mayor states that he is "confident these final matters can be fully resolved over the coming months". We will make this letter publicly accessible on our website. Members should however note that even with this agreement in place the draft OKR AAP and New Southwark Plan (NSP) would still need to be subject to an EiP and approval of the Secretary of State before they become the adopted development plan position. It should also be noted that there have been a number of objections to the proposed release of industrial land from third parties which would need to be considered at the EiP.
63. The GLA note that the application site is within 400 metres of Camelot Primary School and St Francis Catholic Primary School, so the provision of Use Class A5 (hot food takeaways) would be contrary to Policy E9 'Retail, markets and hot food takeaways' of the draft London Plan.
64. Officer Response: In response to this concern, and concern from LBS Officers, hot food takeaways are no longer proposed as part of this development.
65. The GLA note that the application site contains or has contained a waste management facility (Southwark Metals) which London Plan Policy 5.17H and draft London Plan Policy SI19, require compensatory provision to be provided if the site were to be lost to a non-waste use. They requested full details of Southwark Metals waste throughputs going back at least 3 years, clarification of the site's existing and potential waste throughputs (broken down into individual streams and differentiating between apportioned and non-apportioned wastes), and confirmation of where and how these capacities could be re-provided elsewhere in London.

66. Officer Response: London Plan (2016) Policy 5.17 H requires that “if, for any reason, an existing waste management site is lost to a non-waste use, an additional compensatory site provision will be required that normally meets the maximum throughput that the site could have achieved”. Approval has recently been given for LBS to purchase land near the application site on which compensatory provision for the loss of Southwark Metals would be provided. As required by the London Plan (2016) policy, this would be addressed through LDF preparation and secured in the final OKR AAP. The applicant provided waste throughputs to the GLA by email on 18th June 2018.
67. It is also worth noting that the Council have agreed on a cross borough level how waste apportionment will be managed. The Integrated Waste Management Facility is the only waste site in the borough being safeguarded.
68. The GLA note that the application site is in close proximity to three gasholders which have been decommissioned, although a hazardous substance consent is still in place and falls within the Health and Safety (HSE) consultation zone and that the HSE has advised against the granting of planning permission for this development or the inclusion of a Grampian style condition. The GLA would be in support of the latter approach.
69. Officer Response: The response to the HSE’s objection is set out in paragraphs 536 – 544 of this report.
70. The GLA Stage 1 report was written before the affordable housing offer was raised from 35% to 40.5%. They noted the proposal for 35% affordable housing by habitable room with a 72/28 split in favour of social rented tenure. As the application site is industrial land and within an Opportunity Area it is subject to the GLA’s viability tested route. GLA Officers have robustly interrogated the applicant’s submitted viability assessment and concluded that, as identified by both the applicant’s viability consultant and the independent review commissioned by LBS, the scheme cannot deliver more than the 35% affordable housing proposed based on the tenure split. (As advised by email dated 17th August 2018). They did however also request that the applicant should investigate the use of grant funding to increase the affordable housing provision.
71. The GLA also require early implementation and late stage review mechanisms to be secured by the S.106 in accordance with Policy H6 of the draft London Plan. A baseline appraisal will need to be established for these review mechanisms, which the GLA advise should be based on the review carried out by GVA on behalf of LBS.
72. Officer Response: The Section 106 Legal Agreement will secure early implementation and late stage reviews with an agreed baseline. As required by the GLA, a draft of the S106 agreement will be made available to them so that they can ensure the review mechanisms have been applied. In addition, the applicant would be using GLA grant funding to increase the affordable housing offer from 35% to 40.5%.
73. The GLA raise concerns that there are instances where the number of units sharing the same core at each level exceeds the recommended eight units per core of the Mayor’s Housing SPG and that this has created a high proportion of single aspect units.
74. Officer Response: The proposed design has been revised throughout the application process to address and mitigate a number of these concerns. GLA officers have been advised of this and the ways in which the residential accommodation is considered to be of a high quality, as set out in paragraphs 245 - 247 and 242 - 243 of this report. Through informal discussions, GLA Officers have indicated that these changes address their concerns.
75. The GLA advise that consideration will need to be given to the ‘Agent of Change’ principles and the applicant must demonstrate that the scheme has been designed to

enable existing noise generating uses and activities to remain viable, and fully detail any required mitigation measures.

76. Officer Response: The Agent of Change principles are discussed in paragraph 266 of this report.
77. In relation to urban design, the GLA raised concerns about:
- How the proposals would respond to the AAP's wider pedestrian and public realm framework;
 - Small areas of inactive frontage (although they note that in general there is a good level of active frontages proposed);
 - How the sports hall frontage can positively connect with the open space;
 - How the layout, height and massing of the tall buildings have been informed by a plan-led approach; and
 - Design of the tall buildings.
78. Officer Response: These concerns are all addressed in full in the body of this report, particularly paragraphs 356 to 397. Through informal discussions, GLA Officers have indicated that these changes address their concerns.
79. The GLA requested a number of clarifications in relation to the submitted energy strategy, all of which were provided by the applicant. They also requested that continued exploration of potential connections to the South East London Combined Heat and Power (SELCHP) network should be required by condition.
80. Officer Response: The potential for the proposed development to be connected to the (SELCHP) District Heating Network will be secured through the Section 106 Legal Agreement.
81. The GLA requested further information on water consumption to demonstrate that all dwellings would achieve water consumption of 105 litres per person per day or less.
82. Officer Response: The applicant has confirmed that all dwellings would be designed to meet 105 litres per person per day (internal water usage), which is equivalent to the 'optional' requirement of the Building Regulations Part G (105 litres/person/day for internal water usage plus 5 litres/person/day for outdoor external usage = 110 litres/person/day). The specific flow rates for the sanitary ware and water consuming appliances for each of the dwelling types will be provided during the design stage. This would be required by planning condition.
83. In relation to transport, the GLA refer to TfL's consultation response, which is addressed below.
84. The GLA's Stage 1 response also identifies a number of areas in which they support the proposed development, including:
- The re-provision of the existing place of worship;
 - The proposed housing mix;
 - Introducing street frontages to the edges of the site
 - Creating an open space the heart of the site;
 - The simple form of architecture with high quality facing materials, distinction between the base, middle and tops of each building element and well-defined, deep set window reveals;
 - That the proposal would not harm the composition of strategic and local protected views;
 - That the proposal would not harm the setting of the neighbouring heritage

assets; and

- That the proposal would meet the requirements of Building Regulations Part M4(2) 'accessible and that 10% of the proposed dwellings would meet Building Regulation requirement M4(3) 'wheelchair user dwellings'

TfL

85. TfL note that there is only limited capacity on the transport network to accommodate the demand generated by additional homes and jobs in the Old Kent Road area in advance of the opening of the planned BLE. Ahead of this, some development could be accommodated through improvements to the existing primarily bus-based transport and to active travel.
86. Officer Response: As noted by TfL, The GLA, TfL and LBS are in discussions regarding an area-wide approach to increasing the capacity of the transport network.
87. TfL welcome the generous set backs of Blocks B and C to provide a more generous space for pedestrians, but raise concerns that the footway on Sandgate Street in front of Block A would only be 2.4m wide and could be obscured by on-street cycle parking stands.
88. Officer Response: 2.4m is the minimum acceptable width for footways in Southwark's Street Design Manual (SSDM). As such, this is acceptable. The precise location of cycle stands and other street furniture will be addressed through detailed design during negotiation of a Section 278 between the applicant and the council. This will be secured by the Section 106 Agreement. Such furniture will only be permitted in locations that comply with the SSDM. Transport Officers have confirmed that, subject to detailed design, the proposed development would not prevent the delivery of the Council's plans for Sandgate Street and Ruby Street.
89. TfL welcome the aspiration to introduce further on-street cycle parking and tree planting on the Old Kent Road, but note that the current design conflicts with their Healthy Streets scheme which is under design development for Old Kent Road.
90. Officer Response: The position of trees and other street furniture shown on the Old Kent Road should be thought of as indicative only. Their precise location will be agreed through Section 278 negotiations with TfL as the Highways Authority for the Transport for London Road Network (TLRN). This will be secured through the Section 106 Agreement.
91. TfL requested a financial contribution of £1,165,000 toward the cost of the Healthy Streets scheme.
92. Officer Response: Although the Council supports TfL's aspirations for the Old Kent Road Healthy Streets scheme it is currently only in feasibility stage. The developer has contributed land to facilitate the changes should they be taken forward and will be subject to S278 with both highway authorities. Surface transport infrastructure is an area covered by CIL. Officers are of the view that the improvements necessary for the Healthy Streets scheme should be secured by TfL through negotiation of a S278 legal agreement with the applicant.
93. TfL request that funding for Legible London wayfinding and improvements to local roads should also be secured.
94. Officer Response: If signage is found to be necessary in the future, it could be paid for

from the public realm contributions that will be secured through the Section 106 Agreement (see paragraphs 260 - 261 of this report for details). Improvements to local roads will be secured through Section 278 Agreements with LBS and TfL, the negotiation of which will be required by the Section 106 Agreement.

95. TfL note that generous public realm is proposed within the site (including a notional layout for the "Carpet Right" site) and that the proposed buildings will provide generally provide a good degree of natural surveillance of these spaces
96. Officer Response: Noted
97. TfL note that, whilst the proposed cycle parking appears to exceed current London Plan quantity standards, it is sub-standard in terms of accessibility and the nature of the stands proposed.
98. Officer Response: Details of the cycle parking will be agreed through a planning condition, but officers are satisfied that the material submitted demonstrates thoughtful consideration of the needs of different cyclists. There is also a proposal for a cycle hub on site, which is considered a very positive aspect of the scheme.
99. TfL note that no audit of cycling infrastructure is provided in support of the application.
100. Officer Response: This is not considered necessary
101. TfL request the provision of a suitable on-site location and funding of £220,000 for a cycle hire docking station.
102. Officer Response: Although the council supports an aspiration for an extension to the Santander cycle hire system, there is no programme to facilitate this at the moment. Docking stations would most likely be delivered after the Bakerloo Line Extension (BLE) as part of the supporting surface transport infrastructure. As such, it could be covered by the Community Infrastructure Levy (CIL). To ensure there is an option for cycle hire use in the area prior to this, Officers have requested that the applicant provide access to the dockless cycle hire schemes that will be licenced by LBS by the time of first occupation or an equivalent, acceptable cycle hire scheme. The proposal also includes a cycle hub which could also offer cycle hire to the community, including new residents. Appropriate cycle hire access would be secured through the Section 106 Agreement.
103. TfL consider the quantum of parking for people with disabilities, at 2.3% of the number of residential units proposed, to fall below the initial provision equivalent to 3% of homes required by Policy T6.1 of the London Plan and note that no evidence is provided that up to 10% could be provided at a later date if needed. They also state that the potential lease of wheelchair parking spaces to able-bodied residents would not be acceptable.
104. Officer Response: The quantum of car parking is considered sufficient because although slightly below the emerging guidance, currently there is no restriction in the surrounding borough highway for blue badge parking. To ensure the proposed wheelchair accessible parking spaces would not be leased to non wheelchair accessible units, officers have agreed that, should the spaces not be needed by disabled residents, they will be made available on a short stay basis for 'essential workers' such as carers, health visitors, plumbers and electricians or to increase cycle parking. No parking space would be allocated to a non-wheelchair accessible unit resident. This will be secured through the Section 106 Agreement.
105. TfL identify that the site is not within an existing Controlled Parking Zone (CPZ) and so there is no way of securing a car-free development. They therefore recommend that the Council secures funding for a new CPZ or extension to a nearby CPZ.

106. Officer Response: This is being explored and there will be a clause in the Section 106 Agreement preventing residents or occupiers of the proposed development from obtaining residents parking permits for any future CPZ. The Council has made the developer aware of its emerging plans for the Sandgate Road area and that it is likely to include the introduction of parking controls and will include this into the S278 agreement
107. TfL note that electric vehicle charging points are proposed to meet the London Plan minimum standards but would encourage provision of a greater proportion.
108. Officer Response: The number of Electric Vehicle (EV) charging points is policy compliant and therefore acceptable. The council is in the process of rolling out EV charging points in lamp columns across the borough and it is likely that some will be in walking distance of this site by the time it is occupied.
109. TfL request a contribution of £1,108,125 per year, for five years to fund the cost of 12.3 additional peak hour bus journeys.
110. Officer Response: Increased and improved bus services are needed to accommodate growth in the Old Kent Road Opportunity Area prior to the arrival of the Bakerloo Line Extension (BLE) and developers will be expected to fund adequate mitigation in advance of its delivery. LBS Officers are working with TfL to produce a phasing plan which will ensure this happens. It will require contributions from developers to pay for additional bus services. The LBS Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD (2015) is clear and transparent in what it expects development to deliver for local people and these contributions need to be subject to the same rigour. In addition, as the collecting and enforcing authority for the Section 106 Agreement, LBS need to know that the contributions requested pass the Section 106 tests and are fair and proportionate and reasonably related to mitigating the impacts of each individual scheme. If this is not confirmed according to a clear evidence base setting out exactly what is required and what can be accommodated, any contributions may be subject to challenge. LBS officers are therefore working with TfL to set out a strategy that is deliverable, transparent and can be seen by local people and developers alike to address concerns about bus capacity and overcrowding.
111. TfL welcome the framework travel plan but consider that it requires more work before being fully acceptable.
112. Officer Response: Southwark Transport Planning Officers no longer require Travel Plans. The proposed Delivery Service Plan (DSP) bond is considered a more robust approach. More detail is provided on this in paragraphs 343 - 346 of this report.
113. TfL raise concerns about servicing the scheme from the street and whether this is sufficient given the anticipated road scheme promoted by LBS.
114. Officer Response: The DSP addresses this issue and is considered acceptable by Officers. As set out in paragraphs 343 - 346, a financial bond will be secured against it.
115. TfL note that a good draft Construction Management Plan is supplied but further details should be secured by condition.
116. Officer Response: A final Construction Management Plan will be secured by the Section 106 Legal Agreement.

London Underground

117. No comments to make on the application.

Metropolitan Police

118. The Designing Out Crime Officer has met with the applicant and is satisfied that, should this application proceed, it should be able to achieve the security requirements of Secured by Design with the guidance of both Secured by Design Homes 2016 and Commercial 2015 guides. Conditions requiring the proposed development to adhere to the principles and physical security requirements of Secured By Design are recommended.
119. Officer Response: The recommended conditions are included with this recommendation.
120. A planning consultancy called Lambert Smith Hampton has requested that the development incorporate a Metropolitan Police Dedicated Ward Office (DWO). A DWO is a 20 -50 sqm space with secure lockers, showers, toilets, cooking facilities and access to Wi-Fi and charging facilities.
121. Officer Response: Officers gave this request careful consideration, but decided that there are more suitable sites in the OKR Opportunity Area for such a facility. Officers have contacted to planning consultants to discuss these options and will continue to monitor this need.

Natural England

122. No comments to make on the application

Environment Agency

123. Planning permission should only be granted subject to the conditions recommended.

Officer Response: The recommended conditions are included.

124. Health and Safety Executive (HSE)

125. The HSE consider that there are sufficient reasons, on safety grounds, for advising against the granting of planning permission in this case. They would not advise against the granting of planning permission for the proposed development if a condition were to be attached to the permission, so as to prevent the occupation of any of the buildings until the hazardous substances consent for the Old Kent Road Gas Holder Station has been revoked.
126. If planning permission is granted without the above condition, the local planning authority is required to give HSE advance notice of when it is minded to grant planning permission against HSE's advice, and allow 21 days from that notice for HSE to consider whether to request that the Secretary of State for Communities and Local Government call-in the application for their own determination.
127. Officer response: These issues are discussed in detail in paragraphs 536 - 544 of this report. In summary, given that the Gas Holder station is no longer operational, and that two of the gas holders have now been demolished, it is not considered that it would be proportionate to refuse planning permission on the basis that the hazardous substances licence has not yet been revoked. For the same reasons, it is also considered that the condition recommended by the HSE would be unnecessarily punitive, and is therefore not included with this recommendation. Any resolution to grant planning permission would be referred to the HSE as requested.

Historic England (HE)

128. HE advise that this application is the latest in a succession of tall building proposals along the Old Kent Road, which is of growing concern to them. Tall building development should follow a plan-led approach rather than a reaction to speculative development applications. However, we note that there is not currently an adopted policy for tall building development along the Old Kent Road.
129. Officer Response: The draft OKR AAP includes a tall building strategy. This plan has reached the 'Preferred Option' stage, and the Council consulted on it between December 2017 and March 2018. Adoption of the plan is expected in 2019. It is however agreed that this plan is not adopted, and as it is still in draft form, it can only be attributed very limited weight in determining applications. The assessment of the tall buildings proposed is set out in paragraphs 368 – 384 of this report.
130. HE considers that this proposal would have major townscape impact in a wide range of views, many of which would be harmful to the historic environment. They consider the most significant impact to be on:
- Cobourg Road Conservation Area: The proposed development would rise substantially above the existing tree and roofline of otherwise unspoilt views from Burgess Park towards the Conservation Area resulting in a dominant intrusion on the skyline;
 - Glengall Road Conservation Area: The proposed development would break the unobstructed roofline at the corner of Glengall Road and Glengall Terrace which would detract from the historic streetscape of these Grade II listed terraces;
 - Caroline Gardens Conservation Area: The proposed development, although peripheral to important views of the listed almshouses would exacerbate the existing impact presented by the existing tower blocks;
 - Parliament Hill (London View Management Framework (LVMF) View 2A.1): The proposed development, whilst peripheral to the central viewing corridor, would add to the existing tall buildings which currently encroach on the dome of St Paul's Cathedral in this important view. Whilst not a major impact, HE consider that this would result in some incremental harm to the setting of St Paul's Cathedral.
131. Officer Response: The impact of the proposed development on sensitive views is assessed in paragraphs 439 - 492 of this report. It is also worth noting that the GLA do not consider that the proposed development would result in any harm to the strategic views in the LVMF.
132. In conclusion, HE considers that the proposed development would fail to preserve both the setting of the listed buildings mentioned above and the character of the conservation areas identified. They do not consider the level of harm to any individual designated heritage asset to be 'substantial' in NPPF terms, but they do consider that the cumulative impact of the development to be of concern. They also express concerns about the consideration of this application in the absence of an adopted strategy for the area.

National Air Traffic Services (NATS)

133. Initially, NATS submitted an objection to the application, based on preliminary technical findings. They subsequently came to the view that the design could be changed to modify its impact on radar equipment and therefore withdrew their objection subject to the inclusion of standard radar mitigation conditions.
134. Officer Response: The recommended conditions are included.

Arquiva

135. Arquiva have no objection to the proposed development in relation to the terrestrial television broadcast network and radio broadcast networks they operate. They do however note that there is potential for some interference with viewer reception. This is a separate issue and they recommend that the Council needs to consider whether it is appropriate to impose a condition or obligation by way of planning agreement to ensure the necessary surveys and mitigation measures to address this.
136. Officer response: The recommended conditions are included.

Thames Water

137. Thames Water does not have any objection with regard to the combined water network infrastructure capacity.
138. Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. As such, they have requested a condition preventing any properties being occupied until confirmation has been provided that either all water network upgrades required to accommodate the additional flows from the development have been completed; or a housing and infrastructure phasing plan has been agreed with Thames Water.
139. The magnitude of this development is such that significant water network and treatment infrastructure upgrades will be required to accommodate the development. As such, Thames Water have also requested a condition requiring an integrated water management strategy to ensure that sufficient capacity is made available to cater for the new development.
140. They also advise that there are water mains crossing or close to the proposed development. Construction over or within 3m of water mains is not permitted. The applicant must check that the proposed development wouldn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way.
141. The proposed development is also located within 15m of underground water assets and as such, Thames Water has requested an informative relating to this. For the information of the developer, they also note that there is a 100mm Ductile Iron (DI) private main crossing the development site.
142. In relation to waste, Thames Water is currently liaising with the developer via the pre-development enquiry process to confirm the point of connection to the public combined sewer.
143. Officer Response: Recommended conditions and informatives included. It should also be noted that an Opportunity Area-wide Integrated Water Management Strategy (IWMS) is currently being produced.
144. 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	Approve subject to conditions	Recommended conditions included
Local Economy Team (LET)	Approve subject to recommended contributions	Recommended contributions to be secured through the S106
Environmental Protection	Approve subject to conditions	Recommended conditions

Team (EPT)		included with this report, or as clauses in S106.
Ecology Team	Approve subject to conditions	Recommended conditions included
Flood risk and drainage team	Dan seeking clarification BIA condition?	Approve subject to conditions
Transport	Approve subject to conditions and Section 106 clauses.	Recommended conditions included with this report, or as clauses in S106
Highways	Approve subject to agreement to enter into S278 Agreement.	Requirement for S278 Agreement will be secured through S106.
Public Health	Approve subject to condition requiring a Health Impact Assessment and implementation of all mitigation proposed therein.	Recommended condition included.
Planning Policy	Advice given on emerging policy and waste apportionment	Advice included in relevant paragraphs of this report.
Archaeology	Approve subject to conditions	Recommended conditions included

Table 9 Summary of LBS officer consultation responses

KEY ISSUES FOR CONSIDERATION

Summary of main issues

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

- Principle of the proposed land use, including emerging policy for the Old Kent Road;
- Environmental Impact Assessment;
- Design;
- Townscape and impact upon the setting of adjacent listed buildings;
- Density;
- Affordable housing;
- Housing mix;
- Quality of accommodation;
- Wheelchair accessible housing;
- Impact of proposed development on amenity of adjoining occupiers and surrounding area;
- Transport;
- Noise and vibration;
- Trees and landscaping;
- Planning obligations (S.106 undertaking or agreement);
- Southwark and Mayoral Community Infrastructure levy;
- Sustainable development implications;
- Ecology;
- Contaminated land;
- Air quality;
- Water resources and flood risk;
- Archaeology;
- Wind;
- Health impact;
- Equalities and human rights; and

- Statement of community involvement

Legal context

146. 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.

Planning policy

National Planning Policy Framework (the Framework)

147. National planning policy is set out in the revised National Planning Policy Framework ('the NPPF'), published on 24 July 2018. The NPPF focuses on a presumption in favour of sustainable development, of which there are three strands; economic, social and environmental. The core planning principles include, amongst others, the requirement to 'drive and support development'.
148. Paragraph 48 of the revised NPPF states that weight can be afforded to relevant policies in emerging plans depending on the stage of preparation of the plan. The council is preparing the New Southwark Plan (NSP) and OKR AAP which are emerging policy documents. The new London Plan is also in draft form. The weight that can be afforded to these emerging documents is discussed in greater detail in paragraphs 157 - 162 of this report.

Section 5 - Delivering a sufficient supply of homes

Section 6 - Building a strong, competitive economy

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

National Planning Policy Guidance (2014)

The London Plan 2016

149. The London Plan is the regional planning framework and was adopted in 2016.

Policy 2.17 Strategic Industrial locations

Policy 3.3 Increasing housing supply

Policy 3.5 Quality and design of housing developments

Policy 3.6 Children and young people's play and informal recreation facilities

Policy 3.8 Housing choice

Policy 3.9 Mixed and balanced communities

Policy 3.10 Definition of affordable housing

Policy 3.11 Affordable housing targets

Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes

Policy 3.13 Affordable housing thresholds

Policy 4.3 Mixed use development and offices

Policy 4.4 Managing industrial land and premises

Policy 5.7 Renewable energy

Policy 5.8 Innovative energy technologies

Policy 5.11 Green roofs and development site environs
 Policy 5.12 Flood risk management
 Policy 5.13 Sustainable drainage
 Policy 5.21 Contaminated land
 Policy 6.9 Cycling
 Policy 6.10 Walking
 Policy 6.13 Parking
 Policy 7.2 An inclusive environment
 Policy 7.3 Designing out crime
 Policy 7.4 Local character
 Policy 7.6 Architecture
 Policy 7.8 Heritage assets and archaeology
 Policy 7.21 Trees and woodlands
 Policy 8.2 Planning obligations
 Policy 8.3 Community infrastructure levy

150. The London Plan 2016 identifies the Old Kent Road as an Opportunity Area with “significant potential for residential – led development along the Old Kent Road corridor” and identified an indicative employment capacity of 1,000 and a minimum of 2,500 new homes. Opportunity areas are described in the London Plan 2016 as London’s major reservoirs of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility.

151. Policy 2.13 in the London Plan 2016 sets out the strategic policy for the development and intensification of opportunity areas. Annex 1 includes an indicative capacity for Old Kent Road of 2,500 homes and 1,000 jobs and supports the development of a planning framework to realise the area’s full growth potential. It goes on to state that the employment and minimum homes figures should be explored further and refined in a planning framework for the area and through a review of the Strategic Industrial Location and capacity to accommodate a phased rationalisation of its functions in the opportunity area or a provision elsewhere.

152. Core Strategy 2011

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

Southwark Plan 2007 (July) - saved policies

153. The adopted local plan for Southwark includes the saved policies from the 2007 Southwark Plan in addition to the 2011 Core Strategy including its strategic policies.

154. The council's cabinet on 19 March 2013, as required by paragraph 215 of the NPPF, considered the issue of compliance of Southwark Planning Policy with the National Planning Policy Framework. All policies and proposals were reviewed and the Council satisfied itself that the policies and proposals in use were in conformity with the NPPF. The resolution was that with the exception of Policy 1.8 (location of retail outside town centres) in the Southwark Plan all Southwark Plan policies are saved. Therefore due

weight should be given to relevant policies in existing plans in accordance to their degree of consistency with the NPPF.

- 1.1 - Access to employment opportunities
- 1.2 - Strategic and local preferred industrial locations
- 1.5 - Small businesses
- 2.5 - Planning obligations
- 3.2 - Protection of amenity
- 3.3 - Sustainability assessment
- 3.4 - Energy efficiency
- 3.6 - Air quality
- 3.7 - Waste reduction
- 3.9 - Water
- 3.11 - Efficient use of land
- 3.12 - Quality in design
- 3.13 - Urban design
- 3.14 - Designing out crime
- 3.15 - Conservation of the Historic Environment
- 3.18 – Setting of Listed Buildings, Conservation Areas and World Heritage Sites
- 3.19 – Archaeology
- 3.20 – Tall Buildings
- 3.22 – Important Local Views
- 3.28 - Biodiversity
- 4.2 - Quality of residential accommodation
- 4.3 - Mix of dwellings
- 4.4 - Affordable housing
- 4.5 - Wheelchair affordable housing
- 5.2 - Transport impacts
- 5.3 - Walking and cycling
- 5.6 - Car parking
- 5.7 - Parking standards for disabled people and the mobility impaired

155. Supplementary Planning Documents

Sustainable Design and construction SPD (2009)
 Sustainability Assessments SPD (2009)
 Sustainable Transport SPD (2010)
 Affordable Housing SPD (2008 - Adopted and 2011 - Draft)
 Residential Design Standards SPD (2011 and 2015)
 Section 106 Planning Obligations and Community Infrastructure Levy (2015)
 Development Viability SPD (2016)
 Design and Access Statements SPD (2007)

156. Greater London Authority Supplementary Guidance

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

Emerging Policy

Draft New London Plan

157. The draft New London Plan was published on 30 November 2017 and the first and only

stage of consultation closed on 2nd March 2018. The document is expected to reach examination stage later this year however, given the stage of preparation it can only be attributed limited weight. The draft New London Plan identified the Old Kent Road as having a minimum capacity for housing of 12,000 and a jobs target of 5,000.

Old Kent Road Area Action Plan (OKR AAP)

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

New Southwark Plan

160. For the last 5 years the council has been preparing the New Southwark Plan (NSP) which will replace the saved policies of the 2007 Southwark Plan and the 2011 Core Strategy. The council concluded consultation on the Proposed Submission version (Regulation 19) on 27 February 2018. It is anticipated that the plan will be adopted in 2019 following an Examination in Public (EIP). Similarly with the OKR AAP, as the NSP is not yet adopted policy, it can only be attributed limited weight.
161. Some of the objections to the proposed development have argued that this application should be refused because it is premature and would prejudice the emerging OKR AAP. Legal Advice received in relation to this issue highlights the following from the National Planning Policy Guidance “arguments that an application is premature are unlikely to justify a refusal of planning permission other than where it is clear that the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, taking the policies in the Framework and any other material considerations into account. Such circumstances are likely, but not exclusively, to be limited to situations where both:
- (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.
162. Refusal of planning permission on grounds of prematurity will 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.”

Environmental Impact Assessment

163. The proposed development constitutes an urban development project within the meaning of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The EIA Regulations preclude the granting of planning permission unless the Council has first taken the 'environmental information' into consideration. The 'environmental information' means an Environmental Statement, including any further information, any representations made by consultation bodies and any other person, about the environmental effects of the development. In accordance with the EIA Regulations, an Environmental Statement (ES) comprising a Non-Technical Summary, Environmental Statement and Technical Appendices has been submitted.
164. Prior to the submission of the application the applicant requested a formal 'Scoping Opinion' under Regulation 13 of the EIA Regulations, to ascertain what information the Local Planning Authority considered should be included within the Environmental Statement (ES) (application reference 18/AP/0111).
165. The submitted ES and ES addendum comprise a Main Report, Technical Appendices, and a Non-Technical Summary. It details the results of the EIA and provides a detailed verification of the potential beneficial and adverse environmental impacts in relation to the proposed development, including the following areas of impact (in the order that they appear in the ES):
- Socio-Economics Effects;
 - Population and Human Health;
 - Air Quality;
 - Noise and Vibration;
 - Transport and Access;
 - Ground Conditions and Soils;
 - Hydrology and Flood Risk;
 - Cultural Heritage;
 - Archaeology;
 - Townscape and Visual Impacts;
 - Daylight and Sunlight Effects;
 - Wind and Microclimate;
 - Aviation;
 - Electrical Interference;
 - Climate Change, Major Accidents and Material Assets; and
 - Cumulative Effects
166. In assessing the likely environmental effects of a scheme, the ES identifies the existing (baseline) environmental conditions prevailing at the site, and the likely environmental impacts (including magnitude, duration, and significance) taking account of potential sensitive receptors. It further identifies measures to mitigate any adverse impacts, and a summary of potential positive and negative residual effects remaining after mitigation measures is included.
167. Additional environmental information or 'Further Information' was received during the course of the application and in accordance with Regulation 22 of the EIA Regulations all statutory consultees and neighbours were been re-consulted in writing. The assessment of the ES and Further Information and the conclusions reached regarding the environmental effects of the proposed development as well as mitigation measures (where required), are set out in the relevant section of this report, although cumulative impacts are considered below.

Alternatives

168. In relation to alternatives, the ES considers alternative designs and uses for the site, each of which would have presented different challenges. The ES confirms that the applicant considered financial viability, quality of design, market requirements, land ownership, planning policy and environmental effects of the following alternatives:
- Two architectural companies were invited to explore options for the application site. A variety of massing options were explored and each included a proposed mixed use scheme with a number of tall buildings located along the site perimeter.
 - Farrells were then invited to explore options and were later appointed by the client to design the final Proposed Development. A number of massing options were explored, and the details of these are set out in the submitted Design and Access Statement. The reasons why the submitted option was chosen include:
 - The alignment of the buildings proposed along the site's perimeter offers a bigger public realm in middle of the Proposed Development;
 - The design offers improved connectivity and circulation through the site
 - There is more variety and hierarchy offered in the buildings' height and therefore provides a unique identity and better definition for each building
 - Overlooking issues are better resolved due to the articulation of the towers.
169. The ES Addendum also considers a 'do nothing' scenario and concludes that, had the adopted London Plan (2016), not identified the application site as part of an Opportunity Area, the redevelopment of site would have been less likely. However, as the site has been identified as an Opportunity Area, it is more than likely that another developer would propose to develop the site to a similar capacity.
170. Alternative sites are not considered, but given the location of the application site in the Old Kent Road Opportunity Area, as identified by the London Plan (2016), this is considered an acceptable approach.

Cumulative Impacts

171. Each chapter in the ES assesses the cumulative effects of the proposed development and other surrounding proposals. This is summarised in Chapter 22 of the ES Addendum, and discussed in more detail where relevant in this report. In summary, the ES concludes that the proposed Ruby Triangle development and the other identified committed developments would cumulatively attract more than 22,000 people to the area and help to implement the aims of the draft OKR AAP with the facilities and amenities required to support a sustainable community. It identifies that, cumulatively, the Ruby Triangle development and other committed developments would provide 3,500 new homes, with associated infrastructure and a substantial number of new jobs and new community facilities (for example the sports hall at Ruby Triangle). It is also anticipated that these developments would be beneficial to the local community's long-term health with developments being car-free, providing cycling facilities, public open space, green links and amenity areas. The area's local biodiversity would also be improved with new local planting which would attract local wildlife. Finally, the ES also identifies that the Ruby Triangle development and other committed developments would have a positive effect on the townscape with high quality design providing focal points into an area which has traditionally comprised warehousing and other industrial and retail buildings with little townscape merit.
172. The ES does however, also acknowledge that there would be some adverse impacts caused by the cumulative developments. During construction this would mainly

comprise traffic impacts, noise, air quality, townscape and visual impacts (due to demolition, site clearance and emerging building structures). However, these impacts would be intermittent and temporary in duration. Many would be mitigated through the implementation of a robust Construction Management Plan. It is also unlikely that all of the cumulative developments identified would be constructed at the same time. During operation there may be some light pollution, and a reduction in daylight and sunlight in amenity areas and in some existing properties. However, these impacts would also be mitigated as far as possible.

Conclusions of the EIA and ES

173. The ES concludes that, in most cases, the proposed development would provide beneficial impacts to residents, businesses and the general public. It does however acknowledge that some receptors would experience adverse impacts and that most of these would occur during construction. As such, they would be temporary and mitigation measures have been identified which would help to reduce them significantly.

Principle of Development and Proposed Land Uses

174. The application site is partially located in a Strategic Industrial Location (SIL), as identified in the Core Strategy and illustrated in figure 1 of this report. The proposed development would increase the overall non residential floor space on the site from 10,407.6 sqm (GIA) (existing) to 10,849 sqm (GIA), but would result in a net loss of B class floor space. Of the existing non residential floor space on the site, 8,316.95sqm is currently in B class use (B1, B2 or B8), or could potentially be in B Class use if it weren't vacant. As 5,328 sqm of new B1 floor space is proposed, this would result in a net loss of 2,988.95 sqm across the whole site. As 7374.95 sqm of the existing B class use is in the SIL, this equates to a net loss of 2046.95 sqm in the SIL. This does not include the existing Enterprise car hire business that currently operates from the site (although outside SIL), as this is classed as sui generis. This business will be re-provided in the proposed development.
175. 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 developments that will be permitted in SIL are B class uses and other sui generis uses which are inappropriate in residential areas. The proposals under consideration here are therefore contrary to both Strategic Policy 10 of the Core Strategy and Saved Policy 1.2 of the Southwark Plan as they would result in the loss of B class floor space and would introduce residential and other mixed uses into the SIL.
176. However, the Core Strategy also sets out the future vision for the Old Kent Road as a growth and regeneration action area, subject to a future area action plan (AAP). The Old Kent Road was also designated as an Opportunity Area in the London Plan in 2015. As mentioned above, Opportunity Areas are described in the adopted 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.
177. Policy 2.13 in the adopted London Plan sets out the strategic policy for the development and intensification of opportunity areas. Annex 1 includes an indicative capacity for Old Kent Road for 2,500 homes and 1,000 jobs and supports the development of a planning framework to realise the area's full growth potential. Annex 1 also provides for residential-led development and a review of the Strategic Industrial Location designation and capacity to accommodate a phased rationalisation of its functions in the Opportunity Area or elsewhere.

178. Policy 2.17 (Strategic Industrial Locations (SILs)) in the adopted London Plan 2016 states that development proposals in SILs should be refused unless they are part of a strategically co-ordinated process of SIL consolidation through an opportunity area framework or borough development plan document. The policy requires boroughs to identify SILs on proposals maps and develop local policies in relation to protecting their function. Policy 4.4. (Managing Industrial Land and Premises) requires industrial sites to be planned and managed in local circumstances in line with this strategic policy, taking account of borough level groupings for the transfer of industrial land to other uses (part c). Map 4.1 shows Southwark as a limited transfer borough with exceptional planned release. This is reflective of the designation of the Old Kent Road opportunity area, which contains the majority of Southwark's SIL.
179. Part B of adopted London Plan Policy 2.13 states that planning decisions should be made for development proposals that support the strategic policy directions for the opportunity areas set out in Annex 1, and where relevant, in adopted opportunity area planning frameworks (part a). The policy requires planning authorities to seek to optimise residential and non-residential output and densities, providing infrastructure to sustain growth, and where appropriate, contain a mix of uses (part b). The policy also requires meeting or, where appropriate, exceeding the minimum guidelines for housing and employment capacity as set out in Annex 1, tested through OAPFs (part c), realising the scope for intensification associated with significant transport improvements (part d) and supporting wider regeneration.
180. Emerging policy is developing at the regional and local scale to realise the ambitions of the Old Kent Road Opportunity Area set by adopted policy. The draft new London Plan recognises much greater capacity for development within the Old Kent Road accompanied by a commitment to major new transport improvements with the extension of the Bakerloo Line. The draft New London Plan increases the minimum target for new homes in the Old Kent Road Opportunity Area from 2,500 in the adopted 2016 London Plan to 12,000 and the jobs target from 1,000 to 5,000. The draft New London Plan also sets out ways in which industrial land can be managed, including how uses can be mixed within some industrial designations. The emerging AAP for the Old Kent Road contains proposals for an innovative mix of industrial and residential uses in a detailed masterplanning approach across the opportunity area, including phased rationalisation of and proposed new sites for SIL. Whilst the draft new London Plan and OKR AAP currently have limited or very limited weight in planning decisions, it is important to note the future strategic direction envisaged for the Old Kent Road in the adopted London Plan as further policy is being developed in line with LBS and the Mayor's aspirations for the designated opportunity area.
181. So, whilst the application site contains designated SIL, the adopted London Plan clearly identifies the Old Kent Road as an Opportunity Area which will undergo significant transformation, including a SIL review and residential led development. Furthermore, the GLA and LBS have now agreed an approach to phasing the release of protected industrial land for mixed use development in the Old Kent Road Opportunity Area. The application site is agreed to be in the first phase of released sites. Members should however note that even with this agreement in place the draft OKR AAP and New Southwark Plan (NSP) would still need to be subject to an EiP and approval of the Secretary of State before they become the adopted development plan position. It should also be noted that there have been a number of objections to the proposed release of industrial land from third parties which would need to be considered at the EiP.
182. In their Stage 1 report however, the GLA state that the inclusion of residential units on this protected industrial site is not currently supported, in line with London Plan Policies 2.17 and 4.4 and draft London Plan Policy E6. They consider that the balance of uses proposed does not accord with London Plan Policy 4.4 and Policy E7 of the draft London Plan. Should the site be considered suitable for mixed-use development, they would

require applicant to increase industrial floorspace to address the requirements of draft London Plan Policy E7 and the draft Old Kent Road Area Action Plan.

