

Planning Committee

Tuesday 27 November 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.

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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: 19 November 2018



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Planning Committee

Tuesday 27 November 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 - 11
	To approve as a correct record the Minutes of the open section of the meetings held on 29 October and 6 November 2018.	
6.	LIBERTY OF THE MINT CONSERVATION AREA	12 - 56

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7.	DEVELOPMENT MANAGEMENT	57 - 61
	7.1. BURGESS BUSINESS PARK, PARKHOUSE STREET, LONDON SE5 7TJ	62 - 177
	7.2. LAND AT 313-349 ILBERTON ROAD, LONDON SE15	178 - 245

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: 19 November 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**.

- (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 29 October 2018 at 7.00 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

OTHER MEMBERS PRESENT: Councillor Evelyn Akoto
 Councillor Richard Livingstone
 Councillor Michael Situ

OFFICER SUPPORT: Simon Bevan, Development management
 Jon Gorst, Legal services
 Philippa Howson, Transport policy
 Amy Lester, Development management
 Alex Oyebade, Transport policy
 Sarah Parsons, Development management
 Michael Tsoukaris, Development management
 Colin Wilson, Development management
 Virginia Wynn-Jones, Constitutional team

1. APOLOGIES

Apologies were received from Councillor Lorraine Lauder.

1. 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 6.1 and 6.2
Members' pack relating to items 6.1 and 6.2.

4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

There were none.

5. MINUTES

RESOLVED:

That the minutes of the meeting held on 9 October 2018 be approved as a correct record and signed by the chair.

6. 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 agenda 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 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.

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

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 community spaces (Classes A1, A2, A3, A4, B1(a),(b),(c) and D1), public sports hall and gym (Class D2), public and private open space, formation of new accesses and alterations to existing accesses, energy centre, associated car and cycle parking and other associated works. (REVISED DESCRIPTION)

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 committee heard the officers' introduction to the report and addendum report. Councillors asked questions of the officers.

A number of objectors addressed the meeting. Members of the committee asked questions of the objectors.

The applicant's agents addressed the committee, and answered questions from the committee.

There were no supporters who lived within 100 metres of the development site present at the meeting that wished to speak.

Councillors Evelyn Akoto, Richard Livingstone and Michael Situ addressed the meeting in their capacity as ward councillors, and answered questions from the committee.

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

A motion to grant the application with additional conditions was moved, seconded, put to the vote and declared carried.

RESOLVED:

1. 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 9 April 2019;
 - Referral to the Mayor of London;
 - Referral to the Secretary of State; and
 - Referral to the Health and Safety Executive (HSE).
2. That the environmental information be taken into account as required by Regulation 30 of the Town and Country Planning (Environmental Impact Assessments) Regulations 2017.
3. 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.
4. That a reasonable proportion of the land designated as B1 A-C be reserved for B1C use.
5. That ward members see the Section 106 agreement prior to its agreement.

6.2 47-49 TANNER STREET, LONDON, SE1 3PL

PROPOSAL:

Redevelopment of the site involving the provision of a 7-storey building, with basement, incorporating the retention of the existing 3-storey warehouse, for B1(a) Office Use. Together with associated landscaping, cycle parking and the demolition of an existing detached ancillary store building.

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

A number of objectors addressed the meeting. Members of the committee asked questions of the objectors.

The applicant's agents addressed the committee, and answered questions from the committee.

There were no supporters who lived within 100 metres of the development site present at the meeting that wished to speak.

There were no ward councillors present at the meeting that wished to speak.

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

A motion to grant the application with additional conditions was moved, seconded, put to the vote and declared carried.

RESOLVED:

1. That planning permission is granted subject to conditions and the completion of a legal agreement.
2. In the event that the legal agreement is not completed by 31 January 2019, that the Director of Planning be authorised to refuse planning permission for the reasons set out in paragraph 81 of this report.
3. That a condition be added to confirm that a proposal for a repair/restoration of the interior and exterior of the existing warehouse be created.

Meeting ended at 11.05 pm

CHAIR:

DATED:

Planning Committee

MINUTES of the OPEN section of the Planning Committee held on Tuesday 6 November 2018 at 6.30 pm at Ground Floor Meeting Room G02C - 160 Tooley Street, London SE1 2QH

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

OTHER MEMBERS PRESENT: Councillor Jack Buck
Councillor Paul Fleming

OFFICER SUPPORT: Simon Bevan, Development management
Tom Buttrick, Development management
Jon Gorst, Legal services
Philippa Howson, Transport policy
Yvonne Lewis, Development management
Terence McLellan, Development management
Alex Oyebade, Transport policy
Michael Tsoukaris, Development management
Colin Wilson, Development management
Virginia Wynn-Jones, Constitutional team

1. APOLOGIES

There were none.

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 item 7.3

4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

There were none.

5. CONFIRMATION OF ARTICLE 4 DIRECTION TO WITHDRAW THE PERMITTED DEVELOPMENT RIGHTS GRANTED BY SCHEDULE 2, PART 3, CLASS O OF THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) ORDER 2015 (AS AMENDED)

Officers presented the report. Members had no questions for the officer.

RESOLVED:

1. That the confirmation of a non-immediate Article 4 Direction (Appendix A) to withdraw the permitted development rights granted by Schedule 2, Part 3, Class O of the Town and Country Planning (General Permitted Development) (GPDO) Order 2015 for changes of use from office use (Class B1a) to a dwellinghouse (Class C3) in the Central Activities Zone in Southwark (Appendix B) be authorised. The Direction allows more than 12 months notice prior to the date when Class O will come into effect for the Central Activities Zone (31 May 2019).
2. That the equalities analysis of the proposed Article 4 Directions (Appendix C) be noted.
3. That the arrangements for confirming the Article 4 Direction including compliance with the notification requirements under the Town and Country Planning (General Permitted Development) Order 2015 be delegated to the Director of Planning.

6. ARTICLE 4 DIRECTION TO WITHDRAW THE PERMITTED DEVELOPMENT RIGHTS PERMITTING THE DEMOLITION OF THE OLD SOUTHERN RAILWAY STABLES AND THE FORGE, CAITLIN STREET WITHIN OLD KENT ROAD OPPORTUNITY AREA

Officers presented the report. Members had no questions of the officer.

RESOLVED:

1. That the confirmation of an immediate Article 4 Direction (Appendix A) to withdraw the permitted development right granted by Class B, Part 11, Schedule 2 of the Town and Country Planning General Permitted Development Order 2015 (as amended) (GPDO) which would otherwise permit the demolition of the Old Southern Railway Stables and Forge buildings, Caitlin Street ('the Stables and the Forge')

(site location identified at Appendix B of the report) in the Old Kent Road Opportunity Area that has been identified as a heritage asset be authorised.

2. That the updated equalities analysis of the proposed Article 4 Direction (Appendix C of the report) be noted.
3. That the arrangements for confirming the Article 4 Direction including compliance with the notification requirements under the Town and Country Planning (General Permitted Development) Order 2015 be delegated to the Director of Planning.

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 agenda 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 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.

7.1 AYLESBURY ESTATE, LAND BOUNDED BY ALBANY ROAD, PORTLAND STREET, WESTMORELAND ROAD AND BRADENHAM CLOSE, LONDON SE17 (KNOWN AS THE FIRST SITE DEVELOPMENT)

PROPOSAL:

Minor material amendments to planning permission 14/AP/3843 to include: Provision of an additional 12 units (including three townhouses in place of the Gas Pressure Reduction Station); revisions to unit and tenure mix; internal reconfiguration and elevational alterations; minor alterations to landscape layouts, amenity space and roof space.

Items 7.1 and 7.2 were heard together.

The committee heard the officers' introduction to the report. Councillors asked questions of the officers.

There were no objectors present at the meeting who wished to speak.

The applicant's agents addressed the committee, and answered questions by the committee.

There were no supporters who lived within 100 metres of the development site present at the meeting who wished to speak.

Councillors Paul Fleming and Jack Buck addressed the meeting in their capacity as ward councillors, and answered questions by the committee.

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

A motion to grant the application was moved, seconded, put to the vote and declared carried.

RESOLVED:

With regard to application reference 17/AP/3885 - That planning permission is GRANTED subject to conditions and the applicant entering into an appropriate Deed of Variation to the S106 Legal Agreement signed on 5 August 2015 as part of the parent application (reference 14/AP/3843), and subject to referral to the Mayor of London.

That the S106 agreement include an amendment to confirm that monies secured for childs play can be spent within Faraday Ward rather than solely within Burgess Park.

7.2 AYLESBURY PLOT 18 WITHIN LAND BOUNDED BY THURLOW STREET TO THE EAST, DAWES STREET TO WEST, INVILLE ROAD TO THE SOUTH AND PLOT 9 (A/B) OF THE AYLESBURY REGENERATION TO THE NORTH , LONDON SE17

Proposal:

Minor material amendment to planning permission 16/AP/2800 to include: Changes to the tenure mix; re-positioning of Block 3; and minor elevational alterations.

Items 7.1 and 7.2 were heard together.

RESOLVED:

With regard to application reference 17/AP/3846 - That planning permission is GRANTED subject to conditions.

7.3 60A AND 62 HATCHAM ROAD AND 134-140 ILBERTON ROAD, LONDON SE15 1TW

PROPOSAL:

Application for full planning permission for mixed use redevelopment comprising: demolition of existing buildings and construction of a building ranging in height from four to nine storeys to provide 1,179 sqm (GIA) of commercial space (use class B1) at ground floor, 86 residential dwellings above (30 x 1 bed, 39 x 2 bed and 17 x 3 bed), with associated amenity areas, cycle and disabled car parking and refuse/recycling stores.

(This application represents a departure from strategic policy 10 'Jobs and businesses' of the Core Strategy (2011) and saved policy 1.2 'strategic and local preferred industrial locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location - strategic).

The committee heard the officers' introduction to the report. Councillors asked questions of the officers.

There were no objectors present at the meeting who wished to speak.

The applicant's agents addressed the committee, and answered questions by the committee.

There were no supporters who lived within 100 metres of the development site present at the meeting who wished to speak.

There were no ward councillors present at the meeting who wished to speak.

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

A motion to grant the application was moved, seconded, put to the vote and declared carried.

RESOLVED:

1. That planning permission be granted, subject to conditions and following the completion of a s106 agreement.
2. That those conditions include one three bedroom apartment on the fourth floor be moved from the category of shared ownership to social rent.
3. In the event that the s106 agreement is not completed by 2 April 2019 that the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 167 of the report.

Meeting ended at 9.00 pm

CHAIR:

DATED:

Item No. 6.	Classification: Open	Date: 27 November 2018	Meeting Name: Planning Committee
Report title:		Liberty of the Mint Conservation Area	
Ward(s) or groups affected:		Borough and Bankside	
From:		Director of Planning	

RECOMMENDATIONS

1. That the Planning Committee consider the responses from the Borough, Bankside and Walworth Community Council and the results of the public consultation following the designation the Liberty of the Mint Conservation Area.
2. That the Planning Committee adopts the conservation area appraisal, attached at appendix 1.

BACKGROUND INFORMATION

3. On 1 December 2015 the Planning Committee considered a report to designate the Liberty of the Mint Conservation and to carry out public consultation on an appraisal and management plan. Following the Planning Committee meeting letters were sent to all the owner/ occupiers of properties in the immediate area and a wider boundary around the proposed conservation area giving a twelve week consultation period. The letters included general guidance on the implications of a conservation area designation and advice on how to access the draft Liberty of the Mint Conservation Area Appraisal which was published on the council's website.
4. Officers attended the Borough, Bankside and Walworth Community Council meeting on the 30 January 2016, in order that Members could provide comment on the conservation area boundaries and appraisal. A public meeting was also held on the 4 February 2016 at St. George the Martyr, Borough High Street. The meeting was well attended and the majority positively supported the designation of the conservation area. There were a number of feedback forms completed on the day and in all over 20 responses were received during the consultation period.
5. The Liberty of the Mint Conservation Area is a cohesive townscape comprising of properties from the late 19th and early 20th centuries. The conservation area is generally found in the area bounded by Borough High Street Marshalsea Road and Great Suffolk Street and contains a varied section of Southwark townscape broadly dating from the later 19h century. This consists of a mix of industrial, residential, educational, transport and historic, mixed-use buildings fronting onto Borough High Street. The area has a particular significance due to the rebuilding of much of the area with the construction of Marshalsea Road dating from 1888. The southern parts of the conservation area retain much of the Victorian character of closely packed former industrial and residential buildings defining a tight, well-defined townscape. The historic street layout remains,

creating a legible and permeable environment. The intimate scale and high quality and architecturally interesting frontage developments have survived largely intact.

6. The area covered by the designation is defined as follows: the north boundary of the Conservation area follows the centre line of Marshalsea Road, but includes 6-14 (even) and 20-22 (even) Marshalsea Road which are located to the north side of the road. The west boundary follows the east boundary of Mint Street Park, continuing south along Sudrey Street, including the east side of this street. The south boundary runs behind properties on Great Suffolk Street, and heads south to include the public house at 125 Great Suffolk Street. Industrial buildings at the junction of Toulmin Street and Great Suffolk Street are included in the conservation area up to number 131 Great Suffolk Street. The west boundary of the grounds of Charles Dickens School and number 48 Lant Street mark the west extent, before the conservation area boundary continues along Lant Street, crossing south to include the Gladstone Public House. The east boundary of the conservation area then heads north on the west side of Borough High Street including numbers 196-230 (even) Borough High Street meeting the Borough High Street Conservation Area adjacent to St George the Martyr Church.

KEY ISSUES FOR CONSIDERATION

7. Over 20 consultation responses were received, the overwhelming number of these wrote in support and respondents highlighted the quality and character of the area. A summary of the specific issues raised in the responses received from the public consultation are set out below. The GLA's Heritage Advisor wrote in support. Historic England also supported the designation and provided comment on the content of the appraisal; these recommendations have been taken on board and incorporated into the amended conservation area appraisal. Four comparable objection letters were received from a consultant representing four sites within the conservation area and this is dealt with in more detail below.
8. The responses received as a result of the public consultation raised the following points (officer comment is provided in italics):

- Three comments were received on line and strongly supported the designation and hoped it would ensure that buildings of historic value are preserved where possible.

Officer response: The designation of the Liberty of the Mint Conservation Area, has given the Council additional powers over the development and the use of land within it. The Council are now able to exercise a greater degree of control over the demolition or substantial demolition of buildings in the conservation requiring applicants to gain planning permission for any replacement before they can go ahead and demolish the building.

- One objector to the conservation area considered the boundary to be random and queried the inclusion of modern buildings.
- Four separate identical objections were received from the owners of No. 5 Vineyard, Nos. 52-56 Lant Street, Nos. 218-220 and 222-224 Borough High Street via their planning consultant, who commented that the conservation area was an excessive response to an invalid application. Also considered that the appraisal was missing key elements such as

maps. They also objected to paragraph 4.5.2 in relation to scale of the replacement buildings. They considered this did not reflect the NPPF. In addition the letter in response to 222-224 Borough High Street also considered that the boundary should not extend along the Borough High Street frontage.

- At the public meeting, one response was received regarding extending out to take in Mint Street park and north of Marshalsea Road.

Officer response: Large expanse of open space are not routinely included in Conservation Areas unless they are part of the historic structure of the area: Mint Street park was created in the 1980s so is not part of the historic development of the area. Historic buildings north of Marshalsea Road are included.

Planning Policy

9. Core Strategy 2011 (April)
Strategic Policy 12 Design and Conservation.

Southwark Plan 2007 (July)

Saved Policy 3.15 Conservation of the Historic Environment

Saved Policy 3.16 Conservation Areas

Saved Policy 3.18 Setting of Listed Buildings, Conservation Areas and World Heritage Sites

Saved Policy 3.19 Archaeology

London Plan 2011 (July)

Policy 7.9 Heritage-led regeneration

Policy 7.8 Heritage assets and archaeology

National Planning Policy Framework (NPPF)

Para 185

Para. 190

Principles of designation and current guidance

10. The conservation area contains predominantly late 19th century early 20th century industrial and warehouse buildings. The layout of the roads in the conservation area generally dates from the 1800s although the buildings fronting the roads are generally later. The conservation area demonstrates the pressure on land during the latter half of the 19th century to accommodate the increase in industrial activities. The streets are generally well enclosed by industrial and warehouse buildings of a high quality and architecturally interesting frontage.
11. The key approaches into the conservation area are: from the north along Marshalsea Road; from the east along Borough High Street and from the south along great Suffolk Street. Mint Street Park on its western edge, offers views of the across the historic area. Vistas along the narrow streets within the conservation area are generally closed off by built form and the former Board School (Charles Dickens School) at the centre of the conservation area. Generally views are axial along linear streets however, the bend of Marshalsea Road establishes a dynamic characterful view.

12. Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a duty on the local Planning Authority to determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance and further allows for those areas to be designated as conservation areas. There is a duty on the local planning authority under Section 69 to review areas from time to time to consider whether designation of conservation areas is called for.
13. In July 2018, the revised National Planning Policy Framework was published by Department of Housing, Communities and Local Government. With relation to the assessment of significance of heritage assets, including conservation areas, the guidance states “Plans should set out a positive strategy for the conservation and enjoyment of the historic environment” (para. 185) and when assessing proposals, “Local planning authorities should identify and assess the particular significance of any heritage asset”. (para. 190) Conservation Area Appraisals and Management Plans enable the Council to affectively undertake these tasks as required by the NPPF.
14. In 2011 English Heritage (now Historic England) published guidance on conservation area appraisals, ‘Understanding Place: Conservation Area Designation, Appraisal and Management’. This sets out the importance of definition and assessment of a conservation area’s character and the need to record the area in some detail. The purpose is to provide a sound basis for rational and consistent judgements when considering planning applications within conservation areas. Conservation area appraisals, once they have been adopted by the Council, can help to defend decisions on individual planning applications at appeal. They may also guide the formulation of proposals for the preservation and enhancement of the area.
15. Designation of a conservation area imposes certain duties on planning authorities. These duties are twofold, firstly, to formulate and publish from time to time, proposals for the preservation and enhancement of the conservation areas in their district and submit them for public consultation. Then secondly, in exercising their planning powers to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation areas. In exercising conservation area controls, local planning authorities are required to pay special attention to the desirability of preserving or enhancing the character or appearance of the area in question and therefore there is a presumption against the demolition of buildings within the area. In the case of conservation area controls, however, account should clearly be taken of the part played in the architectural or historic interest of the area by the building for which demolition is proposed, and in particular of the wider effects of demolition on the building's surroundings and on the conservation area as a whole.

Outstanding Schemes

16. The main focus of development in the area has been focussed on the Borough High Street and Marshalsea Road frontages as well as Vineyard to the rear. Notwithstanding this, the cohesive nature of the townscape has meant that new development opportunities have been limited in scope. In the last eight years the only significant new development in the area of the proposed conservation area has been: 218-220 Borough High Street – Ref: 10-AP-2304 – for *Redevelopment of site for a mixed use development comprising six storeys (basement and five floors above ground) including retail/professional services/cafe - restaurant (Use*

Classes A1/A2/A3) at ground floor and basement and seven residential units

And

16-AP-4467 at 133-135 Great Suffolk Street, SE1 1PP for Demolition of existing four-storey commercial building and redevelopment to provide a five-storey (plus basement) commercial building (Use Class B1). This application is outside the Conservation Area however affects its setting. It was granted consent.

17. In 2015, a planning application was received in relation to the Gladstone Public House at 64 Lant Street (ref 15-AP-3137) for: *Demolition of existing public house; and erection of ten storey building comprising Class A3/A4 use at ground floor level and 9 residential units (Class C3) across upper floors*. This application is invalid and not started.
18. The council has also received an application from the public for the designation of the Gladstone Public House at 64 Lant Street as an Asset of Community Value (ACV). This was listed as an ACV by the council on 9 September 2015 and it remains on the list for 5 years. The owners requested a review of the decision which has been heard but was not upheld so the listing remains in place. The panel considered it was a valid nomination, there was good evidence that it furthers the social wellbeing of the community and that it is reasonable to think that it could do so. (The list of designated ACVs is published is at this weblink:
http://www.southwark.gov.uk/downloads/download/3226/assets_of_community_value-successful_bids)

Community impact statement

19. The designation has been consulted in accordance with the Statement of Community Involvement. The Statement of Community Involvement sets out how and when the Council will involve the community in the alteration and development of town planning documents and applications for planning permission and was adopted in January 2008. The Statement of Community Involvement does not require the Council to consult when designating a conservation area, but in this instance the Council proposes to follow a similar procedure.
20. A public meeting was held within 12 weeks of the Planning Committee and to report any consultation responses received back to Members for consideration.
21. The consultation sought the views of local residents, businesses and other local interests over the definition of the boundaries and the conservation area appraisal. Notification of the consultation on the proposed designation and the supporting documents will be put in the local press, on the council's website and will be made available at the Walworth One Stop Shop. This will show how the consultation has complied with the Statement of Community Involvement.

Human rights implications

22. This conservation area may engage 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.

23. This proposal has the legitimate aim of providing for the conservation of the historic environment within the conservation area. The rights potentially engaged by this proposal, include the right to a fair trial and the right to respect for private and family life however both of these are not considered to be unlawfully interfered with by this proposal.

Resource implications

24. Notifying the public of the Liberty of the Mint Conservation Area did not result in resource implications for the staffing of the Department of the Chief Executive.
25. Other resource implications will be the cost of publishing the conservation area appraisal, which can met within the Department of the Chief Executive's revenue budget. The cover price of the document will be fixed to cover production costs.
26. The conservation area could generate additional casework for planning staff. However, given the location and scale of many of the proposals in this area there is already an attention to the design and appearance of the proposals and the designation should not result in significant resource implications for the staffing of the Department of the Deputy Chief Executive.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Strategic Director of Finance and Corporate Services

Director of Law and Democracy

27. Planning Committee authorised in December 2015 the designation of the Liberty of Mint as a conservation area and is now asked to consider the results of a public consultation as recommended by Historic England concerning the appraisal and management plan and also the comments from the Community Council.
28. A conservation area is an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance (*section 69(1), Planning (Listed Buildings and Conservation Areas) Act (LBA) 1990*). A Local Planning Authority (LPA) is under a duty to designate conservation areas within its locality and to review them from time to time (*section 69(2)*).
29. There is no statutory requirement for LPAs to consult with anyone before a conservation area is designated, nor does the Councils Statement of Community Involvement require consultation in respect of designating Conservation Areas. However, Historic England advises LPAs to consult as widely as possible, not only with local residents and amenity societies, but also with Chambers of Commerce, Public utilities and Highway authorities.
30. There is no formal designation procedure. The statutory procedure simply involves a council resolution to designate being made. The date of the resolution is the date the conservation area takes effect. The designation of conservation areas is reserved to Planning Committee under Part 3F, paragraph 3 of the Constitution, and consultation of Community Council members will take place before the designation is confirmed.

31. There is no statutory requirement on the level of detail that must be considered by an LPA before designation. However, guidance from Historic England states that it is vital an area's special architectural or historic interest is defined and recorded in some detail. A published character appraisal is highly recommended and can be found at Appendix 1 of this report. The overall impetus for designating a conservation area must be the desire to preserve and enhance the area.
32. Notice of the designation must be published in at least one local newspaper circulating in the LPA's area and in the London Gazette (*section 70(8), LBA 1990*). The Secretary of State and English Heritage must also be notified (*section 70(5)*). There is no requirement to notify the owners and occupiers of premises in the area. The conservation area must be registered as a local land charge (*section 69(4)*).
33. The designation of a conservation area gives the LPA additional powers over the development and the use of land within it and has the following consequences;
- control of demolition of buildings - all demolition will require conservation area consent
 - any new development will need to enhance or preserve the conservation area –
 - protection of trees – certain criminal offences arise if trees in the conservation area are cut down or wilfully damaged without the consent of the LPA
 - duty of LPA to formulate and publish from time to time proposals for the conservation and enhancement of conservation areas (e.g, by updating conservation area appraisals)
 - certain permitted development rights are more restricted
 - specific statutory duties on telecommunications operators
 - exclusion of certain illuminated advertisements [although not very relevant in this context]
 - publicity for planning applications affecting the conservation area must be given under Section 73(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990
34. There is no statutory right of appeal against a building being included in a conservation area. However, it is possible to seek a judicial review of an LPA's decision to designate a conservation area.

Equalities and Human Rights

35. Positive equalities obligations are placed on local authorities, sometimes described as equalities duties with regard to race, disability and gender.
36. Gender equality duties were introduced by the Equality Act 2006, which
37. Equalities and Human Rights have been considered as part of the development conservation area appraisal and an Equalities Impact Assessment (EqIA) is in the process of being completed. Equalities issues are considered in detail in the analysis set out at Appendix 2 to this report. Paragraph 7 to section 2 of the report provides the officer view that the appraisal and management plan contributes to eliminating discrimination, promoting equality of opportunity and promoting social cohesion

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
None		

APPENDICES

No.	Title
Appendix 1	Draft conservation area assessment for Liberty of the Mint Conservation Area.
Appendix 2	Map of the Liberty of the Mint Conservation Area
Appendix 3	Equality Impact Assessment

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Development Management	
Report Author	Catherine Jeater, Senior Planner, Design and Conservation Team	
Version	Final	
Dated	17 November 2015	
Key Decision?	Yes	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance and Corporate Services	Yes	Yes
Finance Director	No	No
Cabinet Member	No	No
Date final report sent to Constitutional Team	16 November 2018	



The Liberty of The Mint

Conservation Area Appraisal (Adopted November 2018)

www.southwark.gov.uk

Liberty of the Mint Conservation Area Appraisal and Management Guidelines

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Section 1: Introduction

1.1 Conservation Area Appraisal: Purpose

The purpose of this statement is to provide an account of the Liberty of the Mint Conservation Area, its character and significance, and a clear indication of the Borough Council's approach to its preservation and enhancement. It is intended to assist and guide all those involved in development and change in the area, and will be used by the Council in assessing the design of development proposals.

1.2 The statutory definition of a conservation area is an "area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance." Conservation areas are normally centred on historic buildings, open space, or an historic street pattern. A town space or features of archaeological interest may also contribute to the special character of an area. It is, however, the character of an area, rather than individual buildings, that such a designation seeks to preserve or enhance. The most recent legislation dealing with conservation areas is the Planning (Listed Buildings and Conservation Areas) Act, 1990 (Sections 69 to 78). Guidance to the legislation is given in the National Planning Policy Framework (NPPF), published by the Department of Communities and Local Government in July 2018.

1.3 Planning legislation requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of the conservation area. In doing this the emphasis will be on control rather than prevention, to allow the area to remain alive and prosperous but at the same time to ensure that any new development accords with its special architectural and visual qualities.

1.4 This statement has been prepared following guidance given by Historic England in their report *Understanding Place: Designation and Management of Conservation Areas* (2011). This appraisal will be a material consideration in assessing applications affecting the conservation area or its setting.

1.5 Arrangement of this document

Following the Introduction, Section 2 provides a brief history of the area and its historic development. Section 3 starts with a broad appraisal of its character and appearance, with reference to the range of materials, details and building types to be found in the area. Section 3 describes the area with specific reference to architectural and historic qualities, views and townscape, the character and relationship of public and green spaces, and any elements that detract from the conservation area. **Significance** is also defined in this section. Section 4 provides an audit of the features of special interest of the area, including listed buildings, particular groups of unlisted buildings, and trees, planting and other streetscape elements. Section 5 provides guidelines for future management and change in the conservation area.

1.6 Location

1.7 The Liberty of the Mint Conservation Area is situated, broadly, to the west and south of Borough Tube Station in the north the borough The Liberty of the Mint Conservation Area adjoins the Borough High Street Conservation area adjacent to St George the Martyr Church. The north boundary of the Conservation area follows the centre line of Marshalsea Road, but includes 6-14 (even) and 20-22 (even) Marshalsea Road which are located to the north side of the road. The west boundary follows the east boundary of Mint Street Park, continuing south along Sudrey Street, including the east side of this street. The south boundary runs behind properties on Great Suffolk Street, and heads south to include the public house at 125 Great Suffolk Street. Industrial buildings at the junction of Toulmin Street and Great Suffolk Street are included in the conservation area up to number 131 Great Suffolk Street. The west boundary of the grounds of Charles Dickens School and number 48 Lant Street mark the west extent, before the conservation area boundary continues along Lant Street, crossing south to include the Gladstone Public House. The east boundary of the conservation area then heads north on the west side of Borough High Street including numbers 196-230 (even) Borough High Street meeting the Borough High Street Conservation Area adjacent to St George the Martyr Church. A boundary map is provided at figure 1.

1.8 The conservation area also contains much of the site of the former Brandon House/Suffolk Place, the former palace of the Dukes of Suffolk. Much of the area of this property has been excavated on the site of the modern building known as Brandon House, which stands at the north-west junction of Borough High Street and Marshalsea Road.

1.9 Topography

Visually the conservation area is level and generally at a maximum elevation of 4.30m above OS Datum.

1.10 Planning History

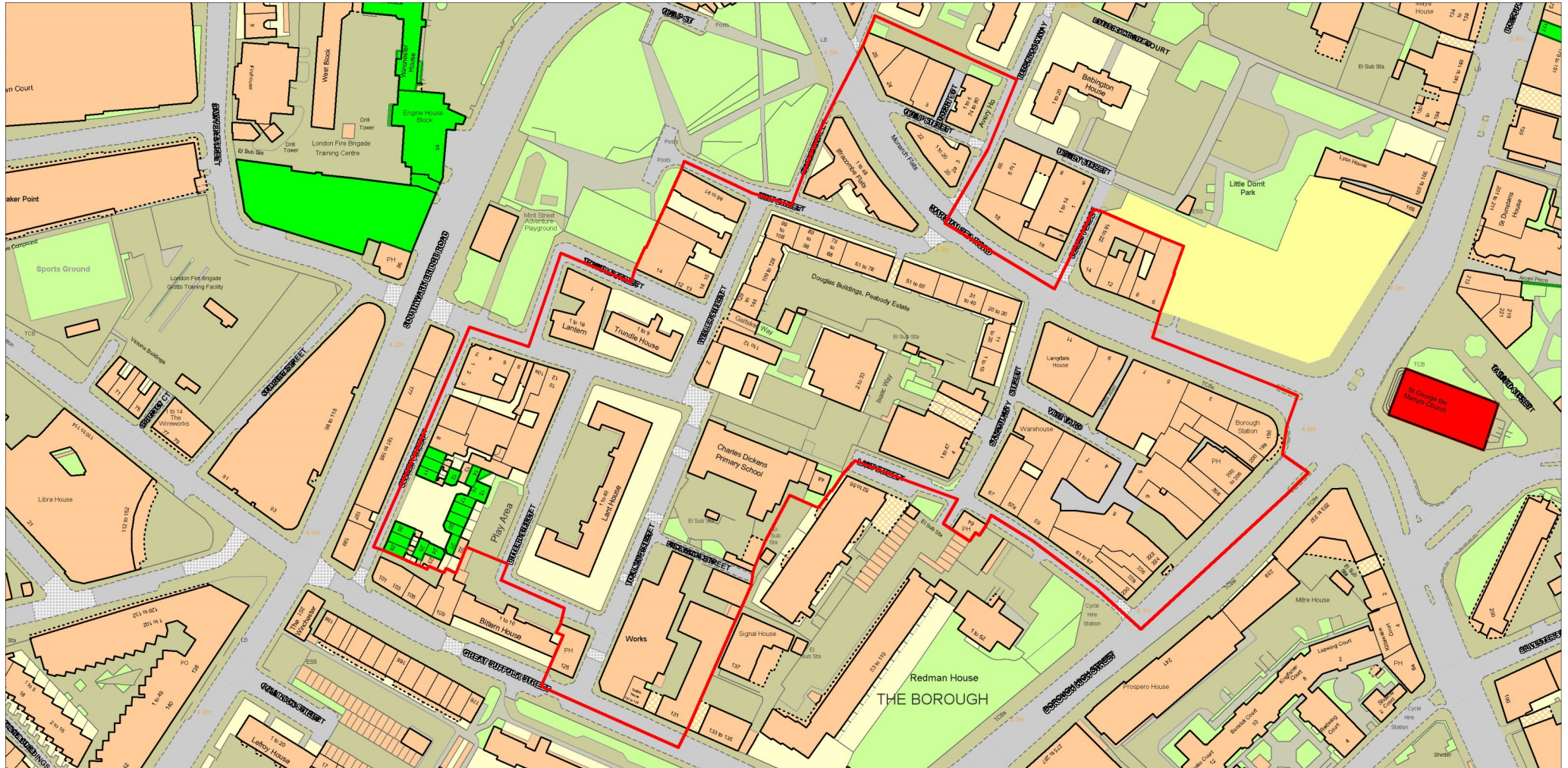
In recognition of this special character, the Liberty of the Mint Conservation Area was originally designated by the Council on 1st December 2015, under the Civic Amenities Act of 1967.

1.11 Further Information

This document is not exhaustive, and further advice and information can be obtained from the Planning Department, London Borough of Southwark.

1.12 Information on planning policy, including the Southwark Plan, including electronic versions of the plan and supplementary planning guidance, can be found on the Council's web site at www.southwark.gov.uk. National guidance and policy on the conservation of heritage assets, including conservation areas can be found at www.gov.uk

Figure 1: Liberty of the Mint Conservation Area



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Section 2: Historic Background

2.1 Roman, Medieval, post medieval historic development

The conservation area lies within the 'Northern Southwark and Roman Roads', Tier 1 Archaeological Priority Area (APA). The APA is the most archaeologically significant area of Southwark containing complex deeply stratified multi-phase archaeology dating from prehistoric times to the modern day. Roman Southwark was focused on two large gravel islands (North and South), separated by braided river channels. The north side of Marshalsea Road stands roughly on the alignment of the Borough Channel. This is one of the 'rivers' that characterised the landscape of prehistoric and Roman Southwark. The channel divided the south island of the Roman settlement from the 'mainland'. The conservation area also includes part of the extensive Roman 'Southern Cemetery' where very significant Roman funerary deposits have been encountered, particularly the rich grave goods excavated on the site of 52-56 Lant Street. Beyond Lant Street, in the wider area, the line of Stane Street, the Roman road south to Chichester, probably broadly follows the line of Borough High Street (A3) and Newington Causeway south, and large and prestigious Roman buildings and settlement evidence has been found flanking the road.

2.2 The site of the former Brandon House, at the modern day junction of Borough High Street and Marshalsea Road occupied the south-west extent of the built-up area of the Borough of Southwark. There appears to be little historical evidence for the development of the site, but Wyngarde's Panorama of London, drawn 1543-44, shows the house in some detail. Based upon the evidence of the Panorama, between 1518 and 1522 Charles Brandon, the Duke of Suffolk, extended an existing late medieval courtyard house with a block of four stories, crowned with six onion-domed towers. Suffolk Place was one of the great houses or palaces that existed in Southwark during the Tudor period and was described by John Stow, writing in c 1600, as the '*large and sumptuous house builded by Charles Brandon, late Duke of Suffolk*'. During the first half of the 16th century it was fashionable among the wealthy in the south-east of England to adorn their new residences with ornate architectural terracottas used to produce features like decorative panels, entablature, pilasters and windows. The archaeological work undertaken on the site of the modern Brandon House, and earlier finds demonstrate that the remains of the Tudor building continue to the north, east, south and west of the site. Those remains to the south and west of the site are in the Conservation Area.

2.3 The north side of Marshalsea Road stands roughly on the alignment of the Borough Channel. This is one of the 'rivers' that characterised the landscape of prehistoric and Roman Southwark. The channel divided the south island of the Roman settlement from the 'mainland'. Within the area around Lant Street is a significant area of Roman burials excavated on the site of 52-56 Lant Street. Whilst this is one area where roman burials have been excavated it may be part of a more extensive cemetery.

2.4 Beyond Lant Street, in the wider area, the line of Stane Street, the Roman road south to Chichester probably broadly follows the line of Borough High Street and Newington Causeway south.

2.5 Post medieval to present day

The name 'Liberty of the Mint' comes from the establishment by Henry VIII of a royal mint at Brandon House in 1545. As part of a programme to debase the coinage, and increase production, the Southwark mint was founded along with three others at Canterbury, York and in

the Tower of London. The Southwark mint was in use until 1551.

2.6 In 1550 Edward VI issued a charter passing the crown's extensive landholdings in Southwark to the City of London. The site of Brandon House, and the lands immediately associated with it remained in Royal possession and were excluded from the charter. Mary I passed the house and its immediate lands to the Archbishop of York. The archbishop proceeded to demolish the house and the site was redeveloped as part of the town.

2.7 Based upon the exclusion of the site of Brandon House from the 1550 charter, the idea developed, during the 17th century, that people residing within the Mint claimed privilege of exemption for all legal civil and criminal processes. There descriptions of the area which state it was entered via Mint Street, the predecessor of Marshalsea Road, through a timber gateway. Other entrances to the area were gated. The Mint then became an asylum for debtors, convicts and felons.

2.8 The Liberty survived an act of 1695-6 intended to abolish it, despite the act imposing fines of £500 and transportation, and it was not until 1723, with the passing of 'An Act for the more effectual Execution of Justice in a pretended privileged Place in the Parish of Saint George in the County of Surrey, commonly called the Mint; and for bringing to speedy and exemplary Justice, such Offenders as are therein mentioned; and for giving Relief to such persons are proper Objects of Charity and Compassion there.' that the area was cleared of its residents. Despite the passing of the 1722 act it appears there was no effort to clear the housing within the area. In 1819, with the construction of Southwark Bridge Road, this bypassed the Mint to the west. The construction of Marshalsea Road, completed in 1888, to reduce traffic on London Bridge, lead to the clearance of the Mint area. However some slum dwellings survived in the area of Redcross Way up to 1898.

2.10 The Mint is referred to in literature including Willem Defoe's Moll Flanders. The clearance of the area, and the 1722 Act, is also mentioned in John Gay's Beggars' Opera. The infamous Jack Sheppard and Jonathan Wild, early 18th century criminals, used the Mint as a base keeping horses on Redcross Street. Charles Dickens lived in Lant Street as a child during the 1820s.

2.11 Extensive slum clearance in the mid 19th century, and the construction Marshalsea Road, linking Borough High Street with Southwark Bridge Road brought a new street plan to the area, however many warehouse and courtyards remained accessed via carriageways from the main roads, particularly Borough High Street and Great Suffolk Street, Large philanthropic social housing blocks, including Douglas and Ilfracombe Buildings, Monarch Flats and Lant Street School (now Charles Dickens Primary School) provided better quality living conditions and facilities for the developing area. The development of the Lant Street estate in the 1950s continued the post-war regeneration of old housing stock, characteristic of many other areas in the borough.

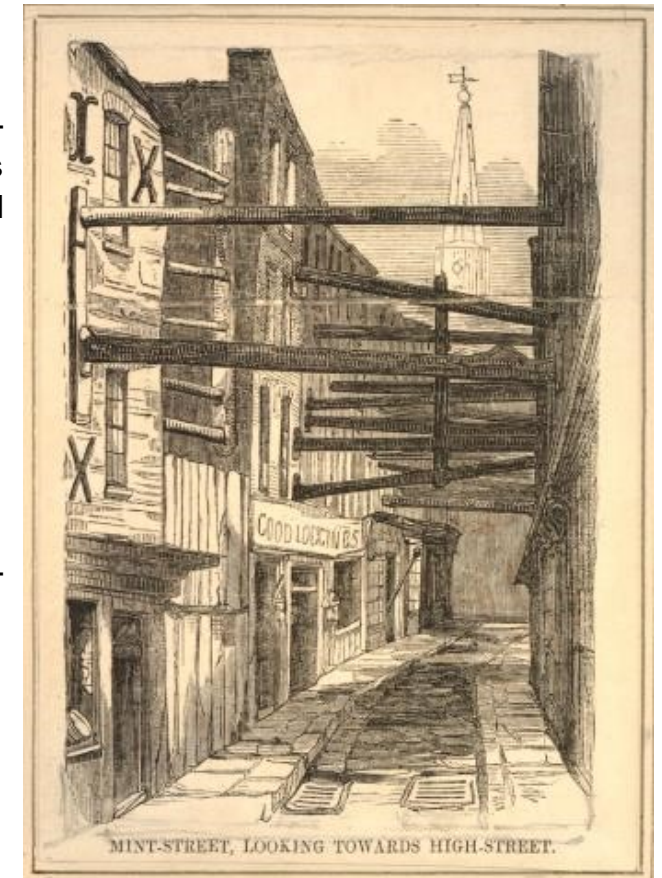


Figure 2: Mint Street c. 1853 from London Picture Archive

Section 3: Appraisal and assessment

3.1 The built heritage of the conservation area, as we see it today, dates largely from the 1888 clearance and the construction of Marshalsea Road. Set-piece architecture such as the triangular Ilfracombe and Monarch flats, which flank Marshalsea Road, date from 1888 and were built by James Hartnoll as a commercial enterprise. Other elements of what is now the Peabody estate, such as Douglas House, were built in 1886, by the Improved Industrial Dwellings Company, where, unlike many blocks of this period, the block was built with self-contained flats.

3.2 Also of note are Gable Cottages, located at the south end of Sudrey Street. This is a group of almshouses, listed at Grade II. The cottages are arranged around three sides of a grassed courtyard in an irregular manner showing many gables or pitches roofs to the street frontage. They are of two stories with brick ground floors and half-timbered, roughcast or tile-hung first floors.

3.3 The Lantern, number 1 Trundle Street, is a modern housing block with concrete piers to the ground floor clad with timber, glazing and panels overlooking Mint Street. Park. Lant House, between Bittern Street and Toulmin Street, is a five storey, inter-war, brick galleried London County Council (LCC) housing block. Other successful recent housing in the conservation area has employed a greater variety of materials, but they are broadly constructed from stock brick. The north side of Lant Street and the east side of Sanctuary Street are fronted by a number of characterful warehouses. Within this block bounded by Lant Street, Sanctuary Street, Marshalsea Road and Borough High Street the lane called Vineyard that winds through the block from Sanctuary Street is fronted by a number of late 19th and early 20th century warehouses.

3.4 On Marshalsea Road good quality late 19thc warehouse buildings can be seen at number 6-14 (even), on the north side of the road and 9 and 11, on the south side of the road. Meeting the Union Street Conservation Area 24 and 26 Marshalsea Road and 3, Quillip Street are good quality warehouse buildings which date to after the construction of Marshalsea Road. Industrial buildings are better represented in the core of the conservation area, particularly at the junction of Lant Street and Bittern Street and at the junction of Toulmin Street and Great Suffolk Street, south of Pickwick Street. The building to the east side of Toulmin Street is a particularly fine workshop with stone, quoined, arched entrance way with prominent keystone. The warehouse and courtyard arrangements are part of the areas historic development and this type of pattern is found within Borough, accessed from the main thoroughfares of Borough High Street and Great Suffolk Street,

3.5 The Libertine Public House on Great Suffolk Street is a fine three storey, purpose built public house dating from the mid 19th century. The Gladstone, on the south side of Lant Street, is also a later 19th century public house, and the sole surviving building to the south side. This has a good façade with glazed tiles, and timber fascia, plus sash windows and brick façade.

3.6 Charles Dickens School occupies the centre of the conservation area. This is a late Victorian board school built of stock brick with peg tiled roof. The roof is characterised by multiple gables in the north face. The school was expanded in 2017 to include a high quality contemporary extension.

3.7 The conservation area also includes in the Borough High street frontage between 196 and 230 (even) Borough High Street. Buildings of note within this frontage include 230 Borough High Street, which terminates the run of warehouses to the north side of Lant Street, 202-206, the 'timber framed' Trinity Public House with its steeply pitched roof, dormers and gable. Numbers 22 and 226 Borough High Street are good examples of the smaller buildings in tightly confined plots. Whilst the shop fronts are largely modern, the upper parts of the buildings, particularly brick-built 228, contribute to the streetscape. Number 222-224 is a fine red brick, three bay, four storey building with stone dressings which contributes positively to the character and appearance of the conservation area, as do the upper parts of 'Right Price Express'. The tightly knit development with courtyards behind the original burgage plots is a characteristic of Borough High Street as a whole, including the areas to the north and within the Borough High Street Conservation Area.

3.8 Overall, the broad **character of the conservation area** is a tightly knit urban realm, with high quality examples of historic and modern social housing, former warehouses, 19th century townhouses, some with commercial premises at ground floor, public houses and a large Victorian board school. The area was developed on the street layout surviving from the clearance of the 1888 slum dwellings. Together, the collection of buildings, streets and spaces form a small, yet distinct community character, contrasting with the extensively developed thoroughfares of Borough High Street and the former trading and commercial areas to the north of the conservation around Borough Market and the Thames.

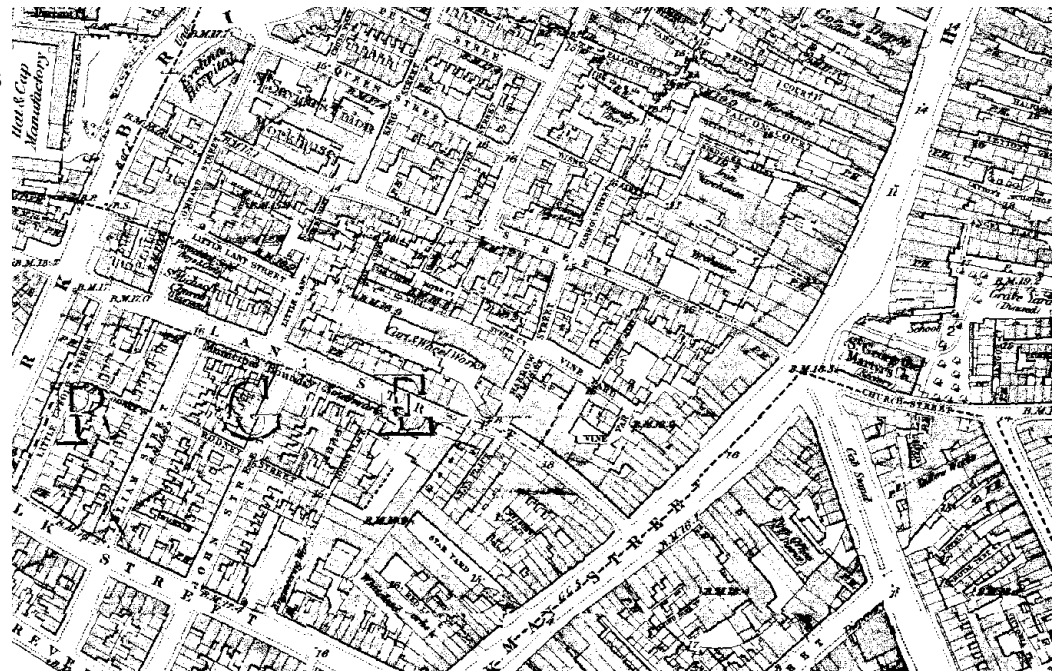
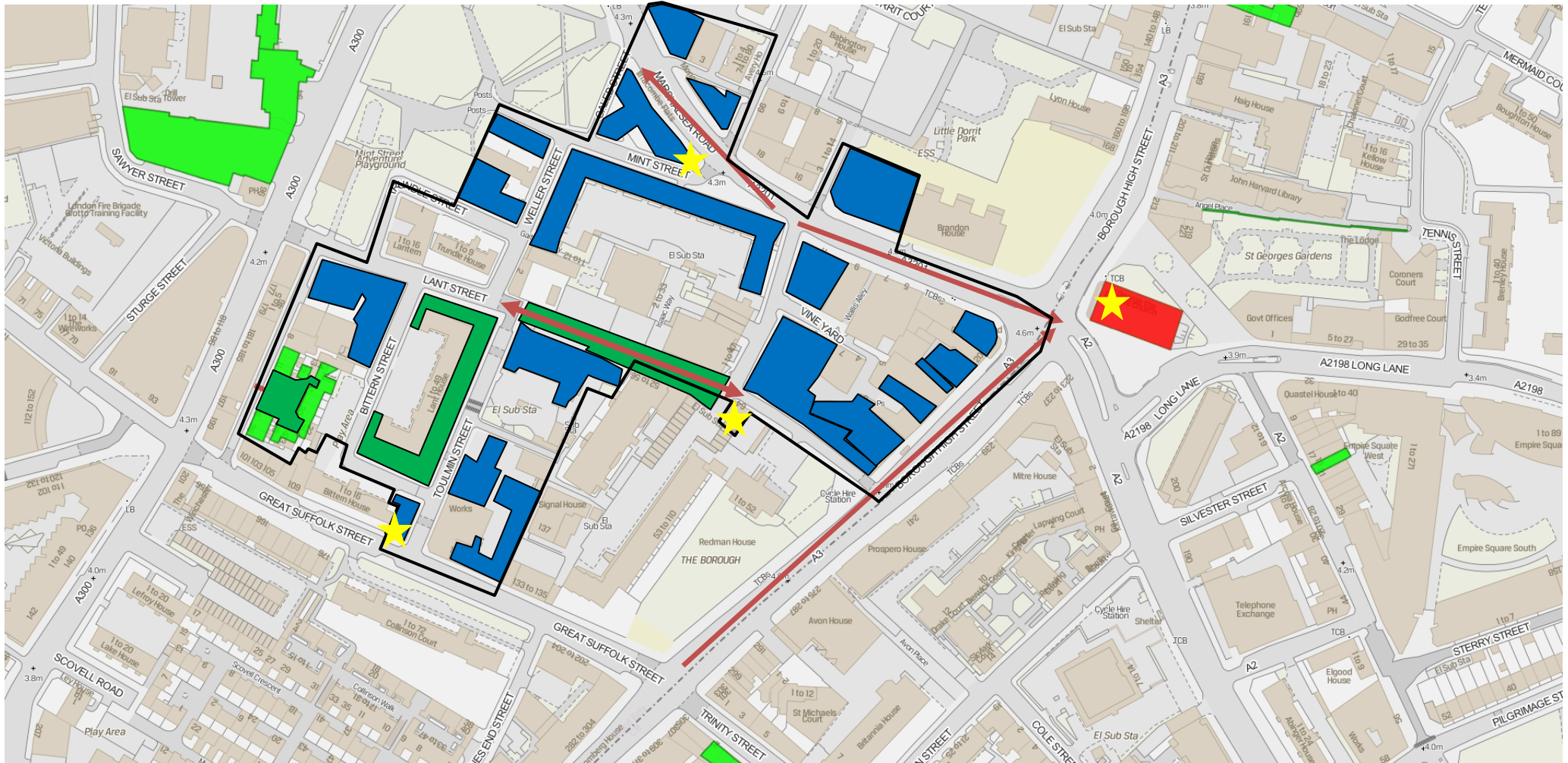








Figure 3: 1876



Figure 4: 1888

Figure 5: Map of features of special interest



- | | | | |
|---|--------------------------|---|-----------------------------|
|  | Key vista |  | Listed Building—grade II* |
|  | Landmark |  | Key open space |
|  | Listed building—grade II |  | Buildings of historic merit |

3.9 Character and Appearance of the Area

3.10 Definition of Special Interest/ Significance

The Liberty of the Mint Conservation Area contains a varied section of Southwark townscape broadly dating from the later 19th century. This consists of a mix of industrial, residential, educational, transport and historic, mixed-use buildings fronting onto Borough High Street. The area has a particular significance due to the rebuilding of much of the area with the construction of Marshalsea Road dating from 1888. The southern parts of the conservation area retain much of the Victorian character of closely packed former industrial and residential buildings defining a tight, well-defined townscape. There remains evidence of burgage plots and warehouse with courtyard layouts which is also found within other parts of The Borough. Archaeological investigations on the Brandon House site between 2011 and 2015 revealed several phases of complex Roman buildings as well as buildings comprising Suffolk Place. Some of these structures are now preserved *in situ* on the site. A large assemblage of terracottas that once adorned Suffolk Place were recovered from demolition deposits. This assemblage is of national importance and could enable a potential reconstruction of the building's elaborately decorated façade. The site is currently being considered by Historic England for addition to the schedule of ancient monuments.

3.11 Urban Morphology and Land Use

The conservation area is characterised by former industrial and warehouse buildings in close proximity to flat blocks and other buildings characteristic, including substantial residential mansion blocks of a late-Victorian, urban London. The primary streets of Borough High Street, Marshalsea Road and Great Suffolk Street bound the conservation area, with a smaller network of secondary and side streets in the interior. Generally, taller buildings are found on the primary streets, with less dense development in the interior. Open space, both public and private is found surrounding building plots rather than a general characteristic. The school in the centre of the street pattern has utilised some of the former path of Lant Street as a playground. However generally views across the area denote the linear east/west character of the lost street. Generally, the buildings are of one to five storeys, although floor to ceiling heights vary depending on the function of the building.

3.12 The area comprises of multiple dwellings, former warehouses and industrial buildings, now in mixed uses, two public houses and retail units with other uses above fronting onto Borough High Street. The conservation area also includes Borough Underground Station and Charles Dickens Primary School. There is little open space in the conservation area, although ancillary spaces are included in the street blocks where the residential blocks of Douglas Buildings and Lant House.

3.13 The setting of the conservation area

The conservation area is located within urban Southwark. It is bounded by Borough High Street, to the east, Mint Street Park to the west Great Suffolk Street, to the south, where the character and nature of the built heritage changes significantly. To the north the conservation area the Borough continues with fine warehouse buildings, and former burgage plot layouts of Borough High Street. St George the Martyrs church at the junction of Marshalsea Road, Borough High Street and Great Dover Street forms a prominent node and landmark, adjacent to the conservation area.

3.14 Character Areas

3.15 Marshalsea Road

Marshalsea Road, and the arrangement of Ilfracombe and Monarch Flats, as the street curves is a key space within the conservation area. Views towards St George the Martyr, are particularly special and this approach is a unique and historically purposeful realignment of streetscape during the 1880s to create a vista of the church and connection between Southwark Bridge Road and Borough High Street. The Victorian buildings on the northern side of Marshalsea Road (nos. 6-14, 16 -18, 20-22 and 23-26 also contribute positively to the townscape and their height and architectural details with commercial ground floor form a functional and featureful relationship with the street, and create a set piece of Victorian town planning. Marshalsea Road is a primary street within the townscape hierarchy of the conservation area.

3.16 Borough High Street

196 to 230 Borough High Street forms the eastern limit of the conservation area. From Borough Underground Station at the junction of Marshalsea Road south to the junction of Lant Street, the buildings front the street, with commercial uses at ground floor, and residential or office space above. With the exception of the station, the plot widths are characteristic of the medieval street frontages found in the northern section of Borough High Street – when buildings were first established they has small width frontages but were able to develop deep plots with rear courtyard access. This townscape is retained with the layout of Vine Yard, a service yard accessed via Sanctuary Street. The street block includes a public house (the Trinity) and this 1900s “Tudorbethan” building sits prominently in the street, positively contrasting with the taller Victorian and Edwardian Classically ordered buildings adjacent. Of particular note in the group is no. 222 to 224, another classically ordered building, with large portico and curved pediment. Borough High Street is a primary street within the townscape hierarchy of the conservation area and thus storey heights reach 6 storeys.



Figure 6: Marshalsea Road, looking east



Figure 7: Borough Underground station

3.17 Sudrey Street and Bittern Street

The block comprising Sundry Street and Bittern Street includes the grade II listed Gable Cottages, two storey arts and crafts almshouses, built by Elijah Hoole. For the Revd T Bastow, set around a mature garden facing towards Sundry Street. The intimate experience of the buildings and garden as a set piece is important to the character of the street and a provides a welcome and attractive contrast to the highly urban environment of the surrounding area. While the Shard tower is visible over the rooftops of the group, immediate surrounding building heights are respectful of this enclave of simple vernacular buildings with clay tiles pitched roofs, red brick ground floor and half timber and rendered upper floors.

3.18 The northern part of the Sudrey Street/Bittern Street block mostly comprises sensitively designed architecture, either contemporary commercial and apartment blocks using brick and timber cladding, or re-used former warehouse buildings or 1 to 3 storeys. These buildings front the street and their relatively smaller heights and plot sizes and together with the almshouses, form a simple side street within the hierarchy of the surrounding street network. Of particular note is 10-12 Lant Street, a former warehouse built in 1904 which retains its steel windows, double height timber archway doors and gable end with attractive roundel window. Number 10a also a former warehouse retains reconditioned steel windows, sack hoist, timber fascia and contemporary lattice metal entrance doors in a link back to the buildings' industrial past.

3.19 Toulmin Street

The centre of the conservation area is characterised by historic redevelopment and large buildings of 4-5 storeys; firstly the development of Charles Dickens Primary School in 1877 (formerly Lant Street school) was a significant change to the area, providing a purpose building educational building in the heart of the community. The principle elevation



Figure 8: Gable Cottages, Sudrey Street



Figure 9: Lant House, Toulmin Street

would have faced Lant Street and is of three tall storeys, with pitched roof and prominent gables. Bands of red London stock brick delineate the storey heights and contrast with the brown London stock, with later historic extensions in a lighter local brick. The modern extension links to the original rear of the building in similar, yet contrasting brick. The original building is clearly identifiable as a Victorian Board school, and has utilised the former route of Lant Street as a playground. While some of the historic street network has been lost to playground, views east/west have been left open and overall the architectural design of the historic school building, 2017 extension and continued use as community educational building contributes positively to the significance of the conservation area. An attractive seating area also contributes to the street scene, marking the break in built form between old and new.

3.20 The five storey 1950s block of flats known as Lant House is located on the west side of Toulmin Street. Set with mature gardens, the simple brick building with replacement sliding sash windows and gallery access via Bittern Street is typical of immediate post war housing redevelopment, aping a simple classical style, rather than the large concrete estates of the 1960s and beyond. Effort has been made to landscape the street frontages, especially to Toulmin Street and the trees on the Bittern Street car park side add interest to the environment.

3.21 The Libertine Public House, at 125 Great Suffolk Street is a Victorian public house, of three storeys with typical active ground floor with attractive timber shopfront and tiled stall riser, with sash windows above. The building is largely yellow stock brick with painted stone surrounds. The form of the building and its location at the junction of Toulmin Street creates a gateway to the centre of the conservation area, and suggests a heritage to the streets which is not apparent in the adjacent Bittern House (not within the conservation area). 127 Great Suffolk Street is a 20th century warehouse with metal windows, and brick piers, complementing the general character of warehouses in the area, although the concrete bands highlight the building as a late interpretation. It is however generally successful in it is compo-



Figure 10: Douglas Buildings, Mint Street



Figure 11: Modern plaque on Charles Dicken Primary School extension

sition and forms part of the overall character of the conservation area. The two storey Victorian building on Toulmin Street is highly attractive and includes metal windows, and bands of black and yellow stock brick, and prominent entrance fronting the street. Progressing north, the building details simplify however retain the warehouse/works character with large metal windows and an industrial appearance. Toulmin Street is a secondary street within the local network.

