

## Planning Committee

Tuesday 8 September 2020  
6.30 pm

Online/Virtual: Members of the public are welcome to attend the meeting.  
Please contact [Constitutional.Team@southwark.gov.uk](mailto:Constitutional.Team@southwark.gov.uk) for a link or telephone dial-in instructions to join the online meeting

### Membership

Councillor Martin Seaton (Chair)  
Councillor Kath Whittam (Vice-Chair)  
Councillor Barrie Hargrove  
Councillor Adele Morris  
Councillor Margy Newens  
Councillor Damian O'Brien  
Councillor Catherine Rose  
Councillor Cleo Soanes

### Reserves

Councillor Eleanor Kerlake  
Councillor Sarah King  
Councillor Richard Livingstone  
Councillor James McAsh  
Councillor Hamish McCallum  
Councillor Darren Merrill  
Councillor Jason Ochere  
Councillor Jane Salmon

---

## INFORMATION FOR MEMBERS OF THE PUBLIC

---

### Access to information

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

### Babysitting/Carers allowances

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

### Access

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

**Contact:** Gerald Gohler 020 7525 7420 or email: [gerald.gohler@southwark.gov.uk](mailto:gerald.gohler@southwark.gov.uk)

**Queries on reports:** For enquiries about the contents of the reports, please contact the report author whose details are in the audit trail section at the end of each report.

---

Members of the committee are summoned to attend this meeting

**Eleanor Kelly**

Chief Executive

Date: 21 August 2020



# Planning Committee

Tuesday 8 September 2020  
6.30 pm

Online/Virtual: Members of the public are welcome to attend the meeting. Please contact [Constitutional.Team@southwark.gov.uk](mailto:Constitutional.Team@southwark.gov.uk) for a link or telephone dial-in instructions to join the online meeting

## Order of Business

Item No.	Title	Page No.
1.	<b>APOLOGIES</b>	
	To receive any apologies for absence.	
2.	<b>CONFIRMATION OF VOTING MEMBERS</b>	
	A representative of each political group will confirm the voting members of the committee.	
3.	<b>NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT</b>	
	In special circumstances, an item of business may be added to an agenda within five clear days of the meeting.	
4.	<b>DISCLOSURE OF INTERESTS AND DISPENSATIONS</b>	
	Members to declare any personal interests and dispensation in respect of any item of business to be considered at this meeting.	
5.	<b>MINUTES</b>	1 - 4
	To approve as a correct record the minutes of the meeting held on 29 June 2020.	
6.	<b>DEVELOPMENT MANAGEMENT</b>	5 - 8
	<b>6.1. VALMAR TRADING ESTATE, VALMAR ROAD, LONDON SE5 9NW</b>	9 - 116

<b>Item No.</b>	<b>Title</b>	<b>Page No.</b>
<b>6.2.</b>	<b>DAISY BUSINESS PARK, 19-35 SYLVAN GROVE, LONDON SE15 1PD</b>	117 - 249

### **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.”

Date: 21 August 2020

## Planning Committee

### Guidance on conduct of business for planning applications, enforcement cases and other planning proposals (virtual meetings)

**Please note:**

The council has made the following adaptations to the committee process to accommodate virtual meetings:

- The agenda will be published earlier than the statutory minimum of five working days before the meeting. We will aim to publish the agenda ten clear working days before the meeting.
- This will allow those wishing to present information at the committee to make further written submissions in advance of the meeting in order to:
  - Correct any factual information in the report
  - Confirm whether their views have been accurately reflected in the report
  - Re-emphasise the main points of their comments
  - Suggest conditions to be attached to any planning permission if granted.
- **Those wishing to speak at the meeting should notify the constitutional team at [Constitutional.Team@southwark.gov.uk](mailto:Constitutional.Team@southwark.gov.uk) in advance of the meeting by 5pm on the working day preceding the meeting.**

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 in the virtual meeting and wish to speak) for **not more than three minutes each**. **Speakers must notify the constitutional team at [Constitutional.Team@southwark.gov.uk](mailto:Constitutional.Team@southwark.gov.uk) in advance of the meeting by 5pm on the working day preceding the meeting.**

- (a) One representative (spokesperson) for any objectors. If there is more than one objector wishing to speak, the time is then divided within the three-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). If there is more than one supporter (who lives within 100 metres of the development site) wishing to speak, the time is divided within the 3-minute time slot.
- (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 three-minute time allowance must be divided amongst those wishing to speak. Where you are unable to decide who is to speak in advance of the meeting, the chair will ask which objector(s)/supporter(s) would like to speak at the point the actual item is being considered. The clerk will put all objectors who agree to this in touch with each other, so that they can arrange a representative to speak on their behalf at the meeting. The clerk will put all supporters who agree to this in touch with each other, so that they can arrange a representative to speak on their behalf at the meeting.
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, will be speaking in their designated time-slots only, apart from answering brief questions for clarification; this 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 to which is open to the public and there should be no interruptions from members of the public.
10. Members of the public are welcome to record, screenshot, or tweet the public proceedings of the meeting.
11. Please be considerate towards other people and take care not to disturb the proceedings.
12. This meeting will be recorded by the council and uploaded to the Southwark Council YouTube channel the day after the meeting.

**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

**FOR ACCESS TO THE VIRTUAL MEETING (ONLINE/BY TELEPHONE)**

**PLEASE CONTACT:**

Planning Committee Clerk, Constitutional Team  
Finance and Governance

Tel: 020 7525 7420 or email: [gerald.gohler@southwark.gov.uk](mailto:gerald.gohler@southwark.gov.uk)

## **REMOTE MEETING ETIQUETTE FOR PARTICIPANTS**

Members of the committee, other councillors who seek to address the committee, officers advising the committee or presenting reports, any external partners / third-parties invited to address or advise the committee, co-optees and any members of the public who have registered to speak at the meeting are asked to adhere to the following guidelines:

### **Preparing for the meeting**

1. If you are planning to attend, please make sure you have informed the constitutional/scrutiny officer named on the agenda front sheet, so that a full list of those expected at the meeting can be prepared and you are sent the joining instructions.
2. Ensure that you are located in an area where you are unlikely to be disturbed.
3. Ensure that your broadband connection is sufficiently stable to join the meeting. If your connection has low bandwidth, you might need to ask others using your broadband connection to disconnect their devices from the broadband for the duration of the meeting. If this does not help, you may wish to try connecting your device to your router using an Ethernet cable.
4. When accessing the meeting using a private laptop or desktop computer, you will need to use the link you have been provided with outside of the Soutwark CITRIX environment.
5. Ensure that your background is neutral (a blank wall is best) and that you are dressed as though you attend a meeting that is open to the public in real life.
6. If you decide to switch on your camera, please ensure that the camera on the device that you are using is positioned to provide a clear view of your face. This may involve thinking about the lighting in the room you are in (for example, sitting in front of a window may plunge your face into shadow) or putting your webcam, laptop or tablet on top of a stack of books so that you can look straight into the camera.
7. Ensure that you are familiar with the functions of the software you are using. The constitutional/scrutiny officer will be online 10 minutes before the scheduled start of the meeting to give everyone time to join and deal with any technical challenges. Please try to join the meeting at least 5 minutes before the meeting start time to make sure that everything is working. Ideally, you should use earphones or a headset to participate in meetings as it reduces the risk of feedback from using your device's external speaker and reduces background noise from your surroundings. Please do not access the meeting with two devices simultaneously, or if this is unavoidable, please ensure you mute the microphones when not speaking, and turn down the speakers when you are speaking. This will avoid feedback.
8. Meeting participants that choose to join the meeting using the conference call facility will not be able to use video, view other participant's video, or see any documents that are shared using the screen sharing function. [Planning meeting only: The chair has ruled that the meeting will not accept members of the committee participating using a telephone connection alone.]