183. In response to these comments, the proposed development has been revised to substantially increase the industrial floor space proposed and to provide much clearer land use designations. Through informal discussion, the GLA have indicated that this addresses their concerns. As submitted, the scheme originally proposed approximately 5,200 sqm (GIA) of commercial floorspace within a wide range of land use classifications. The maximum possible B1 floor space that could have been delivered was 4,007 sqm (GIA), but it was very unlikely that this would all have been delivered as B class floor space given the flexibility of uses applied for, ranging from A1 to D1. In addition, the original application did not specify that any of the floor space would be B1(c) (light industry appropriate in a residential area). The revised scheme that is now under consideration clearly proposes 5,328 sqm of floor space that can only be delivered for B1 class uses. Whilst a range from B1 (a) to (c) has been applied for, the applicant has confirmed that all of this space would be would be designed to B1 (c) specifications. This includes:

- The average floor to floor height would be 5m;
- The floors would be designed to take light industrial loadings (current floor load allowance is 5.0kN/m² plus 1.0kN/m² for lightweight partitions. This is in excess of the EuroCode requirements of 2.5 kN/m²);
- Soffits would have a capacity of 0.75 kN/m² for the services;
- There would be private goods lifts to serve upper units;
- Screed would be finished with oil resistant and slip resistant epoxy paints;
- Sound insulation would be provided if required;
- The separating slab between commercial and residential above would be sized and constructed to provide sound attenuation (noise transfer between commercial and residential uses would also be controlled by a planning condition);
- Units would be open plan for flexibility of use;
- Metered hot water would be supplied from the site wide energy centre if required;
- There would be an extract system for noxious output; and
- They would be fitted out with Mechanical and Engineering services;
- Individually metered water, electricity, telecoms/data and hot water would be supplied as required.

184. The applicant has also confirmed that priority would be given to existing Southwark businesses who want occupy this space. Five and ten year leases would be available with five yearly rent reviews.

185. In light of the adopted policy position, when determining the acceptability of the proposed development in land use terms, Members are advised to consider whether the wider regeneration benefits of the scheme would outweigh any harm caused by the loss of B class floor space and the introduction of residential, retail and community uses, and whether those benefits therefore justify a departure from the adopted planning policy. Officers consider that the key benefits arising from the proposal would outweigh the harm that would be caused by this departure from adopted policy. Those wider benefits are set out in detail in the following paragraphs of this report.

Business Relocation and Retention

186. Officers have worked with the applicants and some of the existing businesses on the site to understand whether they can be re-provided for within the development, or relocated to another site. Table 10 below summarises these discussions.

Business	Gross Internal Area (GIA) Sqm	Number of employees	Use Class	Relocation or re-provision options explored?
Southwark Metals Limited	1327	15	B8	London Plan (2016) Policy 5.17 requires the capacity of the Southwark Metals waste operation to be re-provided. Approval has recently been given for LBS to purchase land near the application site on which it would be possible to reallocate this capacity.
Diamond Scaffolding	167.2	7	B8	The applicant advises that they have already left the site.
The Trustees of World Harvest Christian Centre	1,170.4	-	D1	This church has been offered a new space within proposed development. The applicant confirms that they have already left the site, but intend to return. The Section 106 agreement will include a clause that gives the church first right of refusal to the new space proposed.
Enterprise Rent A Car UK Ltd.	77	5	B1 (a)	This existing business is to be re-provided within the proposed redevelopment according to a phased re-provision.
Constantine Ltd	655.5	10	B1	Negotiations ongoing. Please see paragraph 187 below for more detail. It should be noted that Constantine has not agreed to any of the relocation options offered.

Table 10 Existing businesses and organisations that are to be relocated

187. Constantine Ltd. has objected to the proposed development, citing amongst other reasons, concerns about the loss of their leasehold property on the site. Facilitated by Officers, the applicant has met with Constantine Ltd. during the course of the application and offered a number of 'in principle' options that would accommodate them should they decide to stay in the locality in the long term or move to an alternative location, but not in the immediate future. The applicant has also updated the proposed construction programme to take account of the length of Constantine Ltd.'s lease and they have agreed to meet them on a regular basis (suggested quarterly) for updates on development progress.
188. In addition, a final Construction Environment Management Plan would be secured by the Section 106 Legal Agreement in order to ensure that existing businesses and residents are not harmed by the construction process.

Regeneration of an Ageing Industrial Area

189. A borough-wide industrial and warehousing study was carried out by GVA in 2014 on behalf of LBS. The study was commissioned and mostly completed before the Old Kent Road was designated as an Opportunity Area. Across Southwark, it identified that the

majority of the industrial and warehousing supply is within purpose built, older premises which is of increasingly poor quality. The application site was assessed specifically within a wider cluster around the Sandgate Trading Estate. This cluster was shown to have a mixed level of adequacy, with stock closer to the Old Kent Road demonstrating inefficient use of space and lower quality units. It was considered that this area would benefit from investment and intensification.

190. In its conclusion, the GVA study identified the need for the borough to balance the protection and enhancement of industrial sites with the delivery of other aspirations and requirements, including increasing housing provision. It also identified that the two needn't be mutually exclusive and that changes in occupier types increasingly lend themselves to improved integration within a wider mix of uses. Based on the mixed and ageing condition of the existing units on the site, it is considered that the delivery of new workspace, all designed to modern B1 (c) specifications is a positive aspect of the proposed development.

Job Creation

191. The submission advises that there are currently 132 employees working on the site. Based on HCA Employment Density Guidelines (2015), the proposed development would create 298 full time jobs (once constructed). This is a net gain of approximately 166 jobs which is a significant positive aspect of the scheme.
192. As advised by LBS's Local Economy Team (LET), a financial contribution of £10,590 is required to mitigate the loss of B class floor space. This would be invested in 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 Section 106 Agreement.
193. The LET have also set out further requirements in order to ensure that this development delivers employment and training for local people. All will be secured through the Section 106 agreement. During the construction phase, the proposed development would be expected to deliver: 261 sustained jobs to unemployed Southwark residents; deliver 261 short courses; and take on 65 construction industry apprentices. Once the development is constructed, it would be expected to provide 52 sustained jobs for unemployed Southwark residents. If any of these expectations were not to be achieved, a financial contribution would be sought in accordance with the Council's Planning Obligations and CIL SPD. An Employment, Skills and Business Support Plan (construction phase) and a Skills and Employment Plan (operational phase) would also be secured through the Section 106 Agreement.
194. In addition to the increase in the number of jobs proposed, during the course of the application the applicant has also agreed to enter into a Unilateral Undertaking to ensure employees in the proposed development are paid the London Living Wage.

The Specific Nature of the Workspace Proposed

195. A range of flexible workspaces are proposed that could accommodate a range of different unit sizes and shared workspaces, but as set out above, all would be specified to meet the requirements of B1 (c) uses. A clause in the Section 106 Agreement would ensure Practical Completion of the commercial spaces under each block on or before the Practical Completion of the residential units above.

Affordable Workspace

196. The proposed development would deliver 541 sqm GIA of affordable workspace on site, comprising of 11 approximately 40 sqm units, with typical floor to ceiling heights of

between 3.5 and 7m. This equates to approximately 10.15% of the total proposed B1 floor space (5,328 sqm GIA). This would be secured through the Section 106 Agreement. This is considered a very positive aspect of the scheme.

197. The basic terms would be as follows:

- Weekly rental set at between £150-200 per week including service charges (subject to annual RPI increase). This equates to approximately £18 to £24 per sq ft per year;
- Flexible Leases up to 5 years;
- The units will only be available for a single premises business;
- Applicants must either have an existing business in LB Southwark or be a resident of LB Southwark;
- During the construction period, a database of interested parties will be compiled and maintained;
- On completion, the units will be marketed using a website, newspapers, agencies, managing agent, database, and external signage;
- Units would be actively marketed for nine months to Old Kent Road businesses, then for nine months to other Southwark businesses. Only if the units remain unoccupied after this period of marketing will the units be made available to the open market and rented to any interested party for up to five years. After those five years, the process would start again. During this time the existing tenant can remain until an "Affordable Category" tenant is found;
- The day to day management of the units would be carried out by a suitably competent management company;
- Each unit would have an accessible WC and kitchenette. and
- The units would remain as affordable units for a period of 30 years.

198. As with the other proposed work space, all of the affordable units would be built to B1 (c) specifications, but may be used for B1 a, b or c uses.

199. In addition, the proposed development would also deliver a Business Incubator space of 481 sqm at ground and first floor levels in Block B. It would aim to support and develop up to 24 start-up businesses per year, and consist of six individual offices, communal co-working space and a café. It would be managed locally, and start ups would be provided with guidance, resources and investment. There would also be an associated incubator programme that would provide networking platforms, mentorship and expertise across a wide range of industries. The communal workspace would provide hot desks, meeting spaces and other services for hire. Reduced prices would be offered to residents of Southwark.

Provision of Housing, Including Affordable Housing

200. The scheme would provide 1,152 new residential units, including an affordable housing offer that is in excess of policy requirements. There is a pressing need for housing in the borough. The adopted London Plan (2016) requires the provision of a range of housing and sets the borough a target of 27,362 new homes between 2015 and 2025. Strategic Policy 5 of the Core Strategy requires development to meet the housing needs of people who want to live in Southwark and London by providing high quality new homes in attractive areas, particularly growth areas. This is echoed by emerging policy in the draft new London Plan, NSP and OKR AAP. The proposal would make a sizeable contribution to the borough's housing stock and combined with a generous affordable housing offer, this is considered to represent a significant positive aspect of the scheme.

Provision of New Sports Hall and Gym Facility

201. The proposed development would include a new four court public sports hall and gym,

which would be offered to LBS for a peppercorn rent. This would meet a need identified in the draft Facilities Planning Model report prepared by Sport England in March 2016. Whilst this report identified that the number of sports halls in Southwark is above the London average, it concluded that there is evidence of currently unmet demand which will be exacerbated by growth. The areas in which unmet demand is greatest are Camberwell and Bermondsey. The new sports hall and gym facility proposed here, alongside proposals for new leisure facilities at Canada Water, would contribute towards meeting existing and future demand. As such, this is considered a significant positive aspect of the scheme of benefit to the existing and new communities. This would be secured through the Section 106 Agreement.

202. Officers from the Parks and Leisure Team have met with Officers from the Old Kent Road Regeneration team on a number of occasions in relation to the proposed development. They have provided the following response to the proposals:

“The proposed scheme of sports hall and gym will provide another venue from which the council can deliver the free gym element of its free gym and swim scheme. The sports hall is a welcome addition as there is a shortage of publically accessible sports halls in the borough in which the population is set to increase. In addition to this, the sports hall will be able to assist in the delivery of sports activities for neighbouring schools which will not have on site sports facilities.

Officers have had positive discussions in relation to the future management of the facility, draft business plans and draft programming of activities. Leisure Officers have had positive meetings with the developers to explore further details on the proposed scheme.”

203. The detailed design of the internal layout of the sports hall and gym would be required by condition, to be agreed with the Council’s Parks and Leisure team. Details relating to the offer will also be secured through the Section 106 Agreement, all of which would also be subject to agreement by Parks and Leisure. This would include securing the fit out of the facility to LBS specifications (including heating, cooling and ventilation) and securing a long lease and peppercorn rent. The sports hall would conform to Sports England standards and BB103 for school design.

Provision of a New Park

204. The proposed development would deliver high quality public realm of 4,301 sqm, including a new park of 3,792 sqm. This has the potential to be enlarged in the future through the delivery of further open space in the neighbouring site (currently occupied by Carpet Right / Office Outlet). Planning permission for the redevelopment of that site would not be granted if it did not include a suitable open space, as identified in the draft OKR AAP.
205. The proposal would increase park and open space provision in line with the strategic objectives of LBS’s Open Space Strategy (2013). The Strategy identifies the ‘Bermondsey and Old Kent Road sub-area’ as having the lowest level of local park provision in the Borough with a total of 0.17ha of park provision per 1,000 population. This local park provision is expected to fall to just 0.13ha per 1,000 population in 2026 as a result of population growth. The existing deficiency results from large areas of extensive commercial activity within the area that does not provide parks or open spaces. The provision of this new park is therefore considered a significant positive aspect of the scheme, which would be of benefit to the existing and new communities.

Re-provision of Church Space

206. As identified above, some of the existing former industrial floor space on the application

has been converted for use as places of worship. The proposed development includes 425 sqm (GIA) D1 space intended for the re-provision of the Trustees of World Harvest Christian Centre church. This is considered a positive aspect of the scheme of particular benefit to the existing community.

Re-instatement of Retail Frontage to the Old Kent Road

207. Although it is outside the SIL, and therefore not a departure from the adopted plan, it is worth noting that the proposal to introduce retail uses along the Old Kent Road is also considered a positive benefit of the proposed development. Not only would this contribute positively to the character of the area by re-instating the 'High Street' character of the Old Kent Road and creating an active frontage, it would also contribute to the employment opportunities identified above.

Town Centre Uses

208. The NPPF (2018) defines Main Town Centre Uses as: "Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)."
209. In order to provide a mixed use place, the proposals under consideration would incorporate a mix of residential, commercial and community uses. The non-residential uses would be concentrated on the lower floors of the proposed buildings, where they would contribute to the creation of a vibrant, well animated street scene. The breakdown of non residential land uses proposed is set out in Table 5 of this report, but to summarise it consists of 10,849 sqm of non residential floor space, including 1,773 sqm leisure uses (sports hall and gym facility), 1,391 A class retail uses and 5,328 B1 class business uses. Whilst, as discussed above the B class space would all be designed to B1 (c) (light industrial) specification, planning permission for a flexible range of B1 class uses, including B1 (a) (offices) is sought. The proposed sports hall and gym facility would be a community use rather than a Main Town Centre leisure use. It would be operated by the Council, would meet an identified local need and is likely to serve local schools. Furthermore, the majority of the floor space proposed would be delivered as a four court sports hall, rather than health and fitness centre uses. As such, a maximum potential 6,719 sqm town centre uses is proposed.
210. The revised NPPF (2018) identifies that local planning authorities should be promoting competitive town centres. In paragraph 86, the NPPF advises that "Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan". Paragraph 89 of the NPPF states that local authorities should require a retail and leisure impact assessment if the proposed development is not in accordance with an up-to-date plan and where the quantum of retail and leisure uses proposed would be over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500 sqm). Paragraph 90 goes on to state that where an application fails to satisfy the sequential test or is likely to have a significant adverse impact, it should be refused. The London Plan (2016) is consistent with the policy guidance of the NPPF.
211. Strategic Policy 3 of the Southwark Core Strategy relates specifically to shopping, leisure and entertainment and aims to maintain Southwark's network of successful designated town centres. As part of this, the policy identifies a hierarchy of town and local centres, reflecting their size and role in the borough. In the adopted Core Strategy, the Old Kent Road is not identified as one of these designated town centres, despite the

significant retail offer that it provides. The Policy then goes on to identify the tests set out in national planning policy and the London Plan for new shopping and leisure space which are proposed outside designated town and local centres.

212. Southwark Plan Saved Policy 1.7 relates to development within town centres, and states that most new development for town centre uses should be accommodated within existing town centres and local centres. Policy 1.8 (Location of retail outside town centres) was not found to be in conformity with the NPPF and was accordingly not saved when the plan was revised in 2013.
213. The Southwark Retail Study was published in 2015 to provide a robust and credible evidence base to inform the Council's work on the New Southwark Plan. This identified that Old Kent Road is the dominant destination for comparison shopping in the borough, and that as it is not currently a designated town centre it is vulnerable. It identifies that the area has been designated as an Opportunity Area and that there is a potential for a new town and/or local centres.
214. Acknowledging its limited weight, it is worth noting that emerging Policy P30, Town and Local Centres, of the draft NSP proposes the Old Kent Road as a new Major Town Centre. It also states that town centre uses will be permitted in town centres where:
- The scale and nature is appropriate to the role and catchment of the centre; and
 - A Use Classes are retained or replaced by an alternative use that provides a service to the general public, and would not harm the vitality and viability of the centre; and
 - The development would not harm the amenity of surrounding occupiers or result in a concentration of uses that harms the character of the area; and
 - The development provides an active use at ground floor in locations with high footfall; and
 - Large schemes for town centre uses that are 1,000 sqm or more provide public toilets, public drinking fountains and public seating.
215. In terms of the allocation sites identified in the draft NSP, the application site is contained within the boundary of NSP 67: Sandgate Street and Verney Road within the Draft Old Kent Road Area Vision. The NSP states that development here should provide a new part of the town centre and identifies that the site is appropriate for new homes (Class C3) retail (A1, A2, A3 and A4) on the Old Kent Road frontage, employment (Class B) and community (Class D) uses. It also supports the provision of new public open space and states that comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.
216. Again, acknowledging its very limited weight, draft OKR AAP, Emerging Policy AAP7, Town Centres, Leisure and Entertainment, identifies the area as a major town centre and identifies the uses that would be appropriate, including retail, community, leisure, cultural and offices above shops. Emerging policy AAP6, Business and Workspace – The Bow Tie, requires an innovative mix of uses including light industrial, offices, manufacturing, distribution and creative workspaces. With specific reference to the site itself, which sits within OKR 13, the application site is identified as appropriate for new and re-provided homes, employment, retail and community uses (including specific reference to a new sports hall).
217. It is clear therefore that emerging policy and the existing evidence base for the Old Kent Opportunity Road area support mixed use development and the designation of the Old Kent Road as a high street and Major Town Centre. Nonetheless, and in recognition of the limited weight of this emerging policy, the applicant has carried out a sequential test and retail impact assessment of the proposed development.

218. The Sequential test concludes that there are no sites within the closest defined centre at The Blue (1.25km to the north of the application site) which are available and suitable to accommodate a proposal of the nature under consideration here (mixed use development with significant open space offer). Furthermore, it is concluded that locating the proposed uses at The Blue, or any other currently defined centre, would not meet the locational requirements the emerging policies for the site which specifically seek to define the Old Kent Road as a Major Town Centre. Therefore, the proposals are considered to comply with the sequential approach to development as required in the Core Strategy and the NPPF.
219. During the course of the application, and in response to concerns raised by LBS and the GLA about the lack of B class floor space, the amount of retail floor space proposed has reduced significantly. Initially, up to 4,500 sqm was proposed for all A1-A5 uses (with a maximum of 3,575sqm for A1 retail). Following revisions, only 991 sqm for all A1 to A4 uses is now proposed. The proposed sports hall and gym facility would be a community use rather than a main town centre leisure use (health and fitness centres are identified in the NPPF as main town centre uses, but sports halls are not). It would be operated by the Council, would meet an identified local need and is likely to serve local schools. Furthermore, the majority of the floor space proposed would be delivered as a four court sports hall, rather than health and fitness centre uses. As such, it is considered that the proposal no longer exceeds the NPPF threshold of 2,500sqm over which a retail and leisure use impact assessment would be required. Officers are satisfied that the additional population anticipated in the Opportunity Area would generate demand for retail uses and that this relatively small retail offer would not detract from other designated centres.

Conclusion on Land Use

220. To conclude in relation to land uses and the principle of development, the proposed development would be contrary to Strategic Policy 10 of the Core Strategy and Saved Policy 1.2 of the Southwark Plan owing to the loss of B class floorspace and the introduction of retail, residential and D class floorspace into SIL. This must therefore be weighed against the major regeneration benefits of the scheme, including job creation, the provision of good quality, flexible commercial space including affordable workspace and a tech incubator space, a sizeable contribution to the borough's housing stock, including affordable housing, and the provision of new open space and a new public sports hall and gym. Job creation and new housing would be in accordance with the London Plan (2016) requirements for the Old Kent Road Opportunity Area. For these reasons, officers consider that the principle of the proposed development in land use terms should be supported in this instance. In relation to town centre uses, it is considered that whilst the proposed development would introduce Main Town Centre Uses outside a currently designated town centre, the proposals would comply with the tests set out in the NPPF and emerging policy and that this would not be to the detriment of other designated centres.

Density

221. London Plan (2016) Policy 3.4, Optimising Housing Potential, states that development should optimise housing output for different types of location within the relevant density range. It also requires local context, design principles and public transport capacity to be taken into account. Strategic Policy 5, 'Providing New Homes' of the Southwark Core Strategy sets out the density ranges that residential and mixed use developments are expected to meet. As the application site is located within the Urban Zone, a density range of 200 to 700 habitable rooms per hectare would be sought here. This policy also clearly states however, that within opportunity areas and action area cores, the maximum densities may be exceeded when developments are of an exemplary

standard of design. Criteria for exceptional design are set out in section 2.2 of the Residential Design Standards SPD (2015).

222. The density of the proposed development would be approximately 2,713 habitable rooms per hectare (hrrh). This is clearly significantly higher than the upper limit set by Strategic Policy 5 for the Urban Density Zone, so it is necessary to assess it against the exception made for Opportunity Areas. There is a pressing need to optimise the use of land in London, particularly in Opportunity Areas. The proposal would result in a good standard of accommodation, with many of the 'exemplary' requirements of the Southwark Residential Design Standards SPD met. This is summarised in the table below. Officers have worked with the architect and design team during the course of this application to secure revisions to the layout to ensure that the proposed development is of the highest residential design standards possible. Further detail on residential quality is provided in paragraphs 239 - 263 of this report.

Exemplary residential design criteria from Southwark Residential Design Standards SPD	Commentary
Provide for bulk storage	Each of the apartments proposed would have storage, broadly in compliance with the Residential Design Standards SPD. In addition to this, 161 sqm bulk storage is proposed across the blocks, mostly in the basements and at mezzanine levels. This is distributed across each of the proposed buildings as follows: <ul style="list-style-type: none"> • A – 42sqm • B1 – 28sqm • B2 – 32sqm • C1 – 32sqm • C2 – 27sqm
Exceed minimum privacy distances	Minimum privacy distances would be exceeded.
Good sunlight and daylight standards	Good sunlight and daylight standards would be achieved.
Exceed minimum ceiling heights of 2.3m	All residential ceiling heights would exceed 2.3m. All living / bedrooms would have floor to ceiling heights of 2.55m and all kitchens / bathrooms / hallways would have 2.35m.
Exceed amenity space standards (both private and communal)	The amenity space proposed is set out in detail in paragraphs 251 - 257 below. Whilst there would be a small shortfall, this would be compensated by a financial contribution in line with the requirements of Southwark's Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD (2015).
Secure by Design certification	The scheme should achieve Secure by Design accreditation. Conditions to require this are recommended.
No more than 5% studio flats	Only 0.7% of the units proposed would be studio flats.
Maximise the potential of the site	The potential of the site would be

	maximised, providing mixed use development, a new park, and a new public sports hall and gym facility.
Include a minimum 10% of units that are suitable for wheelchair users	Over 10% of the proposed units would be suitable for wheelchair users.
Have excellent accessibility within buildings	The accessibility within the buildings would be excellent.
Have exceptional environmental performance	The environmental performance would be fully policy compliant, taking into account a contribution to the Southwark Green Fund. The potential to connect to SELCHP is designed in.
Minimise noise nuisance between flats by stacking floors so that bedrooms are above bedrooms, lounges above lounges	Officers have met with the design team on a number of occasions to go through the residential layouts and ensure that this is the case wherever possible. In addition, it is confirmed that the proposed development would be designed to provide a higher level of sound insulation than the minimum requirements of Approved Document E: 2003 (amended 2004, 2010, 2013 and 2015) of the Building Regulations (ADE). In areas where plant rooms are adjacent to residential areas, the plant shall be selected and provided with appropriate mitigation to ensure acceptable noise levels.
Make a positive contribution to local context, character and communities	The proposed development would make a positive contribution to local context, character and communities in terms of its quality of design and regeneration benefits including affordable housing, workspace, including affordable workspace, a new park and a new public sports hall and gym facility.
Include a predominance of dual aspect units	Approximately 50% of the proposed units would be dual or corner aspect. This relatively high proportion of single aspect units is mitigated by a number of design details, as set out in paragraphs 242 - 243 below.
Have natural light and ventilation in all kitchens and bathrooms	This would not be the achieved.
At least 60% of units contain two or more bedrooms	54.5% of the total number of units across all tenures would have two or more bedrooms. Of the affordable housing, 57.2% would have two or more bedrooms. Refer to paragraphs 233 - 236 for more detail.
Significantly exceed the minimum floor space standards	All units would meet the space standards, and many would exceed them, some to a significant degree.
Minimise corridor lengths by having additional cores	This is discussed in further detail in paragraphs 245 - 247 below.

Table 11 Exemplary residential design criteria from the Southwark Residential Design Standards SPD

223. In addition, Officers have identified the following exceptional aspects of the residential design:

- Exceptional architectural design, with high quality materials proposed;
- Recessed and partially recessed balconies. No 'bolt on' balconies;
- Tenure blind design;
- Choice of layouts, with some open plan and others with separate kitchen diners and living rooms;
- Family homes proposed on lower floors to improve access to external amenity;
- Wherever possible all new dwellings have an entrance lobby or hall and access to bedrooms from circulation space rather than another room; and
- Dwellings with three or more bedrooms have a second WC with a hand wash basin.

224. Whilst the proposed buildings would be very tall, they would be set within a generous landscaped area, and officers consider that the impact upon neighbouring occupiers would be acceptable. As such, the higher density proposed would not compromise the quality of accommodation and the impacts of the development would be acceptable. It is therefore considered that the exceedance of the density threshold would not warrant withholding permission.

Affordable Housing

225. Strategic Policy 6 of the Core Strategy, 'Homes for People on Different Incomes', requires at least 35% of the residential units to be affordable. For developments of 15 or more units affordable housing is calculated as a percentage of the habitable rooms and further information on this can be found in the Council's draft Affordable Housing SPD (2011). All of the affordable units should be provided on site and a mix of housing types and sizes is required.

226. The proposed development would provide 40.5% affordable housing in total (calculated by habitable room). A policy compliant 35% of this would be split 71.5% social rented and 28.5% intermediate (again, calculated by habitable rooms). An "additional" 5.4% would be intermediate. This equates to 25.1% of the total habitable rooms being provided within social rent homes and 15.4% of all habitable rooms being provided in intermediate homes. This generous affordable housing offer, which is in excess of that required by planning policy, is welcomed and considered a significant benefit of the proposed development. The tenure split proposed is set out in more detail in the Tables 3, 4 and 12 of this report.

Tenure	Habitable Rooms*		Units*	
Social	928	25.1%	277	24%
Intermediate	370	10%	111	9.6%
"Additional" Intermediate	198	5.4%	63	5.5%
Private	2,194	59.5%	701	60.9%
Total	3,690		1,152	

Table 12 Proposed tenure

227. Southwark Plan Saved Policy 4.4 sets a requirement for a minimum of 35% affordable housing, of which 50% should be provided as social housing and 50% intermediate housing in the Old Kent Road Action Area. The adopted London Plan 2016 sets a requirement for affordable housing provision to comprise 60% social housing and 40% intermediate housing which is the most up to date development plan. The emerging New Southwark Plan sets a requirement for a minimum of 25% of all the housing to be

provided as social rented and a minimum of 10% intermediate housing to be provided, this equates to a split of 70% social housing and 30% intermediate housing. As such, the proposed development is in accordance with the emerging New Southwark Plan. Whilst the New Southwark Plan departs from the adopted London Plan provision of 60% social housing and 40% intermediate housing, the London Plan highlights that affordable housing targets can be set in light of local circumstances, provided a robust basis for implementing these targets is set out.

228. 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 beds 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 emerging Policy P1 requires a minimum 25% of homes to be provided as social rented housing which the proposed development complies with.
229. The affordable housing proposed would be provided in Blocks A, B1 and C2. Block A, which would provide 125 social rented units, including 41 family sized, three bed homes, which would be delivered in the first phases of development. Across the proposed development, there would be 55 social rented three bed homes and 26 intermediate three bed homes. The later phases would deliver a mix of private, social rented and intermediate housing. The Section 106 legal agreement would secure the delivery of these units, including clauses to prevent the occupation of more than 50% of the private apartments until 50% of the affordable units are completed in any phase, and a clause to prevent more than 90% of the private sale apartments being occupied across the development until 100% of the affordable housing is complete. In line with the Mayor's Affordable Housing and Viability SPG, an early review mechanism would be secured by the Section 106 agreement, which would come into effect if the development does not substantially commence within 24 months. The review would determine whether the viability of the development has improved during that time, and accordingly whether it could deliver any more affordable housing. As required by the GLA's Stage 1 response, a late stage viability review would also be secured.
230. Viability information has been submitted which supports the delivery of the quantum of affordable housing proposed. More detail on this is provided in paragraphs 505 - 509 of this report.
231. A contribution of £59,689.85 (a charge of £132.35 per affordable unit) has been agreed towards affordable housing monitoring and maintained provision of these units, and would be secured by the Section 106 Agreement.
232. The affordable housing would be owned and managed by A2Dominion Housing Association. A2 Dominion is one of London's largest affordable housing providers with over 37,000 existing properties under management and circa 8,000 more in the pipeline. The applicant has worked with A2Dominion on many other projects over a period of almost 20 years and together they have a track record of delivery throughout London. A2Dominion have been involved throughout the development of the proposals under consideration here, and are fully committed to the early delivery of the affordable housing and to its future long term management.

Housing Mix

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

Unit Type	Units	Percentage of total number of units
Studio	8	0.7%
1 bed	516	44.8%
2 bed	495	43%
3 bed	133	11.5%
Total	1,152	
2 or more bedrooms	628	54.5%

Table 13 Proposed Housing Mix Across All Tenures

Unit Type	Social Rented Units	Intermediate Units	Percentage of 35% affordable housing	"Additional" Intermediate Units	Total Affordable Units
Studio	0	0	0	0	0
1 bed	116 (41.9%)	47 (42.3%)	163 (42%)	30 (47.6%)	193 (42.8%)
2 bed	106 (38.3%)	44 (39.6%)	150 (38.7%)	27 (42.9%)	177 (39.2%)
3 bed	55 (19.9%)	20 (18%)	75 (19.3%)	6 (9.5%)	81 (18%)
Total	277	111	388	63	451
2 or more bedrooms	161 (58.1%)	64 (57.7%)	225 (58%)	33 (52.4%)	258 (57.2%)

Table 14 Proposed Housing Mix Across Affordable Tenures

235. At 0.7%, the proposed proportion of studio units is well under the policy maximum of 5%. Overall however, the proposals would fall short of the other housing mix policy requirements with only 54.5% of the dwellings having two or more bedrooms and 11.5% having three bedrooms. For the affordable housing however, the mix is much closer to the policy position, with 57.2% having two or more bedrooms and 18% having 3 bedrooms. This is even closer to the policy requirements if the "additional" intermediate is excluded. If this is broken down even further, of the proposed social rented dwellings, 58.1% would have two or more bedrooms and 19.9% would have three bedrooms.
236. Members must consider whether this overall shortfall of two and three bedroom units is of such concern that it would outweigh the other significant regeneration benefits of the scheme. Officers have identified these regeneration benefits elsewhere in this report. They include: an increase in the number of jobs on the site; a significant contribution to the borough's housing stock, including 451 affordable units, 81 of which would have 3 bedrooms; the proposed sports hall and gym facility; and the proposed new park. Officers consider that the wider benefits of the scheme would outweigh any harm caused by this shortfall in the housing mix.

Wheelchair Housing

237. 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 meets Building Regulations requirement M4 (2) 'accessible and adaptable' and 10% to meet Building Regulations requirement M4 (3) 'wheelchair user dwellings'. This is reiterated in emerging policy in the draft OKR AAP and the NSP.
238. Within the proposed development, 89.6% all of the residential units would meet Building Regulation M4(2) standards, and 10.4% would be fully adaptable and adjustable to wheelchair users, in compliance with M4(3) standards. This equates to 120 wheelchair accessible units, spread proportionately across all tenures and unit sizes, as shown in table 16 below. The wheelchair housing would be secured through the Section 106 Agreement. Level, safe access would also be provided throughout the proposed public realm and new park.

Unit Type	Social Rented	Intermediate	"Additional" Intermediate	Private	Total
Studio	0	0	0	0	0
1 bed	10	6	1	29	46
2 bed	15	3	1	42	61
3 bed	6	2	0	5	13
Total	31 (25.8%)	11 (9.2%)	2 (1.6%)	76 (63.3%)	120

Table 15 Proposed Wheelchair housing

Quality of Accommodation

239. Saved Policy 4.2 of the Southwark Plan 'Quality of Accommodation' requires developments to achieve good quality living conditions. The Council's Residential Design Standards SPD establishes minimum room and overall flat sizes, dependant on occupancy levels and requires dwellings to be dual aspect, to allow for good levels of light, outlook and cross-ventilation. This is reiterated in emerging policy in the draft OKR AAP and the NSP.
240. Throughout the course of the application, Officers have met with the design team on a number of occasions to agree amendments to residential design in order to improve the quality proposed. These discussions resulted in improvements including:
- Improved, direct access to communal amenity space;
 - Increases in the amount of private amenity space;
 - Improved stacking arrangements;
 - Improved and enlarged living spaces.

Privacy

241. The Residential Design Standards SPD recommends a minimum of 21m between the backs of properties to prevent any overlooking, and 12m where properties would face each other across a highway or other public realm. Between the residential floors of building A and building B1 there would be 48 m, which is more that sufficient to ensure no harm to residential amenity. The distance between building B2 and C1 would be 17 m, but these buildings do not sit parallel to each other, so there would be no direct overlooking. The distance between buildings C1 and C2 would be 21m which complies with the guidance in Southwark's Residential Design Standards SPD. No residential units are proposed at ground floor directly adjacent to the public realm, so there is no

concern about defensible space at this level. Where residential units overlook communal roof terraces, each would be provided with a defensible space to ensure privacy. In addition, the layout of the units within the buildings and locations of windows and balconies have been strategically arranged to minimise overlooking. Where balconies sit immediately adjacent to each other they would have privacy screens between them.



Figure 3 Overlooking and privacy distances

Aspect

242. Approximately 50% of the proposed units would be dual or corner aspect and 50% would be single aspect. This equates to 576 single aspect units and 576 dual or corner aspect units. Of the single aspect units, only 120 would be north facing (between North East and North West). This equates to 10.4% of the total number of units proposed, and 20.8% of the total number of single aspect units. 18 of the north facing single aspect units would be for social rent. None of the social rent, north facing, single aspect units would face the Old Kent Road. Instead, they would all be oriented towards the new landscaped space proposed at the centre of the scheme. Of all the single aspect units (north, east, south and west facing), there would be no three bedroom single aspect units, and only 90 would have two bedrooms. The vast majority (83%) would be one bedroom units. The majority of the single aspect units (64%) would also be private tenure. The distribution of single aspect units is broken down in Tables 16 and 17 below.

Building	Single aspect studios	Single aspect 1 bed	Single aspect 2 bed	Total
A	-	25 (9 north facing)	27 (9 north facing)	52 (18 north)

				facing)
B1	-	36 (12 north facing)	0	36 (12 north facing)
B2	8 (0% north facing)	162 (48 north facing)	30 (20 north facing)	200 (68 north facing)
C1	-	149 (22 north facing)	21 (0 north facing)	170 (22 north facing)
C2	-	106 (0 north facing)	12 (0 north facing)	118 (0 north facing)
Total	8 (0% north facing)	478 (19% north facing)	90 (32% north facing)	576 (20.8% north facing)
Proportion of total single aspect units	1.4%	83%	15.6%	

Table 16 Single aspect units by apartment size, including north facing units

Building	Single Aspect Social rented	Single aspect Intermediate	Single aspect "Additional" Intermediate	Single aspect Private	Total
A	52 (18 north facing)	-	-	-	52 (18 north facing)
B1	-	9 (3 north facing)	27 (9 north facing)	-	36 (12 north facing)
B2	-	-	-	200 (68 north facing)	200 (68 north facing)
C1	-	-	-	170 (22 north facing)	170 (22 north facing)
C2	80 (0%)	38 (0% north facing)	-	-	118 (0 north facing)
Total	132 (34.6% north facing)	47 (6.4% north facing)	27 (33% north facing)	370 (24.3% north facing)	576 (20.8% north facing)
Proportion of total single aspect units	23%	8.2%	4.7%	64 %	

Table 17 Single aspect units by tenure, including north facing units

243. Whilst this is a high proportion of single aspect units, it is considered that the low

proportion of single aspect north facing units (none of which would be for social rent), the low proportion of two bedroom single aspect units and the low proportion of affordable, single aspect units goes some way to mitigate the impact this would have. Mitigation is also proposed in the form of full height glazing, large opening windows and well laid out dwellings. Furthermore, over 70% of the units across the scheme would be oversized in terms of floorspace and all living rooms and bedrooms would have floor to ceiling heights of 2.55m. Members must consider whether this proportion of single aspect units is of such concern that it would outweigh the other significant regeneration benefits of the scheme (e.g. increased number of jobs, significant contribution to the borough's housing stock, including affordable housing, new sports hall and gym facility, new park). Officers consider that the wider benefits of the scheme would outweigh any harm caused by this proportion of single aspect units.

Unit Sizes

244. All of the dwellings proposed would satisfy the minimum floor areas set out in Southwark's Residential Design Standards SPD. 70% of the units would exceed these minimum floor areas, many substantially. All of the individual room sizes would also comply with the standards set out in the Residential Design Standards SPD.

Number of Units Per Core

245. One of the exemplary design standards in the Southwark Residential Design Standards SPD is to minimise corridor lengths by having an increased number of cores. Standard 12 of the Mayor's Housing Design SPG requires that each core should be accessible to generally no more than eight units on each floor. Concern about this was raised in the GLA's Stage 1 report.
246. Whilst it is acknowledged that there would be floors in the proposed development where the number of units served by a core would exceed eight, this is not the case across the whole development. Indeed, the submitted material demonstrates that on average the number of units per core in each of the proposed buildings would be 8. The floors that exceed eight units per core are set out in the following table:

Block	Floors with more than 8 units per core	Number of floors	No of units per core
A	1-9 (private)	9	10
B2	3-6 (private)	4	9
	16-24 (private)	9	9
	26-31 (private)	6	9
	32-39 (private)	8	9
C1	13-24 (private)	12	9
	26-34 (private)	9	9
C2	1-3 (social)	3	10
	4-6 (social)	3	9
	7-11 (social)	5	11

Table 18 Floors with more than eight units per core

247. Where the target of eight units per core is exceeded, the design mitigates for any harm this would cause by minimising corridor lengths where possible. For example in Block A, where a substantial proportion of the social rented units would be delivered, cores have been placed on corners, so that there are two corridors rather than one, significantly reducing the perception of the number of units per core. Other design techniques proposed to minimise any harm caused include generous corridor widths and the creation of distinctive arrival points upon leaving the lifts/stairs, ensuring a sense of arrival and address and reducing the anonymity caused by a high number of units per

core.

Internal light levels

248. An assessment of the daylight and sunlight amenity within the residential elements of the proposed development is reported in Chapter 17 of the submitted Environmental Statement Addendum and appendices. The assessment is based on Building Research Establishment (BRE) guidance and considers the potential light to the proposed dwellings using the Average Daylight Factor (ADF). ADF determines the natural internal light or daylight appearance of a room and the BRE guidance recommends an ADF of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens. Where a room serves more than one purpose, the minimum ADF should be for the room type with the highest value.
249. Of the 637 proposed rooms assessed 597 (94%) would meet the ADF standard recommended in the BRE Guidelines. All of the rooms in Block B would meet the BRE Guidelines' recommended levels of ADF. In Blocks C and A, only 40 rooms would not meet the recommended standard. These would consist of a mix of Lounge Kitchen Dining-Rooms, Living Rooms and Bedrooms. Where rooms are non-compliant, this is usually as a result of having a recessed balcony, which is considered advantageous in terms of the provision of amenity and quality of design, or the result of there being a balcony on the floor above, shading windows. There is often a trade-off in schemes of this size between the provision of private amenity space and the daylight penetration to the rooms with windows situated underneath balconies.
250. A balanced assessment of the importance of both aspects of quality residential design is required. Given the size and scale of development, the internal levels of daylight within the proposed dwellings are considered to be very good and indicative of exemplary residential design quality.