3.22 Lant Street/ Weller Street/Mint Street

Lant Street runs east/west through the centre of the conservation area. Its width suggest a once grand street, with the school and buildings at the corner of Borough High Street forming part of the wider historic network. The demolition of the Georgian terraces fronting the in the post WWII era give clues to the former hierarchical placement of the street; however today this has been somewhat lost. The central part of Lant Street from Bittern Street to Sanctuary Street is disconnected, partially by the use of the former route as a playground for the school, but also the 20th century redevelopment of Lantern House, Trundle House, Isaac Way and the Rise building. These have done little to assist in reinstating continuity within the townscape. Individually each building adds its own architectural stamp, from traditional post war housing (Trundle House) to modern loft living (The Lantern). The six storey block of flats at 2 Weller Street in black brick and render sits unfortunately alone in its slenderness and dominant use of render. The inner courtyards of Isaac Way are only glimpsed over the school gates.

3.23 The simple former warehouse and industrial buildings of 12, 13 and 14 Trundle Street and 14-15 Weller Street have largely been repurposed and retain much of their character in metal windows, and yellow stock brick with contrasting red. They enclose the street by fronting both Weller and Trundle street, although both streets remain secondary or side streets in the hierarchy of the network.



Figure 12: The Libertine Public House, Great Suffolk Street



Figure 13: The Gladstone public house, Lant Street

3.24 85 to 91 Mint Street

The only pre 1888 buildings left in Mint Street, this terrace comprises a three storey corner building (no. 85) and a four bay terrace of two and a half storey flats, with central doorway. The arrangement of no. 85 at ground floor suggests a former shopfront with decorative arched bay windows at first and second floor. The adjacent terrace ground floor arrangement suggests previously existing shopfronts, but simple sash windows have replaced the former shop window, but retaining the fascia and corbelling about. These details, along with the form and upper storey features tell story of a once busy Mint Street that nowadays is a simple side street, adjacent to Mint Street Park.



Figure 14: Lant Street



Figure 15: Mint Street

Section 4: Audit

4.1 Scheduled Monuments

The conservation area contains no scheduled monuments, however should the remains of Suffolk Place become scheduled, the likely boundary of this monument will enter the conservation area.

4.2 Listed Buildings

- Gable Cottages, Sudrey Street; - grade II

4.3 Key Unlisted Buildings and Building Groups

The main defining elements of the conservation area are groups of buildings that combine into frontages that define streets, spaces and views. Often this group value of buildings is as important as the individual characteristics of listed buildings, and the scale, containment and background character that they provide is essential to the character of the conservation area. The following buildings are of particular note:

- The Gladstone Public House, 64, Lant Street;
- Douglas Buildings, Peabody Estate, Marshalsea Road
- Charles Dickens School;
- Monarch and Ilfracombe Flats;
- 10 –12 Lant Street including 10a and 57-67 (odd) Lant Street;
- Langdale House, Marshalsea Road;
- The Libertine Public House, 125, Great Suffolk Street;
- Unit 1, 5, 6 and 7 at 127, Great Suffolk Street housed in the “Works” building fronting onto Toulmin Street;
- 12, 13 ,14 and 15 Weller Street
- 85 to 91 Mint Street
- 14 Trundle Street
- Borough Underground Station
- The Trinity public house, 202-206 Borough High Street
- 214-216, 222-224, 226, 228 and 230 Borough High Street

Section 5: Management and development guidelines

5.1 Introduction: Purpose of this guidance section

This section of the report draws out from the appraisal those themes that are essential to the conservation area's historical character, to which new development and improvement should pay heed. It is not intended to provide a perspective methodology for new design in the area or to exclude innovation.

5.2 It should also be noted that architectural style, in terms of the design of elevations, selection of materials, detailing and so on, is only part of the concern. Equally important are townscape issues of mass, overall form, building placement relative to the public realm, creation and presentation of views and vistas, quality of boundary treatments, and visual impacts of utility areas such as parking, servicing and site access.

5.3 Consulting Historic England

If the former Brandon House site is added to the schedule of monuments, works to the area of the Scheduled Monument any works may require Scheduled Monument Consent. Scheduled Monument Consents are managed by Historic England.

5.4 Consulting the Council

The Council's Design and Conservation Team should be consulted prior to undertaking any alterations to the exterior of buildings within the conservation area and it is likely that planning permission and /or conservation area consent to demolish will be required for most significant works. Where a building is listed, there are stricter controls on what the owner can and cannot do. Most works to a listed building, whether internal or external, will require listed building consent where they are considered to affect the special architectural or historic interest of the building. Replacement of listed structures will usually prove unacceptable, and replacement of unlisted structures will normally only be entertained where existing buildings do not make a positive contribution to the character and appearance of the conservation



Figure 16: Inappropriate UPVC windows on Lant House, Lant Street



Figure 17: Poorly maintained warehouse on Sanctuary Street

area and the proposal can be shown to positively preserve or enhance that character and appearance. If unauthorised work is carried out the Council can enforce against it.

5.5 The following guidance provides some indication of the most appropriate approach to common problems and development pressures within the area. It is always wise to seek advice from the Council's planning and conservation officers before considering any building work, including that which may affect trees and landscaping.

5.6 Environmental Improvements

The conservation area would benefit from a consistent treatment of the public realm in terms of paving materials. Consideration should be given to the re-introduction of traditional paving materials throughout the conservation area, especially in the more intimate core areas, including Mint Street, Toulmin Street and outside the almshouses at Sudrey Street.

5.6 Consideration should be given to the removal of satellite dishes, trunking and metre boxes on street elevations of buildings. Of particular note, the trunking on Charles Dickens Primary School, Lant House and 14 Trundle Street are particularly distracting to the overall architectural character.

5.7 Generally the upkeep of buildings in the conservation area is good. The semi dereliction of 57 Lant Street and the warehouse to the immediate north are of concern. These buildings retain some features of architectural significance, including warehouse doors and fenestration pattern, London stock brick facades and pitched roofs. Poor brick choices and boarded windows erode the street elevations, however overall the buildings are reminiscent of the industrial character of the conservation area.

5.8 Window and door replacements are easy upgrades to existing buildings. The design, material and opening methods of the original examples should be adhered to. Replacement windows on Lant House and Douglas Buildings have altered the traditional fenestration design.

5.9 Should proposals for replacement buildings be presented these should follow the scale of the buildings to be replaced. Proposals should also seek to preserve and enhance the character of the conservation area as outlined in this document.

5.10 Development form and urban morphology

5.11 Street and plot patterns

It is important that the overall form of development remains in keeping with the morphological characteristics of the area. The conservation area tightly defined urban area of central London. The buildings generally front directly onto the pavement. The area bound by Lant Street, Borough High Street, Sanctuary Street and Marshalsea Road and the block north of Gable Cottages are surviving areas of tightly-packed former industrial or warehouse buildings, as are 6-14 (even) Marshalsea Road. Other areas of the conservation area, whilst the building front onto the streets with small areas or light wells separating them.

5.12 Height and scale of new development

Scale and height varies over the conservation area, with some former warehouses displaying large foot prints, but only one or two storeys above ground: while there are examples of small footprints, with four or five storeys above ground and in residential use. Proposed development should follow cues taken from the adjacent buildings, however most development should not exceed the general maximum storey height of 4 to 5 residential storeys. There will be some locations where the scale and height of a proposal would adversely affect the character of the conservation area by altering its significance, as well as adversely affecting the setting of surrounded listed buildings and heritage assets. Where buildings of 4 to 5 storey are acceptable, the bulk of such building should be focussed on the primary streets, rather than the secondary street frontages. However in general, the area is not suitable for taller buildings.

5.13 Public Realm

In this context the public realm includes everything visible from publicly accessible areas, including both street spaces and any areas up to the front elevations of buildings. The essential components of the public realm that development and improvement should address are:

- Boundaries and frontages that define its edges;
- The surfaces and design of the space itself; and
- Trees, street furniture and other artefacts in the space.

5.14 Boundaries

Within the conservation area building generally front directly onto the street. Trundle House and Lant House both stand within their own grounds, whilst Gable Cottages are arranged around a grassed courtyard. Charles Dickens School stands within its own grounds, including the former line of Lant Street which has been incorporated into the school grounds.



Figure 18: Railings on Mint Street

5.15 Trees and Street Furniture

Reinstatement of traditional street furniture would help to strengthen the character of the area. Where replacement is necessary a co-ordinated approach should be taken to ensure a consistent and appropriate design throughout the area. Trees form a significant part of the street scene in Marshalsea Road and Toulmin Street. Where trees are protected by a Tree Preservation Order (TPO) or have a positive impact on the character of the they should be retained.

5.16 Improvements and repairs

5.17 Materials

Choice and use of materials can have a significant effect on the character and appearance of the conservation area. Care should be taken to ensure that original materials are retained whenever possible, and if replacements are necessary because of decay or damage, materials are chosen to match the originals as closely as possible in both appearance and performance. The predominant facing material in the conservation area is London yellow and red stock brick.

5.18 The use of natural, traditional materials will be encouraged. Artificial modern materials such as concrete tiles, artificial slates, UPVC windows etc. generally look out of place, and may have differing behavioural characteristics to natural materials. Some materials, such as concrete tiles, can lead to problems with the building's structure as their weight may exceed the loading for which the roof trusses and internal walls were designed. Where such inappropriate materials have been used in the past, their replacement with more sympathetic traditional materials and detailing, where possible, will be encouraged.

5.19 Maintenance

Repair works can prove costly and may require authorisation, which can cause delays. It is therefore far better to ensure that regular maintenance is undertaken, thus preventing unnecessary decay and damage and the re-



Figure 19: Douglas Buildings on Mint Street

sultant costs and problems. Works such as the regular opening of woodwork and timber, clearing out of debris in rainwater pipes and gutters, cutting back of vegetation in close proximity to buildings, repointing of failed mortar and re-fixing of loose roof slates are all in themselves relatively minor tasks that will not require authorisation but which may lead to much more complex and expensive works if left unattended.

5.20 Windows and doors

Where original elements exist they should whenever possible be retained in situ and repaired. All external joinery should be painted, which is the traditional finish. Most window frames are painted white, although white may not have been their original colour, however repainting in garish colours would be inappropriate. Darker “heritage” colours should be considered for doors, such as navy, maroon, dark green, black, etc.

5.21 Double glazing is only acceptable on unlisted buildings within the conservation area, where it matches accurately the appearance of the original windows in terms of detail design. If increased insulation is required then use of secondary glazing should be considered. Stick on glazing bars and trickle vents are considered unacceptable in the conservation area. The use of modern materials such as aluminium or UPVC is inappropriate, it is often impossible to replicate timber sash window as a double glazed units and not acceptable on historic buildings. Stick on glazing bars and trickle vents are also considered unacceptable and incongruous features. Where the existing windows or doors are however later alterations they determinably affect the character or appearance of a building, the Council will consider their replacement with appropriate traditional design. The conservation area has some significant characteristics of metal windows and doors which denote the areas industrial heritage. These should be retained and maintained. Where past their economical life span, they should be replaced in a like with like design.

5.22 Roofs

Where possible, original roof coverings should be retained and if necessary repaired with slate to match the existing. Traditional natural slate is preferred over reconstituted or substitute materials. Where re-roofing is unavoidable because of deterioration of the existing roof covering or inappropriate later works, the use of natural slate will usually be required. The use of more modern materials such as concrete tiles and artificial slate is unacceptable on 19th century buildings, and their greater weight can lead to damage and deterioration of the roof structure if inappropriately used. Natural roof slates should be used on listed buildings and either natural or good quality reconstituted slate on the 19th century/ early 20th century unlisted buildings in the conservation area. Natural slates have a better appearance and weather gradually and evenly over time: most artificial slates weather badly with streaking and leaching of colour and adverse effects on the overall appearance of the building.

5.23 Where they exist, original chimney stacks and pots should always be retained and repaired if necessary. The reinstatement of appropriately designed replacement chimney pots where these have been lost will be encouraged.

5.24 Brickwork

Brick is the predominant facing material in the conservation area. Local London stock brick and a lime based mortar should be used to repair any defects to historic buildings. The painting or rendering of original untreated brickwork should be avoided and is usually considered unacceptable. Where damaged bricks are to be replaced or new work undertaken, bricks should be carefully selected to match those existing on

texture, size colour and should be laid in an appropriate bond to match the existing.

5.26 The most dominant visual components of the brick façade are the bricks themselves, rather than the pointing. Traditional bricks were a slightly larger format than metric bricks and were often laid in softer lime based mortar in a thinner bed, which reduced the appearance of the joints relative to the bricks. Re-pointing should only be undertaken where necessary to prevent further damage to a building's structure and should be kept to a minimum. Usually, lime based mortar mix no stronger than 1:1:6 (cement: lime: sand) is recommended and this should be coloured with sand to match the original mix. Joints should be flush or slightly recessed (not weather struck or raised) finished neatly and cleanly with the mortar brushed back to expose the edges of adjacent bricks.

5.27 Cleaning of brickwork is a specialist task, which may dramatically alter the appearance of a building. If undertaken incorrectly cleaning may lead to permanent damage to the bricks and ultimately the structure of a building. Advice should be sought from the Council.

5.28 Rainwater goods

Gutter and downpipes are of a standard style, originally in cast iron. Problems may occur with cracked pipes, blockages and broken fixings. Regular maintenance will minimise these defects. Repairs and renewal should preferably be in cast iron on the 19th and 20th century buildings. This is readily available and provides a better long-term investment than fibreglass or plastic. Where blockages may occur due to adjacent foliage this can be readily and economically prevented by the installation of simple mesh guards.

5.29 Satellite dishes

It is a condition of installing a dish that you must site it in such a way that minimises its impact on the external appearance of the building and remove it when it is no longer needed. Multiple dishes on the facade of buildings are considered harmful to the conservation area. Should the antenna or satellite dish exceed 70cm and be placed in a visible location to the front elevation or on the chimney, planning permission will always be required. To minimise the visual impact of the equipment on the conservation area, the acceptable locations for siting a satellite dish are as follows:

- concealed behind parapets and walls below ridge level;
- set back on side and rear extensions;
- set back on rear roofs below ridge level; or
- located on the rear elevation
- installed where inter interference can be expected by trees.

5.30 Where tree pruning is required of privately owned trees an application will need to be submitted for works to protected trees and those within conservation areas. Reception of satellite TV is not a valid reason for pruning of publically owned or managed trees.

5.31 Renewable Energy

Micro-generation is the production of electricity and heat from the wind or the sun. Micro-generation systems include: photovoltaics, solar hot-water panels, wind turbines and heat pumps.

5.32 Where owners of buildings within the conservation area are considering the installation of a micro-generation system, thought should be given to protecting the historic fabric and character of the area. Prior to installation, check with the council as to whether planning and/ or listed building consent is first required for the work. Key points to consider are:

- equipment should be installed away from principal elevations or dominant roof slopes;
- the cumulative visual impact of the equipment on one or group of buildings within the conservation area;
- wherever possible panels which sit flush with the roof covering should be used rather than framed systems;
- ensure that the impact of the equipment on the setting of the heritage asset (listed building and/ or conservation area is minimised by the: location, size, colour and reflectivity of the system selected ;
- structural impact on the historic building of the installation of a micro-generation system; and
- new pipe work, cables or excavations association with the micro-generation system should cause the least amount of damage to the historic building and should wherever possible be fully reversible;
- equipment should not be installed where interference can be expected by trees. Where pruning is required of privately owned trees an application will need to be submitted for works to protected trees and those within conservation areas. The growth potential and increase in size of adjacent trees must be taken into consideration when determining the location of any equipment, including the presence of tree roots where heat pumps are proposed.

Useful Information

General advice concerning works in conservation areas and the planning process can be obtained by visiting the Southwark Council website:

<http://www.southwark.gov.uk/planning-and-building-control/design-and-conservation>

Useful telephone numbers

General Planning Enquiries 0207 525 5438

Conservation & Design, (including archaeology and arboriculture) Team 0207 525 5448

Compliance and Monitoring 0207 525 5419

Building Control 0207 525 5582

Other useful contacts

Historic England 0870 333 1181 <http://www.historicengland.org.uk>

The Society for the Protection of Ancient Buildings 0207 377 1644 www.spab.org.uk

The Victorian Society 0208 9941019 <http://www.victoriansociety.org.uk>

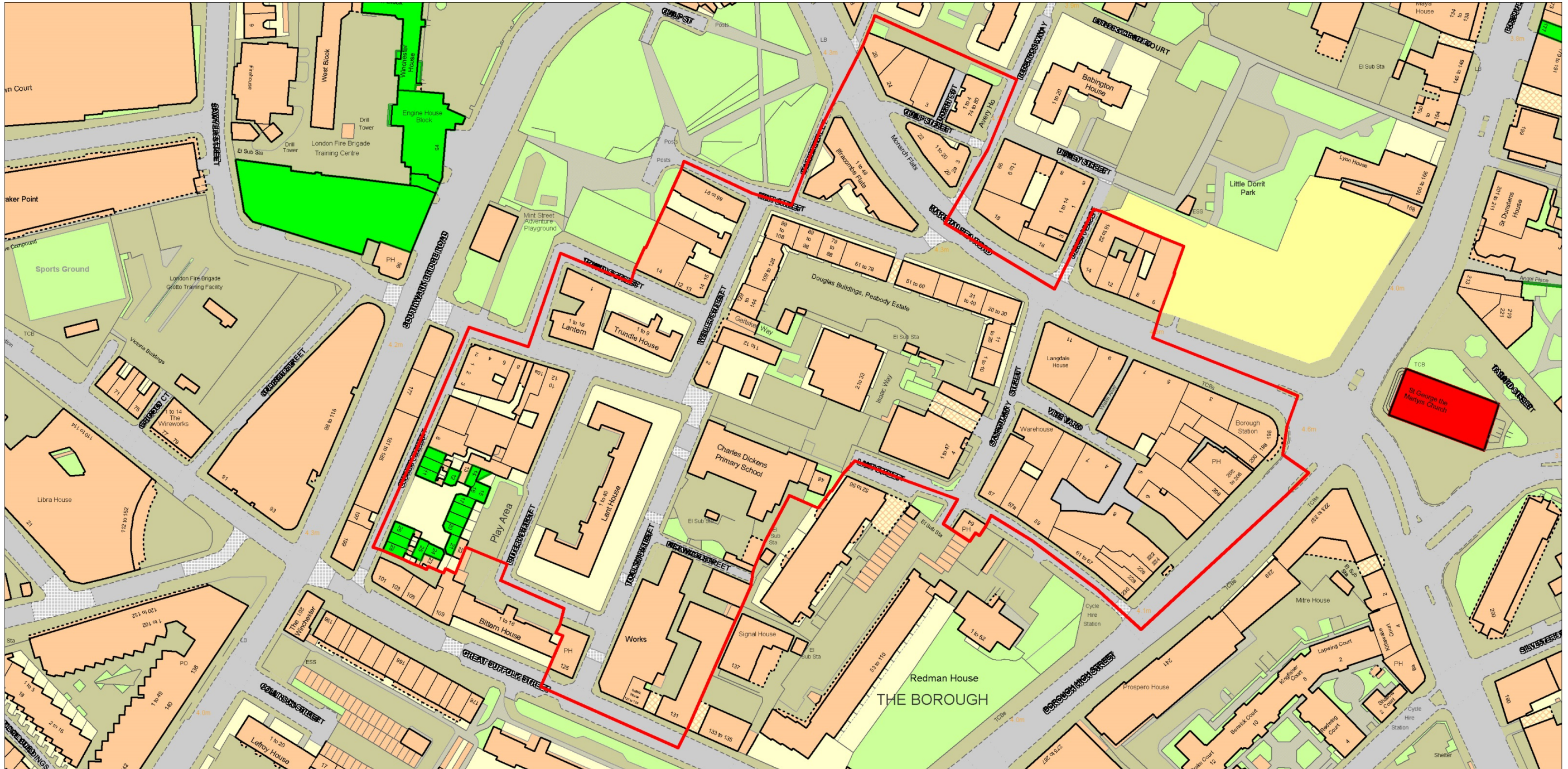
The Council for British Archaeology 0190 467 1417 <http://www.britarch.ac.uk/>

Ancient Monuments Society 0207 236 3934 <http://www.ancientmonumentsociety.org.uk/>

The Georgian Group 08717502936 <http://www.georgiangroup.org.uk/>

The Twentieth Century Society 020 7250 3857 <http://www.c20society.org.uk/>

The London Tree Officers Association 020 7974 4124 <http://www.ltoa.org.uk/>



The Liberty of the Mint Conservation Area

APPENDIX 3

EqIA

MEETING:	Planning Committee	Date:	27 Nov 2018
ITEM TITLE:	Liberty of the Mint Conservation area		
REPORT AUTHOR: Contact name, number and email address	Catherine Jeater, 020 7525 5375 Catherine.jeater@southwark.gov.uk		
JOB TITLE & DEPARTMENT	Senior Design & Conservation Officer Place and Wellbeing		

SUMMARY OF CONTENT

A description of the effect of a new conservation area in the Marshalsea Road area of the borough. The ways that equalities issues may impact on different groups of people have been highlighted.

KEY ISSUES

- The methods used to involve and engage people affected by the proposed new **Liberty of the Mint** Conservation Area needs to be accessible to all.
- The adoption of the **Liberty of the Mint** Conservation Area Appraisal and Management Plan may impose additional planning requirements for those seeking to make alterations to their properties, which may have an impact on those on lower incomes such as lone parents, disabled people, the BME community and the elderly.

DECISIONS REQUIRED:

- Comment on the main issues raised in this assessment
- Comment on the areas to be focused on at stage two.

**LIBERTY OF THE MINT CONSERVATION AREA
EQUALITIES IMPACT ASSESSMENT
Stage One: Scoping**

1. What policy, strategy or plan is this assessment addressing?

The proposed new Liberty of the Mint Conservation Area Appraisal and Management Plan assesses the significance of the conservation and advises on proposed changes to existing buildings and new development within this area.

The proposed Liberty of the Mint Conservation Area Appraisal and Management Plan will be assessed in accordance with statutory regulations and in close consultation with the local community and Historic England. The conservation area appraisal is in general conformity with national and regional guidance and policy and contribute towards meeting local needs. The council's policies and strategies are evidenced to ensure that they are robust, meet local needs and can be justified.

2. Is this a new or an existing policy/strategy?

This is a new policy. The proposed new Liberty of the Mint Conservation Area Appraisal and Management Plan will form part of the council's Local Development Framework, which contains all of the council's planning policies and will be used to guide the design and appearance of development in the designated area and in the determination of planning applications.

3. If existing, has the policy/strategy already been reviewed under the previous EqIA programme? If so, what were the findings to come out of this and has the agreed action plan been implemented? What has changed since the last assessment was undertaken (in terms of context, nature of the policy/strategy or the type of people affected by the policy/ strategy).

- No, this policy has not been previously reviewed under a previous EqIA.

This EqIA has been carried out in accordance with the Equalities Act (2010) which identifies the following groups with protected characteristics:

- Age.
- Disability.
- Gender reassignment.
- Marriage and civil partnership
- Pregnancy and maternity.
- Race.
- Religion or belief.
- Sex.
- Sexual orientation.

4. What do you think are the main issues for your policy or strategy in relation to equality, diversity and social cohesion?

Community and Stakeholder Involvement

The Planning (Listed Buildings and Conservation Areas) Act 1990 does not oblige the council to consult on its decision to designate a conservation area however, the council will consult with the occupants of properties in the designated area in accordance the council's adopted Statement of Community Involvement (SCI). The SCI sets out how and when Southwark Council will involve the community in the preparation of planning documents and on applications for planning permission in the borough.

National policy states that if the evidence suggests that the heritage asset may have a special significance to a particular community that may not be fully understood from the usual process of consultation and assessment, then the local planning authority should take reasonable steps to seek the views of that community.

The council will endeavour to do this, however there are a number of issues to be considered in this regard:

Considerations:

- Certain groups may not be able to access information and consultations as easily as others i.e. disabled people, those who do not have English as their first language, young people, those who support vulnerable people such as women who are more likely to care for children, older people and those with limiting illnesses.
- Certain groups may not feel comfortable expressing their views in public due to fear of discrimination such as people from the LGBT community, faith groups, young people and the BME community.
- People may not feel safe in attending public information or consultation events at certain times of the day, in particular after dark, such as older people and women
- Events may clash with times of religious observance and therefore we need to take into account people's faiths.
- Information may not be presented in a way that engages people effectively, such as material only printed in English, or information presented in a complicated format or language.
- Certain groups may not understand the relevance of the proposed Liberty of the Mint Conservation Area and the conservation area appraisal to them and therefore they do not become involved in the process.
- Certain groups may have a negative perception of the council or disappointing experiences of community consultations which stop them becoming involved in the process.
- If people do not feel that they can access information at an early stage or have problems accessing it, they may become disillusioned in the process and lose interest i.e. BME groups, young and elderly people and disabled people.
- Some people may not be aware how to express their views or how these will feed into the process i.e. children and young people.

- There may be differences in the needs and aspirations between different groups which may result in conflict.
- People may feel as though certain groups are having a greater influence on how development of the Liberty of the Mint Conservation Area.

We have consulted in a way that will prioritise the needs of people in the area including public meetings and direct communication with the occupants of properties in the proposed conservation area, local groups and businesses in the area. These methods are:

- Draft appraisal available on the website for comment
- Mailshot inviting comment to all addresses in the conservation area
- Public meeting
- Gathered consultation responses from statutory bodies and local amenity and community groups

Design and Heritage

The adoption of the Liberty of the Mint Conservation Area Appraisal and Management Plan may impose additional planning requirements for those seeking to make alterations to their properties. The wider area is expected to undergo significant change through the development. This will see increased investment and development activity, which provides significant opportunities to improve the built environment in the area.

We see the designation of the proposed new Liberty of the Mint Conservation Area as contributing to the enhancement of the area because we value its distinctive historic character. Consideration should be given to the following issues in the development and implementation of policies for design and heritage:

Considerations

The pattern of development

- The conservation of features of the area for heritage and conservation purposes may change the pattern of development because, in addition to new development within the conservation area, traditional features and existing buildings will need to be preserved which may provide a different range of opportunities for creating new jobs and housing for those that are seeking employment or better quality housing.

Improved quality of design

- High quality design standards will improve the appearance of the area but may result in higher costs for SME businesses i.e. by having to provide high quality shop fronts and other alterations including windows and doors.

Improved public realm and environmental quality

- Improvements to the public realm and the environmental quality of the area will widen access to the area and will help to address the needs of people who continue to feel threatened walking through the area such as members of certain faith groups, members of the BME community, young people, disabled people, older people and women.

The proposal to designate the area as a conservation area places a higher priority on the quality and design of the built environment which we feel will help to drive forward wider improvements for residents and businesses in the area

Stage two: Assessment of Impacts

Part A: Feedback from the Equalities and Diversity panel

1. What feedback did the panel give you at stage one

The adoption of the Liberty of the Mint Conservation Area Appraisal and Management Plan has not been presented to the Equalities and Diversity panel as it was not considered to be a necessary requirement. There is no statutory obligation on the council to consult on the adoption of a new conservation area appraisal however as discussed earlier the appraisal will form part of the council's Local Development Framework. This document will be consulted on in line with the council's adopted SCI and will also be subject to its own equalities impact assessment.

Part B: Purpose and aims of policy/strategy

2. What is the overall purpose of the policy/ strategy?

The Liberty of the Mint Conservation Area appraisal and Management Plan will be part of Southwark's Local Development Framework. This will be an important document which will be used for deciding what sort of development should take place within the conservation area.

3. What are its aims?

The aim of the Liberty of the Mint Conservation Area Appraisal and Management Plan is to assess the significance of the area, and advise on the appropriateness of further development in the area around Liberty of the Mint as defined by the map, as an area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance.

4. Could these aims be in conflict with the Council's responsibility to:

- Eliminate discrimination
- Promote equality of opportunity
- Promote community cohesion and good relations between different groups

Stage 1 of this EQIA identifies a number of key considerations which have been acknowledged and addressed in the stage two assessment as follows:

The pattern of development

- The built environment and the public realm may continue to ignore the needs of disabled people which results in creating barriers to inclusion in

the wider community and opportunities to decent housing, jobs and access to leisure and community facilities. The designation of a conservation area will not restrict improvements to buildings and the public realm to meet the needs of disabled people from the wider community.

- Existing larger houses within the proposed conservation area will be protected helping to ensure that families can stay within the area alongside its wider regeneration

Improved quality of design

- The protection of areas for heritage and conservation purposes may limit development which may limit the opportunities for creating new jobs and housing for those that are seeking employment or better quality housing. One purpose of the conservation area appraisal is to help maintain a wide choice in housing stock and will help to ensure all people will have access to suitable housing stock and this includes all groups with protected characteristics.

Improved public realm and environmental quality

- i.e. If the public realm and the environmental quality of the area remain poorly designed, certain groups may continue to feel threatened walking through the area such as members of certain faith groups, members of the BME community, young people, older people and women.
- Different groups may have different priorities for how buildings and the public realm is designed to meet their needs. Tensions could arise if there is the perception that one groups needs are being prioritised over others i.e. older people and young people. The designation of a conservation area appraisal will mean that public realm improvements will need to be more widely consulted and will require better quality materials and finishes which will benefit all local residents including all groups with protected characteristics

5. Does the documentation relating to this policy/strategy include specific reference to the Council's responsibility (as set out above) and a commitment to work to meet this?

While the council's responsibility for eliminating discrimination and promoting equality of opportunity and social cohesion are not specifically referred to as part of the process for designating a new conservation area, the aim of this process is to create attractive and distinctive places for all which are safe, easy to get around and a pleasure to be in by valuing the distinctive historic environment of the Borough.

Part C: Application of this policy/strategy

6. What steps are you taking or will you take to ensure that the policy is or will be implemented consistently and fairly?

The appraisal of the Liberty of the Mint Conservation Area will mean that planning applications for developments within the conservation area, will need to 'preserve or enhance' the character and appearance of the conservation area and be in broad compliance with the document. New development will need to respect the context of the conservation area, having regard to the content of the conservation area appraisal, propose appropriate materials, preserve traditional features of the area and do not introduce design features or materials that are out of character with the area.

7. Could the way that this policy/strategy is being or will be implemented be discriminating against any particular individuals or groups or be potentially damaging to relations between different groups?

The adoption of the Liberty of the Mint Conservation Area appraisal and management plan will contribute to eliminating discrimination, promoting equality of opportunity and promoting social cohesion and good community relations.

8. What changes could you make to either the policy/strategy itself or the way it is applied to improve the positive outcomes for all groups and to reduce or eliminate any negative outcomes?

The findings of the EqIA scoping have been considered and this has informed the stage 2 assessment. The stage 2 assessment sets out those areas where the designation of the Liberty of the Mint Conservation Area may have differential impacts and where appropriate mitigation measures are proposed to address these.

9. What information do you collect or do you plan to collect to monitor the impact of this policy/strategy on different groups?

Monitoring of planning applications

Planning applications are monitored by the council in its Annual Monitoring Report (AMR). This includes, among other things, the area of the borough that is designated as a conservation area.

Annex 3: Related projects and EQIAs

The Southwark Plan

Key findings:

- Provision of small local businesses which are easily accessible by local communities encourages the closure of development gaps for the local communities through an increased sense of belonging, redressing disadvantage and equality of access to services.
- By ensuring that new developments are safe and secure, disadvantage is addressed, community relations are improved and equality of opportunity is promoted.
- Protection of residential accommodation reduces discrimination and promotes equality of opportunity through providing inclusive and accessible housing for communities within the borough.
- Provision of accommodation other than houses and flats recognises the diverse needs of communities within the borough and promotes equality of opportunity since communities that will benefit are frequently the marginalized.
- The protection of transport impacts creates a sustainable, inclusive and accessible borough for its residents, future residents, users and occupiers.
- Public transport improvements assist in the creation of an accessible and inclusive borough by focusing on sustainable forms of transport as well as being socially inclusive. Accessible and inclusive transport links promote equality of opportunity and prevent barriers of exclusion and discrimination.
- Mini cab offices in the borough make transportation in the borough accessible to those who may not have access to public transport or private car use.

Core strategy

Key findings:

- By requiring the maximum amount of affordable housing possible across the whole of the borough, this should have a positive impact on all equality groups and help to promote equality of opportunity by offering affordable housing across the whole of Southwark.
- Allowing student housing only in the town centres and in areas with good access to public transport services, this may promote cohesion between different groups as student housing will be located in the areas most suitable to accommodate it.
- Setting out criteria for how we may allocate gypsy and traveller sites in the future may improve community cohesion and good relation by making sure that new sites are located in suitable areas.
- Protecting employment sites should have a positive impact on discrimination and opportunity by increasing the amount of jobs in the borough and protecting the jobs already there. Through our employment and enterprise strategies we will work to ensure that these jobs are suitable for all of the different groups in the community.

- The Core Strategy aims to facilitate a network of community facilities that meet the needs of local communities. This should help to improve community cohesion and ensure that community facilities are easily accessible so that everyone can benefit from access to a range of community facilities.

Southwark 2016

Key findings:

- Migration in and out of the borough is high: this makes it difficult to measure the success of interventions (because the beneficiaries may have moved on and another, more disadvantaged group, taken their place). It is also makes it more difficult to predict the composition of the borough over the next 10 years.
- Southwark's population will continue to grow so that by 2016 it could be between 286,000 and 301,000. That means anything from 14,000 to 20,000 more households than in 2001.
- By 2016 around 43% of the population is expected to be from black and minority ethnic backgrounds, with many different faiths and cultures.
- Southwark's population ranges from those who enjoy significant affluence to those in severe poverty. Southwark is becoming more socially and geographically divided.
- We have a 10% gap in the numbers of people of working age (16-74) in Southwark who are in employment compared to the national average. In that age group, 65% have no or first level NVQ qualifications, rising to over 80% for people of Bangladeshi and Black Caribbean origin.
- 39% of local authority homes and 40% of private rented properties do not yet meet the decent homes standard.

Item No. 7.	Classification: Open	Date: 27 November 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	16 November 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			16 November 2018

ITEMS ON AGENDA OF THE PLANNING COMMITTEE
on Tuesday 27 November 2018

Appl. Type Full Planning Application
Site BURGESS BUSINESS PARK, PARKHOUSE STREET, LONDON, SE5 7TJ

Reg. No. 17-AP-4797
TP No. TP/2236-2
Ward Camberwell Green
Officer Victoria Lewis

Recommendation GRANT SUBJECT TO LEGAL AGRT, GLA AND SOS
Proposal

Item 7/1

Demolition of the existing buildings and redevelopment of the site to provide 499 residential units, up to 3,725sqm (GIA) of Class B1 commercial floorspace, up to 128 sqm (GIA) of Class D2 leisure floorspace and up to 551sqm of Class A1-A3 floorspace within 13 blocks of between 2-12 storeys, with car and cycle parking and associated hard and soft landscaping.

Appl. Type Full Planning Application
Site LAND AT 313-349 ILBERTON ROAD, LONDON SE15

Reg. No. 17-AP-4819
TP No. TP/2327-349
Ward Old Kent Road
Officer Tom Buttrick

Recommendation GRANT SUBJECT TO LEGAL AGREEMENT AND GLA
Proposal

Item 7/2

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

(This application represents a departure from strategic policy 10 'Jobs and businesses' of the Core Strategy (2011) and saved policy 1.2 'strategic and local preferred industrial locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location).

Original description: Mixed use redevelopment comprising, demolition of existing buildings and construction of two buildings: one of part 11 and 13 storeys and one of part 13 and 15 storeys to provide 1,888sqm (GIA) of commercial floorspace (use class B1) at part basement, ground and first floors, 130 residential dwellings above (51 x 1 bed, 52 x 2 bed and 27 x 3 bed), with associated access and highway works, amenity areas, cycle, disabled and commercial car parking and refuse/recycling stores.



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Item No. 7.1	Classification: Open	Date: 27 November 2018	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 17/AP/4797 for: Full Planning Application Address: BURGESS BUSINESS PARK, PARKHOUSE STREET, LONDON, SE5 7TJ Proposal: Demolition of the existing buildings and redevelopment of the site to provide 499 residential units, up to 3,725sqm (GIA) of Class B1 commercial floorspace, up to 128 sqm (GIA) of Class D2 leisure floorspace and up to 551sqm of Class A1-A3 floorspace within 13 blocks of between 2-12 storeys (max AOD height 41.95m), with car and cycle parking and associated hard and soft landscaping.		
Ward(s) or groups affected:	Camberwell Green, St Giles and Faraday		
From:	Director of Planning		
Application Start Date 26/01/2018		Application Expiry Date: 18/05/2018	
Earliest Decision Date 21/10/2018		Time Extension Date: 27/05/2018	

RECOMMENDATION

1. That planning permission be granted, subject to conditions and the applicant entering into an appropriate legal agreement by no later than 27th May 2019 and subject to referral to the Mayor of London and the Secretary of State.
2. That environmental information be taken into account as required by Regulation 3(4) of the Town and Country Planning (Environmental Impact Assessments) Regulations 2011 (as amended).
3. That following the issuing of the permission, the Director of Planning place a statement on the Statutory Register pursuant to Regulation 24 of the Town and Country Planning (Environmental Impact Assessments) Regulations 2011 which contains the information required by Regulation 21, and that for the purposes of Regulation 24(1)(c) the main reasons and considerations on which the planning committee's decision is based are as set out as in the report.
4. In the event that the requirements of (a) are not met by 27th May 2019, that the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 309 of this report.

EXECUTIVE SUMMARY

5. This is a major application which seeks to redevelop a declining industrial estate to provide a mixed-use commercial and residential development. The site is located in a local Preferred Industrial Location and there would be a significant loss of B class floorspace as a result of the proposal, although much of the space is currently vacant and is of poor quality. The provision of different quantum of commercial floorspace within the development have been tested, and the proposal before Members is the option which would be able to deliver the most affordable housing. The applicant has committed to providing 35% affordable housing equating to 173 units, with a policy compliant tenure split of 70% social rented and 30% intermediate.

6. The application is accompanied by an Environmental Statement which identifies adverse effects during demolition and construction which to an extent could be mitigated by way of construction management measures, and on daylight and sunlight to neighbouring properties. The proposal would include buildings of up to 12-storeys in height and would be of a high quality of design. Whilst there would be some less than substantial harm to the setting of the grade II listed former Church of St George, this is considered to be outweighed by the benefits arising from the proposal including an increase in jobs at the site, high quality new commercial floorspace, and new housing including affordable housing. A policy compliant mix of dwellings and wheelchair housing would be provided, together with a good standard residential accommodation. The proposal would require the removal of 9 trees from the site, although 39 new trees would be planted, to supplement high quality new landscaping. The daylight and sunlight impacts are noted, but it is not considered that the impact upon local amenity would outweigh the benefits of the proposal; sound proofing within the new dwellings would limit the potential for noise complaints against existing commercial occupiers. The proposal would provide 15 accessible parking spaces, and future occupiers would be prevented from obtaining parking permits on the surrounding streets. Whilst the proposal would result in additional vehicle trips, these would not adversely impact upon the surrounding highway network and a s106 contribution would be required in the event that overcrowding were to occur on local busses. The proposal would incorporate measures to reduce its carbon dioxide emissions, and a contribution to the Council's Carbon Off-set Green Fund would be secured through a s106 agreement. The proposal would be air quality neutral, and conditions are recommended to ensure that ground contamination, surface water drainage, archaeology and ecology would be adequately dealt with. A range of s106 obligations would be secured, including relocation support for an existing business. Overall, the benefits of the proposal are considered to outweigh the potential harm caused, and it is recommended that planning permission be granted, subject to conditions, a s106 agreement and referral to the GLA and Secretary of State.

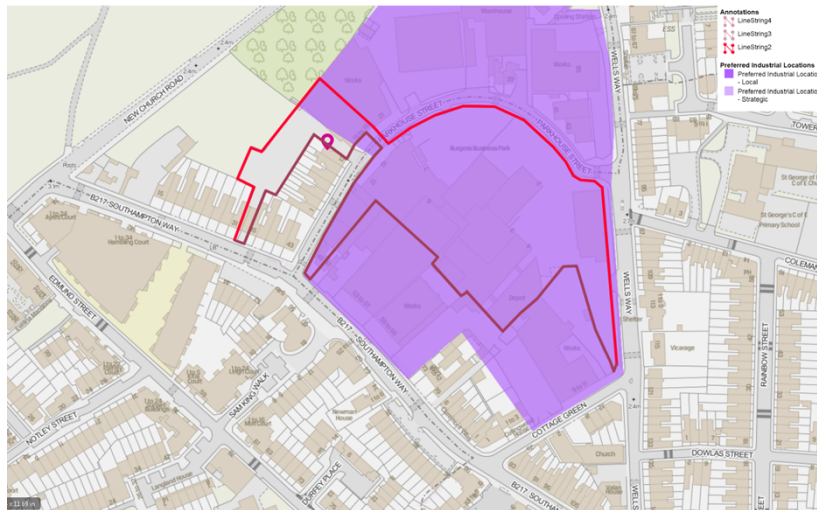
BACKGROUND INFORMATION

Site location and description

7. The site is located on the north-eastern side of Southampton Way and measures 1.59 hectares (ha). Parkhouse Street forms a loop off Southampton Way and connects with Wells Way to the east. The site sits within that loop and

also extends to the northern side of Parkhouse Street, adjoining Burgess Park beyond. It currently contains buildings within office, light industrial and storage use, 33 and 45 Southampton Way which are in residential use, and a large brick chimney. Whilst the site is in a predominantly industrial area, the site adjoins residential uses on Southampton Way and Parkhouse Street and there are houses on the opposite side of Wells Way.

8. The site is within the setting of a number of heritage assets including the grade II listed Collingwood House on Cottage Green and 73, 75 and 77 Southampton Way. In addition, the proposed development could affect the setting of a number of heritage assets including the grade II Listed 113 Wells Way, the Wells Way Baths, the former Church of St George on Wells Way, and the Addington Square Conservation Area which is to the west across Burgess Park.
9. The site forms part of the Parkhouse Preferred Industrial Location which is of local importance, and this designation extends beyond the site boundaries to include the surrounding industrial sites. The site has a public transport accessibility level (PTAL) of 2 (low).



Site boundary in relation to wider PIL designation

Details of proposal

10. Full planning permission has been sought by Peachtree Services Ltd. for a comprehensive mixed-use redevelopment of the site which would be known as Camberwell Union. 33 and 45 Southampton Way, the chimney and a building next to 13 Parkhouse Street would be retained, but all other structures on the site would be demolished. The proposal is for A1/A3 (retail/café/restaurant), B1 (business) and D2 (leisure) class floorspace and 499 residential units, laid out in a series of 13 buildings ranging from 2-12 storeys in height. The existing and proposed floorspace figures are set out below:

Table 1

Land use	Existing GIA sqm	Proposed GIA Sqm	Net difference GIA sqm
A1/A3 (retail)	0 sqm	551 sqm	+ 551 sqm
B1 (business)	12, 559.3sqm	3,725 sqm	-8,834.3 sqm
C3 (residential)	135sqm	45,928 sqm	+45,793
D2 (leisure)	0 sqm	128 sqm	+ 128 sqm

11. Most of the development would be located on the larger, southern part of the site which sits to the south and west of Parkhouse Street and Wells Way, with two blocks located on the smaller part of the site which adjoins Burgess Park. On the larger part of the site the blocks would be arranged around a broadly L-shaped central street which would start close to the junction of Wells Way with Parkhouse Street leading south-west, and would then turn north-west connecting with Parkhouse Street. There would be a smaller, secondary street (described as The Mews) leading from Parkhouse Street to the new central street.



Site layout

12. Blocks A and B – These blocks would be located on the smaller, northern part of the site which adjoins Burgess Park. Block A would be a 2-storey terrace comprising 5 x 3-bedroom houses measuring a maximum of 6.4m high with a flat roof. Block B would be formed from an existing 2-storey plus basement commercial building which would be retained and extended by 3-storeys (to a maximum height of 18m) to provide an energy centre in the basement, B1 class floorspace on the ground floor and 20 flats above; new openings including balconies would be provided in the side elevations of the building.
13. Both blocks could be accessed from a gated route off Parkhouse Street or via a secondary pedestrian from an existing haulingway at 33 Southampton Way. There would be seven accessible car parking spaces in this area.
14. Block C – This would be located opposite 1-11 Parkhouse Street and would be 3-storeys high (10.6m) with a flat roof. It would comprise employment space on the ground floor and 6 flats above, all of which would be social rented units.
15. Blocks D and E– These adjoining blocks would be located on the south- western side of the new central street and block D would partly turn the corner onto Parkhouse Street. Both blocks would be 8 storeys high (26.8m) with the top two floors set back and would comprise B1 class floorspace on the ground floor and flats above (28 flats in block D and 31 in block E, all social rented). Block D would have a communal terrace at 5th floor level facing Parkhouse Street and

block E would have a communal terrace above the top floor. There would be a vehicular access from Parkhouse Street between blocks C and D, leading to a yard area at the rear.

16. Blocks F, G, H and I – These four blocks would be located on the northern part of the site fronting Parkhouse Street and the central street. Blocks F and G would be separated from blocks H and I by a new street (The Mews) leading off Parkhouse Street, but communal amenity space for the blocks would be connected via a pedestrian footbridge at first floor level. Block F would be 9-storeys high (30m) with the top two floors set back and would comprise B1 class and A3 (café space) on the ground floor with 58 flats above. Block G would be 6-8 storeys high (max. 26.8m) with B1 class space on the ground floor and 38 flats above.
17. On the north-western side of the central street Block H would be 9-storeys high (30m) with B1 class, A1 (retail) and plant space on the ground floor including an energy centre, and 62 flats above. Block I would adjoin this and would be the tallest part of the development, incorporating a 12-storey tower (39.8m) at the point where the direction of the central street would change from westward to northward. It would comprise B1 class space on the ground floor including a microbrewery with ancillary tap room, and 75 flats above.
18. Blocks J, K and L - These adjoining blocks would sit parallel with the southern arm of the central street. Blocks J and K would be part 7, part 10 and part 11-storeys high (max 36.3m) with a terrace at 7th floor level between the two blocks. They would contain B class floorspace on the ground floor, with 64 flats above block J and 54 flats above block K. Block L which would sit at the junction of Wells Way and Parkhouse Street would be 6-storeys high (20.9m) and would contain B1 class and A1 / A3 (retail / café) space at ground floor level with 35 flats above; there would be a communal terrace on the roof of this block. Block J would contain 28 intermediate units, block K would contain 22 intermediate units and block L would contain 31 social rented units and 4 intermediate units.
19. Block M – This block would adjoin block L and would sit parallel with Wells Way. It would be 4-storeys high (14.1m) and would contain 23 social rented units including duplex units spanning ground and first floor levels. There would be a vehicular access between blocks L and M leading to a rear yard containing accessible parking spaces.
20. Materials for the proposed development would be predominantly brick, with elements of metal cladding and curtain wall glazing.
21. Phasing – The submission advises that the works would take approximately 3 years to complete and would be carried out in two broad phases. Phase 1 would comprise blocks A and B and phase 2 would comprise blocks C to M.

Amendments

22. A number of amendments have been made to the proposal during the course of the application, which has reduced the number of residential units on the site from 505 to 499, increased the B class floorspace on the site by 350sqm, increased the D2 floorspace by 11sqm and reduced the A class floorspace by 19sqm. The amendments to the proposed buildings are summarised below:

Block A – Reduced in height by one storey and pulled further away from 1-13 Parkhouse Street;

Block B – existing building retained, extended and converted in lieu of demolition and new build;

Block D – Increased in height by one storey on the north-eastern corner;

Block F – New balconies added.

Block G – Reduced in height by one storey and balconies amended;

Block I – Reduced in height by two storeys and amendments to the architectural detailing;

Block J – Increased in height by 2 storeys;

Block K – Increased in height by one storey;

Block M – Front gardens to this block reduced in size to increase the width of the pavement.

23. In addition, alterations to internal layouts, unit mix, window and balcony sizes and pavement widths to allow for tree planting were included in the amended submission.

Planning history

Entire site

24. 17/AP/1923 - Redevelopment of site comprising approximately 400 residential units and approximately 6,000 sqm (NIA) of commercial space within buildings up to 18 storeys in height. EIA scoping opinion issued
25. 16/EQ/0252 Application type: Pre-Application Enquiry (ENQ)
Re-development of the site to deliver 4,100sqm of commercial floor space and 409 residential units.
26. Pre-application advice was provided, details of which are held electronically by the Local Authority and is included as Appendix 3. Advice focussed on the principle of the proposed development in terms of land use including the provision of commercial space, the height and layout of the proposed development, impacts upon neighbouring properties and affordable housing.

Unit 1, Burgess Business Park

27. 17/AP/1920 - Notification of prior approval for proposed change of use of a building from use Class B1(a) to provide 11 residential units (C3). Prior approval refused for the following reasons:

1) The proposal fails to provide sufficient detail of cycle parking storage or information on the level of car parking contrary to criterion a - 'Transport and highways impacts of the development' of the Town and Country Planning (General Permitted Development) (England) Order 2015, Schedule 2, Part 3, Class O as amended.

2) The proposal fails to provide sufficient information regarding any flood risk arising from the change of use, and fails to provide adequate mitigation measures against the potential flood risk of the application site contrary to criterion c 'flooding risks on the site', of the Town and Country Planning (General

Permitted Development) (England) Order 2015, Schedule 2, Part 3, Class O as amended.

Unit 4, Burgess Business Park

28. 17/AP/1921 - Notification of prior approval for proposed change of use of a building from use Class B1(a) to provide 16 residential units (C3). Prior approval was required and refused in June 2017 for the following reasons:

1) The proposal fails to provide disabled parking and sufficient detail of cycle parking storage or information on the level of car parking contrary to saved policies 5.3 - Walking and Cycling, 5.6 – Parking and 5.7 – Parking for disable users of The Southwark Plan 2007, SP2 - Sustainable Transport of The Core Strategy 2011 and The National Planning Policy Framework 2012.

2) The proposal fails to provide sufficient information on the positioning and locations of bedrooms, kitchens, bathrooms and other residential uses, and fails to provide adequate mitigation measures against the potential flood risk of the application site contrary to saved policy 3.31 – Flood defences of the Southwark Plan 2007, section 5.12 – Flood Risk Management of the London Plan 2016, and section 10 – Meeting the challenge of climate change, flooding and coastal change of the National Planning Policy Framework 2012.

10-12 Parkhouse Street

29. 13/AP/4584 - Change of use from Class B1(a) office use to create 39 residential dwellings (C3 Use Class). Prior approval was required and was granted, but was not implemented.
30. 17/AP/0590 - Change of use from Class B1(a) office use to create 39 residential dwellings (C3 Use Class). Prior approval was required and was granted but has not been implemented.

Planning history of adjoining sites

21-23 Parkhouse Street

31. 17/AP/1723 - Demolition of existing building and erection of two blocks (Block A and Block B) of 5 and 9 storeys. Block A to comprise a 5-storey block for B1(c) commercial/employment use (1030sqm). Block B to comprise a 9-storey block with ground floor B1(c) commercial/employment use (89sqm) and 32 residential dwellings (8x1 bed, 16x2 bed, 8x3 bed). Together with associated accessible and car-club parking, landscaping, cycle parking and refuse store. Application WITHDRAWN (it is noted that this proposed development has been included in the cumulative impact assessment within the Environmental Statement).

66 Wells Way and 41 and 43 Parkhouse Street

32. 17/AP/4381 - Demolition of existing building located at 41-43 Parkhouse Street, and the construction of an extension to the existing building located at 66 Wells Way to be used for B2/B8 and Sui Generis (Waste Transfer) Uses in connection with the existing use of the retained building. Together with alterations to the existing vehicular access on Parkhouse Street, and the provision of associated car and cycle parking facilities. Planning permission was GRANTED in February 2018.

49-65 Southampton Way

33. Demolition of existing warehouse (Use Class B8) and office buildings (Use Class B1A) and the erection of a part 2, part 4-storey building plus basement comprising self storage facility (Use Class B8) and flexible office space (Use Class B1A) together with vehicular and pedestrian accesses, parking, associated works and landscaping. Planning permission was GRANTED in April 2018. Pre-commencement conditions for this permission are currently being discharged.

KEY ISSUES FOR CONSIDERATION**Summary of main issues**

34. The main issues to be considered in respect of this application are:
- Principle of the proposed development in terms of land use, including departure from policies to protect preferred industrial locations
 - Equality implications
 - Environmental impact assessment
 - Design, including building heights and impacts of tall buildings on local views
 - Impact on heritage assets
 - Density
 - Affordable housing
 - Mix of dwellings
 - Wheelchair accessible housing
 - Quality of accommodation
 - Trees and landscaping
 - Impact of proposed development on amenity of adjoining occupiers and surrounding area
 - Noise and vibration
 - Transport
 - Air quality
 - Ground conditions and contamination
 - Flood risk
 - Sustainable development implications
 - Archaeology
 - Wind microclimate
 - Ecology
 - Socio-economic impacts and health
 - Planning obligations (S.106 undertaking or agreement)
 - Mayoral and Borough community infrastructure levy (CIL)
 - Statement of community involvement
 - Other matters

Planning policy

Policy Designations (Proposals Map)

35. - Urban Density Zone
 - Air Quality Management Area
 - Parkhouse Preferred Industrial Location (PIL) - local
 - Possible Public Transport Depot (no longer required)
 - Area where 35% affordable and 35% private housing is required.

National Planning Policy Framework 2018 (the Framework)

36. Section 2 – Achieving sustainable development
 Section 5 – Delivering a sufficient supply of homes
 Section 6 – Building a strong and competitive economy
 Section 8 – Promoting healthy and safe communities
 Section 9 – Promoting sustainable transport
 Section 11 – Making efficient 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 Practice Guidance

The London Plan 2016

37. Policy 3.1 - Ensuring Equal Life Chances For All
 Policy 3.3 - Increasing housing supply
 Policy 3.5 - Quality and design of housing developments
 Policy 3.6 - Children and young people's play and informal recreation facilities
 Policy 3.8 - Housing choice
 Policy 3.9 - Mixed and balanced communities
 Policy 3.10 - Definition of affordable housing
 Policy 3.11 - Affordable housing targets
 Policy 3.12 - Negotiating affordable housing on individual private residential and mixed use schemes
 Policy 4.2 - Offices
 Policy 4.3 - Mixed use development and offices
 Policy 4.4 – Managing industrial land and premises
 Policy 4.7 - Retail and Town Centre Development
 Policy 4.8 - Supporting a Successful and Diverse Retail Sector
 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 5.8 - Innovative energy technologies
 Policy 5.9 - Overheating and Cooling
 Policy 5.10 - Urban Greening
 Policy 5.11 - Green roofs and development site environs

Policy 5.12 - Flood risk management
 Policy 5.13 - Sustainable drainage
 Policy 5.14 - Water Quality and Wastewater Infrastructure
 Policy 5.15 - Water Use and Supplies
 Policy 5.21 - Contaminated land
 Policy 6.9 - Cycling
 Policy 6.10 - Walking
 Policy 6.13 - Parking
 Policy 7.1 - Building London's Neighbourhoods and Communities
 Policy 7.2 - An inclusive environment
 Policy 7.3 - Designing out crime
 Policy 7.4 - Local character
 Policy 7.5 - Public Realm
 Policy 7.6 - Architecture
 Policy 7.7 - Location and design of tall and large buildings
 Policy 7.8 - Heritage assets and archaeology
 Policy 7.14 - Improving Air Quality
 Policy 7.15 – Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes
 Policy 7.19 - Biodiversity and Access to Nature
 Policy 7.21 - Trees and woodlands
 Policy 8.2 - Planning obligations
 Policy 8.3 - Community infrastructure levy

Core Strategy 2011

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

Southwark Plan 2007 (July) - saved policies

39. 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.

1.1 - Access to employment opportunities
 1.2 - Strategic and local preferred industrial locations
 1.5 - Small businesses
 2.2 - Provision of new community facilities

- 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
 - 3.16 - Conservation areas
 - 3.18 - Setting of listed buildings, conservation areas and world heritage sites
 - 3.19 - Archaeology
 - 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
40. Development Viability SPD (2016)
 Technical Update to the Residential Design Standards SPD (2015)
 Section 106 Planning Obligations/CIL SPD (2015)
 Affordable housing SPD (2008 - Adopted and 2011 - Draft)
 Residential Design Standards SPD (2011)
 Sustainable Transport SPD (2010)
 Sustainable design and construction SPD (2009)
 Sustainability assessments SPD (2009)
 Statement of Community Involvement (2008)
- Draft New Southwark Plan (NSP)
41. 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). As the New Southwark Plan is not yet an adopted plan, it has limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework. The following emerging policy is relevant to this application.
42. Proposal site designation NSP23 in the draft NSP which covers this entire local PIL, not just the application site. The draft policy advises that redevelopment of the site must:
- Re-provide at least the amount of employment floorspace (B class) currently on the

site or provide at least 50% of the development as employment floorspace;

- Provide new homes (C3);
- Enhance permeability including new north-south and east-west green links;
- Provide public realm improvements including a square.

43. Redevelopment of the site should:

- Provide industrial employment space (B2, B8);
- Provide active frontages (A1, A2, A3, A4, D1, D2) at appropriate ground floor locations.

44. Redevelopment of the site may:

- Provide extra care housing (C2).

45. The detailed guidance advises that by developing at a higher density the amount of small business space will represent at least 50% of the proposed floorspace, with opportunities to incorporate new housing. Negative impacts upon neighbouring properties should be avoided. The draft policy notes that the Council is changing its approach to industrial land in certain locations to accommodate mixed neighbourhoods, new homes, jobs and community facilities, and notes the importance of providing a variety of types of employment spaces.

46. The draft policy advises that comprehensive mixed-use redevelopment of the site could include taller buildings, subject to consideration of impacts on existing character, heritage and townscape. Development on the site should establish green links into Burgess Park and from Chiswell Street to Newent Close, and provide public access to new public realm in the site. Consideration should be given to focal points of activity and active frontages that encourage footfall, and should enhance existing and proposed pedestrian and cycle routes.