### **At the meeting**

9. Join the meeting promptly to avoid unnecessary interruptions.
10. When joining the virtual meeting, please mute your microphone and switch off your camera until the chair opens the meeting formally.

11. Mute your microphone when you are not speaking. You may also want to turn off your video when not speaking in order to reduce the bandwidth needed. Participants joining the meeting from a mobile phone can unmute themselves by pressing \*6 on their device.
12. The regulations state that for members to be considered to be in attendance at a virtual meeting, they have to be able to hear the proceedings, and the meeting has to be able to hear them. You can therefore choose to switch off your camera even when speaking, for privacy reasons, if you prefer.
13. Only speak when invited to do so by the Chair.
14. When speaking for the first time, please state your name.
15. Keep comments, questions and other contributions brief and to the point.
16. If referring to a specific page on the agenda, mention the page number or paragraph number.
17. The 'chat' function must only be used by committee members to indicate a wish to speak. It is not to be used for conversations and should be used in an appropriate and professional manner at all times.
18. Once the Chair closes the meeting, all remaining participants should leave the meeting promptly.
- 19.

#### **Exempt or confidential items / closed session**

Occasionally, committees may need to go into closed session to consider information that is confidential or exempt from publication. If this happens, the committee will pass a resolution to that effect, and for those meetings that are being livestreamed, the livestream will be cut.

20. If you are asked to leave the meeting, please end your connection promptly. Any connections that are not ended promptly will be terminated by the constitutional/scrutiny officer.
21. Members of the committee should ensure that, if the meeting goes into closed session, they are on their own and cannot be overheard in the place they are accessing the closed session from.
22. After the motion to go into closed session has been passed, members should exit the main meeting and re-join the "Briefing/Closed session" Teams meeting. Once the closed session has ended, members should re-join the main meeting by clicking on the link to the main meeting they initially used.

## **LIVESTREAMING / RECORDING NOTICE**

This meeting will be livestreamed, and recorded for future viewing, on the council's YouTube channel (except where there are confidential or exempt items being discussed in closed session):

[https://www.youtube.com/channel/UCqgAueevJzRUGB\\_eAZia0xw](https://www.youtube.com/channel/UCqgAueevJzRUGB_eAZia0xw)

The livestream/recording will also be paused when the meeting adjourns.

If you make a representation to the meeting and you do not switch off your camera, you will be deemed by the council to have consented to being filmed and to the possible use of those images and sound recordings for webcasting, recording of the meeting and/or training purposes. (If you switch off your camera while making a representation, you will equally be deemed by the council to have consented to the sound being recorded, webcast and/or used for training purposes.)

Members of the public are welcome to make their own recordings or take screenshots of this remote meeting. The council will only seek to prevent this, should it be undertaken in a disruptive or otherwise inappropriate manner. Please see the council's filming protocol at:

<http://moderngov.southwarksites.com/ecSDDisplay.aspx?NAME=Protocol%20for%20Reporting%20and%20Filming&ID=1036&RPID=0&sch=doc&cat=13184&path=13184>

If you have any queries regarding the livestreaming or the recording of meetings, please contact the constitutional/scrutiny team on 020 7525 7420.



## Planning Committee

MINUTES of the OPEN section of the virtual Planning Committee held on Monday 29 June 2020 at 6.30pm.

---

**PRESENT:** Councillor Martin Seaton (Chair)  
 Councillor Kath Whittam (Vice-Chair)  
 Councillor Barrie Hargrove  
 Councillor Adele Morris  
 Councillor Margy Newens  
 Councillor Damian O'Brien  
 Councillor Catherine Rose  
 Councillor Cleo Soanes

**OTHER MEMBERS PRESENT:** Councillor Humaira Ali

**OFFICER SUPPORT:** Simon Bevan (Director of Planning)  
 Jon Gorst (Legal Officer)  
 Michael Tsoukaris (Design & Conservation)  
 Terence McLellan (Development Management)  
 Alex Oyebade (Transport Policy)  
 Gerald Gohler (Constitutional Officer)

### 1. APOLOGIES

There were none.

### 2. CONFIRMATION OF VOTING MEMBERS

Those members listed as present were confirmed as the voting members for the meeting.

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

The chair gave notice of the following additional papers which were circulated before the meeting, as part of supplemental agendas No.1 and No.2:

- 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 1 June 2020 be approved as a correct record of the meeting 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 can be clearly specified.

#### 6.1 40-44 BERMONDSEY STREET, VINEGAR YARD WAREHOUSE, 9-17 VINEGAR YARD AND LAND ADJACENT TO 1-7 SNOWFIELDS SE1

Planning application number: 19/AP/0404

##### PROPOSAL

*Demolition of existing buildings at 40-44 Bermondsey Street including partial demolition, rebuilding and refurbishment of existing Vinegar Yard Warehouse and erection of three new buildings (two linked) with up to two levels of basement and heights ranging from five storeys (24.2m AOD) to 17 storeys (67m AOD) to provide office space (Class B1); flexible retail space (Classes A1/A2/A3/A4); new landscaping and public realm; reconfigured pedestrian and vehicular access; associated works to public highway; ancillary servicing; plant; storage and associated works.*

The chair moved a motion to defer this item to a future meeting of the planning committee so that certain aspects of the application and its planning impact on the conservation area can be explained more fully in a future report.

This motion was seconded, put to the vote and declared carried.

**RESOLVED:**

That planning application number 19/AP/0404 be deferred to a future meeting.

**6.2 LAND BOUNDED BY ST THOMAS STREET, FENNING STREET, VINEGAR YARD AND SNOWFIELDS, INCLUDING NOS. 1-7 FENNING STREET AND NO. 9 FENNING STREET, SE1 3QR**

**Planning application number: 18/AP/4171**

**PROPOSAL**

*Redevelopment of the site to include the demolition of the existing buildings and the erection of a building up to 20 storeys in height (maximum height of 86.675m AOD) and a 3 storey pavilion building (maximum height of 16.680m AOD) with 3 basement levels across the site providing. The development would include use classes A1/A2/A3/A4/B1/D2 and sui generis (performance venue), cycle parking, servicing, refuse and plant areas, public realm (including soft and hard landscaping) and highway improvements and all other associated works.*

The committee heard the officers' introduction to the report and the addendum report. Members of the committee asked questions of the officer. At 7.30pm the meeting took a five-minute comfort break after which councillors' questions resumed.

The meeting took a five-minute break from 8pm to allow officers to share material that had been asked for.

The objectors addressed the committee, and answered questions put by the committee.