Outdoor Amenity Space

251. All new residential development must provide an adequate amount of useable outdoor amenity space. Southwark's Residential Design Standards SPD sets out the required amenity space standards, which can take the form of private gardens and balconies, shared terraces and roof gardens. In order to comply with the requirements of existing and emerging policy, including the Residential Design Standards SPD, the following private and communal amenity space should be provided:
- For units containing 3 or more bedrooms, 10sqm of private amenity space;
 - For units containing 2 bedrooms or less, ideally 10sqm of private amenity space, with the balance added to the communal space; and
 - 50sqm communal amenity space per block.
252. In the proposed development, private amenity would be provided for the majority of residential units in the form of balconies. Communal amenity spaces for residents would be provided in the form of roof terraces, in the locations indicated in Table 19. These terraces would provide opportunities for seating, play and recreation. All amenity terraces would also provide water attenuation, as 'green blue roofs'. Other roof spaces not used for amenity (except in the towers), would provide attenuation as well as a brown roof component, making them 'brown blue roofs'.

Building	Location of Roof terrace Amenity	Area of roof terrace (sqm)
A	1 st floor	623
	10 th floor	372
B1	1 st floor	919

	15 th floor	535
B2	1 st floor	508
C1	-	-
C2	1 st floor	163
	12 th floor	207
Total		3,327

Table 19 Communal amenity on roof terraces

253. It was agreed with Officers during pre application discussions that for a proportion of the private tenure apartments, it would be acceptable to have no private external balcony, but rather provide larger internal living spaces. It is subsequently proposed that a total of 290 units would not have a balcony, which equates to 25% of the total. Where no private balcony is proposed, all living spaces would exceed the minimum floor space required. In addition, many of the units that do have a balcony would also be oversized. All affordable units, both social rent and intermediate, would have a balcony. This approach has been design led, and the omittance of a balcony was only agreed in circumstances where:

- The height of the towers could result in uncomfortable conditions on external balconies (particularly wind conditions);
- The additional amenity space being included into the living areas of the flat creates a more spacious, better laid out flat and gives more options to future residents;
- It allows for higher levels of natural light because there are no balconies to shade windows below; and
- It allows corner flats to take full advantage of dual aspect views and daylight.

254. In line with the Southwark Section 106 and CIL SPD, any shortfall in the required provision of amenity space will be charged at £205 per square metre. This represents the average cost in Southwark for improving open spaces. This will be secured through the Section 106 Agreement.

255. The private amenity shortfall and communal amenity proposed for each building is set out in the table below. This takes account of units where balconies have been 'internalised':

	Balcony shortfall (sqm)	Balcony shortfall, taking account of extra internal living space (sqm)	Communal terrace proposed (sqm)	Private and Communal amenity shortfall (sqm)
Building A (125 apartments)	300 shortfall (Maximum total required 1,250)	166 shortfall	995	None (+829 over requirements)
Building B1 (84 apartments)	179 shortfall (Maximum total required 840)	118 shortfall	919	None (+801 over requirements)
Building B2 (377 apartments)	2,401 shortfall (Maximum total required 3,770)	741 shortfall	1,043	None (+302 over requirements)
Building C1	2,227 shortfall	664 shortfall	163	501 shortfall

(324 apartments)	(Maximum total required 3,240)			
Building C2 (242 apartments)	543 shortfall (Maximum total required 2,420)	344 shortfall	207	137 shortfall
Total	5,650 shortfall (Maximum total required 11,520)	2,033 shortfall	3,327	638

Table 20 Private and Communal Amenity Space, including maximum total private amenity space that would be required if a 10 sqm balcony were provided for every unit

256. The figures in the table above indicate that there would be a small short fall of 638 sqm of amenity space in buildings C1 and C2. In addition, 50sqm is required per block as per the Residential Design Standards SPD. This comes to a total shortfall of 788 sqm, which would require a financial contribution of £161,540. This would be secured through the Section 106 Legal Agreement.
257. Developers sometimes seek to vary consents having got planning permission by including additional units in later revised schemes within the same built envelope. This scheme is supported because of its oversized units. Any future attempt to vary this would not be supported.

Children's Play Space

258. 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). This is reiterated in Southwark's Residential Design Standards SPD and the Section 106 and CIL SPD.
259. In line with the Mayor's Providing for Children and Young People's Play and Informal Recreation SPG, the proposed development would be required to provide 3,087.6 sqm of children's play space. The submission material sets out a variety of different typologies of play provision across different areas of the public open space at ground floor and on the communal roof terraces. A total area of 5,137 sqm of potentially playable space across the development, consisting of formal play structures, incidental play features and informal play/playable landscape features is identified. The submitted material indicates in principle where these play spaces would be delivered, but they have not yet been designed in detail, so a precise area calculation is not available. A planning condition requiring detailed design is recommended. Officers are satisfied that, due to the overall generosity of the open space proposed, the proposal to provide a publicly accessible four court sports hall and gym facility and the agreement of the applicant to meet the draft OKR AAP emerging policy requirements for public open space, despite their very limited weight (see paragraphs 260 - 261 below), this is an acceptable approach.

Public Open Space

260. In addition to the existing amenity space requirements set out above, emerging Policy AAP10 of the draft OKR AAP requires the provision of 5sqm of public open space per dwelling or a financial contribution in lieu. The 1,152 dwellings proposed here would require a provision of 5,760 sqm public open space under this emerging policy. The proposed development would deliver 4,301 sqm of publicly accessible open space,

which results in a shortfall of 1,459 sqm, although it is noted that the new publicly accessible sports hall would be 1,773 sqm. Although this emerging policy currently has very limited weight, the applicant has agreed to make the required financial contribution of £299,095 based on a cost of £205 per sqm. As set out in the Southwark Section 106 and CIL SPD, £205 per sqm represents the average cost in Southwark for improving open space. This would be secured through the Section 106 Agreement and could be spent on future public realm enhancements around Canal Grove Cottages (as proposed in the draft OKR AAP).

261. The applicant has paid £31,336 towards the cost of saving a number of steel structural elements from Gas Holder 12 from the Old Kent Road Gas Works, which has recently been demolished. These steels would be re used in the new park at the centre of the proposed development as sculptural wind baffles. Should planning permission be granted, this cost would be deducted from the overall open space financial contribution required. This would result in a contribution of £267,759, which will be secured through the S106 Agreement.

Secure By Design

262. The application has been reviewed by the Metropolitan Police Secure by Design Advisor who is satisfied that, should this application proceed, it would be able to achieve the security requirements of both the Secured by Design Homes 2016 and Commercial 2015 guides. Planning conditions requiring the proposed development to adhere to the principles and physical security requirements of Secured By Design are included with the recommendation.

Conclusion on quality of residential accommodation

263. To conclude, Officers are satisfied that the quality of residential accommodation proposed would be high and would justify the high density of the scheme. Whilst there would be a relatively high proportion of single aspect units, and there would be floors where more than eight units would be served by a single core, the design would include measures to mitigate these concerns. Members should weigh these aspects of the residential design, which would be contrary to the Southwark Residential Design Standards SPD and the Mayor's Housing Design SPG, against the positive aspects of the residential design, including good privacy and outlook, good internal daylight levels and good provision of outdoor amenity space and children's play space, as well as the other major regeneration benefits of the scheme. As set out above, the other regeneration benefits of the scheme include job creation, the provision of good quality commercial space, a sizeable contribution to the borough's housing stock (including affordable housing), the provision of a new public sports hall and gym facility and a new park.

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

264. London Plan (2016) Policy 7.6 states that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and micro-climate. London Plan (2016) Policy 7.7 notes that large buildings should not adversely affect their surroundings in terms of overshadowing and solar reflected glare. Strategic Policy 13 of the Core Strategy, 'High Environmental Standards', seeks to ensure that development sets high standards for reducing air, land, noise and light pollution and avoiding amenity and environmental problems that affect how we enjoy the environment in which we live and work; Saved Policy 3.2 of the Southwark Plan states that permission will not be granted for developments where a harmful loss of amenity, including disturbance from noise, would be caused. The adopted Residential Design Standards SPD expands on

policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.

Impact of the proposed uses

265. For many years, the application site has operated as an industrial estate, including a scrap metal yard, in close proximity to residential properties. The proposed non-residential floorspace would be likely to be more compatible with residential uses than these existing uses. With the exception of the convenience store proposed fronting onto the Old Kent Road (and some distance from any existing residents), the retail uses proposed would be very modest in scale. The noise transmission would be controlled by planning conditions, as recommended by the Council's Environmental Protection Team. Overall it is not considered that any of the uses proposed would result in any significant loss of amenity to neighbouring residential occupiers, nor would they hinder the operation of the neighbouring industrial and warehousing units on the rest of the Sandgate Trading Estate, Gasworks and Devon Street cluster.

Agent of Change

266. In their Stage 1 report, the GLA required the 'Agent of Change' principle to be examined in relation to the proposed development. Paragraph 182 of the NPPF defines the Agent of Change principle as follows: "Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed." It is considered that the proposed development would integrate well with existing businesses surrounding the site. The position of residential uses at first floor and above would go some way to ensuring that any noise nuisance would be mitigated for example. Furthermore, the building façade design, including glazed elements, would be designed to achieve the internal noise criteria defined within BS 8233: 2014 as detailed within Southwark Council's Technical Guidance for Noise.

Privacy and Overlooking

267. As stated above, in order to avoid harmful overlooking and ensure no harm to privacy, Southwark's Residential Design Standards SPD recommends a minimum of 21m between the backs of properties and 12m where properties would face each other across a highway.
268. The nearest existing residential properties to the proposed development are the Grade II listed Canal Grove cottages. At the closest point these would be approximately 21m from the proposed development, and therefore in accordance with the guidance in the SPD. It is worth noting that the proposed development would face the rear of the Canal Grove properties.
269. Concerns have been raised that the proposed development would prejudice the development potential of the Kent Park Industrial Estate to the east of the proposed development. The distance between the front of the buildings proposed on Ruby Street and the back edge of pavement on the other side of the road is approximately 14.5m. This demonstrates that there would be an acceptable distance between the proposal under consideration here and any future development proposals on this adjacent site.

Daylight and sunlight

270. Chapter 17 of the ES Addendum considers the potential daylight, sunlight, overshadowing and light pollution impacts of the proposed development on surrounding residential properties. This analysis is based on guidance published by the Building Research Establishment (BRE) and Institute of Lighting Professionals (ILP).

271. In relation to daylight, sunlight and overshadowing, Members should note that the BRE Guidelines are based on a suburban environment, and as such a degree of flexibility needs to be applied when considering an urban environment such as the application site. It is also important to note that the existing scale of development on the application site is exceptionally low for an urban location. This establishes a baseline situation that exceeds the normal expectations of an urban area, and reductions would be expected to result from any development here. Paragraph 123 of the NPPF (2018) also states that:

“Local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).”

272. The BRE Guidelines also state that residential properties warrant detailed consideration in terms of daylight and sunlight effects, but that properties of a commercial nature have a lower requirement. As such, the submitted daylight and sunlight assessments relate to existing residential properties only. It is not necessary for any future redevelopment proposals for this site to be assessed as cumulative development under the EIA regulations (2017), as no plans have yet been submitted and this requirement is restricted to “other existing development and/or approved development”.

Daylight Impacts

273. The ES considers the daylight impacts of the proposed development on 1056 windows serving 509 residential rooms surrounding the application site. As required by the ES Regulations, the submitted assessment has been undertaken by competent, experienced, registered professionals. The following tests have been undertaken:

Test	Description	BRE Criteria	Baseline Conditions
Vertical Sky Component (VSC)	The amount of skylight reaching a window expressed as a percentage	A window may be adversely affected if the VSC measured at the centre of the window is less than 27% and less than 0.8 its former value. Experienced daylight and sunlight assessors suggest that 20% VSC is a good level of daylight for a dense urban location and a VSC above 15% is adequate.	In the current situation, 67% of the surrounding properties benefit from greater than 27% VSC.
No-Sky Line (NSL) or daylight distribution	The area of a room at desk height that can see the sky	A room may be adversely affected if the daylight distribution (no sky line) is reduced beyond 0.8 times its existing area.	In the current situation, 94% of the rooms within the surrounding properties benefit from direct skylight at desk height to greater than 80% of the current room area.
Average Daylight Factor (ADF)	The daylight appearance of a room	ADF of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens. Where a room serves more than one purpose, the minimum ADF should be for the room type with the highest value.	In the current situation, 24% of the rooms within the surrounding properties achieve the 2% ADF target recommended in the BRE Guidelines for Lounge/Kitchen/Dining-rooms in new development.

Table 21 Daylight impact assessment undertaken

274. The results of the assessment show that 60% of the windows tested (631 out of 1056) would still meet the recommended VSC levels (27% VSC) once the proposed development is constructed, and that 94% of the rooms tested (478 out of 509) would still meet the recommended NSL levels.
275. Average Daylight Factor (ADF) has also been tested, but as not all of the room uses and layouts of the neighbouring properties have been verified, these have not been relied upon. The BRE guidance suggests that ADF is less relevant when used to assess impact upon existing properties.
276. The proposed development would result in BRE compliant VSC and NSL reductions (i.e. not less than 0.8 times their former value) to the windows and rooms the following properties:
- 14 Ruby Street
 - 2a Ruby Street
 - 681 Old Kent Road
 - Nos. 10 – 36 (even) Ethnard Road
 - Nos. 1 – 17 (odd) Ethnard Road
 - 634 Old Kent Road
 - 636 Old Kent Road
 - 622 Old Kent Road

- 624 Old Kent Road
- 610 Old Kent Road
- 612 Old Kent Road
- 614 Old Kent Road
- 1 Peckham Park Road
- 3 Peckham Park Road

277. The remaining properties would experience a degree of harm in excess of the BRE guidelines. In the instances set out in Table 21, although the VSC reductions to *some* of the windows serving these properties would not be BRE compliant, the NSL reductions would remain within the acceptable range established by the BRE. In these instances it is recognised that there would be a degree of harm to the daylight amenity of residents, but this harm would be minor and acceptable in an urban location. Although the amount of skylight reaching the windows would be reduced, the reduction in the proportion of room area that could see the sky at desk height would not be materially altered. Given the urban context of the site and the low level of existing development on the application site, these results are indicative of a relatively good retained level of daylight.

Property	VSC % of former value (BRE guidance >80%)	NSL % of former value (BRE guidance >80%)
1 Canal Grove	5/8 windows tested would fall below BRE guidelines. Between 68.17% and 99.29% of former value (% losses of 0.71% to 31.83%).	Between 85.6% and 100% of former value (% losses of 0% to 14.4%).
4 Canal Grove	5/5 windows tested would fall below BRE guidelines. Between 56.21% and 77.43% of former value (% losses of 22.57% to 43.79%).	Between 93.7% and 100% of former value (% losses of 0% to 6.3%).
6 Canal Grove	3/6 windows tested would fall below BRE guidelines. Between 58.56% and 95.09% of former value (% losses of 4.91% to 41.44%).	Between 81.8% and 100% of former value (% losses of 0% to 18.2%).
670-672 Old Kent Road	28/40 windows tested would fall below BRE guidelines. Between 60.77% and 100% of former value (% losses of 0% to 39.23%).	Between 94.7% and 100% of former value (% losses of 0% to 5.3%).
Nos. 648 - 668 (even) Old Kent Road	146/166 windows tested would fall below BRE guidelines. Between 50.83% and 89.03% of former value (% losses of 10.97% to 49.17%).	Between 92.7% and 100% of former value (% losses of 0% to 7.3%).
644-646 Old Kent Road	49/93 windows tested would fall below BRE guidelines. Between 49.8% and 100% of	Between 84.6% and 100% of former value (% losses of 0% to 15.4%).

	former value (% losses of 0% to 50.02%).	
Nos. 2 – 8 (even) Ethnard Road	14/28 windows tested would fall below BRE guidelines. Between 63.4% and 99.7% of former value (% losses of 0.30% to 36.60%).	Between 91% and 99.4% of former value (% losses of 0.6% to 9%).
399 Rotherhithe New Road	15/227 windows tested fail. Between 51.25% and 100% of former value (% losses of 0% to 48.79%).	Between 89.6% and 100% of former value (% losses of 0% to 10.4%).

Table 22 Properties where VSC changes would be material, (according to BRE recommended levels) but NSL would not.

278. In the properties identified in Table 22, the VSC and NSL alterations would both exceed the BRE guidelines, but would either remain above 70% of their baseline values or, if not, the room's main window/s would retain at least 18% VSC and at least 50% of the area of the room would still benefit from direct skylight at desk height (NSL). Again, in these instances it is recognised that there would be a degree of harm to the daylight amenity of residents, but these remaining daylight levels are considered acceptable for an urban environment.

Property	VSC - % of former value BRE guidance >80%	Remaining VSC	NSL - % or former value BRE guidance >80%	Remaining NSL (% of room area)
2 Canal Grove	8/8 windows tested would fall below BRE guidelines. Between 61.98% and 79.99% of former value (% losses of 20.01% to 38.02%).	11.97 – 21.23%	1/5 rooms tested would fall below BRE guidelines Between 75.6% and 93.2% of former value (% losses of 6.8% to 24.4%).	72 -89.95%
3 Canal Grove	6/8 windows tested would fall below BRE guidelines. Between 65.37% and 95.58% of former value (% losses of 4.42% to 34.63%).	16.62 – 22.70%	1/5 rooms tested would fall below BRE guidelines Between 76.8% and 97.1% of former value (% losses of 2.9% to 23.2%).	73.32 – 93.10%

Nos. 628 – 632 (even) Old Kent Road	12/13 windows tested would fall below BRE guidelines. Between 59.39% and 100% of former value (% losses of 0% to 40.61%).	22.52 – 36.45%	3/9 rooms tested would fall below BRE guidelines Between 64.8% and 88.7% of former value (% losses of 11.3% to 35.2%).	64.10 – 86.98%
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Table 23 Properties where both VSC and NSL would fall below BRE recommended levels, but would retain acceptable daylight levels for an urban area.

279. The following paragraphs set out the daylight impacts on the remaining properties tested.
280. At 5 Canal Grove all seven windows tested would experience VSC reductions beyond the levels recommended by the BRE (reductions to between 45.61% and 70.51% of their existing values / % losses of 29.49% to 54.39%). The resultant VSC levels would be between 9.41 and 24.38%. These windows are thought to serve five rooms, comprising a kitchen, bedrooms and bathrooms. The BRE guidelines advise that bathrooms can be discounted and bedrooms have lower requirements for daylight than main habitable rooms such as living-rooms. It is also worth noting that, as these windows currently look out over an underdeveloped portion of the application site, the existing VSC levels are unusually high for an urban location.
281. The NSL results demonstrate that four out of the five rooms tested would still benefit from direct skylight at desk height to over 85% of the total room area, which is considered a good level of daylight amenity in an urban location. The remaining room would have direct skylight at desk level over 45% of the total room area, which is considered adequate for a dense urban location.
282. At 7 Canal Grove, all six windows tested would experience VSC reductions beyond the levels recommended by the BRE (reductions to between 39.1% and 52.59% of their existing values / % losses of 47.41% to 60.90%). The resultant VSC levels would be between 8.43 and 18.35%. These windows are thought to serve four rooms comprising a kitchen, bedrooms and bathrooms. As stated above, such rooms have lower requirements for daylight than main habitable rooms such as living-rooms. It is also worth noting these windows also currently look out over an underdeveloped portion of the application site, so the existing VSC levels are also unusually high for an urban location.
283. The NSL results demonstrate that all four rooms in this property would still benefit from direct skylight at desk height to over 50% of the total room area, which is considered an adequate level of daylight amenity in an urban location.
284. At 8 Canal Grove all six windows tested would experience VSC reductions beyond the levels recommended by the BRE (reductions to between 42.51% and 50.7% of their existing values / % losses of 49.30% to 57.49%). The resultant VSC levels would be between 10.71 and 17.79%. These windows are thought to serve four rooms comprising kitchen, bedrooms and bathrooms, with lower requirements for daylight than main habitable rooms. They also currently look out over an underdeveloped portion of the

application site, so their existing VSC levels are unusually high for an urban location

285. The NSL results demonstrate that two of the four rooms would still benefit from direct skylight at desk level to over 60% of the total room area, which is considered a good level of daylight amenity in an urban location. The remaining two rooms would experience reductions to 43% and 39% of the room areas. It is understood that one of these rooms is a bedroom, which the BRE guidelines places less significance upon in daylighting terms.
286. In 10-13 Canal Grove, four out of the twelve windows tested would meet the recommended VSC levels. The eight remaining windows that would experience reductions beyond recommended VSC levels (reductions to between 38.58% and 50.72% of their existing values / % losses of 49.28% to 61.42%). The resultant VSC levels would be between 11.27 and 23.94%. These windows are thought to serve eight rooms comprising kitchen, bedrooms and bathrooms, with lower requirements for daylight than main habitable rooms. It is also worth noting that the windows currently look out over an underdeveloped portion of the application site, so the existing VSC levels are unusually high for an urban location.
287. The NSL results demonstrate that five out of these eight rooms would meet the BRE Guidelines. The remaining three remaining rooms would still benefit from direct skylight at desk height to over 70% of the total room area, which is considered a good level of daylight amenity in an urban location.
288. In 14-17 Canal Grove, four out of twelve windows would meet the recommended VSC levels. The eight remaining windows would experience reductions in VSC beyond the BRE recommended levels (reductions to between 31.58% and 79.39% of their existing values / % losses of 20.61% to 68.42%). The resultant VSC levels would be between 8.84 and 25.72%. These windows are thought to serve eight rooms comprising kitchen, bedrooms and bathrooms with lower requirements for daylight than main habitable rooms. It is also worth noting that the windows currently look out over an underdeveloped portion of the application site, so the existing VSC levels are unusually high for an urban location.
289. The NSL results demonstrate that two out of these eight rooms would meet the advisory levels recommended in the BRE Guidelines. The remaining six rooms would still benefit from direct skylight at desk height to over 60% of the total room area, which is considered a good level of daylight amenity in an urban location.
290. In 635 Old Kent Road, the two windows tested would experience reductions in VSC beyond the BRE recommended levels (reductions to between 19.02% and 23.67% of their existing values / % losses of 76.33% to 80.98%). The resultant VSC levels would be between 5.69 and 7.09%. Both are thought to serve bedrooms which have lower requirements for daylight than main habitable rooms.
291. The NSL results demonstrate that both rooms would still benefit from direct skylight at desk height to over 50% of the total room area, which is considered an adequate level of daylight amenity in an urban location.
292. In 1-30 Lynn House, 24 out of 94 windows tested would meet the recommended VSC levels. The remaining 70 windows would experience reductions in VSC beyond the BRE recommended levels (reductions to between 38.05% and 78.07% of their existing values / % losses of 21.93% to 61.95%). The NSL results demonstrate that all rooms at Lynn House (100%) would meet the levels recommended in the BRE Guidelines

Sunlight

293. 625 predominantly south-facing windows, serving 293 residential rooms, have been tested for sunlight amenity using the Annual Probable Sunlight Hours (APSH) methodology:

Test	Description	BRE Criteria	Baseline Conditions
Annual Probable Sunlight Hours (APSH)	The amount of sunlight a window receives. This should be considered for all windows facing within 90 degrees of due south (windows outside of this orientation do not receive direct sunlight in the UK).	A window may be adversely affected if it receives for a whole year, less than 25% APSH, including at least 5% APSH during the winter months (21 September to 21 March), less than 0.8 times its former sunlight hours during either period, and if there is a reduction in total APSH which is greater than 4%.	In the current situation, 39% of the rooms within the surrounding properties benefit from at least 25% total APSH, with at least 5% APSH in the winter months which, according to the BRE Guidelines, is sufficient to give reasonable sunlight amenity results in a suburban environment.

Table 24 APSH Test.

294. The APSH results show that 96% of the rooms tested (280 out of 293) would meet the levels recommended by the BRE Guidelines.
295. The following properties would experience minor detrimental impacts on their sunlight amenity, or already have sunlight amenity below BRE guideline levels:

Property	APSH Results
1 Canal Grove	Of the five rooms tested, four would experience APSH reductions greater than 4%, but all APSH values would remain above those recommended by BRE.
2 Canal Grove	All 5 rooms tested would experience APSH reductions greater than 4%, but all APSH values would remain above those recommended by BRE
3 Canal Grove	All 5 rooms tested would experience APSH reductions greater than 4%, but all APSH values would remain above those recommended by BRE
8 Canal Grove	All 4 rooms tested would experience APSH reductions greater than 4%, but all APSH values would remain above those recommended by BRE
670-672 Old Kent Road	Winter APSH below would be below 5% in three rooms and annual APSH below 25% in two rooms, but this is <u>as existing</u> . I.e. these rooms don't meet BRE guidelines in existing condition
Nos. 2 – 8 (even) Ethnard Road	No change - but levels are already below BRE guidelines in some rooms.
Nos. 15, 19, 23 and 27 Ethnard Road	No change - but levels are already below BRE guidelines in some rooms.
1-30 Lynn House	Some windows are already below BRE guidelines. There would be no loss over 4%
Nos. 610 and 630 Old Kent Road	1 window tested would experience a loss greater than 4%, but the results would remain above guideline levels.
Nos. 1 and 3 Peckham Park Road	All three rooms tested would have losses greater than 4%, but results would remain above guideline levels.
399 Rotherhithe Road	Of 152 rooms tested, 74 would experience losses over 4% but only 16 would not have 25% APSH and only 1 would not have 5% winter APSH.

Table 25 Properties that would experience minor detrimental impacts on their sunlight amenity, or already have sunlight amenity below BRE guideline levels.

296. The following properties would experience APSH alterations that are beyond BRE Guidelines, with losses ranging from 10.3% to 68.6%:

- 4 Canal Grove
- 5 Canal Grove
- 6 Canal Grove
- 7 Canal Grove
- 9 Canal Grove
- 10-13 Canal Grove
- 14-17 Canal Grove

297. Despite these apparently significant losses, most would retain a level of sunlight amenity that is considered good for an urban environment. This is because the existing development on the application site is so low that the existing sunlight amenity enjoyed

by these properties is exceptionally high.

298. In 4 Canal Grove, three of the four rooms tested would retain BRE compliant levels of sunlight amenity. The one room that would not be BRE compliant would retain an annual APSH of 13% and winter APSH of 2%. The window serving this room is already obscured by the rear wings of nos. 4 and 5 Canal Grove.
299. In 5 Canal Grove, four of the five rooms tested would retain BRE compliant levels of sunlight amenity. The one room that would not be BRE compliant would retain an annual APSH of 11% and winter APSH of 2%. The window serving this room is already obscured by the rear wings of nos. 5 and 6 Canal Grove.
300. In 6 Canal Grove, three of the four rooms would retain BRE compliant levels of sunlight amenity. The 1 room that would not be BRE compliant would retain an annual APSH of 15% and winter APSH of 3%. The window serving this room is already obscured by the rear wings of nos. 5 and 6 Canal Grove.
301. In 7 Canal Grove, two of the four rooms tested would retain BRE compliant levels of sunlight amenity. The remaining 2 rooms would retain an annual APSH of 21% and 24% respectively. Both rooms would retain a winter APSH of 4% and 5%. These results are only marginally below the advisory levels recommended in the BRE Guidelines, and still considered a good level of sunlight amenity for a dense urban location.
302. In 9 Canal Grove three of the four rooms tested would retain BRE compliant levels of sunlight amenity. The remaining room would retain an annual APSH of 31%, but a winter APSH of only 3%. This annual result is BRE compliant, but the winter level is below the advisory level recommended in the BRE Guidelines. It is still considered a good level of sunlight amenity for a dense urban location.
303. In 10-13 Canal Grove, seven of the ten rooms tested would retain BRE compliant levels of sunlight amenity. The three remaining rooms would retain an annual APSH of 23% and 24%. All rooms would retain a winter APSH in excess of 5%. These results are only marginally below the advisory levels recommended in the BRE Guidelines, and are still considered a good level of sunlight amenity for a dense urban location.
304. In 14-17 Canal Grove, four of the eight rooms tested would retain BRE compliant levels of sunlight amenity. The remaining four rooms would retain an annual APSH of 22% to 24%. All rooms would retain a winter APSH in excess of 5%. These results are only marginally below the advisory levels recommended in the BRE Guidelines, and are still considered a good level of sunlight amenity for a dense urban location.

Overshadowing

305. The following tests were undertaken on the rear gardens of 1-17 Canal Grove:

Test	Description	BRE Criteria	Baseline Conditions
Sun on Ground	Area where the sun would reach the ground and where it would not on the Spring Equinox (21 st March)	For a garden or amenity area to appear adequately sunlit throughout the year, no more than half (50%) of the area should be prevented by buildings from receiving two hours of sunlight on the 21st March each year.	
Transient Overshadowing	The shadows cast over an open space at the following key dates thorough the year: <ul style="list-style-type: none"> • 21st March (Spring Equinox); • 21st June (Summer Solstice); and • 21st December (Winter Solstice). 	For an outdoor area to appear adequately sunlight throughout the year, at least half of the garden or amenity area should receive at least 2 hours of sunlight on 21st March. If the area which can receive two hours of sun on 21st March is less than 0.8 times its former value, the loss of sunlight is likely to be noticeable	Due to the exceptionally low heights of the existing buildings on the application site, they cast virtually no transient shadow upon the rear gardens at 1-9 Canal Grove and 14-17 Canal Grove on the 31 March, 21 June and 21 December. This is unusual for an urban location.

Table 26 Overshadowing tests

306. The Sun on Ground and transient overshadowing results demonstrate that all rear gardens at nos. 1-17 Canal Grove would comply with the overshadowing guidelines recommended by the BRE.

Cumulative Impacts on daylight, sunlight and overshadowing

307. The submitted ES states that the only proposed development within close proximity to the application site that could have an effect on daylight or sunlight amenity is the Malt Street Regeneration scheme. The location of this proposal would however, result in a negligible effect on the windows, rooms and open spaces tested

Conclusion on daylight, sunlight and overshadowing impacts

308. In conclusion in relation to daylight, sunlight and overshadowing impacts on existing properties surrounding the site, the results of the submitted analysis demonstrate that most of the residential properties tested would not experience any harmful change once the proposed development is built. The massing of the proposed scheme was revised during the pre application process, particularly the lowering and setting back of building B1 to reduce harm to the Canal Grove cottages. Some properties would however still experience some harmful changes. Members need to balance this loss to amenity against the other significant regeneration benefits of the proposed development, as set out elsewhere in this report.

Solar Glare

309. The potential impacts of solar glare resulting from the sun reflecting off the proposed buildings have been considered. As there would be no excessively large areas of reflective, tinted glass or other reflective cladding, harmful solar glare is considered very unlikely. The balconies proposed would also help to prevent glare. In terms of cumulative impact, it is not considered that any proposed developments within close proximity to the application site would have an effect on solar glare.

Light Pollution

310. The closest residential buildings to the proposed development that have the potential to be affected by light pollution are located on Canal Grove and Old Kent Road. These were tested against a 'worst case scenario' using the level of light spillage from a typical office; with light internal finishes, 0.68 transmittance glazing, the working plane illuminated to a range of 300-500 lux, and no blinds or curtains against the following guidance:

Test	Description	ILP Criteria
Light Intrusion	Any light emitting from artificial sources into spaces where it is unwanted or causes a nuisance.	The Institute of Lighting Professionals (ILP) Guidance Notes provide measurable lighting level values to assess light intrusion in different contexts. The context of the application site is described as "E4- High District Brightness (e.g. town/city centres with high levels of night time activity)". The ILP notes suggest light intrusion into windows in this context should not exceed 25 Ev (Vertical Illumination in lux) before the ILP identified 'curfew' begins and 5 Ev after any curfew*.

* Curfew = The time after which stricter requirements (for the control of obtrusive light) will apply; often a condition of use of lighting applied by the planning authority. 23.00 hrs is suggested.

Table 27 Light pollution tests

311. This submitted analysis shows that the rear windows at nos. 1 to 9 Canal Grove would fall within the recommendation of the ILP guidance for Zone E4. There would be approximately 15 lux recorded to the windows in the rear of nos. 10 to 17 Canal Grove. This is below the pre-curfew recommendation of 25 lux, but above the post-curfew of 5 lux. The submitted ES also recommends that it is unlikely the entire building would be lit as the worst case scenario described above, especially throughout the night. A well considered lighting design would be likely to reduce the light spillage levels to within ILP guidance. This would be required by condition.
312. In terms of cumulative impact, there are no proposed developments within close proximity to the application site that could have an effect on light pollution.

Wind and Microclimate

313. Chapter 18 of the ES Addendum assesses the likely impacts of the proposed development on wind and microclimate in terms of pedestrian safety and comfort using a computer model. It concludes that some of the new buildings would affect the speed and direction of wind flows and could result in pedestrian discomfort, especially around the northern end of the site at the base of the two tallest buildings. As a result, the proposed

design has tested numerous options to reduce these impacts to a safe and comfortable level, and concluded that planting trees and installing wind baffles in the new park would ensure pedestrian comfort. The baffles would be arranged to allow access for emergency vehicles.

314. The Lawson Criteria have been applied to determine the acceptability of wind for pedestrian safety and comfort. The Lawson Safety Criteria identify areas where people could find walking difficult, or even stumble and fall. This establishes wind speeds not to be exceeded for more than 0.025% of the year (approximately 2 hours/year). These safety criteria are set in the table below:

Safety Rating	Threshold mean hourly wind speed exceeded once per annum (0.025%)	Wind conditions as experienced by people	Safety concern
Unsuitable for the general public (S15)	>15 m/s	Less able and cyclists find conditions physically difficult.	Areas accessible to the general public: sitting areas, standing areas, walking areas.
Unsuitable for able-bodies (S20)	>20 m/s	Able-bodied persons find conditions difficult. Physically impossible to remain standing during gusts.	Areas with limited public access, maintenance areas, car parks, motorways.

Table 28 The Lawson Safety Criteria

315. The Lawson Comfort Criteria establish wind speeds that should not be exceeded for more than 5% of the time in a season in order to ensure pedestrian comfort for different activities. These criteria are set out in the table below:

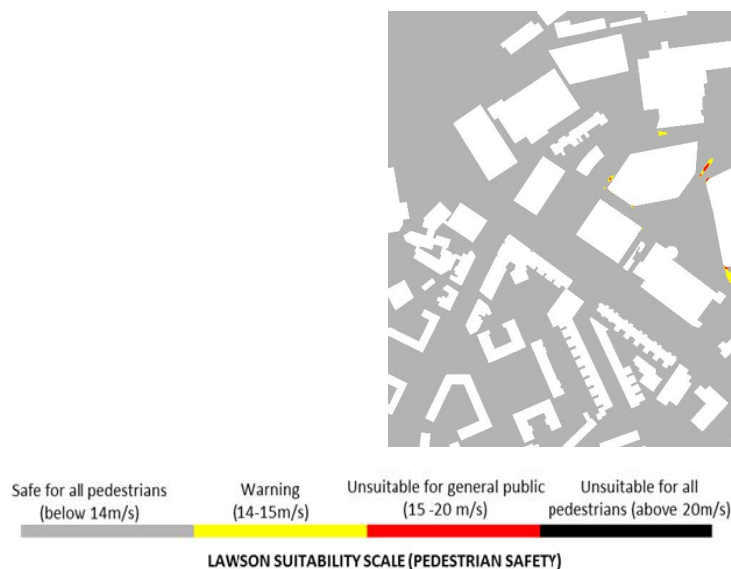
Comfort Category	5% Exceedance Threshold	Description
Sitting	<4 m/s	Light breezes desired for outdoor restaurants and seating areas where one can read a paper or comfortably sit for long periods.
Pedestrian standing	<6 m/s	Gentle breezes suitable for main building entrances, pick-up/drop-off points and bus stops.
Strolling	<8 m/s	Moderate breezes that would be appropriate for strolling along a city/town centre street, plaza or park.
Business Walk	<10 m/s	Relatively high speeds that can be tolerated if one's objective is to walk, run or cycle without lingering.
Roads/ Car Park	>10 m/s	Winds of this magnitude are considered a nuisance for most activities, and wind mitigation is typically recommended.

Table 29 The Lawson Comfort Criteria

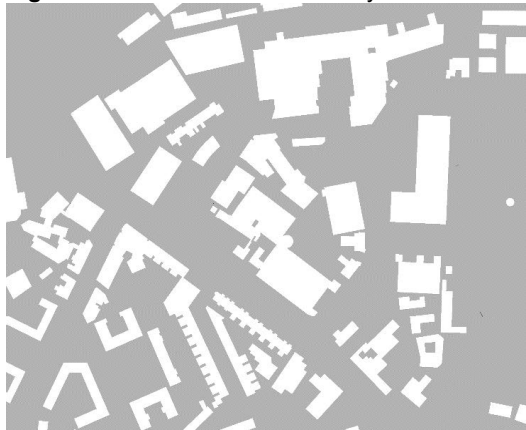
316. The results of the submitted wind and microclimate assessment indicate that the existing

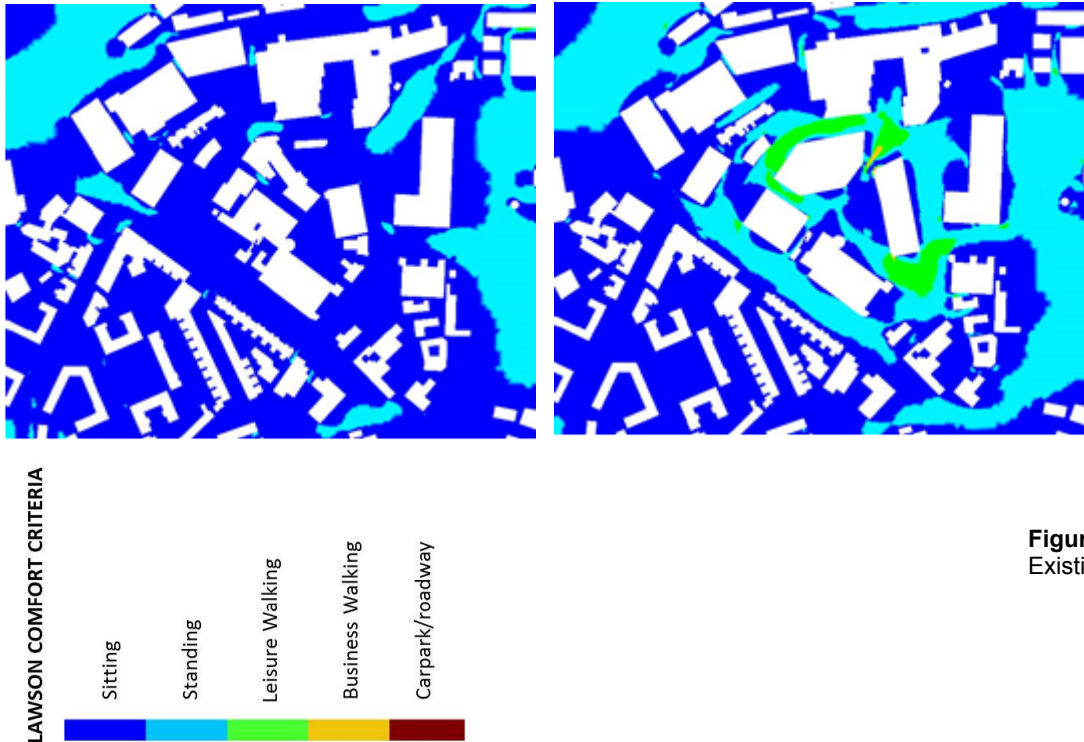
wind environment of the application site is generally suitable for pedestrian activities. All of the areas tested, both inside and outside the application site would fall within the recommended criteria for safety and comfort.