Draft New London Plan

47. 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.

Principle of proposed development in terms of land use, including departure from policies to protect preferred industrial locations

48. The proposed development would not re-provide the full amount of existing employment floorspace which would not comply with strategic policy 10 of the Core Strategy or draft site designation NSP23. It would also introduce residential and retail uses within a preferred industrial location which would be a departure from saved policy 1.2 of the Southwark Plan. Neighbouring residents have raised concerns including the loss of employment floorspace on the site, lack of demand for the retail space, and the need for affordable workspace.

49. Policy 4.4 of the London Plan relates to managing industrial land and premises and requires Local Authorities to identify and protect locally significant industrial sites where justified by evidence of demand. At a borough level the site is located in the Parkhouse Street preferred industrial location (PIL), which is a PIL of local importance

identified in the Core Strategy. Strategy policy 10 of the Core Strategy states that the PILs will be protected for industrial and warehousing uses. Saved Southwark Plan policy 1.2 states that the only developments that will be permitted in PILs are B class uses and other sui generis uses which are inappropriate in residential areas. The Core Strategy recognises that structural changes in the economy are resulting in a declining need for industrial land in London. Saved Policy 1.5 is also relevant which encourages the provision and requires the replacement of small business units.

50. The existing buildings on the site provide 12,559.3sqm (GIA) of commercial floorspace, although only 3,938sqm of it is occupied. This includes 1,598sqm of floorspace which is occupied by Arbeit, a workspace provider which provides creative workspace and studio space for artists. Arbeit took on the space on a temporary basis in December 2017 as a meanwhile use.
51. The applicant took over the management of the site 10 years ago and has advised that several of the units, including 10-12 Parkhouse Street which provides 2,104sqm of floorspace, have been vacant for over 10 years in spite of marketing to seek to fill the space. Current occupiers are Peach Tree Services Ltd, the applicant, which is a property management company (1,148sqm for office and storage space), Swiss Postal Solutions Ltd which provide electronic document management and business processes services (677sqm for office use) and a car wash (515.5sqm); there are 57 people employed at the site, most of whom (51) are employed by Swiss Postal Solutions. A further 1,598sqm of floorspace The submission includes information about Fruitful Office Ltd which had occupied 1,766.9sqm of space at the site, but they had outgrown their premises and relocated to a new site in Croydon in September.
52. The proposed development would provide 3,725 sqm of B class floorspace across the site. Therefore, there would be a significant loss of B class floorspace of 8,834.3sqm. This would be contrary to strategic policy 10 of the Core Strategy which seeks to protect employment floorspace in Preferred Industrial Locations. The proposal would also introduce A class, D class and residential floorspace into the PIL which would represent a departure from saved policy 1.2 of the Southwark Plan which only permits B class and sui generis uses in these locations.
53. In determining whether the principle of the proposed development would be acceptable in land use terms Members should consider whether the wider regeneration benefits of the scheme would outweigh any harm caused, and whether those benefits would justify a departure from the adopted planning policy. Officers consider that the key benefits arising from the proposal would be as follows:

Regeneration of an aging industrial estate

54. A borough-wide Southwark Employment Land Study dated January 2016 was carried out by CAG Consultants on behalf of the Council, to form part of the evidence base for the NSP. It describes the quality of the commercial accommodation at Burgess Business Park as fair, but notes that some is clearly aged and deteriorating. It advises that the site provides valuable B-class space, albeit within a dense residential area and on a site that could be considered 'off-pitch' from a market perspective, and that whilst the site might be considered for protection because demand might remain strong, attracting new investment to update the premises might prove problematic due to the residential character of the wider area. The report recommends that consideration be given to supporting mixed-use development on the site, or possible release for residential use.

55. The planning application advises that the existing employment space on the site is of poor quality; both parts of the site currently only have one access point each and contain large areas of parking, the buildings are of poor quality construction with inefficient layouts and design, and they have limited environmental credentials. The submission advises that these issues render them unsuitable to meet modern requirements, and that their poor state of repair would require a significant amount of investment to bring them up to modern standards.
56. The proposed development would provide modern employment space which has been designed to incorporate a range of different B1 uses comprising large and small 'maker' spaces (2,023sqm), co-working and creative office space (1,362sqm), a microbrewery with ancillary tap room (264sqm) and a lettings office (76sqm). The commercial space has been designed to be flexible so that units could move between the different types of B1 spaces if required. The units could also be subdivided or enlarged to meet end user requirements.
57. The maker spaces would range from 23-400sqm in size, and the units within blocks C, D and E would have access to yards at the rear of the block. Following discussions with Arbeit the scheme was amended to cluster the small maker spaces around the proposed mews street off Parkhouse Street, to make the units smaller, to include glazed and shuttered shopfronts to the units and stores at the rear, and to incorporate an ancillary gallery and office space to support the future occupiers. It is anticipated that they would be occupied by small companies and individuals requiring space for activities such as small scale manufacturing, bespoke artisanal production, research, product development and prototyping. The design of the commercial units has been informed by other employment spaces including Pullen's Yard in Walworth which provides artist and employment space, and following discussions with potential occupiers and Arbeit. The units would be well-lit, would have floor-to-ceiling heights of ranging from 3.2m-4,5m, and the larger units would be dual aspect.

Job creation

58. Based on current employment densities the site would have supported around 636 jobs if fully occupied. The buildings have not been fully occupied for at least 10 years however, and excluding the meanwhile use, currently only employs 57 people. This would increase to 255 jobs within the completed development which is a significant positive aspect of the proposal, and some 435 jobs would be created during the construction period.
59. In recognition of the loss of B class floorspace a contribution of £84,349 would be provided through the s106 agreement, to contribute towards skills and employment programmes in the borough. This has been calculated in accordance with the Council's adopted Planning Obligations and CIL SPD.

The potential to attract a specialist workspace provider to manage new and refurbished space

60. In formulating the commercial component of the scheme the applicant has worked with CF Commercial, has met with potential occupiers of the space, and has reviewed workspace developments across London including Pullen's Yard and the Galleria in Peckham.

61. The applicant has approached a number of workspace providers from the Council's Workspace Provider List and other Southwark-based organisations, and has held meetings with Arbeit (now in temporary occupation at part of the site), ASC Studios and The Art Academy. These organisations all specialise in providing affordable workspace and could manage affordable workspace within the development (details below). It is recommended that a clause be included in the s106 agreement ensuring the delivery of the commercial space before a proportion of the residential space can be occupied, and requiring the appointment of a specialist workspace provider.
62. An outline estate management strategy has been included in the submission which would be developed further and secured through the s106 agreement. Key principles include a dedicated site manager who would be responsible for the day-to-day management of the development and overseeing servicing of the proposed commercial space.

Provision of affordable workspace

63. Emerging policy P28 in the draft NSP 'Small and independent businesses' requires developments to retain small and independent businesses, and where they are at risk of displacement, to consider the feasibility of providing affordable and suitable space for existing occupiers within the proposed development. It also requires developments to incorporate well designed and flexible units suitable for small and independent businesses including a range of unit sizes and types.
64. The proposal would include 19 small units clustered around the mews street which would be suitable for small and independent businesses. It is proposed that 10% of the commercial space (372.5sqm) would be offered to small and independent businesses and the basic terms would be as follows:
- Occupier rents of £16 per square foot per year compared to £22.50 per square foot for market value. This therefore equates to 71% of market rent.
 - Fit out would comprise electricity, WCs and shared facilities including kitchen;
 - Flexible Leases from 12 months up to 5 years;
 - The units would only be available for a business which has a single premises;
 - During an initial marketing period of 6 months the affordable workspace provider would endeavour to let the space to occupants who have an existing business in Southwark or are a resident of Southwark;
 - During the construction period a database of interested parties would be compiled and maintained;
 - On completion the units would be marketed using a website, social media and external signage;
 - Units would be actively marketed for 6 months to Southwark businesses / residents. Only if the units remain unoccupied after this period of marketing would 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;
 - Day-to-day management of the units would be carried out by a suitably qualified affordable workspace provider;
 - The units would remain as affordable units for a period of 15 years.
65. Emerging policy P38 of the draft NSP 'Business Relocation' requires that where existing small or independent businesses or small shops are displaced by a

development, a business relocation strategy, in written consultation with affected businesses, must be provided. This must include details of existing levels of non-residential floorspace, a schedule of the affected businesses including use, employees and lease terms, proposed levels of non-residential floorspace, details of engagement with the affected businesses and details of engagement with workspace providers to secure occupiers for new employment space.

66. The applicant has submitted a Draft Business Relocation Strategy which provides details relating to Swiss Postal and the Continental Car Wash. It also provides details of Fruitful Office but as stated, this business has recently relocated. Arbeit has not been included on the basis that it is a temporary use, neither has the space on the site which is occupied by the applicant as this would be reprovided in one of Peachtree's other sites.
67. Swiss Postal Solutions is an international business with offices in Europe, the USA, Australia and Asia and which currently employs 51 people at the site; they have a lease until September 2021. The applicant has not yet commenced discussions with this business, but the draft strategy advises that it could be accommodated in the office space within the proposed development. However, as the site would be predominantly cleared the business would have to find temporary accommodation during demolition and construction works. The strategy advises that if permission is granted, the applicant would initiate discussions with this business 6-12 months prior to practical completion with regard to them returning to the site should they wish, and this could be secured in the s106 agreement. Officers note that as this is an international business it is more likely to have the resources in place to support it through any relocation than a small, independent business.
68. Continental Car Wash and valeting service operates from a building on Parkhouse Street. It currently employs 5 people and has a yearly lease which will come to an end on 22nd February next year, with a landlord 2-week break clause. The draft strategy advises that this business requires parking for cars waiting to be washed which cannot be accommodated within the proposed development. It also advises that noise and traffic generated by this business from running vehicle engines and car washing operations may cause disturbance to residential occupiers. As such there have not been any discussions with this business to date. The Council's Environmental Protection Team has confirmed that a number of complaints have been made by neighbouring residents regarding noise from the car wash, but that the impacts were not sufficient to warrant formal action.
69. The car wash is a small, independent business but officers recognise the potential constraints in it being reprovided within the proposed development. It is therefore recommended that the s106 agreement requires the developer to assist this business in finding an alternative premises should they wish to relocate.

Creation of a vibrant, mixed-use development

70. In addition to the B class floorspace the proposal would provide A and D class uses which are currently anticipated as being a bicycle shop, a café and a gym, plus a significant quantum of residential units. The A and D class uses would offer additional services to the wider neighbourhood which is considered to be a positive aspect of the proposal. Although not within a town centre, the scale of retail proposed would be relatively minor and would serve a localised catchment. The development would include new areas of public realm with external seating which would be available for

the whole community, and which could be used for events such as farmers' markets and arts and craft fairs managed by the dedicated site management. It is recommended that a clause be included in the s106 agreement securing public access through the site.

Provision of housing including affordable housing

71. There is a pressing need for housing across London, and the emerging policy for this site within the draft NSP requires redevelopment of the site to provide new homes. The proposal would deliver 499 new residential units including 35% affordable housing, which is considered to be a significant positive aspect of the proposal; this is considered further in the affordable housing section of this report.

Land use assessment against draft proposal site designation NSP23

72. As stated, draft site designation NSP23 requires redevelopment of the site to replace the existing B class floorspace or provide 50% of the development as employment floorspace, and to provide new homes. It advises that redevelopment should provide industrial employment space within use classes B2 and B8, and active frontages falling within use classes A1-A4, D1 and D2.
73. The proposal would provide new homes and new A1-A4 and D2 uses, but would deliver significantly less B class floorspace than currently exists on the site. It would also not deliver any B2 or B8 floorspace, as these may not be compatible with the new residential uses and the surrounding residential properties, and B8 uses are like to attract more and larger vehicles which would be difficult to accommodate on this site.
74. The loss of B class floorspace which would arise from the proposal has been raised as a concern by the GLA in their stage 1 response. A larger amount of B class floorspace on the site would reduce the number of new homes which could be accommodated here, and this in turn impacts on viability, and the ability of the development to provide affordable housing. The Council's viability advisor for this application, GVA, has therefore tested the impact that delivering various quantum of B class floorspace on the site would have on the amount of affordable housing which could be provided, and the four options which have been tested are set out below.
75. Option 1 – This is the current proposal which includes 3,725sqm of B class floorspace, equating to approximately 30% re-provision. GVA has advised that this proposal can viably support 19.4% affordable housing. The applicant has nonetheless offered 35% affordable housing which would be secured through the s106 agreement, equating to 173 affordable units.
76. Option 2 – This option would deliver 453 residential units and 6,279.65sqm of B class floorspace, equating to 50% re-provision. This could support 17.5% affordable housing, equating to 134 affordable units.
77. Option 3 – This option would deliver 425 residential units and 7,912.3sqm of B class floorspace, equating to 63% re-provision. This could support 16.84% affordable housing, equating to 129 affordable units.
78. Option 4 – This option would deliver 390 residential units and 12,308sqm of B class floorspace equating to 98% re-provision. This could support 14.41% affordable housing, equating to 108 affordable units.

79. The above demonstrates that increasing the amount of B class floorspace on the site would have a significant impact upon the amount of affordable housing which could be delivered. The applicant has also advised that they would not propose to go forward with a scheme which had a significantly larger quantity of employment space on the site because they do not consider that it would be deliverable in this location, and have concerns as to whether there would be demand for significant additional employment space here. The current proposal would deliver the most affordable housing, and the loss of B class floorspace needs to be weighed in the balance with the other benefits arising from the proposal including housing delivery and an increase in jobs at the site.
80. Conclusion to land uses - The proposed development would result in a significant loss of B class floorspace which would be contrary to strategic policy 10 of the Core Strategy. It would also introduce residential, A and D class uses into a PIL which represents a departure from saved policy 1.2 of the Southwark Plan. This must therefore be weighed against the benefits of the scheme including regenerating an aging industrial estate, job creation, the provision of good quality, flexible commercial space including affordable commercial space, and a sizeable contribution to the stock of housing in the borough including 35% affordable housing. The site sits within a relatively isolated industrial area, remote from the main trunk road network and with low access to public transport. In these circumstances it is considered reasonable to give greater weight to the provision of new housing, and the valuation conclusions confirm that higher amounts of B class floorspace would have a significant impact upon both the total number of residential units which could be provided, and the proportion of those which could be made affordable. Officers therefore consider that in land use terms the benefits would outweigh the loss of B class floorspace in this instance, and that the proposal would not prejudice the objectives of the emerging site designation in the draft NSP. The NSP does not propose to maintain the PIL designation, and allows for the introduction of non-B class uses at the site.

Equality implications

81. The site contains one business owned by a person from an ethnic minority, who would be given assistance by the developer in finding a new premises if required. The proposed development would increase jobs at the site and would provide new homes, potentially benefitting a broad range of people.

Legal context

82. The Equality Act 2010 provides protection from discrimination in respect of certain protected characteristics namely: age, disability, gender reassignment, pregnancy and maternity, race, religion, or beliefs and sex and sexual orientation. Section 149 of the Equality Act 2010 places the Local Planning Authority under a legal duty to have due regard to the advancement of equality in the exercise of its powers including planning powers. Officers have taken this into account in the assessment of the application and Members must be mindful of this duty when determining all planning applications. In particular Members must pay due regard to the need to:
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act;
 - Advance equality of opportunity between persons who share a relevant

protected characteristic and persons who do not share it;

- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

83. This section of the report examines the impact of the proposal on those with protected characteristics and with a particular focus on the Council's legal duties under s.149 of the Equality Act 2010. The main issue is the displacement of existing businesses. The proposed development would require the demolition of most of the existing buildings on the site, and the new buildings would be delivered in two phases.

Available material

84. The applicant has submitted an Equalities Statement in support of the application which was updated in August. The proposal would displace existing businesses Swiss Postal and the Continental Car Wash. It would also displace space used by the applicant, but this would relocate to one of Peachtree's other sites. No equalities survey of the Swiss Postal employees has been undertaken, although it is noted that it is an international business and as such is likely to have the resources needed to help it through a relocation process. This business could, in any event, be accommodated within the proposed development and the s106 would require the developer to facilitate this should the business wish to stay. Continental Car Wash is a small, independent business currently employing five people.

Negative equality impacts

85. The only negative impact which has been identified is in relation to race, on account of the loss of the car wash. The Equalities Statement advises that the business owner is from an ethnic minority and the employees are Eastern European. There are no proposals to accommodate this business within the development therefore it would have to relocate. The business owner could potentially experience difficulties in finding alternative premises.
86. The Equalities Statement does not suggest any specific mitigation to deal with this, but the applicant has agreed to support the business owner in finding new premises should they wish, and this would be secured through the s106 agreement.

Positive and Neutral equality impacts

87. The Equalities Statement advises that the proposal would have positive, neutral and no equality effects in relation to age, disability, gender and gender reassignment, marriage and civil partnership, pregnancy and maternity, race and sexual orientation, and these are summarised in the table below:

Characteristic	Potential effects	Reason and nature of effect
Age	Neutral and positive	<u>Neutral</u> impacts during the construction process. Construction management processes and complaints procedures in place which would have regard to people sharing protected characteristics, including people with disabilities and the elderly. <u>Positive</u> impacts arising from the increase in jobs which would benefit people of all ages,

		good quality housing including affordable and family housing, an inclusive built environment including level pathways, seating, dropped kerbs and accessible parking.
Disability	Neutral and positive	<u>Neutral</u> impacts during construction owing to construction management and health and safety processes. <u>Positive</u> impacts through job creation which would increase opportunities, 10% wheelchair accessible housing and accessible public realm.
Gender and gender reassignment	Neutral, positive, and no effect	<u>Neutral</u> impacts during construction. Contractors would have to comply with equalities legislation. <u>Positive</u> impacts from the provision of commercial space and employment opportunities; employers would have to comply with equalities legislation. <u>No effects</u> identified in relation to the new residential accommodation and public realm.
Marriage and civil partnership	Neutral, positive, and no effect	<u>Neutral</u> impacts during construction. Contractors would have to comply with equalities legislation. <u>Positive</u> impacts from the provision of commercial space and employment opportunities; employers would have to comply with equalities legislation. <u>No effects</u> identified in relation to the new residential accommodation and public realm.
Pregnancy and maternity	Neutral and positive	<u>Neutral</u> impacts during construction. Contractors would have to comply with equalities legislation. <u>Positive</u> impacts from the provision of commercial space and employment opportunities; employers would have to comply with equalities legislation. Good quality housing and accessible public realm would be provided, together with playspace for younger children.
Race	Neutral, negative, no effects	<u>Negative</u> – Loss of the existing car wash as the business owner is from an ethnic minority and the employees are Eastern European. Noted that overall jobs at the site would increase. <u>Neutral</u> - impacts during construction. Contractors would have to comply with equalities legislation. <u>No effects</u> in relation to the residential accommodation or public realm / site accessibility.
Religion or belief	Neutral, positive, no effects	<u>Neutral</u> impacts during construction. Contractors would have to comply with equalities legislation. <u>Positive</u> impacts from the provision of commercial space and employment

		opportunities; employers would have to comply with equalities legislation. <u>No effects</u> in relation to the residential accommodation or public realm / site accessibility.
Sexual orientation	Neutral, positive, no effects	<u>Neutral</u> impacts during construction. Contractors would have to comply with equalities legislation. <u>Positive</u> impacts from the provision of commercial space and employment opportunities; employers would have to comply with equalities legislation. <u>No effects</u> in relation to the residential accommodation or public realm / site accessibility.

88. Conclusion to equality implications – The equality impacts of the proposal would generally be positive, although it does have the potential to result in an adverse equality effect in relation to race owing to the loss of the existing car wash. The s106 agreement would require the developer to assist this business in finding alternative premises, although this may or may not be successful. Members must therefore keep this firmly in mind in the decision-making process, and weigh this negative equality impact in the balance with all of the other benefits and disbenefits of the proposal. Given the range of positive equality impacts which would arise including from an increase in jobs at the site, officers consider that the benefits would outweigh the harm in this instance.

Environmental impact assessment

89. The application is accompanied by an Environmental Statement (ES), following the advice in the Council's Scoping Opinion.
90. Applications where an Environmental Impact Assessment (EIA) is required will either be mandatory or discretionary depending on whether they constitute Schedule 1 (mandatory) or Schedule 2 (discretionary) development in the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended). In this case the proposed development falls under Schedule 2, Category 10b 'urban development project' of the EIA Regulations where the threshold for these projects is development including one hectare or more of urban development which is not dwellinghouse development, development including more than 150 dwellings, and development where the overall area of the development exceeds 5 hectares. The development would provide more than 1 hectare of development which is not dwellinghouse development, and would provide more than 150 dwellings. Notwithstanding this, an EIA is only required if it is likely to generate significant environmental effects having regard to the criteria set out in Schedule 3 of the Regulations, which include:
- the characteristics of the development;
 - the environmental sensitivity of the location; and
 - the characteristics of the potential impact.
91. It is considered that the proposed development would generate significant

environmental effects based upon a review of Schedule 3, and therefore an EIA is required.

92. 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 17/AP/1923).
93. Regulation 3 of the EIA Regulations precludes the granting of planning permission unless the council has first taken the 'environmental information' into consideration. The 'environmental information' means the ES including any further information, together with any representations made by consultation bodies and any other person about the environmental effects of the development.
94. The ES must assess the likely environmental impacts at each stage of the development programme, and consider impacts arising from the demolition and construction phases as well as the impacts arising from the completed and operational development.
95. It is not necessarily the case that planning permission should be refused if a development has the potential to have significant adverse impacts; it has to be decided whether any of the identified adverse impacts are capable of being mitigated, or at least reduced to a level where the impact would not be so significant or adverse as to warrant a refusal of planning permission.
96. It is noted that the EIA regulations were amended in 2017. However, the amendments came into force on 16th May 2017 and for planning applications accompanied by an ES or scoping opinions which were submitted before this date, the 2011 Regulations continue to apply. The scoping opinion relating to this application was submitted on 15th May 2017 therefore the 2011 Regulations apply.
97. The submitted ES comprises the Main Text, Technical Appendices, Built Heritage, Townscape and Visual Impact Assessment, 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 and Health
 Traffic and Transport
 Air Quality
 Noise and Vibration
 Daylight, Sunlight and Overshadowing
 Wind microclimate and
 Built Heritage, Townscape and Visual.

98. In assessing the likely environmental effects of a scheme, the ES must identify 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 in the ES in order to assess their significance and acceptability.

99. The impacts of the proposed development are expressed as follows:

100. Nature of an effect:

- Adverse - Detrimental or negative effects to an environmental / socio-economic resource or receptor. The quality of the environment is diminished or harmed.
- Beneficial - Advantageous or positive effect to an environmental / socio-economic resource or receptor. The quality of the environment is enhanced.
- Neutral - Where the quality of the environment is preserved or sustained or where there is an equal balance of benefit and harm.

101. Scale of an effect:

- Major – These effects may represent key factors in the decision-making process. Potentially associated with sites and features of national importance or could be important considerations at a regional or district scale. Major effects may also relate to resources or features which are unique to a receptor and which, if lost, cannot be replaced or relocated.
- Moderate - These effects, if adverse, are likely to be important at a local scale and on their own could have a material influence on decision-making.
- Minor - These effects may be raised as local issues and may be of relevance in the detailed design of the project, but are unlikely to be critical in the decision-making process.
- Negligible - Effects which are beneath levels of perception, within normal bounds of variation or within the margin of forecasting error, these effects are unlikely to influence decision-making, irrespective of other effects.

102. Whether an effect is significant or not:

- 'Moderate' or 'major' effects are deemed to be 'significant'.
- 'Minor' effects are 'not significant', although they may be a matter of local concern; and
- 'Negligible' effects are 'not significant' and not a matter of local concern.

Geographic extent of effect

103. At a spatial level, 'site' or 'local' effects are those affecting the application site and neighbouring receptors, while effects upon receptors in the borough beyond the vicinity of the application site and its neighbours are at a 'district / borough' level. Effects affecting Greater London are at a 'regional' level.

104. 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 have been re-consulted in writing, site notices have been displayed and an advertisement has been displayed in the local press. 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

105. Schedule 4 of the EIA Regulations sets out the information that is required for an ES, which includes an outline of the main alternatives considered. The ES considers three alternative options which are the 'Do Nothing' scenario, alternative sites, and 'Alternative Designs'.

The 'Do Nothing' scenario

106. This scenario would involve leaving the site in its current condition. This option has not been considered by the applicant on the basis that the site represents an opportunity to redevelop a brownfield area in the heart of London, providing residential accommodation, different types of employment space, and independent retail uses. The ES advises that this would lead to employment opportunities and other direct and indirect socio-economic benefits which would not otherwise be realised if the site were left as it is.
107. Although in draft form at present, officers note that the site is designated as a proposal site in the draft NSP which supports a move away from a solely industrial site to a mixed use development including employment space and new homes. Officers consider that the 'Do Nothing' scenario could result in a number of missed opportunities including to increase the number of jobs at the site, the delivery of a significant quantum of new housing on the site including affordable housing, and the provision of new public realm.

Alternative sites

108. The ES advises that no alternative sites have been considered for the proposed development, and that the site is an area of brownfield land in need of regeneration. It advises that the site is in an area which is undergoing regeneration and so it is appropriate to consider it as a viable redevelopment opportunity. Officers again note that the draft NSP designates the site as a proposal site suitable for comprehensive redevelopment.

Alternative Designs

109. The ES describes the design evolution of the proposed development. This included amendments to the position of the various buildings on the site including the proposed tower, changes to improve the quality of the public realm, changes to the servicing arrangements for the site and changes to the building heights. Officers note that a number of further changes have been made during the course of the application.

Cumulative effects

110. Two types of cumulative effects have been considered within the ES. The first is effects arising from the proposed development combined with effects from other developments in the surrounding area (i.e. cumulative schemes). The second is how the various effects of the proposal could interact to jointly affect receptors at and around the site (effect interactions).
111. The ES concludes that if the proposal is built at the same time as another consented development on Parkhouse Street there would be cumulative noise and vibration effects during demolition and construction which would be temporary, local, adverse

and moderate adverse (significant).

112. With regard to daylight and sunlight, whilst a number of properties would experience daylight and sunlight impacts as a result of the completed development, only two would experience VSC impacts in the cumulative scenario. 13 Parkhouse Street would experience daylight effects that would range from negligible to major adverse. In the cumulative scenario one further window would not comply with the Building Research Establishment (BRE) guidance, with a second floor window having a vertical sky component of 26.88% where the guidance recommends 27%. This would equate to a low magnitude of cumulative impact and a minor adverse cumulative effect on this window. In addition 83 Wells Way would experience a cumulative daylight (VSC) effect to a ground floor window, 23.97% VSC). This would equate to a low magnitude cumulative impact and a minor adverse cumulative effect on this window. There would be no further shortfalls for any properties in the cumulative scenario for No Sky Line (NSL) (daylight) and Annual Probable Sunlight Hours (APSH) test.
113. With regard to effect interactions during demolition and construction, there would be an adverse noise and air quality effect interaction which would be significant for properties on Southampton Way, Parkhouse Street and new residential units on the site, and which would be insignificant for properties on Wells Way and Cottage Green. Officers note that construction would be a temporary process. Within the completed development, effect interactions at locations along Southampton Way, Parkhouse Street and Wells Way as a result of daylight / sunlight and air quality would range from minor to major adverse. Air quality effects would not have any material implication on residential amenity, and so the over riding consideration is in relation to daylight and sunlight and this is considered in detail in the amenity section of this report.
114. The overall conclusion of the ES is that during demolition and construction the likely significant adverse effects would relate to noise which would be moderate adverse and temporary in duration. For the completed development there would be significant adverse effects relating to daylight and sunlight. The completed development would have significant beneficial effects in relation to the provision of new homes, increased local spending, wind microclimate, townscape settings and visual effects.

Design, including building heights and impacts of tall buildings on local views

115. The proposal is for a comprehensive redevelopment of the site, with new buildings ranging from 2-12 storeys in height. These would be arranged around a new central street which would run north-south and east-west across the site together with a mews street, focussed around the retained brick chimney. The development is generally arranged with employment space on the ground floors and residential above, except for block A which would be entirely residential.
116. Section 12 of the NPPF 'Achieving well-designed places' advises that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development which creates better places in which to live and work. Policy 7.4 of the London Plan requires development to have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area. Policies 7.4 and 7.5 are also relevant which require

developments to provide high quality public realm and architecture, and policy which 7.7 relates to the location and design of tall and large buildings.

117. 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. When we consider the quality of a design we look broadly at the fabric, geometry and function of the proposal as they are bound together in the overall concept for the design. 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. Saved policy 3.18 of the Southwark Plan requires to the setting of conservation areas, listed buildings and world heritage sites to be preserved.
118. Objections have been received relating to the height of the proposed development including lack of justification for tall buildings on the site, impact upon the local character, and impact upon surrounding conservation areas and listed buildings.
119. The proposal involves the development of an existing light industrial site bordered to the north by Burgess Park. The site and the surrounding industrial sites are predominantly characterised by mid 20th Century metal and brick clad industrial warehouses and areas of car parking accessed from Parkhouse Street, which is one-way from east to west. On the application site there are 3-storey brick former office buildings which appear to date from the 1980s.
120. The surrounding streets are predominantly residential in character and include the Elmgton area leading up to Camberwell Road around 300m to the west of the site. The nearest commercial frontage is on Southampton Way which is the main road leading from Camberwell Road to Peckham Road.

Urban Design and arrangement

121. The proposal seeks to transform the site into a new mixed-use quarter by introducing a new L-shaped route across the centre of the site. A small square of around 220sqm is proposed where the two parts of the L-shaped route would meet. This route has been inspired by the retained chimney stack which becomes an ordering device around which the entire development has been arranged. To the north of Parkhouse Street and approaching Burgess Park the route would reduce in scale and would provide gated access to proposed blocks A and B. A condition is recommended requiring the gates to be removed in the event that a new entrance to Burgess Park is required at this location in the future. The proposed layout would also allow for a new route through the site onto Southampton Way should this be required in the future, between proposed blocks E and J.



Entrance to central street

122. The development would be made up of a number of separate parts, all of which would work together to define this new mixed-use quarter and give the area a sense of place. These include:
- The Parkhouse Street block at the centre;
 - The Wells Way edge and route to the south;
 - The Parkhouse street edge and route to the west; and
 - The mews houses and Burgess Park edge to the north.
123. Each part would be further broken up into separate buildings to reflect the urban pattern of the area. For example, on Wells Way and the western end of Parkhouse Street the proposal is for a repeating pattern of low blocks to emulate the terraced properties nearby. At the centre of the site the buildings are proposed to become larger and take the form of modern warehouse-type buildings. In this way the urban design has responded to its urban setting, reflecting its industrial heritage in a modern way.
124. Overall, the proposed routes through the site and layout of buildings around them are considered to be logical and well structured. The new routes would be well integrated with both Parkhouse Street and Wells Way, with the potential to connect to Burgess Park and Southampton Way in the future. The potential route to Southampton Way would be just south of Chiswell Street on the opposite side of Southampton Way, which the NSP supports a connection with.

Height, Scale and Massing

125. The buildings on the streets surrounding the site are generally low-rise. There are 2-storey residential and commercial buildings on Parkhouse Street, 2-storey residential buildings on Wells Way opposite the site, and commercial and residential buildings ranging from 2-5 storeys high on Southampton Way. The buildings within the proposed development would range from 2 to 12-storeys, and would therefore appear markedly taller than their surroundings.
126. In policy terms, tall buildings are defined as those which are over 30m in height. There would be two tall buildings at the centre of the site, blocks I and J which would be 12 and 11 storeys high respectively. Blocks F and H would also technically be tall buildings because with the lift overruns included they would exceed 30m; the main bulk of these buildings would be 30m however. Saved policy 3.20 of the Southwark Plan requires all tall buildings among other things: to be located at a point of landmark significance, to be of exceptional quality of design, to make a positive contribution to the landscape, to relate well to their surroundings, and to contribute positively to the London skyline.
127. The approach to the height and massing of the proposed development has been influenced by a number of key principles arising from the urban setting, primarily the proximity of Burgess Park to the north, and the need to conserve or enhance nearby heritage assets (this is considered separately below). As a result height has been introduced carefully, starting low at the edge of the park with 2-storey mews houses, rising at the centre of the site.



Showing distribution of height across the site.

128. Given the proximity to the park and the sensitive relationship with the terrace of dwellings at 1-13 Parkhouse Street it is considered appropriate to limit the height of block A to 2-storeys. An extension to an existing building to form block B would result in a 5-storey structure, although the upper floors would be set back and the new 3-storey shoulder height would not represent a significant jump in scale in the streetscene relative to the adjacent terrace.
129. Building heights along Parkhouse Street would range from 3-9-storeys. The 3-storey building (block C) would be located opposite 1-13 Parkhouse Street and would not represent a significant increase in scale relative to the neighbouring buildings. The blocks would step up in height either side of the northern entrance to the new central street, marking and defining this new route which is considered to be appropriate. The blocks on the remainder of Parkhouse Street (blocks G and H) would be 6-8-storeys high, with the top two floors set back resulting in a six-storey shoulder height. This is a reduction in height from the 7-9 storeys shown on the plans as originally submitted, and given their setbacks from the site boundary and gaps between the buildings they are considered to be acceptable.
130. Building heights fronting Wells Way would range from 4-6 storeys. The taller building (block L) would mark the entrance to the new central street and is considered to be appropriate. Block M which would run parallel with Wells Way would step down to 4-storeys in height, emulating the reduction in height at the edge of the site which would take place next to Burgess Park.
131. The tallest buildings would be located towards the centre of the site which is considered to be appropriate. The tallest, block I, would be centred on the new public square, marking the point at which the central street would change direction. This is considered to be an appropriate location for a tall building as the square would become a point of landmark significance. The tall buildings at the centre of the site would comply with the Council's tall buildings policies; they would be located at the centre of the site and at the focus of the proposed new routes, would be elegant in design, and would contribute positively to the local skyline and the surrounding streets.



Showing tower and square.

Architectural Design

132. The Council's policies reflect the requirements of the NPPF and require buildings to be designed to respond to the area's defining characteristics. Good architectural design includes buildings finished in high quality materials that are built to last and reflect the local character, and they should be well composed with a clear sense of order and geometry.
133. The architectural design of the proposal is inspired by the warehouse aesthetic typical of Southwark's industrial heritage, as well as the mansion block typology which is prevalent in the area - a good example being the nearby Evelina Mansions. These buildings are characterised by their simply ordered brick-clad facades with deep-set multi-paned openings offset with metal-framed balconies. The main buildings within the proposed development are designed with robust, brick-framed bases and main body up to the 'shoulder' height, whilst the set-back upper storeys would be finished in a light-weight metal cladding which would be consistent with the character of the area and would give the development a high degree of interest and variety. Between the main blocks there would be smaller 'linking' blocks, with a more simple façade and typically stepping down and set-back from the building line. These linking blocks would give the streetscene a sense of continuity and enclosure and would help to break up the scale of the development into a series of identifiable building units.



Showing elevations

134. The tall buildings are designed as individual pieces focussed on the small public square at the centre of the site. The lower tower would rise to 11 storeys and would be consistent with its neighbouring buildings up to its 9-storey 'shoulder' height, with set-back metal-clad upper storeys. The primary tower would be the 12-storey building at the centre of the site which is designed with a clearly defined base, middle and top. The base would be a large, columned space which would include a double height commercial unit identified as a potential microbrewery with ancillary tap room facing directly onto the public square. It would have a strong geometric brick frame and a distinctive chamfered edge facing the square. At the top of the building the three uppermost floors would be expressed as a simple grid visible from the nearby streets, expressing the architectural qualities of what would be a distinctive tower seen in the round.
135. The architectural design is considered to be well thought out, high quality, and highly articulated. By introducing routes into and across the site and a new public space the proposal would transform this industrial site into a vibrant and attractive mixed-use quarter. The quality of architectural design would rely to a large degree on the quality of architectural detailing used in the construction of the development, especially for the tall buildings. Conditions requiring mock-ups of the cladding, material samples and a scheme for the restoration of the retained chimney stack would be required, and these have been included in the draft recommendation.

Comments of the Design Review Panel (DRP)

136. The scheme was reviewed by the Southwark DRP in July and October 2017 at pre-

application stage. The Panel were not able to endorse the height of the proposed development which at the time included a 14-storey tower at the centre of the site and a general height of around 9-storeys. As a result of the views of the panel the design was fundamentally revised, reducing the height of the tower, introducing a greater variety of building heights, especially at the edges along Parkhouse Street, and the provision of a new route from Parkhouse Street. Notwithstanding this, the scale of development has remained consistent at around residential 500 units.

137. In conclusion, the proposal is considered to be an elegant reinvention of this industrial site, successfully merging light-industrial and other commercial uses with new residential accommodation in a well structured urban pattern. The architectural design would be highly articulated and contextual, drawing on the heritage of the area.

Heritage assets

138. The site does not include any listed buildings and is not in a conservation area. However, there are a number of listed buildings nearby and the site has a direct relationship with Burgess Park to the north.
139. The nearest listed buildings include the grade II listed Collingwood House on Cottage Green, Nos 73,75 and 77 Southampton Way, and No 113 Wells Way. Slightly further away is the grade II listed former Church of St George, the spire of which is visible from a number of vantage points within Burgess Park – the impact upon the setting of these listed buildings are considered below. The nearest conservation area is the Addington Square Conservation Area to the west of the site. However, given the scale of the proposed development it would have no impact on its setting. At the centre of the site is a large chimney stack - a historic remnant of the industrial heritage of the site. It is considered that this is an undesignated heritage asset which would be preserved by the proposed development.
140. The Council's policies echo the requirements of the NPPF in respect of heritage assets and require all development to conserve or enhance the significance and the settings of all heritage assets and avoid causing harm. Where there is harm to a heritage asset the NPPF requires the Council to ascertain the scale and degree of the harm caused and to balance that against the public benefits arising as a consequence of the proposal.
141. An important influencing factor for the height and massing of the proposal has been the townscape view from the main east-west path in Burgess Park which focuses on the spire of the grade II listed former Church of St George which is a recognisable local landmark. Objections received following public consultation on the application raise concerns regarding the impact upon this heritage asset.
142. The massing proposed on the site has been carefully arranged to try to avoid causing a harmful impact on this designated heritage asset, retaining its primacy in the local views. This has meant that on Parkhouse Street the buildings would be limited to a 'shoulder' height of 6 and 7 storeys with set-back upper floors, whilst at the centre of the site the proposed buildings arranged around the 12-storey tower would rise to 8 and 9 storeys at the 'shoulder' with set-back upper storeys to the south.
143. In so far as the new buildings would appear over the mature tree-lined edge of the park relative to the spire of the listed former church, it is considered that some harm would arise to the setting of this important heritage asset. The harm is considered to

be at the lowest order of 'less than substantial' harm as defined by paragraph 193 of the NPPF. In such cases paragraph 196 of the NPPF requires the Local Planning Authority to consider the harm in the context of the significance of the heritage asset balanced against the public benefits arising from the development, and where the harm cannot be justified by the public benefits the proposal should be refused. In this case the harm is considered to be 'less than substantial', especially when considered proportionately i.e. affecting a heritage asset listed at grade II.

144. The townscape views submitted with the application demonstrate that the proposed buildings would not interact with the significant features of the spire, with the spire retaining its primacy in the park path view with the 12-storey tower receding away from the heritage asset as one approaches it from the east. In considering the limited harm caused by the new development, it is appropriate to consider whether this harm would be outweighed by the public benefits arising from the development including:

- The redevelopment of the site;
- the new publicly accessible areas - the new routes and public space;
- the undesignated heritage asset of the chimney which would be preserved; and
- the new housing including affordable housing to be provided by the development.

145. Taking all of the public benefits into account in the balance against the less than substantial harm to the setting of the former church, it is considered that the harm would be outweighed by the public benefits and the impact on the setting of the church would be justified.



Showing relationship with church spire.

146. Information submitted with the application demonstrates that the 11-storey tower (block J) would be visible in part over the rooftop of the Grade II Listed Collingwood House on Cottage Green when viewed obliquely from the corner with Southampton Way. This is an oblique view of the heritage asset and largely dominated by the light-industrial streetscene of Southampton Way. The view demonstrates that as the viewer moves along Cottage Green and closer to the front of the heritage asset where its architectural and historic significance as well as its setting can be appreciated, the new building would recede away and to the right. As the setting of Collingwood House would be preserved, it is considered the proposal would not cause harm to the heritage asset or its setting. As above, where it may be considered that there is harm

to a heritage asset it has to be balanced against the public benefits of the proposal. In the case of Collingwood House, it is considered that there would be no harm.

147. Proposed block J would appear in the background above the listed buildings at 73-77 (odds) Southampton Way. The proposed building would be set sufficiently far back from these properties to appear in the distant backdrop without causing any harm to their setting.
148. Concerns have been raised during public consultation on the application that the townscape assessment does not consider the impact upon the Victorian terrace at 1-13 Parkhouse Street. Whilst this is an attractive terrace, it is fairly typical of Victorian properties, and the height of the proposal relative to this terrace has been considered in the design section above and is considered to be acceptable.
149. In conclusion, whilst there would be some less than substantial harm to the setting of the listed former church, this is considered to be justified given the wider benefits of the proposal. Officers therefore consider that the proposal would comply with the relevant design policies and the NPPF.

Density

150. Based on the Southwark Plan methodology for mixed-use developments, the density of the proposed development would equate to 1,415 habitable rooms per hectare. Neighbouring residents have raised concerns that the proposal would exceed density ranges set out in planning policy and that this is not justified because the site is not in an opportunity area or an action area core, and that the revisions to the proposal have resulted in an increased density.
151. The site is within in the Urban Density Zone and has a public transport accessibility level (PTAL) of 2 (low). Table 3.2 of the London Plan would therefore support a density of 200-450 habitable rooms per hectare in this location.
152. With regard to Southwark policy, strategic policy 5 of the Core Strategy expects residential developments in the urban density zone to fall within the range of 200-700 habitable rooms per hectare. The Southwark Plan sets out the methodology for calculating the density of mixed use schemes, and requires areas of non-residential space to be divided by 27.5 to create an equivalent number of habitable rooms per hectare.
153. The Council's Residential Design Standards SPD requires accommodation to be of an exemplary standard where density ranges would be exceeded. The proposal would result in a good standard of accommodation, although not all aspects of the housing could be described as 'exemplary' – this is assessed further later in the report in the 'Quality of accommodation' section. It is considered that the proposal would be of an appropriate height and set within an acceptable amount of public realm, and the quantum of development would allow the provision of affordable housing to be maximised. Although there would be adverse impacts upon daylight and sunlight to neighbouring properties, this must be weighed in the balance with all of the benefits arising from the scheme. When all of the benefits and disbenefits are taken into account, it is not considered that exceeding the density threshold would warrant withholding permission in this instance.
154. It is noted that policy D6 of the draft London Plan requires development proposals to

make the most efficient use of land, to be developed at the optimum density. The draft policy places less emphasis on density thresholds, and more emphasis on good design.

Affordable housing

155. The proposed development would deliver a policy compliant level of affordable housing comprising 35% overall, with a tenure split of 70% social rented and 30% intermediate.
156. Section 5 of the NPPF sets out the government's approach to the delivery of significant new housing including a plan-led approach based on a sound evidence base, and policy 3.3 of the London Plan supports the provision of a range of housing types. It sets the borough a minimum target of 27,362 new homes between 2015-2025. Strategic policy 5 of the Core Strategy reinforces the London Plan policy, and 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. Core Strategy SP6 requires that developments with 10 or more units should provide a minimum of 35% affordable housing, subject to viability. Saved policy 4.4 of the Southwark Plan requires an affordable housing tenure split of 70% social rented and 30% intermediate units in this location.
157. The proposed development would deliver 35% affordable housing by habitable room, which would equate to 173 affordable units. With regard to tenure split, 70% of the units would be social rented and 30% would be intermediate. The mix of affordable units would comprise 63% 2+ bed units and 20% 3+ bed units. The affordable units would be located within blocks C, D, E and M.

Unit Type	Private (units)	Affordable Housing (units)		Total
		Social Rent	Intermediate	
Studio	23	0	0	23
1 bed	113	41	24	178
2 bed	121	44	30	195
3 bed	69	34	0	103
Total	326	119	54	499

158. For affordable housing purposes there would be 557 affordable habitable rooms within the development, comprising 389 social rented (70%) and 168 intermediate (30%).

Viability

159. The application is accompanied by a viability appraisal which has been independently reviewed by GVA on behalf of the Council. As set out above in relation to land uses,

the viability of various options have been assessed to test the impact that increasing the amount of commercial floorspace within the development would have on the quantum of affordable housing which could be delivered.

160. The proposed affordable housing offer would be policy compliant and would also exceed the level which the Financial Viability Appraisal submitted with the application suggests could be supported. The delivery of the affordable housing would be secured within a s106 agreement.

Mix of dwellings

161. The proposed development would be policy compliant in terms of its unit mix with no more than 5% studio units which would all be private, 60% 2+ bed units and 21% 3+ bed units.
162. Policy 3.8 of the London Plan 'Housing choice' requires new developments to offer a range of housing choices in terms of the mix, housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors in meeting these. Strategic policy 7 of the Core Strategy 'Family homes' requires developments of 10 or more units to provide at least 60% of the units with two or more bedrooms, at least 20% of the units with three or more bedrooms, and no more than 5% studio units which can only be for private housing. The proposal would deliver the following mix of units:
163. The proposal would deliver the following mix of units:

Mix	Units	%
Studio	23	4.6%
1-bed	178	35.7%
2-bed	195	39.1%
3-bed	103	20.6%
Total	499	100%

Wheelchair accessible housing

164. Policy 3.8 of the London Plan 'Housing choice' requires ninety percent of new housing to meet Building Regulation requirement M4 (2) 'accessible and adaptable dwellings', and ten per cent of new housing to meet Building Regulation requirement M4 (3) 'wheelchair user dwellings', i.e. Designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.
165. The proposal would deliver 90% of the units to M4 (2) standard and 10% to M4(3) which would comply with the London Plan, and a condition to secure this is recommended.

Quality of accommodation

166. Policy 3.5 of the London Plan requires housing developments to be of the highest quality internally, externally, and in relation to their context and to the wider environment. They should enhance the quality of local places, incorporate requirements for accessibility and adaptability, and minimum space standards. In

terms of Southwark policy, 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 units should be dual aspect to allow for good levels of light, outlook and cross-ventilation.

Suitability of the site for residential use

167. Chapter 8 of the ES 'Noise and vibration' considers whether noise levels at the site are such that it would be suitable for residential use. There are a number of industrial uses adjoining and close to the site and the proposal would introduce a significant number of new residential occupiers in close proximity to these industrial uses. It is noted that there are already residential uses around the site and numbers 45, 47 and 73 Southampton Way adjoin industrial premises.
168. The ES advises that short and long-term noise monitoring was undertaken at seven locations on and around the site. Concerns have been raised by a neighbouring resident that the noise monitoring locations do not take into account that the Babcock Depot at 25-33 Southampton Way operates 24/7. The depot is used for MOTs and vehicle repairs, and work is carried out on police cars and motorcycles from this depot. In response to this issue, the Council's Environmental Protection Team (EPT) understand that whilst vehicles may be dropped off at the site throughout the night and day, testing and repairs only takes place during the day and the Council has not received any noise complaints from existing residential occupiers in relation to this use. The applicant's acoustic consultant has advised that two noise monitoring locations on Parkhouse Street would have picked up noise from these premises in any event, including 24 hour use of the depot.
169. The ES advises that the proposed residential units facing the scaffolding yard would be most likely to be affected by high levels of noise when the yard is operational, followed by units fronting Wells Way and Parkhouse Street. The scaffold yard office is open 8am to 5pm Monday to Friday, and the yard itself is used from 7am until around 6pm during the week and sometimes opens on Saturday mornings until lunchtime / early afternoon. With regard to external amenity space, again the balconies and terraces closest to the scaffold yard would experience high levels of noise when the yard is in operation, and noise experienced at the other amenity spaces within the development would fall within acceptable limits.
170. The ES therefore recommends that mitigation be required. EPT has recommended a number of conditions to ensure that noise levels within the dwellings would fall within acceptable limits and these have been included in the draft recommendation. It is noted that the ES concludes that air quality within the completed development would be acceptable and would not adversely impact upon future occupiers.

Privacy

171. The Council's Residential Design Standards SPD recommends a minimum of 21m between the rear elevation of properties and 12m distance between properties that face one another, including across a highway.
172. No windows are shown in the eastern elevation of proposed block A, therefore there would be no direct overlooking between blocks A and B. There would be a minimum of 14m across the central street which would exceed the 12m minimum recommended in

the Residential Design Standards SPD where properties face each other.

173. There would be some instances of closer relationships however. There would only be 9m between some windows in blocks E and J, 6m between some windows in blocks F and G, 7m between some windows in blocks G and I, and some close relationships at the inward facing corners of blocks H and L. A condition is therefore recommended requiring obscure glazing or other privacy devices to prevent direct views between the affected units, and this should not significantly affect the quality or usability of the accommodation.

Aspect and outlook

174. The majority of the units (67%) would be dual or triple aspect. Of the single aspect units, none would be north-facing.
175. A number of the proposed buildings would be in close proximity to existing buildings which would impact upon outlook to the windows. These are set out below:

Block B

176. This existing building adjoins a 2-storey Council-owned building at 21-23 Parkhouse Street. Block B would be extended and converted, and at first floor level new balconies would be provided which would extend right up to the boundary with the adjoining building, with the balconies looking out onto the flank wall of number 21-23. At second and third floor levels new balconies would be a minimum of 1.5m back from the boundary, and windows would be provided on the boundary. So as not to compromise the development potential of this adjoining site it is recommended that a condition requires the windows obscure glazed and non-opening. A planning application was submitted to redevelop this adjoining site which showed new buildings pulled back from the site boundary to provide a new route alongside proposed block B, although it is noted that the application has recently been withdrawn.

Block C

177. This would have deck access to the rear which would be close to existing residential accommodation at the rear of 47 Southampton Way. The deck would need to incorporate lightweight screening to prevent loss of privacy and to provide outlook for the proposed units.

Blocks D and E

178. These blocks which would contain residential accommodation from first floor level upwards would include residential windows located 5m and 2m respectively off the boundary with 49-65 Southampton Way. This adjoining site is currently being redeveloped by Big Yellow to provide a new self-storage facility and office space.
179. With the Big Yellow development in place there would be a minimum of 8.5m between this new building and windows within block D, and a minimum of 5.2m for block E, both of which would be quite close relationships affecting the first three floors of residential accommodation. The affected units would all be dual or triple aspect however.

Blocks J and K

180. Balconies to proposed block J would be located a minimum of 7m off the boundary with a church at 9-11 Cottage Green. The church forms part of a mixed use development including office space, training facilities and recording studios which was granted consent in 2009 (reference: 08-AP-1476). It is permitted to open from 8am to 8pm Monday to Friday, 9am to 10pm on Saturday and 10am to 5pm on Sunday. The main part of the building is 2-storeys fronting Cottage Green, and it drops down in height at the rear where it extends right up to the site boundary, as does the existing building immediately adjoining part of the application site.
181. The block J balconies would face a small hospitality suite at the rear of the church which has no windows facing the application site. As such this relationship is considered to be acceptable. As stated, conditions have been included in the draft recommendation to ensure that the noise levels within the flats would fall within acceptable levels. If the church site ever came forward for redevelopment in the future, any residential building on it could be set a similar distance from the boundary. As such it is not considered that the proposal would unduly hinder redevelopment potential of the church site.
182. Block J would also be located 1.5m off the boundary with the scaffold yard, and concerns have been raised during public consultation that windows shown in its side elevation overlooking the yard would adversely affect the redevelopment potential of this adjoining site; the plans show that the windows would serve kitchens, bathrooms and secondary living room windows. Given this close relationship a condition is recommended requiring revised elevations and floorplans for this part of the block either showing the windows removed, or showing them as obscure glazed up to 1.8m high and top opening only.

Block M

183. The units in the southern section of proposed block M would be located just 1m off the boundary with an adjoining site at the rear. The adjoining site currently contains an open yard but has materials stacked to a high level along the site boundary. If this situation continues these units would have a limited level of outlook, although they would be dual or triple aspect, with duplex units spanning the ground and first floor levels.
184. Given this close relationship and so as not to unduly compromise the redevelopment potential of the adjoining site, a condition is recommended requiring the southern-most units in this terrace, at all floors of the building, to have their rear windows obscure-glazed up to 1.8m within the room and top-opening only.

Unit sizes

Units	SPD minimum sqm	Overall unit size (minimum) sqm	SPD minimum sqm	Amenity space sqm (minimum)
Studio	39 (37 with shower room)	39 (37 with shower room)	10	6.2
1-bed	50	50	10	4.5
2-bed	61-70	62	10	3.5
3-bed flats	74-95	86	10	7.2
3-bed duplexes or houses	84-102	87 (block A) 99 (block M)	50 10	45.8 11.2

185. All of the residential units would meet or exceed the minimum overall floorspace requirements set out in the Nationally Described Space Standards. Some of the individual rooms and storage spaces would fall short of the standards set out in the Residential Design Standards SPD however, with shortfalls ranging from 0.1-3.8sqm. As the overall unit sizes would comply with the required standards, this is considered to be acceptable.

Internal light levels

186. A Daylight Assessment based on the Building Research Establishment (BRE) Guidance has been submitted which considers light to the proposed dwellings using the Average Daylight Factor (ADF). ADF determines the natural internal light or day lit appearance of a room and the BRE guidance recommends an ADF of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens. For Annual Probable Sunlight Hours (APSH) the BRE guidance notes that the main requirement for sunlight is in livingrooms, and recommends that they receive at least 25% of the total annual total, 5% of which should be received during the winter months. Given that the results would improve higher up the buildings, only residential accommodation at ground to third floor level has been tested.
187. Of the 698 rooms tested, 545 (78%) would comply with the BRE guidance in relation to ADF. All of the rooms tested within proposed blocks A and C would comply with the guidance, and only one room within block B and one within block J would not comply; the affected rooms would serve an open plan living space in block B with an ADF of 1.33% and a lounge / diner in block J which would have an ADF of 1.46%.

Amenity space

188. Section 3 of the Residential Design Standards SPD sets out the council's amenity space requirements for residential developments. New houses should have a minimum of 50sqm of private garden space which should be at least 10m in length and extend across the full width of the dwelling. Flats should meet the following minimum standards and seek to exceed these where possible:

50sqm communal amenity space per development;

For units containing three or more bedrooms, 10sqm of private amenity space;

For units containing two or less bedrooms, 10sqm of private amenity space should ideally be provided. Where it is not possible to provide 10 sqm of private amenity

space, as much space as possible should be provided as private amenity space, with the remaining amount added towards the communal amenity space requirement; Balconies, terraces and roof gardens must be a minimum of 3sqm to count towards private amenity space.

189. 461 of the residential units (92%) would have access to private amenity space, although not all of the flats would have the required 10sqm, and two of the five houses would not have the required 50sqm (it is also noted that owing to the constrained nature of the northern part of the site the gardens to the block A houses would not be 10m in length – a minimum depth of 2-4m is proposed). Overall there would be a shortfall of 168sqm of private amenity space across the development which takes into account both the flats and the houses. There would also be 44 x 3+ bed units which would have less than 10sqm of private amenity space, with the lowest provision being 7.2sqm. It is noted that the 8% of units which would not have any private amenity space would all exceed the minimum standards in terms of overall unit size.
190. The SPD allows any shortfall in private amenity space to be made up for in the communal provision, and as 850sqm of communal amenity space would be provided throughout the development the shortfall would be met on site. It is noted that blocks A and C would not have their own communal space therefore residents of these blocks would need to be able to access communal space elsewhere within the development, and a condition requiring details of how this would be achieved has been included in the draft recommendation.
191. Overshadowing to the communal amenity spaces has been assessed, together with the front gardens to the block A houses and the back gardens to the block M duplexes. The BRE advises that for an amenity area to be adequately lit it should receive at least 2 hours sunlight over half of its area on the 21 March.
192. The communal spaces for blocks B, D/E, J/K, L/M and two private gardens to block M would all comply with the BRE guidance. The private gardens to blocks A and two of the block M units together with communal terraces for blocks F/G and H/I would not comply with the BRE guidance, with areas receiving at least two hours of sun on the ground ranging from 0% (blocks F/G, H/I) to 45% (block M). For the same test in June, taking into account the summer months when people are more likely to use their gardens, all but the block H/I amenity space would comply. For block H/I only 8% of the amenity space would receive more than 2 hours of sun on the ground, although it is noted that this would be linked by a footbridge to sunnier space at blocks F/G. Whilst it is noted that not all of the amenity space would comply with the BRE guidance in March, on balance this is considered to be acceptable given that most of the spaces would comply during the summer months.

Childrens' playspace

193. Using the play space calculator contained within the Mayor's Play and Informal Recreation SPG the proposed development would require the following amount of childrens' playspace:

810 sqm for under 5s
 500 sqm for 5-11 year olds
 290 sqm for 12+ year olds.

194. The proposal would provide 780sqm of playspace for the 0-5 age group which would be located in block E, the podium gardens between blocks F, G, H and I, and block L; a condition would be necessary to ensure that residents of all blocks would have access to childrens' playspace. There would be a shortfall of 820sqm of playspace on the site therefore a contribution of £123,820 would be required towards the 5-11 and 12+ provision which has been calculated in accordance with the Council's Adopted Planning Obligations and CIL SPD. Consideration has been given as to whether any playspace could be provided on the northern part of the site, but the applicant has advised that this would not be possible because the space is required for vehicle movements. The site adjoins Burgess Park which contains a range of facilities including an equipped playground, tennis courts and a BMX track.
195. To conclude, overall it is considered that good quality accommodation would be provided, with all of the units meeting or exceeding the Nationally Described Space Standards, and the majority of the units would receive good levels of internal daylight and would be dual or triple aspect. Whilst there would be some instances where the proposal would not comply with the Council's guidance in relation to room sizes and amenity space, these are not considered to be significant and would not warrant withholding permission.