The applicant's representatives addressed the committee. At 9pm the meeting took a five-minute comfort break after which councillors asked questions of the applicant's representatives.

A supporter who lived within 100 metres of the development site addressed the meeting and responded to questions from councillors.

Councillor Humaira Ali addressed the meeting in her capacity as a ward councillor, and answered questions put by the committee.

The meeting took a five-minute comfort break at 10.07pm, which was followed by further questions put to officers by members of the committee.

Members of the committee then discussed the application.

At 10.35pm a motion was moved to exclude the public 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 of the access to information procedure rules of the constitution. The motion was seconded, put to the vote and declared carried. Following this, the meeting went into closed session until 11.15pm.

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

Following this, a motion to refuse the application was moved, seconded, put to the vote and declared carried.

**RESOLVED:**

That planning application number 18/AP/4171 be refused, because the proposal's excessive height, scale and massing would have an adverse impact on the character and setting of the Bermondsey Street Conservation Area. This is because it would adversely impact on the Horseshoe Inn and result in the loss of existing heritage assets in Fenning Street, thereby contravening Policies 3.15 Conservation of the Historic Environment; 3.16 Conservation Areas; 3.18 Setting of Listed Buildings, Conservation Areas and World Heritage Sites of the Saved Southwark Plan 2007; SP12 – Design and Conservation of the Core Strategy 2011 and Policy 7.8 - Heritage Assets and Archaeology of the London Plan 2016.

The meeting ended at 11.15pm.

**CHAIR:**

**DATED:**



<b>Item No.</b> 6.	<b>Classification:</b> Open	<b>Date:</b> 8 September 2020	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>		Development Management	
<b>Ward(s) or groups affected:</b>		All	
<b>From:</b>		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 Housing, 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 planning practice guidance (PPGs) and planning policy statements (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	Planning Department 020 7525 5403

## APPENDICES

No.	Title
None	

## AUDIT TRAIL

<b>Lead Officer</b>	Chidilim Agada, Head of Constitutional Services		
<b>Report Author</b>	Gerald Gohler, Constitutional Officer Jonathan Gorst, Head of Regeneration and Development		
<b>Version</b>	Final		
<b>Dated</b>	21 August 2020		
<b>Key Decision?</b>	No		
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>			
<b>Officer Title</b>	<b>Comments sought</b>	<b>Comments included</b>	
Director of Law and Democracy	Yes	Yes	
Director of Planning	No	No	
<b>Cabinet Member</b>	No	No	
<b>Date final report sent to Constitutional Team</b>			21 August 2020



© Crown copyright and database rights 2019 Ordnance Survey (0)100019252. Land Registry Index data is subject to Crown copyright and is reproduced with the permission of Land Registry. The default base map is OS mapping remastered by Europa Technologies.

## CONTENTS

RECOMMENDATION .....	2
EXECUTIVE SUMMARY .....	2
BACKGROUND INFORMATION.....	3
Site location and description.....	3
Details of proposal.....	5
Relevant planning history .....	9
Relevant planning history of adjoining sites .....	10
KEY ISSUES FOR CONSIDERATION.....	11
Summary of main issues .....	11
Planning policy .....	11
Emerging planning policy.....	14
Summary of public consultation responses.....	16
Principle of the development in terms of land use.....	20
Environmental impact assessment (EIA) .....	33
Trees and landscaping .....	41
Affordable housing .....	44
Impact of proposed development on amenity of adjoining occupiers and surrounding area...50	
Transport.....	61
Air quality .....	64
Planning obligations (s.106 undertaking or agreement) .....	67
Statement of Community Involvement .....	71
Consultation responses from internal and divisional consultees .....	71
Summary of consultation responses from external consultees .....	72
Community impact statement and Equalities Assessment.....	73
Human rights implications.....	74
Conclusion on planning issues .....	75

<b>Item No.</b> 6.1	<b>Classification:</b> Open	<b>Date:</b> 8 September 2020	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>	<b>Development Management planning application:</b> Application 19/AP/0864 for: Full Planning Application  <b>Address:</b> Valmar Trading Estate, Valmar Road, London, SE5 9NW  <b>Proposal:</b> Redevelopment of the site to include the demolition of the existing buildings and construction of three buildings of: 7 storeys (plus single storey basement), 6 storeys and 4 storeys across the site providing employment space with ancillary screening room and gallery space (Use Class B1), 127 hotel rooms (Use Class C1), 43 residential units (Use Class C3) and a café (Class A3); together with associated landscaping works and provision of refuse storage, cycle parking, disabled car parking and amenity space.		
<b>Ward(s) or groups affected:</b>	Camberwell Green		
<b>From:</b>	Director of Planning		
<b>Application Start Date:</b> 16/04/2019		<b>Application Expiry Date :</b> 16/07/2019	
<b>Earliest Decision Date</b> 09/11/2019		<b>Planning Performance Agreement Date:</b> 8 March 2021	

## RECOMMENDATION

1. a) That planning permission be granted, subject to conditions and the applicant entering into an appropriate legal agreement.  
  
b) In the event that the requirements of (a) are not met by 8 March 2021, that the director of planning be authorised to refuse planning permission, if appropriate, for the reason set out at paragraph 271 of this report.

## EXECUTIVE SUMMARY

2. This is a major application which seeks to redevelop an industrial trading estate to provide employment space, a 127 room hotel, a cafe and 43 residential units. The existing trading estate is not a designated employment site in the current adopted Local Plan, but is a proposal site in the draft New Southwark Plan (NSP) which requires replacement employment floorspace and new routes through the site, and also allows for the provision of new housing.
3. Following consultation, there have been 30 representations in support of the application, 27 objecting to it and two comments, and following re-consultation a further 8 representations in support and 7 objections have been received; the reasons for these are set out later in the report.

4. There would be a loss of B class floorspace as a result of the proposal, but this is considered to have been adequately justified through the submission of marketing evidence in accordance with both adopted and emerging policy. Whilst some of the industrial units were occupied when the planning application was submitted, the entire site is now vacant and a number of the units have been so for a considerable period. The proposal would deliver good quality workspace including affordable workspace, an increase in the number of jobs at the site, and a contribution towards employment and training schemes in the borough. The proposed hotel would generate footfall which would help to support Camberwell Town Centre, and the employment space would include facilities such as a screening room and exhibition space which would be open to the public and hotel guests outside of working hours.
5. All of the existing buildings on the site would be demolished, and part of one of the buildings sits within the Camberwell Green Conservation Area but it is considered to be of low quality and officers raise no objection to its demolition. New buildings on the site would be up to 7 storeys in height and would be of a high standard of design which would preserve the character, appearance and setting of this part of the conservation area. There would be new public routes through the site which would be secured through a s106 agreement.
6. The proposal would provide 14 affordable residential units which would equate to 35% by habitable room, with a policy compliant tenure split. The residential accommodation would be of a very high standard and a policy compliant mix of unit types and wheelchair accessible units would be provided. The proposal would require the removal of one tree from the site but 18 new trees would be planted which would supplement new, high quality landscaping. The daylight/sunlight and outlook impacts of the proposal development are noted, but these are not considered to be so harmful that they would outweigh the benefits of the proposal.
7. The development would provide four accessible parking spaces and a car club space, and future occupiers would be prevented from obtaining parking permits in the surrounding streets. Whilst the proposal would result in some additional vehicle trips, these would not be significant and would not adversely impact upon the surrounding road network. Cycle parking would be provided in accordance with the draft London Plan, and a condition to secure this has been included in the draft recommendation. 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 provided. 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 planning obligations would be secured, and overall the proposal is considered to be acceptable. It is therefore recommended that planning permission be granted, subject to conditions and a s106 agreement.