317. During demolition, wind speeds would be likely to increase slightly as a result of the removal of the existing buildings, which serve to obstruct the wind. Any undesirable wind conditions during construction would be temporary and confined to the application site, which would not be open to the public.
318. Once constructed, some of the new buildings and landscape would affect the speed and direction of wind flows. The computer modelling shows that there would be a clear increase in the general windiness over the application site as a result of the proposed development, but in general, the wind environment would remain within the recommended Lawson Safety Criteria. However, there would be some areas where the safety criteria would be exceeded, particularly between the two tallest towers, at the corner of Ruby Street and Hyndman Street and on Sandgate Street.
319. Mitigation studies were carried out to improve the likely wind conditions and ensure pedestrian safety and comfort. These studies focused on introducing landscape features including trees and wind baffles arranged within the new park at the centre of the site. This would diffuse the wind arising from the south and south-western directions, whilst still allowing access for emergency vehicles. The results of the tests for both safety and comfort, prior to the proposed development, and following the proposed development (including mitigation measures) are shown in the figures below.



Figures 4 and 5 Pedestrian Safety Assessment: Existing (left) and proposed (right)





Figures 6 and 7 Pedestrian
Existing (left) and proposed

320. Whilst they establish the principle that the windiness could be reduced to a safe and comfortable level, the results of the submitted analysis do still show some very localised areas of windiness which will require further mitigation and additional testing. This will be carried out during detailed design, and evidence of the results will be required by a planning condition (include with landscape detailed design condition). This detailed testing will include assessing in detail the proposal to re use some steel structural elements from Gas Holder 12 as wind baffles, whilst also ensuring a landscape design that tells a coherent story about the industrial history of the area
321. The submitted ES states that assessment of the proposed development in a cumulative scenario, including other committed developments in the surrounding area, demonstrates that there would be no additional wind issues.

Noise and Vibration

322. Chapter 10 of the ES assesses the likely impacts of the proposed development on Noise and Vibration. The assessment is based on detailed environmental noise measurements undertaken at the site and predictive modelling of the future noise and vibration levels, particularly relating to the potential Bakerloo Line Extension.
323. The ES has been reviewed by the Council's Environmental Protection Team (EPT) who have recommended conditions to ensure that appropriate internal noise levels (in dwellings) are not exceeded due to environmental noise. These conditions are intended to address the following:
- Where potentially significant noise-generating commercial and/or community uses are directly below residents, there is reasonable resistance to the transmission of sound;
 - The sound level from any plant does not exceed the Background sound levels; and
 - Any deliveries or collections to the commercial units shall only be between the following hours: 08.00 to 20.00hrs on Monday to Saturday and 10.00 to 16.00hrs

on Sundays and Bank Holidays

324. Construction noise and vibration monitoring would be carried out in collaboration with the Council, with the levels to be agreed by the Council in advance. This would be secured through the Construction Environment Management Plan (CEMP) that would be required by the Section 106 Agreement.

Air Quality

325. The site lies within an Air Quality Management Area. This means the air quality is poor, with high levels of pollutants including particulate matter (PM10) and nitrogen dioxide (NO₂). 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.
326. The submitted ES and ES Addendum set out an assessment of the potential impacts of the proposed development on local air quality. The assessment found that construction activities would pose a high risk of dust impacts and a medium risk of increases in particulate matter concentrations. It also identified that through good site practice and the implementation of suitable mitigation measures, the effect of dust and PM10 releases would be significantly reduced. These will be secured through the CEMP required by the Section 106 Agreement. The ES concluded that the residual effects of dust and PM10 generated by construction activities on air quality would not be significant. The residual effects of emissions to air from construction vehicles and plant on local air quality were also not considered to be significant.
327. The submitted Air Quality Assessment also considers the impacts that the proposed development would have once construction is complete, particularly in relation to the impact from traffic emissions and the proposed energy centre. The pollutants considered are NO₂, PM10 and PM2.5. The assessment shows that impacts on air quality for existing and proposed receptors would be negligible and the residual effects would not be significant.
328. The following measures would be incorporated as part of the design and would be of benefit to local air quality:
- 20% of car parking spaces would have electric vehicle charging points;
 - There would be one cycle parking space per residential unit;
 - There would be a cycling hub, including space for a bike maintenance facility, cycle hire and cycle training;
 - Parking spaces would be for disabled residents only; and
 - NOX emissions for the proposed energy centre, CHP and boilers units would meet the London Guidance for Sustainable Design and Construction.
329. An Air Quality Neutral Assessment (which is required in London) was also undertaken. This shows that the proposed development would be compliant with the building and transport emissions benchmarks for NO_x and PM10. As such it would be air quality neutral.
330. The Council's EPT have reviewed the ES and raised no concerns or objections relating to air quality.

Transport issues

331. Saved Policy 5.2 of the Southwark Plan seeks to ensure that developments do not result

in adverse highway conditions; 5.3 requires the needs of pedestrians and cyclists to be considered and 5.6 establishes maximum parking standards.

332. Chapter 11 in the submitted ES and ES Addendum presents an assessment of the potential impacts of the proposed development on the local transport network. The risks identified during the construction phase include a temporary, minor risk of delays to pedestrians and cyclists as well as a minor risk of transport users feeling fearful or intimidated by the volume of Heavy Goods Vehicles (HGVs) associated with construction activities. This can be mitigated through the CEMP that will be secured by the Section 106 Agreement. Once construction is complete, the assessment concludes that potential impacts on the transport network are likely to be negligible in terms of delays to drivers, bus passengers and rail passengers. It is also noted that the proposed development would result in improvements to the pedestrian and cycle environments.
333. The Old Kent Road is managed by TfL as part of the Transport for London Road Network (TLRN). Sandgate, Ruby and Hyndman Streets are all LBS borough roads. The application site is approximately 0.8km south west of South Bermondsey Station, 3.2km south east of London Bridge Station and 4.8km south east of the City of London. The site's current Public Transport Accessibility Level (PTAL) is between 3 and 4, indicating 'moderate' to 'good' access to public transport. The Old Kent Road is a main arterial route (i.e. the A2) and comprises six lanes.
334. Members should note that the council is developing plans for changing the traffic management on Sandgate, Hyndman and Ruby Streets. The proposed development would not prevent those changes from being actioned, but would also work satisfactorily within the existing arrangements.

Access and trip generation

335. Vehicular access to the site would be from the surrounding streets and the central open space would be car free (with the exception of emergency vehicles). Automatic bollards would prevent vehicular access whilst allowing emergency access to the heart of the site. This would be secured by the Section 106 Agreement.
336. Each of the proposed blocks would have a self-contained car park. Block A, which would provide parking for the Enterprise car rental business and car club facility, would have a basement level car park, accessed by a two-way ramp. Blocks B and C would have car parks at ground level.
337. The proposed access arrangements are considered to be acceptable, and would enable all delivery vehicles to enter and exit the site in a forward gear, including fire engines and rigid HGVs of up to 12m length. All works to the highway would require Section 278 Agreement, and a clause to secure this would be included in the Section 106 Agreement.
338. Once occupied the estimated trip generation from the site would be as set out in Table 30. Please note that the trips generated by the re-provided Enterprise car rental business have not been included in this data.

Time Period	LGV	HGV	Total
08:00-09:00	9	3	12
17:00-18:00	14	0	14
18:00-19:00	14	1	15
Daily (07:00 – 19:00)	177	44	221

Table 30 Estimated Trip generation

Walking

339. The Pedestrian Environment Review System (PERS) audit and Bus Stop Audit submitted in support of the application demonstrate that the proposed development would improve the pedestrian experience. This would be achieved by improving pedestrian connections through the site, including access to the proposed sports hall and potential secondary school to the north. Improved pedestrian permeability would largely be delivered through the area of landscaping proposed within the site boundary.

Cycling

340. The Council is developing a cycle link from Ilderton Road to Rotherhithe New Road, running parallel to the Old Kent Road. The proposed development would not prevent the delivery of this. The proposed cycle hub is welcomed as it would contribute to increasing cycle mode share. The cycle hub would provide a multi functional space, including a workshop for cycle repairs, a cycle shop and showroom, cycle training services, a bike fitting studio and a food and coffee bar. A planning condition is recommended to require further details including detailed drawings. The Section 106 Agreement would secure three year membership to a licensed dockless cycle hire scheme for all residents or an equivalent, acceptable offer.

Public Transport

341. The site has convenient access to public bus services. The main bus routes running along the Old Kent Road connect the area to New Cross, Elephant and Castle, London Bridge, Waterloo and Kings Cross. There are bus stops immediately in front of the site, within a maximum distance of 150m from the entrances into the buildings.
342. Increased and improved bus services are needed to accommodate growth in the Old Kent Road Opportunity Area prior to the arrival of the Bakerloo Line Extension (BLE) and developers will be expected to fund adequate mitigation in advance of its delivery. LBS Officers are working with TfL to produce a phasing plan which will ensure this happens. LBS officers are therefore working with TfL to set out a strategy that is deliverable, transparent and can be seen by local people and developers alike to address concerns about bus capacity and overcrowding. Should a resolution to grant planning permission be agreed, once this strategy is complete and agreed by all parties, an appropriate financial contribution will be secured through the Section 106 Agreement.

Delivery and Servicing

343. A detailed waste management strategy has been submitted in support of the application. Refuse collection would be managed, with bins moved to collection points by a Facilities Management company. Residential bin stores would be located adjacent to each of the building cores and residents would carry their own refuse and recyclables to their local store. When full, these bins would be transferred to the main store, and replaced with empty bins. This would avoid the risk of the build up of bad odours. Bin stores in buildings B2 and C1 would be in excess of 10m from the parking location of the refuse collection vehicle, so operatives would be employed to transfer the bins to external presentation points on collection days. The bin presentation points have been designed to ensure that pedestrian movement along the footway would not be hindered on bin collection day.
344. In order to ensure that on-street servicing and deliveries do not negatively impact on the highway network, the applicant has agreed to enter into a Delivery Service Plan (DSP) Bond with the Council against submitted baseline figures for daily servicing and delivery

trips. These bonds would be calculated at £100 per residential unit and £100 per 500 sqm non-residential floorspace. The company responsible for the management of the proposed development would be expected to monitor daily vehicular activity (both commercial and residential), quarterly for a period of 2 years from 75% occupancy of each block. The DSP Bond would not include the trip generation of the Enterprise Car Hire as this could be deemed punitive to the economic survival of the re-provided business. The total bond has been calculated as set out in the table below:

	Quantum Proposed	Bond Amount
Residential units	1,152	£115,200.00
Non residential floorspace	10,837 sqm	£2,167.40
Total		£117,367.40

Table 31 DSP Bond Calculations

345. If the site meets or betters its own baseline target, the bond will be returned to the applicant 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 to the Council for sustainable transport projects in the ward of the development. The council will retain £1,600 per block for assessing the quarterly monitoring.
346. A draft Construction Management Plan has been submitted. In order to ensure that increases in traffic, noise and dust associated with the construction phase of the development are minimised, the Section 106 Agreement would secure a final draft, to be agreed with both TfL and Southwark Highway Authority once the developer has engaged a contractor.

Car Parking

347. The proposed development would be largely car free, but would provide 27 disabled parking bays for the residents of wheelchair accessible dwellings. Eight accessible parking spaces would be provided at basement level under Block A, with step-free access from the residential lobby at ground floor via two passenger lifts. Ten accessible parking spaces are proposed in the ground floor of Block B, with an internal step-free route to the lift cores. Nine accessible parking spaces are proposed in the ground floor of Block C, with internal step-free routes leading to both residential lobbies and lift cores.
348. The existing Enterprise car hire business would be re-provided as part of the proposed development, with the cars and vans housed in the basement car park under Block A. This would be accessed via a two way ramp from Sandgate Street. 43 car and van parking spaces are proposed for this business, which is considered proportionate. Two of these spaces would be used for a car club, membership of which would be offered to residents of the proposed development, secured through the Section 106 Agreement. The Section 106 Agreement would also ensure that no future residents or occupiers of the proposed development could obtain resident parking permits for any future CPZ.
349. 20% of the proposed car parking spaces would have electric vehicle charging points. This too would be secured through the Section 106.

Residential Cycle Parking

350. The innovative proposals relating to cycle parking are considered a positive aspect of this application. A total of 1,425 cycle parking spaces would be provided across the scheme. 1,168 cycle parking spaces for residents would be located in enclosed cycle stores at ground floor in Block A, within the basement under Block B and at mezzanine level in Block C. 30 cycle spaces would also be provided in the public realm for

residential short-stay.

351. At least 5% of the total cycle parking spaces would be easily accessible Sheffield stands, in line with the London Plan and London Cycling Design Standards. Accessible cycle parking for residents would be provided within the cycle stores in Blocks B2, C1 and C2. The needs of disabled residents would be monitored and additional spaces provided in the future if needed. This would be secured through the Section 106 legal Agreement. The approach to accessible cycle parking would be via oversized / goods lifts accessed at ground floor from the residential lobbies. The lifts would have internal cars of 1100mm width by 2100mm depth that are capable of accommodating adapted cycles and exceed the minimum dimensions required for passenger lifts.

Non-Residential Cycle Parking Provision

352. The proposed development would include non residential cycle parking for 83 long stay and 155 short stay across the site. The short stay visitor cycle parking is significantly higher than the minimum required (76). Most importantly the proposal includes a cycle hub at ground floor in Block C. The intention is not that this unit would become a cycle shop, but that it would provide a home for the cycling community, consisting of a multi functional space providing:

- a workshop for cycle repairs;
- a cycle shop and showroom;
- cycle training services;
- a bike fitting studio; and
- a food and coffee bar.

353. This facility would be secured through the Section 106 Agreement, and a condition requiring a detailed design of space is recommended.

Construction Impacts

354. Chapter 11 of the ES relates to transportation and access and concludes that during the demolition / construction phase there would be a short-term increase in traffic flow, particularly heavy goods vehicles (HGVs) associated with general plant and materials deliveries and the removal of waste from the site. A draft Construction Environment Management Plan (CEMP) has been submitted, which includes measures to manage this. As advised above, a final version of this will be secured through the Section 106 Agreement. The submission advises that the development would be registered under the Considerate Constructors Scheme.

Conclusion on Transport Issues

355. The proposed development would reduce car dependency, provide good quality pedestrian and cycle permeability and allow for emerging plans for the surrounding public highway to be delivered. Residential management proposals would reduce the impact of servicing and delivery. As such, it is considered that, in relation to transport issues, the proposed development should be supported.

Design issues

356. 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.

Site Layout

357. The proposed site layout would comprise three blocks (referred to as A, B and C) around a new park space of 3,792 sqm. The total amount of public realm at ground floor would be 4,301 sqm. The new park space would be for pedestrians and cyclists only, although there would be thoughtfully designed access for emergency vehicles. A new connection would be created through the proposed park space, from the Old Kent Road towards the site to the north, which has been identified for a future secondary school in the draft OKR AAP. Well designed breaks in the massing are proposed to ensure good levels of sunlight to the central space.
358. The ground floor layout would be outward-looking, with active frontages along Old Kent Road, Sandgate Street, Ruby Street as well as fronting the new park space. The Old Kent Road would be activated by new retail units, including a new convenience store and the re-provided Enterprise Car Hire business. The shop front design would contribute to the reinstatement of a high street character along the Old Kent Road and the convenience store would benefit from a dedicated servicing area from Sandgate Street. Fronting onto Ruby Street and Sandgate Street would be potential commercial and workshop spaces, interspersed with residential lobbies and car park entrances.
359. The re-provided Enterprise car hire business would be located in broadly the same location as it is found in today, but the car parking would be underground. This is considered positive, as it allows the business to continue operating with good street presence, whilst ensuring that the Old Kent Road frontage is not dominated by parked cars. The double height sports hall, the cycle hub and the proposed workspaces would front onto the new park, giving a visual identity to the emerging idea of creating a 'healthy Old Kent Road'.
360. During consultation, some concerns have been raised that the proposed sports hall would not present an active frontage onto the new park space as it would only be used at certain times and the windows could be obscured. Officers are however satisfied that that there is sufficient demand for this facility in the local area that it would be very well used (including by local schools) and that with careful design and attention to detail, it would provide a very successful frontage onto the new park. It would also provide an engaging representation of the aspiration to deliver a 'Healthy Old Kent Road'. As mentioned above, detailed design of the internal layout of the sports hall and gym facility would be required by planning condition, and the Section 106 Agreement would require it to be designed to LBS specification.
361. There would be one frontage to the rear of Block A that would be less active as it would enclose the ramped access to the basement car park. This lack of active frontage has been mitigated to a degree with a living green wall, and well articulated brick detailing. It is not considered that the lack of active frontage in this location would result in harm so substantial as to justify refusing planning permission.
362. The site layout allows for the development of the neighbouring retail warehouse and site to the rear as part of the comprehensive regeneration of the Old Kent Road Opportunity Area. This would be expected to complete the delivery of the central open space,

resulting in roughly double the area of new park proposed here. Expectations for this site would be guided by emerging policy in the draft OKR AAP.

7.5 Floor layouts (LB1 - L02)

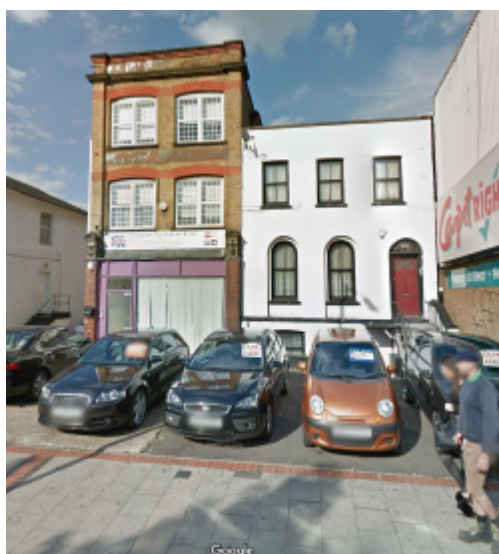
GROUND FLOOR LAYOUT



Figure 8 Ground floor layout showing proposed uses

Retained Buildings at 639 and 640 Old Kent Road

363. During the pre application process, the existing buildings at 639 and 641 Old Kent Road (see photographs below) were identified as being of townscape merit as traces of the history of the site and a reminder of what the Old Kent Road streetscape once was. Both are identified as buildings of townscape merit in the draft OKR AAP. The applicant was therefore asked to look into options for their retention.



Figures 9 and 10 Retained buildings at 639 and 641 Old Kent Road (left) and sketch showing proposed rooftop additions (right).

364. The proposed development would therefore retain these two buildings and extend them deeper into the site with a new circulation core and connected floor plates. As a result, a greater floor area would be opened up across the two buildings, offering further potential B1 (c) floor space. To the centre of the enlarged building would be an open courtyard that would allow good levels of natural light in.
365. One additional storey would be added to the number 639 and two additional storeys would be added to number 640. Following on going discussion with officers throughout the application process, a bold approach to the design and appearance of these additional storeys is proposed. The addition to 639 would be a calm metal box (possibly corten or powder coated metal), which would return into the site along the length of the existing building. Where this would be joined the rear extension to the existing building, it would take on the form of a contemporary saw-tooth roof, as has been commonly found on factory buildings in the past. This would achieve great quality north light on the upper floors of the building that would suit artists and makers particularly well. The rooftop addition to number 640 would be more expressive, picking up on the form of the existing butterfly roof and using that geometry to create a new feature that would appear to hover over the existing building.
366. The existing side elevation to number 639 would be largely retained as existing, with the simple addition of a new door opening at ground floor to increase accessibility, visibility and active frontages. The extension to the rear of this would be completed in a contemporary, but complimentary brick with fenestration details that pick up on the design proposals for the other proposed buildings. This would open up to the north to have a lighter elevation that offers views over the new park.
367. The design approach to these retained buildings is welcomed as a very positive aspect of the scheme. The expressive way in which it would adapt and re use these existing buildings is considered very successful, with the potential to become a very high quality addition to the OKR frontage. Design and material quality would be secured via planning conditions requiring detailed drawings and material samples.

Height, Scale and Massing

368. Block A, fronting onto the Old Kent Road, would be part 8 and part 15 residential storeys on top of the ground and mezzanine floors. The massing would be lowered to only ground and mezzanine floors to the rear of the block in response to the sensitive setting of the Grade II listed Canal Grove Cottages and to give a more 'human scale' to the entrance to the new park and the sports hall opposite.
369. Block B, fronting Sandgate Street, would be part 12 and part 45 residential storeys on top of the ground and first floor podium and second floor commercial uses. The massing would be reduced to two storeys adjacent to the listed Canal Grove Cottages in response to their heritage significance and in order to minimise impacts on daylight and sunlight. The tallest building in this block (B2) would be located furthest from the Old Kent Road. It would act as a marker signifying the presence of the new park and one half of a 'gateway' at the entrance to the site from the north.
370. Block C, fronting onto Ruby Street would be part 38, part 28 and part 10 residential storeys on top of ground and mezzanine floors. The tallest element would complement the tower in Block B, forming the other half of the gateway described above. The lowest element would sit between the two taller towers, acting as a ligament, breaking up the massing and allowing sunlight and daylight into the site and views out of the buildings. The second tall element would be subservient to the tallest towers, but would still act as an important anchor on the corner of Ruby Street and Hyndman Street.
371. The heights proposed would result in a well articulated composition of a three stepping

buildings defining the new park. They would step away from the Old Kent Road in response to the existing lower context. The design of the tall buildings is described in detail below, but essentially they would be of high architectural quality thanks to strong vertical emphasis, well defined bases, middles and tops and well considered fenestration and detailing that would lengthen the buildings as they get higher to both reduce the perception of scale and ensure the buildings lighten towards the top.



Figure 11 Visualisation across Old Kent Road looking north

372. The height of the buildings proposed marks a step change in the scale of development in the area. The massing strategy is however in line with the emerging policy set out in the draft AAP (acknowledging the very limited weight of that document), which states that the tallest “tier 1” buildings should be at the locations of greatest, city wide importance, including sites “adjacent to the largest new open spaces, like that proposed in Ruby Triangle”. 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, it is considered that the Old Kent Road Opportunity Area is, in principle, an acceptable 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 Policy 7.7, which are as follows:

- Generally be limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport;

- Only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building;
- Relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level;
- Individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London;
- Incorporate the highest standards of architecture and materials, including sustainable design and construction practices;
- Have ground floor activities that provide a positive relationship to the surrounding streets;
- Contribute to improving the permeability of the site and wider area, where possible;
- Incorporate publicly accessible areas on the upper floors, where appropriate;
- Make a significant contribution to local regeneration;
- Not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference; and
- Not impact on local or strategic views adversely

373. It also states that the impact of tall buildings proposed in sensitive locations, including the settings of conservation areas and listed buildings should be given particular consideration.

374. The character of the area would not be adversely affected by the scale, mass or bulk of the tall buildings proposed because it is not generally considered sensitive to change of this type. The nearest conservation area is at least 340m from the site. There is a terrace of Grade II listed buildings in the immediate vicinity of the site (the Canal Grove Cottages), but their existing setting, beyond the mature trees that screen them from their industrial neighbours, is considered to detract from their heritage significance rather than contribute to it. The proposed development would be of very high quality architectural and urban design, and would therefore enhance the setting of these heritage assets. The specific impact of the proposed development on the townscape of the area is assessed in more detail in paragraphs 439 - 492 below, where the submitted Townscape and Visual Impact Analysis (TVIA) is considered.

375. It is considered that the proposals would relate well to their surroundings, particularly at street level, with active frontages as described above and retail uses proposed to reintroduce the high street character of the Old Kent Road itself. The public realm proposals would respond well to the existing streets, repairing and reinforcing the existing street grain but also contribute to improving permeability by introducing new links through the site. The robust masonry design would respond well to best of the existing local character, particularly the industrial brick buildings and undesignated heritage assets like the Royal London Buildings on the other side of the Old Kent Road.

376. As a group, the proposed tall buildings would mark the presence of the new park and public sports hall within the development and the potential secondary school to the north. As a result of this cluster of community spaces, it is likely that the proposed development would become a focus of activity for both existing and new communities and, as a result become a point of civic significance. It is considered appropriate, and in line with the requirements of London Plan Policy 7.7 therefore, for this to be marked on the skyline in order to improve the legibility of the area. The design proposed would enhance the skyline and image of London with the three tallest buildings forming a well considered composition of varying heights, each with a strong vertical articulation and characterful top creating a visually interesting silhouette.

377. As described in paragraphs 385 - 397 below, it is considered that the proposals demonstrate the highest standards of architectural design and incorporate the highest quality materials. In order to secure this design quality, planning condition requiring detailed drawings, material samples and full scale mock ups are recommended. It is also clear from the submitted energy and sustainability strategies that the proposals would incorporate high quality sustainable design (see paragraphs 510 - 523 of this report) and the draft CEMP demonstrates commitment to excellent construction practices.
378. The proposed development would not incorporate any publicly accessible areas on the upper floors, as the applicant was advised at their initial Secure by Design meetings that this would not be appropriate. It is noted however, that the London Plan (2016) only requires this "where appropriate". A number of communal terraces for the new residents would be introduced, giving a soft, green layer of articulation to the appearance of the buildings.
379. The contribution that the scheme would make to local regeneration would be very significant. As has already been identified throughout this report, this would include the provision of significant contribution to the borough's housing stock, including affordable housing; a significant increase in jobs and new, flexible work spaces; the delivery of a new public sports hall and gym facility; and the creation of a generous new park space.
380. The impact of the proposed development on microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference is all assessed in the submitted ES and presented elsewhere in this report. In each case it is concluded that there would be no significant adverse impacts.
381. Finally, it is also considered that there would be no unjustifiably harmful impact on local or strategic views, although as identified in paragraphs 491 - 492, there would be a small number of sensitive locations from which this needs a carefully balanced view.
382. 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.
383. The proposed development would make a very positive contribution to the landscape through the new park space proposed at the centre of the site and the enhancements proposed to the surrounding streets, including wider footways and a public realm set piece outside the potential new secondary school. Although the application site is not currently a point of landmark significance, it is considered that the cluster of health and community uses proposed would give it a civic importance once constructed. It would also be within the designated opportunity area and would optimise the development capacity of the site without harming the character of the surrounding area.
384. As set out below, the proposed development would be of a high architectural standard and would significantly enhance its surroundings particularly at street level. It would also contribute positively to the London skyline, initially providing a key focus within views

from the surrounding area, and eventually as part of a cluster following the regeneration of the area.

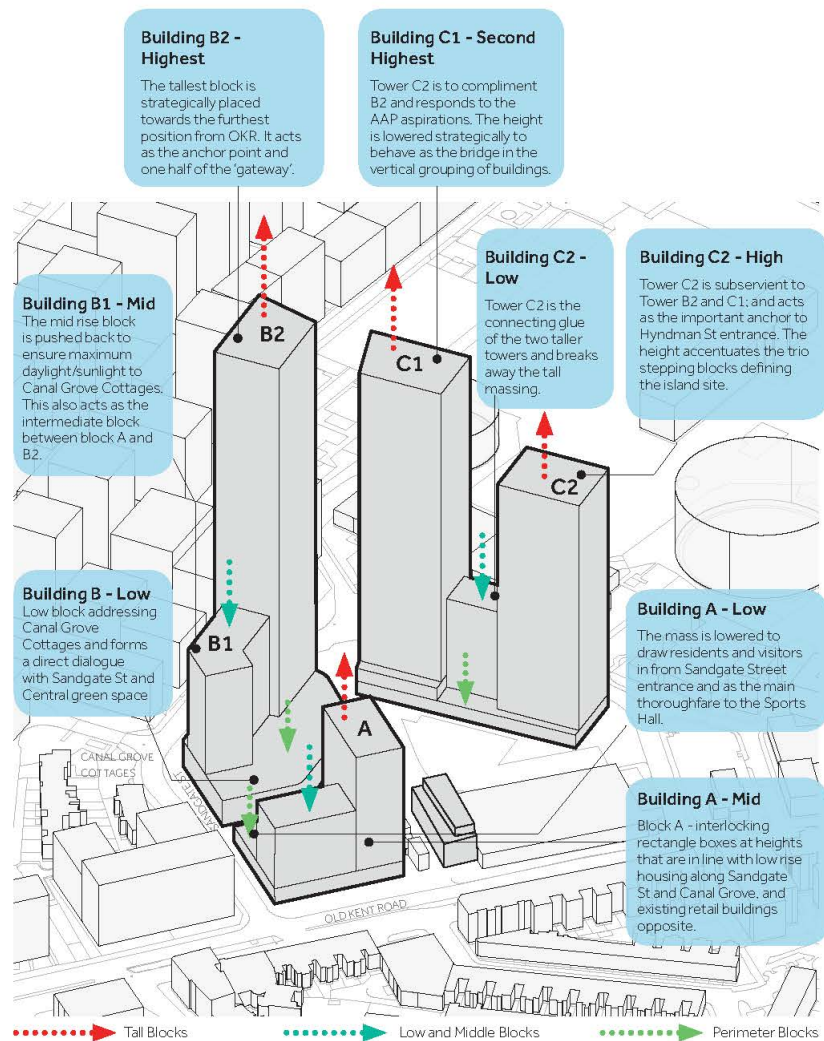


Figure 12 Height and Massing principles (extract from submitted DAS)

Architectural Design and Materiality

385. The proposed buildings would be of masonry character, referencing the solidity and robustness of the best of the existing architecture found in the area. Terracotta and plaster details are proposed to echo those found in the Grade II listed Camberwell Public Library and Livesey Museum and the Royal London Buildings, which are identified as being of townscape merit in the draft OKR AAP. The elevational strategy for the development would also create a common masonry language across the site, but as the buildings get taller, they would also get lighter in appearance with the incorporation of terracotta, Glass Reinforced Concrete (GRC) and metal.
386. The lowest buildings on the site, A and B1 would be of the most traditional appearance. They would be clad in brick with punched windows of a full brick length in depth. Their bases, middles and tops would be well defined through a combination of string courses, variations in bay widths and the form and treatment of windows, including their vertical groupings. This would reflect the uses found within. Their façades would have a vertical emphasis, with vertical pilasters coming strongly to the ground. There would be a mixture of inset and open balconies, finely detailed façade modelling and open, framed

corners.

387. The tops of these buildings would be articulated through elongated window groupings, a finer grained grouping of pilasters and a strong horizontal cornice line, with subtle dentil detailing.
388. Along the Old Kent Road frontage, although the shop fronts would be taller than the older shop fronts elsewhere in the Opportunity Area, their rhythm, proportion and detailing would respond to the best of the existing high street character. They would be defined by strong brick pilasters coming to ground and deep, lighter, contrasting terracotta or stone reveals. Modern interpretations of traditional cornices and corbel details would be incorporated in the detailing.



Figure 13 Visualisation from Old Kent Road, near the junction with Sandgate Street

389. Building C2, would be clad in brick with punched windows and deep reveals, but would have a slightly lighter, more contemporary appearance than the lower buildings A and B1. The base, middle and top would be defined by a combination of expressive brick details, variations in bay widths and the form, treatment and grouping of the windows. The facades would have a vertical emphasis defined by strong brick pilasters that would come to ground and articulate the sky line at roof level. The windows would be grouped over two floors (as in buildings A and B1) at lower levels, three floors above a mid-level point and five floors at the top of the building. There would be a mixture of inset and projecting balconies.
390. The top of the building would be well articulated, with the brick pilasters breaking through the parapet level and folding over the top of the building. The cornice lines would be recessed between the pilasters with a fine vertical texture to the brickwork. This would create a characterful top and contribute well to the skyline.
391. The base would be defined by stone facings and deep reveals, defined by the primary vertical pilasters that would come all the way to ground.

392. The tallest towers, buildings B2 and C1, would be of the lightest appearance. Like the other buildings, they too would have strong vertical articulation. In these buildings this would be defined by vertical fins expressed for the entire heights of the buildings, dividing them into single glazing bays. In order to further strengthen the vertical emphasis and disaggregate the overall mass of the towers, each elevation would have a central bay where one fin would be omitted, resulting in a double-bay. The fins would recede towards the tops of the buildings, but they would continue beyond the final floor to create an articulated and characterful skyline with reference to building C2. At the very top, recessed screens would give a contrasting back drop to the fins, whilst enclosing the roof plant areas. The fins would be clad in a material with a lighter tone than the red brick used elsewhere. Terracotta, GRC and metal are all being explored, and would be agreed with Officers in order to discharge planning conditions requiring detailed drawings and material samples.
393. As they get taller, the windows in these tallest buildings would be arranged in progressively larger vertical groupings. Towards the bottom of each tower, the windows would be grouped in vertical pairs, and this would increase up the height of the buildings, culminating in groups of five at the tops. The corners of the towers would be glazed to help the buildings turn the corners and to contrast with the central recessed balcony element. The glazing bays would be surrounded by a cream coloured metal frame defining the double and triple height bays. Their expression would be further strengthened with a dark recess either side.
394. The vertical fins would come to ground, with residential entrances and non residential uses set between them. Contrasting stone facings and deep reveals would define the base of the towers and give character to the ground floor.



Figure 14 View of Ruby Triangle public space and tower residential entrances.

395. The proposed sports hall in the lower levels of Block B would front onto the new park. The façade would be composed of repeating vertical elements that would relate to the internal arrangements of the space and the structural requirements of a double height

sports hall. These vertical elements would also act as a screen to the sun whilst allowing views in and out. Corten steel is proposed to clad these vertical elements, in response to the industrial heritage of the area and the proposals to incorporate gas holder steels into the landscape (see paragraphs 398 - 407 of this report for more detail on landscaping proposals).

Materials

396. A very high quality material palette is proposed across the development. Whilst each building would differ in the ways described above, there would also be a strong sense of commonality between them, largely derived from the materials proposed:

- Brick cladding and detailing;
- Metal framed windows;
- Metal balustrades and balcony framing;
- Glass balustrades and glazed screens to balconies;
- Metal panelling and ventilation louvres;
- Terracotta / reconstituted stone facings;
- Glazed shop fronts;
- Corten steel facing panels;
- Terracotta / PC metal / GRC facings; and
- Metal / opaque glass plant screens.

397. The predominantly masonry texture proposed would respond well to the best of the existing buildings in the area, including those to be retained on the site and those facing the site on the other side of the Old Kent Road. The quality of these materials would be assured by planning conditions requiring detailed design drawings and samples of all facing materials. The Section 106 Agreement would also include a clause requiring the current architect (Farrell's) to be retained to complete the detailed design and construction phases of the project unless otherwise agreed in writing.

Landscaping

398. The proposed development would provide 4,301 sqm of public realm, including a new park of 3,792 sqm. The new park would include a large area of lawn of 1333 sqm. The site layout would allow for the long term aspiration of the draft OKR AAP to provide a new park of approximately double this size in this area. The proposed park and public realm would be publicly accessible at all times, which will be secured through the Section 106 Agreement.

399. The public realm would respond well to the activities planned for the ground floor of the proposed development. There would be a strong focus on health and wellbeing, driven by the proposed public sports hall and gym facility and its relationship with the new park. In this spirit, large areas of flexible lawned areas would be available for play, exercise and recreation. Running and walking routes of set distances would also be set out and there would be opportunities for signage and local information within the sports hall.

400. The arrangement of the proposed buildings would ensure that 99.8% the new park would receive direct sunlight more than 2 hours a day on March 21st each year and 99.9% would receive direct sunlight for 2 hours or more on 21st June each year. The landscape proposals would also accommodate measures to mitigate harmful wind speeds in order to ensure pedestrian comfort. Three mature trees of 10-12m in height would be planted in the new park. These would not only mitigate wind speeds, but also contribute to the character of the proposed development, provide natural structure that will develop over time and support natural habitats and biodiversity. The industrial heritage of the area would be incorporated through the re-use of retained elements of one of the recently demolished Gas Holders from the neighbouring gas works site. The

exact location and arrangement of these components will be developed further at the detailed design stages of the project. This will be controlled by a planning condition requiring detailed drawings of landscape proposals. The Section 106 Agreement will ensure that the gas holder structures are well maintained and remain on the application site unless otherwise agreed in writing.

401. The public realm and streetscape would be fully accessible, and would provide level thresholds between internal and external spaces and across the public realm. There would be no steps or ramps within the new park, and any gradients would be no steeper than 1:25 (in line with building regulations). A substantial number of new street trees are proposed and will be secured through the Section 278 Legal Agreements with TfL and LBS.
402. The streets surrounding the whole site would be widened to provide an improved street scape and an appropriate setting for increased numbers of people using the area. The minimum street width would be 2.4m in line with the Southwark Street Design Manual.
403. The hard landscape material palette would consist of a simple range of natural materials which would be robust and complementary to the industrial heritage of the area. This would include:
 - Natural Stone paving to surrounding streets;
 - Natural Stone cobbles and resin bound gravel within the new park; and
 - Natural Stone seating with hardwood inserts.
404. As mentioned above the details of the landscape proposals would be secured by planning conditions. This is in accordance with the recommendation of the Council's Urban Forester who responded to consultation that:
405. "The inclusion of trees in the central green open space that are in proportion to the scale of the development is welcome. Elsewhere, sufficient footway widths and public realm allow for appropriate soft landscaping. Green links are further enhanced by planting of street trees, roof terraces and green roofs. The overall layout of soft and hard spaces together with the outline materials and species palette are acceptable and of design merit.
406. However, the recommendation to only plant exclusively native species described in the ecology report is not necessary due to the need to ensure successful establishment of species suitable to the site. This can be controlled via a landscape condition.
407. A separate tree planting condition is also necessary to ensure street trees are provided as proposed. This is especially important given the scale of development, poor air quality and foreseeable problems in agreeing planting on TfL footways."



Figure 15 Landscape proposals showing public realm and communal amenity terraces

Design Review Panel

408. The applicants presented a relatively early version of their proposals to the Southwark Design Review Plan on 15 January 2018, with the report received on 2 February 2018. The Panel raised a number of concerns relating to urban rationale, public realm, technical justification and quality of design. The comments the Panel made, and the changes proposed to the scheme in response are summarised below.
409. Whilst the Panel noted that the draft OKR AAP identifies areas of higher density around key nodes, they questioned whether this justifies buildings of the scale proposed, and whether the site was able to accommodate buildings of this scale. They noted that a key justification for buildings of scale is that they should deliver key public benefits and exemplary design. The panel questioned whether either of these is being met with the current design.
410. Officer Response: The scheme delivers significant regeneration benefits, including a substantial contribution to the borough's housing stock, including affordable housing, a significant uplift in the number of jobs on the site, the creation of high quality, flexible workspace, a new public sports hall and gym and a new park. It is considered that the heights proposed are proportionate to these benefits to the area, and that the site is able to accommodate them.
411. The Panel stressed the importance of the existing streets, spaces and places immediately around the site which will remain the main ways to access and appreciate this site both in the shorter and longer term.