Trees and landscaping

196. The scheme would require the removal of 9 existing trees, but 39 new trees would be planted resulting in an overall increase in canopy cover. This would be supplemented by other new landscaping which would improve biodiversity at the site.
197. An Arboricultural Survey and Impact Assessment has been submitted with the application and updated following the revisions to the scheme. There Arboricultural report advises that there are currently 13 individual trees and one group of trees on the site comprising 9 category B (moderate quality), 4 category C (low quality) and one category U (unsuitable for retention) trees and these are predominantly located around the edges of the site. It is noted however, that the group of trees (G1) and tree 1 (T1) are actually located within Burgess Park. There is a large London Plane on Parkhouse Street which is not within the site and is protected by Tree Preservation Order number 86B.
198. A total of 9 trees would need to be removed from the site in order to facilitate the development, comprising 5 category Bs, three category Cs and one category U. 39 new trees would be planted throughout the site, including along Parkhouse Street, Wells Way and the new central street, and the revisions to the scheme included amendments to some of the building footprints to allow sufficient space for the new trees to thrive. The proposal would result in a net increase in tree canopy cover, which is welcomed. Conditions are recommended to secure the new planting and to protect the retained trees during construction, including the off-site TPO tree which the arboricultural report notes could be affected, most likely through the repaving of the footway. A clause should be included in the s106 agreement requiring a contribution of £6k per tree if it transpires following further site investigations that any of the new trees cannot be planted.
199. Discussions have taken place with the Council's Parks and Open Spaces Team regarding proposed blocks A and B. Park trees are not currently trimmed back if they are close to residential properties. It is noted that new accommodation would be provided in an existing building to form block B close to existing trees, but the flats

would be dual aspect in any event. The Parks and Open Spaces Team has requested a 2.4m high solid boundary treatment along the park boundary next to block A, and this would be secured by way of a condition.

Landscaping

200. The proposed buildings would be set within a high quality landscaping scheme which would incorporate new public routes through the site, and this is considered to be a positive aspect of the proposal. The new public spaces would comprise the central street, the mews street leading from Parkhouse Street, and a small public square in front of the 12-storey tower which could be used for events such as markets. It is intended that the central street would be predominantly for pedestrians, with only around eight servicing vehicles using it on days when refuse would be collected, and fewer vehicles on other days. It would incorporate an activity strip down the middle which would allow for spill-out spaces and 'garden rooms' incorporating external seating for the commercial units which would line the route. The existing brick chimney would be retained as a feature in the site which is welcomed, and new tree planting would be provided. It is recommended that a condition requiring a detailed landscaping plan be imposed upon any forthcoming planning permission, and as stated, a clause inserted in the s106 agreement requiring public access to be maintained through the site.

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

201. 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 development where a 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.
202. A development of the size and scale proposed would have impacts upon the amenities of the occupiers of properties both adjoining and in the vicinity of the site. The application is accompanied by an Environmental Statement (ES) in order to ascertain the likely associated environmental impacts and how these impacts can be mitigated. The ES deals with the substantive environmental issues. An assessment then needs to be made as to whether the residual impacts would amount to such significant harm as to justify the refusal of planning permission.
203. Concerns have been raised by neighbouring residents including daylight / sunlight impacts, loss of privacy, and noise and disturbance.

Impact of the proposed uses

204. The proposed uses within the development would comprise Class A1-A4, B1 D2 and residential. Class B1 (business and office) uses generally sit comfortably near to residential properties, and the scale of the Class A (retail) and Class D (leisure) uses would not result in any significant loss of amenity. It is recommended that the opening hours of the Class A and D uses be limited to 7am to 11pm daily by way of a condition. Conditions are also recommended limiting servicing hours and plant noise

from the development.

205. Saved policy 3.11 (iv) of the Southwark Plan 'Efficient use of land' advises that proposals should not unreasonably compromise the development potential of, or legitimate activities on, neighbouring sites. The proposed development would introduce a significant quantum of residential properties in close proximity to existing industrial uses and this has been considered in detail in the quality of accommodation section of the report, as it would have implications for both existing neighbouring uses and future occupiers. Conditions have been included in the draft recommendation to ensure that the proposed dwellings would be adequately sound-proofed which would reduce the likelihood of noise complaints against existing businesses. Although in draft form it is noted that the site designation within the NSP is for this local preferred industrial location to change to a mixed-use neighbourhood, including residential use.

Privacy and overlooking

206. Southampton Way – There would be a window-to-window separation distance of 15-17m between first floor windows in the side elevation of proposed block A and windows at the rear of 29 and 31 Southampton Way. A condition for obscure glazing is therefore recommended.
207. Block C would contain a balcony directly facing 45 Southampton Way which would need to be screened to prevent any loss of privacy. As stated block C would also contain windows and a walkway on its rear elevation facing the residential and live/work units at the rear of 47 Southampton Way and the separation distance would be a minimum of 4.5m. A condition is therefore recommended requiring details of screening to be submitted for approval.
208. Windows in the side elevation of block J would be at least 30m from existing rear windows at 73-79 Southampton Way and as such no loss of privacy would occur.

1-13 Parkhouse Street

209. There would be a minimum separation distance of 16.1m between the rear of these properties and the houses in proposed block A. The ground floor windows would not cause any direct overlooking due to existing boundary treatment at the rear of the Parkhouse Street terrace, although there could be oblique views looking up towards upper floor windows. The two terraces of houses would face each other across a new access road and the Residential Design Standards SPD recommends a separation distance of at least 12m to maintain privacy. However, it is noted that this would be a new road, and the houses currently back onto an open yard. Block A would include small corner windows at first floor level serving bedrooms, although their primary aspect would be towards the rear of the more distant properties on Southampton Way. A condition requiring the portion of the corner window facing the Parkhouse Street terrace to be obscure glazed up to 1.8m within the room has been included in the draft recommendation in any event, to ensure that there would be no loss of privacy.



Section showing block a and 1-13 Parkhouse Street

210. The existing commercial building which would be converted to include residential accommodation in proposed block B already contains ground and first floor windows in its side elevation facing 13 Parkhouse Street, with the ground floor windows at a high level within the room. These windows are 7m away from windows in the flank elevation of 13 Parkhouse Street, across the existing access road. The first floor windows would serve residential accommodation as a result of the proposal, and new windows and balconies would be added through the extension to the building. A condition requiring privacy screens is therefore recommended, which could direct views towards Parkhouse Street or Burgess Park, and away from number 13.

Wells Way

211. There would be a minimum of 15m between windows within the proposed development and the properties on Wells Way. This would exceed the 12m recommended in the Residential Design Standards SPD where properties face each other across a street.

Cottage Green

212. The closest property on Cottage Green would be approximately 55m from windows at the rear of proposed block J and as such no loss of privacy would occur.

Daylight, sunlight and overshadowing

213. A daylight and sunlight report has been submitted as part of the Environmental Statement. The report assesses the scheme based on the BRE guidance on daylight and sunlight. The following tests have been undertaken:
214. Vertical Sky Component (VSC) is the amount of skylight reaching a window expressed as a percentage. The guidance recommends that the windows of neighbouring properties achieve a VSC of at least 27%, and notes that if the VSC is reduced to no less than 0.8 times its former value (i.e. 20% reduction) following the construction of a development, then the reduction will not be noticeable.
215. No-Sky Line (NSL) is the area of a room at desk height that can see the sky. The guidance suggests that the NSL should not be reduced to less than 0.8 times its former value (i.e. no more than a 20% reduction). This is also known as daylight distribution.
216. Sunlight - Annual Probable Sunlight Hours (APSH). 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). The guidance advises that windows should receive at least 25% APSH, with 5% of this total being enjoyed during the winter months. If a window receives less than 25% of the APSH or less than 5% of the APSH during winter, and is reduced to less than 0.8 times its former value during either period and has a reduction in sunlight received over the whole year of greater than 4%, then sunlight to the building may be adversely affected.
217. The ES describes the impacts upon VSC, NSL and APSH as follows:

Reduction	Level of impact
0-20%	Very low (negligible effect)
20.1-30%	Low (minor effect)
30.1%-40%	Medium (moderate effect)
40.1%+	High (major effect)

218. The ES considers the impact on the following neighbouring buildings:
- 1-6, 79, 1-12 (these are the listed buildings at 73, 75 and 77 Southampton Way), 33-47 (odds) Southampton Way
 1-13 (odds) Parkhouse Street
 77-115 (odds) Wells Way
 1-3 Cottage Green (Collingwood House)
 8-14 (evens) Cottage Green
219. The impact upon these properties has been assessed in relation to the completed development which would be the worst case scenario and as such the ES does not consider daylight and sunlight impacts during construction.
220. The daylight report considers a large number of rooms around the site. For VSC, of the 310 windows tested, 223 (72%) would comply with the BRE guidance and as such would experience a negligible effect. For NSL, of the 218 rooms tested, 159 (73%) would comply with the BRE guidance, and for APSH of the 119 windows tested, 112 (94%) would comply with the BRE guidance.

Southampton Way

221. The properties on Southampton Way are located to the north-west and south-west of the application site. All of the windows for all but one of the properties tested would comply with the BRE guidance in relation to VSC.
222. At 47 Southampton Way 15 windows would comply with the BRE guidance on VSC and 12 would not. This property is one half of an attractive semi-detached pair which has been converted into four flats. It also has a 2-storey building at the rear, and the planning history suggests that it contains two live/work units on the ground floor and two residential units above, all granted under Lawful Development Certificates. The ground floor live / work units are likely to have a very poor quality outlook because they are single aspect facing onto the existing single-storey car wash building within the application site which extends right up to the boundary with number 47. The first floor residential accommodation looks out over the roof of the car wash and as such has a good level of outlook across Parkhouse Street.
223. Proposed block C would be 3-storeys high and would be located directly in front of these live/work and residential windows. Although it would be located 3-7m away from this neighbouring building, its increased height would have a significant adverse effect upon daylight and outlook to these windows, with one window experiencing a moderate adverse effect and 11 windows experiencing a major adverse effect. The moderate and major effects would range from 39% to 79% reductions in VSC and at least 9 of these windows are likely to serve habitable accommodation. The affected windows would have VSCs ranging from 4.63% (reduced from 11.99%) to 15.33 (reduced from 25.21).
224. For NSL, 82% of the windows tested would comply with the BRE guidance and 18% (14 rooms) would not, with four properties affected. Of these, two rooms would experience minor effects, 4 would experience moderate effects, and 8 would experience major effects. Most of the windows affected would be within the accommodation at the rear of 47 Southampton Way described above, where 8 windows would experience major effects, and the moderate and major effect reductions would range from 27% to 81%.
225. The significant adverse effects upon the two residential properties and two live / work units at the rear of 47 Southampton Way are noted. This harm must be weighed in the balance with all of the benefits and disbenefits of the proposal, and in this instance given the significant amount of good quality new residential accommodation which would be provided, including 35% affordable housing, officers consider that the benefits would outweigh the harm cause to these four existing units.

Parkhouse Street

226. This terrace of 7 buildings contains flats on the ground floor and flats and maisonettes above. With the exception of number 13, the amendments to the proposal have improved the daylight situation to the Parkhouse Street terrace compared to the original submission, resulting in an additional 13 windows complying with the BRE guidance. Of the 79 windows tested for VSC, 46 (58%) would comply with the BRE guidance and 33 (42%) would not comply, with 8 windows experiencing a minor effect, 21 experiencing a moderate effect, and 4 experiencing a major effect. For the windows experiencing moderate and major effects the VSC reductions would range

from 32% to 51%. For 1-11 Parkhouse Street the affected windows would all be at the front of the buildings, and they would have retained VSCs ranging from 17.45% to 22.53% as a result of the proposal.

227. The impacts upon 13 Parkhouse Street would be greater, and whilst the amendments to the proposal have resulted in two rear windows complying the BRE guidance where previously they would not have, there would now be four windows which would experience major effects whereas previously there were only three. At the front of number 13 the retained VSCs would range from 16.54% to 25.60%, and all of the windows at the rear would comply with the BRE guidance. The significant impacts would be to the windows at the side of the property. The layout of the upper floor maisonette is not known, but at ground floor level the side windows serve a bedroom and a dining room. The retained VSC for the bedroom would be 8.22% and to the dining room it would be 6.58%, although this room is served by another window which faces down the rear garden. The first floor side windows would have retained VSCs of 11.93% and 15.08%, and another would comply with the BRE guidance
228. For NSL, of the 53 rooms tested 41 (77%) would comply with the BRE guidance and 12 (23%) would not, with one window experiencing a minor effect, 9 experiencing a moderate effect, and two experiencing a major effect. The moderate and major effects would be reductions ranging from 36% to 63%.
229. Whilst the changes to the proposal have resulted in some improvements to daylight at to number 13, to some windows the impact would be worsened. The changes would however result in a much better outlook from this property, which under the previous plans would have been almost completely surrounded by new buildings in close proximity. The previous plans showed block A as 3-storeys high and constructed right at the end of the Parkhouse Street rear gardens. The front part of block B would have been attached to the flank wall of number 13 and the back part of it would have joined up with block A, creating a continuous block immediately at the rear of the Parkhouse Street terrace. There would however, have been a gap between the front and back parts of block B which would have allowed more light to the side windows in number 13.
230. The current proposal is considered to be a much more neighbourly relationship, with block A reduced in height and set back from the rear gardens of the existing terrace increasing the separation distances from a minimum of 9.9m to between 16.1m – 24.6m when measured from the back of the outriggers to the Parkhouse Street properties. Although an existing building would be extended upwards to form block B, the existing 7m wide gap between it and the flank elevation of number 13 would be maintained.

Wells Way

231. These properties are located to the east of the application site, on the eastern side of Wells Way. Of the 67 windows tested for VSC, 25 (37%) would comply with the BRE guidance and 42 (63%) would not, with 5 windows experiencing a minor effect, 20 experiencing a moderate effect, and 17 experiencing a major effect. For the windows experiencing moderate and major effects the VSC reductions would range from 31% to 50%, with resultant VSCs ranging from 17.23% to 26.11%.
232. For NSL, of the 50 rooms tested, 17 (34%) would comply with the BRE guidance and 33 (66%) would not, with 10 windows experiencing a minor effect, 6 experiencing a

moderate effect, and 17 experiencing a major effect. The moderate and major effects would be reductions ranging from 32% to 69%.

233. Whilst the major effects to these properties are noted, this is partly because some of them sit opposite part of the application site which contains a low-rise building of less than 2-storeys in height and an open area of parking, therefore some of the existing properties have very high existing VSCs up to 37.68%.

1-3 (Collingwood House) and 8-14 Cottage Green

234. For VSC and NSL all of the windows tested would comply with the BRE guidance.

Sunlight

235. All of the properties tested on Southampton Way, Parkhouse Street and Cottage Green would comply with the BRE guidance relating to APSH.
236. On Wells Way, of the 67 windows tested, 60 (90%) would comply with the BRE guidance and 7 (10%) would not. Of these, one window would experience a minor effect, one would experience a moderate effect, and 5 would experience major effects. The moderate and major effects would experience percentage reductions in their APSH ranging from 32% to 74%, with resultant APSHs ranging from 7% to 24%. Whilst these impacts are noted, this is considered to be acceptable when weighed in the balance with the other benefits arising from the proposal.

Overshadowing

237. As stated the BRE guidance advises that for an amenity area to be adequately lit it should receive at least 2 hours sunlight over half of its area on the 21st March. If the area receiving 2 hours sunlight is reduced by more than 20% it is considered that the change may be noticeable. The ES tests the impacts upon the gardens to 1-13 Parkhouse Street which would comply with the BRE guidance.
238. Following concerns from neighbouring residents that the gardens to the Wells Way properties had not been subject to this test, the applicant has submitted an additional drawing which shows that the impacts would comply with the BRE guidance. The gardens to properties on Southampton Way and Cottage Green have not been tested owing to their orientation relative to and distance from the site, which means that they would not experience any overshadowing.
239. Transient overshadowing drawings have also been submitted which demonstrate that there would be some additional shadowing onto Burgess Park between 9am and 1pm on March 21st. The affected area is heavily treed, and the Council's Ecology Officer has reviewed the application and has not raised any concerns regarding the proposal.

Light pollution

240. Lighting for the proposed development would include lighting poles to the primary public realm, to the buildings along the Mews, and existing street lighting along Parkhouse Street which would be retained or replaced (details to be secured through the s106 agreement). A compliance condition to ensure that the lighting would not cause any loss of amenity to neighbouring occupiers or harm to bats has been included in the draft recommendation, on the advice of the Council's Ecology Officer.

Conclusion on amenity impacts

241. To conclude, it is recognised that there would be some adverse impacts upon some of the neighbouring residential properties in terms of daylight and sunlight, and whilst the revisions to the proposal have resulted in improvements for some properties, impacts would be more significant for others. Along Wells Way the impacts are in part owing to an existing low-rise building and open areas of parking on the part of the site which sit opposite these residential properties. However, for the most part the retained VSCs would be reasonably high, and consistent with other schemes within the urban density zone.
242. Daylight and sunlight is only one element of amenity, and the existing neighbouring buildings would benefit from improved outlook over well-designed new buildings rather than the existing, rather run down industrial estate. They would also benefit from access to the proposed retail and leisure space within the development. The daylight and sunlight impacts must be weighed in the balance with all of the other positive and negative impacts of the proposal and given the significant positive impacts which would arise, officers consider that the benefits would outweigh the harm in this instance, and that impact upon amenity would not be sufficient to withhold planning permission.

Noise and vibration

243. Noise and vibration is considered in chapter 8 of the ES, which considers impacts from demolition and construction activities and from the completed and operational development. Concerns have been raised by neighbouring residents regarding noise and disturbance during construction, and from the completed development.

Demolition and construction

244. The ES predicts that demolition and construction work would result in adverse, major, short-term local impacts upon the surrounding properties on Southampton Way, Parkhouse Street, Wells Way and Cottage Green. Regarding vibration, the ES predicts that the impacts would range from negligible to short-term, major adverse effects but would not be of a magnitude that would cause any damage to buildings. The ES recommends that a construction management plan be required, and in consultation with the Environmental Protection Team a condition to secure this has been included in the draft recommendation.

Completed development

245. The suitability of the site for residential use and necessary mitigation has been considered in the 'Quality of accommodation' section of this report. Noise from the completed development would emanate from plant, the proposed commercial uses and servicing activities, and conditions to address these issues have been included in the draft recommendation. With mitigation measures in place the ES predicts that there would be no likely significant effects in relation to noise and vibration.

Transport issues

246. The proposed development would incorporate 15 accessible parking spaces at various locations across the site. Servicing would take place from within the site,

including from a yard area accessed through block L, and from the central and mews streets. The proposal would result in additional vehicle trips, details of which are set out below, but these would not have an adverse impact on the highway network. Neighbouring residents have raised a number of transport related concerns including lack of car and cycle parking, impact upon public transport, and increased traffic on the surrounding roads.

247. Strategic policy 2 of the Core Strategy 'Sustainable transport' advises that the Council will encourage walking, cycling and the use of public transport rather than travel by car. Saved policy 5.1 of the Southwark Plan seeks to ensure that development is located near transport nodes, and saved policy 5.2 of the Southwark Plan seeks to ensure that developments do not result in adverse highway conditions; saved policy 5.3 requires that the needs of pedestrians and cyclists to be considered and saved policy 5.6 establishes maximum parking standards. Traffic and transport is considered in chapter 7 of the ES and an addendum to the Transport Assessment.
248. The site has a public transport accessibility level (PTAL) of 2 (low) and is within the East Camberwell Controlled Parking Zone (CPZ). It is approximately 480 metres and 2.4km (westerly) to the bus routes on the A215 Camberwell Road and Elephant and Castle train/tube station respectively, and there is a bus stop outside the site on Wells Way serving routes 343 and 136.

Demolition and construction

249. The ES predicts that during the peak construction period in 2019 there would be 20 construction vehicles per hour, 10 going into the site and 10 coming out, and a maximum of 100 vehicle movements per day (50 vehicles in and 50 vehicles out); there would be a general policy of not providing any parking for construction workers. This would represent a reduction in vehicle movements compared to the existing usage of the site, although there would be an increase in the number of Heavy Goods Vehicles (HGVs). The highest increase would be along Wells Way which could experience 75 2-way HGV movements per day, but the ES predicts that this would have no impact on pedestrians. An outline construction logistics plan has been provided, but a condition for detailed construction management plan has been included in the draft recommendation which would consider issues such as vehicle routing and delivery times. With mitigation in place the ES predicts that there would be no significant transport impacts during demolition and construction.

Completed development

250. Access and servicing arrangements - The proposed central street would operate as a one-way system westbound, exiting back onto Parkhouse Street which is one-way from east to west. It would predominantly be used by pedestrians and cyclists, together with refuse vehicles and for some deliveries. Vehicle access would be managed by a site management team and automatic drop bollards connected to the site management via intercom would be provided at the site entrances on Parkhouse Street and Wells Way.
251. Servicing for the proposed commercial units would predominantly take place from two yards at the rears of blocks C and J which would be able to accommodate 5.3m long vans and from the new mews street, and this would be overseen by the site management. Approximately eight servicing vehicles would use the central street on days when refuse would be collected, and fewer vehicles on other days, allowing it to

remain as predominantly pedestrian. The TA advises that most residential deliveries would take place outside of peak hours and could be accommodated within the proposed yards, and there would be a 24/7 concierge who could take receipt of deliveries on behalf of residents and place them in a store room for collection.

252. With the exception of block A, each block would have its own refuse store; bins for the block A houses would be transferred to the block B bin store by the site management. Refuse would be collected from the stores on Parkhouse Street and the new central street and a condition securing the provision of the refuse stores is recommended, together with a condition for a detailed servicing and delivery management plan and a s106 obligation for a servicing bond.

Trip generation

253. The ES predicts that the completed development would result a small reduction in vehicle trips compared to the existing situation. However, officers consider that vehicle trips would increase. Officers' own assessment suggests that there would be 80 and 106 two-way vehicle movements in the morning and evening peak hours respectively which includes servicing trips, and when compared with the observed vehicular traffic at the site means that it would create 44 and 63 additional two-way vehicle movements in the morning and evening peak hours. However, even taking into account likely vehicle movements from other committed developments in this locality it is considered that these would not have any noticeable adverse impact on existing vehicular traffic on the surrounding roads.

Parking

254. There are currently around 50 car parking spaces within the main part of the site, and the area at the rear of 1-13 Parkhouse Street was formerly used for minibus parking. There would be 15 accessible parking spaces provided on the site which would be located next to blocks A and B and at the rear of block J. This would equate to 3% provision and concerns have been raised by neighbouring residents that the proposed level of parking would be insufficient.
255. The CPZ controls on-street parking in the vicinity of the site on weekdays from 0830hrs to 1830hrs. Although the proposed level of car parking would be minimal, the proposal would deliver two car club spaces together with three years membership for every eligible adult within the development which should be secured within the s106 agreement. As set out below, a contribution to increase bus capacity would be provided if overcrowding occurs, and future occupiers of the development would be prevented from obtaining parking permits in the CPZ. The on-site parking spaces would have electric vehicle charging points in accordance with the London Plan and a condition to secure this is recommended.

Pedestrians and cyclists

Pedestrians

256. Following consultations with the Council's Highways Development Management Team and Transport for London (TfL) a number of highway measures would be required in order to provide a safe pedestrian environment within and surrounding the site. This includes the provision of a pedestrian crossing on Wells Way, a raised table on Parkhouse Street, the repaving of the footways around the site, and a widened

pavement along Wells Way. The required servicing management plan which would be secured by way of a condition would deal with how pedestrians, cyclists and vehicles within the site would be managed to minimise any conflict, including restricting the hours during which servicing vehicles could use the central street and the provision of retractable bollards at the site entrances to prevent unauthorised access.

Cyclists

257. The current London Plan requires 846 long-stay and 33 short-stay cycle parking spaces to serve the development. The proposal would exceed this by providing 862 long-stay and 34 short-stay spaces at various locations across the site. With the exception of block A each block would have its own dedicated cycle store, and additional spaces would be provided in the public realm. The cycle parking would be a mix of Sheffield stands and stacked units and a condition requiring full details is recommended, which should include details of block A cycle parking and provision for cargo bikes and bikes adapted for mobility aids. It is noted that TfL has requested that cycle parking in line with the more onerous standards in the draft London Plan be provided, but this would require a significant amount of additional space.
258. A revised comment from TfL has been submitted requesting a contribution of £150k for the delivery of a cycle hire docking station for 18 bikes in the vicinity of the site, and this has been included in the draft s106 agreement.
259. Concerns have been raised by neighbouring residents that the proposal would remove an existing cycle lane along Wells Way. Whilst it is not shown on the drawings, it is not proposed to remove the cycle lane.

Impact on public transport

260. The Transport Assessment (TA) estimates that the proposal would result in 142 and 120 two-way public transport trips in the morning and evening peaks hours respectively, which would be similar to the 130 and 118 existing trips. However, officers consider that public transport trips would be significantly higher than this, with 245 trips in the morning and evening peaks respectively, equating to increases of 89% and 108%. Concerns have been raised by neighbouring residents that this would make the busses overcrowded, and that the transport information contained in the TA is out of date because it is based on data from the last census which was in 2011.
261. The impact on buses falls within the remit of TfL which has reviewed the application and advised that it is not clear whether there would be bus capacity issues, owing to changes linked to the Old Kent Road Opportunity Area and mitigation already secured through other developments. TfL has therefore requested a contribution of £90k if there is overcrowding on the local bus network within the first two years of occupation or occupation of 300 homes (whichever is sooner), and this would be secured through the s106 agreement. TfL has used bus capacity data from July 2017 to inform their advice.
262. The ES predicts that the completed development would have a negligible impact upon London Underground and National Rail services.
263. In relation to traffic and transport the ES concludes that there would be no significant effects. Although it is considered that the proposal would result in an increase in vehicle and public transport trips to and from the site, officers concur with this overall

conclusion.

Air quality

264. The site sits within an air quality management area. Policy 7.14 of the London Plan 'Improving Air Quality' seeks to minimise the impact of development on air quality, and sets a number of requirements including minimising exposure to existing poor air quality, reducing emissions from the demolition and construction of buildings, being at least 'air quality neutral', and not leading to a deterioration in air quality. A number of neighbouring residents have raised impacts upon air quality as a concern following public consultation on the application, including why no monitoring has been undertaken on Parkhouse Street. EPT has advised that with the exception of uses which generate emissions, such as incinerators, there is no agreed protocol for measuring air quality at specific sites, and that air quality assessments use information from air quality measuring stations which are at various locations across the borough.
265. The impact upon air quality is considered in chapter 9 of the ES. It considers impacts upon surrounding receptors, together with impacts upon future occupiers of the site.

Demolition and construction

266. Demolition and construction activities could result in dust which would impact upon air quality. Measures to reduce this would be secured in a construction management plan including the damping down of highways and the use of wheel washing facilities and a condition for a construction management plan has been included in the draft recommendation. The ES concludes that subject to mitigation measures, the demolition and construction impacts would not result in any significant air quality effects.

Completed development

267. The ES advises that the main air quality impacts upon existing occupiers and future occupiers of the proposed development would be from road traffic and plant emissions, although it notes that traffic on the surrounding roads would decrease as a result of the development which would improve air quality. The ES therefore concludes that the completed development would not result in any significant air quality effects to existing receptors and that air quality for future residents within the development would be acceptable.
268. Although officers consider that vehicle trips from the proposed would be higher than existing, with the higher trip rates factored in, the proposal would be air quality neutral.
269. EPT has reviewed the application and concur with the findings of the air quality assessment contained within the Environmental Statement, and concur that the proposal would not cause any exceedances of the air quality objectives and that no mitigation measures are required for the completed development.

Ground conditions and contamination

270. Policy 5.21 of the London Plan advises that appropriate measures should be taken to ensure that development on previously contaminated land does not activate or spread contamination.

271. An Environmental Risk Assessment report has been submitted which advises that contamination is likely to be present on the site owing to its existing industrial nature and historical uses. The report has been reviewed by EPT and Environment Agency, both of which recommend a condition for further contamination investigations and remediation.
272. The area was extensively bombed during WWII therefore the potential exists for unexploded ordnance (UXO) to be found during construction works. The submission advises that a watching brief for UXO would be maintained during excavation works and an informative to this effect is recommended.

Flood risk

273. Policy 5.13 of the London Plan advises that development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water runoff is managed as close to its source as possible. A Flood Risk Assessment (FRA) and Outline Surface Water Drainage Strategy have been submitted with the application, together with a basement impact assessment and basement construction method statement; it is noted however, that following the revisions to the scheme a basement is no longer proposed. Neighbouring residents have raised concerns regarding the long term viability of the proposal given that the site is located in a flood risk zone, lack of sewerage capacity, and that drainage on Wells Way is insufficient.
274. The site is located in flood zone 3 which is identified as having a high risk of flooding. The NPPF advises that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. However, the Council's Strategic Flood Risk Assessment acknowledges that development within flood zone 3 is required, and is allowed with the application of the Exception Test set out the NPPF.
275. For the Exception Test to be passed it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, and that a site-specific flood risk assessment must demonstrate that no adverse impacts would occur.
276. The site is located on previously developed land and there are strong sustainability reasons why it should be redeveloped. The development of brownfield sites such as this will be necessary if accommodation is to be provided to meet the current shortfall of housing. The proposed design is capable of providing good quality housing, with much of the development containing less vulnerable commercial space at ground floor level. It is also noted that the site is a proposal site in the draft NSP, which anticipates business and residential development.
277. The FRA advises that the majority of the site has a very low risk of surface water flooding, and Wells Way and Parkhouse Street have areas of medium and high risk of surface water flooding. With regard to ground water, it advises that the overall ground water flood risk for the development would be low. The FRA advises that finished floor levels would be raised 300mm above the existing ground, and the site management would sign up to the Environment Agency's flood warning service.
278. The application has been reviewed by the Environment Agency, Thames Water and

the Council's Flood Risk and Drainage Team, and a number of conditions and informatives are recommended. Runoff rates would be limited to the equivalent greenfield rates.

Sustainable development implications

279. 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. It states that where it is clearly demonstrated that the specific targets cannot be fully achieved on-site, any shortfall may be provided off-site or through a cash in lieu contribution to the relevant borough to be ring fenced to secure delivery of carbon dioxide savings elsewhere. Policies 5.5 and 5.6 require consideration of decentralised energy networks and policy 5.7 requires the use of onsite 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.
280. The applicant has submitted an Energy Statement in support of the application based on the Mayor's energy hierarchy, and which has been updated to reflect the changes to the scheme.
281. Be lean - Measures under this category would include high levels of insulation and air tightness and would result in a 13.63% carbon dioxide reduction when compared with a scheme compliant with the Building Regulations.
282. Be clean – The previous version of the proposal included a basement which would have accommodated combined heat and power (CHP) plant. Following the revisions to the proposal and omission of the basement, CHP is no longer considered feasible. There are no planned district heating networks in this area, therefore no carbon dioxide emissions savings would be achieved under this category. However, the s106 agreement would require the development to be future-proofed for connection in the event that a network were to come online.
283. Be green - Photovoltaic panels would be provided which would result in a 25.19% carbon dioxide reduction when compared with a scheme compliant with the Building Regulations.
284. A combination of the above measures would result in a 35.38% reduction in carbon dioxide emissions when compared with a scheme compliant with the Building Regulations. This would equate to a 37.33% reduction for the residential element and a 26.74% reduction for the commercial element. A contribution of £90k towards the Council's Carbon Off-set Green Fund is therefore required, and would be secured through the s106 agreement. It is recommended that the carbon savings be reviewed post-construction, which may require an adjustment to the s106 contribution amount.
285. Southwark's strategic policy 13 of the Core Strategy 'High environmental standards' requires developments to meet the highest possible environmental standards, and sets the following targets relevant to the application:
 - Community facilities should include at least BREEAM 'very good';
 - All other non-residential development should achieve at least BREEAM 'excellent';

- Major developments should achieve a 44% saving in carbon dioxide emissions above the building regulations from energy efficiency, efficient energy supply and renewable energy generation;
- Major development must achieve a reduction in carbon dioxide of 20% from using onsite or local low and zero carbon sources of energy;
- Major housing developments must achieve a potable water use target of 105 litres per person per day.

286. The submission advises that the A and B class floorspace would achieve the required BREEAM 'excellent'. The score for the D class floorspace is not stated, therefore a condition is recommended requiring it to achieve at least 'very good'. The development would achieve a 25.19% reduction in carbon dioxide emissions through the use of renewable energy, and the residential component would achieve a potable water use target of 105 litres per person per day.

Overheating

287. An Overheating Mitigation Strategy has been submitted which advises that factors such as building orientations, glazing ratios and window operability have been taken into account when considering the potential risk of overheating. The commercial units would require mechanical ventilation, and a condition is recommended requiring details to be submitted for approval.

Conclusion to sustainability implications

288. Saved policy 3.3 of the Southwark Plan advises that planning permission will not be granted for major development unless the applicant demonstrates that the economic, environmental and social impacts of the proposal have been addressed through a sustainability assessment; the applicant has submitted a Sustainability Statement to address this requirement. These issues are also considered in a number of the other planning application documents including the ES, the Equalities Statement and the Energy Strategy.

289. The proposed development would generate a significant number of construction jobs and the construction process would give rise to expenditure in the local economy. It is estimated that 255 jobs would be created in the completed development which would contribute to the local economy. Assistance would be provided to the Continental Car Wash which would be displaced as a result of the proposal, and affordable workspace would be provided in the completed development. A significant amount of new housing including 35% affordable housing would be provided, and borough CIL contributions would be secured to contribute towards the infrastructure required to support growth. Measures to reduce carbon dioxide emissions would be incorporated into the scheme.

Archaeology

290. Policy 7.8 of the London Plan advises that new development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset. Saved policy 3.19 of the Southwark Plan is also relevant,

which sets out the Council's approach to protecting and preserving archaeology within the borough.

291. The site does not lie in a Council designated Archaeological Priority Zone (APZ), but current guidance from Historic England advises that all major planning applications on sites over 0.5 hectares - whether in an APZ or not - should be considered for archaeological interest.
292. An initial appraisal indicates that there is little available data on the potential for significant early archaeological remains to survive on the site. An archaeological Desk Based Assessment submitted with the application advises that a watching brief should be undertaken and works monitored during construction. However, given that the archaeological potential of the site is unknown, it is recommended that a detailed archaeological evaluation be carried out and conditions to secure this have been included in the draft recommendation. An archaeological monitoring contribution of £11,171 is also required, and this should be secured through the s106 agreement.

Wind microclimate

293. This issue is covered in chapter 11 of the ES which considers the likely wind conditions as a result of the proposed development, and the suitability of those conditions for pedestrian comfort. It considers the completed development only, and not the demolition and construction phase. It is noted that there would be hoarding around the site during construction works in any event.

Completed development

294. Within the completed development wind conditions at ground level would be acceptable for sitting to strolling and with the exception of four private balconies, wind conditions within the private and communal amenity space would be acceptable; a condition is recommended requiring solid balustrades for the four balconies which would bring wind conditions to acceptable levels.

Ecology

295. Policy 7.19 of the London Plan 'Biodiversity and access to nature' requires development proposals to make a positive contribution to the protection, enhancement, creation and management of biodiversity wherever possible. Saved policy 3.28 of the Southwark Plan states that the Local Planning Authority will take biodiversity into account in its determination of all planning applications and will encourage the inclusion in developments of features which enhance biodiversity, and will require an ecological assessment where relevant. A preliminary ecological appraisal and bat presence survey have been submitted in support of the application.
296. The site is not subject to any ecological designations, but the northern part of the site adjoins Burgess Park which is a Site of Importance for Nature Conservation (SINC). The part of the park which immediately adjoins the site is known as the Nature Area and has recently undergone an extensive enhancement project as part of the phased work of the Burgess Park Master Plan. It is not however, designated as a Local Nature Reserve.
297. The assessments undertaken show that the application site has a limited ecological value, although the removal of shrubs and trees should take place outside of the

nesting bird season and an informative to this effect is recommended. The ecological appraisal advises that the site has low potential to support roosting bats and recommends that additional emergency / re-entry survey work be carried out for 45 Southampton Way. This has been undertaken and no bats were seen emerging from the building, although the site is used as a bat commuting route.

298. The application has been reviewed by the Council's Ecology Officer who has advised that the surveys are acceptable, and that no further surveys are required. No objections have been raised by Natural England. Details of the boundary treatment with Burgess Park are required, and this could be secured by way of a condition. It is noted that the Bat Presence report recommends a native hedge along this boundary, but the Parks and Open Spaces Team requires the boundary treatment to be solid. There are trees within the park which are close to the boundary, therefore care would need to be taken not to damage them when constructing the boundary treatment. Bats are known to use Burgess Park therefore any external lighting from the development would need to be controlled by way of a condition to ensure that it would not have any adverse impacts upon bats.
299. Through the provision of new planting and amenity areas the proposal has the potential to improve biodiversity at the site. Conditions to secure this including for landscaping details, brown roofs, bat boxes and bird bricks together with measures to deal with Japanese Knotweed at the site have been included in the draft recommendation.

Socio-economic impacts and health

300. This is considered in chapter 6 of the ES. Concerns have been raised regarding pressure on local services as a result of the proposal.

Demolition and construction

301. The ES predicts that there would be 435 construction workers on the site over the course of the 3 year construction period. It predicts that these construction workers would spend approximately £1.8m in the local area during the course of the construction period. The ES advises that the construction phase of the development could increase trips to hospital A&E departments by 0.005% which would be a minor adverse impact.

Completed development

302. The completed development would support approximately 255 jobs, significantly more than existing, and the new resident population is predicted to result in £6.4m of expenditure in the local area per year; the proposal would contribute almost a fifth of the borough's annual housing target, albeit delivered over a 3 year build period.
303. With regard to impacts upon services, the ES advises that the completed development could increase trips to Accident and Emergency by less 0.15%. With regard to GP provision, there are currently 23 surgeries within a mile of the site supported by 97 doctors, and all are accepting new patients. The Department for Health recommends a target patient list size of 1,800 patients per GP, and the average across the 23 surgeries is 1, 622. If all the people working and living at the site used the existing local GP surgeries, which is unlikely, this would increase to 1, 666, which would be within the recommended list size.

304. With regard to education, the ES advises that early years provision is constrained and the development would pose an additional burden on this. It advises that this would have a long term, adverse effect of minor scale at the local level, but that the effect would not be significant. The ES advises that there would be sufficient capacity to accommodate children within the proposed development requiring primary, secondary and further education. The ES concludes that the only significant effects would be a moderate, beneficial, long term effect on housing provision at a borough level and on the local economy through increased spending in the local area.

Planning obligations (S.106 undertaking or agreement)

305. 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.
306. The following would be required and would be secured through the s106 agreement:

Financial contributions

Topic	Contribution
Loss of B class floorspace contribution	£84,349
Childrens' playspace contribution	£123,820
Cycle hire docking station contribution	£150k
Bus contribution if overcrowding occurs	£90k
Carbon Off-set Green Fund contribution	£90k
Archaeology contribution	£11,171
Contribution towards countdown facilities for bus stop on Wells Way (unless already provided by the Big Yellow Development)	£40k
Affordable housing monitoring fee	£22,922.50
Servicing bond contribution	£25,390
TOTAL	£637,652.50
S106 monitoring contribution (2% of total - to be adjusted if bus count down facilities provided by another development)	£12,753.05
GRAND TOTAL	£650,405.55

Non-financial obligations

- 307.
- Employment during construction and in the completed development provisions;
 - Delivery of the commercial space before a proportion of the residential space can be occupied;
 - The appointment of a workspace provider for the affordable workspace;
 - Estate management strategy;
 - Commercial units management plan;
 - Provision of affordable workspace;
 - Assistance for the Continental Car Wash to find a new site should they wish;

- Terms to assist Swiss Postal to relocate within the development should they wish;
- Public access through the site;
- Provision of affordable housing;
- Parking permit exemption;
- District heating future proofing provisions;
- Provision of 2 car club spaces and 3 years membership for each eligible resident within the development and each business;
- Tree contribution of £6K per tree for any proposed tree which cannot be planted on the site;
- Post-construction review of carbon dioxide savings.

308. Highway works which would be delivered through a s278 agreement comprising:

- Improvements to the junction of Wells Way with Parkhouse Street to enable it to accommodate HGVs;
- Resurface the carriageway of Parkhouse Street from its junction with Wells Way to its junction with Southampton Way.
- Re-paving the footways on Parkhouse Street and Wells Way with the widened Wells Way footway to be adopted;
- Planting of new trees on the highway;
- Speed cushions outside no.37 Parkhouse Street to be removed and a raised carpet installed at the proposed Mews junction with Parkhouse Street;
- Speed cushions outside 5 Parkhouse Street to be converted to a traffic carpet;
- Provision of new drainage gullies on Parkhouse Street where traffic carpets are introduced;
- Upgrade the street lighting on Parkhouse Street to reflect the changed highway layout and in line with current standards;
- Provision of a pedestrian crossing on Wells Way.

309. In the event that a satisfactory legal agreement has not been entered into by 27th May 2019 it is recommended that the Director of Planning be authorised to refuse planning permission, if appropriate, for the following reason:

The proposal, by failing to 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 (2016) and the Planning Obligations and Community Infrastructure Levy SPD (2015).

Community infrastructure Levy (CIL)

310. 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.

311. 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 to support growth. In this instance a Mayoral CIL payment (pre-affordable housing relief) of £1,855,605.06 and a Southwark CIL payment of £2,143,478.89 would be required.

Statement of community involvement

312. A Statement of Community Involvement (SCI) has been submitted with the application which sets out consultation on the proposal which was undertaken by the developer before the planning application was submitted. Approximately 5,200 newsletters were sent to local residents and businesses, advising them of the proposals and upcoming consultation events. Meetings were held with 11 local groups / representatives including some of the Parkhouse Street residents, Wells Way Triangle Residents' Association and Friends of Burgess Park. Two workshop sessions were held on 15th and 17th June 2017 which were attended by approximately 70 people over the two days and a public exhibition was held at the site on 12th and 13th December 2017 which was attended by 32 people. A dedicated email address and telephone line were set up during the public consultation to respond to any enquiries.
313. Feedback received included support for the concept of redeveloping the site and the provision of new creative / maker space within the development, together with support for the provision of new public realm and space which could be used by the community. Concerns raised included the height and density of the proposal, assurance that affordable housing would be provided, noise and disturbance from the commercial space and during construction, lack of parking, flood risk, and impact upon public transport and public services. There were mixed views regarding a proposed route from the site to Burgess Park.
314. A number of amendments were subsequently made to the proposal including a reduction in the height of the block I tower from 18 to 14-storeys, increased affordable housing, and a reduction in building heights next to Burgess Park. Further changes have been made following the submission of the planning application and the block I tower would now be 12-storeys.

Other matters

315. A Structural Feasibility Report has been submitted in support of the application which considers the way in which the development would be constructed. Officers note that detailed construction matters are dealt with under the Building Regulations.

Conclusion on planning issues

316. The proposal would bring about the regeneration and beneficial re-use of an aging industrial estate, most of which is currently vacant and some of which has been vacant for more than a decade. Whilst it would result in an overall reduction in employment floorspace, the refurbished and redeveloped space would be of a much higher quality, able to attract a wider range of occupiers and support higher employment density. It has the potential to deliver 255 jobs within the completed development, and the applicant is in negotiations with specialist workspace providers to manage affordable workspace which would be provided on the site. It has been demonstrated that a higher amount of commercial floorspace within the development would significantly affect viability, and would affect the amount of affordable housing which could be provided. Given the location of the site, away from a town centre or transport node and given the residential character of the wider area, this is considered to be

acceptable. The development also includes an element of retail space which would serve new and existing local residents and help to attract people to the site.

317. There is a pressing need for housing in the borough and the scheme would deliver 499 new homes, including a policy compliant amount of family housing and 173 affordable housing units; this would equate to 35% affordable housing by habitable room, with a policy compliant tenure split of social rented and intermediate accommodation.
318. The inclusion of housing, retail and community uses on the site is a departure from saved Southwark Plan policy 1.2 relating to preferred industrial areas. This must be weighed against the wider benefits of the scheme, and with regard to the emerging policy within the draft NSP which proposes a change from an industrial use at the site to a mixed-use employment and residential neighbourhood. It is not considered that approval of this application would undermine the future of the PIL, or the emergence of policies within the draft NSP.
319. The design would be of a high quality, reflecting the industrial heritage of the area and retaining an existing brick chimney stack which would act as a focus for the new routes across the site. The proposed new routes would be high quality and predominantly for pedestrians, and would introduce permeability across the site with the potential to connect to Southampton Way and Burgess Park in the future if required. Whilst there would be some harm to the setting of the listed former Church of St George, this is considered to be less than substantial harm which would be outweighed by the wider benefits of the proposal. These benefits need to be weighed against the localised adverse impacts including an equality issue relating to the loss of the car wash, impacts during construction, and impacts upon daylight and sunlight to neighbouring properties. The impact upon four units at the rear of 47 Southampton Way are noted together with impacts upon windows in the side elevation of 13 Parkhouse Street, although there would be some benefit to their outlook due to the removal of the poor quality existing structures. In light of the wider public benefits of the scheme it is considered that on balance, these benefits would outweigh harm to local amenity.
320. Officers have assessed the conclusions of the submitted Environmental Statement, and a number of conditions have been included in the draft recommendation to secure appropriate mitigation. Subject to a s106 agreement and conditions, it is recommended that planning permission be granted following referral to the Mayor of London and the Secretary of State.

Community impact statement

321. In line with the Council's Community Impact Statement the impact of this application has been assessed as part of the application process with regard to local people in respect of their age, disability, faith/religion, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process.
- a) The impact on local people is set out above.
- b) The following issues relevant to particular communities/groups likely to be affected by the proposal have been identified above

c) The likely adverse or less good implications for any particular communities/groups have been also been discussed above.

Consultations

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

Consultation replies

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

Summary of consultation responses

324. **Flood and Drainage Team** - Conditions for a flood evacuation plan, Basement Impact Assessment and detailed drainage strategy are required. Flood adaptation, resistance and resilience measures should be identified and implemented.

325. **Subsequent response** – Conditions recommended. Would meet greenfield run-off rates.

326. **Environmental Protection Team** - Approval with conditions. EPT has reviewed the air quality assessment contained within the Environmental.

327. Statement and concur that the Proposed Development will not cause any exceedances of the air quality objectives and that no mitigation measures are required for the Proposed Development.

328. Ecology Officer

- Surveys acceptable and no further surveys required.
- The proposal should offer a biodiversity gain which complements Burgess Park.
- Confirmation of the boundary with Burgess Park is required;
- Brown roofs should be provided under all of the PVs.
- Conditions required to deal with Japanese Knotweed, to secure bat boxes and bird bricks, and to ensure that the lighting would not cause any harm to bats.

329. Local Economy Team

- No information in the submission about the displacement of existing businesses.
- A loss of B class floorspace contribution is required.
- Jobs targets provided.
- Require a business units management plan and affordable workspace.

Parks and Open Spaces Team

330. Object to the application as follows:

- A 1.5m high fence and native hedge (on the park side) next to blocks A and B would not be acceptable. Recommend a 2.5m high fence. No hedge should be planted on the park side owing to maintenance issues. As this part of the Park is being developed into a Nature reserve area, vehicular access for the developers would not be easily

accessible.

Highways Development Management

331. Approval subject to s278 agreement to secure a range of highway improvements, plus minor modifications to the plans.

Greater London Authority

332. Land use principles: The site is a Locally Significant Industrial Site (LSIS). The scale of industrial floorspace loss is contrary to London Plan Policy 4.4, draft London Plan Policies E4, E6, the adopted local plan and the emerging local plan site allocation. The scale of loss is unacceptable and the reprovision of industrial floorspace (B1c/B2/B8) must be increased.
333. Affordable housing: The scheme proposes 35% affordable housing (by habitable room). The provision falls below the 50% threshold for LSIS set out within Policy H6 of the draft London Plan, and a late stage review mechanism should be secured, alongside the early review. The viability is currently being examined to ensure the offer is the maximum reasonable amount.
334. Urban design: The site layout is supported. There are residential quality issues which should be addressed, particularly the relationship between Blocks I and H. A management plan should be secured for this high density development. Verified views are required to assess the proposal's impact upon London Panorama 1A.2.
335. **Officer response** – the viewing plane is set at 52.1m AOD. The tallest building on the site would be 41.95m AOD and as such would sit well below the viewing plane.
336. **Transport:** TfL will be seeking proportionate contributions towards buses, cycle hire scheme and Legible London signage.
337. **Transport for London (TfL)**
- Support car-free development; future residents should be prevented from obtaining parking permits;
 - Accessible parking would comply with the draft London Plan (2017) but a plan showing up to 10% provision should be provided which could be on-street;
 - Parking should not be for specific units, but allocated on a flexible basis with no long term leasing and not be available to non Blue Badge holders;
 - Unclear if there would be bus capacity issues, due to changes linked to the Old Kent Road Opportunity Area and mitigation already secured through other developments. Contribution of £90k required if there is overcrowding within the first two years of occupation or occupation of 300 homes (whichever is sooner).
 - Contribution of £150k required towards a new cycle hire docking station
 - A detailed breakdown of the proposed long and short stay cycle parking is required based on the draft 2017 London Plan;
 - A range of cycle parking options should be provided;
 - No vehicle through-route across the public realm within the site should be permitted, but they should be accessible to cyclists and pedestrians 24/7;
 - New / updated wayfinding and signage should be provided;
 - Footways along Parkhouse Street and Cottage Green should be improved;
 - Contribution of £15k required for signage at the site boundary and to update existing

signage at other key locations;

- Servicing strategy appears acceptable;
- Should consider changes to the junctions from Parkhouse Street and Wells Way;
- Different paving within the site could make the development appear inward facing;
- Blank wall on Wells Way which would reduce the amount of useable footway.
- Plans omit bus shelter on Wells Way and show residential entrance and bin store instead which should be moved.
- Building at junction with Parkhouse Street could lead to a narrow and cluttered footway (2m minimum is required);
- Should consider better crossing facility on Wells Way, funded by the developer;
- Residential deliveries would be accepted by a concierge and this should include the affordable units;
- Measures to reduce servicing trips through a servicing and delivery management plan should be secured;
- A detailed construction management plan should be secured;
- Details of how the whole development would be managed once constructed should be provided;
- Travel plan should be improved and cycling target increased.
- The proposal requires a Mayoral CIL payment.

338. **Subsequent response** (additional comments)

- Draft London Plan cycle parking requirements not met;
- Further justification for cycle hire docking station provided.

339. **Thames Water** - No objections regarding sewerage infrastructure capacity. conditions and informatives recommended.

340. **London Fire and Emergency Planning Authority** - An undertaking should be given that access for fire appliances as required by Part B5 of the current Building Regulations Approved Document B and adequate water supplies for fire fighting purposes, will be provided.

341. **Officer response** - the applicant has confirmed that access for fire appliances would be provided, and that a fire engineer has reviewed the proposal.

342. **London Underground** - No comments.

343. **Environment Agency** - No objections to the application, provided conditions regarding contamination. The 'exception test' must be undertaken with regard to Flood Risk. There may be other sources of flooding, including from surface water which the Local Authority can advise on.

344. **Metropolitan Police** - Compartmentalisation will be required as more than 25 units would be served off each core. The development should be able to achieve Secure by Design certification.

345. **Natural England** - no objection. The proposal is unlikely to affect any statutorily protected sites or landscapes. The proposal has not been assessed for impacts upon protected species.

346. **Historic England** - This application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.

347. **Friends of Burgess Park** - Object to the proposal on the following grounds:

- Heritage and visual impact upon Burgess Park and the character of the local area;
- Cumulative impact of flats along park boundaries not considered;
- Support a 4.8m buffer with the park but a hedge and tall trees would be required along the boundary to support biodiversity;
- Impact of lighting on bats must be dealt with by condition;
- Block A poorly designed;
- Support new housing and / or industry that is low level and supports the location next to the park;
- Lack of playspace;
- Increased pressure on the park;
- Lack of green space within the development.

Additional response following re-consultation:

348. Continue to object for the same reasons, together with concerns regarding overshadowing of the park, existing Victorian factories and warehouses would not be retained, an additional building would be visible from the park, concerns raised by TfL which should be addressed, single-aspect flats, potential overheating. Note the retention of the existing warehouse (block B) as positive and welcome increased family housing.

Camberwell Fields Residents' Association

349. Object to the application on the grounds that many of the proposed buildings would be too high. Anything in excess of 5-stoerys would be out of keeping with the surrounding area and could cause overshadowing and loss of light

Wells Way Triangle Residents' Association

350. Object to the application on the following grounds:

- Would fundamentally change character and townscape of the area, close to Burgess Park which is a Site of Importance for Nature Conservation;
- Likely to be higher levels of noise than predicted in the ES;
- Inadequate air quality monitoring;
- Overshadowing and loss of light;
- Density threshold exceeded;
- Mix of dwellings policy not complied with;
- Lack of outdoor amenity space to block A;
- Block A too close to existing Parkhouse Street terrace;
- Block A is backland development and proposal does not comply with Residential Design Standards SPD as it would not be single-storey;
- Lack of parking;
- Loss of industrial / commercial space;
- Proposed residential accommodation affected by the Babcock Depot and scaffold yard;
- Some residential units undersized and poor layouts.

Additional response following re-consultation

351. Object to revised plans due to:

- The height, mass and bulk of the buildings. Although tower reduced, other buildings increased in height to compensate;
- Site not suitable for tall buildings;
- Council pre-application advice advised that 7-storeys would be the most which would be supported;
- Lack of respect for the character of the area which is low rise;
- Disagree with ES conclusions regarding views and townscape impacts;
- Overshadowing of existing residential properties and Burgess Park;
- Amendments to proposal increase the number of properties which would experience a major effect on NSL;
- Excessive density which has increased in the amended proposal from 1, 396 to 1,604.
- Impact on local services and amenities, in particular our local bus services
- Cumulative impact of this and other developments. Council has not engaged with the community on proposals at 21-23 Parkhouse Street and 35-39 Parkhouse Street.

352. **Officer response** – a planning application at 21-23 has been withdrawn but was subject to public consultation. 35-39 is a pre-application enquiry which is treated as confidential until / unless an application for the site has been submitted.

353. Not opposed in principle to redevelopment of the site, and but any development should be much smaller in scale so that it respects the existing character of the area

354. **Camberwell Association** - object to the application.

- Site had the potential to create a vibrant hub but maximising floorspace put before other considerations;
- Over-scale buildings with random spaces between them;
- No clear community function;
- Existing houses dwarfed by the proposal;
- Overdevelopment and lack of attention to civic realm.

355. **Southwark Green Party**

- Revised plans unacceptable;
- Lack of genuinely affordable housing;
- Density of proposal largely unchanged;
- Would dwarf existing houses;
- Harm to neighbouring heritage assets;
- Impact on public transport;
- Impact on facilities such as GPs and schools;
- Increased flood risk;
- Removal of a cycle lane;
- Lack of childrens' playspace;
- Proximity to and impact upon Burgess Park;
- Impact on a protected tree;

-Not opposed to the principle of redevelopment the site but plans must be scaled back.

Initial consultation

356. Representations have been received from 70 properties objecting to the application on the following grounds.

357. **Land use**

- Loss of commercial floorspace contrary to planning policy;
- Question the demand for the retail spaces which could remain empty;
- Question where previous small businesses have relocated to;
- Question whether the proposed flats would sell;
- Question whether artist units would be occupied and securing them as affordable is an inappropriate use of s106;
- Support the principle of regenerating the area but object to the scale of the proposed development;
- The proposal should include a new community hall;
- Loss of artist studios;
- Transient population if the properties are rented out;
- Cafes and restaurants would be out of character with the area;
- After a 5 year period of affordable rent local businesses would be priced out;
- Should include affordable space for artists.

358. **Affordable housing**

- Insufficient affordable housing;
- Viability assessment shows 35% is not viable so unlikely affordable housing would be delivered;
- Will reduce the availability of council and affordable homes in the area as the homes would be out of the price range of the local community;

359. **Design**

- Harmful to local character, townscape, brick chimney and Burgess Park;
- No policy justification for tall building in this location as not high PTAL area, close to public transport or in the central activities zone;
- Draft NSP not yet adopted;
- Impact upon Parkhouse Street Victorian terrace has not been considered in the townscape analysis and analysis understates impacts;
- Impact upon neighbouring listed buildings and conservation area;
- Sets the wrong precedent for future development;
- Block C should be reduced in height and set back from the street;
- The proposal is not plan-led;
- Lack of green space within the development;
- Block A would be backland development and should be low in scale;
- Wireline drawings showing building heights are misleading.

360. **Density** - The proposal would exceed the density threshold given in the Council's policies. The site is not in an opportunity area or action area core therefore there is no justification for exceeding the policy density range;

361. **Mix of dwellings** - Proposed unit mix contrary to policy.

362. Quality of accommodation

- Insufficient amenity space including playspace;
- Overdevelopment with insufficient natural light or privacy for the proposed occupiers;
- Some units undersized;
- Block A properties have bedrooms and bathrooms accessed off living spaces;
- The noise monitoring locations did not include a location next to the Babcock depot on Parkhouse Street which operates 24/7 and does not adequately pick up traffic noise;
- Noise levels to balconies next to the scaffold yard would be excessive;

363. Amenity

- Loss of daylight, sunlight and overshadowing;
- Loss of privacy;
- Sense of enclosure / loss of outlook;
- Increased noise and disturbance from the development;
- Light and pollution;
- No air quality measurements were taken from Parkhouse Street;
- Increased air pollution;
- Impact of construction work;
- Loss of property value, impact on views and damage to property – officer response – these are not a material planning considerations;
- Block A would be backland development and would not comply with the SPD guidance;
- Impact on services such as community facilities, education and health care;
- Creation of wind tunnels;
- Tall buildings can lead to poor mental health;

364. Transport

- Would attract visitors but no visitor parking is proposed;
- Lack of parking would lead to conflict;
- Question why only accessible parking is proposed;
- Should be car-free except for accessible parking;
- Occupants should be prevented from obtaining parking permits in the surrounding CPZ;
- Impact on busses;
- Traffic generation which cannot be accommodated on local roads;
- TA based on out of date information from 2011 census;
- Provision of parking contrary to climate change / pollution objectives;
- Unclear whether fire engines could access block A;
- Different PTALs given in the submission;
- Proposal would remove a cycle lane on Wells Way;
- No guarantee that the development would be car-free as other developments have failed to comply with this requirement;
- Walking distances to local stations are longer than stated;
- Existing parking restrictions along Wells Way are disregarded during local church services;
- Lack of cycle parking;
- Impact upon highway safety;
- Disturbance / disruption if secondary access to block A from Southampton Way is used by people accessing the main part of the site.