## **BACKGROUND INFORMATION**

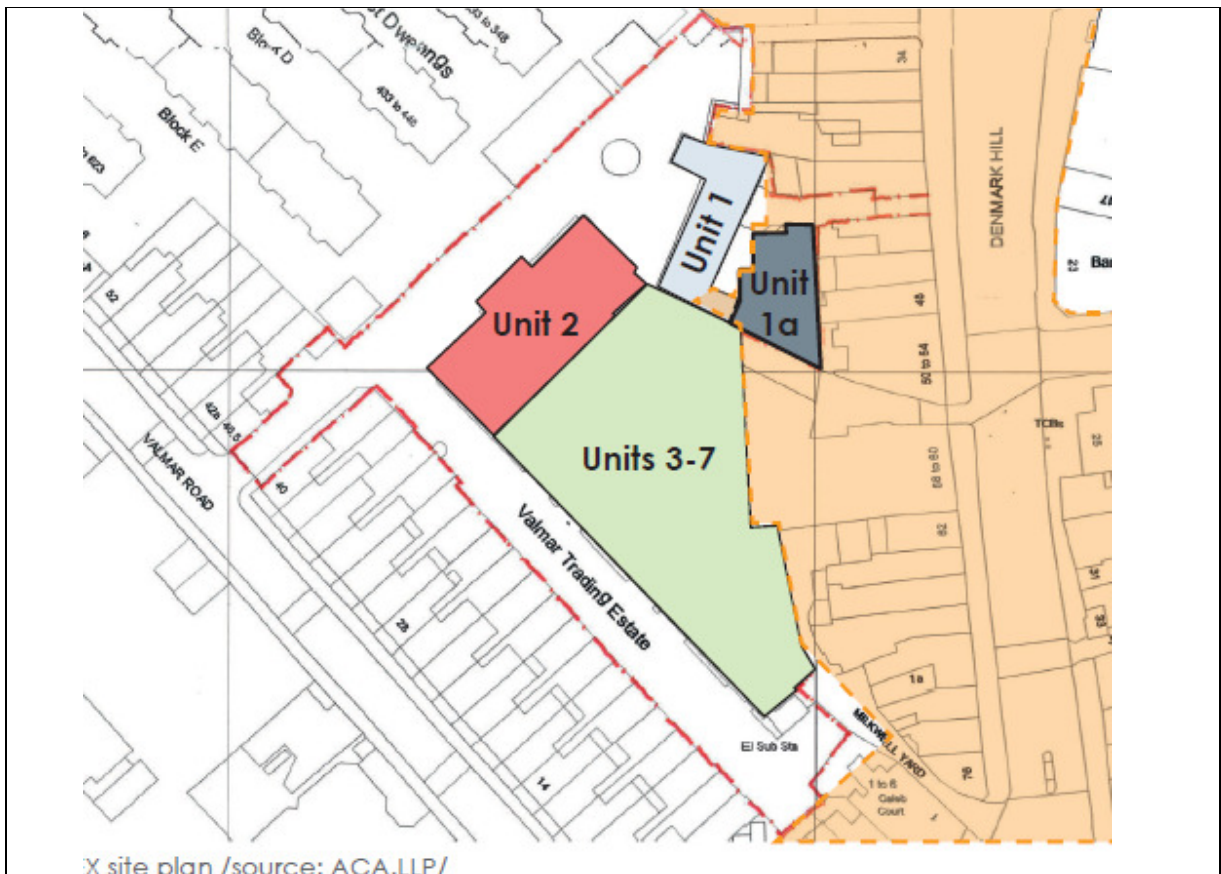
### **Site location and description**

8. The application relates to the Valmar Trading Estate which is a 0.6 hectare, broadly triangular shaped site located behind Denmark Hill. It contains eight industrial units (units 1, 1a and 2-7) and when the planning application was submitted in March 2019 units 3-6



were occupied. The entire site is now vacant however. Unit 1 is a 3-storey brick building and unit 1a is a single-storey warehouse building with brick walls and a corrugated metal roof; unit 2 is a brick building which spans basement, ground and first floor levels, and units 3-7 are a terrace of 2-storey industrial units. All of the buildings date from the 20<sup>th</sup> century.

#### Existing units



9. The only vehicular access into the site is via a gated access from Valmar Road, a predominantly residential street which also contains Crawford Primary School which has entrances from Valmar Road. There is a pedestrian access from Denmark Hill via a gated passage at 42 Denmark Hill which sits between a charity shop and a recruitment agency. It is the site's only street frontage and it leads to units 1 and 1a. There is another pedestrian entrance into the site from Milkwell Yard to the south. Milkwell Yard is effectively a cul-de-sac and also provides access to the rears of numbers 62-76 Denmark Hill.
10. To the north and east of the site are the rear of 2-3-storey properties on Denmark Hill which comprise commercial uses on the ground floor and a mix of residential and commercial uses above; the rear of 3-storey residential properties on Valmar Road adjoin the site to the south-west, and the 5-storey residential blocks of the Samuel Lewis Trust Dwellings adjoin the site to the north-west including a play area and sports court.

11. The site is subject to the following designations on the Proposals Map:

- Camberwell Green Archaeological Priority Zone;
- Urban Density Zone;
- Air Quality Management Area;
- Camberwell Action Area
- Camberwell District Town Centre (Units 1, 1a and the Denmark Hill access only);
- Camberwell Green Conservation Area (most of Unit 1a and the Denmark Hill access only).

Map showing town centre boundary



12. The site does not contain and is not within close proximity to any listed buildings.

**Details of proposal**

13. Full planning permission is sought for demolition of the existing buildings on the site and erection of a mixed-use development comprising employment space (use class B1), a 127 room hotel, and 43 residential units. It would be laid out as three blocks which are described in the application as the Main Block, Block A and Block B. Pedestrian access to the site would be from Denmark Hill and Milkwell Yard, and vehicular and pedestrian access from Valmar Road.

### Proposed site layout plan



14. **Main Block** – This block would be located in the centre of the site and would adjoin the rear of properties on Denmark Hill. It would be three to seven storeys high (maximum height 24.6m above ground) and would sit above a single-storey basement.
15. This block would contain 2,752.9sqm of employment space, the hotel and the café. At ground floor level there would be a shared hotel and workspace reception, co-working space and the café, and the intention is that the open plan co-working area and breakout space would be open to the public and hotel guests during the evenings and at weekends and this is described further in the amenity section of this report. At basement level there would be ancillary workspace facilities comprising a photography studio, meeting rooms,

a screening / conference room with capacity for around 60 seats, kitchen and plant space and again the intention is that these would be available to the public and hotel guests outside of working hours. At mezzanine level there would be 597.2sqm of artist studios to one side and hotel rooms on the other side. There would be hotel rooms on the floors above this, and work / exhibition space and a terrace on the top floor which would also be available to the public and hotel guests outside of working hours.