412. Officer Response: The ways in which the scheme addresses the surrounding streets was revised during pre application discussions in order to achieve successful active frontages.
413. The Panel felt that a proposal which includes two substantial towers should be accompanied by exceptional quality of design and urban design. In order to demonstrate this, the Panel requested a detailed and thorough urban rationale for the proposed urban form and heights.
414. Officer Response: The material submitted in support of the application demonstrates that the towers would be of exceptional design quality. This material was not available at the time of the DRP as the design was still evolving.
415. The Panel highlighted the contribution of the public realm to any scheme that includes tall buildings. The Panel raised substantial issues over the quality of the quality and generosity of the public realm and asked the Applicants to develop this further and to demonstrate with plans and cross sections how these important public spaces will be used and experienced.
416. Officer Response: The quantum of public realm offered (3,792sqm new park set within a total public realm offer of 4,301sqm) is considered generous. The design of the space has developed significantly since the DRP. More detail on the proposed landscape is set out in paragraphs 398 - 407 of this report.
417. When they considered the approach to the two existing retained buildings, the Panel felt they added charm and interest to the proposal. They should be considered, not only in the context of the elevation of Old Kent Road frontage, but also as an integral part of the public realm in and around the site.
418. Officer Response: The retained buildings have been considered in this context, as described in paragraphs 363 – 367 above.
419. In respect of the ground floor uses, the Panel questioned the fragmented nature of the design and the distribution of the commercial uses. They felt the arrangement and distribution of 'artist' studio space felt like an afterthought and could struggle for suitable occupants if it is not consolidated in one location, is bright and airy, and demonstrates that it responds to the needs of the end-users. They asked for a robust and convincing strategy for the marketing and use of this space as well as more information about its detailed design to better understand how it will relate to the street scape and the public realm;
420. Officer Response: The design of the ground floor has been significantly revised since the DRP and is now much less fragmented. The quantity and clustering of workspace has also improved and more detail has been provided. A marketing strategy for all commercial uses will be required by the Section 106 Legal Agreement.
421. The Panel did not accept the architect's assertion that the sports hall would animate the public space – the combination of the need for rebound screen and the requirements for safeguarding will lead to views in and out of the sports hall being obstructed
422. Officer Response: This concern has been carefully considered, and it is felt that, with careful design and attention to detail, the sports hall would provide a very successful frontage onto the new park, and along with the cycle hub would give a sense of identity to this space based around activity and healthy living. As mentioned above, detailed drawings of the internal layout of the sports hall and gym facility would be required by planning condition.

423. The Panel commented on the predominance of car parking and service spaces on the ground floor facing both the street and the open space which, together with the sports hall, could present large expanses of inactive frontage, affecting the quality of the public realm.
424. Officer Response: Since the DRP, the proposed basement has been enlarged to accommodate more of these 'back of house' functions and enable more active frontage to be created. Whilst there is still ground floor car parking in Blocks B and C, this is a relatively small proportion of the frontage and the architectural design mitigates for any harmful impact this could have on the pedestrian experience.
425. The Panel asked the applicants to ensure that studies into the sunlight/daylight and wind and micro-climate impact of the proposal both on existing and future occupiers as well as the public realm are prepared and presented to them.
426. Officer Response: Although it was not possible for these studies to be presented to the DRP, they have been completed and can be found in the following chapters of the ES:
427.
 - Sunlight/daylight: Chapter 17
 - Wind and micro-climate: Chapter 18
428. In terms of the detailed architectural design the Panel were not able to endorse the proposal. They raised significant concerns over the initial design for the block on the Old Kent Road. As a key building on the Old Kent Road the proposed design lacked distinction and composition to demonstrate how it has responded to its context. This is especially evident in the large blank flank at the prominent corner with Sandgate Street. They were not able to comment on the design of the linear blocks on Sandgate Street and Ruby Street because these were not presented in detail. The presentation included very little information about the detailed design of the towers, their materiality, plan-form or architectural composition.
429. Officer Response: The detailed design of the scheme has improved significantly since the DRP, in close consultation with officers. The resultant quality of design is considered to be very high. The level of detail submitted is also considered very thorough and planning conditions recommended requiring even further levels of detail to be agreed.
430. The Panel also raised significant concerns over the quality of the accommodation and in particular the predominance of single-aspect units and the unacceptably high level of single-aspect north facing units. They asked the architects to present the detailed flat layouts and to demonstrate how they will meet and exceed the minimum Residential Design Standards.
431. Officer Response: As set out in paragraphs 239 - 263 of this report, there are areas of the residential design that do not meet expected standards, including the number of single aspect units. Members are advised however, that a balanced judgement is required in relation to this, as there are also areas in which residential design standards are exceeded. Where standards are not met, the design mitigates against any potential harm.
432. The Panel challenged the applicant to address their concerns return to the DRP in advance of submitting a planning application. As set out above, the applicant has addressed the majority of these concerns, but unfortunately did not return to the DRP. Officers are satisfied however, that where appropriate, the issues raised by the DRP have been addressed and the design of the scheme is of a high quality.

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

433. 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 should be conserved. Saved Policy 3.15, Conservation of the Historic Environment of the Southwark Plan 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. This is reiterated in the draft NSP and OKR AAP.
434. The application site does not sit in a conservation area and it contains no listed buildings. The nearest designated heritage assets are the Grade II Listed Canal Grove Cottages and Grade II Listed gas lamp to the north west of the application site. The cottages date from the first half of the nineteenth century and provide an important reminder of the area's working heritage through their historical association with the South Metropolitan Gas Company. The buildings and structures on the application site share no historical relationship with these listed buildings and are not considered to contribute positively to their setting.
435. Also within the area surrounding the application site are the following Grade II listed buildings and structures:
- Gasholder No. 13;
 - Camberwell Public Library and Livesey Museum;
 - Statue of George Livesey;
 - Mural at the Civic Centre;
 - The Kentish Drovers Public House;
 - 12-14 Asylum Road; and
 - Numbers 1-50 Clifton Crescent.
436. There are no conservation areas in the immediate vicinity of the site, but Coburg Road, Trafalgar Avenue, Glengall Road and Caroline Gardens Conservation Areas are all within 1km of the application site, and could therefore be impacted upon.
437. 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 following buildings, each within 250m of the application site, are identified as such.

Property	Description
Nos. 639 and 641 Old Kent Road	Building or Feature of Townscape Merit
Christ Church	Building of Architectural or Historic Interest
644-672 (evens) Old Kent Road	Building or Feature of Townscape Merit
610-636 (evens) Old Kent Road	Building or Feature of Townscape Merit

438. Chapter 14 of the submitted ES considers the impact of the proposals on the cultural heritage of the surrounding area. It concludes that although the proposed development would not affect the fabric of the designated or undesignated heritage assets, the heights of the buildings would result in considerable change in the townscape of the area

and could impact on their settings. The impact of this is discussed in greater detail in response to the submitted Townscape and Visual Impact Analysis (TVIA) in paragraphs 439 – 492 below. In summary, and on balance, it is considered that the replacement of the poor quality townscape that currently occupies the application site would enhance the settings of these heritage assets. The high quality detailed design of the proposed development would respond well to the best of the local architecture and material palettes and the proposed site layout would enhance the local townscape by introducing new public space and improving the permeability of the site.

Townscape and Visual Impact Analysis (TVIA)

439. A Townscape and Visual Impact Analysis is set out in Chapter 16 of the ES. It reports on the impact of the proposed development on 35 views from the surrounding area. The views were selected in consultation with Officers in order to ensure the most sensitive views were tested.

View 1 – Old Kent Road/ Ossory Road

440. This view is from the Old Kent Road junction with Ossory Road, looking south east. It is generally of low heritage and townscape significance, but is useful to show how the proposed development would impact on the local context. The proposed development would appear to the left in the middle distance, with a visually interesting composition, stepping down in height. The elevational strategy proposed would ensure a sense of commonality, but avoid visual coalescence. The vertical emphasis of the taller buildings would result in elegant proportions, and a strong landmark presence. Considered cumulatively with other proposed development in this area, the submission shows that the Malt Street scheme (17/AP/ 2773 - yet to be determined) would also be visible to the right in this view, resulting in a balanced composition across the Old Kent Road

Views 2, 3 and 4 - From Nile Terrace, Cobourg Road and Cobourg Road Towards Former Church of St. Mark

441. These views are either located within the Trafalgar Avenue or Cobourg Road Conservation Areas, or look into the Conservation Areas. They are therefore of relatively high heritage and townscape importance. In each of the views however, the proposed development would be completely obscured by existing buildings and would therefore have no impact.

View 5 – Burgess Park Lake

442. This view is from the edge of the lake in Burgess Park, looking into the Cobourg Road Conservation Area, including some listed buildings, from some distance. It is therefore of some heritage and townscape importance.
443. The proposed development would be visible in the background of this view. It would form a new distinct layer of townscape and skyline; clearly separate from the park in the foreground and other lower scale buildings (including those within the Cobourg Conservation Area) in the middle distance. The proposed composition would be visually interesting, with height stepping down away from the viewer. The elevational strategy and distinctive building tops proposed would ensure a sense of commonality, but avoid visual coalescence. The vertical emphasis of the taller buildings would result in elegant proportions, and a strong landmark presence. Considered cumulatively, the Malt Street scheme would also be visible in the middle distance of this view, adding to the new distinctive townscape layer and skyline.
444. Historic England (HE) considers that the impact of the proposed development in this view would undermine the attractive and picturesque qualities of the Cobourg Road

Conservation Area and Grade II listed houses in views from Burgess Park. Officers do not agree with this assessment given the distance of the viewing point from the Conservation Area and Listed Buildings, and the substantial tree coverage screening many of the heritage assets. Members are advised to balance any potential harm caused against the wider regeneration benefits of the proposal.



Figure 16 View 5 – Burgess Park Lake

Views 6 and 7 – Burgess Park

445. These views are from Burgess Park, on important routes through the open space. The proposed development would appear in the middle distance, at the end of the routes through the park, forming a focal point on the skyline. As above, it would form a new, distinct layer of townscape and skyline. It would have a visually interesting composition, with buildings stepping down in height. The elevational strategy proposed would ensure a sense of commonality, but avoid visual coalescence. The vertical emphasis of the taller buildings would result in elegant proportions, and a strong landmark presence at this focal point. Considered cumulatively, in both views the Malt Street scheme would be visible in front of the proposed development, thus heightening the impacts described above. As the proposed development would improve the legibility of the skyline at these key routes through the park, it could be considered beneficial.

View 8 – Glengall Terrace

446. This view is from Glengall Terrace, within the Glengall Road Conservation Area. Most of the houses in the view are Grade II listed. As such it is relatively high sensitivity in terms of heritage and townscape. The proposed development would appear behind the houses on Glengall Road, as a background element within the view. The composition would be visually interesting, with height stepping down towards the centre of the view. The buildings would be of high architectural quality, with strong vertical articulation, distinct tops and an elevational strategy that would avoid visual coalescence. Considered cumulatively, the Malt Street scheme would appear closer to the viewpoint.
447. HE considers that the proposed development would break the unobstructed roofline at the corner of Glengall Road and Glengall Terrace which would detract from the historic streetscape and cause less than substantial harm to both the Conservation Area and the setting of these Grade II listed houses.

448. The appearance of modern tall elements in the background of this relatively coherent historic townscape would, on balance, have an adverse visual impact. Officers agree with HE that the harm caused would be less than substantial and are satisfied that this harm would not undermine the heritage significance of the conservation area and that it would be outweighed by the wider regeneration benefits of the proposals.



Figure 17 View 8 – Glengall Terrace

View 10 - Goldsmith Road/ Friary Road

449. This view is from the junction of Goldsmith Road and Friary Road. Both sides of Friary Road are lined by two storey historic terraces creating a considerable degree of coherence. Those on the east are Grade II listed. There is a school building in the middle distance. The view is of relatively high townscape sensitivity. The tallest parts of the proposed development would appear behind the houses on the eastern side of Friary Road, breaking the consistent roofline. They would be screened to some extent by tree branches in winter view, and partially obscured by foliage in summer.
450. The proposed development would be read as a background layer to one side of the view, distinct from the listed houses in the foreground of the view. They would be of very high architectural quality, with well ordered, vertically proportioned elevations, distinctive tops on the skyline and an elevational strategy that would avoid visual coalescence. Considered cumulatively, the Malt Street scheme would be barely visible.
451. The appearance of modern tall elements in the background of this relatively coherent historic townscape would, on balance, have an adverse visual impact. Officers consider that the harm caused would be less than substantial and are satisfied that it would not undermine the heritage significance of the conservation area and that it would be outweighed by the wider regeneration benefits of the proposals.



Figure 18 View 10 – Goldsmith Road / Friary Road

View 11 - Bird in Bush Road / Friary Road

452. This view is from the corner of Bird in Bush Road/ Friary Road. It is of low heritage and townscape sensitivity. The tallest parts of the proposed development would be visible behind the Friary Estate blocks. It would read as a distinct composition of high architectural quality in the middle distance. The impact is not considered harmful. There would be no cumulative schemes visible in this view.

View 12 - Caroline Gardens

453. This view is from Caroline Gardens, off Asylum Road. It is within the Caroline Gardens Conservation Area. The focus of the view is the Grade II listed Almshouses, central courtyard and mature trees. This specific viewpoint was chosen as it takes in both the central portico and the wider Almshouse complex. The 14 storey blocks of the Ledbury Estate are visible in the background. The proposed development would be visible to the far right of the view. It would be partially screened by tree branches in winter, and largely obscured from sight by foliage in summer. It is however important to note that there would be other points around the square, particularly to the west (left), from where the proposed development would be less hidden by trees.
454. The proposed development would be read as the same background layer of townscape as the Ledbury Estate buildings. This layer is clearly distinct from the heritage assets in the foreground of the view. The addition to this layer of townscape would be of very high architectural quality, and therefore has the potential to improve the view. Considered cumulatively, the Malt Street scheme would appear to the left, directly behind the listed former Almshouses. Given the high architectural quality anticipated for the Malt Street scheme, it is considered that the cumulative impact would not be harmful.
455. HE considers that the proposed development, although peripheral to important views, would exacerbate the impact presented by the existing tower blocks and further detract from the formal orthogonal plan and enclosed setting of Caroline Gardens. In HE's view, this would cause some less than substantial harm to the character of the Conservation Area and the setting of the Grade II listed almshouse buildings. Southwark Officers do not agree with this assessment and consider that the proposed development would be so peripheral as to not cause any harm.

456. Members must be satisfied that the appearance of modern tall elements in the background of this coherent and sensitive historic townscape would either result in an enhancement, or that any harm that would be caused would be outweighed by the other positive elements of the proposals described elsewhere in this report.



Figure 19 View 12 – Caroline Gardens

View 13 - Asylum Road

457. This view is from Asylum Road, opposite the junction with Studholme Street. Amongst the mix of building styles in this view are the Grade II listed Nos. 12 and 14 Asylum Road. The Grade II listed Office to the Licensed Victuallers Almshouses and Grade II listed South Lodge to Licensed Victuallers Benevolent Institution are also visible to the north. As a result, this view is of some heritage sensitivity. The proposed development would be seen in the middle distance, screened by tree branches to a significant extent in the winter and would be almost completely obscured by foliage in summer. It would not be seen in direct relation to the listed buildings described above (from this viewing position). It is therefore not considered to result in any harm. There would be no cumulative schemes visible in this view.

View 14 - Clifton Crescent/ Brimmington Park

458. This view looks over Brimmington Park to the Grade II listed buildings of Clifton Crescent. Clifton Crescent forms a high quality, coherent piece of historic townscape, although the towers of the Tustin Estate appear above the roofscape in the middle distance. The view is therefore of relatively high significance. The tallest parts of the proposed development would be visible in the middle distance to the left of the view. The extent of their visibility would be far less than that of the Tustin Estate towers and given the high architectural quality proposed, Officers consider that they could enhance this view. As such, it is not considered that there would be any harm. Considered cumulatively, a small part of the Malt Street scheme would be visible at the far left edge of the view.
459. Members must be satisfied that the appearance of modern tall elements in the background of this sensitive historic townscape would either result in an enhancement to the view, or that any harm that would be caused would be outweighed by the other positive elements of the proposals described elsewhere in this report. HE has raised no concerns in relation to this view.



Figure 20 View 14 – Clifton Crescent / Brimington Park

View 15 – Old Kent Road, Opposite Sylvan Grove

460. This view is from Old Kent Road, opposite the junction with Sylvan Grove. It is of low heritage and townscape sensitivity, but is useful to show how the proposed development would impact on the local context. The proposed development would appear to the right in the middle distance, with a visually interesting composition, stepping down up in height. The elevational strategy proposed would avoid visual coalescence. The vertical emphasis of the taller buildings would result in elegant proportions, and a strong landmark presence. The impact is therefore considered beneficial. Considered cumulatively, only a small part of the Malt Street scheme would appear behind the Ledbury Estate towers, screened to a large extent by trees. It would not have a significant visual presence in this view.

View 16 - Hunsdon Road

461. This view is from Hunsdon Road in the Hatcham Conservation Area in the London Borough of Lewisham. The Grade II listed Gasholder No. 13 near the site appears in the distance. The view is of relatively high heritage sensitivity. The proposed development would be seen in the background of the view, behind the houses and broadly on axis with Hunsdon Road. As such, it would form a high quality focal point within this view. Considered cumulatively, the uppermost parts of the Malt Street scheme would be visible to the left in this view, screened to some extent by trees
462. The appearance of modern tall elements in the background of this relatively coherent historic townscape would, on balance, have a minor adverse visual impact. Officers consider that the harm caused would be less than substantial and are satisfied that this harm would not undermine the heritage significance of the conservation area and that it would be outweighed by the wider regeneration benefits of the proposals. HE has raised no concern with this view.



Figure 21 View 16 – Hunsdon Road

View 17 – Bridge House Meadows

463. This view from Bridge House Meadows in Lewisham. It is of low heritage or townscape sensitivity. The proposed development would be very visible in the background of the view. The unlisted gas holder that is obscured in the view as submitted has since been demolished. The Grade II listed gas holder would remain visible and would form a central focal point within the panorama. Given the low sensitivity of this view, it is not considered that the impact would be harmful. Considered cumulatively, the Malt street scheme would also be visible, forming part of the same focal point.

View 18 - Ilderton Road, looking along Manor Grove

464. This view is from Ilderton Road, looking west along Manor Grove. Although the church to the right is identified in the draft AAP as being of townscape merit, overall the view is of low sensitivity. Only a small part of the proposed development would be visible behind existing buildings, and the impact on the view would be minimal.

View 19 – Roundabout adjacent to recycling facility

465. This view is taken next to the IWMF recycling facility to the east of the application site, looking directly towards the listed gas holder. It is therefore of some heritage sensitivity. The proposed development would appear in the middle distance, directly behind the listed gas holder. As it would sit within the extent of the listed structure, and be perceived as being of lower height, it is not considered to detract from its appearance. Considered cumulatively, the Malt Street scheme would also appear in the middle distance, to the left of the listed gas holder and perceived as being of significantly lower height. Cumulatively, harm to the setting of the listed structure would therefore be avoided.

View 20 – Verney Road/ Bramcote Park

466. This view is from Verney Road, with Bramcote Park (identified as a London Square in the London Squares Preservation Act 1931) clearly visible to the left. The view is therefore of some limited sensitivity. The tallest parts of the proposed development would be visible behind the medium rise modern buildings on the western side of the square. They would appear as background elements, distinct from the buildings and the square, and would be screened by tree branches and foliage to substantial extent in

both winter and summer. As such, their visual impact would be minimal. There would be no cumulative schemes visible in this view.

Views 21 and 22 - Ilderton Road near South Bermondsey Station entrance and Sheppard Road

467. These views are from the north looking towards the proposed development. Both are of low sensitivity. In both, the proposed development would be visible in the middle distance, beyond the low scale housing further in the foreground. Given the low sensitivity of the views, and the high quality of the architecture proposed, it is considered that these views would not be harmed.

Views 23 and 24 - Camilla Road and Thorburn Square

468. Both of these views focus on sensitive heritage assets, such as the Grade II* listed former Church of St. Augustine, now converted to housing, the Grade II former Vicarage to St. Augustine and the Thorburn Square Conservation Area. The views are therefore of relatively high heritage sensitivity, but the proposed development would be completely obscured from sight by existing buildings in both and would therefore have no effect.

View 26 – Canal Grove

469. This view is from the pedestrian footpath leading towards the site from Canal Grove. Although the Canal Grove Cottages are Grade II listed, only the gable is visible in this view to the left of the image. The main frontages of the cottages face west. The cottages are understood in the context of a variety of types of development, primarily modern and post-war warehouse and retail units. The existing buildings on the site which are seen at the end of Canal Grove are a poor quality focus for the view. As a result, this view is of medium sensitivity.
470. The proposed development would be visually prominent on the other side of Sandgate Street. The route into the site from Sandgate Street would be aligned with Canal Grove and readily apparent in this view, inviting pedestrians into the proposed central open space. The substantial reduction of an eight storey block that was originally proposed into this location, negotiated by officers during pre application discussions, is of significant benefit in this view.
471. The arrangement of the buildings and their different heights within the proposed development would result in a visually interesting composition, with a general stepping up in height towards the north. The architecture would be of a high quality and the elevational strategy would ensure that visual coalescence was avoided, whilst creating visual interest. There would be no cumulative schemes visible in this view.
472. The scale of the proposed development would be substantially greater than that of the existing buildings on the site and would represent a considerable change to the local context and the setting of the listed Canal Grove cottages. It is important to note however, that the cottages are a fragment of historic development, currently surrounded by other modern development. Officers are of the view that the harm caused would be less than substantial and are satisfied that this harm would not undermine the heritage significance of the listed properties and that it would be outweighed by the wider regeneration benefits of the proposals. HE does not raise any concerns about this view.



Figure 22 View 26 – Canal Grove

Views 27 and 28 – Old Kent Road, Opposite St. James’s Road and Old Kent Road Opposite Murdock St

473. These views are from the southern side of Old Kent Road, one looking south east towards the proposed development and one looking north west. View 28 from the junction with Murdock Street, is in the vicinity of the Grade II listed Camberwell Public Library and Livesey Museum and other buildings of architectural or historic interest as identified in the draft OKR AAP. This view is therefore of some heritage significance, but as the surrounding townscape is of low quality it is not considered to contribute well to the settings of the heritage assets. The proposed development would be visually prominent, but given the low quality of the existing townscape and the high quality of the architecture proposed, it is not considered that this view would be harmed. Indeed, the impact could be considered beneficial. There would be no cumulative schemes visible in this view.

View 29 – Green Hundred Road, looking along Ethnard Road

474. This view is from western side of Green Hundred Road, looking north-east along Ethnard Road. The northern side of the road is lined by two storey Victorian terraced housing of coherent quality. These houses, and those visible at the end of the road, are identified as buildings of townscape merit in the OKR AAP. The view is therefore of some limited heritage and townscape sensitivity. The three tall buildings of the proposed development would be visible in the background of the view. They would step up in height, resulting in a visually interesting composition and overall sense of order. Each tall building would have a strong vertical emphasis and visual coalescence would be avoided. The tops of the buildings would be distinctive on the skyline. It is not considered that they would result in any harm. There would be no cumulative schemes visible in this view.

View 30 - Peckham Park Road/ opp. Green Hundred Road

475. This view is from the western side of Peckham Park Road, opposite the junction with Green Hundred Road. The five storey brick block of the Friary Estate is visible, as is the three storey 19th century terrace on Peckham Park Road. The latter was identified as buildings and features of townscape merit in the draft Old Kent Road AAP. The view is therefore of some very limited sensitivity. The proposed development would be visually

prominent, but would appear clearly distinct from these buildings in the foreground of the view. It is not considered that it would result in any harm. There would be no cumulative schemes visible in this view.

Borough Views

476. Although of limited weight, the draft NSP, Policy P19, 'Borough Views', states that development must positively enhance the borough views which have been identified. The Borough Views potentially impacted on by the proposed development are the London Panorama of St Paul's Cathedral from One Tree Hill and the linear view of St Paul's Cathedral from Nunhead Cemetery. 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.
477. The Site does not fall within the Landmark Viewing Corridor or the Wider Setting Consultation Areas to either side of each corridor, from either One Tree Hill or Nunhead Cemetery.

Nunhead Cemetery

478. This Borough View is located in Nunhead Cemetery, within the Nunhead Cemetery Conservation Area. 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 view is of high sensitivity.
479. The proposed development would be located well to the side of St. Paul's Cathedral in this view, and obscured by tree branches to such an extent that it would be virtually indiscernible, even in winter. It is considered that there would be no harm to this view. The Malt Street scheme would be visible to a minor extent, further west (left) of the proposed development.

One Tree Hill

480. This Borough View is from on One Tree Hill in Honor Oak Park, looking towards central London. The view towards central London is framed by trees. St. Paul's Cathedral is visible to the east of the Shard (on the left side of the image). Its profile is almost entirely uninterrupted by development in its foreground. The towers in the City of London appear further west (right). The view is of high sensitivity.
481. The proposed development would be visible in the distance, towards the centre of the view, some distance from St. Paul's Cathedral and the cluster of towers in central London. It would be screened to some extent by tree branches in winter and would be largely obscured by foliage in summer. It would be read as part of an extensive panorama and would contribute to a layered townscape. It would appear as a visually interesting grouping of buildings, comprising elements of different heights and with different elevational finishes. It is considered that there would be no harm to this view. The Malt Street scheme would appear to the west (left) of the proposed development, some distance from St Paul's Cathedral.

London View Management Framework (LVMF) Views

482. London Plan (2016) Policy 7.11, London View Management Framework, and Policy 7.12, Implementing the London View Management Framework relates to the identified

strategic views in London. They state that development should not harm, 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.

483. The LVMF views likely to be impacted upon by the proposed development are 2A.1 from Parliament Hill, 3A.1 from Kenwood and 6A.1 from Blackheath Point.

Blackheath Point (LVMF 6A.1)

484. This view is from LVMF viewing location 6A.1, at Blackheath Point. The view is a panorama towards the City of London. The LVMF guidance is concerned primarily with St Paul's Cathedral, which is partially visible to the right hand side. The view is of high sensitivity in respect of the visibility of St Paul's Cathedral. The proposed development would be visible on the skyline a significant distance from St Paul's Cathedral. It would appear as part of the layered townscape in this extensive panorama, composed as a visually interesting grouping of buildings, with distinctive tops read against the skyline. The Malt Street scheme would be visible to the west (left) of the proposed development, also contributing to this coherent layer of townscape within the view and together the schemes would help to mark the area of major regeneration around Old Kent Road. It is considered that there would be no harm to this strategic view. The GLA consider that the proposed development would create an additional point of interest in this viewpoint. HE raises no objection.

Parliament Hill (LVMF 2A.1)

485. This view is from LVMF viewing location 2A.1 at the summit of Parliament Hill. The view crosses a wide span of London. The foreground is occupied by the open space of Hampstead Heath. The tall buildings of central London appear in the distance, including the City of London cluster. The vista to St Paul's Cathedral in the centre of the view is protected. The view is of high sensitivity.
486. The proposed development would be visible in the background of the view to the right of Guys Hospital and at a similar height. It would appear consistent with the existing character of the part of the view in which it appears, and would help to mark the major regeneration around Old Kent Road. There would be no effect on the silhouette of St. Paul's Cathedral or the ability to appreciate St. Paul's in this view. Considered cumulatively, the under-construction scheme at Fielden House (Shard Place), adjacent to the Shard, would appear directly behind the western towers of St. Paul's and the Malt Street scheme would appear to the west (left) of the proposed development. These other schemes would have a greater impact on the appreciation of St Paul's. It is not considered that the proposed development would result in any harm to this view.
487. HE considers that the proposed development, whilst peripheral to the central viewing corridor, would add to the existing tall buildings which currently encroach on the dome of St Paul's Cathedral. Whilst not a major impact, they do consider that this would result in some incremental harm.
488. In contrast, the GLA assess that although the proposed development would be visible to the right of Guys Hospital, in the background of the view of St Paul's, it would not detract from the viewer's ability to recognise the landmark, or harm the composition of the view as a whole. Southwark Officers agree with this assessment, but Members must balance this against advice from HE in coming to a view on the degree of harm that would be caused.



Figure 23 LVMF viewing location 2A.1 at the summit of Parliament Hill

Kenwood (LVMF 3A.1)

489. This view is from LVMF viewing location 3A.1, at the viewing gazebo at Kenwood House, set within an estate bordering Hampstead Heath. The foreground of the view is occupied by the open parkland, with a band of mature trees providing a sense of containment beyond. Central London, and particularly the tall buildings of the City, is visible beyond to the left of centre in the view. St Paul's Cathedral is visible to the right of the Shard. The vista towards St Paul's is protected. The view is of high sensitivity.
490. A small slither of Building B2 would be visible behind the Shard, to an extent that would be barely noticeable. A smaller part of Building B1 would be visible behind and to the left of St. Paul's Cathedral, in the gap between it and the Shard. The apparent height of this part of B1 would be considerably lower than that of the dome of St. Paul's. In practice, at this distance, it would be barely discernible without the aid of binoculars, and would have no effect on the viewer's ability to appreciate St. Paul's. Considered cumulatively, the under-construction scheme at Fielden House (Shard Place), adjacent to the Shard, will also appear in the gap between the Shard and St. Paul's Cathedral, and would completely obscure Building B1 from sight. It is therefore considered that there would be no harm to this view. The GLA conclude that the proposed development would not be visible behind St Paul's Cathedral and HE raises no objection.

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

491. In conclusion in relation to the TVIA, it is clear from the assessment that the proposed development would have a significant impact on many of the sensitive views assessed. However, in the majority of cases, the impact is not considered to be harmful. Indeed in some views it is considered beneficial. The quality of design would be high, with a good composition of buildings strong vertical emphasis and characterful tops creating new interest on the skyline.
492. There is however seven views where either Southwark Officers or HE (or both) consider that there would be some harm to townscape and heritage significance. Neither Southwark Officers nor HE consider that this harm would be 'substantial', as defined by the NPPF, and Southwark Officers do not consider that the degree of harm would warrant refusal of this planning application. Members need to assess the degree of harm

and be satisfied that it would be outweighed by the other substantial regeneration benefits of this proposal.

Impact on trees

493. Saved Policy 3.13 of the Southwark Plan requires high quality and appropriately designed streetscape and landscape proposals. The Council's Urban Forester has identified that the "loss of two small C category Sycamores and other groups of low importance to amenity is more than adequately mitigated via the proposed landscaping, which will provide a net increase in canopy cover."

Planning obligations (S.106 undertaking or agreement)

494. Saved Policy 2.5 'Planning obligations' of the Southwark Plan and policy 8.2 of the London Plan advise that Local Planning Authorities should seek to enter into planning obligations to avoid or mitigate the adverse impacts of developments which cannot otherwise be adequately addressed through conditions, to secure or contribute towards the infrastructure, environment or site management necessary to support the development, or to secure an appropriate mix of uses within the development. Further information is contained within the Council's adopted Planning Obligations and Community Infrastructure Levy SPD. A Section 106 Legal Agreement is currently being drafted which should include clauses to secure the following:

- Archaeology: £11,171;
- Affordable Housing Monitoring: £132.35 per affordable property, 451 x 132.35 = £59,689.85;
- Carbon offset – green fund: £1,445,532;
- Loss of employment floorspace: £10,590;
- Contributions to the bus network to be agreed in line with emerging TfL and LBS evidence base;
- DSP Bond: £117,367.40;
- Contribution in lieu of private / communal amenity space: £161,540;
- Public open space contribution: £299,095 (minus £31,336 paid towards retention of gas holder steels = £267,759);
- Voluntary education contribution: £60,000; and
- Section 106 admin charge.

495. In addition, the following non-financial contributions would be secured within the Section 106 Legal Agreement:

- Affordable housing: 40.5% overall, consisting of a policy compliant offer of 35% with a tenure split of 71.5% social rent and 28.5% intermediate and an "additional" 5.4% intermediate (all calculated by habitable rooms);
- Not more than 50% of the private apartments would be occupied until 50% of the affordable units are complete per phase. Following this, not more than 90% of the private sale apartments would be occupied until 100% of the affordable units are complete;
- At least 10% of dwellings to be fully wheelchair accessible;
- Jobs, skills and training during construction period (including fall-back financial contribution if targets not met);
- Jobs, skills and training once the proposed development is operational (including fall-back financial contribution if targets not met);
- 541 sqm Affordable work space (see terms below);
- Practical Completion of the commercial space under each block to be at the same time, or before, Practical Completion of the residential units above. All commercial spaces to be completed with mechanical and electrical services

- fitted out, including heating and cooling / ventilation;
 - Public sports hall and fitness facilities to be offered to Southwark Council for a peppercorn rent, with full internal fit out to LBS specifications;
 - 3 years car club membership within the re-provided car hire business, for all eligible adult residents of the proposed development;
 - 3 years dockless cycle hire or an acceptable equivalent offer;
 - Estate management strategy;
 - Future SELCHP connection;
 - Early and late stage Affordable Housing reviews;
 - Final Construction and Environment Management Plan;
 - Business Relocation and Retention Strategy;
 - Public access to open space;
 - Commitment to S278 negotiations with both Southwark Council and TfL;
 - Retention of Farrells (architects) to oversee delivery of development until completion, unless otherwise agreed in writing;
 - Retention of parking spaces for disabled residents only;
 - Maintenance of gas holder structures and retention as agreed in public space unless otherwise agreed in writing;
 - Electric Vehicle charging points; and
 - CPZ controls for any future CPZ.
496. In addition, a separate Unilateral Undertaking would secure a commitment to ensuring that any future commercial occupiers would pay employees London Living Wage as a minimum.
497. S278 Works Outline
- The Council's Highway Officers have indicated that works required through a Section 278 Agreement would include:
- a. Repaving of the footway fronting the development on Sandgate Street, Ruby Street and Hyndman Street using 600mm x 600mm concrete paving slabs and new 150mm wide silver grey natural granite stone;
 - b. Provide at least 2.4m wide footway width where this is not provided for and donating for adoption as highway;
 - c. Construct raised entry carpets at the junctions of Sandgate Street and Hyndman Street with Old Kent Road to slow down traffic and provide a level crossing surface for pedestrians;
 - d. Construct raised entry carpets at all accesses to the developments to provide a continuous level walking surface for pedestrians and the mobility impaired;
 - e. Provide more details regarding the planting of new trees in the highway. SSDM DS 501 should be the guideline for tree planting within the public highway;
 - f. The proposed public realm routes linking Old Kent Road to Sandgate Street should be available for the public but not adopted. The right of the public to pass and re-pass these routes should be defined in the s106 agreement;
 - g. Construct flush tree pit edgings around all existing trees and level;
 - h. Promote a TMO to legalise any changes to traffic restrictions; and
 - i. Upgrade street lighting to current LBS standards, including the un-adopted public realm.
498. This could also include electrical charging points integrated into lamp posts.
499. As noted above, a separate agreement with TfL would also be required.

Affordable Workspace Terms

500. The final details of the affordable workspace offer are subject to negotiations of the Section 106 Agreement, but 541 sqm GIA, across 11 units would be secured subject to the following terms:

- Weekly rental set at between £150-200 per week including service charges;
- The rental figure is based on Q2 2018 and would increase each year by RPI;
- Flexible Leases up to 5 years;
- The units will only be available for a single premises business;
- Applicants must either have an existing business in LB Southwark or be a resident of LB Southwark;
- During the construction period, a database of interested parties will be compiled and maintained;
- On completion, the units will be marketed using a website, newspapers, agencies, managing agent, database, and external signage;
- The order of eligibility will be as follows:
 - Based in the OKR AAP for 9 months
 - LB Southwark for 9 months;
- Following this process should any unit be unoccupied for more than 18 months, then it can be let on normal commercial terms (outside the 1954 Act) to any interested party for up to 5 years after which the process will start again. During this time the existing tenant can remain until an “Affordable Category” tenant is found;
- The day to day management of the space will be carried out by a suitably competent management company;
- The units will remain as affordable units for a period of 30 years;
- The specification of the units would comprise screed floors, painted blockwork walls, exposed ceiling and partly glazed frontages. The services provided would include individually metered water, electricity, telecoms/data and heating/cooling/ventilation; and
- Each unit would have an accessible WC and kitchenette including a sink and cupboard space.

501. These terms would be secured through the Section 106 Legal Agreement and the provision of this space is considered to be a significant positive aspect of the proposal, mitigating the loss of B class space and adding to the vibrancy and mix of uses.

502. In the event that a satisfactory legal agreement has not been entered into by 9th April 2019 it is recommended that the Director of Planning refuses planning permission, if appropriate, for the following reason:

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

Mayoral and Southwark Community Infrastructure Levy (CIL)

503. 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.

504. In this instance a Mayoral CIL payment of £5,331,695.34 and a Southwark CIL payment of £25,291,379.25 would be required. These are pre-social housing relief figures and accordingly would be reduced when the CIL Social Housing Relief claim is submitted after the grant of planning permission.

Development Viability

505. Southwark's Development Viability SPD requires a financial viability appraisal to be submitted for all planning applications which trigger a requirement to provide affordable housing. The financial viability appraisal should identify the maximum level of affordable housing that can be sustained and justify any proposed departures from planning policy requirements.
506. This application is therefore accompanied by viability report, which was reviewed by independent consultants on behalf of the Council. This was amended during the course of the application, following revisions described elsewhere in this report. The viability report addendum concludes that the 35% policy compliant affordable housing, together with the 5% "additional" Intermediate Housing is the maximum viable, as it would result in a negative Residual Land Value. Taking into account GLA Grant Funding, the Residual Land Value would be substantially increased, but would remain negative.
507. The independent review undertaken on behalf of LBS concludes that on an appraisal basis, the proposed scheme would not be viable with a 35% affordable housing offer (i.e. it would result in a negative Residual Land value), but that 'stand back' analysis (using evidence of local land sales with planning permission to ascertain a price per habitable room) indicates that it would be deliverable. The sensitivity analysis applied in this review also shows that relatively small changes in key variables would result in a viable scheme. As such, they conclude that the scheme can provide 35% affordable housing on a policy compliant basis.
508. GLA Officers have also interrogated the applicant's submitted viability assessment and concluded, that, as identified by both the applicant's viability consultant and the independent review commissioned by LBS, the scheme cannot deliver more than the 35% affordable housing proposed based on the tenure split. They did encourage the applicant to explore the use of grant funding. Following the proposed increase in the affordable housing offer, a revised viability review was sent to the GLA and LBS's consultant for review. Unfortunately, there was not enough time for responses to be received, but given the intention to use GLA Grant Funding, Officers are confident that a similar conclusion would be reached by both parties.
509. The affordable housing would be secured through the Section 106 Agreement, along with early and late viability reviews and affordable housing monitoring as required by the GLA. A draft Section 106 Agreement would be shared with the GLA.

Sustainable development implications

510. Policy 5.2 of the London Plan requires major developments to provide an assessment of their energy demands and to demonstrate that they have taken steps to apply the Mayor's energy hierarchy. Policies 5.5 and 5.6 require consideration of decentralised energy networks and policy 5.7 requires the use of on-site renewable technologies, where feasible. Of note is that residential buildings must now be carbon zero, and non-domestic buildings must comply with the Building Regulations in terms of their carbon dioxide emissions. An Energy statement and Sustainability Assessment based on the

Mayor's hierarchy have been submitted. Concerns raised in the GLA's Stage 1 report were addressed during the course of the application.

Be Lean (use less energy)

511. A range of passive and active energy efficiency measures are to be employed within the development including:

- High-performance, engineered facade with optimised U-values and g-values;
- Windows carefully designed to balance daylight, heat loss and heat gain;
- Solar control measures;
- Low air permeability;
- Centralised and energy efficient gas fired boilers;
- Mechanical ventilation with heat recovery; and
- Low energy lighting (LED lighting throughout).

512. After the incorporation of 'Be Lean' passive and active energy efficiency measures, the domestic CO₂ emissions would be 7% lower than a Part L1A 2013 compliant development, which is the baseline scheme. The non-domestic CO₂ emissions after the incorporation of 'Be Lean' measures would be approximately 6% lower than a Part L2A compliant development.

Be Clean (supply energy efficiently)

513. A gas-fired CHP is proposed within the site wide energy centre. The site wide energy centre will be future proofed to allow connectivity to the South East London CHP (SELCHP) District Heating Network (DHN) when it becomes available in the future. This would be secured through the Section 106 Agreement. Officers are currently developing a District Heat Network scheme with GLA and Veolia (the operators of SELCHP).