365. Flood risk - Concerned about long term viability of the development in a flood risk zone. Surface water management strategy is inadequate as Wells Way is prone to

flooding and inadequate sewerage capacity.

366. **Sustainability** - Plans do not contain provision for solar energy or photovoltaic panels, contrary to the New Southwark Plan.
367. **Ecology** - Would adjoin the New Church Road wildlife site and would adversely affect biodiversity. The proposal would threaten a protected tree at 43 Parkhouse Street (TPO 86B). The proposal would overshadow the park, impacting upon wildlife.
368. Other matters - Lack of consultation with residents.
369. 3 representations have been received in support of the application for the following reasons:
- Site used for artist studios on a short term basis as a meanwhile use, but on the basis that would find future solutions within the development for purpose built artist studios;
 - The proposal includes 3,375sqm (GIA) of B1 commercial floorspace;
 - The proposed development looks excellent;
 - Site has been dilapidated with large empty areas for many years;
 - Provision of new homes;
 - Improved quality business space;
 - New homes and businesses would bring economic and social benefits;
 - Support the proposal, except for the block A houses.

Comments

370. 2 general comments have been received as follows:
- Adequate refuse storage must be provided;
 - Support proposal but density, height and massing must be reduced and concerns the commercial units would remain empty or attract low quality retail uses;
 - Concerns regarding impact upon former Listed church;
 - Support the provision of new housing;
 - Should reduce car parking on the site to allow for more public realm and space next to Burgess Park;
 - Would be opposed to the development unless public transport is improved.

Re-consultation

371. Objections have been received from 84 properties raising the following additional issues:
- Revised plans do not address previous concerns;
 - Revised plans worse than original plans as some buildings have been reduced but some have got higher;
 - Contrary to NSP 23 which may need revising if replacement floorspace requires an excessive number of residential units to be viable;
 - Buildings too close together;
 - Lack of walking space within the development;
 - Featureless design;
 - Proximity to Burgess Park;
 - Roof level wind turbines should be incorporated;

- Proposal would not help with youth crime, loneliness, obesity, depression or homelessness;
- Need more spaces for children and youth, green spaces, allotments, community cafes and art spaces;
- Should be an east/west cycle route through the development;
- Block A houses would be closer to Burgess Park;
- One word submissions objecting to or supporting the application should be give less weight than detailed responses;
- Daylight / sunlight impacts would be worsened in some instances;
- Lack of daylight and outdoor space to commercial spaces and floor to ceiling heights reduced;
- Parkhouse Street should be made a cul-de-sac;
- Question the tax practices and potential other practices of the developer (officer response – this is not a material planning consideration)
- Site could be used for Air BnB purposes (officer response – in London Air BnB can only operate for 90 days in one calendar year);
- Too many planning documents for residents to review;
- Are already breweries in the area;
- Should not be building towers following the Grenfell tragedy.

372. Supports have been received from 47 properties on the following grounds:

- Good form of development;
- Support much needed additional housing;
- Would replace a low density business park which is an eyesore in a residential area;
- Unfortunate that the tower was reduced in height which reduced the number of homes which could be provided;
- High quality refuse storage is required.

373. General comment have been received from 2 properties:

- Insufficient space to provide the 5 houses behind the existing Parkhouse Street terrace without impacting upon light and privacy;
- Should be 21m to the back of the existing properties;
- Still too high;
- Impact of significant number of new residents not fully thought through.

Human rights implications

374. 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.

375. This application has the legitimate aim of providing a comprehensive redevelopment of the site. 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/2236-2 Application file: 17/AP/4797 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: Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Daylight and Sunlight Tables
Appendix 4	Pre-Application Letter
Appendix 5	Recommendation

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Victoria Lewis, Team Leader	
Version	Final	
Dated	12 November 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	16 November 2018	

APPENDIX 1

Consultation undertaken

Site notice date: 01/02/2018, 13/02/2018, 23/08/2018, 28/09/2018.

Press notice date: 01/02/2018, 23/08/2018, 27/09/2018.

Case officer site visit date: Various.

Neighbour consultation letters sent: 02/02/2018, 13/02/2018, 23/08/2018, 28/09/2018.

Internal services consulted:

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

Statutory and non-statutory organisations consulted:

EDF Energy
 Environment Agency
 Greater London Authority
 Historic England
 London Fire & Emergency Planning Authority
 London Underground Limited
 Metropolitan Police Service (Designing out Crime)
 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:

91 Southampton Way London SE5 7SX
 89 Southampton Way London SE5 7SX
 93 Southampton Way London SE5 7SX
 The Flying Dutchman 156 Wells Way SE5 7SY
 99 Southampton Way London SE5 7SX
 95 Southampton Way London SE5 7SX
 105 Southampton Way London SE5 7SX
 101 Southampton Way London SE5 7SX
 107 Southampton Way London SE5 7SX
 85 Southampton Way London SE5 7SX

6 Southampton Way London SE5 7SS
 56 Southampton Way London SE5 7TT
 54 Southampton Way London SE5 7TT
 75 Edmund Street London SE5 7NF
 Flat 9 8 Benhill Road SE5 7PU
 Flat 8 8 Benhill Road SE5 7PU
 77 Edmund Street London SE5 7NF
 83 Edmund Street London SE5 7NF
 81 Edmund Street London SE5 7NF
 79 Edmund Street London SE5 7NF

113 Southampton Way London SE5 7SX
 101 Wells Way London SE5 7SZ
 125 Wells Way London SE5 7SZ
 123 Wells Way London SE5 7SZ
 121 Wells Way London SE5 7SZ
 127 Wells Way London SE5 7SZ
 131 Wells Way London SE5 7SZ
 129 Wells Way London SE5 7SZ
 107 Wells Way London SE5 7SZ
 105 Wells Way London SE5 7SZ
 103 Wells Way London SE5 7SZ
 111 Wells Way London SE5 7SZ
 119 Wells Way London SE5 7SZ
 117 Wells Way London SE5 7SZ
 Flat 1 113 Wells Way SE5 7SZ
 149 Southampton Way London SE5 7EW
 147 Southampton Way London SE5 7EW
 145 Southampton Way London SE5 7EW
 17 Southampton Way London SE5 7SW
 13 Southampton Way London SE5 7SW
 127 Southampton Way London SE5 7EW
 117 Southampton Way London SE5 7SW
 153 Southampton Way London SE5 7EJ
 129 Southampton Way London SE5 7EW
 143 Southampton Way London SE5 7EW
 141 Southampton Way London SE5 7EW
 139 Southampton Way London SE5 7EW
 21 Southampton Way London SE5 7SW
 41 Southampton Way London SE5 7SW
 37 Southampton Way London SE5 7SW
 47 Southampton Way London SE5 7SW
 27 Southampton Way London SE5 7SW
 29 Southampton Way London SE5 7SW
 35 Southampton Way London SE5 7SW
 31 Southampton Way London SE5 7SW
 135 Wells Way London SE5 7SZ
 45 Rainbow Street London SE5 7TB
 43 Rainbow Street London SE5 7TB
 41 Rainbow Street London SE5 7TB
 47 Rainbow Street London SE5 7TB
 51 Rainbow Street London SE5 7TB
 5 Rainbow Street London SE5 7TB
 49 Rainbow Street London SE5 7TB
 27 Rainbow Street London SE5 7TB
 25 Rainbow Street London SE5 7TB
 23 Rainbow Street London SE5 7TB
 29 Rainbow Street London SE5 7TB
 37 Rainbow Street London SE5 7TB
 33 Rainbow Street London SE5 7TB
 3 Rainbow Street London SE5 7TB
 53 Rainbow Street London SE5 7TB
 22 Rainbow Street London SE5 7TD
 20 Rainbow Street London SE5 7TD
 2 Rainbow Street London SE5 7TD
 24 Rainbow Street London SE5 7TD
 30 Rainbow Street London SE5 7TD
 28 Rainbow Street London SE5 7TD
 26 Rainbow Street London SE5 7TD
 10 Rainbow Street London SE5 7TD
 9 Rainbow Street London SE5 7TB
 7 Rainbow Street London SE5 7TB
 12 Rainbow Street London SE5 7TD
 18 Rainbow Street London SE5 7TD
 16 Rainbow Street London SE5 7TD
 14 Rainbow Street London SE5 7TD
 10 Dowlas Street London SE5 7TA
 1 Dowlas Street London SE5 7TA
 99 Wells Way London SE5 7SZ
 12 Dowlas Street London SE5 7TA
 15 Dowlas Street London SE5 7TA
 14 Dowlas Street London SE5 7TA
 13 Dowlas Street London SE5 7TA
 141 Wells Way London SE5 7SZ
 62 Southampton Way London SE5 7TT
 Flat 65 64 St Georges Way SE15 6QW
 Flat 64 64 St Georges Way SE15 6QW
 Flat 63 64 St Georges Way SE15 6QW
 Flat 66 64 St Georges Way SE15 6QW
 82 Tower Mill Road London SE15 6BP
 Flat 70 64 St Georges Way SE15 6QW
 Flat 68 64 St Georges Way SE15 6QW
 92 Southampton Way London SE5 7TT
 74 Southampton Way London SE5 7TT
 64 Southampton Way London SE5 7TT
 Flat 58 64 St Georges Way SE15 6QW
 Flat 61 64 St Georges Way SE15 6QW
 Flat 60 64 St Georges Way SE15 6QW
 Flat 59 64 St Georges Way SE15 6QW
 26 Benhill Road London SE5 7PT
 10 Chiswell Street London SE5 7PX
 12 Chiswell Street London SE5 7PX
 Flat 2 56 Coleman Road SE5 7TG
 13 Durfey Place London SE5 7QD
 3 Donato Drive London SE15 6BF
 8 Durfey Place London SE5 7QD
 12 Durfey Place London SE5 7QD
 Flat 9 87 Edmund Street SE5 7NH
 Flat 8 87 Edmund Street SE5 7NH
 Flat 7 87 Edmund Street SE5 7NH
 Flat 4 63 Wells Way SE5 7GB
 Flat 1 56 Coleman Road SE5 7TG
 Flat 13 59 Wells Way SE5 7UB
 Flat 8 63 Wells Way SE5 7GB
 7 Donato Drive London SE15 6BF
 19 Chiswell Street London SE5 7PZ
 17 Chiswell Street London SE5 7PZ
 56a Coleman Road London SE5 7TG
 14 Chiswell Street London SE5 7PX
 1 Donato Drive London SE15 6BF
 5 Donato Drive London SE15 6BF
 16 Chiswell Street London SE5 7PX
 11 Durfey Place London SE5 7QD
 10 Durfey Place London SE5 7QD
 9 Durfey Place London SE5 7QD
 Flat 33 60 St Georges Way SE15 6QR
 Flat 32 60 St Georges Way SE15 6QR
 Flat 31 60 St Georges Way SE15 6QR
 Flat 34 60 St Georges Way SE15 6QR
 Flat 42 62 St Georges Way SE15 6QS
 Flat 37 62 St Georges Way SE15 6QS
 Flat 36 62 St Georges Way SE15 6QS
 Flat 16 60 St Georges Way SE15 6QR
 Flat 6 56 Coleman Road SE5 7TG
 Flat 4 56 Coleman Road SE5 7TG
 Flat 17 60 St Georges Way SE15 6QR
 Flat 27 60 St Georges Way SE15 6QR
 Flat 23 60 St Georges Way SE15 6QR
 Flat 20 60 St Georges Way SE15 6QR
 Flat 3 59 Wells Way SE5 7UB
 Flat 2 87 Edmund Street SE5 7NH
 Flat 1 87 Edmund Street SE5 7NH
 Flat 3 87 Edmund Street SE5 7NH
 Flat 6 87 Edmund Street SE5 7NH
 Flat 5 87 Edmund Street SE5 7NH
 Flat 4 87 Edmund Street SE5 7NH
 Flat 9 59 Wells Way SE5 7UB
 Flat 6 59 Wells Way SE5 7UB
 Flat 5 59 Wells Way SE5 7UB
 Flat 3 63 Wells Way SE5 7GB
 Flat 9 63 Wells Way SE5 7GB
 Flat 7 63 Wells Way SE5 7GB
 Flat 6 63 Wells Way SE5 7GB
 Flat 7 8 Benhill Road SE5 7PU
 90 Southampton Way London SE5 7TT
 88 Southampton Way London SE5 7TT
 86 Southampton Way London SE5 7TT

139 Wells Way London SE5 7SZ
 137 Wells Way London SE5 7SZ
 143 Wells Way London SE5 7SZ
 97 Wells Way London SE5 7SZ
 147 Wells Way London SE5 7SZ
 145 Wells Way London SE5 7SZ
 16 Dowlas Street London SE5 7TA
 11 Rainbow Street London SE5 7TB
 1 Rainbow Street London SE5 7TB
 8 Dowlas Street London SE5 7TA
 13 Rainbow Street London SE5 7TB
 21 Rainbow Street London SE5 7TB
 15 Rainbow Street London SE5 7TB
 3 Dowlas Street London SE5 7TA
 2 Dowlas Street London SE5 7TA
 17 Dowlas Street London SE5 7TA
 4 Dowlas Street London SE5 7TA
 7 Dowlas Street London SE5 7TA
 6 Dowlas Street London SE5 7TA
 5 Dowlas Street London SE5 7TA
 41 Parkhouse Street London SE5 7TQ
 Flat 18 Leigh Court SE5 7FP
 Flat 17 Leigh Court SE5 7FP
 Flat 16 Leigh Court SE5 7FP
 Flat 19 Leigh Court SE5 7FP
 Flat 22 Leigh Court SE5 7FP
 Flat 21 Leigh Court SE5 7FP
 Flat 20 Leigh Court SE5 7FP
 Flat 11 Leigh Court SE5 7FP
 Flat 10 Leigh Court SE5 7FP
 Flat 9 Leigh Court SE5 7FP
 Flat 12 Leigh Court SE5 7FP
 Flat 15 Leigh Court SE5 7FP
 Flat 14 Leigh Court SE5 7FP
 Flat 13 Leigh Court SE5 7FP
 Flat 23 Leigh Court SE5 7FP
 7 Benhill Road London SE5 7FT
 5 Benhill Road London SE5 7FT
 9 Benhill Road London SE5 7FT
 15 Benhill Road London SE5 7FT
 13 Benhill Road London SE5 7FT
 11 Benhill Road London SE5 7FT
 Ground Floor And Basement 101 Southampton Way SE5 7SX
 The Well Community Church Wells Way SE5 7SY
 Flat 24 Leigh Court SE5 7FP
 1 Benhill Road London SE5 7FT
 Flat Above 101 Southampton Way SE5 7SX
 Flat 27 Hodgkin Court SE5 7FN
 Flat 26 Hodgkin Court SE5 7FN
 Flat 25 Hodgkin Court SE5 7FN
 Flat 28 Hodgkin Court SE5 7FN
 Flat 31 Hodgkin Court SE5 7FN
 Flat 30 Hodgkin Court SE5 7FN
 Flat 29 Hodgkin Court SE5 7FN
 Flat 20 Hodgkin Court SE5 7FN
 Flat 19 Hodgkin Court SE5 7FN
 Flat 18 Hodgkin Court SE5 7FN
 Flat 21 Hodgkin Court SE5 7FN
 Flat 24 Hodgkin Court SE5 7FN
 Flat 23 Hodgkin Court SE5 7FN
 Flat 22 Hodgkin Court SE5 7FN
 Flat 32 Hodgkin Court SE5 7FN
 Flat 4 Leigh Court SE5 7FP
 Flat 3 Leigh Court SE5 7FP
 Flat 2 Leigh Court SE5 7FP
 Flat 5 Leigh Court SE5 7FP
 Flat 8 Leigh Court SE5 7FP
 Flat 7 Leigh Court SE5 7FP
 Flat 6 Leigh Court SE5 7FP
 3 Sam King Walk London SE5 7FP
 2 Sam King Walk London SE5 7FP
 4 Sam King Walk London SE5 7FP
 94 Southampton Way London SE5 7TT
 Flat 2 59 Wells Way SE5 7UB
 96 Southampton Way London SE5 7TT
 52 Southampton Way London SE5 7TT
 50 Southampton Way London SE5 7TT
 48 Southampton Way London SE5 7TT
 78 Southampton Way London SE5 7TT
 84 Southampton Way London SE5 7TT
 82 Southampton Way London SE5 7TT
 80 Southampton Way London SE5 7TT
 Flat 4 59 Wells Way SE5 7UB
 90 Tower Mill Road London SE15 6BP
 Flat 14 59 Wells Way SE5 7UB
 Room 4 75-77 Southampton Way SE5 7SW
 Room 3 75-77 Southampton Way SE5 7SW
 Room 2 75-77 Southampton Way SE5 7SW
 Room 5 75-77 Southampton Way SE5 7SW
 Room 8 75-77 Southampton Way SE5 7SW
 Room 7 75-77 Southampton Way SE5 7SW
 Room 6 75-77 Southampton Way SE5 7SW
 Unit 5 Ground Floor Burgess Industrial Estate SE5 7TQ
 Flat 2 Collingwood House SE5 7ST
 Flat 1 Collingwood House SE5 7ST
 Unit 6 First Floor Burgess Industrial Estate SE5 7TJ
 Room 12 75-77 Southampton Way SE5 7SW
 Room 10 75-77 Southampton Way SE5 7SW
 Room 1 75-77 Southampton Way SE5 7SW
 Room 9 75-77 Southampton Way SE5 7SW
 80 Tower Mill Road London SE15 6BP
 78 Tower Mill Road London SE15 6BP
 76 Tower Mill Road London SE15 6BP
 84 Tower Mill Road London SE15 6BP
 46 Southampton Way London SE5 7TT
 44 Southampton Way London SE5 7TT
 86 Tower Mill Road London SE15 6BP
 10 Comfort Street London SE15 6BT
 8 Comfort Street London SE15 6BT
 129a Southampton Way London SE5 7EW
 12 Comfort Street London SE15 6BT
 74 Tower Mill Road London SE15 6BP
 16 Comfort Street London SE15 6BT
 14 Comfort Street London SE15 6BT
 Flat 69 64 St Georges Way SE15 6QW
 Flat 67 64 St Georges Way SE15 6QW
 Flat 62 64 St Georges Way SE15 6QW
 Flat 1 59 Wells Way SE5 7UB
 Flat 12 59 Wells Way SE5 7UB
 Flat 11 59 Wells Way SE5 7UB
 Flat 10 59 Wells Way SE5 7UB
 Flat 53 62 St Georges Way SE15 6QS
 Flat 52 62 St Georges Way SE15 6QS
 Flat 51 62 St Georges Way SE15 6QS
 Flat 54 62 St Georges Way SE15 6QS
 Flat 57 64 St Georges Way SE15 6QW
 Flat 56 64 St Georges Way SE15 6QW
 Flat 55 62 St Georges Way SE15 6QS
 Flat 15 59 Wells Way SE5 7UB
 6 Benhill Road London SE5 7PT
 12 Benhill Road London SE5 7PT
 Flat 4 73 Wells Way SE5 7GD
 Flat 2 8 Benhill Road SE5 7PU
 Flat 5 8 Benhill Road SE5 7PU
 Flat 4 8 Benhill Road SE5 7PU
 Flat 3 8 Benhill Road SE5 7PU
 Flat 1 63 Wells Way SE5 7GB
 Flat 8 59 Wells Way SE5 7UB
 Flat 7 59 Wells Way SE5 7UB
 Flat 2 63 Wells Way SE5 7GB
 Flat 2 73 Wells Way SE5 7GD
 69 Wells Way London SE5 7GA
 Flat 5 63 Wells Way SE5 7GB
 Flat 22 60 St Georges Way SE15 6QR

Flat 1 Leigh Court SE5 7FP
 6 Sam King Walk London SE5 7FP
 5 Sam King Walk London SE5 7FP
 Flat 6 Dunvill Court SE5 7FT
 Flat 5 Dunvill Court SE5 7FT
 Flat 4 Dunvill Court SE5 7FT
 Flat 7 Dunvill Court SE5 7FT
 Flat 10 Dunvill Court SE5 7FT
 Flat 9 Dunvill Court SE5 7FT
 Flat 8 Dunvill Court SE5 7FT
 Flat 8 Sullivan House SE5 7FT
 Flat 7 Sullivan House SE5 7FT
 Flat 6 Sullivan House SE5 7FT
 Flat 9 Sullivan House SE5 7FT
 Flat 3 Dunvill Court SE5 7FT
 Flat 2 Dunvill Court SE5 7FT
 Flat 1 Dunvill Court SE5 7FT
 Flat 11 Dunvill Court SE5 7FT
 Flat 4 83 Tower Mill Road SE15 6BS
 Flat 3 83 Tower Mill Road SE15 6BS
 Flat 2 83 Tower Mill Road SE15 6BS
 Flat 5 83 Tower Mill Road SE15 6BS
 85 Tower Mill Road London SE15 6BS
 81 Tower Mill Road London SE15 6BS
 Flat 6 83 Tower Mill Road SE15 6BS
 100 Southampton Way London SE5 7EW
 2 Harris Street London SE5 7RZ
 Flat 12 Dunvill Court SE5 7FT
 102 Southampton Way London SE5 7EW
 Flat 1 83 Tower Mill Road SE15 6BS
 6 Cottage Green London SE5 7ST
 1b Rainbow Street London SE5 7TB
 37 Benhill Road London SE5 7FT
 35 Benhill Road London SE5 7FT
 33 Benhill Road London SE5 7FT
 39 Benhill Road London SE5 7FT
 Flat 1 Evison House SE5 7FT
 43 Benhill Road London SE5 7FT
 41 Benhill Road London SE5 7FT
 23 Benhill Road London SE5 7FT
 21 Benhill Road London SE5 7FT
 19 Benhill Road London SE5 7FT
 31 Benhill Road London SE5 7FT
 29 Benhill Road London SE5 7FT
 27 Benhill Road London SE5 7FT
 Flat 2 Evison House SE5 7FT
 Flat 1 Sullivan House SE5 7FT
 Flat 11 Evison House SE5 7FT
 Flat 10 Evison House SE5 7FT
 Flat 2 Sullivan House SE5 7FT
 Flat 5 Sullivan House SE5 7FT
 Flat 4 Sullivan House SE5 7FT
 Flat 3 Sullivan House SE5 7FT
 Flat 5 Evison House SE5 7FT
 Flat 4 Evison House SE5 7FT
 Flat 3 Evison House SE5 7FT
 Flat 6 Evison House SE5 7FT
 Flat 9 Evison House SE5 7FT
 Flat 8 Evison House SE5 7FT
 Flat 7 Evison House SE5 7FT
 32 Rainbow Street London SE5 7TD
 42 Rainbow Street London SE5 7TD
 97 Southampton Way London SE5 7SX
 137 Southampton Way London SE5 7EW
 131 Southampton Way London SE5 7EW
 49-51 Southampton Way London SE5 7SW
 109 Wells Way London SE5 7SZ
 2 Parkhouse Street London SE5 7TQ
 First Floor Flat 3 Claremont Villas SE5 7SS
 First Floor Flat 2 Claremont Villas SE5 7SS
 Lesoco Camberwell Centre Southampton Way SE5 7EW
 First Floor Flat 4 Claremont Villas SE5 7SS
 Unit 9 Burgess Industrial Park SE5 7TJ
 Flat 21 60 St Georges Way SE15 6QR
 Flat 19 60 St Georges Way SE15 6QR
 Flat 24 60 St Georges Way SE15 6QR
 Flat 28 60 St Georges Way SE15 6QR
 Flat 26 60 St Georges Way SE15 6QR
 Flat 25 60 St Georges Way SE15 6QR
 Flat 1 8 Benhill Road SE5 7PU
 14 Benhill Road London SE5 7PT
 10 Benhill Road London SE5 7PT
 Flat 6 8 Benhill Road SE5 7PU
 Flat 18 60 St Georges Way SE15 6QR
 98 Southampton Way London SE5 7TT
 76 Southampton Way London SE5 7TT
 Flat 29 60 St Georges Way SE15 6QR
 Flat 46 62 St Georges Way SE15 6QS
 Flat 45 62 St Georges Way SE15 6QS
 Flat 44 62 St Georges Way SE15 6QS
 Flat 47 62 St Georges Way SE15 6QS
 Flat 50 62 St Georges Way SE15 6QS
 Flat 49 62 St Georges Way SE15 6QS
 Flat 48 62 St Georges Way SE15 6QS
 Flat 38 62 St Georges Way SE15 6QS
 Flat 35 60 St Georges Way SE15 6QR
 Flat 30 60 St Georges Way SE15 6QR
 Flat 39 62 St Georges Way SE15 6QS
 Flat 43 62 St Georges Way SE15 6QS
 Flat 41 62 St Georges Way SE15 6QS
 Flat 40 62 St Georges Way SE15 6QS
 1-3 Southampton Way London SE5 7SW
 Flat 6 Hogan Court SE5 7NF
 Flat 5 Hogan Court SE5 7NF
 Flat 4 Hogan Court SE5 7NF
 Flat 7 Hogan Court SE5 7NF
 Flat 10 Hogan Court SE5 7NF
 Flat 9 Hogan Court SE5 7NF
 Flat 8 Hogan Court SE5 7NF
 71 Edmund Street London SE5 7NF
 69 Edmund Street London SE5 7NF
 67 Edmund Street London SE5 7NF
 73 Edmund Street London SE5 7NF
 Flat 3 Hogan Court SE5 7NF
 Flat 2 Hogan Court SE5 7NF
 Flat 1 Hogan Court SE5 7NF
 Flat 11 Hogan Court SE5 7NF
 Flat 21 Hogan Court SE5 7NF
 Flat 20 Hogan Court SE5 7NF
 Flat 19 Hogan Court SE5 7NF
 Flat 22 Hogan Court SE5 7NF
 Flat 25 Hogan Court SE5 7NF
 Flat 24 Hogan Court SE5 7NF
 Flat 23 Hogan Court SE5 7NF
 Flat 14 Hogan Court SE5 7NF
 Flat 13 Hogan Court SE5 7NF
 Flat 12 Hogan Court SE5 7NF
 Flat 15 Hogan Court SE5 7NF
 Flat 18 Hogan Court SE5 7NF
 Flat 17 Hogan Court SE5 7NF
 Flat 16 Hogan Court SE5 7NF
 Flat 10 Ayres Court SE5 7FA
 Flat 9 Ayres Court SE5 7FA
 Flat 8 Ayres Court SE5 7FA
 Flat 11 Ayres Court SE5 7FA
 Flat 14 Ayres Court SE5 7FA
 Flat 13 Ayres Court SE5 7FA
 Flat 12 Ayres Court SE5 7FA
 Flat 3 Ayres Court SE5 7FA
 Flat 2 Ayres Court SE5 7FA
 Flat 1 Ayres Court SE5 7FA
 Flat 4 Ayres Court SE5 7FA
 Flat 7 Ayres Court SE5 7FA
 Flat 6 Ayres Court SE5 7FA
 Flat 5 Ayres Court SE5 7FA
 Flat 15 Ayres Court SE5 7FA

21-23 Parkhouse Street London SE5 7TQ
 9 Dowlas Street London SE5 7TA
 10 Parkhouse Street London SE5 7TQ
 1 Coleman Road London SE5 7TH
 Flat 5 113 Wells Way SE5 7SZ
 Flat 4 113 Wells Way SE5 7SZ
 3 Coleman Road London SE5 7TH
 81 Wells Way London SE5 7TR
 79 Wells Way London SE5 7TR
 77 Wells Way London SE5 7TR
 66 Wells Way London SE5 7UA
 43 Parkhouse Street London SE5 7TQ
 119 Southampton Way London SE5 7EW
 Flat 3 113 Wells Way SE5 7SZ
 Flat 2 113 Wells Way SE5 7SZ
 25-33 Parkhouse Street London SE5 7TQ
 12 Parkhouse Street London SE5 7TQ
 Ground Floor 39 Rainbow Street SE5 7TB
 35a-35b Southampton Way London SE5 7SW
 Ground Floor Flat 5 Claremont Villas SE5 7SS
 Ground Floor Flat 4 Claremont Villas SE5 7SS
 Ground Floor Flat 1 Claremont Villas SE5 7SS
 First Floor Flat 1 Claremont Villas SE5 7SS
 109-111 Southampton Way London SE5 7SX
 75-77 Southampton Way London SE5 7SW
 53-65 Southampton Way London SE5 7SW
 Unit 7 Burgess Industrial Park SE5 7TJ
 17 Rainbow Street London SE5 7TB
 First Floor 39 Rainbow Street SE5 7TB
 5-7 Cottage Green London SE5 7ST
 First Floor Flat 5 Claremont Villas SE5 7SS
 146-154 Wells Way London SE5 7SY
 69 Southampton Way London SE5 7SW
 Flat 8 133-135 Southampton Way SE5 7EW
 54a Coleman Road London SE5 7TG
 Unit 1 Burgess Industrial Park SE5 7TJ
 St Georges C Of E Primary School Coleman Road SE5 7TF
 Flat 3 133-135 Southampton Way SE5 7EW
 Flat 2 133-135 Southampton Way SE5 7EW
 Flat 1 133-135 Southampton Way SE5 7EW
 Flat 4 133-135 Southampton Way SE5 7EW
 Flat 7 133-135 Southampton Way SE5 7EW
 Flat 6 133-135 Southampton Way SE5 7EW
 Flat 5 133-135 Southampton Way SE5 7EW
 83 Wells Way London SE5 7TR
 Rear Of 35-39 Parkhouse Street SE5 7TQ
 Unit 4 First Floor Burgess Industrial Estate SE5 7TQ
 9-11 Southampton Way London SE5 7SW
 133-135 Southampton Way London SE5 7EW
 5-7 Southampton Way London SE5 7SW
 1 Cottage Green London SE5 7ST
 Rear Of 58 Coleman Road SE5 7TG
 Flat 3 Collingwood House SE5 7ST
 Part Ground Floor 9-11 Cottage Green SE5 7ST
 Unit 2 Burgess Industrial Estate SE5 7TQ
 Unit 9 2-10 Parkhouse Street SE5 7TJ
 Unit 6 Ground Floor Burgess Industrial Estate SE5 7TJ
 151 Southampton Way London SE5 7EJ
 33 Harris Street London SE5 7RX
 39c Southampton Way London SE5 7SW
 First Floor Flat 125 Southampton Way SE5 7EW
 First Floor Flat 117 Southampton Way SE5 7EW
 First Floor Flat 79 Southampton Way SE5 7SW
 89 Wells Way London SE5 7TR
 87 Wells Way London SE5 7TR
 85 Wells Way London SE5 7TR
 91 Wells Way London SE5 7TR
 15-19 Parkhouse Street London SE5 7TQ
 95 Wells Way London SE5 7TR
 93 Wells Way London SE5 7TR
 Flat 1 119 Southampton Way SE5 7EW
 Ground Floor Front Flat 3c 79 Southampton Way SE5 7SW
 Flat 24 Ayres Court SE5 7FA
 Flat 23 Ayres Court SE5 7FA
 65 Edmund Street London SE5 7NF
 63 Edmund Street London SE5 7NF
 Flat 18 Ayres Court SE5 7FA
 Flat 17 Ayres Court SE5 7FA
 Flat 16 Ayres Court SE5 7FA
 Flat 19 Ayres Court SE5 7FA
 Flat 22 Ayres Court SE5 7FA
 Flat 21 Ayres Court SE5 7FA
 Flat 20 Ayres Court SE5 7FA
 Flat 26 Hogan Court SE5 7NF
 Flat 11 Barrett Court SE5 7FL
 Flat 10 Barrett Court SE5 7FL
 Flat 9 Barrett Court SE5 7FL
 Flat 12 Barrett Court SE5 7FL
 Flat 1 Hodgkin Court SE5 7FN
 Flat 14 Barrett Court SE5 7FL
 Flat 13 Barrett Court SE5 7FL
 Flat 4 Barrett Court SE5 7FL
 Flat 3 Barrett Court SE5 7FL
 Flat 2 Barrett Court SE5 7FL
 Flat 5 Barrett Court SE5 7FL
 Flat 8 Barrett Court SE5 7FL
 Flat 7 Barrett Court SE5 7FL
 Flat 6 Barrett Court SE5 7FL
 Flat 2 Hodgkin Court SE5 7FN
 Flat 12 Hodgkin Court SE5 7FN
 Flat 11 Hodgkin Court SE5 7FN
 Flat 10 Hodgkin Court SE5 7FN
 Flat 13 Hodgkin Court SE5 7FN
 Flat 16 Hodgkin Court SE5 7FN
 Flat 15 Hodgkin Court SE5 7FN
 Flat 14 Hodgkin Court SE5 7FN
 Flat 5 Hodgkin Court SE5 7FN
 Flat 4 Hodgkin Court SE5 7FN
 Flat 3 Hodgkin Court SE5 7FN
 Flat 6 Hodgkin Court SE5 7FN
 Flat 9 Hodgkin Court SE5 7FN
 Flat 8 Hodgkin Court SE5 7FN
 Flat 7 Hodgkin Court SE5 7FN
 Flat 5 Mori Court SE5 7FJ
 Flat 4 Mori Court SE5 7FJ
 Flat 3 Mori Court SE5 7FJ
 Flat 6 Mori Court SE5 7FJ
 Flat 9 Mori Court SE5 7FJ
 Flat 8 Mori Court SE5 7FJ
 Flat 7 Mori Court SE5 7FJ
 Flat 29 Hogan Court SE5 7NF
 Flat 28 Hogan Court SE5 7NF
 Flat 27 Hogan Court SE5 7NF
 Flat 30 Hogan Court SE5 7NF
 Flat 2 Mori Court SE5 7FJ
 Flat 1 Mori Court SE5 7FJ
 Flat 31 Hogan Court SE5 7NF
 Flat 10 Mori Court SE5 7FJ
 Flat 4 Kitaj Court SE5 7NF
 Flat 3 Kitaj Court SE5 7NF
 Flat 2 Kitaj Court SE5 7NF
 Flat 5 Kitaj Court SE5 7NF
 Flat 1 Barrett Court SE5 7FL
 Flat 13 Mori Court SE5 7FJ
 Flat 12 Mori Court SE5 7FJ
 Flat 11 Mori Court SE5 7FJ
 Flat 14 Mori Court SE5 7FJ
 Flat 1 Kitaj Court SE5 7NF
 Flat 16 Mori Court SE5 7FJ
 Flat 15 Mori Court SE5 7FJ
 Flat 2 14 Coleman Road SE5 7TG
 Flat 7 14 Coleman Road SE5 7TG
 Flat 5 14 Coleman Road SE5 7TG
 First Floor Flat 103 Southampton Way SE5 7SX

Ground Floor Flat 87 Southampton Way SE5 7SW
 Ground Floor Flat 39 Parkhouse Street SE5 7TQ
 Ground Floor Rear Flat 4d 79 Southampton Way SE5 7SW
 Second Floor Flat 125 Southampton Way SE5 7EW
 Second And Third Floor Flat 79 Southampton Way SE5 7SW
 Ground Floor And First Floor Flat 1 Cottage Green SE5 7ST
 Flat 2 45 Southampton Way SE5 7SW
 Flat 2 119 Southampton Way SE5 7EW
 Flat 1 45 Southampton Way SE5 7SW
 Flat 3 45 Southampton Way SE5 7SW
 Ground Floor Flat 19 Rainbow Street SE5 7TB
 Flat B 25 Southampton Way SE5 7SW
 Flat A 25 Southampton Way SE5 7SW
 58 Coleman Road London SE5 7TG
 54 Coleman Road London SE5 7TG
 6 Coleman Road London SE5 7TG
 11 Parkhouse Street London SE5 7TQ
 1 Parkhouse Street London SE5 7TQ
 8 Coleman Road London SE5 7TG
 44 Coleman Road London SE5 7TG
 42 Coleman Road London SE5 7TG
 40 Coleman Road London SE5 7TG
 46 Coleman Road London SE5 7TG
 52 Coleman Road London SE5 7TG
 50 Coleman Road London SE5 7TG
 48 Coleman Road London SE5 7TG
 13 Parkhouse Street London SE5 7TQ
 6 Claremont Villas Southampton Way SE5 7SS
 Ground Floor Flat 3 Claremont Villas SE5 7SS
 Ground Floor Flat 2 Claremont Villas SE5 7SS
 15a Southampton Way London SE5 7SW
 17a Southampton Way London SE5 7SW
 15c Southampton Way London SE5 7SW
 15b Southampton Way London SE5 7SW
 37 Parkhouse Street London SE5 7TQ
 3 Parkhouse Street London SE5 7TQ
 39 Parkhouse Street London SE5 7TQ
 9 Parkhouse Street London SE5 7TQ
 7 Parkhouse Street London SE5 7TQ
 5 Parkhouse Street London SE5 7TQ
 50 Rainbow Street London SE5 7TD
 48 Rainbow Street London SE5 7TD
 6 Rainbow Street London SE5 7TD
 13 Bonsor Street London SE5 7TE
 12 Bonsor Street London SE5 7TE
 8 Rainbow Street London SE5 7TD
 38 Rainbow Street London SE5 7TD
 36 Rainbow Street London SE5 7TD
 34 Rainbow Street London SE5 7TD
 4 Rainbow Street London SE5 7TD
 46 Rainbow Street London SE5 7TD
 44 Rainbow Street London SE5 7TD
 40 Rainbow Street London SE5 7TD
 14 Bonsor Street London SE5 7TE
 24 Coleman Road London SE5 7TG
 22 Coleman Road London SE5 7TG
 20 Coleman Road London SE5 7TG
 26 Coleman Road London SE5 7TG
 4 Coleman Road London SE5 7TG
 30 Coleman Road London SE5 7TG
 28 Coleman Road London SE5 7TG
 17 Bonsor Street London SE5 7TE
 16 Bonsor Street London SE5 7TE
 15 Bonsor Street London SE5 7TE
 10 Coleman Road London SE5 7TG
 2 Coleman Road London SE5 7TG
 St Georges Tavern 14 Coleman Road SE5 7TG
 12 Coleman Road London SE5 7TG
 17b Southampton Way London SE5 7SW
 Flat B 32 Coleman Road SE5 7TG
 Flat B 18 Coleman Road SE5 7TG
 Flat 1 14 Coleman Road SE5 7TG
 Flat 6 14 Coleman Road SE5 7TG
 Flat 8 60 Southampton Way SE5 7TX
 Flat 7 60 Southampton Way SE5 7TX
 Flat 6 60 Southampton Way SE5 7TX
 Flat 1 60 Southampton Way SE5 7TX
 Flat 9 60 Southampton Way SE5 7TX
 Flat 3 60 Southampton Way SE5 7TX
 Flat 12 60 Southampton Way SE5 7TX
 Flat A 133 Wells Way SE5 7SZ
 Flat 1 Windmill Court SE5 7FG
 Ground Floor Rear Flat 4e 79 Southampton Way SE5 7SW
 Flat 3 47 Southampton Way SE5 7SW
 Flat 2 Windmill Court SE5 7FG
 Flat 5 Windmill Court SE5 7FG
 Flat 4 Windmill Court SE5 7FG
 Flat 3 Windmill Court SE5 7FG
 Flat 4 47 Southampton Way SE5 7SW
 Flat 3 56 Coleman Road SE5 7TG
 Flat B 133 Wells Way SE5 7SZ
 Flat 1 2a Cottage Green SE5 7ST
 Flat 2 47 Southampton Way SE5 7SW
 Flat 1 47 Southampton Way SE5 7SW
 Flat 2 2a Cottage Green SE5 7ST
 Flat 4 23 Chiswell Street SE5 7PZ
 Flat 3 23 Chiswell Street SE5 7PZ
 Flat 2 23 Chiswell Street SE5 7PZ
 Flat 5 23 Chiswell Street SE5 7PZ
 Flat 8 23 Chiswell Street SE5 7PZ
 Flat 7 23 Chiswell Street SE5 7PZ
 Flat 6 23 Chiswell Street SE5 7PZ
 21 Chiswell Street London SE5 7PZ
 Flat 10 14 Coleman Road SE5 7TG
 Excluding Part Ground Floor 9-11 Cottage Green SE5 7ST
 25 Chiswell Street London SE5 7PZ
 Flat 1 23 Chiswell Street SE5 7PZ
 28 Benhill Road London SE5 7PT
 8 Cottage Green London SE5 7ST
 Flat 9 23 Chiswell Street SE5 7PZ
 Flat 11 60 Southampton Way SE5 7TX
 Flat 10 60 Southampton Way SE5 7TX
 Flat 1a 60 Southampton Way SE5 7TX
 Flat 5 60 Southampton Way SE5 7TX
 Flat 4 60 Southampton Way SE5 7TX
 Flat 2 60 Southampton Way SE5 7TX
 Flat 11 23 Chiswell Street SE5 7PZ
 Flat 10 23 Chiswell Street SE5 7PZ
 Flat 5 56 Coleman Road SE5 7TG
 18 Chiswell Street London SE5 7PX
 7 Durfey Place London SE5 7QD
 6 Durfey Place London SE5 7QD
 Flat 6 Windmill Court SE5 7FG
 Flat 15 Hambling Court SE5 7TT
 Flat 14 Hambling Court SE5 7TT
 Flat 13 Hambling Court SE5 7TT
 Flat 16 Hambling Court SE5 7TT
 Flat 19 Hambling Court SE5 7TT
 Flat 18 Hambling Court SE5 7TT
 Flat 17 Hambling Court SE5 7TT
 Flat 8 Hambling Court SE5 7TT
 Flat 7 Hambling Court SE5 7TT
 Flat 6 Hambling Court SE5 7TT
 Flat 9 Hambling Court SE5 7TT
 Flat 12 Hambling Court SE5 7TT
 Flat 11 Hambling Court SE5 7TT
 Flat 10 Hambling Court SE5 7TT
 Flat 20 Hambling Court SE5 7TT
 Flat 30 Hambling Court SE5 7TT
 Flat 29 Hambling Court SE5 7TT
 Flat 28 Hambling Court SE5 7TT
 Flat 31 Hambling Court SE5 7TT

Flat B 16 Coleman Road SE5 7TG
 Flat B 36 Coleman Road SE5 7TG
 Flat D 32 Coleman Road SE5 7TG
 Flat C 32 Coleman Road SE5 7TG
 Flat B 38 Coleman Road SE5 7TG
 16a Coleman Road London SE5 7TG
 Flat B 56 Rainbow Street SE5 7TD
 Flat B 54 Rainbow Street SE5 7TD
 Flat A 18 Coleman Road SE5 7TG
 Flat A 38 Coleman Road SE5 7TG
 Flat A 36 Coleman Road SE5 7TG
 Flat A 32 Coleman Road SE5 7TG

1a Parkhouse Street London SE5 7TQ
 Flat 3 Newman House SE5 7TS
 Flat 2 Newman House SE5 7TS
 Flat 1 Newman House SE5 7TS
 Flat 4 Newman House SE5 7TS
 54b Southampton Way London SE5 7TT
 Flat 6 Newman House SE5 7TS
 Flat 5 Newman House SE5 7TS

3a Parkhouse Street London SE5 7TQ

13a Parkhouse Street London SE5 7TQ
 11a Parkhouse Street London SE5 7TQ
 37a Parkhouse Street London SE5 7TQ
 9a Parkhouse Street London SE5 7TQ
 7a Parkhouse Street London SE5 7TQ
 5a Parkhouse Street London SE5 7TQ
 33b Southampton Way London SE5 7SW
 33a Southampton Way London SE5 7SW
 31a Southampton Way London SE5 7SW
 39a Southampton Way London SE5 7SW
 41b Southampton Way London SE5 7SW
 41a Southampton Way London SE5 7SW
 39b Southampton Way London SE5 7SW
 21a Southampton Way London SE5 7SW
 19b Southampton Way London SE5 7SW
 19a Southampton Way London SE5 7SW
 23a Southampton Way London SE5 7SW
 29a Southampton Way London SE5 7SW
 27a Southampton Way London SE5 7SW
 23b Southampton Way London SE5 7SW
 43a Southampton Way London SE5 7SW
 Flat B 35 Rainbow Street SE5 7TB
 Flat B 31 Rainbow Street SE5 7TB
 Flat A 35 Rainbow Street SE5 7TB
 Flat A 52 Rainbow Street SE5 7TD
 Flat B 52 Rainbow Street SE5 7TD
 Flat A 56 Rainbow Street SE5 7TD
 Flat A 54 Rainbow Street SE5 7TD
 115 Wells Way London SE5 7SZ
 87a Southampton Way London SE5 7SX
 43b Southampton Way London SE5 7SW
 11a Dowlas Street London SE5 7TA
 Flat A 31 Rainbow Street SE5 7TB
 Flat A 19 Rainbow Street SE5 7TB
 11b Dowlas Street London SE5 7TA
 Flat 17 Hodgkin Court SE5 7FN
 Flat 5 73 Wells Way SE5 7GD
 Flat 3 73 Wells Way SE5 7GD
 Flat 1 73 Wells Way SE5 7GD
 Flat 6 73 Wells Way SE5 7GD
 75 Wells Way London SE5 7GA
 65 Wells Way London SE5 7GA
 61 Wells Way London SE5 7GA
 88 Tower Mill Road London SE15 6BP
 67 Wells Way London SE5 7GA
 71 Wells Way London SE5 7GA
 70 Wells Way London SE5 7GA
 68 Wells Way London SE5 7GA
 16 Benhill Road London SE5 7PT

Flat 34 Hambling Court SE5 7TT
 Flat 33 Hambling Court SE5 7TT
 Flat 32 Hambling Court SE5 7TT
 Flat 23 Hambling Court SE5 7TT
 Flat 22 Hambling Court SE5 7TT
 Flat 21 Hambling Court SE5 7TT
 Flat 24 Hambling Court SE5 7TT
 Flat 27 Hambling Court SE5 7TT
 Flat 26 Hambling Court SE5 7TT
 Flat 25 Hambling Court SE5 7TT
 Room 11 75-77 Southampton Way SE5 7SW
 Unit Three And Ground Floor Unit Four And First Floor Unit
 Five Burgess Industrial Estate SE5 7TQ
 12 Cottage Green London SE5 7ST
 10 Cottage Green London SE5 7ST
 149a Southampton Way London SE5 7EW
 14a Coleman Road London SE5 7TG
 Flat 8 Windmill Court SE5 7FG
 Flat 7 Windmill Court SE5 7FG
 Living Accommodation 156 Wells Way SE5 7SY
 Maisonette Basement And Ground Floors 73b Southampton
 Way SE5 7SW
 Maisonette First And Second Floors 73a Southampton Way
 SE5 7SW
 Ground Floor 125 Southampton Way SE5 7EW
 14 Cottage Green London SE5 7ST
 Flat 1 Hambling Court SE5 7TT
 16 Durfey Place London SE5 7QD
 Flat 2 Hambling Court SE5 7TT
 Flat 5 Hambling Court SE5 7TT
 Flat 4 Hambling Court SE5 7TT
 Flat 3 Hambling Court SE5 7TT
 Flat 8 To 9 14 Coleman Road SE5 7TG
 Flat 3 To 4 14 Coleman Road SE5 7TG
 15 Durfey Place London SE5 7QD
 14 Durfey Place London SE5 7QD
 2 Cottage Green London SE5 7ST
 Park Office Chumleigh Gardens SE5 0RJ
 204 Camberwell Grove London SE5 8RJ
 Se5 Forum
 Bcm Scaffolding 69 Southampton Way SE5 7SW
 Flat 3 133 Southampton Way SE5 7EW
 7 Parkhouse Street London SE5 7TQ
 Wells Way Camberwell Se5 7sz
 133 A Wells Way London SE5 7SZ
 69 Coleman Road London SE5 7TF
 Flat 11 Leigh Court 1 Sam King Walk SE5 7FP
 133a Wells Way London SE5 7SZ
 14 Addington Square London SE5 7JZ
 47 Southampton Way London SE5 7SW
 3 Tilson Close London SE5 7TZ
 41a Southampton Way London SE5 7SW
 68 Coleman Road London SE5 7TG
 18 Rainbow St London SE5 7TD
 34 Kemerton Road SE5 9AR
 52 Vicarage Grove London SE5 7LP
 58 Colman Road London SE5 7TG
 5 Claremont Villas Southampton Way SE5 7SS
 2 Coleman Road London SE5 7TG
 109 Wells Well Wells Way SE5 7SZ
 14 Barrett Court 1 Dobson Walk SE5 7FL
 9 Palfrey Court 74 Edmund Street SE5 7NR
 109 Wells Way London SE5 7SZ
 Flat 14 Sunset Buildings London SE5 7NR
 38a Coleman Road Camberwell SE5 7TG
 6 Claremont Villas Southampton Way SE5 7SS
 Flat B 32 Coleman Road SE5 7TG
 107 Wells Way London SE5 7SZ
 30 Hambling Court 42 Southampton Way SE5 7TT
 101 Wells Way London SE5 7SZ
 13 Barrett Court 1 Dobson Walk SE5 7FL
 128 Benhill Road London SE5 7LZ
 3a Parkhouse Street London SE5 7TQ

79a Southampton Way London SE5 7SW
79b Southampton Way London SE5 7SW
18 Benhill Road London SE5 7PT
24 Benhill Road London SE5 7PT
22 Benhill Road London SE5 7PT
20 Benhill Road London SE5 7PT
Ground Floor Flat 89 Southampton Way SE5 7SW
67 Southampton Way London SE5 7SW
Unit 10 Burgess Industrial Park SE5 7TJ
Ground Floor Flat 103 Southampton Way SE5 7SX
89 Edmund Street London SE5 7NF
85 Edmund Street London SE5 7NF

117 Coleman Road London SE5 7TF
91 Coleman Road London SE5 7TF
91 Coleman Road London SE5 7TF
13 Parkhouse St London SE5 7TQ
3a Parkhouse Street London SE5 7TQ
Flat 53 Andoversford Court SE15 6AF
13 Leigh Court 1 Sam King Walk SE5 7FP
42 Camberwell Grove London SE5 8RE
Flat 5, Goschen House, 68 Peckham Road SE5 8QE
13 Addington Square London SE5 7JZ
19 Addington Square London SE5 7JZ
Flat 6 Malswick Court Tower Mill Road SE15 6FX

APPENDIX 2**Consultation responses received**

Internal and external consultees - see summary in main report.

Neighbour consultee responses

Bcm Scaffolding 69 Southampton Way SE5 7SW
 Camberwell 4 Brunswick Villas SE5 7RR
 First Floor Flat 4 Claremont Villas SE5 7SS
 First Floor Flat 4 Claremont Villas SE5 7SS
 Flat A 36 Coleman Road SE5 7TG
 Flat A 38 Coleman Road SE5 7TG
 Flat B 32 Coleman Road SE5 7TG
 Flat B 32 Coleman Road SE5 7TG
 Flat 1, 113 Wells Way London SE5 7SZ
 Flat 1 113 Wells Way SE5 7SZ
 Flat 1 56 Coleman Road SE5 7TG
 Flat 1 56 Coleman Road SE5 7TG
 Flat 10 Ayres Court SE5 7FA
 Flat 11 Evison House SE5 7FT
 Flat 11 Leigh Court SE5 7FP
 Flat 11 Leigh Court 1 Sam King Walk SE5 7FP
 Flat 11 Leigh Court 1 Sam King Walk SE5 7FP
 Flat 11 Leigh Court 1 Sam King Walk SE5 7FP
 Flat 14 Sunset Buildings London SE5 7NR
 Flat 2 113 Wells Way SE5 7SZ
 Flat 2 113 Wells Way SE5 7SZ
 Flat 2 113 Wells Way SE5 7SZ
 Flat 2 56 Coleman Road SE5 7TG
 Flat 21 Hodgkin Court SE5 7FN
 Flat 23 Hodgkin Court SE5 7FN
 Flat 23 Leigh Court SE5 7FP
 Flat 24 60 St Georges Way SE15 6QR
 Flat 24 60 St Georges Way SE15 6QR
 Flat 26 Keats House Ellington Estate SE5 7JA
 Flat 28 Hodgkin Court SE5 7FN
 Flat 3 Evison House SE5 7FT
 Flat 3 133 Southampton Way SE5 7EW
 Flat 30 Hambling Court SE5 7TT
 Flat 4 113 Wells Way SE5 7SZ
 Flat 4, 129 Southampton Way London SE5 7EW
 Flat 5, Goschen House, 68 Peckham Road SE5 8QE
 Flat 5 113 Wells Way SE5 7SZ
 Flat 5 113 Wells Way SE5 7SZ
 Flat 53 Andoversford Court SE15 6AF
 Flat 6 Hodgkin Court SE5 7FN
 Flat 6 Malswick Court Tower Mill Road SE15 6FX
 Flat 6 56 Coleman Road SE5 7TG
 Flat 7 Hodgkin Court SE5 7FN
 Flat 9 Evison House SE5 7FT
 Flat 9 59 Wells Way SE5 7UB
 Garnies Close Southwark SE15 6HW
 London House 7 Chapel St TR2 4LD
 Maisonette On Ground And Lower Ground Floors 97 Camberwell Grove SE5 8JH

133 A Wells Way London SE5 7SZ
133 A Wells Way London SE5 7SZ
133a Wells Way London SE5 7SZ
133a Wells Way London SE5 7SZ
14 Addington Square London SE5 7JZ
14 Addington Square London SE5 7JZ
14 Addington Square London SE5 7JZ
14 Barrett Court 1 Dobson Walk SE5 7FL
143 Southampton Way London SE5 7EW
144 Benhill Road Camberwell SE5 7LZ
15 Rowan Court Southwark SE15 6PE
15 Sutherland Square London SE17 3EQ
16 Garnies Close Southwark SE15 6HW
16 Lamb House London SE5 7JF
16 Putney Park Lane London SW15 5HD
16 Rainbow Street London SE5 7TD
16 Rainbow Street London SE5 7TD
16 Rowan Court Southwark SE15 6PE
17 Sturdy Road London SE15 3RH
18 Lamb House London SE5 7JF
18 Rainbow St London SE5 7TD
18 Rainbow St London SE5 7TD
18 Rainbow St London SE5 7TD
18 Rainbow Street London SE5 7TD
18 Rainbow Street London SE5 7TD
18 Rainbow Street London SE5 7TD
185 New Kings Road London SW6 4SW
19 Addington Square London SE5 7JZ
2 Coleman Road London SE5 7TG
2 Coleman Road London SE5 7TG
2 Delft Way London SE22 8TR
2 Horsley Street Walworth SE17 2AU
20 Gately Court London SE15 6FB
20 Keats House London SE5 7JA
20 Marvell House London SE5 7JD
22 Ada Road SE5 7RW
22 Coleman Road London SE5 7TG
23 Gately Court London SE15 6FB
23 Hodgkin Court 2 Dobson Walk SE5 7FN
23b Southampton Way London SE5 7SW
24 Pullens Buildings London SE17 3SJ
249 Underhill Rd London SE22 0PB
25 Rainbow Street London SE5 7TB
26 Landor House London SE5 7JE
27 Rainbow Street London SE5 7TB
29 East Surrey Grove London SE15 6EX
29 Lamb House London SE5 7JF
29 Rainbow Street London SE5 7TB
29 Rainbow Street London SE5 7TB
3 Claremont Villas Southampton Way SE5 7SS
3 Cronin Street London SE15 6JJ
3 Garnies Close Southwark SE15 6HW
3 Parkhouse Street London SE5 7TQ
3 Parkhouse Street London SE5 7TQ
3 Tilson Close London SE5 7TZ
3a Parkhouse Street London SE5 7TQ
3a Parkhouse Street London SE5 7TQ
3a Parkhouse Street London SE5 7TQ

3a Parkhouse Street London SE5 7TQ
3a Parkhouse Street London SE5 7TQ
30 Blackthorne Court Southwark SE15 6PD
30 Coleman Road London SE5 7TG
30 Cronin Street London SE15 6JJ
30 Hambling Court 42 Southampton Way SE5 7TT
30 Rainbow Street London SE5 7TD
31 Keats House London SE5 7JA
31 Pentridge Street Southwark SE1 6JN
31 Pentridge Street Southwark SE15 6JF
31 Portland Street London SE17 2PG
32 Garnies Close Southwark SE15 6HW
33 Hawkslade Rd London SE15 3DQ
33 Rainbow Street London SE5 7TB
33 Rowan Court Southwark SE16 6HI
34 Gateley London SE15 6FB
34 Kemerton Road SE5 9AR
35 Pentridge Street Southwark SE15 6JF
36 Rainbow Street London SE5 7TD
37 Rainbow Street Camberwell SE5 7TB
37 Rainbow Street London SE5 7TB
37 Rainbow Street London SE5 7TB
38 Addington Square London SE5 7LB
38 Rainbow Street London SE5 7TD
38 Rainbow Street London SE5 7TD
38a Coleman Road Camberwell SE5 7TG
39b Southampton Way London SE5 7SW
4 Dowlas Street London SE5 7TA
4 Rowan Court Southwark SE15 6PE
40 Pentridge Street Southwark SE15 6JE
41 East Surrey Grove Southwark SE15 6EB
41 Southampton Way London SE5 7SW
41a Southampton Way London SE5 7SW
41a Southampton Way London SE5 7SW
42 Camberwell Grove London SE5 8RE
42 Camberwell Grove London SE5 8RE
42 Garnies Close Southwark SE15 6HW
42 Southampton Way London SE5 7TT
44 Gateley Court London SE15 6FB
44 Rainbow Street London SE5 7TD
44 Rainbow Street London SE5 7TD
47 Arments Court 392 Albany Road SE5 0DF
47 Arments Court 392 Albany Road SE5 0DF
47 Bellwood Road London SE15 3DE
47 Southampton Way London SE5 7SW
48 East Surrey Grove Peckham SE15 6EB
49 Rowan Court Southwark SE15 6PE
5 Claremont Villas Southampton Way SE5 7SS
5 Lamb House London SE5 7JF
5 Parkhouse Street London SE5 7TQ
5 Parkhouse Street London SE5 7TQ
5 Soane House Roland Way SE17 2JF
5a Parkhouse Street London SE5 7TQ
50 Coleman Rd Camberwell SE5 7TG
50 Coleman Road London SE5 7TG
50 Coleman Road London SE5 7TG
50 Coleman Road London SE5 7TG
50 Coleman Road London SE5 7TG

50 Rainbow Street London SE5 7TD
52 Pentridge Street London SE15 6JE
52 Vicarage Grove London SE5 7LP
54 Pentridge Street London SE15 6JE
56 Culverden Rd London SW12 9LS
56 Southampton Way London SE5 7TT
58 Coleman Road London SE5 7TG
6 Claremont Villas Southampton Way SE5 7SS
6 Claremont Villas Southampton Way SE5 7SS
6 Claremont Villas Southampton Way SE5 7SS
6 Claremont Villas Southampton Way SE5 7SS
6 Claremont Villas Southampton Way SE5 7SS
6 Coleman Road London SE5 7TG
6 Dowlas Street London SE5 7TA
6 Lamb House London SE5 7JF
6 Tilson Close Coleman Road SE5 7TZ
62 Coleman Road London SE5 7TG
65 Wells Way London SE5 7GA
65 Wells Way London SE5 7GA
67a Trinity Church Square London SE1 4HT
68 Coleman Road London SE5 7TG
68 Coleman Road London SE5 7TG
69 Coleman Road London SE5 7TF
69 Coleman Road London SE5 7TF
69 Coleman Road London SE5 7TF
7 Amstel Court Southwark SE15 6LN
7 Parkhouse Street London SE5 7TQ
7a Parkhouse Street London SE5 7TQ
75 Cronin Street London SE15 7JG
78 Coleman Road Camberwell SE5 7TG
79 Coleman Rd London SE5 7TF
79 Coleman Road London SE5 7TF
79 Cronin Street London SE15 6JG
8 Amstel Court Southwark SE15 6LN
8 Omega Gate London SE16 7PR
86 Tower Mill Road London SE15 6BP
9 Palfrey Court 74 Edmund Street SE5 7NR
9 Palfrey Court 74 Edmund Street SE5 7NR
9 Parkhouse Street London SE5 7TQ
9 Parkhouse Street London SE5 7TQ
91 Coleman Road London SE5 7TF
91 Coleman Road London SE5 7TF
95 Southampton Way London SE5 7SX
97 Axminster Road London N7 6BS
97 Wells Way London SE5 7SZ

Appendix 3

Daylight and sunlight tables

Existing baseline V. Proposed Vertical Sky Component and cumulative ()

Property	No of windows	Pass	% of total	Minor effect	Moderate effect	Major effect
1-6 Southampton Way	48	48	100	0	0	0
79 Southampton Way	5	5	100	0	0	0
1 - 12 Southampton Way	17	17	100	0	0	0
47 Southampton Way	27	15	56	0	1	11
33-45 Southampton Way	41	41	100	0	0	0
1 Parkhouse Street	11	9	81	2	0	0
3 Parkhouse Street	12	10	83	0	2	0
5 Parkhouse Street	9	5	56	2	2	0
7 Parkhouse Street	10	5	50	3	2	0
9 Parkhouse Street	9	4	44	0	5	0
11 Parkhouse Street	11	6	55	0	5	0
13 Parkhouse Street	17	7 (6)	41 (35)	1 (2)	5 (6)	4 (3)
77-81 Wells Way	6	6	100	0	0	0
83 Wells Way	2	2 (1)	100 (50)	0 (1)	0	0
85 Wells Way	2	1	50	1	0	0
87 Wells Way	2	1	50	0	1	0
89 Wells Way	2	1	50	0	1	0
91 Wells Way	2	0	0	0 (1)	2 (1)	0
93 Wells Way	2	0	0	0	2	0
95 Wells Way	2	0	0	0	1	1
97 Wells Way	4	0	0	0	0	4
99 Wells Way	3	0	0	0	0	3
101 Wells Way	3	0	0	0	0	3
103 Wells Way	3	0	0	0	2	1
105 Wells Way	3	0	0	0	2	1
107 Wells Way	3	0	0	0	2	1
109 Wells Way	3	0	0	0	2	1
111 Wells Way	3	0	0	0	2	1
113 Wells Way	13	6	46	3	3	1
115 Wells Way	9	8	89	1	0	0
1 - 3 Cottage Green (Collingwood House)	13	13	100	0	0	0
8-14 Cottage Green	13	13	100	0	0	0
Totals	310	223 (221)	72 (71)	13 (16)	42 (42)	32 (31)

Existing baseline V. Proposed No Sky Line and cumulative ()

Property	No of rooms	Pass	% of total	Minor effect	Moderate effect	Major effect
1-6 Southampton Way	24	24	100	0	0	0
79 Southampton Way	5	4	80	0	1	0
1 - 12 Southampton Way	16	15	94	1	0	0
47 Southampton Way	17	7	41	1	1	8
45 Southampton Way	3	1	33	0	2	0
33-43 Southampton Way	35	35	100	0	0	0
1 Parkhouse Street	7	6	86	1	0	0
3 Parkhouse Street	8	7	88	0	1	0
5 Parkhouse Street	7	6	86	0	1	0
7 Parkhouse Street	7	6	86	0	1	0
9 Parkhouse Street	7	6	86	0	1	0
11 Parkhouse Street	8	6	75	0	2	0
13 Parkhouse Street	9	4	44	0 (2)	3 (1)	2
77 Wells Way	2	2	100	0	0	0
79 Wells Way	2	1	50	1	0	0
81 Wells Way	2	0	0	2	0	0
83 Wells Way	2	0	0	1	1	0
85 Wells Way	2	0	0	1	1	0
87 Wells Way	2	0	0	0	1	1
89 Wells Way	2	0	0	0	2	0
91 Wells Way	2	0	0	0	0	2
93 Wells Way	2	0	0	0	0	2
95 Wells Way	2	0	0	0	0	2
97 Wells Way	2	1	50	1	0	0
99 Wells Way	2	0	0	1	0	1
101 Wells Way	2	0	0	0	1	1
103 Wells Way	2	0	0	1	0	1
105 Wells Way	2	1	50	0	0	1
107 Wells Way	2	1	50	0	0	1
109 Wells Way	2	1	50	0	0	1
111 Wells Way	2	1	50	0	0	1
113 Wells Way	8	3	38	2	0	3
115 Wells Way	6	6	100	0	0	0
1 - 3 Cottage Green (Collingwood House)	5	5	100	0	0	0
8-14 Cottage Green	10	10	100	0	0	0
Totals	218	159	73	13 (15)	19 (17)	27

Existing baseline V. Annual Probable Sunlight Hours and cumulative ()

Property	No of rooms	Pass	% of total	Minor effect	Moderate effect	Major effect
6 Southampton Way	1	1	100	0	0	0
47 Southampton Way	1	1	100	0	0	0
43 Southampton Way	5	5	100	0	0	0
1-13 Parkhouse Street	43	43	100	0	0	0
77 Wells Way	2	1	50	1 (0)	0	0
79 Wells Way	2	2	100	0	0	0
81 Wells Way	2	1	50	0 (1)	1 (0)	0
83 Wells Way	2	2	100	0	0	0
85 Wells Way	2	1	50	0	0	1
87 Wells Way	2	2	100	0	0	0
89 Wells Way	2	1	50	0	0	1
91 Wells Way	2	2	100	0	0	0
93 Wells Way	2	1	50	0	0	1
95 Wells Way	2	1	50	0	0	1
97-113 Wells Way	38	38	100	0	0	0
115 Wells Way	9	8	89	0	0	1
1 - 3 Cottage Green (Collingwood House)	2	2	100	0	0	0
Totals	119	112	94	1 (1)	1 (0)	5

RECOMMENDATION LDD MONITORING FORM REQUIRED

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	Peachtree Services Ltd	Reg. Number	17/AP/4797
Application Type	Full Planning Application	Case Number	TP/2236-2
Recommendation	Grant subject to Legal Agrt, GLA and SoS		

Draft of Decision Notice

Planning Permission was **GRANTED** for the following development:

Demolition of the existing buildings and redevelopment of the site to provide 499 residential units, up to 3,725sqm (GIA) of Class B1 commercial floorspace, up to 128 sqm (GIA) of Class D2 leisure floorspace and up to 551sqm of Class A1-A3 floorspace within 13 blocks of between 2-12 storeys, with car and cycle parking and associated hard and soft landscaping.