Materials for this block would comprise dark and light grey brick, with metal screens incorporating artwork which would be illuminated at night. The top floor would be glazed and its terrace would be enclosed by a glass balustrade.

Proposed front elevation of Main Block



16. Block A - This block would be located on the north-western part of the site, parallel with the boundary with the Samuel Lewis Trust Dwellings. It would be part 5, part 6-storeys high (a maximum of 18.74m above ground level) and would contain 694.2sqm of employment space at ground floor and mezzanine levels, and 15 residential units on the upper floors.

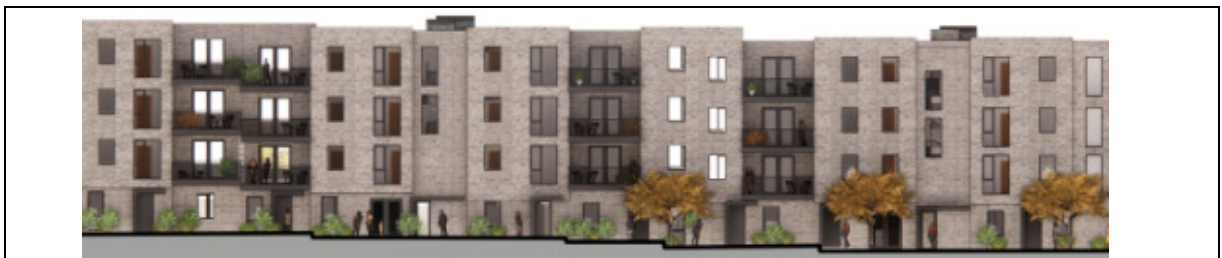
Proposed front elevation of Block A





17. Block B – This block would be located on the south-western part of the site, running parallel with the rear of the residential properties on Valmar Road. It would be part 3, part 4-storeys high (14m above ground) and it would contain 28 residential units.

Partial extract of proposed front elevation of Block B



18. The materials proposed for blocks A and B comprise dark grey brick with feature brick banding and metal balcony balustrades.
19. Five accessible parking spaces would be provided, two of which would be located near to the Valmar Road access and three towards Milkwell Yard.

Existing and proposed land uses

Land use	Existing GIA sqm	Proposed GIA sqm	Net difference GI sqm
B Class	4,847	3,447.1	-1,399.9
C1 (hotel)	0	3,717.4	+3,717.4
A3 (café / restaurant)	0	54.8 sqm	+54.8sqm
Total	4,847	7,219.3	+2, 372.3

Proposed residential unit mix

Unit Type	Private Units	Affordable Units		Total
		<i>Social rent</i>	<i>Intermediate</i>	
<b>1-bedroom</b>	7	-	-	7
<b>2-bedroom</b>	4	-	3	7
<b>3-bedroom</b>	17	9	2	28
<b>4-bedroom</b>	1	-	-	1
<b>Total</b>	29	9	5	<b>43</b>

20. Amendments

A number of amendments have been made to the proposal requiring two rounds of re-consultation. The amendments broadly comprise:

21. Main block

- Removal of one storey and reduction in mezzanine height resulting in a 3.8m height reduction overall;
- Internal reconfiguration to increase the employment floorspace;
- Introduction of a café / restaurant on the ground floor and subsequent relocation of this space;
- Removal of a car parking space for the hotel;
- Removal of one storey closest to 44-52 (evens) Denmark Hill resulting in a 3.07m reduction in height in this location.

Block A

- Ground floor changed from residential to employment space;
- Increase in the height of the block by 1.4m following insertion of mezzanine.
- Ground floor building footprint increased to provide additional employment space;
- Enlargement of balconies;
- Windows enlarged.

General – amendments to playspace provision within the scheme.

22. These changes have resulted in a 440.1sqm increase in employment floorspace, a reduction in the number of hotel rooms from 134 to 127, and a reduction in the number of residential units from 47 to 43. The second round of re-consultation also clarified the storey heights to reflect that mezzanine levels which would be provided within the Main Block and Block A would effectively be full storeys.

**Relevant planning history**

23. 19/AP/0239 - Screening Opinion under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, for the redevelopment of the site for a mixed use building up to 8 storeys in height, comprising co-working space, artist studios, 142 hotel rooms, 45 residential units and a new public route. Environmental Impact Assessment (EIA) not required.
24. 18EQ0176 - Redevelopment of the site to create a new makers quarter comprising co-working space, artist studios, new public route and 315 shared living units. Officers raised

concerns regarding a loss of employment floorspace, the principle of shared living residential accommodation, building heights and site layout / plot coverage, quality of accommodation and lack of information regarding amenity impacts and servicing.

25. 18EQ0354 - Redevelopment of the site to create a new creative hub comprising co-working space, artist studios, 161 hotel rooms, 52 residential units and a new public route. Officers noted that the site designation in the draft New Southwark Plan (NSP) does not include provision of a hotel but recognised that the site adjoins a town centre, that there are no other hotels in close proximity, and that the benefits of a hotel would need to be shown to outweigh a loss of B class floorspace. Concerns were raised regarding the height of the proposed development, amenity and transport impacts.
26. Unit 1 - 12/AP/3126 - Change of use of the ground floor unit 1 Valmar works from B1/B8 to A1/A3, involving a single storey side extension, the remodelling of the facades at ground floor level including new fenestration and a canopy, and the relocation of an existing cut through to the works. Planning permission was GRANTED in December 2012. This permission was not implemented.
27. Unit 1A - 09/AP/1849 - Erection of additional floor and external alterations including balconies to west, north and south facing elevations, in connection with change of use from antique warehouse (use class B8) to artist studios (use class B1), providing 10 No. artist studios (5 no. on each floor), and associated cycle parking and refuse storage. Planning permission was GRANTED in February 2010. This permission was not implemented.
28. Unit 2 - 11/AP/0616 – Erection of two additional floors to building, 2-storey rear extension, extension at basement level to front of building and refurbishment / remodelling of facades of existing office building (Use Class B1a), all to provide additional office floor space. Planning permission was GRANTED IN July 2011. This permission was not implemented.
29. 11/AP/3603 - Change of use from B1(c) (Light Industrial) to a micro brewery (use class B2 General Industrial), erection of two additional floors to building, 2-storey rear extension, extension at basement level to front of building and refurbishment / remodelling of facades. Planning permission was GRANTED in March 2012. This permission was implemented, but the additional 2-storeys were not constructed.

#### **Relevant planning history of adjoining sites**

30. 1A Milkwell Yard and 56-70 Denmark Hill (excluding 62 Denmark Hill)  
19/AP/2230 - Construction of part 2, part 3 storey extension to existing buildings to provide 24 new residential units (4 x studio, 6 x 1-bed, 8 x 2-bed, 4 x 3-bed and 2 x 4-bed) on the upper floors of the ground floor commercial units with communal and private amenity space'. This application was WITHDRAWN.
31. The majority of the properties along the Valmar Road terrace have planning history relating to ground floor or roof extensions. Similarly, many properties along Denmark Hill which adjoin the site have been altered in some way, either by rear extensions or changes to signage.