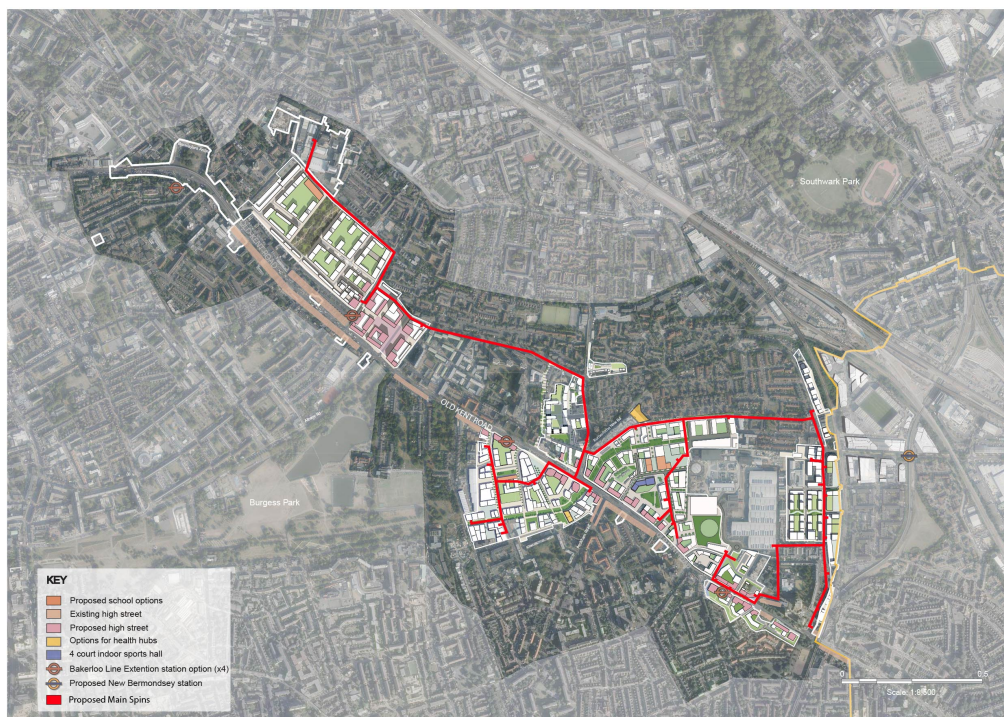


Figure 24 Potential District Heat Network within the Opportunity Area (note limited weight of draft AAP masterplan)

514. 'Be Clean' measures would provide a further 24% reduction in domestic CO₂ emissions, amounting to 31% along with 'Be Lean' measures. The non-domestic emissions would

be reduced by a further 22%, amounting to around 27% along with 'Be Lean' measures.

Be Green (low or carbon zero energy)

515. A number of renewable technologies were assessed in terms of their technical, physical and financial feasibility. The most suitable renewable technology for the proposed development was found to be solar PV panels located on the roof of Buildings A, B1 and C2.
516. 'Be Green' measures would provide a further 1% reduction in domestic emissions, amounting to a total saving of 32% across the residential component of the proposed development. This represents an annual saving of approximately 365 tonnes of CO₂. To enable the new dwellings to meet the zero carbon target, a one off carbon offset payment of approximately £1,391,205 will be required in line with Southwark's Core Strategy and London Plan Policy. This figure is based on a shortfall of 773 tonnes CO₂ per year for a period of 30 years at a rate of £60 / tonne of CO₂.
517. As there would be no PV array for the non domestic uses, the reduction in non domestic emissions would remain the same as identified at the 'Be Clean' stage. The total non domestic reduction in CO₂ emissions would therefore be approximately 27%, which represents an annual saving of approximately 109 tonnes of CO₂. To enable the non-domestic units to meet the carbon reduction target, a one off carbon offset payment of approximately £54,327 will be required in line with Southwark's Core Strategy and London Plan Policy. This figure is based on a shortfall of 30 tonnes CO₂ per year for a period of 30 years at a rate of £60 / tonne of CO₂.
518. Recognising that both the residential and commercial aspects fall below the policy requirements in relation to carbon savings, the total contribution towards the council's carbon offset fund would be £1,445,532. The applicant has agreed to make this contribution, which would be secured through the Section 106 Agreement and would therefore make this aspect of the scheme fully policy compliant. The carbon offset fund could be used for the installation of PV panels on existing buildings, insulation, tree planting, LED lightbulb exchanges, homeowner grants to replace boilers, funds for community led- projects etc.

Overheating and Cooling

519. 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.
520. Preliminary overheating analysis has been carried out in order to demonstrate compliance with Building Regulations (Part L Criterion 3). Further dynamic modelling would be undertaken as the scheme progresses towards construction. Final details would be required by condition.
521. The proposals to demonstrate compliance are as follows:
- Energy efficient enhanced ventilation systems, thermal insulation on pipework and low energy lighting;
 - Energy efficient facades with appropriate proportions of glazing;
 - External shading provided by balconies and vertical fin elements within façades;
 - Glazing shading to minimise solar gain in the summer, but also to maximise solar gain in winter;
 - Light coloured blinds;
 - Generous ceiling heights;

- Mechanical Ventilation with Heat Recovery (MVHR) units for background ventilation, incorporating a summer bypass;
- Enhanced levels of ventilation to mitigate heat build-up during summertime;
- Comfort cooling will be installed to the community facility and residential amenity spaces.

BREEAM

522. Strategic Policy 13 of the Core Strategy requires commercial units to achieve BREEAM “excellent” and community facilities to achieve “very good”. A BREEAM Pre-assessment report has been undertaken which demonstrates that the community facilities (Sports Hall) would achieve an “Excellent” rating, and the commercial units (Retail, Office and Healthcare) would achieve a “Very Good” rating as a minimum. The commercial spaces would not achieve “excellent” because the applicant only assessed it on the basis that only the shell would be delivered. As set out above, heating and cooling systems would also be provided, which should address this. The submitted sustainability statement also states that the commercial spaces could achieve a BREEAM “Excellent” following fit-out by future tenants. A planning condition is recommended to secure an independently verified BREEAM report demonstrating that the ‘excellent’ rating would be achieved prior to the fit out of any of the commercial premises.

Ecology

523. A Preliminary Ecological Assessment and Ecology Enhancement Strategy has been submitted in support of this application. The council’s ecology officer has reviewed this, and, following the submission of a Bat Emergence survey during the course of the application, has confirmed that no further surveys are required. The Ecology Enhancement Strategy makes a number of recommendations in relation to ecology that should be implemented. As a result, the site would be able to provide biodiversity net gain. The ecology officer recommended conditions relating to the following, all of which have been included with this recommendation:
- Brown roofs;
 - Nesting and bat roost enhancements;
 - Soft landscaping ecological enhancements and roofs; and
 - Implementation of all the recommendations in the Ecology Enhancement Strategy.

Other matters

Flood Risk and Water Resources

524. Chapter 13 in the ES sets out the effects of the proposed development on hydrology (i.e. the water environment) and flood risk. The application site is located within Flood Zone 3, which is considered to be ‘High Risk’ but does benefit from the Thames tidal defences. The proposed development has been designed to ensure that the buildings would be protected from surface water flooding by raising ground levels and placing residential units at levels above the proposed podiums. A Drainage Management Plan (DMP) has been prepared to ensure the Proposed Development does not increase surface water runoff once in operation. Sustainable Drainage Systems (SuDS) in the form of Green/brown/blue roofs and permeable paving are also proposed in addition to the large area of lawn in the new park. The DMP sets out that the proposed surface water discharge rate for the proposed development would be restricted to a runoff rate of 15.5 l/s, a reduction of 173.2 l/s (92%) from the existing rate providing a significant betterment. A total attenuation volume of 743m³ would be provided to accommodate the 1 in 100 year plus 40% climate change scenario.

525. The Environment Agency (EA) has reviewed the applicant's Flood Risk Assessment and considers it to be acceptable subject to conditions being attached to any grant of planning permission. The conditions are included with the recommendation.
526. The Council's Flood Risk and Drainage team have also reviewed the submitted material and Drainage Strategy. They are pleased that the drainage strategy incorporates blue, green and brown roofs and permeable paving, and note that these areas are then supplemented with two underground attenuation tanks. They consider the amount of water to be attenuated to be a good achievement.
527. Due to the basement and ground levels of the site being at residual flood risk from the River Thames, and some surface water flood risk, the flood risk team have requested a Basement Impact Assessment, a Flood Resistance and Resilience Report and a stand alone Flood Warning and Emergency Evacuation Plan to be required by planning condition. The conditions are included with the recommendation.

Fire Safety Strategy

528. A high level fire safety strategy has been submitted by the applicant. This confirms that the functional requirements of the Building Regulations relating to fire safety would be satisfied through application of Approved Document B - Volume 2 – Buildings other than Dwellinghouses (ADB), as well as guidance from relevant British Standards. Sprinkler systems designed in accordance with BS 9251 would be provided in all apartments. Open plan apartments with open kitchens would have sprinklers and Category LD1 automatic fire detection designed to BS 5839-1, and cooking equipment would be suitably separated from the escape routes. The apartments in each building would be served by a single firefighting stair and firefighting lift, and would be accessed via common corridors. Mechanical smoke ventilation would be provided to the common corridors in accordance with the guidance in BS 9999. Each apartment would be enclosed with a minimum of 1 hour compartmentation and have sprinkler protection to support the 'Defend in Place' evacuation strategy. In addition, the external wall surface would achieve Class 0 (National Classification) or Class B-s3, d2 or better (European Classification) surface spread of flame classification, and cavity barriers in any external wall cavity would be provided in accordance with Clause 19 of BS 9991.

Archaeology

529. Chapter 15 in the ES presents an assessment of potential impacts on archaeology. This has been reviewed by the Council's archaeology officer, who has advised the following:

This large site lies within two borough designated Archaeological Priority Zones (APZs): 'Bermondsey Lake' and 'Old Kent Road'. The 'Bermondsey Lake' APZ 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. The 'Old Kent Road' APZ has the potential to contain features associated with the former route of 'Watling Street', the major Roman road between London and Canterbury. Significant archaeological remains predominately of prehistoric and Roman date have been discovered along the Old Kent Road from a number of sites.

These works have identified multi-period archaeological deposits including in situ prehistoric flint-work and Roman settlement features, as well as medieval and post-medieval archaeological deposits.

530. The Ruby Triangle has the potential to contain significant archaeological remains which should be appropriately managed.
531. In accordance with the council's saved Policy 3.19 applicants are required to submit a

desk based assessment (DBA) and the results of an archaeological evaluation in support of planning applications within Archaeological Priority Areas. The applicant has submitted a DBA and has carried out two stages of predetermination fieldwork, which has demonstrated that archaeological cut features do survive on the site. The works to date, although of a small scale (owing to logistical constraints), also show that the site has been subject to impacts from previous developments, which will have compromised the archaeological deposits in localised areas across the site.

532. On balance, there is now sufficient information to establish that the development is not likely to cause such harm as to justify refusal of planning permission on the grounds of archaeological interest provided that robust archaeological conditions are applied to any grant of consent. However, the applicant must be mindful that for any archaeological remains that are encountered - if these cannot be preserved in situ under a foundation design condition - they must be prepared to pay for and manage the excavation of these remains entirely and/or potentially lift and preserve off-site or in the new development any previously unknown but important remains. Other requirements will also be to carry out full archaeological post-excavation mitigation. The benefits of doing some further early phases of trial trench evaluation cannot be overstated and this would put the applicant in a more informed position.
533. The required conditions are included with this recommendation and relate to:
- Archaeological Evaluation
 - Archaeological Mitigation
 - Archaeological Foundation Design
 - Archaeology Reporting Site Work

Contaminated Land

534. Chapter 12 of the ES relates to ground conditions and soil and notes that the site has had a number of industrial uses over the past two centuries, including commercial and industrial uses which could present a source of contamination. Also, within 250m of the site there have also been a number of industrial land uses which could present sources of contamination on-site, particularly the South Metropolitan Gas Works. The ES identified that during construction there could be a risk of the exposure of construction workers / adjacent land uses to exposed contaminated materials (i.e. during excavation) and leaching of contamination to underlying aquifers. The ES sets out potential mitigation measures that would be employed depending on the type of contamination encountered (which is to be assessed during an intrusive ground investigation prior to development). Potential risks were also identified post construction. As above, the mitigation measures will depend on the nature and extent of the contamination (if encountered) during a future ground investigation and appropriate risk assessment.
535. The submitted material has been reviewed by both the EA and EPT. Both have recommended conditions to deal with contaminated land which have been included with this recommendation.

Hazardous Sites

536. Paragraph 45 of the NPPF states that local planning authorities should consult the appropriate bodies when planning, or determining applications, for development around major hazards. The site is located within the designated Consultation Distance of a Major Hazard Site (Old Kent Road Gasholder Station, 709 Old Kent Road) and as such the Health and Safety Executive (HSE) is a statutory consultee for this application.
537. Advice from HSE is that there are sufficient reasons, on safety grounds, for advising against the granting of planning permission as there would be a risk of harm to people at

the proposed development. Alternatively, they would not advise against the granting of planning permission for the proposed development if the following condition were to be attached to the permission, so as to prevent the occupation of any of the buildings until the hazardous substances consent for the Old Kent Road Gas Holder Station has been revoked:

538. "No part of the development shall be occupied until the hazardous substances consent for the storage and distribution of natural gas at the Old Kent Road Gas Holder Station has been revoked in its entirety under the provisions of the Planning (Hazardous Substances) Act 1990, and written confirmation of the necessary revocation has been issued by the Hazardous Substances Authority."
539. In the event that Planning Committee resolves to grant permission without applying the condition recommended by the HSE, the HSE should be notified in accordance with Section 9, Paragraph 072 of the online Planning Practice Guidance on Hazardous Substances - Handling development proposals around hazardous installations, published by the Department for Communities. The HSE then has 21 days from that notice to consider whether to request that the Secretary of State for Communities and Local Government to call-in the application for their own determination.
540. The Old Kent Road Gasholder Station was designated a major accident hazard establishment under EU Directive 96/82/EC (the Seveso II Directive) as amended by Directive 2003/105/EC. Saved Policy 3.10 'Hazardous Substances' of the Southwark Plan (2007) states that planning permission for development including hazardous substances, and development in the vicinity of sites where hazardous substances are used, stored or transported, will only be granted if it can be demonstrated that such development will not materially harm or put at risk the health, safety or amenity of users of the site, neighbouring occupiers or the environment. This policy reflects the requirements of the Seveso II Directive (1999) which requires that land use policies take into account the prevention of major accidents involving hazardous substances and limiting their consequences for people and the environment.
541. The Gas Holder Station is no longer operational and was de-notified under the Control of Major Accident Hazards Regulations in 2015, but its Hazardous Substances Licence has not yet been revoked. It is HSE's policy to continue to provide land use planning advice around major hazard sites until all hazardous substances consents which relate to the site have been formally revoked by the hazardous substances authority in accordance with Sections 14 or 17 of the Planning (Hazardous Substances) Act 1990.
542. Officers have been in discussion with Southern Gas Networks (SGN) about the potential to develop the sites still in their ownership as part of the draft OKR AAP masterplan aspirations. Initial discussions have been encouraging and Officers are seeking to get to a position where the licence will be revoked.
543. Given that the gasholder station is no longer operational, and that two of the three remaining gas holders have now been demolished, it is not considered that it would be proportionate to refuse planning permission on the basis that the hazardous substances licence has not yet been revoked. It is also considered that the condition recommended by the HSE would be unnecessarily onerous, and is therefore not included with this recommendation.
544. It is also worth noting that the recently developed site at 8-24 Sylvan Grove, which is also within the designated Consultation Distance from the Gas Holder, has been previously granted two separate planning permissions, one for mixed use development (commercial and residential) and one for residential development (13/AP/2782 and 15/AP/1330 respectively). The latter has now been built. HSE advised against the granting of planning permission in both cases, and in both cases was given advance

notice of the intention to grant permission. In neither case did the HSE decide to call the application in, “after careful consideration and on the basis that the council fully understand the major accident risks to people at the development”. Their response to these applications does state that this does not mean that they have withdrawn their advice against the proposals and that “the decision in this case should not be seen as setting a precedent for other applications around major accident hazards in the borough”.

Aviation

545. Chapter 19 in the ES presents an assessment of potential impacts on aviation. The tallest proposed building would penetrate London City Airport’s ‘Outer Horizontal Surface’ (OHS) which is of large significance for aviation. National Air Traffic Services (NATS) were consulted about this and initially objected to the application, but then withdrew their objection based on the potential for the concerns raised to be addressed by mitigation. NATS recommended conditions relating to a ‘radar mitigation scheme’, both of which have been included with this recommendation.

Telecommunications and Electronic Interference

546. Chapter 20 in the ES presents an assessment of the potential electrical interference that could be caused by the proposed development. This chapter concludes that, overall the proposed development would have minor, adverse, short-term impacts upon a small number of local television users, particularly digital satellite television users to the immediate northwest of the Site. It also identifies that simple mitigation solutions exist that would enable the restoration of reception, leaving no long-term residual effects. Arqiva have responded to consultation on the application, stating that they have no objection to the proposed development, but noting that there is some potential interference with viewer reception. A planning condition has been included requiring details of any impact on television, radio and other telecommunications services, including the measures to be taken to rectify any problems identified.

Waste Capacity

547. London Plan (2016) Policy 5.17 H requires that “if, for any reason, an existing waste management site is lost to a non-waste use, an additional compensatory site provision will be required that normally meets the maximum throughput that the site could have achieved”. Approval has recently been given for LBS to purchase land near the application site on which compensatory provision for the loss of Southwark Metals would be provided. As required by the London Plan (2016) policy, this would be addressed through LDF preparation and secured in the final OKR AAP. It is also worth noting that the Council have agreed on a cross borough level how waste apportionment will be managed. The Integrated Waste Management Facility is the only waste site in the borough being safeguarded.

Socio-Economics Effects and Population and Human Health

548. Chapter 7 in the ES presents an assessment of the potential socio economic effects of the proposed development. This chapter concludes that, during the construction phase, the majority of businesses and services would be moved or displaced. However, the Enterprise car rental business would remain trading on site throughout. The revised phasing strategy also ensures that the office currently used by Constantine Ltd. would not be demolished before the end of their lease, and the applicant has offered a number of options for their relocation into the proposed development. The final CEMP, to be secured by the Section 106 Agreement, would ensure that construction methods and practices were not harmful to businesses remaining on the site.

549. The ES states that “construction works are expected to create the around 2,708 person years of temporary employment jobs over construction development lifetime equating to 271 permanent construction jobs along with wider multiplier employment benefits”.
550. Once constructed, the operational phase is expected to provide 298 full time jobs, which equates to a net gain of 166 jobs on the application site. During the course of the application, the applicant has agreed to enter into a Unilateral Undertaking to ensure employees in the proposed development are paid the London Living Wage. One of the existing churches would be re-provided on site, and one existing business would remain (Enterprise). Officers are satisfied that other businesses have been engaged with by the applicant and offered relocation within the proposed development where appropriate. In addition, a tech incubator, 541 sqm of affordable workspace and a new public sports hall and gym facility would be provided. The proposed development would also provide 4,301 sqm publically accessible open space. This represents a substantial new public park for the local area which would have the potential to connect with other open spaces proposed as a part of the wider regeneration of the Old Kent Road Opportunity Area.
551. It is estimated that the new population of the proposed development would be approximately 2,400 people, including 309 children, who would require local services including health and education. The ES concludes that, based on public data sources, there is sufficient capacity in local services to accommodate these new people, supported by further mitigation that would be delivered with contributions to the Community Infrastructure Levy.
552. Chapter 8 in the ES presents an assessment of the potential impacts of the proposed development on population and human health. This considers the combined effects on health identified by other technical disciplines including Socio Economics, Townscape and Visual, Transport and Access, Air Quality, Noise and Vibration, Hydrology and Flood Risk, and Ground Conditions and Soils.
553. A range of effects on human health have been identified during the construction phase, including the displacement of employment and community facilities, minor transport delays, adverse air quality effects and temporary noise and vibration effects. However, the technical chapters of the ES go on to identify a range of mitigation which would ensure that the overall adverse effect is negligible, temporary, and of only slight significance.
554. In terms of the operational phase of the proposed development the ES identifies moderate improvements to human health through measures such as improvements to the pedestrian and cycle environments, new homes and affordable homes, new jobs, enhanced and additional green space / amenity space and a new public sports hall and gym facility. Adverse operational noise impacts experienced by nearby dwellings would be minor and the ES does not consider them to be significant. Noise levels and lighting design would be controlled by planning conditions to avoid harmful impacts. Taking account of proposed mitigation, the ES concludes that the overall health effects would be of slight beneficial significance.
555. The Council's Public Health team were consulted on this application and have agreed that a Health Impact Assessment (HIA) should be required by planning condition. This planning condition should ensure that all mitigation measures proposed in the submitted HIA are implemented.

Conclusion on planning issues

556. The proposed development would result in the introduction of residential uses into to the SIL would therefore represent a departure from the adopted development plan. However, the adopted London Plan (the most up to date adopted development plan for

the area) clearly identifies the Old Kent Road as an opportunity area which will undergo significant transformation with substantial growth including new housing. In advance of emerging policy being adopted, and SIL being formally released, this proposal must be weighed against the wider regeneration benefits of the scheme which would include:

- A substantial contribution of 1,152 new dwellings to the borough's housing stock;
- A policy compliant offer of 35% affordable housing (split 71.5% social rented to 28.5% intermediate) and an "additional" contribution of 5.4% intermediate housing. This would be a total 451 new affordable dwellings;
- 298 new full time jobs, representing a net increase of 166 full time employment opportunities and an agreement to enter into a unilateral undertaking to ensure that all employees are paid London Living Wage;
- 5,328 sqm of good quality, flexible work space, including 541 sqm affordable workspace;
- Space for existing businesses and place of worship to be relocated;
- A new public four court sports hall and gym facility to be offered to the council for a peppercorn rent;
- A new publicly accessible park of 3,792sqm, set within a total public realm offer of 4,301sqm;
- Improved connectivity, particularly for cyclists and pedestrians;
- A new and innovative cycle hub; and
- Retained buildings of townscape merit on the Old Kent Road frontage and the reintroduction of a high street character

557. In light of this, officers consider that the departure from the adopted local plan policy can be justified and the principle of the proposed development in land use terms should be supported.
558. The proposed buildings would be of exemplary architectural design, using materials and detailing of the highest quality. The ground floor pedestrian experience would be vibrant and well animated with characterful ground floor frontages enhancing the surrounding area. The building heights proposed would represent a step change in the existing scale of the area, but as an Opportunity Area site, it is considered that the height proposed would be in accordance with the objectives of the London Plan (2016), in that it would optimise the development potential of the site without harming the character of the surrounding area. The impact on the settings of surrounding conservation areas and listed buildings would generally be either beneficial or neutral. Where there would be some potential minor harm, this should be weighed against the wider regeneration benefits of the scheme as set out above.
559. The proposal would deliver a very high standard of accommodation, which would comply with the majority of the standards and principles of exemplary residential design, as set out in Southwark's residential design standards SPD. Where these standards would not be met, particularly in relation to the relatively high proportion of single aspect units and the floors where more than eight units would be served by a core, any potentially negative impacts are mitigated by other aspects of the design. Over 10% of the proposed dwellings would be fully wheelchair accessible.
560. The impacts of the scheme in relation to daylight and sunlight are generally considered good, with the majority of surrounding properties meeting the standards set by the BRE. Where these standards are not met, the remaining daylight sunlight levels are still considered adequate for a dense urban area.
561. In order to ensure that on-street servicing and deliveries do not negatively impact on the highway network, the applicant has agreed to enter into a Delivery Service Plan (DSP) Bond with the Council. Cycle and car parking levels are acceptable, and innovative proposals to encourage people to use alternative transport measures, such as the cycle

hub, are welcomed.

562. It is therefore recommended that planning permission be granted subject to conditions, referral to the Mayor of London, referral to the Secretary of State, referral to the Health and Safety executive and the completion of a Section 106 Legal Agreement under the terms as set out above.

Community impact statement / Equalities Assessment

563. 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 connect to that characteristic
 - Take steps to meets 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

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

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

566. The Council has given due regard to the above needs and rights where relevant throughout the course of determining this application and consider that the proposals would not give rise to any equalities issues.

Consultations

567. Details of consultation undertaken by the applicant on the proposed development prior to submission of the planning application have been provided in a Statement of Community Involvement. This states that five public exhibitions took place between 13 December 2017 and 24 February 2017. They were publicised by stamped, addressed invitation leaflets, adverts in the Southwark News and a live project website. The applicant has also met local ward councillors.

568. Details of consultation and any re-consultation undertaken in respect of this application are set out in Appendix 1. As noted above, re-consultation in line with Regulation 25 of the Town and Country Planning (Environmental Impact Assessments) Regulations 2017 was required because further EIA information and evidence was submitted.

Consultation replies

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

Human rights implications

570. 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.
571. 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.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/2404-1 Application file: 18/AP/0897 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 7194 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	Sarah Parsons, Team Leader	
Version	Final	
Dated	24 September 2018	
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, Environment and Social Regeneration	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
Date final report sent to Constitutional Team		27 September 2018

APPENDIX 1**Consultation undertaken****Site notice date:** 10/04/2018**Press notice date:** 19/04/2018**Case officer site visit date:** n/a**Neighbour consultation letters sent:** 11/04/2018**Internal services consulted:**

Ecology Officer
 Economic Development Team
 Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]
 Flood and Drainage Team
 HIGHWAY LICENSING
 Highway Development Management
 Housing Regeneration Initiatives
 Parks & Open Spaces
 Property Division
 Public Health Team
 Waste Management

Statutory and non-statutory organisations consulted:

Arqiva - digital communications
 Civil Aviation Authority
 Council for British Archaeology
 EDF Energy
 Environment Agency
 Greater London Authority
 Health & Safety Executive
 Historic England
 London Borough of Lewisham, Building Services South
 London Fire & Emergency Planning Authority
 London Underground Limited
 Metropolitan Police Service (Designing out Crime)
 National Air Traffic Safeguarding Office
 National Planning Casework Unit
 Natural England - London Region & South East Region
 Network Rail (Planning)
 Thames Water - Development Planning
 Transport for London (referable & non-referable app notifications and pre-apps)

Neighbour and local groups consulted:

641 Old Kent Road London SE15 1JU
 Unit 11 57 Sandgate Street SE15 1LE
 20-26 Sandgate Street London SE15 1LE
 10-18 Sandgate Street London SE15 1LE
 1 Ruby Triangle London SE15 1LG

Flat 4 670 Old Kent Road SE15 1JF
 Flat 3 670 Old Kent Road SE15 1JF
 19b Peckham Park Road London SE15 6TR
 Storage Land Part Unit 9 709 Old Kent Road SE15 1JZ
 Living Accommodation 14 Ruby Street SE15 1LL

648 Old Kent Road London SE15 1JF
 589 Old Kent Road London SE15 1LA
 Unit 4 709 Old Kent Road SE15 1JZ
 676-680 Old Kent Road London SE15 1JF
 36b Ethnard Road London SE15 1RU
 626 Old Kent Road London SE15 1JB
 634 Old Kent Road London SE15 1JB
 Unit 26 Kent Park Industrial Estate SE15 1LR
 Unit 28 To 32 Kent Park Industrial Estate SE15 1LR

683 Old Kent Road London SE15 1JS
 681 Old Kent Road London SE15 1JS
 615-629 Old Kent Road London SE15 1JU
 674 Old Kent Road London SE15 1JF
 671-679 Old Kent Road London SE15 1JS
 691-695 Old Kent Road London SE15 1JS
 651-653 Old Kent Road London SE15 1JU
 Unit 9 57 Sandgate Street SE15 1LE
 Unit 1 57 Sandgate Street SE15 1LE
 Unit 1 Sandgate Trading Estate SE15 1LE
 Unit 4 57 Sandgate Street SE15 1LE
 591 Old Kent Road London SE15 1LA
 639 Old Kent Road London SE15 1JU
 Unit 16 To 18 Kent Park Industrial Estate SE15 1LR
 654 Old Kent Road London SE15 1JF
 22 Peckham Park Road London SE15 6TW
 20 Peckham Park Road London SE15 6TW
 1a Peckham Park Road London SE15 6TR
 8 Peckham Park Road London SE15 6TW
 14 Peckham Park Road London SE15 6TW
 12 Peckham Park Road London SE15 6TW
 18 Peckham Park Road London SE15 6TW
 16 Peckham Park Road London SE15 6TW
 6 Peckham Park Road London SE15 6TW
 4 Verney Road London SE16 3DH
 24 Peckham Park Road London SE15 6TW
 20a Ethnard Road London SE15 1RU
 14-16 Verney Road London SE16 3DZ
 9 Peckham Park Road London SE15 6TR
 3 Peckham Park Road London SE15 6TR
 2 Livesey Place London SE15 6SL
 Unit 7 57 Sandgate Street SE15 1LE
 2a Ruby Street London SE15 1LL
 1 Peckham Park Road London SE15 6TR
 Unit 8 57 Sandgate Street SE15 1LE
 Unit 1 709 Old Kent Road SE15 1JZ
 Unit 5 To 6 57 Sandgate Street SE15 1LE
 Unit 9 709 Old Kent Road SE15 1JZ
 11 Peckham Park Road London SE15 6TR
 5 Peckham Park Road London SE15 6TR
 21 Peckham Park Road London SE15 6TR
 10 Peckham Park Road London SE15 6TW
 7 Peckham Park Road London SE15 6TR
 15 Peckham Park Road London SE15 6TR
 13 Peckham Park Road London SE15 6TR
 17 Peckham Park Road London SE15 6TR
 Flat 6 Lynn House Friary Estate SE15 1RR
 Flat 5 Lynn House Friary Estate SE15 1RR
 Flat 8 Lynn House Friary Estate SE15 1RR
 Flat 7 Lynn House Friary Estate SE15 1RR
 Flat 3 Lynn House Friary Estate SE15 1RR
 Flat 29 Lynn House Friary Estate SE15 1RR
 Flat 4 Lynn House Friary Estate SE15 1RR
 Flat 30 Lynn House Friary Estate SE15 1RR
 Flat 9 Lynn House Friary Estate SE15 1RR
 Flat 6 Royal London Buildings SE15 1RX
 Flat 5 Royal London Buildings SE15 1RX
 Flat 8 Royal London Buildings SE15 1RX
 Flat 7 Royal London Buildings SE15 1RX
 Flat 2 Royal London Buildings SE15 1RX
 Flat 1 Royal London Buildings SE15 1RX
 Flat 4 Royal London Buildings SE15 1RX
 Flat 3 Royal London Buildings SE15 1RX
 Flat 18 Lynn House Friary Estate SE15 1RR
 Flat 17 Lynn House Friary Estate SE15 1RR
 Flat 2 Lynn House Friary Estate SE15 1RR
 Flat 19 Lynn House Friary Estate SE15 1RR
 Flat 14 Lynn House Friary Estate SE15 1RR
 Flat 13 Lynn House Friary Estate SE15 1RR

644-646 Old Kent Road London SE15 1JF
 Flat 10 610 Old Kent Road SE15 1JB
 Flat 9 610 Old Kent Road SE15 1JB
 Flat 12 610 Old Kent Road SE15 1JB
 Flat 11 610 Old Kent Road SE15 1JB
 Flat 2 666 Old Kent Road SE15 1JF
 1d Livesey Place London SE15 6SL
 1c Livesey Place London SE15 6SL
 Maisonette First Floor To Third Floor Flat 654 Old Kent Road SE15 1JF
 Ground Floor Rear 16 Peckham Park Road SE15 6TW
 Ground Floor Front 16 Peckham Park Road SE15 6TW
 1b Livesey Place London SE15 6SL
 1a Livesey Place London SE15 6SL
 6 Canal Grove London SE15 1LB
 5 Canal Grove London SE15 1LB
 8 Canal Grove London SE15 1LB
 7 Canal Grove London SE15 1LB
 2 Canal Grove London SE15 1LB
 4 Canal Grove London SE15 1LB
 3 Canal Grove London SE15 1LB
 9 Canal Grove London SE15 1LB
 2 Ethnard Road London SE15 1RU
 24 Ethnard Road London SE15 1RU
 22 Ethnard Road London SE15 1RU
 12 Ethnard Road London SE15 1RU
 40-64 Sandgate Street London SE15 1LE
 18 Ethnard Road London SE15 1RU
 14 Ethnard Road London SE15 1RU
 626b Old Kent Road London SE15 1JB
 Flat 6 Lyons Court SE15 1RT
 Flat 9b Royal London Buildings SE15 1RX
 Flat 9a Royal London Buildings SE15 1RX
 Flat 3 Lyons Court SE15 1RT
 Flat 2 Lyons Court SE15 1RT
 Flat 5 Lyons Court SE15 1RT
 Flat 4 Lyons Court SE15 1RT
 Flat 9c Royal London Buildings SE15 1RX
 8 Sandgate Street London SE15 1LE
 The Everlasting Arms Ministry 600-608 Old Kent Road SE15 1JB
 40b Ethnard Road London SE15 1RU
 40a Ethnard Road London SE15 1RU
 9d Peckham Park Road London SE15 6TR
 9c Peckham Park Road London SE15 6TR
 Luxford Bar 610 Old Kent Road SE15 1JB
 Flat A 614 Old Kent Road SE15 1JB
 Flat A 669 Old Kent Road SE15 1JU
 Ground Floor Flat 3 Ethnard Road SE15 1RY
 World Harvest Christian Centre 25-27 Ruby Street SE15 1LL
 Flat B 669 Old Kent Road SE15 1JU
 First Floor Flat 660 Old Kent Road SE15 1JF
 Flat 1 681a Old Kent Road SE15 1JS
 First Floor Flat 668 Old Kent Road SE15 1JF
 Land 669 Old Kent Road SE15 1JU
 Flat 3 666 Old Kent Road SE15 1JF
 Ledbury Estate Tenants Hall Old Kent Road SE15 1JF
 Workshop 669 Old Kent Road SE15 1JU
 First Floor 636 Old Kent Road SE15 1JB
 631-633 Old Kent Road London SE15 1JU
 666b Old Kent Road London SE15 1JF
 Front Of 636 Old Kent Road SE15 1JB
 Unit 7a 709 Old Kent Road SE15 1JZ
 Units 1 To 3 Wevco Wharf SE15 1LE
 The Lodge Sandgate Trading Estate SE15 1LE
 Unit 2 To 3 57 Sandgate Street SE15 1LE
 Flat C 616 Old Kent Road SE15 1JB
 Flat B 616 Old Kent Road SE15 1JB
 Flat C 668 Old Kent Road SE15 1JF
 Flat B 668 Old Kent Road SE15 1JF
 Flat 1 683 Old Kent Road SE15 1JS
 Flat 1 8 Ethnard Road SE15 1RU
 Flat A 616 Old Kent Road SE15 1JB
 Flat 2 683 Old Kent Road SE15 1JS
 Flat 6 610 Old Kent Road SE15 1JB
 Flat 5 610 Old Kent Road SE15 1JB
 Flat 8 610 Old Kent Road SE15 1JB
 Flat 7 610 Old Kent Road SE15 1JB
 Flat 2 610 Old Kent Road SE15 1JB
 Flat 1 610 Old Kent Road SE15 1JB

Flat 16 Lynn House Friary Estate SE15 1RR
 Flat 15 Lynn House Friary Estate SE15 1RR
 Flat 20 Lynn House Friary Estate SE15 1RR
 Flat 26 Lynn House Friary Estate SE15 1RR
 Flat 25 Lynn House Friary Estate SE15 1RR
 Flat 28 Lynn House Friary Estate SE15 1RR
 Flat 27 Lynn House Friary Estate SE15 1RR
 Flat 22 Lynn House Friary Estate SE15 1RR
 Flat 21 Lynn House Friary Estate SE15 1RR
 Flat 24 Lynn House Friary Estate SE15 1RR
 Flat 23 Lynn House Friary Estate SE15 1RR
 614 Old Kent Road London SE15 1JB
 596-598 Old Kent Road London SE15 1JB
 622 Old Kent Road London SE15 1JB
 616 Old Kent Road London SE15 1JB
 The Prince Of Wales 14 Ruby Street SE15 1LL
 682 Old Kent Road London SE15 1JF
 Unit 6 Sandgate Trading Estate SE15 1LE
 Unit 5 Sandgate Trading Estate SE15 1LE
 624 Old Kent Road London SE15 1JB
 670 Old Kent Road London SE15 1JF
 666 Old Kent Road London SE15 1JF
 684 Old Kent Road London SE15 1JF
 First Floor And Second Floor Flat 634 Old Kent Road SE15 1JB
 632 Old Kent Road London SE15 1JB
 628 Old Kent Road London SE15 1JB
 Unit 7 Sandgate Trading Estate SE15 1LE
 652 Old Kent Road London SE15 1JF
 10 Canal Grove London SE15 1LB
 Unit 10 57 Sandgate Street SE15 1LE
 12 Canal Grove London SE15 1LB
 11 Canal Grove London SE15 1LB
 Unit 20 Kent Park Industrial Estate SE15 1LR
 Flat 9 Royal London Buildings SE15 1RX
 Unit 24 Kent Park Industrial Estate SE15 1LR
 Unit 22 Kent Park Industrial Estate SE15 1LR
 13 Canal Grove London SE15 1LB
 Flat 4a Royal London Buildings SE15 1RX
 1 Canal Grove London SE15 1LB
 Outside 1 Murdock Street SE15 1LW
 Flat 4b Royal London Buildings SE15 1RX
 15 Canal Grove London SE15 1LB
 14 Canal Grove London SE15 1LB
 17 Canal Grove London SE15 1LB
 16 Canal Grove London SE15 1LB
 20b Ethnard Road London SE15 1RU
 6 Lewes House Friary Estate Green Hundred Road SE15 1RP
 5 Lewes House Friary Estate Green Hundred Road SE15 1RP
 8 Lewes House Friary Estate Green Hundred Road SE15 1RP
 7 Lewes House Friary Estate Green Hundred Road SE15 1RP
 39 Lewes House Friary Estate Green Hundred Road SE15 1RP
 38 Lewes House Friary Estate Green Hundred Road SE15 1RP
 40 Lewes House Friary Estate Green Hundred Road SE15 1RP
 4 Lewes House Friary Estate Green Hundred Road SE15 1RP
 9 Lewes House Friary Estate Green Hundred Road SE15 1RP
 14 Reading House Friary Estate Green Hundred Road SE15 1RS
 13 Reading House Friary Estate Green Hundred Road SE15 1RS
 16 Reading House Friary Estate Green Hundred Road SE15 1RS
 15 Reading House Friary Estate Green Hundred Road SE15 1RS
 10 Reading House Friary Estate Green Hundred Road SE15 1RS
 1 Reading House Friary Estate Green Hundred Road SE15 1RS
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 11 Reading House Friary Estate Green Hundred Road SE15 1RS
 27 Lewes House Friary Estate Green Hundred Road SE15 1RP
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 23 Lewes House Friary Estate Green Hundred Road SE15 1RP
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 25 Lewes House Friary Estate Green Hundred Road SE15 1RP
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 31 Lewes House Friary Estate Green Hundred Road SE15 1RP
 30 Lewes House Friary Estate Green Hundred Road SE15 1RP
 33 Lewes House Friary Estate Green Hundred Road SE15 1RP
 Flat 4 610 Old Kent Road SE15 1JB
 Flat 3 610 Old Kent Road SE15 1JB
 Ground Floor And First Floor 685-689 Old Kent Road SE15 1JS
 658 Old Kent Road London SE15 1JF
 9a Peckham Park Road London SE15 6TR
 41a Ruby Triangle London SE15 1LG
 21b Peckham Park Road London SE15 6TR
 7a Peckham Park Road London SE15 6TR
 First Floor Rear 635 Old Kent Road SE15 1JU
 First Floor Front 635 Old Kent Road SE15 1JU
 Unit 4 Sandgate Trading Estate SE15 1LE
 19a Peckham Park Road London SE15 6TR
 Flat 2 8 Ethnard Road SE15 1RU
 Land At 709 Old Kent Road SE15 1JL
 16-18 Kent Park Industrial Estate Ruby Street SE15 1LR
 Flat B 691-695 Old Kent Road SE15 1JS
 Flat A 691-695 Old Kent Road SE15 1JS
 26 Ethnard Road London SE15 1RU
 12 Pencraig Way London SE15 1SH
 11 Pencraig Way London SE15 1SH
 14 Pencraig Way London SE15 1SH
 13 Pencraig Way London SE15 1SH
 9 Windspoint Drive London SE15 1SD
 8 Windspoint Drive London SE15 1SD
 10 Pencraig Way London SE15 1SH
 1 Pencraig Way London SE15 1SH
 15 Pencraig Way London SE15 1SH
 20 Pencraig Way London SE15 1SH
 2 Pencraig Way London SE15 1SH
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 19 Pencraig Way London SE15 1SH
 18 Pencraig Way London SE15 1SH
 24 Windspoint Drive London SE15 1SD
 23 Windspoint Drive London SE15 1SD
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 20 Windspoint Drive London SE15 1SD
 2 Windspoint Drive London SE15 1SD
 22 Windspoint Drive London SE15 1SD
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 27 Windspoint Drive London SE15 1SD
 5 Windspoint Drive London SE15 1SD
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 7 Windspoint Drive London SE15 1SD
 6 Windspoint Drive London SE15 1SD
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 30 Windspoint Drive London SE15 1SD
 3 Windspoint Drive London SE15 1SD
 672a Old Kent Road London SE15 1JF
 670a Old Kent Road London SE15 1JF
 593-613 Old Kent Road London SE15 1LA
 Flat 1 666 Old Kent Road SE15 1JF
 First Floor And Second Floor Flat 658 Old Kent Road SE15 1JF
 656 Old Kent Road London SE15 1JF
 664 Old Kent Road London SE15 1JF
 662 Old Kent Road London SE15 1JF
 10a Ethnard Road London SE15 1RU
 Flat 1 Lynn House Friary Estate SE15 1RR
 Flat B 27 Ethnard Road SE15 1RY
 Flat 11 Lynn House Friary Estate SE15 1RR
 Flat 10 Lynn House Friary Estate SE15 1RR
 16a Ethnard Road London SE15 1RU
 10b Ethnard Road London SE15 1RU
 Flat A 27 Ethnard Road SE15 1RY
 16b Ethnard Road London SE15 1RU
 28 Pencraig Way London SE15 1SH
 27 Pencraig Way London SE15 1SH
 4 Pencraig Way London SE15 1SH
 3 Pencraig Way London SE15 1SH
 24 Pencraig Way London SE15 1SH
 23 Pencraig Way London SE15 1SH
 26 Pencraig Way London SE15 1SH
 25 Pencraig Way London SE15 1SH
 5 Pencraig Way London SE15 1SH
 620 Old Kent Road London SE15 1JB