At: BURGESS BUSINESS PARK, PARKHOUSE STREET, LONDON, SE5 7TJ

In accordance with application received on 22/12/2017

and Applicant's Drawing Nos. Aboricultural Impact Assessment (August 2018)

Bat Presence/Likely Absence Survey Report (August 2018)

Draft Business Relocation Strategy (August 2018)

Equalities Statement (August 2018)

Historic Environment Assessment (August 2018)

Internal Daylight Report (August 2018)

Phase 1 Environmental Risk Assessment (August 2018)

Planning Statement Addendum (August 2018)

Preliminary Ecology Appraisal (August 2018)

Energy Statement (August 2018)

Statement of Community Involvement (August 2018)

Sustainability Statement (August 2018)

Transport Assessment Addendum (August 2018)

Environmental Statement Volume 1 (August 2018)

Environmental Statement Volume 2 – Built Heritage, Townscape and Visual Impact Assessment (August 2018)

Environmental Statement Volume 3 – Appendices (August 2018)

Non-Technical Summary (August 2018)

Draft Construction Environmental Management Plan (December 2017)

Structural Feasibility Report (December 2017)

Utilities Report (December 2017)

Planning Statement (December 2017)

DUN-BUR_HTA-A_D01_DR_0001 1:500 A1 Existing Site Plan . P1

Proposed Site Plans

DUN-BUR_HTA-A_D01-B1-DR_0100 1:500 A1 Basement Floor Plan . P1

DUN-BUR_HTA-A_D01-00-DR_0101 1:500 A1 Ground Floor Plan P3

DUN-BUR_HTA-A_D01-01-DR_0102 1:500 A1 First Floor Plan .P3

DUN-BUR_HTA-A_D01-02-DR_0103 1:500 A1 Second Floor Plan . P1

DUN-BUR_HTA-A_D01-03-DR_0104 1:500 A1 Third Floor Plan . P1

DUN-BUR_HTA-A_D01-04-DR_0105 1:500 A1 Fourth Floor Plan . P1

DUN-BUR_HTA-A_D01-05-DR_0106 1:500 A1 Fifth Floor Plan . P1

DUN-BUR_HTA-A_D01-06-DR_0107 1:500 A1 Sixth Floor Plan . P1

DUN-BUR_HTA-A_D01-07-DR_0108 1:500 A1 Seventh Floor Plan . P1

DUN-BUR_HTA-A_D01-08-DR_0109 1:500 A1 Eighth Floor Plan . P2

DUN-BUR_HTA-A_D01-09-DR_0110 1:500 A1 Ninth Floor Plan . P1

DUN-BUR_HTA-A_D01-10-DR_0110-B 1:500 A1 Tenth Floor Plan . P1

DUN-BUR_HTA-A_D01-11-DR_0110-C 1:500 A1 Eleventh Floor Plan P1

DUN-BUR_HTA-A_D01-R1-DR_0111 1:500 A1 Roof Plan P1

Proposed Site Sections and Elevations

DUN-BUR_HTA-A_SAA-DR_0113 1:200 A1 Blocks M, K, H, G - Section AA . P2
 DUN-BUR_HTA-A_SBB-DR_0114 1:200 A1 Blocks E, I, H - Section BB . P1
 DUN-BUR_HTA-A_SCC-DR_0115 1:200 A1 Block M - Section CC . P1
 DUN-BUR_HTA-A_SDD-DR_0116 1:200 A1 Blocks C&A - Section DD . P1
 DUN-BUR_HTA-A_SEL-DR_0130 1:200 A1 Street Elevation, East - Blocks M, L . P1
 DUN-BUR_HTA-A_SEL-DR_0131 1:200 A1 Street Elevation, Southeast - Blocks E, I & H . P1
 DUN-BUR_HTA-A_SEL-DR_0132 1:200 A1 Street Elevation, Southwest - Blocks F, I, J . P1
 DUN-BUR_HTA-A_SEL-DR_0133 1:200 A1 Street Elevation, Northeast - Blocks J, E, D . P1
 DUN-BUR_HTA-A_SEL-DR_0134 1:200 A1 Street Elevation, Northwest - Blocks G, F, D, C . P1

Proposed Block Plans

DUN-BUR_HTA-A_BA-00&01_DR_0200 1:100 A1 Block A - Ground and First Floor Plans . P2
 DUN-BUR_HTA-A_BA-02&R1_DR_0201 1:100 A1 Block A - Second Floor and Roof Plans . P1
 DUN-BUR_HTA-A_BB-B1&00_DR_0202 1:100 A1 Block B - Basement and Ground Floor Plans . P1
 DUN-BUR_HTA-A_BB-01&02_DR_0203 1:100 A1 Block B - First and Second Floor Plans . P1
 DUN-BUR_HTA-A_BB-03&04_DR_0204 1:100 A1 Block B - Third and Fourth Floor Plans . P1
 DUN-BUR_HTA-A_BB-R1_DR_0204-B 1:100 A1 Block B - Roof Plan P1
 DUN-BUR_HTA-A_BC-00-R1_DR_0205 1:100 A1 Block C - Ground Floor to Roof Plans . P1
 DUN-BUR_HTA-A_BD-00-04_DR_0206 1:100 A1 Block D - Ground to Fourth Floor Plans . P1
 DUN-BUR_HTA-A_BD-05&06_DR_0207 1:100 A1 Block D - Fifth and Sixth Floor Plans . P1
 DUN-BUR_HTA-A_BD-07&R1_DR_0208 1:100 A1 Block D - Seventh and Roof Plans . P1
 DUN-BUR_HTA-A_BE-00-05_DR_0209 1:100 A1 Block E - Ground to Fifth Floor Plans . P1
 DUN-BUR_HTA-A_BE-06-R1_DR_0210 1:100 A1 Block E - Sixth Floor to Roof Plans . P1
 DUN-BUR_HTA-A_BF&G-00_DR_0211 1:100 A1 Blocks F&G - Ground Floor Plan . P1
 DUN-BUR_HTA-A_BF&G-01_DR_0212 1:100 A1 Blocks F&G - First Floor Plan P2
 DUN-BUR_HTA-A_BF&G-02-05_DR_0214 1:100 A1 Blocks F&G - Second to Fifth Floor Plans . P1
 DUN-BUR_HTA-A_BF&G-06_DR_0215 1:100 A1 Blocks F&G - Sixth Floor Plan .P1
 DUN-BUR_HTA-A_BF&G-07_DR_0216 1:100 A1 Blocks F&G - Seventh Floor Plan . P1
 DUN-BUR_HTA-A_BF&G-08_DR_0217 1:100 A1 Blocks F&G - Eighth Floor Plan . P2
 DUN-BUR_HTA-A_BF&G-R1_DR_0217-B 1:100 A1 Blocks F&G - Roof Plan P1
 DUN-BUR_HTA-A_BH&I-00_DR_0218 1:100 A1 Blocks H&I - Ground Floor Plan . P1
 DUN-BUR_HTA-A_BH&I-01_DR_0219 1:100 A1 Blocks H&I - First Floor Plan . P1
 DUN-BUR_HTA-A_BH&I-02-06_DR_0221 1:100 A1 Blocks H&I - Second to Sixth Floor Plans . P1
 DUN-BUR_HTA-A_BH&I-07_DR_0222 1:100 A1 Blocks H&I - Seventh Floor Plan . P1
 DUN-BUR_HTA-A_BH&I-08_DR_0223 1:100 A1 Blocks H&I - Eighth Floor Plan . P1
 DUN-BUR_HTA-A_BH&I-09_DR_0224 1:100 A1 Blocks H&I - Ninth Floor Plan . P1
 DUN-BUR_HTA-A_BH&I-10&11_DR_0224-B 1:100 A1 Blocks H&I - Tenth and Eleventh Floor Plans P1
 DUN-BUR_HTA-A_BH&I-14_DR_0225 1:100 A1 Blocks H&I - Roof Plan . P1
 DUN-BUR_HTA-A_BJ&K-00-05_DR_0226 1:100 A1 Block J&K - Ground to Fifth Floor Plans . P1
 DUN-BUR_HTA-A_BJ&K-06&07_DR_0227 1:100 A1 Block J&K - Sixth and Seventh Floor Plans . P1
 DUN-BUR_HTA-A_BJ&K-08&09_DR_0228 1:100 A1 Block J&K - Eighth and Ninth Floor Plans . P2
 DUN-BUR_HTA-A_BJ&K-10&R1_DR_0228-B 1:100 A1 Block J&K - Tenth Floor and Roof Plans P1
 DUN-BUR_HTA-A_BL-00-05_DR_0229 1:100 A1 Block L - Ground to Fifth Floor Plans . P1
 DUN-BUR_HTA-A_BL-R1_DR_0230 1:100 A1 Block L - Roof Plans . P1
 DUN-BUR_HTA-A_BM-00&01_DR_0231 1:100 A1 Block M - Ground and First Floor Plans P2
 DUN-BUR_HTA-A_BM-02-R1_DR_0232 1:100 A1 Block M - Second Floor to Roof Plans . P1

Proposed Elevations

DUN-BUR_HTA-A_BA-S1_DR_0240 1:100 A1 Block A - NW, NE, SE & SW Elevations . P1
 DUN-BUR_HTA-A_BB-S1_DR_0244 1:100 A1 Block B1 & B2 - NE Elevation . P1
 DUN-BUR_HTA-A_BB-S2_DR_0245 1:100 A1 Block B1 & B2 - SW Elevation . P1
 DUN-BUR_HTA-A_BB-S3_DR_0246 1:100 A1 Block B1 - SE & NW Elevations . P1
 DUN-BUR_HTA-A_BB-S4_DR_0247 1:100 A1 Block B2 - SE & NW Elevations . P1
 DUN-BUR_HTA-A_BC-S1_DR_0250 1:100 A1 Block C - NW, SE & SW Elevations . P1
 DUN-BUR_HTA-A_BD-S1_DR_0253 1:100 A1 Block D - NE & SE Elevations . P1
 DUN-BUR_HTA-A_BD-S2_DR_0254 1:100 A1 Block D - SW & NW Elevations . P1
 DUN-BUR_HTA-A_BE-S1_DR_0257 1:100 A1 Block E - NE & SE Elevations . P1
 DUN-BUR_HTA-A_BE-S2_DR_0258 1:100 A1 Block E - SW & NW Elevations . P1
 DUN-BUR_HTA-A_BF-S1_DR_0262 1:100 A1 Block F - SW Elevation . P1
 DUN-BUR_HTA-A_BF&G-S1_DR_0263 1:100 A1 Block F & G - NW Elevation . P1
 DUN-BUR_HTA-A_BF&G-S2_DR_0264 1:100 A1 Block F & G - N Elevation . P2
 DUN-BUR_HTA-A_BF&G-S3_DR_0265 1:100 A1 Block F & G - SE Elevation . P1
 DUN-BUR_HTA-A_BF-S2_DR_0266 1:100 A1 Block F - NE Elevation . P2
 DUN-BUR_HTA-A_BG-S1_DR_0267 1:100 A1 Block G - S Elevation . P1
 DUN-BUR_HTA-A_BG-S2_DR_0268 1:100 A1 Block G - SW Elevation . P1
 DUN-BUR_HTA-A_BF-S3_DR_0269 1:50 A1 Block F - Façade Detail Elevation . P1
 DUN-BUR_HTA-A_BG-S3_DR_0270 1:50 A1 Block G - Façade Detail Elevation . P1
 DUN-BUR_HTA-A_BH&I-S1_DR_0273 1:100 A1 Block H & I - SE Elevation . P1
 DUN-BUR_HTA-A_BH&I-S2_DR_0274 1:100 A1 Block H & I - NW Elevation . P1

DUN-BUR_HTA-A_BH-S1_DR_0275 1:100 A1 Block H - NE & SW Elevations . P1
 DUN-BUR_HTA-A_BI-S1_DR_0276 1:100 A1 Block I - NE & SW Elevations . P1
 DUN-BUR_HTA-A_BI-S2_DR_0277 1:50 A1 Block I - Façade Detail Elevation . P1
 DUN-BUR_HTA-A_BH-S2_DR_0278 1:50 A1 Block H - Façade Detail Elevation . P1
 DUN-BUR_HTA-A_BJ&K-S1_DR_0280 1:100 A1 Block J & K - NW Elevation . P1
 DUN-BUR_HTA-A_BJ&K-S2_DR_0281 1:100 A1 Block J & K - SE Elevation . P1
 DUN-BUR_HTA-A_BJ-S1_DR_0282 1:100 A1 Block J - SW Elevations . P1
 DUN-BUR_HTA-A_BJ-S2_DR_0283 1:50 A1 Block J - Façade Detail Elevation . P1
 DUN-BUR_HTA-A_BL-S1_DR_0286 1:100 A1 Block L - E Elevation . P1
 DUN-BUR_HTA-A_BL-S2_DR_0287 1:100 A1 Block L - NW & NE Elevations . P1
 DUN-BUR_HTA-A_BM-S1_DR_0290 1:100 A1 Block M - E, S & W Elevations . P1

Landscape

HTA-L_DR_00_0900 1/500 A1 Public Realm GA Plan . P1
 HTA-L_DR_00_0905 1/500 A1 Public Realm Illustrative Plan . P1
 HTA-L_DR_ZZ_0910 1/500 A1 Private Amenity GA Plan . P1
 HTA-L_DR_ZZ_0915 1/500 A1 Private Amenity Illustrative Plan . P1
 HTA-L_DR_00_0920 1/100 A1 Public Realm Sections - Page 1 of 2 . P1
 HTA-L_DR_00_0921 1/100 A1 Public Realm Sections - Page 2 of 2 . P1
 HTA-L_DR_ZZ_0925 1/50 A1 Private Amenity Sections .

Reports

DUN-BUR_HTA-A_DOC_DAS A3 Design and Access Statement .
 DUN-BUR_HTA-A_DOC_DAS - Addendum A3 Design and Access Statement - Addendum .

Schedules

DUN-BUR_HTA-A_SC_001 A3 Schedule of Accommodation . P1
 DUN-BUR_HTA-A_SC_002 A3 Commercial Accommodation Schedule . P1

Subject to the following forty-seven 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:

Proposed Site Plans

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DUN-BUR_HTA-A_BJ-S2_DR_0283 1:50 A1 Block J - Façade Detail Elevation . P1
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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 No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

- 4 Development shall not be commenced until impact studies of the existing water supply infrastructure have been submitted to, and approved in writing by, the Local Planning Authority (in consultation with Thames Water). The studies must determine the magnitude of any new additional capacity required in the system and a suitable connection point.

Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with additional demand.

- 5 Prior to the commencement of development, details to ensure the protection of the existing brick chimney stack during demolition and construction works shall be submitted to and approved in writing by the Local Planning Authority, and the works carried out in accordance with the details thereby approved.

Within one year of the commencement of development a scheme for the restoration of the existing brick chimney on the site shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the details thereby approved.

Reason:

To protect the chimney as part of the industrial heritage of the site, in accordance with strategic policy 12 'Design and conservation' of the Core Strategy (2011).

- 6 No demolition work for a phase (phase 1= blocks A and B, phase 2 = blocks C-M) shall take place until a demolition environmental management plan for that phase has been submitted to and approved in writing by the Local Planning Authority.

No construction work for a phase shall take place until a construction environmental management plan for that phase has been submitted to and approved in writing by the Local Planning Authority.

The demolition and construction environmental management plans shall oblige the applicant, or developer and its contractor to commit to current best practice with regard to site management and to use all best endeavours to minimise disturbances including but not limited to noise, vibration, dust, smoke and plant emissions emanating from the site during any demolition and construction and will include the following information:

A detailed specification of demolition and construction works at each phase of development including consideration of environmental impacts (noise, dust, emissions to air) and the required remedial measures;

Engineering measures to eliminate or mitigate specific environmental impacts (noise, dust, emissions to air), e.g. acoustic screening, sound insulation, dust control, emission reduction.

Arrangements for direct responsive contact with the site management during demolition and/or construction;
A commitment to adopt and implement of the ICE Demolition Protocol, Considerate Contractor Scheme registration,

To follow current best construction practice e.g. Southwark's Code of Construction Practice & GLA/London Council's Best Practice Guide Dust & Plant Emissions

Routing of site traffic;

Waste storage, separation and disposal

All demolition and construction work shall be undertaken in strict accordance with the management scheme and code of practice

Working hours shall be limited to 0800-1800 Monday to Friday, 0900-1400 on Saturdays and no working on Sundays and public holidays.

The demolition and construction works shall be carried out in accordance with the details thereby approved.

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, 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.

- 7
- a) Prior to the commencement of development, a Phase 2 site investigation and risk assessment shall be 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 would 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 that 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 measures identified in the approved remediation strategy, a verification report providing evidence that all work required by the remediation strategy has been completed shall be submitted to and approved in writing by the Local Planning Authority.
- d) In the event that 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 offsite 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.

- 8
- Prior to works commencing (excluding demolition), full details of all proposed planting of 39 trees to include 16 street trees 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.

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 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.

- 9 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 2018 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.

- 10 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 section 16 of the National Planning Policy Framework, policy 12 of the Core Strategy 2011 and saved policy 3.19 of the Southwark Plan 2007

- 11 Before any work hereby authorised begins, excluding demolition, 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 section 16 of the National Planning Policy Framework, policy 12 of the Core Strategy 2011 and saved policy 3.19 of the Southwark Plan 200.7

- 12 Before any work hereby authorised begins, excluding demolition, the applicant shall submit a written scheme of investigation for a programme of archaeological recording, which shall be approved in writing by the Local Planning Authority and implemented and shall not be carried out other than in accordance with any such approval given.

Reason: In order that the details of the programme of archaeological excavation and recording 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 section 16 of the National Planning Policy Framework, policy 12 of the Core Strategy 2011 and saved policy 3.19 of the Southwark Plan 2007

- 13 No works shall commence (excluding demolition) until a detailed surface water drainage strategy which incorporates Sustainable Drainage Systems (SuDS) principals has been submitted to and approved in writing by the Local Planning Authority. The strategy shall adhere to the recommendations of the 2016 Southwark Strategic Flood Risk Assessment (SFRA) and the London Plan (2016) and must indicate SuDS feature types, their locations, attenuation volumes, discharge rates etc.

The development must be carried out in accordance with the details thereby approved.

Reason:

To minimise the potential for the site to contribute to surface water flooding in accordance with section 14 of the NPPF, policy 5.12 'Flood risk management' of the London Plan (2016) and Strategic Policy 13 'High environmental standards' of the Core Strategy (2011).

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.

- 14 Before any above grade work hereby authorised begins, a detailed method statement for the removal or long-term management /eradication of Japanese Knotweed at the site shall be submitted to and approved in writing by the local planning authority. The method statement shall include proposed measures to prevent the spread of this plant during any operations such as mowing, strimming or soil movement. It shall also contain measures to ensure that any soils brought to the site are free of the seeds / root / stem of any invasive plant covered under the Wildlife and Countryside Act 1981. Development shall proceed in accordance with the approved method statement.

Reason: Japanese Knotweed is an invasive plant, the spread of which is prohibited under the Wildlife and Countryside Act 1981. Without measures to prevent its spread as a result of the development there would be the risk of an offence being committed and avoidable harm to the environment occurring.

- 15 Prior to above grade works commencing, material samples/sample-panels/sample-boards of all facing materials 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.

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.

- 16 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.

- 17 Before any above grade work hereby authorised begins on a particular block, details (1:50 scale drawings) of the facilities to be provided for the secure and covered storage of cycles for that block 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 2018, Strategic Policy 2 - Sustainable Transport of The Core Strategy and Saved Policy 5.3 Walking and Cycling of the Southwark Plan 2007.

- 18 Before any above grade work hereby authorised begins, details of the means of enclosure for all site boundaries, including a 2.4m high boundary with Burgess Park 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 the interests of visual and residential amenity 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, 3.12 Quality in Design, and 3.13 Urban design of the Southwark Plan 2007.

- 19 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 2016, saved policy 3.28 of the Southwark Plan and Strategic Policy 11 of the Southwark Core strategy (2011).

- 20 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 2018 Chapters 8, 12, 15 & 16 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.

- 21 A full-scale mock-up of the façade of the 12-storey tower (block I) to be used in the carrying out of this permission shall be presented on site and approved in writing by the Local Planning Authority before any above ground work in connection with block I is carried out; the development shall not be carried out otherwise than in accordance with any such approval given. The mock-up must present all aspects of the tall building and 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 NPPF (2018), 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).

- 22 Section detail-drawings for each particular block at a scale of at least 1:10 through:

- the facades;
- the balconies;
- parapets; and
- 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 before any above grade work hereby authorised begins on that particular block (except for demolition works). 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 and 3.13 Urban Design of the Southwark Plan 2007.

- 23 Prior to the commencement of above grade works details of 2 Bat boxes, 6 Swift bricks and 6 Sparrow bricks shall be submitted to and approved in writing by the Local Planning Authority. The details shall include the exact location, specification and design of the habitats. The boxes / bricks 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.

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, Saved Policy 3.28 of the Southwark Plan (2007) and Strategic Policy 11 of the Southwark Core strategy (2011).

- 24 Prior to the commencement of above grade work on any of the following blocks, details of obscure glazing or other privacy devices for that block shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the details thereby approved, with the obscure glazing / privacy devices provided prior the occupation of units affected and retained as such thereafter.

Block A - first floor rear windows (top opening only and obscure glazed up to 1.8m) and side windows facing Southampton Way.

Block B - Side windows and balconies facing 13 Parkhouse Street and side windows and balconies facing 21-23 Parkhouse Street (windows to be obscure glazed and non-opening).

Block C - Screening to proposed rear deck access and screening to balcony facing 45 Southampton Way.

Blocks E and J - windows within these blocks facing each other.

Blocks F and G - windows within these blocks facing each other.

Blocks G and I - windows within these blocks facing each other.

Blocks H and L - windows within these blocks facing each other.

Block J - west-facing windows overlooking the scaffold yard (windows to be removed, or top-opening only and obscure glazed up to 1.8m).

Block M (at all floor levels) - windows shall be obscure glazed up to 1.8m and top opening only.

Reason

In order to protect the privacy and amenity of the occupiers and users of the adjoining properties from undue overlooking 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.

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.

- 25 Before the first occupation of a particular block, the car parking for that block shall be made available, and retained for the purposes of car parking for vehicles of residents of that block and no trade or business shall be carried out thereon. 20% active and 20% passive electric vehicle charging points shall be provided.

Reason

To ensure the permanent retention of the parking areas, to avoid obstruction of the surrounding streets by waiting vehicles and to safeguard the amenities of the adjoining properties in accordance with The National Planning Policy Framework 2018, Strategic Policy 2 Sustainable Transport of The Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity, Policy 5.2 Transport Impacts and 5.6 Car Parking of the Southwark Plan 2007 and Strategic Policy 2 Sustainable Transport of the Core Strategy 2011.

- 26 Before the first occupation of the development hereby permitted a Service Management Plan detailing how all elements of the site are to be serviced shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approval given and shall remain for as long as the development is occupied.

Servicing for the commercial space shall only take place between the hours of 0800-1800 Mondays to Saturdays and not at all on Sundays. No servicing by Heavy Goods Vehicles shall take place between 0800-0900 and 1500-1600 during school term time.

Reason

To ensure compliance 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.

- 27 Prior to the commencement of above grade works on a particular block, full particulars and details of a scheme for the ventilation of the block to an appropriate outlet level, including details of sound attenuation for any necessary plant and the standard of dilution expected, has been submitted to and approved by the Local Planning Authority.

Any commercial kitchen extraction system shall be designed to ensure the ventilation rate is adequate for the size of the area to be ventilated, that the exhaust air is adequately filtered and that exhaust air has a minimum residence time in the carbon filter bank of 0.1s. All components of the extraction system shall be cleaned, serviced, maintained and replaced fully in accordance with manufacturer's recommendations.

The development shall not be carried out otherwise than in accordance with any approval given.

Reason

In order to ensure that 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.

- 28 Prior to the occupation of any particular block, details to demonstrate that the block has achieved or is on course to achieve secure by design certification shall be submitted to and approved in writing by the Local Planning Authority. Within three months of the final occupation of the development details of Secure by Design for the entire site shall be submitted to the Local Planning Authority for approval in writing.

Reason

To ensure a safe and secure development, in accordance with saved policy 3.14 'Designing out crime' of the Southwark Plan (2007).

- 29 Prior to the first occupation of the development, details of the following shall be submitted to and approved in writing by the Local Planning Authority:
- i) Details of mechanisms for ensuring one-way east to west vehicular traffic routing within the site;
 - ii) Details of bollards within the proposed development, including their positions in relation to the adjacent footways.

The development shall be carried out in accordance with the details thereby approved.

Reason:

In the interests of highway safety, in accordance with saved policy 5.2 'Transport impacts' of the Southwark Plan (2007).

- 30 The residential units in blocks A and C shall have access to communal amenity space within the development, details of which, including how access would be secured, shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation phase 2 (blocks C-M). The development shall be carried out in accordance with the details thereby approved.

Reason:

To ensure that all units within the development would have access to communal amenity space, in accordance with saved policy 4.2 'Quality of accommodation' of the Southwark Plan (2007) and guidance within the Residential Design Standards SPD (2015).

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.

- 31 Of the residential units hereby permitted, 90% shall meet Building Regulation requirement M4 (2) and 10% shall meet Building Regulation requirement M4 (3).

Reason

In order to comply with policy 3.8 of the London Plan 2016.

- 32 Before the first occupation of a particular block, the refuse storage arrangements shown on the approved drawings for that block shall be provided and made available for use by the occupiers of the block and the facilities provided 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 2018, Strategic Policy 13 High Environmental Standards of the Core Strategy 201 and Saved Policies 3.2 Protection of Amenity and Policy 3.7 Waste Reduction of The Southwark Plan 2007

- 33 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 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.

- 34 The A1-A3 and D2 uses hereby permitted shall not be permitted to open outside the hours of 0700-2300 daily.

Reason:

To safeguard the amenities 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

- 35 Plant Noise

The rated noise level from any plant, together with any associated ducting shall be 10 dB(A) or more below the lowest relevant measured LA90 (15min) at the nearest noise sensitive premises.

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.

36 External Noise Levels in Amenity Areas

Private and communal external amenity areas shall be designed to achieve 55dB(A) LAeq, 16hr +.

+Daytime - 16 hours between 07:00-23:00hrs.

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.

37 Amplified sound

The LFmax sound from amplified and non-amplified music and speech shall not exceed the lowest L90 (5min), 1m from the facade of any sensitive receptor in all third octave bands between 31.5Hz and 8 kHz.

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.

38 Residential units above commercial units

Party walls, floors and ceilings between the commercial premises and residential dwellings shall be designed to achieve the following minimum airborne sound insulation weighted standardised level difference:

For A3 premises or large A1 cafes, shops and supermarkets: At least 55d DnT,w + Ctr. For small A1 café or shop: at least 50dB DnT,w + Ctr.

For D2 premises standards will be judged on a case by case basis depending on the exact nature of the use. Greater than 60dB DnT,w + Ctr is likely to be necessary. Details shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the relevant block.

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.

39 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.

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.

- 40 Notwithstanding the provisions of part 2, schedule 1, classes A to I of the Town and Country Planning General Permitted Development Order (or amendment or re-enactment thereof) no extension, enlargement or other alteration of the premises shall be carried out to the houses in block A.

Reason

To safeguard the character and the amenities of the premises and adjoining properties in accordance with Strategic Policy 13 - High environmental standards and Strategic Policy 12 - Design and conservation of The Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity, 3.12 Quality in Design of the Southwark Plan 2007 and the National Planning Policy Framework 2018.

- 41 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.

- 42 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.

- 43 Solid balustrades shall be provided to the four balconies in blocks F, G, H and I identified within the Environmental Statement as locations 200, 206, 208 and 211.

Reason:

In the interests of amenity; to ensure that wind conditions within the balconies would fall within acceptable limits in accordance with strategic policy 13 'High environmental standards' of the Southwark Plan (2001) and saved policy 3.2 'Protection of amenity' of the Southwark Plan (2007).

- 44 The secondary access into the site at 33 Southampton Way shall be for pedestrians and cyclists only, with no vehicle access permitted.

Reason:

To ensure no loss of amenity to neighbouring residential occupiers, in accordance with saved policy 3.2 'Protection of amenity' of the Southwark Plan (2007) and strategic policy 13 'High environmental standards' of the Core Strategy (2011).

- 45 The gate(s) across the access to the vehicle yard between blocks L and M shall be positioned at least 6m back from the rear of the footway on Wells Way. In the event that a new route to Burgess Park is required through the site between blocks A and B, the gate(s) across the entrance to these blocks from Parkhouse Street shall be removed.

Reason:

In the interests of pedestrian safety in accordance with saved policy 5.2 'Transport impacts' of the Southwark Plan (2007), and to safeguard the potential for a new route into Burgess Park if required in the future.

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).

- 46 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 2018.

- 47 a) Before any fit out works to the commercial premises within a particular block 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 for the A and B class floorspace and 'very good' rating for the D class floorspace 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;
- b) Before the first occupation of the block, 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 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.

Statement of positive and proactive action in dealing with the application

Pre-application advice was provided and changes made during the course of the application in order to enable it to be recommended for approval.

Informatives

1 Highways informatives:

The Highway Authority requires works to all existing and any proposed new streets and spaces (given for adoption or not) to be designed and constructed to adoptable standards.

Southwark Council's published adoptable standards as Highway Authority are contained in the Southwark Streetscape Design Manual (SSDM), www.southwark.gov.uk/ssdm.

Applicants will be required to enter into a s278 agreement under the Highways Act 1980 for any works to existing adopted Highways.

2 Residential Internal noise levels

With respect to the night-time LAFmax noise levels, the WHO Guidelines for Community Noise state: 'For a good sleep, it is believed that indoor sound pressure levels should not exceed approximately 45 dB LAmax more than 10–15 times per night'

LAFmax should be reported for individual noise events. Time-based reporting periods (such as LAFmax per 5 minute periods) should only be used where it can be demonstrated that only one significant event occurs in each reporting period. It may be necessary to use the sound level trace to verify when individual events have occurred. It is important that assessment of LAFmax events covers enough time to gain a representative picture of the typical level and regularity of such events.

- 3 UXO - The development of the site should include adequate provision for the surveying the site for potential Unexploded Ordnance. If that survey work identifies any anomalies that may be UXO, the site operators must contact both the police and the local Authority at an early opportunity to agree timescales and further actions.

- 4 The removal of shrubs and trees from the should take place outside of the nesting bird season (March to August).

- 5 There is a Thames Water main crossing the development site which may/will need to be diverted at the Developer's cost, or necessitate amendments to the proposed development design so that the aforementioned main can be retained. Unrestricted access must be available at all times for maintenance and repair. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0800 009 3921 for further information.

- 6 In order to discharge the condition requiring a surface water drainage strategy, you are advised that the strategy must demonstrate that the site is safe in the event of blockage/failure of the system, and should there be overflow of the system for storms greater than those of the standards, exceedance flows must be directed away from property in these events. The Environment Agency upper end allocation for climate change for the lifetime of the development should be applied to rainfall for calculation of the total attenuation volume

which is currently 40% for residential and commercial development.

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Date: 30/11/2016

Dear Mr Morris

TOWN & COUNTRY PLANNING ACT 1990 (as amended)
PRE-APPLICATION ENQUIRY

At: SITE BOUNDED BY SOUTHAMPTON WAY, WELLS WAY, COTTAGE GREEN AND PARKHOUSE STREET
Proposal: Re-development of the site to deliver 4,100sqm of commercial floor space and 409 residential units.

I write in connection with your pre-application enquiry received on 08/08/2016 regarding a scheme to redevelop the site above. This letter summarises the council's written advice on your proposal and whether, based on the details submitted, it meets local planning requirements

Planning Policy

The statutory development plan for the borough comprises The London Plan (2016); The Core Strategy (2011) and saved policies from the Southwark Plan (2007).

The site is located within the:

- Urban Density Zone
- Air Quality Management Area
- Parkhouse Preferred Industrial Location (PIL) - local
- Possible Public Transport Depot
- Area where 35% affordable and 35% private housing is required.

The site is within the setting of a number of heritage assets including the grade II listed Collingwood House on Cottage Green and 73, 75 and 77 Southampton Way. In addition, the proposed development would affect the setting of a number of heritage assets including the grade II Listed 113 Wells Way, the Wells Way Baths, and the former St George Church on Wells Way, together with the Addington Square conservation Area which is to the west across Burgess Park.

Other key material considerations

The National Planning Policy Framework
 National Planning Practice Guidance

Land Use

The site is designated a Preferred Industrial Location (PIL) where Industrial uses are both protected and encouraged (Southwark Plan saved policy 1.2 and Core Strategy policy SP10). The site is no longer required as a possible public transport depot because the cross river tram is no longer being pursued.

The proposal is to provide 4,100sqm of commercial floorspace and 409 residential units, with the commercial floorspace potentially including retail as well as employment space. Residential is not normally an acceptable use in Preferred Industrial Locations, which are protected for industrial, warehousing and industrial-style sui generis uses. The text which supports saved Policy 1.2 explains that the policy is intended to protect clusters of employment uses which may benefit from the segregation from more sensitive uses such as housing. However, the emerging policy within the New Southwark Plan (NSP) reviews this designation and indicates that the PIL would become a mixed use neighbourhood where development would be intensified, job numbers increased, and business growth promoted (policy DM23). The likelihood is that residential use would form part of the mixed use neighbourhood. The NSP is currently at the second consultation stage and over time additional weight would be attached to the emerging policy. In any event draft policy DM23 states that as a minimum, there should be no loss of commercial/employment floorspace.

The provision of residential on the site would represent a departure from the adopted development plan and as an application is likely to be submitted next year, it would be premature in relation to the emerging new planning policies for the borough. The proposal would therefore need to demonstrate significant regeneration benefits to justify the departure from adopted policy, and should not compromise the delivery of emerging objectives set out in the draft New Southwark Plan. In considering whether the benefits would justify supporting the proposal, officers would consider / require, among other things:

- The quantum and quality of business space to be re-provided on the site and its likely appeal to a range of businesses and sectors;
- Evidence of a clear understanding of the likely market for the employment space on the site, what their requirements would be, and how the proposal would help to meet them;
- Evidence of a marketing and management strategy that would give confidence that the site would remain as a viable and attractive business location;
- A strategy which identifies the potential for relocation of existing businesses or consideration of relocating existing businesses on the site and provision of affordable business space;
- Information about exemplar mixed-use projects and identification of those factors, including design, servicing, management, location and access, which help to make those projects a success and showing how this information informed the proposal.

Notwithstanding that your client intends to apply for a Lawful Development Certificate to change the existing employment floorspace to residential under permitted development rights, the starting point for any planning application on this site must be that all of the existing employment floorspace must be re-provided. There is currently approximately 8,000sqm of employment space on the site, and just over half of this would be re-provided. Whilst the principle of providing residential use on the site could be supported (subject to all other policy matters being found acceptable), there are significant concerns that insufficient employment space would be provided and officers consider this element of the proposal to be unacceptable.

In relation to how a successful employment component could be provided, two studies have been carried out which provide useful guidance. In 2012 the Council prepared an employment study for Canada Water which aimed to assess demand for employment space in that area. The study was informed by a survey of agents and operators which sought to gain views on the types of space and their characteristics which help to comprise successful business locations (the study is available on the council's website:

http://www.southwark.gov.uk/download/downloads/id/10363/harmsworth_quays_non-residential_use_s_study_october_2012.)

Whilst the site is not in Canada Water, the study contains some messages which could be relevant to your proposal which in summary are:

- To maximise interest for the widest business community, operators interviewed considered that business space provision should be flexible in accommodating different sectors and uses. In terms of the characteristics of space, demand is strongest for serviced or managed space suitable for small and medium-sized enterprises (SMEs) with flexible leasing conditions (easy in and out leasing), low rental values and incentives to attract start ups.
- The research has shown that business space should ideally be provided in stand alone buildings and should be clustered to create a business community which can connect and share services. While ground floor B1 accommodation in residential buildings is often the preferred configuration for developers, it is generally more appropriate for particular types of users such as estate agents, accountants, solicitors and retail. A self-contained separate building is often a more attractive option for a cluster of similar business which can benefit from shared knowledge and services, and create a business community with a strong brand and identity.

A 2011 study carried out by Camden Council also reiterates the finding that ground floor business units in residential developments are often unattractive to business occupiers. Concerns included visibility, security and difficulties in subdividing large floor plates while retaining natural light:

(http://www.camden.gov.uk/ccm/cms-service/download/asset?asset_id=2688836).

- Operators and developers were clear that commercial space would only work as part of mixed use schemes if provided in certain ways. For mixed-use development to work, careful consideration needs to be given to the relationship between uses as residential occupiers and commercial tenants would have different aspirations and requirements which require management.
- Successful workspaces have a centre or hub, which lends itself to a community feel and sense of place. Specific user requirements include:
 - Keenly priced, modern, well designed, serviced and flexible space.
 - Start-up space available on easy-out easy-in terms.
 - A combination of well managed and competitively priced serviced space.
 - Good levels of data connectivity, potential for fibre optic and high speed broadband.
 - A range of space to accommodate small and medium sized enterprises and to allow them to grow as their business develops.
 - Incubator space – inclusive, 'all-in' space.

You have already been provided with a list of specialist workspace providers and discussions have taken place with most of them, which is encouraging. It is acknowledged that the scheme is at an early stage of development and we assume that future discussions will be able to focus on the type and nature of the commercial space, based on advice from market specialists.

To conclude in relation to land use, whilst the principle of a mixed use development on the site could be supported under the emerging policy, the quantum of employment floorspace would need to be significantly increased. If the application were to come forward in advance of the adoption of the New Southwark Plan, it would be considered as a Departure from the adopted Southwark Plan, which would require a clear justification in terms of how the benefits of the scheme outweigh the adopted policies..

Environmental impact assessment

Given the size of the site and the scale of the proposals, you are advised to apply for a screening opinion under the Town and Country Planning (Environmental Impact Assessment) Regulations (2015).

Design

The main part of the site sits to the south of the curve formed by Parkhouse Street and has frontages to this road, to Wells Way to the east, and a modest frontage to Southampton Way to the south-west. The site also includes a smaller area of land on the north-western side of Parkhouse Street which extends to adjoin Burgess Park. With the exception of a brick chimney on the main

part of the site, it is understood that all of the existing structures would be demolished. This approach is considered to be acceptable. With the exception of the chimney, the retention of which is welcomed, the buildings make a limited contribution to the site and the streetscene and there are no objections to their loss.

Arrangement, Height, Scale and Massing - The development would be arranged in four parts around a new, predominantly pedestrian route designed to link Wells Way with Parkhouse Street. This new route would divide the site into four legible blocks and would extend across Parkhouse Street to the edge of Burgess Park to the north-west. The buildings have been arranged to retain the option to extend the route to Southampton Way, depending on the way in which the adjoining site (which is in separate ownership) is ultimately redeveloped. Whilst this approach is considered to be sound, there are concerns that the proposal for the smaller part of the site on the north-western side of Parkhouse Street would not allow for a potential route to the park. It would deliver the start of a route, but a 6-storey building shown at the park boundary would close it off. The width of this building would therefore need to be reduced in order to enable the route to continue.

The development would be laid out as four urban blocks, with the buildings forming strong edges facing onto the existing streets and the proposed new route. A high quality landscaping scheme including new tree planting would be key to delivering a high quality environment which would be an attractive place in which to live and work. In particular, new tree planting should be provided along the street frontages and along the proposed new routes. The current layout does not appear to provide sufficient space for new street trees and the building footprints should be adjusted accordingly. Guidance for the planting of new street trees can be found in the Southwark Streetscape Design Manual, the link to which is below:

http://www.southwark.gov.uk/info/200456/southwark_streetscape_design_manual_ssdms

In the main the buildings would range from 4 to 8 storeys in height. Each urban block has been designed as a collection of mid-rise buildings with lower scaled link buildings which would create a unified frontage on the ground floor and introduce gaps in the roof-line. This highly articulated model of urban design would ensure that the built form would not be overly dominant or imposing, although the buildings would need to be set sufficiently far back along Parkhouse Street to avoid it appearing overly canyon-like. Where the development would abut the existing townscape on Wells Way and Parkhouse Street, the height of the blocks would be stepped down in deliberate stages to reflect the lower residential scale of these streets.

The proposal includes a wholly commercial building on Wells Way which would be an 'island' block which would mark the location of the new route into the site. Whilst this use would be appropriate in this location and gives the development a clear expression on a key frontage, the remainder of the development is likely to appear overly residential, especially where residential properties would start from the first floor level upwards. The design of the scheme should ensure that the commercial character of the area is preserved, with active commercial frontages placed on the perimeter of the new blocks, not just on the new central route. In particular, the 'bookend' blocks at the three corners of the largest block should include a stronger commercial offer, extending to two or three storeys in these locations, especially on Parkhouse Street where as currently shown residential properties would sit immediately adjacent to existing industrial sites. Incorporating this change would not only be an improvement in design terms, but it would also contribute to addressing the land use issue raised above.

In general the strategy for the height, scale and massing of the perimeter blocks is considered to be appropriate (the tall building is considered separately below). The range of heights proposed has the potential to result in a highly articulated built form which would be of an appropriate scale for this part of the borough and in relation to the proposed new route through the site. One area that appears to be less well developed and requires further refinement however, is the smaller part of the site on the north-western side of Parkhouse Street. In addition to the concerns raised above regarding the potential route to the park, there are concerns regarding the height of the buildings on this part of the site which are shown as being up to 5-storeys next to existing 2-storey dwellings, increasing to 6-storeys next to the park.

Officers consider that development on this part of the site would be more appropriate at 3-4 storeys on Parkhouse Street, potentially rising to 6 or 7 storeys onto the park edge provided the buildings were set at least 5m back from the park edge and serviced from Parkhouse Street. The southern section of this part of the site which extends to the rear of Southampton Way would be better suited to a modest group of 2-3 storey mews houses which could be accessed from Southampton Way, but serviced from Parkhouse Street. It is not considered necessary to provide a public route to Southampton Way through this part of the site.

Limited architectural details have been provided to date. Whilst the use of brick would be appropriate, efforts should be made to ensure that the various buildings would be sufficiently distinct; double height commercial space with strong bases could help to achieve this. Given the scale of the development, and the number of new buildings proposed, we would expect to see additional architects involved, in order to achieve architectural variety and to create more distinctiveness to the individual buildings.

Tall building - A 14-storey tower is proposed in the centre of the main part of the site. As it would be over 30m high and significantly taller than the immediate context it would need to comply with all of the requirements of saved policy 3.20 of the Southwark Plan 'Tall buildings'. This requires all tall buildings to:

- i. Make a positive contribution to the landscape; and
- ii. Be located at a point of landmark significance; and
- iii. Be of the highest architectural standard; and
- iv. Relate well to their surroundings, particularly at street level; and
- v. Contribute positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.

Taking each of these in turn the following issues have been identified:

i. In order to conform with this requirement, the proposed public realm and the landscaped setting of the tall building would need to be very high quality, proportionate to the proposed height, and delivered within the confines of the site. The proposal currently has the potential to achieve this, and the landscape design should be developed to demonstrate its quality. The space to be created should be bench marked against similar urban spaces to demonstrate that it would be suitable for a building of the scale proposed.

ii. Demonstrating that the proposed location is a point of landmark significance. The site is considered to be of a size that could support a concentration of scale. In addition, the confluence of a number of new routes across the site in close proximity to Burgess Park - an extensive open setting - as well as the possibility of creating a new destination in this industrial area suggest that this could be justified at the central square location shown on the plans.

iii. The submitted information is architecturally 'neutral' at this stage. The tall building is illustrated as a larger brick building and does not give the impression of a high quality design. This design runs the risk that it may appear like all of the other buildings in the development, and would not be sufficiently distinct as a local landmark building of higher stature or importance in the master plan. Furthermore, the internal layouts suggest that the tower would accommodate 6-7 units per floor, however from certain angles (in particular View 2) it would lack elegance when viewed from its broad flank. The design requires further refinement to achieve a vertical emphasis and a more slender proportion when viewed from the side. It should also include a careful re-appraisal of the proposed materials with a view to incorporating new high quality materials (such as stone and or metal cladding for example) that would complement the brick but distinguish the tall building more deliberately from the other buildings in the development.

iv. The tall building should integrate itself into the activities on the ground, including the new square which would form its setting, and the proposed new route through the site. The proposal is for a colonnaded design and an active commercial space at the base which would be appropriate. However, the confluence of routes at the base of the tower would give it a higher status and the commercial activity in this location should be more dominant, extending to two or three floors to bring

a better focus onto the square.

v. The views submitted demonstrate that the tall building would be visible from certain vantage points and would appear as a pinnacle at the centre of the development. This would appear as a natural stepping up in scale rather than a stark contrast in height, with the buildings generally peeling away from sensitive landmarks - listed buildings - and in the main appearing over the rooftops of development in the foreground. With regard to the point above in respect of the proportions and elegance of the building from certain locations, the proposal requires further refinement. Local views which include the tall building in the setting of listed buildings, especially views 1, 2; 5 and 6 (without the Southwark proposal on the adjoining site shown in the foreground) should be rendered. In addition, two additional views should be prepared:

1. from Cottage Green to demonstrate how the development would affect the setting of the Grade II listed Collingwood House
2. from Addington Square - south-west corner - to demonstrate how the tall building would affect the setting of the conservation area

Density

Strategic policy 5 of the Core Strategy permits a density of 200-700 habitable rooms per hectare in the urban density zone. Maximum densities may be exceeded where developments achieve the highest standard of design, exceeding minimum internal space standards as well as providing an acceptable standard of daylight and sunlight, privacy, good outlook and amenity space; further guidance is provided in the Council's Residential Design Standards SPD, the link to which is below:

http://www.southwark.gov.uk/downloads/download/2257/residential_design_standards_spd

The submission advises that the density of the proposed development would be 1,081 habitable rooms per hectare, which would significantly exceed the prescribed range. It is not known whether this would include the B1 floorspace which would increase the density further and this should be clarified. The methodology for calculating the density of mixed-use developments is set out in the Southwark Plan, which requires areas of non-residential space to be divided by 27.5 to create an equivalent in terms of habitable rooms per hectare. As the proposed development would exceed the prescribed range, the quality of accommodation would need to be exemplary and guidance as to the criteria used to assess this can be found in the Residential Design Standards SPD.

Housing Mix

The proposed dwelling mix would comprise 58% 2+ bed units (60% is required) and 17% 3+ bed units (20% is required). The proposal would therefore need to be amended to provide a policy compliant mix of units in accordance with strategic policy 7 of the Core Strategy. Given that the proposal would not include the conversion of any existing buildings, there should be no reason why the required dwelling mix cannot be achieved.

Housing tenure

No information has been provided regarding affordable housing. Given that the proposed development would represent a departure from the development plan and would be premature of emerging new policies, as a very minimum a policy compliant amount of affordable housing would be expected. This would be important in demonstrating the regeneration benefits of the proposal. Strategic policy 6 of the Core Strategy requires 35% affordable housing on site and this is calculated by habitable rooms for developments of 15 or more units. With regard to tenure, saved policy 4.4 of the Southwark Plan requires a split of 70% social rented and 30% intermediate in this area. A mix of housing types and sizes for the affordable units would be required and studio units are not permitted as affordable units. A viability report would be required to support the proposed affordable housing offer, in accordance with the Council's adopted Development Viability SPD.

Housing Quality

Detailed guidance is contained in the Residential Design Standards SPD including amenity space and childrens' playspace requirements. All 3+bed units must have at least 10sqm of private amenity space. Although your document describes the development as providing 'generous private and shared amenity space' it is not clear how communal space would be provided for some of the blocks, and the townhouses and maisonettes appear to have little opportunity for garden space. It is also not clear how childrens play has been provided in the scheme.

Dwellings should be designed to have integral bulk storage facilities and should have a mix of open plan living-kitchen-diners and units with separate kitchen diners to offer choice to potential occupiers. All three bed affordable dwellings should be designed to have self-contained kitchens in accordance with guidance in the 2015 Technical Update to the Residential Design Standards SPD (2011).

In the absence of detailed accommodation layouts it has not been possible to assess the internal space standards, the quality of residential accommodation or amenity space. It is noted however, that the layouts have been amended to increase the number of dual aspect units which is welcomed. Maisonettes are shown close to the boundary with Burgess Park and given that the boundary with the park is very overgrown and contains mature trees, maisonettes are considered to be appropriate. There should be sufficient separation distance to ensure that the trees would not result in unacceptably low levels of light into the accommodation, and consequent pressure from future occupiers for the trees to be pruned or removed. All new residential units should be designed to achieve good levels of internal daylight and sunlight in accordance with the BRE guidelines, and daylight calculations for the proposed residential units and amenity spaces would be required.

The submission advises that 10% wheelchair accommodation would be provided which would be policy compliant. Details as to which units would be adaptable and which would be fully accessible would be required, and the units should each have their own accessible parking space. Guidance can be found in the 2015 Technical Update to the Residential Design Standards SPD.

There are commercial / industrial uses surrounding the site and the scheme should be designed to ensure that future residential occupiers would not experience unacceptable noise and disturbance from these adjacent uses. The onus would be on the development to secure this, as a situation where future occupiers make noise complaints about legitimate activities taking place at long established commercial / industrial sites would not be acceptable. A noise report would be required which should include an assessment of weekend working / hours at the adjoining sites together with plant noise from the proposed employment / retail uses. A lighting study would also be required to establish whether any lighting from the adjoining industrial premises would cause light pollution to future occupiers. The development would need to provide any necessary mitigation, not the existing commercial occupiers.

Amenity impacts

Detailed existing and proposed block plans would be required showing the footprint of the neighbouring buildings together with their use; the window positions of any adjoining residential uses should be marked on the plans to enable officers to assess whether the proposed site layout would result in any loss of amenity. Care must be taken to ensure that the development would not hinder the development potential of any adjoining sites, and the updated mater plan shows how they could potentially be developed.

A daylight, sunlight and overshadowing study based on the BRE guidance should be carried out at the earliest opportunity allowing time for discussions with the local authority to address any issues in advance of a formal application. On the smaller part of the site on the north-western side of Parkhouse Street the buildings would have a close relationship with existing 2-storey houses, particularly 13 Parkhouse Street, and detailed information is required to enable officers to assess the potential impacts.