## KEY ISSUES FOR CONSIDERATION

### Summary of main issues

32. The main issues to be considered in respect of this application are:
- a) Principle of the proposed development in terms of land use;
  - b) Environmental impact assessment
  - c) Design of the proposal and impact upon the character and appearance of the Camberwell Green Conservation Area
  - d) Trees and landscaping
  - e) Density;
  - f) Affordable housing;
  - g) Mix of dwellings;
  - h) Wheelchair accessible housing;
  - i) Quality of accommodation;
  - j) Impact of proposed development on amenity of adjoining occupiers and surrounding area;
  - k) Transport;
  - l) Air quality;
  - m) Contamination;
  - n) Flood risk and drainage;
  - o) Sustainable development implications;
  - p) Archaeology;
  - q) Ecology;
  - r) Planning obligations (s.106 undertaking or agreement);
  - s) Mayoral and Borough Community Infrastructure Levy;
  - t) Statement of Community Involvement.

### Legal Context

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

### Planning policy

#### National Planning Policy Framework (2019)

35. The revised National Planning Policy Framework ('NPPF') was published in February 2019 which sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental.



36. Paragraph 212 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.
37. Chapter 2 - Achieving sustainable development  
 Chapter 5 - Delivering a sufficient supply of homes  
 Chapter 7 – Ensuring the vitality of town centres  
 Chapter 8 - Promoting healthy and safe communities  
 Chapter 9 - Promoting sustainable transport  
 Chapter 11 - Making effective use of land  
 Chapter 12 - Achieving well-designed places  
 Chapter 14 - Meeting the challenge of climate change, flooding and coastal change  
 Chapter 16 - Conserving and enhancing the historic environment

#### London Plan 2016

38. The London Plan is the regional planning framework and was adopted in 2016. The relevant policies of the London Plan 2016 are:
39. Policy 2.15 - Town Centres  
 Policy 4.1 Developing London's economy  
 Policy 4.4 Managing industrial land and premises  
 Policy 3.1 - Ensuring Equal Life Chances For All  
 Policy 4.5 – London’s visitor infrastructure  
 Policy 4.7 - Retail and Town Centre Development  
 Policy 3.3 - Increasing housing supply  
 Policy 3.4 - Optimising housing potential  
 Policy 3.5 - Quality and design of housing developments  
 Policy 3.6 - Children and young people’s play and informal recreation facilities  
 Policy 3.8 - Housing choice  
 Policy 3.9 - Mixed and balanced communities  
 Policy 3.11 - Affordable housing targets  
 Policy 3.12 - Negotiating affordable housing on individual private residential and mixed use schemes  
 Policy 3.13 - Affordable housing thresholds  
 Policy 5.1 - Climate change mitigation  
 Policy 5.2 - Minimising carbon dioxide emission  
 Policy 5.3 - Sustainable design and construction  
 Policy 5.7 - Renewable energy  
 Policy 5.10 - Urban greening  
 Policy 5.11 - Green roofs and development site environs  
 Policy 5.12 - Flood risk management  
 Policy 5.13 - Sustainable drainage  
 Policy 5.15 - Water use and supplies  
 Policy 5.21 - Contaminated land  
 Policy 6.3 - Assessing effects of development on transport capacity  
 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 7.5 - Public realm  
 Policy 7.6 - Architecture  
 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

40. The Core Strategy was adopted in 2011 providing the spatial planning strategy for the borough. The strategic policies in the Core Strategy are relevant alongside the saved Southwark Plan (2007) policies. The relevant policies of the Core Strategy 2011 are listed below, and the Core Strategy also sets out the vision for Camberwell Action Area which includes protecting the town centre, encouraging the reputation of the area as a creative place, and protecting and supporting small businesses.
41. Strategic Policy 1 - Sustainable development  
 Strategic Policy 2 - Sustainable transport  
 Strategic Policy 3 – Shopping, leisure and entertainment  
 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)

42. In 2013, the council resolved to 'save' all of the policies in the Southwark Plan 2007 unless they had been updated by the Core Strategy with the exception of Policy 1.8 (location of retail outside town centres). Paragraph 213 of the NPPF states that existing policies should not be considered out of date simply because they were adopted or made prior to publication of the Framework. Due weight should be given to them, according to their degree of consistency with the Framework. The relevant policies of the Southwark Plan 2007 are:
43. Policy 1.1 – Access to employment opportunities  
 Policy 1.4 – Employment sites outside the preferred office locations and preferred industrial locations  
 Policy 1.5 – Small business units  
 Policy 1.7 – Development within town and local centres  
 Policy 1.2 – Hotels and visitor accommodation  
 Policy 2.5 - Planning obligations  
 Policy 3.1 - Environmental effects

Policy 3.2 - Protection of amenity  
 Policy 3.3 - Sustainability assessment  
 Policy 3.4 - Energy efficiency  
 Policy 3.6 - Air quality  
 Policy 3.9 - Water  
 Policy 3.11 - Efficient use of land  
 Policy 3.12 - Quality in design  
 Policy 3.13 - Urban design  
 Policy 3.14 - Designing out crime  
 Policy 3.15 – Conservation of the historic environment  
 Policy 3.16 – Conservation areas  
 Policy 3.18 – Setting of listed buildings, conservation areas and world heritage sites  
 Policy 3.19 - Archaeology  
 Policy 3.28 - Biodiversity  
 Policy 3.31 - Flood defences  
 Policy 4.2 - Quality of residential accommodation  
 Policy 4.3 - Mix of dwellings  
 Policy 4.4 - Affordable housing  
 Policy 4.5 - Wheelchair affordable housing  
 Policy 5.2 - Transport impacts  
 Policy 5.3 - Walking and cycling  
 Policy 5.6 - Car parking  
 Policy 5.7 - Parking standards for disabled people and the mobility impaired

#### Supplementary Planning Guidance and Documents

44. Sustainable Design and Construction SPD February (2009)  
 Sustainable Transport SPD (2010)  
 Camberwell Green Conservation Area Appraisal (2010)  
 Affordable Housing SPD (2008) and Draft Affordable Housing SPD (2011)  
 GLA Shaping Neighbourhoods: Play and informal recreation SPG 2012  
 GLA Sustainable Design and Construction SPG 2014  
 2015 Technical Update to Residential Design Standards SPD (2015)  
 Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD (2015)  
 Development Viability SPD (2016)  
 GLA Affordable Housing and Viability SPD (2017)  
 GLA Energy Assessment Guidance (2018)

#### **Emerging planning policy**

##### Draft New London Plan

45. The draft New London Plan was published on 30 November 2017 and the first and only stage of consultation closed on 2nd March 2018. Following an Examination in Public, the Mayor then issued the Intend to Publish London Plan, which was published in December 2019.
46. The Secretary of State responded to the Mayor in March 2020 where he expressed concerns about the Plan and has used his powers to direct changes to the London

Plan. The London Plan cannot be adopted until these changes have been made.