32 Lewes House Friary Estate Green Hundred Road SE15 1RP 612 Old Kent Road London SE15 1JB
 36 Reading House Friary Estate Green Hundred Road SE15 1RS 650 Old Kent Road London SE15 1JF
 35 Reading House Friary Estate Green Hundred Road SE15 1RS 630 Old Kent Road London SE15 1JB
 38 Reading House Friary Estate Green Hundred Road SE15 1RS 7 Pencraig Way London SE15 1SH
 37 Reading House Friary Estate Green Hundred Road SE15 1RS 6 Pencraig Way London SE15 1SH
 32 Reading House Friary Estate Green Hundred Road SE15 1RS 9 Pencraig Way London SE15 1SH
 31 Reading House Friary Estate Green Hundred Road SE15 1RS 8 Pencraig Way London SE15 1SH
 34 Reading House Friary Estate Green Hundred Road SE15 1RS 11 Ethnard Road London SE15 1RY
 33 Reading House Friary Estate Green Hundred Road SE15 1RS 1 Ethnard Road London SE15 1RY
 4 Reading House Friary Estate Green Hundred Road SE15 1RS 15 Ethnard Road London SE15 1RY
 9 Reading House Friary Estate Green Hundred Road SE15 1RS 13 Ethnard Road London SE15 1RY
 9a Reading House Friary Estate Green Hundred Road SE15 1RS 66 Ethnard Road London SE15 1RU
 6 Reading House Friary Estate Green Hundred Road SE15 1RS 64 Ethnard Road London SE15 1RU
 5 Reading House Friary Estate Green Hundred Road SE15 1RS 68 Ethnard Road London SE15 1RU
 8 Reading House Friary Estate Green Hundred Road SE15 1RS 17 Ethnard Road London SE15 1RY
 7 Reading House Friary Estate Green Hundred Road SE15 1RS 7 Ethnard Road London SE15 1RY
 21 Reading House Friary Estate Green Hundred Road SE15 1RS 5 Ethnard Road London SE15 1RY
 20 Reading House Friary Estate Green Hundred Road SE15 1RS 29 Ethnard Road London SE15 1SB
 23 Reading House Friary Estate Green Hundred Road SE15 1RS 9 Ethnard Road London SE15 1RY
 22 Reading House Friary Estate Green Hundred Road SE15 1RS 21 Ethnard Road London SE15 1RY
 18 Reading House Friary Estate Green Hundred Road SE15 1RS 19 Ethnard Road London SE15 1RY
 17 Reading House Friary Estate Green Hundred Road SE15 1RS 25 Ethnard Road London SE15 1RY
 2 Reading House Friary Estate Green Hundred Road SE15 1RS 23 Ethnard Road London SE15 1RY
 19 Reading House Friary Estate Green Hundred Road SE15 1RS 4 Ethnard Road London SE15 1RU
 24 Reading House Friary Estate Green Hundred Road SE15 1RS 36a Ethnard Road London SE15 1RU
 3 Reading House Friary Estate Green Hundred Road SE15 1RS 46 Ethnard Road London SE15 1RU
 29 Reading House Friary Estate Green Hundred Road SE15 1RS 44 Ethnard Road London SE15 1RU
 30 Reading House Friary Estate Green Hundred Road SE15 1RS 28 Ethnard Road London SE15 1RU
 30a Reading House Friary Estate Green Hundred Road SE15 1RS 34 Ethnard Road London SE15 1RU
 26 Reading House Friary Estate Green Hundred Road SE15 1RS 32 Ethnard Road London SE15 1RU
 25 Reading House Friary Estate Green Hundred Road SE15 1RS 48 Ethnard Road London SE15 1RU
 28 Reading House Friary Estate Green Hundred Road SE15 1RS 6 Ethnard Road London SE15 1RU
 27 Reading House Friary Estate Green Hundred Road SE15 1RS 58 Ethnard Road London SE15 1RU
 Second Floor Flat 660 Old Kent Road SE15 1JF 62 Ethnard Road London SE15 1RU
 Rear 7 Peckham Park Road SE15 6TR 60 Ethnard Road London SE15 1RU
 9b Peckham Park Road London SE15 6TR 52 Ethnard Road London SE15 1RU
 Second Floor Flat 681 Old Kent Road SE15 1JS 50 Ethnard Road London SE15 1RU
 Flat B 612 Old Kent Road SE15 1JB 56 Ethnard Road London SE15 1RU
 Flat A 612 Old Kent Road SE15 1JB 54 Ethnard Road London SE15 1RU
 Ground Floor Flat 30 Ethnard Road SE15 1RU 75 Ethnard Road London SE15 1SB
 First To Third Floor Flat 656 Old Kent Road SE15 1JF 73 Ethnard Road London SE15 1SB
 Second Floor Flat 11 Peckham Park Road SE15 6TR 10 Windspoint Drive London SE15 1SD
 Basement 635 Old Kent Road SE15 1JU 1 Windspoint Drive London SE15 1SD
 Ground Floor Rear 635 Old Kent Road SE15 1JU 67 Ethnard Road London SE15 1SB
 Ground Floor Front 635 Old Kent Road SE15 1JU 65 Ethnard Road London SE15 1SB
 24-32 Murdock Street London SE15 1LW 71 Ethnard Road London SE15 1SB
 Western Wharf Livesey Place SE15 6SL 69 Ethnard Road London SE15 1SB
 First Floor And Second Floor Flat 624 Old Kent Road SE1 1JB 11 Windspoint Drive London SE15 1SD
 First Floor And Second Floor Flat 3 Ethnard Road SE15 1RY 17 Windspoint Drive London SE15 1SD
 668 Old Kent Road London SE15 1JF 16 Windspoint Drive London SE15 1SD
 660 Old Kent Road London SE15 1JF 19 Windspoint Drive London SE15 1SD
 21a Peckham Park Road London SE15 6TR 18 Windspoint Drive London SE15 1SD
 632a Old Kent Road London SE15 1JB 13 Windspoint Drive London SE15 1SD
 First Floor And Second Floor Flat 620 Old Kent Road SE15 1JB 12 Windspoint Drive London SE15 1SD
 628a Old Kent Road London SE15 1JB 15 Windspoint Drive London SE15 1SD
 First Floor Flat 30 Ethnard Road SE15 1RU 14 Windspoint Drive London SE15 1SD
 First To Third Floors 666 Old Kent Road SE15 1JF 41 Ethnard Road London SE15 1SB
 First To Third Floors 664 Old Kent Road SE15 1JF 39 Ethnard Road London SE15 1SB
 First To Third Floors 652 Old Kent Road SE15 1JF 45 Ethnard Road London SE15 1SB
 First Floor Flat 18 Peckham Park Road SE15 6TW 43 Ethnard Road London SE15 1SB
 16a Peckham Park Road London SE15 6TW 33 Ethnard Road London SE15 1SB
 First To Third Floors 662 Old Kent Road SE15 1JF 31 Ethnard Road London SE15 1SB
 First Floor Flat 11 Peckham Park Road SE15 6TR 37 Ethnard Road London SE15 1SB
 11 Lewes House Friary Estate Green Hundred Road SE15 1RP 35 Ethnard Road London SE15 1SB
 10 Lewes House Friary Estate Green Hundred Road SE15 1RP 47 Ethnard Road London SE15 1SB
 13 Lewes House Friary Estate Green Hundred Road SE15 1RP 59 Ethnard Road London SE15 1SB
 12 Lewes House Friary Estate Green Hundred Road SE15 1RP 57 Ethnard Road London SE15 1SB
 1 Lewes House Friary Estate Green Hundred Road SE15 1RP 63 Ethnard Road London SE15 1SB
 14 Lewes House Friary Estate Green Hundred Road SE15 1RP 61 Ethnard Road London SE15 1SB
 2 Lewes House Friary Estate Green Hundred Road SE15 1RP 51 Ethnard Road London SE15 1SB
 19 Lewes House Friary Estate Green Hundred Road SE15 1RP 49 Ethnard Road London SE15 1SB
 21 Lewes House Friary Estate Green Hundred Road SE15 1RP 55 Ethnard Road London SE15 1SB
 20 Lewes House Friary Estate Green Hundred Road SE15 1RP 53 Ethnard Road London SE15 1SB
 16 Lewes House Friary Estate Green Hundred Road SE15 1RP 1 Cardiff House Peckham Park Road SE15 6TS
 15 Lewes House Friary Estate Green Hundred Road SE15 1RP 6 Canal Grove London SE15 1LB
 18 Lewes House Friary Estate Green Hundred Road SE15 1RP Unit 4 Barnwell Manor Estate PE8 5PL
 17 Lewes House Friary Estate Green Hundred Road SE15 1RP By Email
 Ground Floor 8 Peckham Park Road SE15 6TW 5 Logan Close London E20 1EY

709 Old Kent Road London SE15 1JZ
 High Way Depot Peckham Park Road SE15 6TR
 Ground Floor 10 Peckham Park Road SE15 6TW
 655-657 Old Kent Road London SE15 1JU
 Rear Of 636 Old Kent Road SE15 1JB
 Unit 1 2-12 Ruby Street SE15 1LL
 7-14 Ruby Triangle London SE15 1LG
 Unit 2 2-12 Ruby Street SE15 1LL
 Rubys Cafe Corner Of Ruby Triangle SE15 1LG
 Flat 12 Lynn House Friary Estate SE15 1RR
 Action House 53 Sandgate Street SE15 1LE
 Warehouse 2 14-16 Verney Road SE16 3DZ
 Thamesmead Business Services Ltd 14-16 Verney Road SE16 3DZ
 Southwark Free School Ledbury Hall Pencraig Way SE15 1SH
 7c Peckham Park Road London SE15 6TR
 7b Peckham Park Road London SE15 6TR
 Warehouse 1 14-16 Verney Road SE16 3DZ
 Offices 14-16 Verney Road SE16 3DZ
 6a Peckham Park Road London SE15 6TW
 672 Old Kent Road London SE15 1JF
 Flat 5 670 Old Kent Road SE15 1JF
 Flat 1 Lyons Court SE15 1RT
 Flat 2 670 Old Kent Road SE15 1JF
 Flat 1 670 Old Kent Road SE15 1JF

74 Friary Road London SE15 1PX
 8 Whiston House Goldsmith Row E2 8SJ
 16c Vicarage Road Strood ME24DG
 Flat 2 46 Manor Park SE13 5RL
 Flat 6, Malswick Court 35 Tower Mill Road SE15 6FX
 3 Nigel Road Peckham SE15 4NP
 Rockgrove Way Bermondsey SE16 3UB
 3 Credenhill House Ledbury Strest SE15 1BG
 River Court The Old Mill Office Park GU7 1EZ
 16 Pinwood Road Warrington wa54na
 12 Coopers Road Londno SE1 5HY
 Enterprise House The Crest NW4 2HN
 180 Oxford Street W1D 1NN

Bird In Bush Road London SE15 1QP
 12 Copleston Road London SE15 4AD
 Flat 19 Gisburn House Friary Estate SE15 1SE
 5 Glengall Terrace London SE15 6NW
 By Email SE1 5LP
 60 Dawes House Orb Street SE17 1RD
 By Emails SE1 5LX
 By Email SE1 5LX
 162 Caroline Gardens Asylum Road SE15 2SG
 C/O Southwark Law Centre
 15 Aylesbury Road London SE17 2EQ
 6 Sister Mabels Way London SE15 6UL

Re-consultation: 18/05/2018

APPENDIX 2**Consultation responses received****Internal services**

Economic Development Team
Public Health Team

Statutory and non-statutory organisations

Arqiva - digital communications
Environment Agency
Health & Safety Executive
Historic England
London Underground Limited
Metropolitan Police Service (Designing out Crime)
National Air Traffic Safeguarding Office
Natural England - London Region & South East Region
Thames Water - Development Planning
Transport for London (referable & non-referable app notifications and pre-apps)

Neighbours and local groups

Bird In Bush Road London SE15 1QP
By Email
By Email
By Email
By Email SE1 5LP
By Email SE1 5LX
By Emails SE1 5LX
C/O Southwark Law Centre
Enterprise House The Crest NW4 2HN
Flat 19 Gisburn House Friary Estate SE15 1SE
Flat 2 46 Manor Park SE13 5RL
Flat 6, Malswick Court 35 Tower Mill Road SE15 6FX
River Court The Old Mill Office Park GU7 1EZ
River Court The Old Mill Office Park GU7 1EZ
Rockgrove Way Bermondsey SE16 3UB
Unit 4 Barnwell Manor Estate PE8 5PL
12 Coopers Road Londno SE1 5HY
12 Copleston Road London SE15 4AD
15 Aylesbury Road London SE17 2EQ
16 Pinwood Road Warrington wa54na
16c Vicarage Road Strood ME24DG
162 Caroline Gardens Asylum Road SE15 2SG
180 Oxford Street W1D 1NN
3 Canal Grove London SE15 1LB
3 Credenhill House Ledbury Strest SE15 1BG
3 Nigel Road Peckham SE15 4NP
38 Reading House Friary Estate Green Hundred Road SE15 1RS
5 Glengall Terrace London SE15 6NW
5 Logan Close London E20 1EY
6 Canal Grove London SE15 1LB
6 Canal Grove London SE15 1LB
6 Sister Mabels Way London SE15 6UL
60 Dawes House Orb Street SE17 1RD
7 Canal Grove London SE15 1LB
7 Canal Grove London SE15 1LB
74 Friary Road London SE15 1PX

8 Whiston House Goldsmith Row E2 8SJ
9 Canal Grove London SE15 1LB

RECOMMENDATION

This document shows the case officer's recommended decision for the application referred to below.
This document is not a decision notice for this application.

Applicant	Ruby Triangle Properties Ltd	Reg. Number	18/AP/0897
Application Type	Full Planning Application	Case	TP/2404-1
Recommendation	Grant subject to Legal Agrt, GLA and SoS	Number	

Draft of Decision Notice

Planning Permission was GRANTED for the following development:

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 (plus mezzanine) (+64.735m AOD), 48 Storeys (+170.830m AOD) and 40 storeys (plus mezzanine) (+144.750m AOD), plus single storey basement under part of the site. Development would provide 1,165 residential dwellings (Class C3), flexible retail, business and communal space (Class A1/A2/A3/A4/A5/B1/B8/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.

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.

THE APPLICATION IS ACCOMPANIED BY AN ENVIRONMENTAL STATEMENT submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) regulations 2017. The ES can be viewed on the Council's website. Copies of the ES may be obtained from rubytriangle@glhearn.com at a charge of £20 for CD copy of the full ES, £150 for a hard copy of the ES Main Report (Volume 1), £100 for a hard copy of the ES Drawings and Appendices (Volume 2). There would be no charge for an emailed copy or single hard copy of the Non Technical Summary (Volume 3).

At: RUBY TRIANGLE SITE, LAND BOUNDED BY OLD KENT ROAD, RUBY STREET AND SANDGATE STREET, LONDON SE15 1LG

In accordance with application received on 20/03/2018

and Applicant's Drawing Nos. DRAWINGS:

RTR-FAR-SW-PA-A-03010 SITE PLAN - OWNERSHIP BOUNDARY
 RTR-FAR-SW-PA-A-03011 SITE PLAN - RED LINE
 RTR-FAR-SW-PA-A-03012 SITE DEMOLITION PLAN
 RTR-FAR-SW-PA-A-03100 EXISTING SITEWIDE - GROUND FLOOR PLAN
 RTR-FAR-SW-PA-A-03121 EXISTING SITEWIDE - FIRST FLOOR PLAN
 RTR-FAR-SW-PA-A-03122 EXISTING SITEWIDE - ROOF PLAN
 RTR-FAR-SW-PA-A-03200 EXISTING SITEWIDE - ELEVATIONS
 RTR-FAR-SW-PA-A-03300 EXISTING SITEWIDE - SECTIONS
 RTR-FAR-SW-PA-A-03400 REV A EXISTING SITEWIDE - GROUND FLOOR PLAN - SIL OVERLAY

PES-603121-001-000-GF-00-AS UTILITY IDENTIFICATION DRAWING
 17173LS TOPOGRAPHICAL SURVEY

RTR-FAR-SW-PA-A-05000 PROPOSED SITEWIDE - RED LINE
 RTR-FAR-SW-PA-A-05001 PROPOSED SITEWIDE - BLOCK PLAN
 RTR-FAR-SW-PA-A-05009 REV A PROPOSED SITEWIDE - LEVEL B01 PLAN
 RTR-FAR-SW-PA-A-05010 REV B PROPOSED SITEWIDE - LEVEL 00 PLAN
 RTR-FAR-SW-PA-A-05011 REV A PROPOSED SITEWIDE - LEVEL MEZZ PLAN
 RTR-FAR-SW-PA-A-05101 REV B PROPOSED SITEWIDE - LEVEL 01 PLAN
 RTR-FAR-SW-PA-A-05102 REV B PROPOSED SITEWIDE - LEVEL 02 PLAN
 RTR-FAR-SW-PA-A-05103 REV B PROPOSED SITEWIDE - LEVEL 03 PLAN
 RTR-FAR-SW-PA-A-05110 REV A PROPOSED SITEWIDE - LEVEL 10 PLAN
 RTR-FAR-SW-PA-A-05112 REV A PROPOSED SITEWIDE - LEVEL 12 PLAN
 RTR-FAR-SW-PA-A-05115 REV A PROPOSED SITEWIDE - LEVEL 15 PLAN

RTR-FAR-SW-PA-A-05117 REV A PROPOSED SITEWIDE - LEVEL 17 PLAN
 RTR-FAR-SW-PA-A-05130 REV A PROPOSED SITEWIDE - LEVEL 30 PLAN
 RTR-FAR-SW-PA-A-05140 REV A PROPOSED SITEWIDE - LEVEL 40 PLAN
 RTR-FAR-SW-PA-A-05148 REV A PROPOSED SITEWIDE - LEVEL 48 PLAN
 RTR-FAR-SW-PA-A-05190 REV A PROPOSED SITEWIDE - ROOF PLAN

RTR-FAR-SW-PA-A-05200 PROPOSED SITEWIDE - OLD KENT ROAD ELEVATION
 RTR-FAR-SW-PA-A-05201 REV A PROPOSED SITEWIDE - SANDGATE STREET ELEVATION
 RTR-FAR-SW-PA-A-05202 PROPOSED SITEWIDE - RUBY & HYNDMAN STREET ELEVATION
 RTR-FAR-SW-PA-A-05203 REV A PROPOSED SITEWIDE - COURTYARD BUILDINGS A & B ELEVATION
 RTR-FAR-SW-PA-A-05204 PROPOSED SITEWIDE - COURTYARD BUILDING C ELEVATION

RTR-FAR-SW-PA-A-05300 PROPOSED SITEWIDE - SECTION AA
 RTR-FAR-SW-PA-A-05301 PROPOSED SITEWIDE REV B - SECTION BB
 RTR-FAR-SW-PA-A-05302 PROPOSED SITEWIDE REV B - SECTION CC
 RTR-FAR-SW-PA-A-05303 PROPOSED SITEWIDE REV A - SECTION DD

RTR-FAR-SW-PA-A-05400 PROPOSED SITEWIDE - LEVEL 00 PLAN - SIL OVERLAY

RTR-FAR-A-PA-A-05009 REV A PROPOSED BLOCK A - LEVEL B01
 RTR-FAR-A-PA-A-05010 REV B PROPOSED BLOCK A - LEVEL 00
 RTR-FAR-A-PA-A-05011 REV A PROPOSED BLOCK A - LEVEL MEZZ
 RTR-FAR-A-PA-A-05101 REV A PROPOSED BLOCK A - LEVEL 01
 RTR-FAR-A-PA-A-05102 REV A PROPOSED BLOCK A - LEVEL 02-07
 RTR-FAR-A-PA-A-05108 PROPOSED BLOCK A - LEVEL 08-09
 RTR-FAR-A-PA-A-05110 REV A PROPOSED BLOCK A - LEVEL 10
 RTR-FAR-A-PA-A-05111 REV A PROPOSED BLOCK A - LEVEL 11-14
 RTR-FAR-A-PA-A-05115 PROPOSED BLOCK A - LEVEL 15-16
 RTR-FAR-A-PA-A-05190 REV A PROPOSED BLOCK A - ROOF PLAN

RTR-FAR-A-PA-A-05200 REV A PROPOSED BLOCK A - ELEVATION SOUTH WEST
 RTR-FAR-A-PA-A-05201 REV A PROPOSED BLOCK A - ELEVATION NORTH WEST
 RTR-FAR-A-PA-A-05202 REV A PROPOSED BLOCK A - ELEVATION NORTH EAST
 RTR-FAR-A-PA-A-05203 REV A PROPOSED BLOCK A - ELEVATION SOUTH EAST

RTR-FAR-A-PA-A-05300 REV B PROPOSED BLOCK A - SECTION AA
 RTR-FAR-A-PA-A-05301 REV A PROPOSED BLOCK A - SECTION BB

RTR-FAR-B-PA-A-05009 PROPOSED BLOCK B - LEVEL B01
 RTR-FAR-B-PA-A-05010 REV B PROPOSED BLOCK B- LEVEL 00
 RTR-FAR-B-PA-A-05101 REV B PROPOSED BLOCK B - LEVEL 01
 RTR-FAR-B-PA-A-05102 PROPOSED BLOCK B - LEVEL 02

RTR-FAR-B1-PA-A-05103 REV A PROPOSED BLOCK B1 - LEVEL 03
 RTR-FAR-B1-PA-A-05104 PROPOSED BLOCK B1 - LEVEL 04-05
 RTR-FAR-B1-PA-A-05106 PROPOSED BLOCK B1 - LEVEL 06-08
 RTR-FAR-B1-PA-A-05109 REV A PROPOSED BLOCK B1 - LEVEL 09-11
 RTR-FAR-B1-PA-A-05112 REV B PROPOSED BLOCK B1 - LEVEL 12-14
 RTR-FAR-B1-PA-A-05190 REV B PROPOSED BLOCK B1 - ROOF PLAN

RTR-FAR-B2-PA-A-05103 REV B PROPOSED BLOCK B2- LEVEL 03-06
 RTR-FAR-B2-PA-A-05104 PROPOSED BLOCK B2- LEVEL 04-06
 RTR-FAR-B2-PA-A-05107 REV A PROPOSED BLOCK B2 - LEVEL 07-13
 RTR-FAR-B2-PA-A-05114 REV A PROPOSED BLOCK B2 - LEVEL 14
 RTR-FAR-B2-PA-A-05115 REV A PROPOSED BLOCK B2 - LEVEL 15
 RTR-FAR-B2-PA-A-05116 REV A PROPOSED BLOCK B2 - LEVEL 16-24 & 26-31
 RTR-FAR-B2-PA-A-05125 REV A PROPOSED BLOCK B2 - LEVEL 25
 RTR-FAR-B2-PA-A-05132 REV A PROPOSED BLOCK B2 - LEVEL 32-33
 RTR-FAR-B2-PA-A-05134 REV A PROPOSED BLOCK B2 - LEVEL 34-39
 RTR-FAR-B2-PA-A-05140 REV A PROPOSED BLOCK B2 - LEVEL 40-46
 RTR-FAR-B2-PA-A-05147 REV B PROPOSED BLOCK B2 - LEVEL 47
 RTR-FAR-B2-PA-A-05190 REV B PROPOSED BLOCK B2 - ROOF PLAN

RTR-FAR-B-PA-A-05200 REV B PROPOSED BLOCK B - ELEVATION NORTH & NORTH WEST
 RTR-FAR-B-PA-A-05201 REV C PROPOSED BLOCK B - ELEVATION EAST
 RTR-FAR-B-PA-A-05202 REV B PROPOSED BLOCK B - ELEVATION SOUTH
 RTR-FAR-B-PA-A-05203 REV B PROPOSED BLOCK B - ELEVATION SOUTH WEST

RTR-FAR-B-PA-A-05300 REV B PROPOSED BLOCK B - SECTION AA
 RTR-FAR-B-PA-A-05301 REV A PROPOSED BLOCK B - SECTION BB
 RTR-FAR-B-PA-A-05302 REV B PROPOSED BLOCK B - SECTION CC

RTR-FAR-C-PA-A-05009 PROPOSED BLOCK C - LEVEL B01
 RTR-FAR-C-PA-A-05010 REV C PROPOSED BLOCK C - LEVEL 00
 RTR-FAR-C-PA-A-05011 REV A PROPOSED BLOCK C - LEVEL MEZZ

RTR-FAR-C1-PA-A-05101 REV B PROPOSED BLOCK C1 - LEVEL 01
 RTR-FAR-C1-PA-A-05102 REV A PROPOSED BLOCK C1- LEVEL 02-11
 RTR-FAR-C1-PA-A-05112 REV A PROPOSED BLOCK C1 - LEVEL 12
 RTR-FAR-C1-PA-A-05113 REV A PROPOSED BLOCK C1 - LEVEL 13-24
 RTR-FAR-C1-PA-A-05125 REV A PROPOSED BLOCK C1- LEVEL 25
 RTR-FAR-C1-PA-A-05126 REV A PROPOSED BLOCK C1 - LEVEL 26-34
 RTR-FAR-C1-PA-A-05135 REV A PROPOSED BLOCK C1 - LEVEL 35-38
 RTR-FAR-C1-PA-A-05139 REV A PROPOSED BLOCK C1 - LEVEL 39
 RTR-FAR-C1-PA-A-05190 REV A PROPOSED BLOCK C1 - ROOF PLAN

RTR-FAR-C2-PA-A-05101 REV B PROPOSED BLOCK C2 - LEVEL 01
 RTR-FAR-C2-PA-A-05102 REV A PROPOSED BLOCK C2 - LEVEL 02-03
 RTR-FAR-C2-PA-A-05104 REV A PROPOSED BLOCK C2 - LEVEL 04-05
 RTR-FAR-C2-PA-A-05106 REV A PROPOSED BLOCK C2 - LEVEL 06
 RTR-FAR-C2-PA-A-05107 REV A PROPOSED BLOCK C2 - LEVEL 07-11
 RTR-FAR-C2-PA-A-05112 REV B PROPOSED BLOCK C2 - LEVEL 12
 RTR-FAR-C2-PA-A-05113 REV B PROPOSED BLOCK C2 - LEVEL 13-16
 RTR-FAR-C2-PA-A-05117 REV A PROPOSED BLOCK C2 - LEVEL 17
 RTR-FAR-C2-PA-A-05118 REV B PROPOSED BLOCK C2 - LEVEL 18-26
 RTR-FAR-C2-PA-A-05127 REV B PROPOSED BLOCK C2 - LEVEL 27-29
 RTR-FAR-C2-PA-A-05190 REV A PROPOSED BLOCK C2 - ROOF PLAN

RTR-FAR-C-PA-A-05200 REV A PROPOSED BLOCK C - ELEVATION EAST
 RTR-FAR-C-PA-A-05201 REV A PROPOSED BLOCK C - ELEVATION SOUTH
 RTR-FAR-C-PA-A-05202 REV B PROPOSED BLOCK C - ELEVATION WEST
 RTR-FAR-C-PA-A-05203 REV A PROPOSED BLOCK C - ELEVATION NORTH

RTR-FAR-C-PA-A-05300 REV B PROPOSED BLOCK C - SECTION AA
 RTR-FAR-C-PA-A-05301 REV A PROPOSED BLOCK C - SECTION BB
 RTR-FAR-C-PA-A-05302 REV A PROPOSED BLOCK C - SECTION CC & DD
 RTR-FAR-C-PA-A-05303 REV A PROPOSED BLOCK C - SECTION EE

RTR-FAR-D-PA-A-05010 REV A 639 to 641 OKR - EXISTING FLOOR PLANS, SECTIONS & ELEVATIONS

RTR-FAR-D-PA-A-05200 REV A 639 to 641 OKR - PROPOSED FLOOR PLANS, SECTIONS & ELEVATIONS

RTR-FAR-SW-PA-A-09001 BLOCK A & B1 - TYPICAL FACADE DETAIL: MIDDLE
 RTR-FAR-SW-PA-A-09002 BLOCK C2 - TYPICAL FACADE DETAIL: MIDDLE
 RTR-FAR-SW-PA-A-09003 BLOCK B2 & C1 - TYPICAL FACADE DETAIL: MIDDLE

RTR-FAR-SW-PA-A-09011 BLOCK A & B1- TYPICAL FACADE DETAIL: BASE
 RTR-FAR-SW-PA-A-09012 BLOCK C2- TYPICAL FACADE DETAIL: BASE
 RTR-FAR-SW-PA-A-09013 BLOCK B2 & C1 - TYPICAL FACADE DETAIL: BASE

RTR-FAR-SW-PA-A-09021 BLOCK A & B1 - TYPICAL FACADE DETAIL: TOP
 RTR-FAR-SW-PA-A-09022 BLOCK C2- TYPICAL FACADE DETAIL: TOP
 RTR-FAR-SW-PA-A-09023 BLOCK B2 & C1 - TYPICAL FACADE DETAIL: TOP
 RTR-FAR-SW-PA-A-09031 BLOCK A - UPPER PARAPET DENTAL DETAIL

ENVORONMNTAL STATEMENT:

ENVIRONMENTAL STATEMENT: VOLUME 1 MAIN REPORT, VOLUME 2 APPENDICES, VOLUME 3 NON TECHNICAL SUMMARY

ENVIRONMENTAL STATEMENT ADDENDUM VOLUME 1 MAIN REPORT, VOLUME 2 APPENDICES,

ENVIRONMENTAL STATEMENT SUPPLEMENTARY STATEMENT

DOCUMENTS:

DESIGN AND ACCESS STATEMENT (REV B), DRAFT CONSTRUCTION MANAGEMENT PLAN, RETAIL ASSESSMENT, PRELIMINARY ECOLOGICAL ASSESSMENT AND ECOLOGY ENHANCEMENT STRATEGY, STATEMENT OF COMMUNITY INVOLVEMENT, WASTE MANAGEMENT STRATEGY, COMMERCIAL ACCOMMODATION STRATEGY REPORT, ACOUSTIC PERFORMANCE DESIGN NOTE, STATEMENT, HIGH LEVEL SUMMARY OF FIRE STRATEGY, DELIVERY SERVICE PLAN REV 1, WRITTEN SCHEME OF INVESTIGATION FOR A GEOARCHAEOLOGICAL WATCHING BRIEF, WRITTEN SCHEME OF INVESTIGATION FOR ARCHAEOLOGICAL EVALUATION, ARCHAEOLOGICAL EVALUATION REPORT, BAT EMERGENCE SURVEY, ENERGY STATEMENT, PLANNING STATEMENT (VERSION 3), SPECIFICATION A AFORDABLE BUSINESS SPACE (REV 03), CYCLE HUB PROPOSAL, SPECIFICATION B LIGHT INDUSTRIAN SPACE (REV 02), EXISTING USE SCHEDULE, PRELIMINARY ECOLOGICAL ASSESSMENT AND ECOLOGY ENHANCEMENT STRATEGY, WASTE MANAGEMENT STRATEGY (REV 1), ENERGY STRATEGY (REV 2)

Subject to the following fifty-one conditions:**Time limit for implementing this permission and the approved plans**

1 Approved Plans

The development hereby permitted shall not be carried out otherwise than in accordance with the following approved plans:

RTR-FAR-SW-PA-A-03010 SITE PLAN - OWNERSHIP BOUNDARY
 RTR-FAR-SW-PA-A-03011 SITE PLAN - RED LINE
 RTR-FAR-SW-PA-A-03012 SITE DEMOLITION PLAN

RTR-FAR-SW-PA-A-05000 PROPOSED SITEWIDE - RED LINE
 RTR-FAR-SW-PA-A-05001 PROPOSED SITEWIDE - BLOCK PLAN
 RTR-FAR-SW-PA-A-05009 REV A PROPOSED SITEWIDE - LEVEL B01 PLAN
 RTR-FAR-SW-PA-A-05010 REV B PROPOSED SITEWIDE - LEVEL 00 PLAN
 RTR-FAR-SW-PA-A-05011 REV A PROPOSED SITEWIDE - LEVEL MEZZ PLAN
 RTR-FAR-SW-PA-A-05101 REV B PROPOSED SITEWIDE - LEVEL 01 PLAN
 RTR-FAR-SW-PA-A-05102 REV B PROPOSED SITEWIDE - LEVEL 02 PLAN
 RTR-FAR-SW-PA-A-05103 REV B PROPOSED SITEWIDE - LEVEL 03 PLAN
 RTR-FAR-SW-PA-A-05110 REV A PROPOSED SITEWIDE - LEVEL 10 PLAN
 RTR-FAR-SW-PA-A-05112 REV A PROPOSED SITEWIDE - LEVEL 12 PLAN
 RTR-FAR-SW-PA-A-05115 REV A PROPOSED SITEWIDE - LEVEL 15 PLAN
 RTR-FAR-SW-PA-A-05117 REV A PROPOSED SITEWIDE - LEVEL 17 PLAN
 RTR-FAR-SW-PA-A-05130 REV A PROPOSED SITEWIDE - LEVEL 30 PLAN
 RTR-FAR-SW-PA-A-05140 REV A PROPOSED SITEWIDE - LEVEL 40 PLAN
 RTR-FAR-SW-PA-A-05148 REV A PROPOSED SITEWIDE - LEVEL 48 PLAN
 RTR-FAR-SW-PA-A-05190 REV A PROPOSED SITEWIDE - ROOF PLAN

RTR-FAR-SW-PA-A-05200 PROPOSED SITEWIDE - OLD KENT ROAD ELEVATION
 RTR-FAR-SW-PA-A-05201 REV A PROPOSED SITEWIDE - SANDGATE STREET ELEVATION
 RTR-FAR-SW-PA-A-05202 PROPOSED SITEWIDE - RUBY & HYNDMAN STREET ELEVATION
 RTR-FAR-SW-PA-A-05203 REV A PROPOSED SITEWIDE - COURTYARD BUILINGS A & B ELEVATION
 RTR-FAR-SW-PA-A-05204 PROPOSED SITEWIDE - COURTYARD BUILDING C ELEVATION

RTR-FAR-SW-PA-A-05300 PROPOSED SITEWIDE - SECTION AA
 RTR-FAR-SW-PA-A-05301 PROPOSED SITEWIDE REV B - SECTION BB
 RTR-FAR-SW-PA-A-05302 PROPOSED SITEWIDE REV B - SECTION CC
 RTR-FAR-SW-PA-A-05303 PROPOSED SITEWIDE REV A - SECTION DD

RTR-FAR-SW-PA-A-05400 PROPOSED SITEWIDE - LEVEL 00 PLAN - SIL OVERLAY

RTR-FAR-A-PA-A-05009 REV A PROPOSED BLOCK A - LEVEL B01
 RTR-FAR-A-PA-A-05010 REV B PROPOSED BLOCK A - LEVEL 00
 RTR-FAR-A-PA-A-05011 REV A PROPOSED BLOCK A - LEVEL MEZZ
 RTR-FAR-A-PA-A-05101 REV A PROPOSED BLOCK A - LEVEL 01
 RTR-FAR-A-PA-A-05102 REV A PROPOSED BLOCK A - LEVEL 02-07
 RTR-FAR-A-PA-A-05108 PROPOSED BLOCK A - LEVEL 08-09
 RTR-FAR-A-PA-A-05110 REV A PROPOSED BLOCK A - LEVEL 10
 RTR-FAR-A-PA-A-05111 REV A PROPOSED BLOCK A - LEVEL 11-14
 RTR-FAR-A-PA-A-05115 PROPOSED BLOCK A - LEVEL 15-16
 RTR-FAR-A-PA-A-05190 REV A PROPOSED BLOCK A - ROOF PLAN

RTR-FAR-A-PA-A-05200 REV A PROPOSED BLOCK A - ELEVATION SOUTH WEST
RTR-FAR-A-PA-A-05201 REV A PROPOSED BLOCK A - ELEVATION NORTH WEST
RTR-FAR-A-PA-A-05202 REV A PROPOSED BLOCK A - ELEVATION NORTH EAST
RTR-FAR-A-PA-A-05203 REV A PROPOSED BLOCK A - ELEVATION SOUTH EAST

RTR-FAR-A-PA-A-05300 REV B PROPOSED BLOCK A - SECTION AA
RTR-FAR-A-PA-A-05301 REV A PROPOSED BLOCK A - SECTION BB

RTR-FAR-B-PA-A-05009 PROPOSED BLOCK B - LEVEL B01
RTR-FAR-B-PA-A-05010 REV B PROPOSED BLOCK B- LEVEL 00
RTR-FAR-B-PA-A-05101 REV B PROPOSED BLOCK B - LEVEL 01
RTR-FAR-B-PA-A-05102 PROPOSED BLOCK B - LEVEL 02