Trees and landscaping

There are a limited number of trees on the site including in front of 45 or 47 Southampton Way, along Park House Street, and along Wells Way. Valuable trees should be retained and protected during the course of construction, and a full arboricultural assessment and method statement would be required. Other than that the site is largely devoid of vegetation and opportunities should be taken to incorporate new tree planting and soft landscaping within the new development. As set out in the design section of the report this should include new street trees along Parkhouse Street and Wells Road, and the buildings would need to be set sufficiently far back to allow for this.

Transport

Parkhouse Street is a mixed residential and commercial road with a 20mph speed limit, and is within Controlled Parking Zone (CPZ) EC. The surrounding streets, including Southampton Way and Wells Way, are also part of CPZ EC. Directly north of the site is Burgess Park which provides links to the cycle route to central London and joins the north-south cycle superhighway (CS7) at Elephant and Castle. According to TfL's Planning Information Database, the site has a Public Transport Accessibility Level (PTAL) of 2 /3, which indicates a moderate to low level of accessibility, and the nearest bus stops are located approximately 3 -4 minutes walk away on Wells Way.

A transport statement would be required which must include trip generation information based on a development of similar size, operation and location. It should also consider the potential impact upon public transport.

Access and site layout - The eastern end of the new route through the site would be created close to the junction of Parkhouse Street close to Wells Way. Changes may be required to the existing junction, and a specific meeting to discuss highways requirements would be necessary. Details of the numbers and types of vehicles using the new route through the site and an indication of how this would be managed would be required.

Parkhouse Street is predominantly used for access to industrial sites and therefore has a high volume of freight traffic. Changes to the footway may be required for pedestrian road safety, and emergency access to the site, especially fire service requirements, would need to be agreed to determine the extent of access.

Car parking - The plans show 83 parking spaces which would be accessed from Parkhouse Street and Wells Way, although the arrangements are not sufficiently detailed for comment at this stage, including the appropriateness of the proposed number of spaces. An indication of likely car ownership levels should be provided, together with details of existing on-street parking stress based on the Lambeth methodology which would help to inform the best location for accessible parking. Future occupiers of the site would be prevented from obtaining a parking permit in the CPZ and each eligible occupier, including business occupiers, should be provided with 3 years free car-club membership or van club membership for the commercial uses.

Cycle parking - This would need to be provided in accordance with the London Plan standards. The preferred option would be for horizontal cycle parking such as 'Sheffield' stands at ground floor level, and separate stores for the commercial and residential uses. The proposed cycle parking should be secure, convenient and weatherproof in accordance with policy.

Servicing - Consolidating the servicing for the whole site at one location accessed from Parkhouse Street would be sensible. However, without a clearer understanding of the proposed operation of the commercial units it is not possible to assess how effective the servicing and delivery would be.

A servicing strategy and tracking drawings would need to be provided detailing what provision would be made to ensure that servicing would be safe and would not have harmful impacts on either vehicle or pedestrian safety. The tracking drawings should illustrate a worst case scenario i.e. for the largest delivery vehicle that could be used by a commercial operator or refuse collector. The servicing strategy should include the predicted number of vehicles to and from the site and the nature of those vehicles. The document should be prepared in accordance with Transport for London document "London Freight distribution plan: A Plan for London" and "Managing Freight

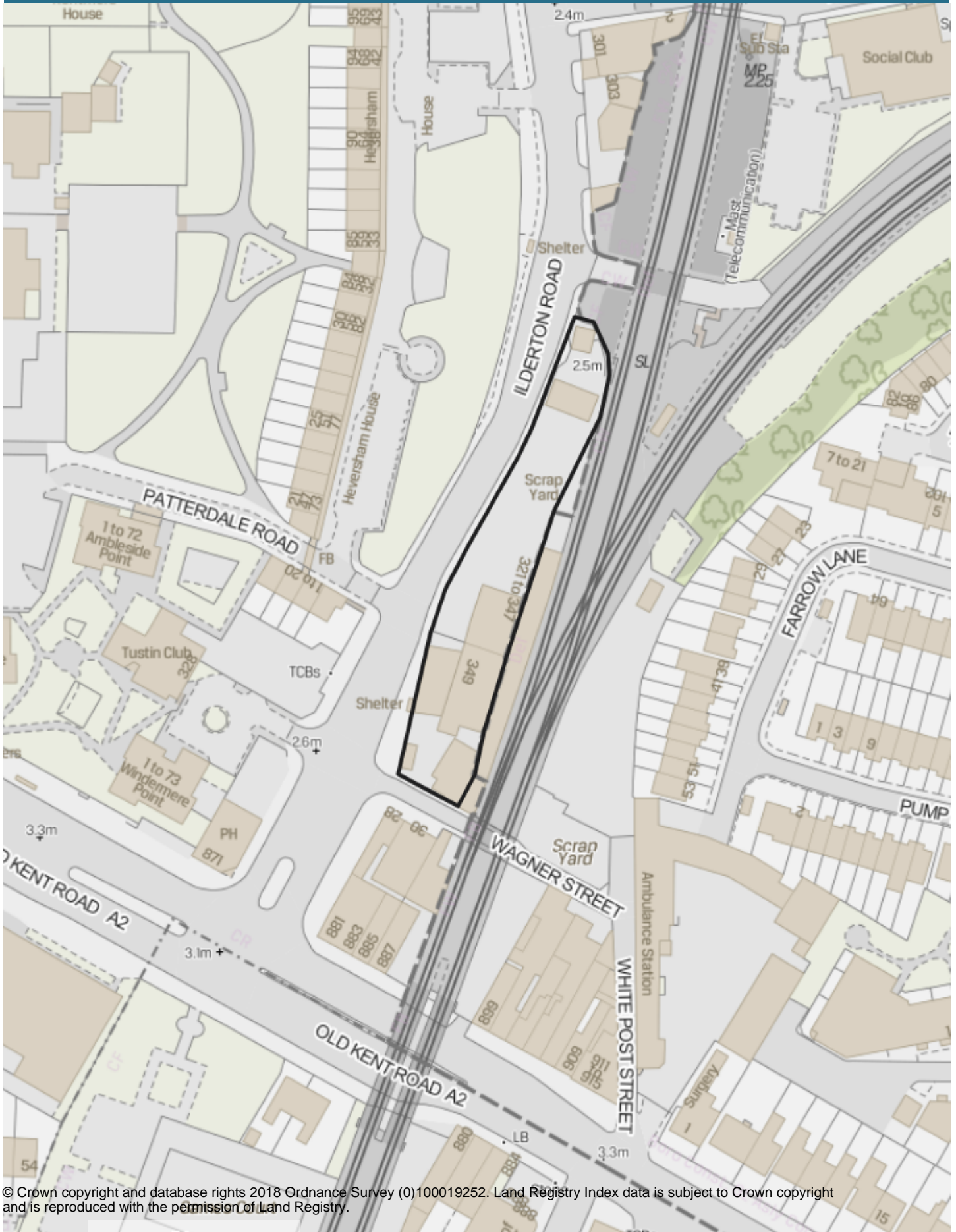
Effectively: Delivering and Servicing Plans”.

This advice is given to assist you but is not a decision of the Council. Further issues may arise following a formal planning application, where a site visit and public consultation and consultation with statutory consultees would be undertaken.

Please accept this letter as the closure of your current enquiry.

Yours sincerely

Simon Bevan
Director of Planning



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Scale = 1250

19-Nov-2018

Item No. 7.2	Classification: Open	Date: 27 November 2018	Meeting Name: Planning Committee
Report title:	<p>Development Management planning application: Application 17/AP/4819 for: Full Planning Application</p> <p>Address: LAND AT 313-349 ILBERTON ROAD, LONDON SE15</p> <p>Proposal: ORIGINAL DESCRIPTION Mixed use redevelopment comprising, demolition of existing buildings and construction of two buildings: one of part 11 and 13 storeys and one of part 13 and 15 storeys to provide 1,888sqm (GIA) of commercial floorspace (use class B1) at part basement, ground and first floors, 130 residential dwellings above (51 x 1 bed, 52 x 2 bed and 27 x 3 bed), with associated access and highway works, amenity areas, cycle, disabled and commercial car parking and refuse/recycling stores.</p> <p>REVISED DESCRIPTION Full application for full planning permission for mixed use redevelopment comprising: Demolition of existing buildings and construction of two buildings one of part 11 and 13 storeys and one of part 13 and 15 storeys to provide 1,661sqm (GIA) of commercial floorspace (use class B1) at part basement, ground and first floors, 130 residential dwellings above (44 x 1 bed, 59 x 2 bed and 27 x 3 bed), with associated access and highway works, amenity areas, cycle, disabled and commercial car parking and refuse/recycling stores.</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		Application Expiry Date	
Earliest Decision Date			

RECOMMENDATION

1. 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 27 April 2019;

- Referral to the Mayor of London.
 - Referral to the Secretary of State
2. In the event that the s106 agreement is not completed by 27 April 2019 that the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 167 of this report.

EXECUTIVE SUMMARY

3. This major application seeks to redevelop an existing light industrial and distribution site on the eastern side of Ilderton Road to provide a mixed-use commercial and residential development of 130 units and 1661sqm of B1 commercial floorspace. The scheme is located in a Strategic Preferred Industrial Location and would represent a departure from policy by virtue of proposing the introduction of residential accommodation to a Preferred Industrial Location.
4. The applicant has committed to providing 36% affordable housing by habitable rooms which equates to 46 affordable units, with a proposed tenure split of 70% social rented and 30% intermediate by habitable rooms. There would be the potential for a significant uplift in jobs on the site through the provision of good quality, flexible commercial space that has been specifically designed for B1 Use and would include units of varying size and improved servicing arrangements. There would be a small loss of 202sqm commercial floorspace as a result of the proposal that would be mitigated by an improved internal layout and public realm design, plus a financial contribution.
5. The proposal would include two buildings of up to 15-storeys in height and would be of a high quality of design, and deliver the master-planning and aspirations of the draft Old Kent Road Area Action Plan. A policy compliant mix of dwellings and wheelchair housing would be provided, together with a good standard residential accommodation. The daylight and sunlight impacts are noted, but it is considered that would only be limited harm caused to existing residential amenity as a consequence of the development. Sound proofing within the new dwellings would limit the potential for noise complaints against future commercial occupiers.
6. The proposal would be car free apart from 3 accessible parking spaces, and future occupiers would be prevented from obtaining parking permits on the surrounding streets. The proposed development should result in a reduction of two-way vehicular traffic. A s106 contribution would be required to improve local bus capacity.
7. The proposal would incorporate measures to reduce its carbon dioxide emissions, and a contribution to the Council's Carbon Off-set Green Fund would be secured through a s106 agreement. The proposal would be air quality neutral, and conditions are recommended to ensure that ground contamination, surface water drainage, archaeology and ecology would be adequately dealt with.
8. Overall, the clear benefits of the proposal are considered to outweigh the limited harm caused, and it is recommended that planning permission be granted, subject to conditions, a s106 agreement and referral to the GLA and Secretary of State.

BACKGROUND INFORMATION

Site location and description

9. The application site is roughly rectangular in shape and the combined area measures approximately 0.1974 acres (0.1974 hectares).
10. 313-320 Ilderton Road is currently in use as a tyre dealer's yard, Euro Tyres. 321-343 is occupied by leaflet distribution services business, LDS (Leaflet Distribution Services), specialising in the distribution of advertising material across the UK. 344-349 Ilderton Road is currently in use as a builder's merchant yard, Floyds Builders Merchant.
11. The site is bounded by Ilderton Road to the west, Wagner Street to the south and the railway viaduct and associated arches and embankment to the east. The surrounding area comprises a mixture of buildings used for industrial and commercial purposes and high density residential blocks on Tustin Estate. A church, the Redeemed Christian Church of God is located on the southern side of Wagner Street at 30 Wagner Street. The site is predominantly covered by one and two storey buildings, associated structures and yard space, with a high boundary wall fronting Ilderton Road and Wagner Street
12. The site is not located within a Conservation Area, nor is it within the setting of a Listed Building. It is not located within a protected borough view, but does fall within the background of London View Management Protected Vista of 2A.1, which protects views from Parliament Hill Summit to St. Paul's Cathedral. The borough boundary between Southwark and Lewisham runs along the eastern edge of the site. No part of the application site is located within Lewisham.

Details of proposal

13. The proposals involve demolition of all the existing commercial buildings and structures to allow for a mixed use building with employment and residential uses.
14. The employment uses would be provided at ground floor and first floor in the form of ten workspaces capable of use by small to medium sized enterprises, start up and creative type businesses within the B1 use class.
15. Overall, there would be slight decrease in the employment floorspace re-provision when compared to the existing provision as detailed below:

Table - employment provision

	Existing	Proposed	Difference
	338sqm floorspace	1661sqm floorspace	+1323sqm
	1783sqm yard area	260sqm yard area	-1523sqm
Total	2121sqm	1919sqm	-202sqm

16. It should be noted that the originally submitted scheme was policy compliant in terms of re-provision of floorspace (2148sqm). However, following discussions with officers to improve and amend the internal layout, increase the footway widths and improve the

elevational designs fronting Ilderton Road, the quantum of floorspace was reduced by these officer-requested design amendments to a non-compliant level.

17. It is officers' view that the scheme has been significantly enhanced by these improvements and the proposed quantum of floorspace is therefore considered acceptable in this instance and in relation to the design amendments achieved.
18. A financial contribution will be sought to mitigate this modest under provision of employment floorspace
19. In terms of residential provision, 130 new residential units which consists of 84 private units and 46 affordable units. The affordable units would be split between 31 units for social rent and 15 units intermediate/shared ownership.
20. The proposed affordable housing offer equates to a total of 136 habitable rooms or 36.4% of the 373 habitable rooms.
21. A 35% habitable rooms offer would equate to 130.6 affordable habitable rooms, with 70% social rent requiring 91.4 habitable rooms, and 30% Intermediate requiring 39.2 habitable rooms to be policy compliant.
22. The proposed 36.4% habitable rooms offer equates to 94 social rent habitable rooms and 42 Intermediate habitable rooms for a total of 136 affordable habitable rooms. The proposed offer would therefore exceed the 70/30 affordable tenure split for a policy compliant affordable housing offer.
23. The proposal consists of two linked buildings, one part 11 and 13 storeys and one of part 13 and 15 storeys that are linked by a two storey podium. Two small basements are proposed beneath the two residential cores.



Figure 1: CGI view of proposed scheme along Ilderton Road (north ward view^)



Figure 2: CGI view of proposed scheme along Ilderton Road (south ward view^)

24. Amenity space would be provided in the form of projecting private balconies, communal amenity space and children's play space.
25. The proposal would be car free apart from three accessible disabled parking spaces which would be introduced on the northern side of the site, accessible from Ilderton Road.
26. Servicing for the residential and commercial units would be from two new loading bays and increased width footways on Ilderton Road adjacent to the residential cores of the two proposed buildings. A repositioned bus stop is located between the two
27. Enhancements to the public realm are proposed in the form of new public open space, tree planting and the widening existing footways.
28. Additional supporting information was submitted during the course of the application in relation to affordable workspace and viability information was also submitted to support the delivery of 36% affordable housing.

Revisions to the scheme

29. Following discussions with officers, the proposed scheme was revised to optimise the use of site in relation to design and materials of the buildings' elevations, internal layouts, residential unit mix, ground floor street frontage, public realm, car parking and servicing. The amount of proposed commercial floorspace within the scheme reduced as a result of the negotiations with officers.
30. The scheme remains broadly consistent with the master-planning and massing identified within the Further Preferred Option of the Old Kent Road Area Action Plan

(AAP). The AAP also acknowledges the potential for additional height at the southern end of Ilderton Road at a scale similar in height to the existing towers of the Tustin Estate.

31. A second stage of statutory consultation was undertaken on the revised scheme.

Planning history

32. 12/AP/1936 Application type: Full Planning Application (FUL)
Construction of a new two storey building to accommodate replacement builders merchant shop (Use Class A1), office (Use Class B1) and storage (Use Class B8).
Decision date 14/09/2012 Decision: Granted (GRA)

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

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

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

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

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

Pre-application

33. A number of pre-application discussions were held on previous schemes and in relation to the current scheme now under consideration, the details of which are held electronically by the Local Planning Authority. The main matters discussed focused

on the layout of the site, employment uses, affordable housing, building heights and massing, and servicing.

Planning history of adjoining sites

180 Ilderton Road

34. 17/AP/4546

Planning permission granted subject to legal agreement on 21/03/2018 for:

Demolition of existing building and erection of a part 5, 8 and 9 storey plus basement mixed-use development (max height 29.98m) comprising 2,351 sqm (gia) of flexible workspace (Use Class B1) and 84 residential apartments (Use Class C3) with associated amenity space and ancillary infrastructure.

60a and 62 Hatcham Road and 134-140 Ilderton Road

35. 17/AP/3757

Planning permission granted subject to legal agreement on 6/11/2018 for:

Application for full planning permission for mixed use redevelopment comprising: demolition of existing buildings and construction of a building ranging in height from four to nine storeys to provide 1,179 sqm (GIA) of commercial space (use class B1) at ground floor, 86 residential dwellings above (30 x 1 bed, 39 x 2 bed and 17 x 3 bed), with associated amenity areas, cycle and disabled car parking and refuse/recycling stores.

1 White Post Street, Lewisham

36. DC/17/104772.

Planning permission to be determined for:

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

KEY ISSUES FOR CONSIDERATION

Summary of main issues

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

- Principle in terms of land use, including consideration of emerging policy for the Old Kent Road Opportunity Area;
- Environmental impact assessment;
- Affordable housing;
- Design issues, including height, scale and massing;
- Housing mix;
- Quality of accommodation;

- Impact upon the amenity of neighbouring residential and commercial occupiers and the surrounding area;
- Commercial workspace
- Transport issues;
- Impact on trees;
- Planning obligations (Section 106 Undertaking or Agreement);
- Sustainable development implications;
- Other matters

Planning policy

- 38.
- Old Kent Road Preferred Industrial Location -Strategic
 - Old Kent Road Action Area
 - Urban density zone
 - Archaeological priority zone
 - Air quality management area
 - Flood Risk Zone 3
 - Bermondsey Lake Archaeological Priority Zone

National Planning Policy Framework (the Framework)

39. 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'.
40. 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 49 - 54 of this report.

Section 1 - Building a strong, competitive economy

Section 4 - Promoting sustainable transport

Section 6 - Delivering a wide choice of high quality homes

Section 7 - Requiring good design

Section 8 - Promoting healthy communities

Section 10 - Meeting the challenge of climate change, flooding and coastal change

Section 11 - Conserving and enhancing the natural environment

Section 12 - Conserving and enhancing the historic environment

National Planning Policy Guidance (2014)

The London Plan 2016

41. 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 7.7 Location and Design of Tall and Large Buildings
 Policy 7.8 Heritage assets and archaeology
 Policy 7.21 Trees and woodlands
 Policy 8.2 Planning obligations
 Policy 8.3 Community infrastructure levy

42. 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.
43. 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.

Core Strategy 2011

44. 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) - Saved policies

45. 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.
46. 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
 3.19 – Archaeology
 3.20 – Tall Buildings
 3.28 - Biodiversity
 4.2 - Quality of residential accommodation
 4.3 - Mix of dwellings
 4.4 - Affordable housing
 4.5 - Wheelchair affordable housing
 5.2 - Transport impacts
 5.3 - Walking and cycling
 5.6 - Car parking
 5.7 - Parking standards for disabled people and the mobility impaired

Supplementary Planning Documents

47. 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)

Greater London Authority Supplementary Guidance

48. 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

49. 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)

50. 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.
51. 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 16 which covers the Hatcham and Ilderton Road area. Requirements for this allocation site include replacement of existing employment floor space, provision of housing and on-site servicing.

New Southwark Plan

52. 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.
53. 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.

54. 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.”

Principle of development

55. The site is located in the Preferred Industrial Location-Strategic (SPIL) which is an industrial location of strategic importance as identified in the Core Strategy and the London Plan. Introducing housing here would therefore represent a departure from the adopted Southwark and London Plan. The proposal also involves the loss of 202sqm of existing commercial floorspace, which would be contrary to strategic policy 10 of the Core Strategy and saved policy 1.2 of the Southwark Plan. Saved policy 5 is also relevant which encourages provision and replacement of small business units.
56. Strategic policy 10 of the Core Strategy states that the SPIL will be protected for industrial and warehousing uses. The Core Strategy does, however, recognise that structural changes in the economy are resulting in a declining need for industrial land in London. The Core Strategy also recognises that diversifying the range of job opportunities in the industrial locations into new sectors would benefit local people. Further, it sets out the future direction of Old Kent Road as a growth and regeneration action area, subject to a future area action plan (AAP).
57. Saved Southwark Plan policy 1.2 states that the only developments that will be permitted in SPILs are B class uses and other sui generis uses which are inappropriate in residential areas.
58. London Plan policy 2.17 seeks to promote, manage and where appropriate, protect the Strategic Industrial Land as London’s main reservoir of industrial and related capacity, which includes general and light industrial uses. It states that developments on Strategic Industrial Land should be refused unless they provide for broad industrial type activities, are part of a strategically co-ordinated process of SIL consolidation through an opportunity area planning framework, meet the needs of small to medium sized enterprises or provide for small scale ‘walk to’ services for industrial occupiers such as workplace crèches or cafes.
59. The London Plan designates the Old Kent Road as an opportunity area, with an

indicative capacity of 1,000 new jobs and a minimum of 2,500 new homes, which has been increased to a minimum of 12,000 in the merging London Plan. It identifies the potential for residential-led development along the Old Kent Road corridor, with homes and jobs targets to be explored and further refined through the preparation of a planning framework and a review of the Old Kent Road Strategic Industrial Location.

The Old Kent Road Area Action Plan (OKR AAP)

60. The emerging OKR AAP sets targets of a total of 20,000 new homes and 10,000 new jobs as well as new infrastructure, including parks and schools. It proposes the release of a substantial part of the Preferred Industrial Location designation to allow for the creation of mixed use neighbourhoods, so that new and existing businesses are designed to co-exist with new homes.
61. The OKR AAP places the site within the proposed Action Area Core, and within proposal site OKR 16 which covers the Hatcham Road and Ilderton Road area.
62. Emerging policy AAP6 of the OKR AAP states that development must retain or increase the amount of B Class floorspace on site, accommodate existing businesses on site or in the wider Old Kent Road Opportunity Area or provide relocation options for businesses that would be displaced by redevelopment and result in an increase in the number of jobs provided. It also requires the workspace to be managed by a specialist provider and for an element of affordable workspace to be provided.
63. Paragraph 216 of the NPPF states that weight can be afforded to relevant policies in emerging plans depending on the stage of preparation of the plan. The New Southwark Plan and Old Kent Road Area Action Plan have been subject to extensive consultation however they have yet to be subject to independent examination and therefore the documents have limited weight. They do, however, provide an indication of the direction of travel for planning policy in the opportunity area.
64. In determining whether the principle of the proposed development would be acceptable in land use terms, specifically the introduction of housing in the SPIL and the net loss of 202sqm of employment floorspace, Members need to consider whether the wider regeneration benefits of the scheme would outweigh any harm caused, and whether those benefits would therefore justify a departure from the adopted planning policy.
65. Officers consider that the key benefits arising from the proposal would be as follows.

Employment floorspace

66. The proposed scheme would deliver a 1661sqm of employment floorspace within a more efficient site layout that optimises the use of land across the site.
67. The employment uses would be provided at ground and first floor in the form of ten workspaces and associated yard area capable of use by small to medium sized enterprises, start up and creative type businesses.
68. The proposed commercial units fall within the B1 use class. To meet the policy requirements and to improve the likelihood of B1(c) occupiers leasing the units, it is recommended that the internal B1(c) fit out of the proposed commercial units would be

secured through condition and a clause in the Section 106 Agreement.

69. However, it is not considered necessary to limit the proposed workspace to B1(c) in this instance as the draft AAP recognises this site as appropriate for B1 (a), (b) and (c).

Job creation

70. The existing FTE employment levels on the site come to around 17 full time employees. The number of jobs generated within the proposed development has been calculated by applying the average job / floorspace ratio to the amount of floorspace proposed. (1,661sqm). This implies that the development would be expected to create between 40-157 direct jobs (FTE) allowing for a mix of a mix of B1 (a), (b) and (c). uses. This figure is calculated by applying the 'Managed Workspace' range set out in the latest Employment Density Matrix published by the HCA. This is an uplift of 23 and 140 FTE jobs.
71. Consequently, the scheme has the potential to generate a significant uplift in employment provision on site. The new workspaces would meet the needs of the SME and emerging creative sectors. This is a positive aspect of the proposal.
72. In addition to the direct operational employment, the retail, leisure and other expenditure of the residents of the proposed 130 dwelling units will support additional jobs in shops, restaurants and other services within the Old Kent Road area.
73. To mitigate the loss of 202 sqm of B class floorspace which would arise, a contribution of £1848.06 would be required towards skills and employment programmes in the borough, which in turn would help residents into employment. This has been calculated in accordance with the Council's Planning Obligations and CIL SPD and would be secured through the s106 agreement.

Business relocation and retention

74. The existing uses on the site are:
- 313-320 Ilderton Road
This part of the application site is currently in use as a tyre dealer's yard, Euro Tyres have a rolling lease and are working with Pedder commercial agents to secure their next move locally in south east London.
 - 321-343 Ilderton Road
This site is currently occupied by, LDS, a leaflet distribution services business specialising in the distribution of advertising material across the UK. LDS have a have a rolling lease and are also working with Pedder commercial agents to secure their next move locally in south east London.
 - 344-349 Ilderton Road
This part of the application site is currently in use as a builder's merchant yard. It is understood that the owner of Floyds Builders Merchants is willing to sell the site and is retiring.

75. Further details of the relocation and retention strategy will be secured by the legal agreement.

Affordable workspace

76. The applicant has agreed to provide an element of affordable workspace of 166sqm within the scheme comprising 10% of the commercial floorspace at rents of £12 per sq ft over a 15 year period. The rents would be subject to inflation over this time. The level of rent would make the space affordable to creative industries and businesses and ensure businesses that require low rents have the opportunity to lease space within the area.

Specialist workspace provider

77. The employment space has been designed to be flexible so that it could accommodate a range of different unit sizes and shared workspaces. The applicant has committed to managing the space themselves through their own established workspace management company. This can be secured through a section 106 planning obligation.

Provision of housing, including affordable housing

78. The scheme would provide 130 new residential units, including policy compliant affordable housing comprising social rented and intermediate units in terms of habitable rooms. There is a pressing need for housing in the borough. Policy 3.3 of the London Plan supports the provision of a range of housing and sets the borough a target of 27,362 new homes between 2015-2025. This is reinforced through Strategic Policy 5 of the Core Strategy which requires development to meet the housing needs of people who want to live in Southwark and London by providing high quality new homes in attractive areas, particularly growth areas. It would also be in accordance with emerging policy for the Old Kent Road Opportunity Area and the expectation of significant new housing provision.

Impact of the proposed residential use

79. It is recognised that the introduction of residential units could restrict and prejudice the operation of existing businesses in the area. Given the changing nature of the uses now carried out within the area, it is not felt that these businesses would be prejudiced and they could continue to operate and co-exist with the introduction of new residential uses provided schemes are well designed for this mix.
80. In addition the developer will provide, through an agreed S278 agreement, two new on street servicing bays that should ensure that this site has an improved servicing layout to accommodate a wide range of commercial users in the future without harming residential amenity or prejudicing those commercial uses. This is a key requirement of within the draft Area Action Plan and their provision is welcomed. Conditions are recommended in relation to noise and sound insulation within the building, and also in relation to servicing hours.
81. It is noted that residential accommodation within a mixed use context is already located within the immediate area. To the south of the site, residential units on Wagner Street with the Tustin Estate are located immediately opposite the site on the

western side of Ilderton Road.

Prematurity

82. The most up to date development plan pertinent to the Old Kent Road area is the 2016 London Plan. This identifies the Old Kent Road Opportunity Area as having significant potential for housing lead growth. The AAP has been developed in response to this adopted plan and has also sought to address the emerging policy position of the draft New London Plan including the increased housing target for the opportunity area and the need to ensure that the New London Plan aspirations for industrial land and employment are addressed. This scheme is not considered to undermine either the strategic or local plan making process, and reflects the adopted statutory development plan position of the 2016 London plan and the direction of travel of the draft New Southwark Plan and the 2016 and 2017 draft AAPs and the 2018 draft New London Plan. It is not therefore considered too be premature.

83.

Conclusion on land use

84. To conclude in relation to land uses, the proposed development would be contrary to strategic policy 10 of the Core Strategy owing to the introduction of residential into the SPIL would represent a departure from the adopted development plan.

85. This must therefore be weighed against the benefits of the scheme which include:

- the provision of housing, of which 36% would be affordable;
- Substantial re-provision of commercial floorspace, albeit at a small loss of 202sqm;
- the provision of good quality, flexible commercial space that has been designed to include units of varying scale, improved on street servicing for the commercial and residential space ;
- job creation;
- delivery of affordable workspace;
- Optimised use of the site.

86. The design of the commercial units and the flexibility they will offer is entirely consistent with the strategic and local policy objectives to provide workshops for small to medium sized enterprises, especially those in the cultural and creative industries.

87. Some limited weight can be attached to the NSP and OKR AAP at present, given that they have been subject of extensive consultation and the emerging policies would support the proposal. Given the changing character of the area, it is not felt that the introduction of housing would prejudice the operation of existing businesses in the area. In light of this officers consider that the principle of the proposed development in land use terms should be supported.

Environmental impact assessment

88. The applicant did not make a screening request to determine whether an Environmental Impact Assessment (EIA) is required in respect of the proposed development due to the size and scale of the proposed scheme. The proposed development would not constitute EIA development and accordingly does not need to

be supported by an Environmental Statement.

Affordable housing

89. 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. In accordance with Saved Policy 4.5 of the Southwark Plan, for every affordable housing unit which complies with the wheelchair design standards one less affordable habitable room will be required.
90. Saved Policy 4.4 of the Southwark Plan requires a tenure split of 70% social rented to 30% intermediate housing. This is reiterated in the draft Old Kent Road Area Action Plan.
91. In total, 373 habitable rooms would be provided in the development. The development would provide a total of 136 affordable habitable rooms which would equate to an overall provision of 36.4%. The level of provision is therefore acceptable and policy compliant. Viability information has been submitted which supports the delivery of the quantum of affordable housing proposed.
92. With regard to tenure split, the proposed affordable housing offer equates to a total of 136 habitable rooms or 36.4% of the 373 habitable rooms proposed.
93. A standard policy compliant 35% habitable rooms offer would equate to 130.6 affordable habitable rooms, with 70% social rent at 91.4 habitable rooms, and 30% Intermediate at 39.2 habitable rooms.
94. The proposed 36.4% habitable rooms offer would exceed the split of a standard policy compliant 35% habitable rooms offer with 94 social rent habitable rooms and 42 Intermediate habitable rooms.
95. In light of this the proposed offer would exceed the 70/30 affordable tenure policy requirement for a 35% policy compliant scheme.

Table: Affordable housing

Units	Social rent	Intermediate (shared ownership)	Total
1 bed	10	6	16
2 bed	10	6	16
3 bed	11	3	14
Total	31	15	46

96. Overall, the proposal would provide a total of 46 affordable units in a mix of unit sizes within the southern building (Core A), which is a positive aspect of the scheme. A Section 106 agreement is recommended to secure the delivery of these units, including a clause preventing more than 50% of the private units from being occupied until the affordable units have been completed.

Design issues, including height, scale and massing

97. 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 3.13 of the Southwark Plan asserts that the principles of good urban design must be taken into account in all developments which 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.
98. The emerging policy in the AAP sets out a vision for the Old Kent Road that would see substantial change in the area over the next twenty years, whilst seeking design that responds well to its existing character and sense of place. There are no conservation areas or listed buildings in the vicinity of the application site. The draft AAP does however identify buildings of townscape merit and architectural or historic interest around the site. None would be harmed by these proposals. Although proposal is considered a tall building, it is not considered that this proposal would result in any harm to designated London wide or local protected views, including the Protected Vista of 2A.1 of the London View Management Framework, which protects views from Parliament Hill Summit to St. Paul's Cathedral.

Height, Scale and Massing

99. The height of the buildings proposed marks a step change in the scale of development in the area, although not as tall as the towers on the adjacent Tustin Estate at circa 19 storeys, the height, scale and massing proposed is in line with the emerging policy set out in the draft AAP. At its highest point, the development under consideration here would be 51.575m high at the southern end of the site where the proposed building reaches 15 storeys. The building to the north reaches a height of 45.275m.
100. The form and massing approach is broadly supported by the GLA and the shallow footprint of the site allows potential for elegant building forms in views from the south and north of the site.
101. 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.
102. This massing proposal would result in a well articulated composition, responds positively to the shape of the site, its existing context, and potential future development around the site, as illustrated in the master-planning of the draft OKR AAP which indicates a Tier 3 tall building on this site to a height of approximately 50m.

The two distinct residential blocks also help to break up the perception of massing along Ilderton Road and allows for the podium level amenity space to be well naturally lit from the east and west

103. 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, and it is considered that the proposals would relate well to their surroundings, particularly at street level, with active frontages. The contribution that the scheme would make to local regeneration would be very significant in terms of mixed use development.
104. In terms of microclimate impacts, the results of the wind assessment for the proposed development indicate that no significant adverse effects are anticipated.
105. Public realm
106. The footways to Ilderton Road would be widened to create a comfortable setting for a building of this height, particularly where it is at its tallest, fronting onto Ilderton Road. A new piece of public open space of approximately 150sqm would be created adjacent to Wagner Street This piece of public realm would respond well to the activities planned for the ground floor of the proposed development. Its design would be secured by a landscaping condition.

Design Quality

107. The design proposed is of a high quality that responds well to the character of the surrounding context. The architectural language is primarily inspired by industrial buildings, resulting in an attractive, well proportioned building driven by the strong vertical columns and structural grid of the building. The windows would be a mix of aluminium windows, well in keeping with the aesthetic proposed. Windows of this nature are common in buildings around the application site. The rational, repetitive rhythm of the windows on each elevation, and the depth of the window reveals further contribute to the industrial aesthetic
108. Within this simple articulation, the building would have a clear, but subtly differentiated hierarchy of 'base', 'middle' and 'top', with different elevation details to separate the blocks into distinctive massings. This proposed articulation ensures comfortable proportions and a clear articulation of the mix of uses proposed.
109. The 'base' of the building, that includes the ground and first floors is defined by a continuous horizontal banding that splits the change in function from commercial use to residential uses above. The high floor to floor ceiling heights create a legible commercial frontage with opportunities for signage and activity along the length of the building. Regular rhythms of brick vertical columns meet the ground to create a colonnade with inset bays to Ilderton Road that enables wider footways and defensible space for the commercial units.
110. The 'middle' would feature a clear rhythm of windows and balconies, with predominant vertical bands of brickwork interlaced with horizontal and vertical bays of dark grey rain cladding and glass balconies inset into the brickwork.
111. The 'top' would be expressed with a mix of brick detailing and subservient pavilion

style additions clad in dark grey rain cladding.

Materials

112. A brick language is proposed for the building in response to the character of the surrounding area. This would consist predominantly of dark brown and light cream/white brick elevations to create a separation between the elements of the massing, interest with dark grey rainscreen cladding.
113. Dark grey aluminium window frame, dark grey aluminium curtain walling to commercial units and aluminium louvers matching the commercial units curtain walling are proposed for the commercial units. The detailed design of all windows will be secured by condition, as will the fit of the commercial units. The recessed and protruding balconies would be enclosed by glass balustrades
114. These materials, along with the details described above are considered an appropriate response to the existing character of the area and the emerging architectural language proposed in the draft OKR AAP. Detailed drawings and material samples will be required by condition in order to ensure that this quality of design is delivered.

Conclusion on design

115. The building would be of an appropriate height and scale and accordingly considered acceptable. The design quality, and use of brick would ensure that a high quality of finish would be achieved. Conditions are recommended in relation to detailed design and material samples.

Housing mix

116. Strategic Policy 7 of the Core Strategy 'Family homes' requires developments of 10 or more units to provide at least 60% 2+ bedroom units and 20% 3+ bedroom units. No more than 5% studio units can be provided and these can only be for private housing. At least 10% of the units should be suitable for wheelchair users.

Table 2: Unit mix

	Total number units (number)	Total Units (%)
Studios	0	0%
1 bed	44	34%
2 bed	59	45%
3 bed	27	21%
Total units	130	100%

117. 65% of units would have two or more bedrooms; this meets the 60% target and is therefore acceptable. 20% of the units would have three or more bedrooms, which is policy compliant. No studios are proposed. Thirteen wheelchair units (13%) would be provided, with a proportional distribution of wheelchair units between tenures and blocks (Core A and B). This is considered broadly acceptable.
118. In summary the housing mix would be in accordance the relevant policy.

Density

119. Policy 3.4 Optimising Housing Potential of the London Plan states that development should optimise housing output for different types of location within the relevant density range shown in Table 3.2 of the Plan. It also requires local context, the design principles and public transport capacity to be taken into account. Strategic Policy 5 – Providing new homes of the Core Strategy sets out the density ranges that residential and mixed use developments would be expected to meet.
120. As the site is located within the Urban Zone, a density range of 200 to 700 habitable rooms per hectare would be sought. Appendix 2 of the saved Southwark Plan sets out guidance for how density should be calculated. In order for a higher density to be acceptable, the development would need to meet the criteria for exceptional design as set out in section 2.2 of the Residential Design Standards SPD.
121. The development as a whole would have a density of 2,157 habitable rooms per hectare. Since the maximum upper limit of 700hrh would be significantly exceeded, the development would need to demonstrate that it would be excellent in relation to housing quality. If it can be demonstrated that an excellent standard of accommodation would be provided, makes an exceptional contribution to the regeneration, and the response to context and impact on amenity to existing occupiers is acceptable, then it is considered that the high density in this Opportunity Area location would not raise any issues to warrant withholding permission. This is considered in the following paragraphs.

Quality of accommodation

122. Saved Policy 4.2 of the Southwark Plan advises that planning permission will be granted provided the proposal achieves good quality living conditions. The standards in relation to internal layout are set out in the adopted Residential Design Standards SPD 2011 and include guidance on overlooking standards as well as requiring the predominance of dual aspect accommodation.

Aspect

123. 71% of the proposed 130 units would be dual aspect. Single aspect units would all be west facing across Ilderton Road and Tustin Estate. No north facing single aspect units are proposed. All of the three bed units would be a dual aspect.

Unit sizes

124. All of the proposed units would satisfy the minimum floor areas set out in Southwark's Residential Design Standards SPD, alongside good floor to ceiling heights and glazing. All kitchen units would be naturally ventilated and lit. Bathrooms and toilets would be artificially lit and ventilated, but this isn't uncommon in flatted developments. Accordingly, this aspect of the scheme is also policy compliant.

Internal daylight within the proposed residential units

125. A daylight and sunlight report and addendum based on the Building Research Establishment (BRE)

Daylight

126. Guidance has been submitted which considers daylight to the proposed dwellings using the Average Daylight Factor (ADF). ADF is a measure of the overall amount of diffuse daylight within a room. It is the average of the daylight factors across the working plane within a room. This equates to the ratio of the average illuminance across the working plane, to the illuminance due to an unobstructed sky. ADF determines the natural internal light or 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. This also adopts an ADF of 2% for shared open plan living room/kitchens/dining.
127. The assessment of daylight to the main habitable spaces within the proposed accommodation showed that all the rooms tested achieve the recommended ADF value for their particular rooms use, the majority very comfortably. The analysis demonstrates that daylight amenity within the proposed residential accommodation will be very good and in full accordance with BRE guidance.

Overlooking

128. There would be some opportunities for overlooking between habitable windows of residential units within the scheme between the two buildings; however they would be separated by the landscaped podium amenity space which is 19m wide. This degree separation is considered to avoid any harmful overlooking.

Amenity and play space

129. All new residential development must provide an adequate amount of useable outdoor amenity space. The Residential Design Standards SPD sets out the required amenity space standards which can take the form of private gardens and balconies, shared terraces and roof gardens. Policy 3.6 of the London Plan requires new developments to make provision for play areas based on the expected child population of the development. Children's play areas should be provided at a rate of 10sqm per child bed space (covering a range of age groups). The emerging OKR AAP requires 5sqm of public open space per dwelling as per AAP 10.
130. The following amount of amenity space would need to be provided:
- For units containing 3 or more bedrooms, 10sqm of private amenity space as required by the SPD;
 - For units containing 2 bedrooms or less, ideally 10sqm of private amenity space, with the balance added to the communal space;
 - 50sqm communal amenity space per block as required by the SPD;
 - 10sqm of children's play space for every child space in the development as required by the London Plan;
 - 5sqm of public open space per dwelling as required by the OKR AAP. If it is not feasible to deliver the open space on site, a financial contribution will be required.

Private amenity space

131. In this case, a total of 1300sqm of amenity space would need to be provided between the 130 units. In this instance 1092sqm of private amenity space is proposed, however

all flats have been provided with private amenity space in the form of balconies, which is a positive benefit of the scheme. The schedule of amenity space is:

- 35 units provide 10sqm or more of private amenity space, including all 3 bed units.
- 41 units between 7 and 9sqm.
- 51 units between 5 and 6sqm

132. Where the full recommended provision of 10sqm per residential unit has not been provided, the shortfall has been added to the communal requirement. The identified shortfall is 208sqm of private amenity space.

Communal amenity space

133. A total of 562sqm of communal amenity space is proposed in two roof level gardens which will be conditioned for detailed design. A total of 1350sqm of amenity space is required for the scheme which includes the 50sqm communal amenity space. The proposed private amenity space combined with the proposed communal amenity space would deliver a total amenity space of 1654sqm. This would exceed the total requirement plus the shortfall of 208sqm of private amenity space, and is therefore acceptable.

Children's amenity space

134. In line with the Mayor's Providing for Children and Young People's Play and Informal Recreation SPG the development would be required to provide 429sqm of children's play space. An area of this play space has been provided as part of the communal area which goes part way to meet this requirement. However a shortfall of 304sqm is recognised, which would require a financial contribution of £45,904.00. This contribution will be secured by Section 106 agreement.

135. Further design details of the proposed play space within the scheme will be secured by condition.

Public open space

136. Policy AAP10 of the emerging OKR AAP requires the provision of 5sqm of public open space per dwelling which equates to 650sqm for the scheme. A 150sqm of public open space is proposed at the southern end of the site fronting Wagner Street. As such, there is a shortfall of 500sqm that cannot be provided on site which will be secured by a financial contribution.

137. Although this policy currently has limited weight, the applicant has agreed to make the contribution of £102,500 based on the 130 dwellings proposed (at a cost of £205 per sqm as set out in the section 106 SPD) which could go towards off site delivery of a new park to the north of the site, and can be secured by the legal agreement.

Noise

138. The site is located within the SPIL, and the proposed residential units would adjoin existing commercial units to the east, south and north, although these sites may come forward with similar mixed schemes. The railway line and associated arches is located

immediately to the east of the site. An environmental noise assessment has therefore been undertaken to assess whether the site would be suitable for residential development. The report has been reviewed by the Council's Environmental Protection Team (EPT) and a condition to secure appropriate internal noise levels is recommended, which should minimise the likelihood of noise complaints against the existing industrial occupiers. This should be capable of being achieved with robust glazing.

Conclusion on quality of accommodation

139. The proposed development would provide well lit and well ventilated homes that meet the space requirements of the Residential Design Standards. Sufficient private, shared communal and children's play space has been provided meeting the minimum requirements. The quality of accommodation is therefore considered to justify the high density of the scheme. Section 106 payments have been secured for public open space which can go towards the delivery of open space elsewhere since it is not possible to provide this on site.

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

140. 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 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.

Daylight and Sunlight impact to existing residential units

141. A daylight and sunlight impact assessment was submitted with the planning application to assess the impact on nearby existing residential properties. The assessment utilised the following methodologies:

No-Sky Line (NSL)

142. NSL is a measure of the distribution of daylight within a room. It maps out the region within a room where light can penetrate directly from the sky, and therefore accounts for the size of and number of windows by simple geometry.
143. The BRE suggest that the area of the working plane within a room that can receive direct skylight should not be reduced to less than 0.8 times its former value (i.e. the proportional reduction in area should not be greater than 20%).

Vertical Sky Component (VSC)

144. VSC is a measure of the direct skylight reaching a point from an overcast sky. It is the ratio of the illuminance at a point on a given vertical plane to the illuminance at a point on a horizontal plane due to an unobstructed sky. For existing buildings, the BRE guideline is based on the loss of VSC at a point at the centre of a window, on the outer

plane of the wall. The BRE guidelines state that if the VSC at the centre of a window is less than 27%, and it is less than 0.8 times its former value (i.e. the proportional reduction is greater than 20%), then the reduction in skylight will be noticeable, and the existing building may be adversely affected.

145. Therefore, it is important to ensure the retained daylight levels are good and commensurate with the urban location. Inevitably this leads to retained daylight (VSC) levels that are less than 27% but are in line with those typical of central urban areas. The applicant considers a VSC target of 18% appropriate for this location.

Annual Probable Sunlight Hours (APSH)

146. In relation to sunlight, the BRE recommends that the APSH received at a given window in the proposed case should be at least 25% of the total available, including at least 5% in winter. Where the proposed values fall short of these, and the absolute loss is greater than 4%, then the proposed values should not be less than 0.8 times their previous value in each period (i.e. the proportional reductions should not be greater than 20%). The BRE guidelines state that *'...all main living rooms of dwellings, and conservatories, should be checked if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are less important, although care should be taken not to block out too much sun'*. The APSH figures are calculated for each window, and where a room is served by more than one window the contribution of each is accounted for in the overall figures for the room. The acceptability criteria are applied to overall room based figures.

147. The neighbouring residential units that have the potential to be impacted in terms of daylight and sunlight are located at:

- 7 to 21 Farrow Lane
- 23-53 Farrow Lane (odd)
- 899-915 Old Kent Road (odd)
- 881-887 Old Kent Road (odd)
- 28 Wagner Street
- 871 Old Kent Road
- 1 to 73 Windermere Point
- 1 to 72 Grasmere Point
- 1 to 72 Ambleside Point
- 1 to 20 Heversham House
- 21 to 84 Heversham House

148. The figure below illustrates the location of these existing residential properties:



Figure 3: Neighbouring residential properties

7 to 21 Farrow Lane

149. These flats are located to the east of the site across the railway way line in Lewisham.

Daylight

150. The majority of windows serving these properties comfortably achieve the BRE VSC criteria. Only two windows are not fully compliant with BRE guidance. These windows (W3/10 and W5/11) experience proportional reductions of 0.79 (21%) and 0.78 (22%) respectively. The retained VSC values are therefore very marginally less than 0.8 times the existing values, and therefore marginally below guidance. Both of the rooms that these windows serve are also served by another window that will experience negligible reductions. The overall effect on the rooms will therefore be very limited.
151. Considering NSL, all rooms achieve BRE guidance, with the majority not experiencing any reduction. The daylight reductions to these flats will not be material, and they will continue to receive very good amenity after development.

Sunlight

152. The impact on these flats is minimal, and fully complies with BRE Guidance. Sunlight amenity to the property will remain very good after the proposed scheme is implemented.

23-27 Farrow Lane (odd)

153. These properties are located to the east of the site across the railway way line in Lewisham.
154. It is assumed that the 2 ground floor windows to each of these properties both serve the same room, and that the 2 first floor windows serve two separate rooms. It

appears likely that the smaller first floor windows serve bathrooms, and although figures were presented for these, if this is indeed the case then they would in fact not be material for assessment.

Daylight

155. Considering NSL, while the first floor rooms experience larger reductions, proportional reductions to all the ground floor rooms in these properties fully accord with BRE guidance. While proportional reductions in VSC are between and 0.8 (20%) and 0.74 (26%), i.e. marginally in excess of BRE guidance, retained values remain very good, particularly so for an urban location. All windows will retain VSC values in excess of 23%, with the majority retaining values of over 25%. The overall reduction in daylight amenity to these properties is very limited

Sunlight

156. As none of the potentially impacted windows are orientated within 90 degrees of south, sunlight is not an issue.

29-53 Farrow Lane (odd)

157. These properties are located to the east of the site across the railway way line in Lewisham. It is assumed that the 2 ground floor windows to each of these properties both serve the same room, and that the 2 first floor windows serve two separate rooms. It seems likely that the smaller first floor windows appear to serve bathrooms, and although figures were presented for these rooms, if this is indeed the case then they would in fact not be material for assessment.

Daylight

158. Considering NSL, while the first floor rooms experience larger reductions, proportional reductions to all the ground floor rooms in these properties fully accord with BRE guidance. Proportional reductions in VSC to the windows serving these properties are in the region of 0.74 to 0.64. While these reductions are in excess of default BRE guidance, and consequently may be noticeable to the occupants, retained VSC values remain good. With the exception of window W4/40 which retains a VSC of 17.89%, all windows will retain a VSC in excess of 18% after development, with over 80% retaining a value in excess of 21%.
159. Daylight amenity to all these properties will therefore remain good after development, and the impacts should be regarded as acceptable, particularly in the context of the urban location.

Sunlight

160. As none of the potentially impacted windows are orientated within 90 degrees of south, sunlight is not an issue.

899-915 Old Kent Road (odd)

161. These properties are located to the south east of the site, across the railway line and Wagner Street. While there are retail units at ground floor, from site inspection there

appears to be residential accommodation above.

Daylight

162. Reductions in daylight to all the windows and rooms in these properties fully accord with the BRE VSC and NSL criteria respectively. There will therefore not be a material reduction in daylight to these properties, and each will continue to retain good amenity after development.

Sunlight

163. As the Application Site is located to the north of these properties, sunlight is not an issue.

881-887 Old Kent Road (odd)

164. These properties are located to the south of the site, behind 28 and 30 Wagner Street. While there are retail units at ground floor, from site inspection there appears to be residential accommodation above.

Daylight

165. Reductions in daylight to all the windows and rooms in these properties fully accord with the BRE VSC and NSL criteria respectively. There will therefore not be a material reduction in daylight to these properties, and each will continue to retain good amenity after development.

Sunlight

166. As the Application Site is located to the north of these properties, sunlight is not an issue

28 Wagner Street

167. This property is located to the south of the site across Wagner Street.

Daylight

168. Considering NSL, 3 of the 4 potentially impacted rooms in this property will experience reductions that are very marginally in excess of BRE guidance. One first floor room will experience a slightly larger reduction. Proportional reductions in VSC to the windows serving these properties are in the region of 0.59 to 0.56. While these reductions are in excess of default BRE guidance, and consequently may be noticeable to the occupants, retained VSC values remain good. All windows will retain a VSC between 18.6% and 21.9% after development.
169. Daylight amenity to the property will therefore remain good after development the impact is considered acceptable, particularly in the context of the urban location.
170. It should be noted that this property will also receive improved amenity in terms of outlook, as it would front the new public open space on the northern side of Wagner Street.

Sunlight

171. As the Application Site is located to the north of this property, sunlight is not an issue.

871 Old Kent Road

172. This property is a bar and restaurant at ground floor level, with a flat at first floor level. It appears that there is one main habitable room, served by 2 windows, that could potentially be impacted by the proposal.

Daylight

173. While the proportional reduction in VSC to window W7/321 is marginally in excess of guidance, the reduction to the main window serving the space, W6/321, is well within guidance. Retained VSC values to these windows are 25.19% and 30.87% respectively. This is an extremely good level of daylight irrespective of location.
174. Considering NSL, there will be no reduction. There will therefore not be a material reduction in daylight to this property and it will continue to retain excellent amenity after development.

Sunlight

175. As the Application Site is located to the north of this property, sunlight is not an issue.

1 to 73 Windermere Point

176. These flats are located to the west of the Application Site across Ilderton Road and form part of the Tustin Estate.

Daylight

177. The proportional reductions in VSC to the vast majority of windows serving these flats fully accord with BRE guidance. There are 10 windows that will experience slightly larger reductions. 7 of these are small, secondary windows to the rooms they serve, with the primary windows very comfortably achieving guidance. The overall effect on the daylight amenity to these rooms is therefore very limited.
178. The remaining 3 windows (W6/351, W9/352 and W9/353) are located under balconies that restrict their accesses to direct skylight. In situations such as this the BRE suggest that another calculation is carried out with the obstruction overhead removed. If the proportional reduction is in excess of guidance with the balcony in place, but achieves guidance with it removed, this demonstrates that it is the presence of the balcony, rather than the size of the new obstruction, that is the main factor in the relative loss of light.
179. Considering the figures, with the balconies in place the proportional reductions are marginally in excess of guidance. With the balcony effect removed the proportional reductions are well within guidance. The reductions here are therefore in full accordance with BRE guidance.

180. Considering NSL, none of the rooms experience any reduction.
181. Overall, the reductions in daylight to these flats are small, and they will all continue to receive very good daylight amenity after development.

Sunlight

182. Reductions in APSH to these flats fully accord with BRE guidance. The properties will continue to receive very good sunlight amenity after development.

1 to 72 Grasmere Point

183. These flats are located to the west of the Application Site across Ilderton Road and form part of the Tustin Estate.

Daylight

184. Reductions in daylight to all the windows and rooms in these properties fully accord with the BRE VSC and NSL criteria respectively. There will therefore be a very limited reduction in daylight to these properties, and each will continue to retain good amenity after development.

Sunlight

185. Reductions in APSH to these flats fully accord with BRE guidance. The properties will continue to receive very good sunlight amenity after development.

1 to 72 Ambleside Point

186. These flats are located to the west of the Application Site across Ilderton Road and form part of the Tustin Estate.

Daylight

187. Reductions in daylight to all the windows and rooms in these properties fully accord with the BRE VSC and NSL criteria respectively. There will therefore not be a material reduction in daylight to these properties, and each will continue to retain good amenity after development.

Sunlight

188. The reductions in APSH to the vast majority of rooms within these flats fully accord with BRE guidance. While there are 5 rooms that are below guidance, in each case this is due to a small reduction in winter sunlight. This is not unusual in an urban location, for example, in midwinter the sun's maximum elevation is around 15 degrees above the horizon, and this is lower than a typical urban skyline. In each case the room will still receive over the recommended 25% of total APSH after development. The reductions in sunlight amenity to these flats are limited, and they will continue to receive very good levels of sunlight after development.

1 to 20 Heversham House

189. These flats are located to the west of the Application Site across Ilderton Road.

Daylight

190. Reductions to the 5 south facing windows assessed (W5/441, W5/442, W5/443, W5/444 and W5/445) are small and in full accordance within BRE guidance. Each will retain a VSC in excess of the default BRE target of 27% after development.
191. The remaining windows are all located under external walkways that restrict their access to direct skylight. In situations such as this the BRE suggest that another calculation is carried out with the overhead obstruction removed. If the proportional reduction is in excess of guidance with the overhead obstruction in place, but achieves guidance with it removed, this demonstrates that it is the presence of the balcony, rather than the size of the new obstruction, that is the main factor in the relative loss of light. Considering the VSC figures with the walkway effect removed, reductions to all windows at 2nd floor level and above accord with guidance. The proportional reduction to the 1st floor windows are marginally in excess of guidance. The retained VSC values with the walkway effect removed (i.e. the level of daylight reaching the façade of the building) are all in excess of 22%. This is a good level of daylight, particularly so for an urban location. Overall the impact on daylight is limited.
192. Considering NSL, none of the rooms will experience any reduction.
193. Overall reductions in daylight amenity to this property are small and accord with BRE guidance.

Sunlight

194. The reductions in APSH to all windows are small and in full accordance with guidance.

21 to 84 Heversham House

195. These flats are located to the west of the Application Site across Ilderton Road.

Daylight

196. Considering NSL, reductions to over 75% of the potentially impacted rooms are within BRE guidance. Proportional reductions to the remaining rooms are in the region of 0.79 to 0.62 (21% to 38%). While these reductions are in excess of default BRE guidance, and consequently may be noticeable to the occupants, retained VSC values remain good.
197. Considering VSC, many of the windows are recessed into the building and have their access to direct skylight restricted by walkways and overhanging massing above. Removing the effect of these walkways and overhangs in line with BRE guidance, reductions to over half of the windows fully accord with the guidelines. Proportional reductions to the remaining windows are in the region of 0.69 to 0.58 (31% to 42%) Considering the retained VSC values with the walkway and overhang effect removed (i.e. the level of daylight reaching the façade of the building) are all in excess of 21%. This is a good level of daylight, particularly so for an urban location.
198. Daylight amenity to all these flats will therefore remain good after development, and

the impacts should be regarded as acceptable, particularly in the context of the urban location.

Sunlight

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

Conclusion on daylight and sunlight impacts to existing residential units

200. A detailed daylight sunlight assessment has been undertaken in relation to all neighbouring residential properties in accordance with the BRE guidelines on daylight and sunlight.
201. It should be noted that the existing site massing is modest, and therefore some noticeable proportional reductions will be inevitable with any scheme that optimises the full potential of the site. However, as has been held on Appeal, noticeable is not to be equated with unacceptable.
202. While reductions in amenity to many of the properties assessed fully comply with the default BRE criteria, there will be noticeable impacts to some properties as set out above. However, in each case these are limited and considered to be reasonable in this context. The limited impact is regarded as acceptable.

Daylight and Sunlight impact to emerging residential units

203. In terms of emerging schemes, a mixed use scheme on the eastern side of the railway viaduct at 1 White Post Street within Lewisham has been submitted to Lewisham Council for determination. Application Reference – DC/17/104772. The description for this development is:

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

204. This planning application has yet to be determined by Lewisham Council.
205. An objection was received from the applicant for the 1 White Post Street scheme regarding the potential daylight and sunlight impacts to the proposed residential units. As such, an addendum was prepared to assess the retained levels of daylight within both proposed developments assuming that both are implemented.

The assessment showed that all the rooms assessed will achieve the ADF target values for their principal room use, the majority very comfortably. Daylight amenity within both proposed developments will therefore remain very good after both are implemented.

Overlooking

206. In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear. These distances are all met in terms of the impact of the proposal on adjacent buildings.
207. In relation to adjoining sites the proposed scheme is approximately 25 metres away from 1-20 Heversham House and approximately a minimum of 35 metres away from 21-98 Heversham House on the Tustin Estate, approximately 25 metres away from the emerging mixed use scheme at 1 White Post Street and approximately 15 metres from the properties at 28-30 Wagner Street. These degrees of separation when considered with the orientation of the flats are considered to avoid any harmful overlooking.