47. The draft New London Plan is at an advanced stage. Policies contained in the Intend to Publish (ItP) London Plan published in December 2019 that are not subject to a direction by the Secretary of State carry significant weight. Paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.
48. New Southwark Plan
- For the last 5 years the Council has been preparing the New Southwark Plan (NSP) which will replace the saved policies of the 2007 Southwark Plan and the 2011 Core Strategy. The Council concluded consultation on the Proposed Submission version (Regulation 19) on 27 February 2018. The New Southwark Plan Proposed Submission Version: Amended Policies January 2019 consultation closed in May 2019. These two documents comprise the Proposed Submission Version of the New Southwark Plan.
49. These documents and the New Southwark Plan Submission Version (Proposed Modifications for Examination) were submitted to the Secretary of State in January 2020 for Local Plan Examination. The New Southwark Plan Submission Version (Proposed Modifications for Examination) is the Council's current expression of the New Southwark Plan and responds to consultation on the NSP Proposed Submission Version.
50. In April 2020 the Planning Inspectorate provided their initial comments to the New Southwark Plan Submission Version. It was recommended that a further round of consultation take place in order to support the soundness of the Plan. Consultation is due to take place on this version of the NSP between June and August 2020. The final updated version of the plan will then be considered at the Examination in Public (EiP).
51. It is anticipated that the plan will be adopted in early 2021 following the EiP. As the NSP is not yet adopted policy, it can only be attributed limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.
52. Proposal site designation NSP24 in the draft NSP covers the application site, but does not include the pedestrian route into the site from Denmark Hill. NSP24 advises that the existing uses comprise 3,982sqm of B1(c) floorspace (light industrial) and that redevelopment of the site must:
- Provide at least the amount of employment floorspace (B1 use class) as currently on the site; and
  - Provide a new east-west green link from Denmark Hill to Valmar Road.
- Redevelopment of the site should:
- Provide new homes (C3).
53. The detailed guidance advises that the site is suitable for a mixed use development which provides at least as much employment floorspace as currently exists on the site.

Redevelopment should create a new walking route between Valmar Road and Denmark Hill to enhance accessibility to the proposed Camberwell Station. It advises that Milkwell Yard provides an opportunity to provide improved connectivity for pedestrians.

54. Also of note is that it is proposed to amend the boundary of Camberwell Town Centre through the NSP, and the entirety of NSP24 would sit within the new town centre boundary.

### **Summary of public consultation responses**

55. A total of 59 representations were received in response to the first round of consultation, carried out in May 2019.

56. 30 representations were received in support of the application for the reasons set out below:

57. Land uses

- Provision of affordable housing and would help to address housing shortage;
- Job creation;
- Provision of affordable workspace;
- Lack of high quality hotels in the area;
- Artist studios, gallery and community space included;
- Lack of artist studios in the area;
- The developer would operate the site and not let it out to chains;
- Local artist who wishes to rent one of the studios;
- Will bring more visitors, residents and consumers to the area which will boost the high street which has vacant units;
- Better than other proposals in the area and more aligned with the Camberwell area plan.

58. Design

- Similar to existing heights in the area and would not be particularly visible;
- High quality design;
- Site is currently derelict and unattractive;

59. Amenity

- Will improve security in the area including for the houses backing onto the site and in Milkwell Yard which experiences anti-social behaviour;
- Support the proposal but have concerns regarding loss of light and privacy.

60. Transport

- Could help with the case for re-opening Camberwell Station;
- Support car - free development;
- Would improve pedestrian links;

- Would reduce industrial traffic on Valmar Road;
- Support the proposal but traffic and deliveries must be restricted;

61. Consultation

- Good community consultation undertaken before planning application submitted;

62. Submission from Camberwell Arts

- Proposal will enhance Camberwell Art's aims of supporting the work of local artists and bringing art to local people;
- Will have significant cultural and public benefits and will improve Denmark Hill by bringing more visitors to the area;
- Camberwell is well known for arts but lacks affordable space for local artists;
- Hotel will boost local businesses;
- Camberwell Arts will work with the developer to help curate the arts space within the development.

63. Submission from Theatre Peckham

- Positive addition to the creative and cultural landscape of the area;
- Will provide opportunities for local people including young people;
- Proposed workspace will allow for partnerships with local entrepreneurs rather than those from further afield;
- Will help to make Camberwell a destination rather than a thoroughfare;
- Theatre Peckham will be able to direct theatre-goers to the proposed hotel accommodation which aligns with the theatre's creative values and which will showcase the work of local artists.

64. Submission from Black British Female Artists Collective (who have worked with the developer on the design of the artist studios in the scheme).

- Would help to address the lack of affordable and comfortable workspace in the area;
- The applicant has sought input from the Collective on the design of the proposal, demonstrating their commitment to the scheme;
- Proposal would help artists to foster long term careers;
- Proximity to the South London Gallery, University of the Arts London and Camberwell Arts;
- Would help to promote Black and Minority Ethnic artists;
- Opportunities for workshops with the community and local schools;
- Working on the design of the hotel interior would help artists within the Collective to build sustainable careers;
- Hotel brings opportunities for cultivating art sales and new business opportunities.

65. 27 representations were received objecting to the application for the reasons set out

below:

#### Land uses

- Should include more facilities for the local community;
- Lack of demand for housing in the area and all the housing should be affordable;
- Impact on schools and GP surgeries;
- Hotel not listed in the NSP site designation;
- There are many hotel rooms in the area with limited demand, and the proposal would put other hotels out of business;
- The Mayor's target for hotel rooms has already been exceeded;
- Question how the hotel would be used if there were low demand, including as emergency residential accommodation for the Council;
- Contrary to an Article 4 Direction in place which prevents change of use from light industrial space to residential;
- Site should be used to expand Crawford primary school;
- No need for a cinema as there are cinemas at Peckham and Brixton;

#### 66. Design

- Buildings too high and out of keeping with the area;
- Grey brick not in keeping with the area;
- Proposal is too dense;
- Impact upon protected view to St Pauls;

#### 67. Amenity

- Loss of daylight, sunlight and overshadowing including to play area within Samuel Lewis Trust Dwellings;
- Loss of privacy;
- Would build on boundary wall and block redevelopment potential of 46 Denmark Hill;
- Anti-social behaviour and information required as to how this would be managed;
- Music in the outside areas around the hotel must be prevented;
- Increase in litter and fly tipping;
- Request a 24 hour on-site contact during construction and operation of the development;
- Noise and odour from plant;
- Loss of property value (officer response- this is not a material planning consideration);

#### 68. Transport

- Increased traffic and parking demand and including at school drop-off / pick up times;
- Pressure on public transport;
- Transport Assessment is flawed because it assumes the trading estate is operating at full capacity but it has been underused for a long time;

- Impact of construction traffic including potential vehicle waiting area;
- Inadequate vehicular access including for servicing requirements and emergency vehicles;
- Question whether the site could be accessed from Coldharbour Lane;
- Servicing hours should be restricted;
- Use of coaches;
- Refuse storage locations impractical in terms of collections;
- No defined servicing area so the site would become cluttered with vehicles;
- Access routes must be lit and maintained to a high standard;
- Pavement required into the site from Valmar Road;
- Controlled Parking Zone (CPZ) hours should be extended to cover evenings and weekends.