RTR-FAR-B1-PA-A-05103 REV A PROPOSED BLOCK B1 - LEVEL 03
RTR-FAR-B1-PA-A-05104 PROPOSED BLOCK B1 - LEVEL 04-05
RTR-FAR-B1-PA-A-05106 PROPOSED BLOCK B1 - LEVEL 06-08
RTR-FAR-B1-PA-A-05109 REV A PROPOSED BLOCK B1 - LEVEL 09-11
RTR-FAR-B1-PA-A-05112 REV B PROPOSED BLOCK B1 - LEVEL 12-14
RTR-FAR-B1-PA-A-05190 REV B PROPOSED BLOCK B1 - ROOF PLAN

RTR-FAR-B2-PA-A-05103 REV B PROPOSED BLOCK B2- LEVEL 03-06
RTR-FAR-B2-PA-A-05104 PROPOSED BLOCK B2- LEVEL 04-06
RTR-FAR-B2-PA-A-05107 REV A PROPOSED BLOCK B2 - LEVEL 07-13
RTR-FAR-B2-PA-A-05114 REV A PROPOSED BLOCK B2 - LEVEL 14
RTR-FAR-B2-PA-A-05115 REV A PROPOSED BLOCK B2 - LEVEL 15
RTR-FAR-B2-PA-A-05116 REV A PROPOSED BLOCK B2 - LEVEL 16-24 & 26-31
RTR-FAR-B2-PA-A-05125 REV A PROPOSED BLOCK B2 - LEVEL 25
RTR-FAR-B2-PA-A-05132 REV A PROPOSED BLOCK B2 - LEVEL 32-33
RTR-FAR-B2-PA-A-05134 REV A PROPOSED BLOCK B2 - LEVEL 34-39
RTR-FAR-B2-PA-A-05140 REV A PROPOSED BLOCK B2 - LEVEL 40-46
RTR-FAR-B2-PA-A-05147 REV B PROPOSED BLOCK B2 - LEVEL 47
RTR-FAR-B2-PA-A-05190 REV B PROPOSED BLOCK B2 - ROOF PLAN

RTR-FAR-B-PA-A-05200 REV B PROPOSED BLOCK B - ELEVATION NORTH & NORTH WEST
RTR-FAR-B-PA-A-05201 REV C PROPOSED BLOCK B - ELEVATION EAST
RTR-FAR-B-PA-A-05202 REV B PROPOSED BLOCK B - ELEVATION SOUTH
RTR-FAR-B-PA-A-05203 REV B PROPOSED BLOCK B - ELEVATION SOUTH WEST

RTR-FAR-B-PA-A-05300 REV B PROPOSED BLOCK B - SECTION AA
RTR-FAR-B-PA-A-05301 REV A PROPOSED BLOCK B - SECTION BB
RTR-FAR-B-PA-A-05302 REV B PROPOSED BLOCK B - SECTION CC

RTR-FAR-C-PA-A-05009 PROPOSED BLOCK C - LEVEL B01
RTR-FAR-C-PA-A-05010 REV C PROPOSED BLOCK C - LEVEL 00
RTR-FAR-C-PA-A-05011 REV A PROPOSED BLOCK C - LEVEL MEZZ

RTR-FAR-C1-PA-A-05101 REV B PROPOSED BLOCK C1 - LEVEL 01
RTR-FAR-C1-PA-A-05102 REV A PROPOSED BLOCK C1- LEVEL 02-11
RTR-FAR-C1-PA-A-05112 REV A PROPOSED BLOCK C1 - LEVEL 12
RTR-FAR-C1-PA-A-05113 REV A PROPOSED BLOCK C1 - LEVEL 13-24
RTR-FAR-C1-PA-A-05125 REV A PROPOSED BLOCK C1- LEVEL 25
RTR-FAR-C1-PA-A-05126 REV A PROPOSED BLOCK C1 - LEVEL 26-34
RTR-FAR-C1-PA-A-05135 REV A PROPOSED BLOCK C1 - LEVEL 35-38
RTR-FAR-C1-PA-A-05139 REV A PROPOSED BLOCK C1 - LEVEL 39
RTR-FAR-C1-PA-A-05190 REV A PROPOSED BLOCK C1 - ROOF PLAN

RTR-FAR-C2-PA-A-05101 REV B PROPOSED BLOCK C2 - LEVEL 01
RTR-FAR-C2-PA-A-05102 REV A PROPOSED BLOCK C2 - LEVEL 02-03
RTR-FAR-C2-PA-A-05104 REV A PROPOSED BLOCK C2 - LEVEL 04-05
RTR-FAR-C2-PA-A-05106 REV A PROPOSED BLOCK C2 - LEVEL 06
RTR-FAR-C2-PA-A-05107 REV A PROPOSED BLOCK C2 - LEVEL 07-11
RTR-FAR-C2-PA-A-05112 REV B PROPOSED BLOCK C2 - LEVEL 12
RTR-FAR-C2-PA-A-05113 REV B PROPOSED BLOCK C2 - LEVEL 13-16
RTR-FAR-C2-PA-A-05117 REV A PROPOSED BLOCK C2 - LEVEL 17
RTR-FAR-C2-PA-A-05118 REV B PROPOSED BLOCK C2 - LEVEL 18-26
RTR-FAR-C2-PA-A-05127 REV B PROPOSED BLOCK C2 - LEVEL 27-29

RTR-FAR-C2-PA-A-05190 REV A PROPOSED BLOCK C2 - ROOF PLAN

RTR-FAR-C-PA-A-05200 REV A PROPOSED BLOCK C - ELEVATION EAST
 RTR-FAR-C-PA-A-05201 REV A PROPOSED BLOCK C - ELEVATION SOUTH
 RTR-FAR-C-PA-A-05202 REV B PROPOSED BLOCK C - ELEVATION WEST
 RTR-FAR-C-PA-A-05203 REV A PROPOSED BLOCK C - ELEVATION NORTH

RTR-FAR-C-PA-A-05300 REV B PROPOSED BLOCK C - SECTION AA
 RTR-FAR-C-PA-A-05301 REV A PROPOSED BLOCK C - SECTION BB
 RTR-FAR-C-PA-A-05302 REV A PROPOSED BLOCK C - SECTION CC & DD
 RTR-FAR-C-PA-A-05303 REV A PROPOSED BLOCK C - SECTION EE

RTR-FAR-D-PA-A-05010 REV A 639 to 641 OKR - EXISTING FLOOR PLANS, SECTIONS & ELEVATIONS

RTR-FAR-D-PA-A-05200 REV A 639 to 641 OKR - PROPOSED FLOOR PLANS, SECTIONS & ELEVATIONS

RTR-FAR-SW-PA-A-09001 BLOCK A & B1 - TYPICAL FACADE DETAIL: MIDDLE
 RTR-FAR-SW-PA-A-09002 BLOCK C2 - TYPICAL FACADE DETAIL: MIDDLE
 RTR-FAR-SW-PA-A-09003 BLOCK B2 & C1 - TYPICAL FACADE DETAIL: MIDDLE

RTR-FAR-SW-PA-A-09011 BLOCK A & B1- TYPICAL FACADE DETAIL: BASE
 RTR-FAR-SW-PA-A-09012 BLOCK C2- TYPICAL FACADE DETAIL: BASE
 RTR-FAR-SW-PA-A-09013 BLOCK B2 & C1 - TYPICAL FACADE DETAIL: BASE

RTR-FAR-SW-PA-A-09021 BLOCK A & B1 - TYPICAL FACADE DETAIL: TOP
 RTR-FAR-SW-PA-A-09022 BLOCK C2- TYPICAL FACADE DETAIL: TOP
 RTR-FAR-SW-PA-A-09023 BLOCK B2 & C1 - TYPICAL FACADE DETAIL: TOP
 RTR-FAR-SW-PA-A-09031 BLOCK A - UPPER PARAPET DENTAL DETAIL

Reason:

For the avoidance of doubt and in the interests of proper planning.

2 Time Limit

The development hereby permitted shall be begun before the end of three years from the date of this permission.

Reason:

As required by Section 91 of the Town and Country Planning Act 1990 as amended.

Pre-commencement condition(s) - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before any work in connection with implementing this permission is commenced.

3 Wheelchair Units

Prior to the commencement of any works above grade, the applicant shall submit written confirmation from the appointed building control body that the specifications for each dwelling identified in the detailed construction plans meet the standard of the Approved Document M of the Building Regulations (2015) required in the schedule below and as corresponding to the approved floor plans. The development shall be carried out in accordance with the details thereby approved by the appointed building control body.

M4 (Category 2) 'accessible and adaptable':- 1,032 units - (478 x 1 bed, 434 x 2 bed and 120 x 3 bed)

M4 (Category 3) 'wheelchair user dwellings':- 120 units (46 x 1 bed, 61 x 2 bed, 13 x 3 bed)

Reason:

In order to ensure the development complies with Core Strategy 2011 Strategic Policy 5 (Providing new homes) and London Plan 2016 Policy 3.8 (Housing choice).

4 Flood Resistance and Resilience Report

The basement and ground levels of the site are at residual flood risk from the River Thames, and some surface water flood risk. A Flood Resistance and Resilience Report recommending solutions should be submitted to the

local planning authority and approved in writing prior to the beginning of works on site. The report should be proportionate and risk based in terms of predicted flood risks to the planned development (including predicted levels for the years provided in EA Product 4). Construction should be carried out in line with the recommendations of the report.

Reason:

To minimise potential damage to property from flood events from these sources.

5 External lighting

Details of any external lighting to external areas surrounding the buildings shall be submitted to and approved by the Local Planning Authority in writing before any such lighting is installed. The development shall not be carried out otherwise in accordance with any such approval given.

Reason:

In order that the Council may be satisfied as to the details of the development in the interest of the visual amenity of the area, the safety and security of persons using the area and the amenity and privacy of adjoining occupiers in accordance with The National Planning Policy Framework 2018, Strategic Policy 12 Design and Conservation and Strategic Policy 13 High environmental standards of The Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity and 3.14 Designing out crime of the Southwark Plan 2007.

6 Secure By Design Application

Prior to works commencing, evidence of the submission of an application for Secure By Design Accreditation from the Metropolitan Police, along with details of security measures proposed, shall be submitted and approved in writing by the Local Planning Authority.

Reason:

In pursuance of the Local Planning Authority's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention in accordance with The National Planning Policy Framework 2018, Strategic Policy 12 - Design and Conservation of The Core Strategy 2011 and Saved Policy 3.14 Designing out crime of the Southwark Plan 2007.

7 Water Management Strategy

Before any work hereby authorised begins, an integrated water management strategy detailing, what infrastructure is required, where it is required, when it is required (phasing) and how it will be delivered, shall be submitted to and approved by, the Local Planning Authority in consultation with the water undertaker. The development shall be occupied in line with the recommendations of the strategy.

Reason:

The development may lead to no water and or significant environment impacts an Integrated water management strategy is required to ensure that sufficient capacity is made available to cater for the new development and in order to avoid adverse environmental impact upon the community.

8 Site Investigation and Remediation

Prior to the commencement of development approved by this planning permission, the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

- 1) A site investigation scheme, based on the PRA, to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site;
- 2) The results of the site investigation and detailed risk assessment referred to in (1) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken; and
- 3) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (2) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express consent of the local planning authority. The scheme shall be implemented as approved.

Reason:

For the protection of Controlled Waters. The site is located over a Secondary Aquifer and it is understood that the site may be affected by historic contamination.

9 Construction Logistics Plan

Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall identify all efficiency and sustainability measures that will be taken during construction of this development. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority. Further information and guidance is available at <http://content.tfl.gov.uk/construction-logistics-plan-guidance-for-developers.pdf>

Reason:

To ensure that construction works do not have an adverse impact on the transport network in accordance with London Plan Policy 6.14 and to minimise the impact of construction activities on local air quality in accordance with London Plan Policy 7.14.

10 Contamination

a) Prior to the commencement of any development, a phase 2 intrusive site investigation and associated risk assessment shall be completed in order to assess the nature and extent of any contamination on the site, whether or not it originates on the site.

b) In the event that contamination is present, a detailed remediation strategy to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment shall be prepared and submitted to the Local Planning Authority for approval in writing. The approved remediation scheme (if required) shall be carried out in accordance with its terms prior to the commencement of development, other than works required to carry out remediation and demolition works, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority shall be given two weeks written notification of commencement of the remediation scheme works.

c) Following the completion of the works and measures identified in the approved remediation strategy, a verification report shall be submitted to the Local Planning Authority providing evidence that all works required by the remediation strategy have been completed.

d) In the event that potential contamination is found at any time when carrying out the approved development that was not previously identified, it shall be reported in writing immediately to the Local Planning Authority, and a scheme of investigation and risk assessment, a remediation strategy and verification report (if required) shall be submitted to the Local Planning Authority for approval in writing, in accordance with a-c above.

Reason:

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with Saved Policy 3.2 'Protection of amenity' of the Southwark Plan (2007), Strategic Policy 13' High environmental standards' of the Core Strategy (2011) and the National Planning Policy Framework 2018.

11 Tree Planting

Prior to works commencing, and subject to Section 278 negotiations with LBs and TfL, full details of all proposed tree planting including 17 on Old Kent Road, 10 on Ruby Street, 14 on Sandgate Street and 32 elsewhere within the site at grade shall be submitted to and approved in writing by the Local Planning Authority. This will include tree pit cross sections, planting and maintenance specifications, use of guards or other protective measures and confirmation of location, species, sizes, nursery stock type, supplier and defect period. All tree planting shall be carried out in accordance with those details and at those times. Planting shall comply with BS5837: Trees in relation to demolition, design and construction (2012) and BS: 4428 Code of practice for general landscaping operations.

If within a period of five years from the date of the planting of any tree that tree, or any tree planted in replacement for it, is removed, uprooted or destroyed or dies, or becomes, in the opinion of the local planning authority, seriously damaged or defective, another tree of the same species and size as that originally planted shall be planted at the same place in the first suitable planting season, unless the local planning authority gives its written consent to any variation.

Reason:

To ensure the proposed development will preserve and enhance the visual amenities of the locality and is designed for the maximum benefit of local biodiversity, in addition to the attenuation of surface water runoff in accordance with The National Planning Policy Framework 2018 Parts 8, 12 & 15 and policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental

standards, and Saved Policies of The Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity.

12 Basement Impact Assessment

No works shall commence until suitable investigations are undertaken to determine the ground and groundwater conditions (including levels) at the site and a basement impact assessment is submitted to and approved in writing by the Local Planning Authority. This should include groundwater flood risk mitigation measures as required, with the measures constructed to the approved details. Specifically we would like the BIA to assess if the lowest level of the basement will be above, or below the groundwater levels recorded from the ground investigations. We would like the applicant to consider fluctuations in groundwater levels and the risks this can pose to the site. We would also like them to propose mitigation measures. Further guidance on preparing BIA can be found in appendix to our SFRA 2016 here: <https://www.southwark.gov.uk/environment/flood-risk-management/strategic-flood-risk-assessment-sfra?chapter=2>

Reason:

To minimise the potential for the site to contribute to changes in groundwater conditions and any subsequent flooding in accordance with the Southwark Strategic Flood Risk Assessment (2016).

13 Foundation Design

Before any work hereby authorised begins, a detailed scheme showing the complete scope and arrangement of the foundation design and all ground works shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order that details of the foundations, ground works and all below ground impacts of the proposed development are detailed and accord with the programme of archaeological mitigation works to ensure the preservation of archaeological remains by record and in situ in accordance with Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and the National Planning Policy Framework 2018.

14 Archaeological Mitigation

Before any work hereby authorised begins, the applicant shall secure the implementation of a programme of archaeological mitigation works in accordance with a written scheme of investigation, which shall be submitted to and approved in writing by the Local Planning Authority.

Reason:

In order that the details of the programme of works for the archaeological mitigation are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site in accordance with Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and the National Planning Policy Framework 2018.

15 Archaeological Evaluation

Before any work hereby authorised begins, the applicant shall secure the implementation of a programme of archaeological evaluation works in accordance with a written scheme of investigation shall be submitted to and approved in writing by the Local Planning Authority.

Reason:

In order that the applicants supply the necessary archaeological information to ensure suitable mitigation measures and/or foundation design proposals be presented in accordance with Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and the National Planning Policy Framework 2018.

16 Health Impact Assessment

Prior to the commencement of any works hereby permitted, a Health Impact Assessment (HIA) shall be submitted to and approved by the Local Planning Authority in writing. Any mitigation identified as necessary in the HIA shall be implemented prior to the associated works being carried out.

Reason:

In order that the Council may be satisfied as to the impacts of the development on the health of the local community, in accordance with The National Planning Policy Framework 2018 Part 8, Policy 3.2 of the London Plan 2016 and Strategic Policies 2 - Sustainable Transport, 4 - Places for Learning, Enjoyment and Healthy Lifestyles and 13 - High Environmental Standards, of The Core Strategy 2011

17 Final Overheating Assessment

Prior to commencement of any works above grade, a final overheating assessment using dynamic thermal modelling to demonstrate compliance with the CIBSE overheating criteria shall be submitted to the Local Authority for approval in writing. Details shall be provided of any mitigation measures necessary in order to reduce the risk of overheating to residential units to an acceptable level and the development shall not be carried out otherwise than in accordance with any approval given.

Reason:

In order to ensure that residential accommodation is of sufficient quality and that the risk of overheating is satisfactorily addressed in accordance with London Plan Policies 5.2 and 5.9, Core Strategy Strategic Policy 12 and Saved Southwark Plan policy 4.2 and guidance in the National Planning Policy Framework 2018

18 Bug, Bat and Bird Boxes

Details of the following bug, bird and bat nesting boxes shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the development hereby granted permission.

No less than 5 to 10 bug boxes, 5 to 15 integrated bat boxes and 5 to 10 integrated bird nesting boxes shall be provided and the details shall include the exact location, specification and design of the habitats. The boxes shall be installed within the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained.

The nesting boxes shall be installed strictly in accordance with the details so approved, shall be maintained as such thereafter.

Discharge of this condition will be granted on receiving the details of the nest/roost features and mapped locations and Southwark Council agreeing the submitted plans, and once the nest/roost features are installed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the nest/roost features have been installed to the agreed specification.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with policies: 7.19 of the London Plan 2016, Policy 3.28 of the Southwark Plan and Strategic Policy 11 of the Southwark Core Strategy.

Commencement of works above grade - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before any work above grade is commenced. The term 'above grade' here means any works above ground level.

19 Mock Ups

Prior to the commencement of works on Blocks B and C, full-scale mock-ups of the façades of buildings B1, C21 and C2 to be used in the carrying out of this permission shall be presented on site and approved in writing by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with any such approval given. These samples must demonstrate how the proposal makes a contextual response in terms of materials to be used.

Reason:

In order that the Local Planning Authority may be satisfied as to the design and details in accordance with the National Planning Policy Framework 2018, Policy 7.7 of the London Plan 2016, Strategic Policy SP12 Design & Conservation - of the Core Strategy (2011) and Saved Policies: 3.12 Quality in Design; 3.13 Urban Design; and 3.20 Tall buildings of The Southwark Plan (2007).

20 Telecommunications

Before any above grade work hereby authorised begins, details of how the impact of the development on television, radio and other telecommunications services will be assessed, the method and results of surveys carried out, and the measures to be taken to rectify any problems identified shall be submitted to and approved in writing by the Local Planning Authority. The premises shall not be occupied until any such mitigation measures as

may have been approved have been implemented.

Reason:

In order to ensure that any adverse impacts of the development on reception of residential properties is identified and resolved satisfactorily in accordance with The National Planning Policy Framework 2018, Strategic Policy 13 - High environmental standards of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan 2007.

21 Detail Drawings

Prior to commencement of works above grade on any block (A, B or C) hereby authorised, detail drawings at a scale of 1:5 or 1:10 through:

- i) all facade variations; and
- ii) shop fronts and residential entrances; and
- iii) all parapets and roof edges; and
- iv) all balcony details; and
- v) heads, cills and jambs of all openings

to be used in the carrying out of this permission shall be submitted to and approved by the Local Planning Authority in writing. The development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order that the Local Planning Authority may be satisfied as to the quality of the design and details in accordance with Saved Policies: 3.12 Quality in Design; 3.13 Urban Design; of The Southwark Plan (UDP) July 2007.

22 Material Samples

Prior to the commencement of works above grade on any of the Blocks (A, B or C) hereby authorised, samples of all external facing materials to be used in the carrying out of this permission shall be presented on site to the Local Planning Authority and approved in writing. The development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order that the Local Planning Authority may be satisfied that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing in accordance with Saved Policies: 3.11 Efficient use of land; 3.12 Quality in Design; 3.13 Urban Design; of The Southwark Plan (UDP) July 2007.

23 Light Pollution

Prior to the commencement of works above grade on any of the blocks hereby permitted, a detailed lighting strategy and design for all internal and external lighting relating to that block, demonstrating compliance with the Institute of Lighting Professionals (ILP) Guidance Notes, shall be submitted to and approved by the Local Planning Authority in writing. If mitigation is required it shall be implemented prior to the first use of the building and retained as such thereafter.

Reason:

In order that the Council may be satisfied as to the details of the development in the interest of the visual amenity of the area, the amenity and privacy of adjoining occupiers, and their protection from light nuisance, in accordance with The National Planning Policy Framework 2018, Strategic Policy 12 Design and Conservation and Strategic Policy 13 High environmental standards of The Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity and 3.14 Designing out crime of the Southwark Plan 2007.

24 Play

i) Before any above grade work hereby authorised begins, the applicant shall submit details of all the play spaces proposed within the public realm, including 1:50 scale detailed drawings for approval by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with any such approval given and retained as such.

ii) Before any above grade work hereby authorised begins on any of the blocks proposed, the applicant shall submit details of all the play spaces proposed within that block, including 1:50 scale detailed drawings for approval by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with any such approval given and retained as such.

iii) No later than 6 months prior to occupation details of the play equipment to be installed on the site shall be submitted to and approved in writing by the Local Planning Authority. The play equipment shall be provided in

accordance with the details thereby approved prior to the occupation of the residential units. All playspace and communal amenity space within the development shall be available to all residential occupiers of the development in perpetuity.

Reason:

In order that the Council may be satisfied with the details of the play strategy, in accordance with The National Planning Policy Framework 2018 Parts 5, 8, and 12, London Plan (2016) Policy 3.6 Children and young people's play and informal recreation facilities; policies SP11 Open spaces and wildlife and SP12 Design and conservation of The Core Strategy 2011 and the following Saved Policies of The Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design; and 4.2 Quality of residential accommodation

25 Off Street Parking

Before any above grade work hereby authorised begins, 1:50 scale drawings of the off street parking to be provided, including wheel chair accessible parking, the car rental business and car club, shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the car parking facilities shall be retained and the space used for no other purpose and the development shall not be carried out otherwise in accordance with any such approval given.

Reason:

In order to ensure that satisfactory car parking facilities are provided for disabled residents, the re-provided car hire business and the proposed car club, in accordance with The National Planning Policy Framework 2018, Strategic Policy 2 - Sustainable Transport of The Core Strategy and Saved Policies 5.5 Car Parking, 5.7 Parking Standards for disabled people and the mobility impaired and 5.8 Other Parking of the Southwark Plan 2007.

26 Flow Rates

Before any work hereby authorised begins on each block, the specific flow rates for the sanitary ware and water consuming appliances for each of the dwelling types shall be provided to the Local Authority for approval in writing. All dwellings shall be designed to meet 105 litres per person per day (internal water usage), which is equivalent to the 'optional' requirement of the Building Regulations Part G (105 litres/person/day for internal water usage plus 5 litres/person/day for outdoor external usage = 110 litres/person/day). The development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

To ensure the development complies with the National Planning Policy Framework 2018, Strategic Policy 13 (High environmental standards) of the Core Strategy 2011, saved policies 3.3 Sustainability and Energy Efficiency of the Southwark Plan and Policy 5.15 of the London Plan 2015 (Water use and supplies).

27 Cycle Storage

Before any above grade work hereby authorised begins (excluding demolition), the following shall be submitted to and approved in writing by the Local Planning Authority:

- i) 1:50 scale drawings of the facilities to be provided for the secure and covered storage of cycles; and
- ii) Full details of the facilities to be provided in the cycle hub, including 1:50 scale drawings

Thereafter the cycle parking facilities and cycle hub provided shall be retained and the space used for no other purpose and the development shall not be carried out otherwise in accordance with any such approval given.

Reason:

In order to ensure that satisfactory safe and secure cycle parking facilities are provided and retained in order to encourage the use of cycling as an alternative means of transport to the development and to reduce reliance on the use of the private car in accordance with The National Planning Policy Framework 2018, Strategic Policy 2 - Sustainable Transport of The Core Strategy and Saved Policy 5.3 Walking and Cycling of the Southwark Plan 2007.

28 Hard and Soft Landscaping

Before any above grade work hereby authorised begins (excluding demolition), detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings (including cross sections, surfacing materials of any parking, access, or pathways layouts, materials and edge details), shall be submitted to and approved in writing by the Local Planning Authority. The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use.

The hard landscape materials must be natural stone with samples submitted to and approved in writing.

The landscape scheme must be designed to mitigate against the adverse impacts of wind, and the submitted details must demonstrate that the appropriate Lawson Safety Method and Lawson Comfort Method criteria shall be achieved.

The planting, seeding and/or turfing shall be carried out in the first planting season following completion of building works and any trees or shrubs that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the same size and species in the first suitable planting season. Planting shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction and BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf).

Reason:

So that the Council may be satisfied with the details of the landscaping scheme in accordance with The National Planning Policy Framework 2018 Parts 8, 12 & 15, London Plan (2016) Policies 7.6 and 7.7, and policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of The Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity.

29 Radar Mitigation

Prior to the commencement of above grade works, the following shall be submitted to and approved in writing by the Local Planning Authority and by the Radar Operator - NATS (En-route) plc:

- i) detailed plans for the proposed buildings in that individual phase, demonstrating that there would be no detrimental impact upon the operation of the H10 SSR Radar; OR,
- ii) details of a 'Radar Mitigation Scheme' (including a timetable for its implementation during construction) to mitigate any detrimental impact upon the H10 SSR Radar.

"Radar Mitigation Scheme" means a detailed scheme which sets out the measures to be taken to avoid at all times the impact of the development on the H10 Primary and Secondary Surveillance radar and air traffic management operations of the Operator.

Reason:

In the interests of Air Traffic Safety and of the operations of NATS En-route PLC.

30 Landscape Management Plan

Before any above grade work hereby authorised begins, a landscape management plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas (except privately owned domestic gardens), shall be submitted to and approved in writing by the local planning authority. The landscape management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

The scheme shall include soft landscaping, ecological enhancements and roofs.

Reason:

This condition is necessary to ensure the protection of wildlife and supporting habitat and secure opportunities for the enhancement of the nature conservation value of the site. This is a mandatory criteria of BREEAM (LE5) to monitor long term impact on biodiversity a requirement is to produce a Landscape and Habitat Management Plan

31 Green, Brown and Blue Roofs

i) Before any above grade work on each of the Blocks (A, B or C) hereby authorised begins, details of the green, brown and blue roofs proposed for that Block shall be submitted to and approved in writing by the Local Planning Authority. The roofs shall be:

biodiversity based with extensive substrate base (depth 80-150mm);

laid out in accordance with agreed plans; and

planted/seeded with an agreed mix of species within the first planting season following the practical completion of the building works (focused on wildflower planting, and no more than a maximum of 25% sedum coverage).

The green, brown and blue roofs shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency.

The green, brown and blue roofs shall be carried out strictly in accordance with the details approved and shall be

maintained as such thereafter.

Discharge of this condition will be granted on receiving the details of the green, brown and blue roofs and Southwark Council agreeing the submitted plans.

ii) Once the green, brown and blue roofs are completed in full in accordance to the agreed plans a post completion assessment will be required to confirm the roof has been constructed to the agreed specification.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with policy 5.11 of the London Plan 2016, Saved Policy 3.28 of the Southwark Plan and Strategic Policy 11 of the Southwark Core strategy.

Pre-occupation condition(s) - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before the building(s) hereby permitted are occupied or the use hereby permitted is commenced.

32 Electric Vehicle Charging Points

Before the first occupation of the development hereby approved, details of the installation (including location and type) of at least two electric vehicle charger points within the car parking area shall be submitted to and approved in writing by the Local Planning Authority and the electric vehicle charger points shall be installed prior to occupation of the development and the development shall not be carried out otherwise in accordance with any such approval given.

Reason:

To encourage more sustainable travel in accordance with The National Planning Policy Framework 2018, Strategic Policy 2 Sustainable Transport of The Core Strategy 2011 and Saved Policies 3.1 Environmental Effects and 5.2 Transport Impacts of the Southwark Plan 2007.

33 BREEAM

i) Prior to any fit out works to the commercial premises hereby authorised begins, an independently verified BREEAM report (detailing performance in each category, overall score, BREEAM rating and a BREEAM certificate of building performance) to achieve a minimum 'excellent' rating shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any such approval given.

ii) Before the first occupation of each block within the development hereby permitted, a certified Post Construction Review (or other verification process agreed with the local planning authority) shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed standards have been met.

Reason: To ensure the proposal complies with The National Planning Policy Framework 2018, Strategic Policy 13 - High Environmental Standards of The Core Strategy 2011 and Saved Policies 3.3 Sustainability and 3.4 Energy Efficiency of the Southwark Plan 2007.

34 Ventilation / Kitchen Extract

Prior to the commencement of any cafe or restaurant use on the site (use class A3) full particulars and details of a scheme for the ventilation of the premises to an appropriate outlet level, including details of sound attenuation for any necessary plant and the standard of dilution expected, shall be submitted to and approved by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any approval given.

Reason:

In order to ensure that the ventilation ducting and ancillary equipment will not result in an odour, fume or noise nuisance and will not detract from the appearance of the building in the interests of amenity in accordance with The National Planning Policy Framework 2018, Strategic Policy 13 - High Environmental Standards of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of The Southwark Plan 2007

35 Flood Warning and Emergency Evacuation Plan

The basement and ground levels of the site are at residual flood risk from the River Thames, and some surface water flood risk. A stand alone Flood Warning and Emergency Evacuation Plan should be submitted to Southwark's Emergency Planning department for their approval prior in writing to occupation of the site. The plan

should state how occupants will be made aware that they can sign up to the Environment Agency Flood Warning services, and of the plan. It should also provide details of how occupants should respond in the event that they receive a flood warning, or become aware of a flood.

Reason:

To ensure that occupants have the opportunity to respond to Environment Agency flood warnings.

36 Ecology Enhancement Strategy

All of the measures for the mitigation of impact and enhancement of biodiversity set out in the submitted Ecology Enhancement Strategy, shall be implemented in full prior to the new development being first occupied, or in accordance with the timetable detailed in the approved scheme.

Reason:

To increase the biodiversity of the site, to mitigate any impact from the development hereby approved and to comply with Saved Policy 3.28 of the Southwark Plan and Strategic Policy 11 of the Southwark Core Strategy

37 Secure By Design Certification

Before the first occupation of the building hereby permitted evidence that Secure By Design Accreditation has been awarded by the Metropolitan Police and that all approved security measures have been implemented shall be submitted to and approved by the Local Planning Authority.

Reason:

In pursuance of the Local Planning Authority's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention in accordance with The National Planning Policy Framework 2018, Strategic Policy 12 - Design and conservation of The Core Strategy 2011 and Saved Policy 3.14 Designing out crime of the Southwark Plan 2007.

38 Thames Water

No properties shall be occupied until confirmation has been provided that either:

- i) all water network upgrades required to accommodate the additional flows from the development have been completed; or
- ii) 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 <https://developers.thameswater.co.uk/Developingalargesite/Planningyourdevelopment>.

39 Verification of Site Remediation

Prior to occupation of the development, a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, if appropriate, and for the reporting of this to the local planning authority. Any long-term monitoring and maintenance plan shall be implemented as approved.

Reason:

Should remediation be deemed necessary, the applicant should demonstrate that any remedial measures have been undertaken as agreed and the environmental risks have been satisfactorily managed so that the site is deemed suitable for use.

Compliance condition(s) - the following condition(s) impose restrictions and/or other requirements that must be complied with at all times once the permission has been implemented.

40 Land Use

Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order and any associated provisions of the Town and Country Planning General Permitted Development Order (including any future amendment or enactment of those Orders), the Class B1 use hereby permitted shall only be for Class B1(a), (b) or (c) uses.

Reason:

In granting this permission the Local Planning Authority has had regard to the special circumstances of this case in accordance with Strategic Policy 1.2 Strategic and local preferred industrial locations of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan 2007 and the National Planning Policy Framework 2018.

41 Energy Efficiency

The development hereby permitted shall be constructed to include the energy efficiency measures and photovoltaic panels as stated in the Energy Statement submitted in support of the application. All measures and technologies shall remain for as long as the development is occupied.

Reason: To ensure the development complies with the National Planning Policy Framework 2018, Strategic Policy 13 High Environmental Standards of the Core Strategy and Policy 5.7 Renewable Energy of the London Plan 2015.

42 Roof Plant, Equipment or Other Structures,

No roof plant, equipment or other structures, other than as shown on the plans hereby approved or approved pursuant to a condition of this permission, shall be placed on the roof or be permitted to project above the roofline of any part of the buildings as shown on elevational drawings or shall be permitted to extend outside of the roof plant enclosures of any buildings hereby permitted.

Reason:

In order to ensure that no additional plant is placed on the roof of the building in the interest of the appearance and design of the building and the visual amenity of the area in accordance with The National Planning Policy Framework 2018, Strategic Policy 12 - Design and Conservation of The Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity and 3.13 Urban Design of the Southwark Plan 2007.

43 Piling

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason:

The developer should be aware of the potential risks associated with the use of piling where contamination is an issue. Piling or other penetrative methods of foundation design on contaminated sites can potentially result in unacceptable risks to underlying groundwaters. We recommend that where soil contamination is present, a risk assessment is carried out in accordance with our guidance 'Piling into Contaminated Sites'. We will not permit piling activities on parts of a site where an unacceptable risk is posed to Controlled Waters.

44 Surface Water Drainage

Whilst the principles and installation of sustainable drainage schemes are to be encouraged, no drainage systems for the infiltration of surface water drainage into the ground are permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to Controlled Waters. The development shall be carried out in accordance with the approval details.

Reason

Infiltrating water has the potential to cause remobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of groundwater.

45 Unexpected Contamination

If, during development, contamination not previously identified is found to be present at the site then no further

development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority, a remediation strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as approved, verified and reported to the satisfaction of the Local Planning Authority.

Reason

There is always the potential for unexpected contamination to be identified during development groundworks. We should be consulted should any contamination be identified that could present an unacceptable risk to Controlled Waters.

46 Radar Mitigation

Where a 'Radar Mitigation Scheme' has been submitted to discharge condition 30, no construction above 50m AOD shall take place unless the 'Radar Mitigation Scheme' has been implemented. Development shall not take place other than in complete accordance with such a scheme as so approved unless the planning authority and NATS (En-route) plc have given written consent for a variation.

Reason:

In the interests of Air Traffic Safety and of the operations of NATS En-route PLC.

47 Servicing Hours

Any deliveries or collections to the commercial units shall only be between the following hours: 08.00 to 20.00hrs on Monday to Saturday and 10.00 to 16.00hrs on Sundays & Bank Holidays

Reason:

To safeguard the amenity of neighbouring residential properties in accordance with The National Planning Policy Framework 2018, Strategic Policy 13 High environmental standards of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of The Southwark Plan 2007.

48 Noise Transfer Between Commercial/ Community and Residential Uses

The habitable rooms within the development sharing a party ceiling/floor element with commercial or community premises shall be designed and constructed to provide reasonable resistance to the transmission of sound sufficient to ensure that noise due to the commercial or community premises does not exceed NR25 when measured as L10 (5 minute), (or such other standard as may be agreed in writing with the Local Planning Authority as appropriate in the circumstances). A written report shall be submitted to and approved by the LPA. The development shall be carried out in accordance with the approval given. The approved scheme shall be implemented prior to the commencement of the use hereby permitted and shall be permanently maintained thereafter. Following completion of the development and prior to occupation a validation test shall be carried out (on a relevant sample of premises). The results shall be submitted to and approved by the LPA in writing prior to the commencement of the commercial or community use.

Reason:

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities within the commercial/community premises in accordance with strategic policy 13 'High environmental standards' of the Core Strategy (2011), saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007) and the National Planning Policy Framework 2018.

49 Noise

The Rated sound level from any plant, together with any associated ducting shall not exceed the Background sound level (LA90 15min) at the nearest noise sensitive premises. Furthermore, the Specific plant sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific Sound levels shall be calculated fully in accordance with the methodology of BS4142:2014. Prior to the plant being commissioned a validation test shall be carried out following completion of the development. The results shall be submitted to the LPA for approval in writing. The plant and equipment shall be installed and constructed in accordance with the approval given and shall be permanently maintained thereafter.

Reason

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the National Planning Policy Framework 2018, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007).

50 Residential Noise Levels

The dwellings hereby permitted shall be designed to ensure that the following internal noise levels are not exceeded due to environmental noise:

Bedrooms - 35dB LAeq T**, 30 dB LAeq T*, 45dB LAFmax T *

Living rooms- 35dB LAeq T **

Dining room - 40 dB LAeq T **

* - Night-time - 8 hours between 23:00-07:00

** - Daytime - 16 hours between 07:00-23:00

This may be achieved by following the recommendations contained in the Environmental Statement. The scheme shall be implemented prior to the commencement of the use hereby permitted and shall be permanently maintained thereafter. Following completion of the development and prior to occupation, a validation test that demonstrates that the above requirements have been achieved shall be carried out on a representative sample of premises on the worst affected facades and reflecting the differences in design. The results shall be submitted to the LPA for approval in writing.

Reason:

To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with Strategic Policy 13 'High environmental standards' of the Core Strategy (2011) Saved Policies 3.2 'Protection of amenity' and 4.2 'Quality of residential accommodation' of the Southwark Plan (2007), and the National Planning Policy Framework 2018.

Other condition(s) - the following condition(s) are to be complied with and discharged in accordance with the individual requirements specified in the condition(s).

51 Reporting Archaeological Works

Within one year of the completion of archaeological site works, an assessment report detailing the proposals for post-excavation works, publication of the site and preparation of the archive shall be submitted to and approved in writing by the Local Planning Authority and that the works detailed in this assessment report shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order that the archaeological interests of the site are secured with regard to the details of the post-excavation works, publication and archiving to ensure the preservation of archaeological remains by record in accordance with Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and the National Planning Policy Framework 2018.

Statement of positive and proactive action in dealing with the application

The Council has published its development plan and core strategy on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise. A number of amendments have been made to the application in order to enable a positive recommendation to be made.

Informatives

There are water mains crossing or close to the application site. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near their mains (within 3m). They will need to check that the development wouldn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read Thames Water's guide to working near or diverting our pipes:

<https://developers.thameswater.co.uk/Developingalargesite/Planningyourdevelopment/Workingnearordivertingourpipes>

The proposed development is located within 15m of Thames Water's underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are 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/Developingalargesite/Planningyourdevelopment/Workingnearordivertingourpipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what

measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality.

**OPEN
COMMITTEE:**
NOTE:

PLANNING COMMITTEE

Original held in Constitutional Team; all amendments/queries to Virginia Wynn-Jones/Everton Roberts, Constitutional Team, Tel: 020 7525 7055

MUNICIPAL YEAR 2018-19

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