208. Outlook

209. It is considered that the proposed development will provide an improved outlook for nearby residential properties as the scheme would place a site that does not enhance the street townscape and is partly in a poor condition. New public realm and wider footways would enhance the existing poor quality of public realm. While the boundary wall and fences would be replaced with active frontages that encourage, increased footfall and use of the site.

Air quality

210. The site is located in an Air Quality Management Area and an Air Quality Assessment has been submitted, which considers the air quality impacts arising from the construction and use of the development.
211. The Council's Environmental Protection Team (EPT) has reviewed the submission and advised that they will require the emissions during the construction phase to be controlled by measures contained with a Construction Management Plan. Such a plan should details of continuous monitoring for dust and noise. It is recommended that this plan be requested by condition.
212. The proposed development will meet building and transport emission benchmarks in terms of air quality neutrality. As such, no mitigation measures are required to reduce these emissions.

Transport issues

213. Core Strategy Strategic Policy 2 encourages walking, cycling and the use of public transport rather than travel by car. Saved policy 5.2 of the Southwark Plan seeks to ensure that developments do not result in adverse highway conditions; 5.3 require that the needs of pedestrians and cyclists to be considered and 5.6 establishes maximum parking standards.

Accessibility

214. The site has a PTAL (public transport accessibility level) of 4 (moderate) and is not located in a controlled parking zone (CPZ). It is within 75m from the junction of the Old Kent Road and Ilderton Road. There are two bus stops within the vicinity of the site. The Old Kent Road is less than 100 m from the site providing access to further bus services.
215. The proposal includes convenient pedestrian access points around the whole development. The building has been set back to allow the existing footway along the western boundary of the site to be widened as a part of the development proposals and this will benefit the pedestrian permeability throughout the local area.

Servicing

216. The site currently has five vehicular accesses on Ilderton Road and one at the south of the site on Wagner Street. The proposal is to return 4 crossovers to footway and have a single vehicle access off Ilderton Road at the northwest corner which leads to 3 disabled car parking spaces. Two loading bays on Ilderton Road are proposed that are close to the entrances to the residential and commercial entrances. Public highway improvements to be agreed and implemented within an S278 works.
217. Considering the site constraints, the applicant in negotiations with officers, has considered how to best service the proposed residential and commercial land uses on the site. The proposed servicing arrangements are considered to be effective for the proposed residential and commercial land uses on the site, especially the B1 land uses in terms of proximity of loading bays to entrances and internal goods lifts between ground and first floor commercial units.
218. Sufficient information has been provided to demonstrate the development is unlikely to have an effect on the local highway network compared to that of the existing industrial use. The trip generation of the proposed development has been estimated with reference to data from the TRICS database for the residential and commercial land uses assessed using 'worst case' scenario. The proposed development should result in a reduction of two-way vehicle trips per day from 184 to 42 which are in excess of 70%. Also the existing trips are related to 14 tonne plus vehicles due to the nature of the businesses. A reduction in individual large vehicles is generally positive for the area, however there will still be commercial trips that are required to service the commercial uses. All public transport trips combine a pedestrian element. So actual pedestrian trips to and from site will be in excess of 89% of trips.
219. It was noted during site visits by officers that the existing uses on site currently have a poor servicing arrangement in terms of the access to and from the highway with vehicles using the highway for loading and unloading.
220. The detailed design of these servicing facilities would be secured by condition and legal agreement.



Figure 4: Ground floor plan of proposed scheme

221. In order to ensure that on-street servicing and deliveries do not negatively impact on the highway network, the Council is recommending that applicants in the Old Kent Road Opportunity Area enter into Delivery Service Plan Bonds against their baseline figures for all daily servicing and delivery trips. These bonds would be calculated at £100 per residential unit and £100 per 500 sqm non-residential floorspace. In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, this is not intended as a financial penalty, but as a means of mitigating any harmful impacts from the proposed development and ensuring a better quality of life for current and future residents. As such, it is considered to meet the CIL Regulations 122 test, in that it would be:

- (i) necessary to make the development acceptable in planning terms;
- (ii) directly related to the development; and
- (iii) fairly and reasonably related in scale and kind to the development.

222. The bond with the council against its own baseline of daily trips for the servicing and delivery of the development. The proposal is for the management of the new development to monitor the daily vehicular activity of the site both commercial and residential, quarterly for a period of 2 years from 75% occupancy. If the site meets or better its own baseline target the bond will be returned within 6 months of the end of the monitoring period. If the site fails to meet its own baseline the bonded sum will be made available for the council to utilise for sustainable transport projects in the ward of the development. The council will retain £1,600.00 for assessing the quarterly monitoring.

223. The bond is currently estimated to be:

Residential (£100 per unit)	130	£13,000
Non-residential floorspace (£100 per 500m ²)	1,661sqm	£300

Total		£13,300.00
Daily servicing/delivery vehicles baseline	Tba	

224. Servicing and Deliveries for the development can include:

- Postal deliveries;
- On-line grocery deliveries to residential units;
- Amazon/argos type deliveries
- Fast food home deliveries
- Private hire vehicle pick ups and drop offs
- Weekly refuse collection by LBS;
- Weekly recycling collection by LBS;
- Courier deliveries / collections; and
- Facilities Management

Car parking

225. Proposal is car free with the exception of on-site provision for three disabled bays and one servicing bay this is appropriate at this location reflecting average car ownership levels in the area also there are three car club bays within a 10-minute walk of the development. Parking surveys were carried out on Tuesday 27th and Wednesday 28th June 2017 to determine the level of on-street car parking capacity within the local area. A consistent parking stress of 88% or 57 parked vehicles was observed on both nights, with 65 unrestricted parking spaces available and 13 spaces available on single yellow lines, and therefore shows this is operating with spare capacity.
226. All new residents will be permit free for a future CPZ, while 3 year car club membership for new residents is offered. Ilderton Road is currently uncontrolled however this is being reviewed and changes may be made related to the S278 works.

Cycle parking

227. The scheme proposes dedicated residential storage for 224 bicycles and 25 commercial spaces in line with London Plan and London Cycle Design Standards for both residential and commercial elements. To ensure delivery, a condition for detailed design is required. Residential and commercial cycle parking is accessed via the respective cores or direct from Ilderton Road.
228. The applicant has agreed to provide three years membership to all eligible residents to dockless cycle hire schemes which can be secured by the S106 legal agreement. A scheme of 'Brompton' lockers for 10% of residential units with at least 2 of which have EV charging is considered an acceptable alternative to the dockless cycle hire, and would be secure by Section 106 legal agreement. This would also provide access to cycling without needing to own a bicycle.

Construction management

229. In order to ensure that increases in traffic, noise and dust associated with the construction phase of the development are minimised, a construction management plan is requested by condition.

Impact on trees

230. Saved policy 3.13 of the Southwark Plan requires high quality and appropriately designed streetscape and landscape proposals.
231. Two new trees would be planted which represents a net gain in tree cover which is welcomed and supported. The existing pavement would be widened to accommodate further new tree planting which can be secured by a S.278 Highways agreement.

Planning obligations (S.106 undertaking or agreement)

232. 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.
233. The application would be supported by the following s106 obligations:

Planning Obligation	Mitigation	Applicant Position
Archaeology	£11,171	Agreed
Affordable housing monitoring	£6,095 (for 46 units)	Agreed
Carbon Offset – Green Fund	£244,543.75 (Consisting of £242,127 for residential and £2,416.75 for non-residential)	Agreed
Delivery and service bond	£13,300	Agreed
Public open space	£102,500	Agreed
Loss of employment space	£1848.09 for 202sqm for B1(c) land use	Agreed
Transport for London Buses	Amount to be agreed	To be agreed
Transport for London Legible signage	£6,000	Funded through CIL
Transport for London Healthy Streets	£130,000	Funded through CIL
Child play space shortfall	£45,904.00	Agreed
Admin fee	2%	Agreed
Total	£561,362	

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

- Affordable housing provisions
- Wheelchair housing provisions
- Appointment of workspace co-ordinator
- Affordable workspace – 10% of floorspace
- Terms for the affordable workspace – £12 per sq ft, over a 15 year period
- Retention of existing occupiers business plan
- Loss of employment floorspace
- Construction phase jobs
- Highway works – s278 for parking bays, highway works including disabled and loading bay provision and tree planting
- Dockless cycle hire for 3 years or Brompton lockers (10% of units)
- Car club membership for 3 years
- Parking permits exclusion zone for future occupants
- Connection to a future district heating system
- Disabled parking restrictions

235. In the event that an agreement has not been completed by 27 April 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 S106 legal agreement there is no mechanism in place to secure adequate provision of affordable housing and mitigation against the adverse impacts of the development through contributions and it would therefore be contrary to 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 Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015).

Mayoral and Southwark Community Infrastructure Levy (CIL)

236. 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.

237. In this instance an approximate Mayoral CIL payment of £638,976.17 and an approximate Southwark CIL payment of £2,776,663.85 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.

Sustainable development implications

238. Policy 5.2 of the London Plan requires major developments to provide an assessment of their energy demands and to demonstrate that they have taken steps to apply the

Mayor's energy hierarchy. Policies 5.5 and 5.6 require consideration of decentralised energy networks and policy 5.7 requires the use of on-site renewable technologies, where feasible. The residential aspect of the proposal would be expected to achieve zero carbon, and the commercial aspect a 35% reduction against part L of the Building Regulations (2013). An Energy statement and Sustainability Assessment based on the Mayor's hierarchy have been submitted.

Be lean (use less energy)

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

Be clean (supply energy efficiently)

240. A communal gas boiler would be provided to reduce the carbon dioxide savings further.
241. The building would be future-proofed for connection to a future district heating system which would be secured through the S106 agreement.

Be green (low or carbon zero energy)

242. A range of low or zero carbon technologies was considered and photo voltaic panels (PVs) were found to be most suitable for this scheme. The PVs proposed would reduce carbon emissions by 6%; this would not meet the 20% target for Strategic Policy 13 of the Core Strategy. It is noted that the development is constrained by its massing in what can be achieved. The roof area to overall floor area ration is very low as the buildings are narrow and tall. This significantly restricts the amount of PVs that can be installed on the roofs and reduces the overall carbon savings that can be achieved.
243. Overall, the 'be lean', 'be clean' and 'be green' measures would result in an overall reduction in carbon dioxide emissions when compared to a scheme compliant with the building regulations.
244. For the residential element, a 12% carbon reduction would be achieved falling short of the zero carbon requirements as set out in policy 5.2 of the London Plan, amounting to a 134.51 tonne shortfall.
245. For the commercial element, a 30.81% reduction in carbon emissions would be achieved, falling short of the 35% target against Part L of the Building Regulations (2013), amounting to a 1.12 tonne shortfall.
246. Recognising that both the residential and commercial aspects fall below the policy requirements in relation to carbon savings, a contribution towards the council's carbon offset fund would be required. Calculated on the basis of £1,800 per tonne, the residential component would generate a contribution of £212,127 and the commercial component a contribution of £2416.75 at £60 per tonne. The applicant has agreed to make the contribution of £244,543.75 to the carbon off set fund which would therefore make this aspect of the scheme fully policy compliant.

BREEAM

247. Strategic policy 13 of the Core Strategy requires the commercial units to achieve BREEAM 'excellent'. A BREEAM Pre-assessment report has been undertaken which demonstrates that a "Very Good" standard can be achieved. This does not meet the required "Excellent" standard that is required for the commercial element. A pre-fit condition for the commercial workspace to secure an 'Excellent' standard is therefore recommended. A proposed B1(c) fit out condition will assist this improvement.

Ecology

248. The applicant has submitted a Preliminary Ecological Appraisal and Building Inspection for Bats which has been reviewed by the council's Ecologist. The assessment indicates that there would be no adverse impact to bats. Green roof are proposed on which would provide some biodiversity and sustainability benefits and accordingly is welcomed, subject to condition. A condition is also proposed for the installation of 3 x nest boxes for house sparrows in the brick work on the East elevation of Core B and the South elevation of Core A. This requirement would also be secured by condition
249. The appraisal noted that Japanese Knotweed is present in two locations on the site. As such a control of invasive species condition is suggested for the removal or long-term management /eradication of the Japanese Knotweed, as the spread of which is prohibited under the Wildlife and Countryside Act 1981.

Other matters

Flood risk and water resources

250. 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 Environment Agency has reviewed the applicant's Flood Risk Assessment and considers it to be acceptable subject to the attachment of conditions being attached to any grant of planning permission.
251. The council's Flood Risk Management Team support the inclusion of green roofs and further storage to meet a site discharge rate of 5 l/s for 1 year and 100 year return period critical storms plus a climate change allowance of 40%. They have requested two conditions requiring a Flood Warning and Evacuation Plan and a Basement Impact Assessment is required:

Archaeology

252. The site is within the 'Bermondsey Lake' Archaeological Priority Zone (APZ) 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.
253. An archaeological desk-based assessment has been submitted with the application, which has been reviewed by the council's archaeologist. As the proposal includes a basement in its design, a series of archaeological conditions are recommended in relation to securing a programme of archaeological evaluation, mitigation and reporting.

Conclusion on planning issues

254. The proposed development would result in the delivery of substantial amount of B class floorspace, although the introduction of residential uses in to the SPIL would represent a departure from the adopted development plan. The draft New Southwark Plan and Old Kent Road Area Action Plan do, however, provide an indication of the direction of travel for planning policy in the area specifically involving the site to be released from its SPIL designation and the expectation of mixed use neighbourhoods and significant levels of new housing. The proposed development would increase the numbers of jobs on the site and deliver new housing, including a policy compliant level of affordable housing in terms of habitable rooms. Affordable workspace has been proposed and there are further benefits in terms of business retention which can be secured by the legal agreement. Recognising the changing character and uses carried out in the immediate area, it is not felt that any harm to existing businesses would arise by the introduction of housing. In light of this it is considered that the principle of the proposed development should be supported in this instance.
255. The proposal would deliver a good standard of accommodation and would address the majority of standards as set out in the residential design standards adopted by the council in relation to unit mix, unit size, dual aspect and wheelchair housing. The provision of affordable housing, measured at 36.4% of habitable rooms would be policy compliant and is a positive aspect of the proposals.
256. A detailed daylight and sunlight assessment has been undertaken in relation to all neighbouring residential properties in accordance with the BRE guidelines on daylight and sunlight. As the existing site massing is modest, there would be some noticeable proportional reductions to daylight and sunlight that as a consequence of the scheme optimising the full potential of the site. While reductions in amenity to many of the properties assessed fully comply with the default BRE criteria, there will be impacts to some properties. However, in each case these are considered to be limited and to not unacceptably harm the amenity of neighbouring residents and are therefore considered acceptable.
257. The scheme would have significant townscape benefits and improve outlook for neighbouring properties in terms of new public realm, natural surveillance and commercial activity.
258. The height and massing of the proposed buildings and podium would optimise the use of the site, respond successfully to the existing character and surrounding context, and the architectural language, inspired by nearby buildings and the design guidance in the draft Area Action Plan would result in an attractive building.
259. It is therefore recommended that planning permission be granted subject to conditions and the completion of a legal agreement under the terms as set out above, and referral to the Mayor of London and Secretary of State.

Community impact statement

260. Details of consultation undertaken by the applicant on the proposed development prior to submission of the planning application have been provided. Leaflets were sent to local businesses detailing the proposals with contact details and an offer to meet with

residents and businesses to discuss the scheme. Information was supplied as a result of two requests. The applicant also met with Network Rail to discuss the scheme and extent of land ownership.

261. 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.

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

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

264. 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

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

Consultation replies

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

Summary of consultation responses

267. Following neighbour consultation, ten objections have been received, the main points of which have been summarised and addressed below.

268. Objection: Keep as the commercial property and jobs will be lost.
Officer response: Employment floorspace will be reprovided on site with an increase in job creation.

269. Objection: No need for more housing as development has already been granted.
Officer response: There is still significant housing need within Southwark.
270. Objection: Concerns that the 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.
Officer response: This matter is thoroughly assessed within the body of this report.
271. Objection: Officers need to be confident that the development does not prejudicially inhibit other developments coming forward at a similar scale. TVIA and DAS insufficient in relation to cumulative impacts.
Officer response: Officers are confident that the development does not prejudicially inhibit other developments coming forward at a similar scale following the plan led approach set out in the draft Old Kent Road AAP. The submitted documents are considered appropriate.
272. Objection: This Application does not consider the impact on the ability of the adjacent site at 1 White Post to be brought forward for regeneration.
Officer response: This has been addressed above in relation to daylight and sunlight impacts in the body of this report.
273. Objection: Proposed building will block views for existing residents.
Officer response: The proposal will change the skyline within the area, however the proposal is considered acceptable in terms of impact on outlook and townscape and does not impact any protected views.
274. Objection: Existing properties will be overshadowed and overlooked by the proposed building
Officer response: The proposal will have some impact in terms of overshadowing to existing neighbours, however the level of overshadowing is considered not harmful to warrant refusal of the application. In terms of overlooking, the proposed scheme and properties are separated to an acceptable level commensurate to an urban context.
275. Objection: The proposal would restrict and block light to existing properties.
Officer response: The daylight and sunlight impacts have been assessed and are considered acceptable for this context.
276. Objection: The process of the development will cause a lot of disruption, noise, dust, fumes and smell.
Officer response: A construction management plan will be secured by condition to mitigate the impact of development.

Summary of responses from external and statutory consultees

GLA

277. 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.
278. The provision of residential units on this protected industrial site in the Old Kent

Road Opportunity Area is not currently supported, in line with London Plan Policies 2.17 and 4.4 and draft London Plan Policy E6. The balance of uses proposed does not accord with London Plan Policy 4.4 and Policy E7 of the draft London Plan; and should the site be considered suitable for mixed-use development the applicant must provide genuine industrial floorspace to address the requirements of draft London Plan Policy E7.

279. Officer Response: 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”. 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.
280. Following extensive revisions to the design of the proposal in light of site constraints that include the narrow shape of the site, it is considered that a B1 use class with a conditioned B1(c) fit out is the most appropriate use class that will deliver increased delivery of jobs within the area.
281. The proposed affordable housing offer at 35% by habitable room, does not meet the GLA’s 50% threshold for the Fast Track Route for applications on industrial land; therefore, a financial viability assessment must be provided. Early and late stage review mechanisms must be secured in accordance with Policy H6 of the draft London Plan and the Mayor’s SPG; and the affordability of the units must accord with the requirements of Policy H7 of the draft London Plan, the Mayor’s Affordable Housing and Viability SPG, and the London Plan Annual Monitoring Report.
282. Officer Response: The proposed offer of 36% affordable housing by habitable rooms is considered policy compliant in relation to the Affordable Housing SPD (2008 - Adopted and 2011 - Draft). London Borough of Southwark requires full viability assessment in line with its adopted Development Viability SPD (2016). This has been submitted and reviewed independently on behalf of the council by BPS. BPS have concluded that the scheme is providing the maximum level of affordable housing. GLA have also reviewed the viability report and reached the same conclusion.
283. The carbon emission figures (for the entire site) in tonnes per annum for each stage of the energy hierarchy for the domestic and non-domestic elements must be provided separately. Clarifications relating to the central plant room, site heat network, district heat network, photo voltaic roof layout, Air Source Heat Pump and TER/DER and BRUKL sheets are also requested.
284. Officer Response: The applicant is confirming the commercial carbon emission

figures.

285. The GLA requested a Servicing and Delivery Plan.

Officer Response: This would be secured by condition.

286. Concerns over the two loading bays and impact on the footway and residential entrances and provision of car parking in public realm

287. Officer Response: This scheme has been amended to improve bay locations and footway widths. The public realm has also been amended to move the proposed car parking.

288. In terms of residential quality, the footprint and orientation of the block creates good quality residential accommodation, with predominantly east/west aspects, efficient core to unit ratios and a reasonable proportion of dual aspect. The podium level shared amenity space between the two residential blocks is generous in proportions. Building heights supported.

289. Officer Response: The scheme has been further revised to improve residential quality including access to private and affordable units combined in Core A, an improved ratio of 1 and 2 bedroom flats with improved double aspect views and improved play space.

290. The development should be car free in line with the draft London Plan and emerging OKR AAP; therefore, the four car parking spaces proposed should be omitted. A total of four Blue Badge car parking spaces are proposed; this meets the initial provision required under draft London Plan Policy T6.1. However, further information must be provided indicating how this provision could be expanded to 10% as required by this policy. Funding for a controlled parking zone should be secured, and this development should be made "permit-free" except for Blue Badge holders. Active and passive electric vehicle charging points must also be secured.

291. Officer Response: Relevant conditions and S106 agreement proposed. It is not considered feasible to provide further parking on site in light of the requirement to reprovide commercial floorspace and the restricted shape of the site.

292. Cycle parking is below minimum standards and of poor quality and therefore must be improved. A contribution to the London Cycle Hire Scheme will also be required.

293. Officer Response: Cycle parking design will be secured by condition. Further amendments to the internal layout have been secured.

Metropolitan Police

294. Recommend a secured by design condition be attached to any grant of planning permission.

London Underground

295. No comment.

Thames Water

296. No objection, informative suggested.

Environment Agency

297. No objection subject to conditions.

Natural England

298. No comment.

Historic England

299. No comment.

Transport for London

300. Concerns raised regarding the pedestrian environment fronting Ilderton Road and the introduction of the bus layby.

301. Officer Response: The council agrees that the bus stops on Ilderton Road will need to be reviewed in light of the regeneration in the area. The relocation of the bus stop, if a change is required post review, will be agreed through the S278 and with TfL.

302. The proposed visitor cycle parking is situated in locations set back from the road and partially hidden (to the north by a car parking space, to the south by building columns). These should be relocated to make them more prominent and increase the level of natural surveillance, thereby reducing the risk of theft or tampering.

303. Officer Response: Detailed cycle parking and landscaping will be subject to condition

304. A financial contribution of £26,000 (£200 per unit) for cycle hire was requested.

305. Officer Response: Officers have worked with the developer on this and have recommended either Dockless cycle hire for 3 years or Brompton lockers (10% of units) to provide a convenient in house cycle hire facility with at least two lockers providing EV charging. This will allow residents and workers of the site to access convenient cycle hire using a quality model of bike that can be flexible in use.

306. The following financial contributions for highways infrastructure was requested:

- Healthy Streets = £130,000
- Legible London = £6,000

307. Officer response: Infrastructure requirements are covered under CIL. We are working with TfL on a surface transport delivery plan with estimates and priorities. Developers are also making contributions to public realm improvements and will be delivering improvements in the vicinity of the development within their S278 agreement.

308. Detailed Construction Traffic Management Plan (CTMP) and Delivery and Servicing Management Plans are required by condition

309. Officer response: Agreed.

310. Car-free development supported. Room for disabled parking expansion.
311. Officer response: Due to site constraints and other policy requirements this is not possible. However council will condition that the disabled bays will not be able to be reallocated to private households.
312. It would be appropriate for all accessible parking spaces to have an EVCP given the difficulty inherent in allocating spaces.
313. Officer response: Noted. A condition is proposed to secure this.
314. A financial contribution of £416,250 has been requested for improvements to bus services.
315. Officer response: Officers agree with TfL that an 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). 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 and coherent and can be seen by local people and developers alike to addressing concerns about bus capacity.

Network Rail

316. No objection subject to Network Rail construction requirements

Human rights implications

317. 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.
318. This application has the legitimate aim of providing a new building with employment and residential uses. 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/ 2327-349	Chief Executive's	Planning enquiries telephone:

Application file: 17/AP/4819 Southwark Local Development Framework and Development Plan Documents	Department 160 Tooley Street London SE1 2QH	020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 5513 Council website: www.southwark.gov.uk
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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	Tom Buttrick, Team Leader
Version	Final
Dated	14 November 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	16 November 2018	

APPENDIX 1**Consultation undertaken**

Site notice date: 29/01/2018

Press notice date: 01/02/2018

Case officer site visit date: n/a

Neighbour consultation letters sent: 30/01/2018

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
 Public Health Team
 Waste Management

Statutory and non-statutory organisations consulted:

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

Neighbour and local groups consulted:

66 Windermere Point Old Kent Road SE15 1DZ	Flat 29 Heversham House Tustin Estate SE15 1EL
67 Windermere Point Old Kent Road SE15 1DZ	Flat 23 Heversham House Tustin Estate SE15 1EL
64 Windermere Point Old Kent Road SE15 1DZ	Flat 6 Heversham House Tustin Estate SE15 1EJ
65 Windermere Point Old Kent Road SE15 1DZ	Flat 7 Heversham House Tustin Estate SE15 1EJ
70 Windermere Point Old Kent Road SE15 1DZ	Flat 4 Heversham House Tustin Estate SE15 1EJ
71 Windermere Point Old Kent Road SE15 1DZ	Flat 5 Heversham House Tustin Estate SE15 1EJ
68 Windermere Point Old Kent Road SE15 1DZ	Flat 21 Heversham House Tustin Estate SE15 1EL
69 Windermere Point Old Kent Road SE15 1DZ	Flat 22 Heversham House Tustin Estate SE15 1EL
63 Windermere Point Old Kent Road SE15 1DZ	Flat 8 Heversham House Tustin Estate SE15 1EJ
57 Windermere Point Old Kent Road SE15 1DZ	Flat 9 Heversham House Tustin Estate SE15 1EJ
58 Windermere Point Old Kent Road SE15 1DZ	Flat 32 Heversham House Tustin Estate SE15 1EL
55 Windermere Point Old Kent Road SE15 1DZ	Flat 44 Heversham House Tustin Estate SE15 1EL
56 Windermere Point Old Kent Road SE15 1DZ	Flat 45 Heversham House Tustin Estate SE15 1EL
61 Windermere Point Old Kent Road SE15 1DZ	Flat 42 Heversham House Tustin Estate SE15 1EL
62 Windermere Point Old Kent Road SE15 1DZ	Flat 43 Heversham House Tustin Estate SE15 1EL
59 Windermere Point Old Kent Road SE15 1DZ	Flat 48 Heversham House Tustin Estate SE15 1EN
60 Windermere Point Old Kent Road SE15 1DZ	Flat 49 Heversham House Tustin Estate SE15 1EN
72 Windermere Point Old Kent Road SE15 1DZ	Flat 46 Heversham House Tustin Estate SE15 1EL
Flat Above 885 Old Kent Road SE15 1NL	Flat 47 Heversham House Tustin Estate SE15 1EN
303 Ilderton Road London SE15 1NW	Flat 41 Heversham House Tustin Estate SE15 1EL
840 Old Kent Road London SE15 1NQ	Flat 35 Heversham House Tustin Estate SE15 1EL
1 Ambleside Point Tustin Estate Patterdale Road SE15 1EA	Flat 36 Heversham House Tustin Estate SE15 1EL
10 Ambleside Point Tustin Estate Patterdale Road SE15 1EA	Flat 33 Heversham House Tustin Estate SE15 1EL
Unit 13 Canterbury Industrial Park SE15 1NP	Flat 34 Heversham House Tustin Estate SE15 1EL
73 Windermere Point Old Kent Road SE15 1DZ	Flat 39 Heversham House Tustin Estate SE15 1EL
Canterbury Arms 871 Old Kent Road SE15 1NX	Flat 40 Heversham House Tustin Estate SE15 1EL
The Redeemed Christian Church Of God 30 Wagner Street SE15 1NN	Flat 37 Heversham House Tustin Estate SE15 1EL
885 Old Kent Road London SE15 1NL	Flat 38 Heversham House Tustin Estate SE15 1EL
887 Old Kent Road London SE15 1NL	Ground Floor Right 881-883 Old Kent Road SE15 1NL
4 Windermere Point Old Kent Road SE15 1DY	Arch 77 876 Old Kent Road SE15 1NQ
5 Windermere Point Old Kent Road SE15 1DY	Living Accommodation Canterbury Arms SE15 1NX
35 Windermere Point Old Kent Road SE15 1DY	Ground Floor Left 881-883 Old Kent Road SE15 1NL
36 Windermere Point Old Kent Road SE15 1DY	Arch 68 897a Old Kent Road SE15 1NL
8 Windermere Point Old Kent Road SE15 1DY	Arch 69 897a Old Kent Road SE15 1NL

25 Ambleside Point Tustin Estate Patterdale Road SE15 1EA	Flat 59 Heversham House Tustin Estate SE15 1EN
26 Ambleside Point Tustin Estate Patterdale Road SE15 1EA	Flat 53 Heversham House Tustin Estate SE15 1EN
20 Ambleside Point Tustin Estate Patterdale Road SE15 1EA	Flat 54 Heversham House Tustin Estate SE15 1EN
15 Ambleside Point Tustin Estate Patterdale Road SE15 1EA	Flat 51 Heversham House Tustin Estate SE15 1EN
16 Ambleside Point Tustin Estate Patterdale Road SE15 1EA	Flat 52 Heversham House Tustin Estate SE15 1EN
12 Ambleside Point Tustin Estate Patterdale Road SE15 1EA	Flat 57 Heversham House Tustin Estate SE15 1EN
14 Ambleside Point Tustin Estate Patterdale Road SE15 1EA	Flat 58 Heversham House Tustin Estate SE15 1EN
19 Ambleside Point Tustin Estate Patterdale Road SE15 1EA	Flat 55 Heversham House Tustin Estate SE15 1EN
2 Ambleside Point Tustin Estate Patterdale Road SE15 1EA	Flat 56 Heversham House Tustin Estate SE15 1EN
17 Ambleside Point Tustin Estate Patterdale Road SE15 1EA	Flat 68 Heversham House Tustin Estate SE15 1EN
18 Ambleside Point Tustin Estate Patterdale Road SE15 1EA	Flat 80 Heversham House Tustin Estate SE15 1ES
29 Ambleside Point Tustin Estate Patterdale Road SE15 1EA	Flat 81 Heversham House Tustin Estate SE15 1ES
7 Ambleside Point Tustin Estate Patterdale Road SE15 1EA	Flat 78 Heversham House Tustin Estate SE15 1ES
8 Ambleside Point Tustin Estate Patterdale Road SE15 1EA	Flat 79 Heversham House Tustin Estate SE15 1ES
5 Ambleside Point Tustin Estate Patterdale Road SE15 1EA	Flat 84 Heversham House Tustin Estate SE15 1ES
6 Ambleside Point Tustin Estate Patterdale Road SE15 1EA	Flat 85 Heversham House Tustin Estate SE15 1ES
38 Ambleside Point Tustin Estate Patterdale Road SE15 1EB	Flat 82 Heversham House Tustin Estate SE15 1ES
39 Ambleside Point Tustin Estate Patterdale Road SE15 1EB	Flat 83 Heversham House Tustin Estate SE15 1ES
9 Ambleside Point Tustin Estate Patterdale Road SE15 1EA	Flat 77 Heversham House Tustin Estate SE15 1ES
37 Ambleside Point Tustin Estate Patterdale Road SE15 1EB	Flat 71 Heversham House Tustin Estate SE15 1EN
4 Ambleside Point Tustin Estate Patterdale Road SE15 1EA	Flat 72 Heversham House Tustin Estate SE15 1EN
31 Ambleside Point Tustin Estate Patterdale Road SE15 1EA	Flat 69 Heversham House Tustin Estate SE15 1EN
32 Ambleside Point Tustin Estate Patterdale Road SE15 1EA	Flat 70 Heversham House Tustin Estate SE15 1EN
3 Ambleside Point Tustin Estate Patterdale Road SE15 1EA	Flat 75 Heversham House Tustin Estate SE15 1ES
30 Ambleside Point Tustin Estate Patterdale Road SE15 1EA	Flat 76 Heversham House Tustin Estate SE15 1ES
35 Ambleside Point Tustin Estate Patterdale Road SE15 1EA	Flat 73 Heversham House Tustin Estate SE15 1ES
36 Ambleside Point Tustin Estate Patterdale Road SE15 1EA	Flat 74 Heversham House Tustin Estate SE15 1ES
33 Ambleside Point Tustin Estate Patterdale Road SE15 1EA	45 Farrow Lane London SE14 5DB
34 Ambleside Point Tustin Estate Patterdale Road SE15 1EA	53 Farrow Lane SE14 5DB
Flat 26 Heversham House Tustin Estate SE15 1EL	49 Farrow Lane New Cross
Flat 27 Heversham House Tustin Estate SE15 1EL	47 Farrow Lane New Cross SE14 5DB
Flat 24 Heversham House Tustin Estate SE15 1EL	51 Farrow Lane New Cross SE14 5DB
Flat 25 Heversham House Tustin Estate SE15 1EL	27 Farrow Lane London SE14 5DB
Flat 30 Heversham House Tustin Estate SE15 1EL	Bptw Partnership 40 Norman Road SE10 9QX
Flat 31 Heversham House Tustin Estate SE15 1EL	14 Regent'S Wharf All Saints Street NI 9RL
Flat 28 Heversham House Tustin Estate SE15 1EL	Bptw Planning

Re-consultation: 14/05/2018

APPENDIX 2

Consultation responses received

Internal services

Economic Development Team

Statutory and non-statutory organisations

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

Neighbours and local groups

Bptw Partnership 40 Norman Road SE10 9QX
 Flat 25 Heversham House Tustin Estate SE15 1EL
 14 Regent'S Wharf All Saints Street NI 9RL
 22 Windermere Point Old Kent Road SE15 1DY

27 Farrow Lane London SE14 5DB
45 Farrow Lane London SE14 5DB
47 Farrow Lane New Cross SE14 5DB
49 Farrow Lane New Cross
53 Farrow Lane SE14 5DB

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	Mr Lawrence 313-349 Ilderton Road LLP	Reg. Number	17/AP/4819
Application Type	Full Planning Application	Case Number	TP/2327-349
Recommendation	Grant subject to Legal Agreement and GLA		

Draft of Decision Notice

Planning Permission was GRANTED for the following development:

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

(This application represents a departure from strategic policy 10 'Jobs and businesses' of the Core Strategy (2011) and saved policy 1.2 'strategic and local preferred industrial locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location).

Original description: Mixed use redevelopment comprising, demolition of existing buildings and construction of two buildings: one of part 11 and 13 storeys and one of part 13 and 15 storeys to provide 1,888sqm (GIA) of commercial floorspace (use class B1) at part basement, ground and first floors, 130 residential dwellings above (51 x 1 bed, 52 x 2 bed and 27 x 3 bed), with associated access and highway works, amenity areas, cycle, disabled and commercial car parking and refuse/recycling stores.

At: LAND AT 313-349 ILBERTON ROAD, LONDON SE15

In accordance with application received on 14/12/2017

and Applicant's Drawing Nos. Proposed Plans

2495_GA-SP-B01 P5
 2495_GA-SP-L00 P5
 2495_GA-SP-L01 P5
 2495_GA-SP-L02 P5
 2495_GA-SP-L03 P5
 2495_GA-SP-L04-L05 P2
 2495_GA-SP-L06 P2
 2495_GA-SP-L07-L08 P2
 2495_GA-SP-L09 P5
 2495_GA-SP-L10 P5
 2495_GA-SP-L11 P5
 2495_GA-SP-L12 P5
 2495_GA-SP-L13 P5
 2495_GA-SP-L14 P5
 2495_GA-SP-L15 P5
 2495_GA-P-A-B01 P5
 2495_GA-P-A-L00 P5
 2495_GA-P-A-L01 P5
 2495_GA-P-A-L02 P5
 2495_GA-P-A-L03 P5
 2495_GA-P-A-L04-L05 P2
 2495_GA-P-A-L06 P2
 2495_GA-P-A-L07-L08 P2
 2495_GA-P-A-L09 P5
 2495_GA-P-A-L10 P2
 2495_GA-P-A-L11 P5
 2495_GA-P-A-L12 P5
 2495_GA-P-A-L13 P5

2495_GA-P-A-L14 P5
 2495_GA-P-A-L15 P3
 2495_GA-P-B-B01 P5
 2495_GA-P-B-L00 P5
 2495_GA-P-B-L01 P5
 2495_GA-P-B-L02-08 P5
 2495_GA-P-A-L09 P5
 2495_GA-P-A-L10 P5
 2495_GA-P-A-L11 P5
 2495_GA-P-A-L12 P5
 2495_GA-P-A-L13 P5

Proposed elevations

2495_GA-E-AB-E P4
 2495_GA-E-AB-W P4
 2495_GA-E-A-E P4
 2495_GA-E-A-N P4
 2495_GA-E-A-NW P4
 2495_GA-E-A-S P4
 2495_GA-E-B-E P4
 2495_GA-E-B-NW P4
 2495_GA-E-B-S P4
 2495_GA-E-B-N P4

Proposed sections

2495_GA-S-AB-01 P3
 2495_GA-S-A-02 P3
 2495_GA-S-B-03 P3

Proposed flat layouts

2495_FT-A-1B2P-01 P4
 2495_FT-A-1B2P-02 P4
 2495_FT-A-1B2P-03 P4
 2495_FT-A-2B3P-01 P4
 2495_FT-A-2B3P-01 P1
 2495_FT-A-2B3PWCH-01 P4
 2495_FT-A-2B4P-01 P4
 2495_FT-A-2B4P-02 P4
 2495_FT-A-2B4P-03 P4
 2495_FT-A-3B4P-01 P4
 2495_FT-A-3B5P-01 P4
 2495_FT-B-1B2P-01 P4
 2495_FT-B-1B2P-02 P4
 2495_FT-B-2B3P-01 P4
 2495_FT-B-2B3P-02 P4
 2495_FT-B-2B3P-03 P1
 2495_FT-B-2B3P-04 P1
 2495_FT-B-2B3P-WCH-04 P1
 2495_FT-B-3B4P-01 P4
 2495_FT-B-3B5P-01 P3

Landscaping Masterplans

17.374-P-201G
 17.374-P-200F

Existing Plans

2495_EX-SP P1 - Site Plan
 2495_EX-P-L00-sheet 1 P1
 2495_EX-P-L00-sheet 2 P1
 2495_EX-P-L01 P1

Existing Elevations/Sections

2495_EX-E-sheet 1
 2495_EX-E-sheet 2 2495_DAS Design and Access Statement
 2495_DAS_ADDENDUM DAS Addendum
 2495_SC-AS Schedule of Accommodation -Summary P1
 2495_SC-TENURE Schedule of Tenure split P1

2495_SC-NIA Detailed Flat Schedule
 2495_SC-PA Private Amenity Schedule P1
 2495_SC-CPA-A Child Play Space Schedule (Core A) P1
 2495_SC-CPA-B Child Play Space Schedule (Core B) P1
 2495_SC-RR Refuse, Recycling Report P3
 2495_SC-CL Cycle Provision Schedule P1
 2495_SC-SBD Secure by Design Meeting Notes

Air Quality Assessment, Arborcultural Impact Assessment, Archaeological Assessment, Breeam 2014 Pre-Assessment Report, CIL form (Updated), Construction Traffic Management Plan, Daylight and Sunlight Assessment and Addendum, Delivery and Servicing Management Plan, Design and Access Statement and Addendum, Employment Strategy, Employment Assessment, Energy Statement, Flood Risk Assessment and Amendment, Ground Investigation Report, Noise Impact Assessment, Planning Statement (amended), Photographs and photomontages, Preliminary Ecology Assessment, Refuse and Recycling Review, SBD Meeting notes, Statement of Community Involvement, Structural Engineers Stage 2 Report, Transport Statement, Travel Plan, Townscape and Visual Impact Assessment, Utilities and Servicing Statement, Viability Report and Addendum, Viability Report Executive Summary, Wind and Microclimate Analysis

Subject to the following thirty-seven 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:

Proposed Plans

2495_GA-SP-B01 P5
 2495_GA-SP-L00 P5
 2495_GA-SP-L01 P5
 2495_GA-SP-L02 P5
 2495_GA-SP-L03 P5
 2495_GA-SP-L04-L05 P2
 2495_GA-SP-L06 P2
 2495_GA-SP-L07-L08 P2
 2495_GA-SP-L09 P5
 2495_GA-SP-L10 P5
 2495_GA-SP-L11 P5
 2495_GA-SP-L12 P5
 2495_GA-SP-L13 P5
 2495_GA-SP-L14 P5
 2495_GA-SP-L15 P5
 2495_GA-P-A-B01 P5
 2495_GA-P-A-L00 P5
 2495_GA-P-A-L01 P5
 2495_GA-P-A-L02 P5
 2495_GA-P-A-L03 P5
 2495_GA-P-A-L04-L05 P2
 2495_GA-P-A-L06 P2
 2495_GA-P-A-L07-L08 P2
 2495_GA-P-A-L09 P5
 2495_GA-P-A-L10 P2
 2495_GA-P-A-L11 P5
 2495_GA-P-A-L12 P5
 2495_GA-P-A-L13 P5
 2495_GA-P-A-L14 P5
 2495_GA-P-A-L15 P3
 2495_GA-P-B-B01 P5
 2495_GA-P-B-L00 P5
 2495_GA-P-B-L01 P5
 2495_GA-P-B-L02-08 P5
 2495_GA-P-A-L09 P5
 2495_GA-P-A-L10 P5
 2495_GA-P-A-L11 P5
 2495_GA-P-A-L12 P5
 2495_GA-P-A-L13 P5

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 2495_GA-E-AB-W P4
 2495_GA-E-A-E P4
 2495_GA-E-A-N P4
 2495_GA-E-A-NW P4
 2495_GA-E-A-S P4
 2495_GA-E-B-E P4
 2495_GA-E-B-NW P4
 2495_GA-E-B-S P4
 2495_GA-E-B-N P4

Proposed sections

2495_GA-S-AB-01 P3
 2495_GA-S-A-02 P3
 2495_GA-S-B-03 P3

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 2495_FT-A-1B2P-02 P4
 2495_FT-A-1B2P-03 P4
 2495_FT-A-2B3P-01 P4
 2495_FT-A-2B3P-01 P1
 2495_FT-A-2B3PWCH-01 P4
 2495_FT-A-2B4P-01 P4
 2495_FT-A-2B4P-02 P4
 2495_FT-A-2B4P-03 P4
 2495_FT-A-3B4P-01 P4
 2495_FT-A-3B5P-01 P4
 2495_FT-B-1B2P-01 P4
 2495_FT-B-1B2P-02 P4
 2495_FT-B-2B3P-01 P4
 2495_FT-B-2B3P-02 P4
 2495_FT-B-2B3P-03 P1
 2495_FT-B-2B3P-04 P1
 2495_FT-B-2B3P-WCH-04 P1
 2495_FT-B-3B4P-01 P4
 2495_FT-B-3B5P-01 P3

Landscaping Masterplans

17.374-P-201G
 17.374-P-200F

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 No works excluding demolition shall commence until details of a detailed water drainage strategy for the site, based on the principles set out in the approved Flood Risk Assessment prepared by Ardent Consulting Engineers (dated December 2017) has been submitted to and approved in writing by the Local Planning Authority in consultation with the LLFA.

The detailed drainage strategy will incorporate methods that will attenuate flows to the sewer network for the 100 year critical duration storm with a 40% allocation for climate change. In addition to this it has also been agreed that SuDS in line with SuDS principals, will be added into the design to provide a further improvement on attenuation of surface water flows. The scheme shall subsequently be implemented in accordance with the approved details.

Reason: To minimise the potential for the site to contribute to surface water flooding in accordance with saved

policy 3.9 Water of the Swithark Plan, Strategic policy 13 of the Core Strategy (2011) and guidance in the Sustainable Design and Construction SPD (2009).

- 4 No development shall take place, including any works of demolition, until a written Construction Environmental Management Plan (CEMP) for the site has been devised based on the principles set out in the CONSTRUCTION TRAFFIC MANAGEMENT PLAN prepared by Ardent Consultant Engineers (dated November 2017) and submitted with the application. The CEMP shall oblige the applicant, developer and contractors to commit to current best practice with regard to site management and to use all best endeavours to minimise off site impacts. A copy of the CEMP shall be available on site at all times and shall include the following information:

- " A detailed specification of demolition and construction works at each phase of development including consideration of all environmental impacts and the identified remedial measures;
- " Compliance with the GLA guidance on Non-Road Mobile Machinery;
- " Engineering measures to eliminate or mitigate identified environmental impacts e.g. acoustic screening, sound insulation, dust control, emission reduction, location of specific activities on site, etc., together with air and noise monitoring to demonstrate that potential impacts are being successfully controlled;
- " Arrangements for direct responsive contact for nearby occupiers with the site management during demolition and/or construction (signage on hoardings, newsletters, resident's liaison meetings);
- " A commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme;
- " Details of the routing of in-bound and outbound site traffic, one way site traffic, lay off areas, etc; and
- " Details of accurate waste identification, separation, storage, registered waste carriers for transportation and disposal to appropriate destinations.

All demolition and construction work shall then be undertaken in strict accordance with the CEMP and relevant codes of practice, unless otherwise agreed in writing by the Local Planning Authority.

Reason:

To ensure that occupiers of neighbouring premises and the wider environment do not suffer a loss of amenity by reason of unnecessary pollution or nuisance, in accordance with strategic policy 13 'High environmental standards' of the Core Strategy (2011) saved policy 3.2 'Protection of amenity' of the Swithark Plan (2007) and the National Planning Policy Framework 2012

- 5 Before demolition to ground level slab, 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 Swithark Plan 2007 and the National Planning Policy Framework 2012.

- 6 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 and shall not be carried out other than in accordance with any such approval given.

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 Swithark Plan 2007 and the National Planning Policy Framework 2012.

- 7 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 Chapter 12, paragraph 141 of the National Planning Policy Framework, policy 12 of the Core Strategy 2011 and saved policy 3.19 of the Swithark Plan 2007

- 8 Before demolition to ground level slab, 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 2012.

- 9 Prior to works commencing, full details of all proposed tree planting together with additional trees on Ilderton Road 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.

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 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.

- 10 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.

- 11 Once ground water levels are identified by on site ground investigation and prior to the beginning of works, the applicant shall submit an update to the Basement Impact Assessment to and be approved in writing by the Local Planning Authority. The update should include an assessment of the continuation and fluctuations of groundwater flows, and whether the lowest point of the basement is above, or below the recorded groundwater levels recorded from the ground investigations, and any mitigation measures required. The development and mitigation measures shall be carried out in accordance with the approved details. Further details on preparation of BIA's for flood risk can be found in appendix to Southwark's 2016 SFRA: <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 (2017); And to minimise the potential for the site to contribute to surface water flooding in accordance with saved policy 3.9 Water of the

Southwark Plan, Strategic policy 13 of the Core Strategy (2011) and guidance in the Sustainable Design and Construction SPD (2009).

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.

- 12 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 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.

- 13 i) Before any above grade work hereby authorised begins within the public realm (excluding demolition), the applicant shall submit details of all the play spaces proposed, 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 (excluding demolition) hereby authorised begins on any of phase of development (excluding public realm, as detailed in part i), the applicant shall submit details of all the play spaces proposed within that phase, 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 of each phase of development hereby approved, 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

- 14 Before any work above grade hereby approved begins on any phase of development, full particulars and details of a scheme for the fit out of the premises to an appropriate level for B1 (c) use 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. This should include details of the mechanical and electrical fit out of the units, showing heating and cooling provision, and the provision of kitchen and toilet facilities. The development shall not be carried out otherwise than in accordance with any approval given, and practical completion of the B1 (c) fit out for each phase shall be at the same time, or before the practical completion of the residential component of the same phase.

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.

- 15 Before any above grade work hereby authorised begins (excluding demolition) details of the green/brown roof shall be submitted to and approved in writing by the Local Planning Authority. The green/brown roof shall be: biodiversity based with extensive substrate base (depth 80-150mm); laid out in accordance with the 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 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 green/brown shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.

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.

- 16 Samples of all external facing materials to be used in the carrying out of this permission shall be presented to the Local Planning Authority and approved in writing before any above grade works, in connection with this permission is commenced. 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 Policies: 3.11 Efficient use of land; 3.12 Quality in Design; 3.13 Urban Design; of The Southwark Plan (UDP) July 2007.

- 17 Bay studies at a scale of 1:20 of facades from parapet to ground, including window design, to be used in the carrying out of this permission shall be submitted to and approved by the Local Planning Authority before any above grade work (excluding demolition) in connection with this permission is commenced. 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 Policies: 3.12 Quality in Design; 3.13 Urban Design; of The Southwark Plan (UDP) July 2007.

- 18 Before any above grade work hereby authorised begins (excluding demolition) (1:50 scale drawings) of all 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.

- 19 Section detail-drawings at a scale of 1:5 through:
the facades and balconies;
parapets and roof edges; and
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 before any work in connection with this permission is commenced (excluding demolition); 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.

- 20 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.

- 21 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.

- 22 Before any above grade work hereby authorised begins, a detailed method statement for the removal or long-term management /eradication of Japanese Knotweed on the site shall be submitted to and approved in writing by the local planning authority. The method statement shall include proposed measures to prevent the spread of Japanese Knotweed during any operations such as mowing, strimming or soil movement. It shall also contain measures to ensure that any soils brought to the site are free of the seeds / root / stem of any invasive plant covered under the Wildlife and Countryside Act 1981. Development shall proceed in accordance with the approved method statement.

Reasons: Japanese Knotweed is an invasive plant, the spread of which is prohibited under the Wildlife and Countryside Act 1981. Without measures to prevent its spread as a result of the development there would be the risk of an offence being committed and avoidable harm to the environment occurring.

- 23 Details of house sparrow nesting boxes / bricks shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the use hereby granted permission.

No less than three nesting boxes / bricks shall be provided and the details shall include the exact location, specification and design of the habitats. The boxes / bricks 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 house sparrow nesting boxes / bricks 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 2011, 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.

- 24 Before the first occupation of the building hereby permitted, a detailed Delivery and Servicing Management Plan (DSMP) detailing how all elements of the site are to be serviced has been submitted to and approved in writing by the Local Planning Authority. The detailed DSMP shall be based on the principles set out in the DELIVERY & SERVICING MANAGEMENT PLAN prepared by Ardent Consulting Engineers (dated November 2017) and submitted with the application. The development shall be carried out in accordance with the approval given and shall remain for as long as the development is occupied.

Reason

To ensure compliance with The National Planning Policy Framework 2012, Strategic Policy 2 Sustainable Transport of The Core Strategy 2011 and Saved Policy 5.2 Transport Impacts of the Southwark Plan 2007.

- 25 The residential accommodation hereby approved shall not be occupied until the ground and first floor commercial units have been fitted out in accordance with the approved B1(c) fit out details, unless otherwise agreed in writing by the Local Planning Authority.

Reason:

To ensure that occupiers of neighbouring residential properties do not suffer a loss of amenity by reason of noise nuisance from fit out works after residential accommodation has been occupied, 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).

- 26 As the site is at residual risk from the River Thames, a stand alone Flood Warning and Emergency Evacuation Plan should be submitted to Southwark's Emergency Planning department for their approval prior 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 itself. It should also provide details of how residents should respond in the event that they receive a flood warning, or become aware of a flood.

Reason: To minimise the risk of flooding in accordance with the Southwark Strategic Flood Risk Assessment (2017)

- 27 Before the first occupation of the building hereby approved, details of the installation (including location and type) of electric vehicle charger points for each parking space within the disabled 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 2012, 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.

- 28 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.

- 29 The development hereby permitted shall be constructed to include the energy efficiency measures, photovoltaic panels and CHP plant as stated in the Energy Statement by JAW Sustainability dated 6 December 2017 and submitted with 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 2012, Strategic Policy 13 High Environmental Standards of the Core Strategy and Policy 5.7 Renewable Energy of the London Plan 2015.

- 30 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_δ, 30 dB LAeq T*, typical noise levels of 45dB LAFmax T *

Living rooms- 35dB LAeq T_δ

Dining room - 40 dB LAeq T_δ

* - Night-time 8 hours between 23:00-07:00

δ - Daytime 16 hours between 07:00-23:00.

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 2012.

- 31 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 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.

- 32 The rating 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 at 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. This shall apply to future uses made of the developed site as well as plant used in connection with the residential use.

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).

- 33 The habitable rooms within the development sharing a party ceiling/floor element with commercial premises shall be designed and constructed to provide reasonable resistance to the transmission of sound sufficient to ensure that noise due to the commercial premises does not exceed NR20 as a predicted LAeq noise level. A written report including noise level predictions shall be submitted to and approved by the LPA prior any above grade works taking place. Prior to occupation of any homes or commencement of the commercial use, details of the proposed ceiling/floor construction, including likely sound insulation performance shall be submitted to the LPA for approval in writing. The development shall be carried out in accordance with the approval given and shall be permanently maintained thereafter.

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 premises 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 2012.

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).

- 34 If, during development (excluding demolition), 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 for, 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 (the site is located above a Secondary Aquifer).

- 35 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.

- 36 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.

- 37 Details of any external lighting [including design, power and position of luminaries] and security surveillance equipment of 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.

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 2012, 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.

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.

Informatives

- 1 Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. 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.
- 2 The proposed development is located close to Thames Waters 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/Developing-a-large-site/Planning-your-development/Workingnear-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading,

Berkshire RG1 8DB

3 On the basis of information provided, Thames Water would advise that with regard to water network infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

4 Network Rail Informative

The developer must ensure that their proposal, both during construction and after completion of works on site, does not:

- encroach onto Network Rail land
- affect the safety, operation or integrity of the company's railway and its infrastructure
- undermine its support zone
- damage the company's infrastructure
- place additional load on cuttings
- adversely affect any railway land or structure
- over-sail or encroach upon the air-space of any Network Rail land
- cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future

The developer should comply with the following comments and requirements for the safe operation of the railway and the protection of Network Rail's adjoining land.

Future maintenance

The development must ensure any future maintenance can be conducted solely on the applicant's land. The applicant must ensure that any construction and any subsequent maintenance can be carried out to any proposed buildings or structures without adversely affecting the safety of, or encroaching upon Network Rail's adjacent land and air-space, and therefore all/any building should be situated at least **2 metres (3m for overhead lines and third rail)** from Network Rail's boundary. The reason for the **2m (3m for overhead lines and third rail)** stand off requirement is to allow for construction and future maintenance of a building and without requirement for access to the operational railway environment which may not necessarily be granted or if granted subject to railway site safety requirements and special provisions with all associated railway costs charged to the applicant. Any less than **2m (3m for overhead lines and third rail)** and there is a strong possibility that the applicant (and any future resident) will need to utilise Network Rail land and air-space to facilitate works. The applicant / resident would need to receive approval for such works from the Network Rail Asset Protection Engineer, the applicant / resident would need to submit the request at least 20 weeks before any works were due to commence on site and they would be liable for all costs (e.g. all possession costs, all site safety costs, all asset protection presence costs). However, Network Rail is not required to grant permission for any third party access to its land. No structure/building should be built hard-against Network Rail's boundary as in this case there is an even higher probability of access to Network Rail land being

required to undertake any construction / maintenance works. Equally any structure/building erected hard against the boundary with Network Rail will impact adversely upon our maintenance teams' ability to maintain our boundary fencing and boundary treatments.

Drainage

Storm/surface water must not be discharged onto Network Rail's property or into Network Rail's culverts or drains except by agreement with Network Rail. Suitable drainage or other works must be provided and maintained by the Developer to prevent surface water flows or run-off onto Network Rail's property. Proper provision must be made to accept and continue drainage discharging from Network Rail's property; full details to be submitted for approval to the Network Rail Asset Protection Engineer. Suitable foul drainage must be provided separate from Network Rail's existing drainage. Soakaways, as a means of storm/surface water disposal must not be constructed near/within 10 – 20 metres of Network Rail's boundary or at any point which could adversely affect the stability of Network Rail's property. After the completion and occupation of the development, any new or exacerbated problems attributable to the new development shall be investigated and remedied at the applicants' expense.

Plant & Materials

All operations, including the use of cranes or other mechanical plant working adjacent to Network Rail's property, must at all times be carried out in a "fail safe" manner such that in the event of mishandling, collapse or failure, no plant or materials are capable of falling within 3.0m of the boundary with Network Rail.

Scaffolding

Any scaffold which is to be constructed within 10 metres of the railway boundary fence must be erected in such a manner that at no time will any poles over-sail the railway and protective netting around such scaffold must be installed. The applicant/applicant's contractor must consider if they can undertake the works and associated scaffold/access for working at height within the footprint of their property boundary.

Piling

Where vibro-compaction/displacement piling plant is to be used in development, details of the use of such machinery and a method statement should be submitted for the approval of the Network Rail's Asset Protection Engineer prior to the commencement of works and the works shall only be carried out in accordance with the approved method statement.

Fencing

In view of the nature of the development, it is essential that the developer provide (at their own expense) and thereafter maintain a substantial, trespass proof fence along the development side of the existing boundary fence, to a minimum height of 1.8 metres. The 1.8m fencing should be adjacent to the railway boundary and the developer/applicant should make provision for its future maintenance and renewal without encroachment upon Network Rail land. Network Rail's existing fencing / wall must not be removed or damaged and at no point either during construction or after works are completed on site should the foundations of

the fencing or wall or any embankment therein, be damaged, undermined or compromised in any way. Any vegetation on Network Rail land and within Network Rail's boundary must also not be disturbed. Any fencing installed by the applicant must not prevent Network Rail from maintaining its own fencing/boundary treatment.

Lighting

Any lighting associated with the development (including vehicle lights) must not interfere with the sighting of signalling apparatus and/or train drivers vision on approaching trains. The location and colour of lights must not give rise to the potential for confusion with the signalling arrangements on the railway. The developers should obtain Network Rail's Asset Protection Engineer's approval of their detailed proposals regarding lighting.

Noise and Vibration

The potential for any noise/ vibration impacts caused by the proximity between the proposed development and any existing railway must be assessed in the context of the National Planning Policy Framework which hold relevant national guidance information. The current level of usage may be subject to change at any time without notification including increased frequency of trains, night time train running and heavy freight trains.

Vehicle Incursion

Where a proposal calls for hard standing area / parking of vehicles area near the boundary with the operational railway, Network Rail would recommend the installation of a highways approved vehicle incursion barrier or high kerbs to prevent vehicles accidentally driving or rolling onto the railway or damaging lineside fencing.

Network Rail strongly recommends the developer contacts [AssetProtection@sussex@networkrail.co.uk](mailto:AssetProtection@sussex.networkrail.co.uk) prior to any works commencing on site, and also to agree an Asset Protection Agreement with us to enable approval of detailed works. More information can also be obtained from our website at www.networkrail.co.uk/asp/1538.aspx.

More information can also be obtained from our website at <https://www.networkrail.co.uk/communities/lineside-neighbours/working-by-the-railway/>

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