69. Environmental impacts

- Increased pollution;
- Sewers unlikely to be able to cope with additional waste;
- Impact upon water pressure;
- Impact upon gas and electricity supplies;
- Proposal likely to cause flooding.

70. Consultation

- Council did not consult hotel operators in the area.

71. Two comments have been received on the application as follows:

- Welcome the proposal but have concerns regarding traffic generation, question whether vehicle trips are one or two way, congestion on Valmar Road, another hotel is planned in the area, lack of parking, loss of light and privacy and construction impacts.
- Residents on Milkwell Yard should be given priority for using services on the estate;

72. Re-consultation

Following the first set of amendments to the application re-consultation was undertaken on 19<sup>th</sup> September 2019 and 8 representations in support and 7 representations objecting to the proposal were received, with the reasons as set out above.

Following the second set of amendments to the application re-consultation was undertaken on 13 July 2020. Three further representations were received in support of the application and the only new issue raised is that the new routes through the site would reduce commuting time for local residents.

Five further objections were received which raised the following new issues:

- Lack of demand for a hotel due to Covid-19 and it could be used as a House in Multiple Occupation;
- The area cannot sustain two new hotels in an area which previously had no hotels of



this size;

- Insufficient housing on the site;
- The scheme is not viable which could lead to corners being cut, including in relation to the removal of asbestos from the existing buildings;
- Construction impacts when more people are likely to be working from home due to Covid-19;
- Land contamination.

### **Principle of the development in terms of land use**

73. Section 6 of the NPPF 'Building a strong, competitive economy' states that planning policies and decisions should help to create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses, and address the challenges of the future.
74. Policy 4.1 of the London Plan sets out the Mayor's requirements for developing London's economy, including promoting and enabling the continued development of a strong, sustainable and diverse economy across all parts of the city. Policy 4.4 relates to the management of industrial land and premises including undesignated industrial sites such as the application site. Policy E7 of the draft London Plan relates to mixed-use development on non-designated industrial sites.
75. At borough level the Core Strategy vision for the Camberwell Action Area is to protect the town centre by improving current shops, encouraging its reputation as a creative place clustering around Camberwell College of Arts to provide employment, protecting and encouraging small businesses, and improving sustainable modes of transport. Strategic policy 10 of the Core Strategy seeks to protect existing business floorspace and supports the provision of around 25,000sqm - 30,000sqm of additional business floorspace to help meet general demand for office space in a number of locations, including town and local centres and in the Camberwell Action Area. Saved Southwark Plan policy 1.4 seeks to protect undesignated employment sites in certain locations and sets out criteria for assessing applications where there would be a loss of employment floorspace. Saved policy 1.5 is also relevant which encourages the provision and requires the replacement of small business units.
76. As set out in the planning policy section of this report, site designation NSP24 in the draft NSP requires at least the amount of existing employment space to be re-provided which is given as 3,982sqm of B1 (c) space (light industrial), and it states that redevelopment of the site should provide new homes. Also of relevance is policy P29 'Office and business development' of the draft NSP which seeks to protect existing employment space in locations including town and local centres. It only allows the loss of employment floorspace following a marketing evidence and further justification, and subject to a contribution towards the provision of jobs and training schemes in the borough.
77. Concerns have been raised following public consultation on the application that the proposal would conflict with an Article 4 Direction which is in force which prevents a change of use from B1(c) light industrial uses to C3 residential uses under permitted

development rights i.e. without the need for planning permission. The Direction was confirmed by the Council in March 2018 and includes the application site. However this Direction simply removes the right to change the use without applying for planning permission; in this case, an application is being made to redevelop the site so a conflict with the Article 4 Direction does not apply. It is also noted that the site is designated for mixed use purposes in the draft NSP.

78. Loss of B class floorspace - There is currently 4,847sqm of B class floorspace on the site which is higher than the figure given in the draft NSP site designation which is based on estimates taken from GIS mapping. The NSP site designation also states that the existing floorspace is B1 (c) 'light industrial', but the application documents state that units 3-6 which were the only units occupied when the planning application was submitted were predominantly used for storage. A permission for B2 use (general industrial) was implemented in unit 2, although this unit is now in a very poor condition.

79. The breakdown of the existing space across the site is as follows:

Existing B class floorspace

Unit	Floorspace (GIA)	Occupier when application submitted	No. of employees when application submitted
1	661.8sqm	Vacant	0
1a	257.2sqm	Vacant	0
2	1,486.1sqm	Vacant	0
3	448.8sqm	Mitie Cleaning and Environment	16 warehouse operatives at units 3-6.
4	804.2sqm	Ad Events International	As above
5	469.3sqm	Rocket Van	As above
6	351.8sqm	Kings College Hospital NHS Trust	As above
7	367.8sqm	Vacant	0
<b>Total</b>	<b>4,847sqm</b>		

80. The proposed development would provide 3,447.1sqm of employment floorspace which would be 1,399.9sqm less than the existing, or a 71% re-provision. This loss of B class floorspace would not comply with the draft NSP site designation, and the applicant has sought to justify this through the submission of marketing evidence in accordance with saved policy 1.4 of the Southwark Plan and policy P29 of the draft NSP.
81. Saved policy 1.4 of the Southwark Plan affords protection to existing B class floorspace in certain locations, including on sites which front or have direct access to a classified road. The site has direct access (albeit through a narrow and headroom-restricted passageway) to Denmark Hill which is classified, therefore this policy is applicable. The policy sets out the circumstances in which a loss of B class floorspace will be permitted including where there is evidence of 24 months of marketing to seek to dispose of the premises for continued B class use or mixed-use including B class; where the site would be unsuitable for continued B class use or redevelopment

including B class; or where the site is located in a town centre whereby A class uses can replace B class space.

82. A marketing report has been submitted with the application in respect of units 1, 1a and 2 which together provide 2,405sqm of floorspace. The report has been compiled by One Click Commercial which it advises has over 20 years experience of commercial lettings in London, including Southwark. The report advises that the units have been vacant since 2012, and were purchased by the current owner in October 2014. Since that time they have been continuously marketed, initially by Changing Properties until March 2016 and then jointly with One Click Commercial up until the present time. The units were offered individually or together, and on a long lease or short-term flexible basis with an emphasis on the ability to redevelop them to suit a range of B class occupiers given their current poor condition.
83. Both marketing companies employed a range of measures to secure a tenant including:
- Marketing boards displayed on the site and at the site entrance;
  - Use of commercial property portals such as Zoopla, Rightmove, property link and estatesgazette.com,
  - Direct approaches to existing clients looking for premises via telephone and email;
  - Listing the units on the company websites from April 2016;
  - Premium online advertisements to raise the profile of the units;
84. The marketing report advises that the units are dilapidated and in a very poor condition, requiring extensive refurbishment and / or redevelopment. Issues identified include flood damage, rotting, rusting, mould and structural damage. A steel staircase within Unit 1 is showing signs of corrosion, Unit 1a has poor loading access through a single panel door, and most of the ground floor of Unit 2 was removed during its previous use as a brewery. The marketing agents advised the owner that rather than refurbish the units which could limit the pool of potential occupiers, they should be offered on attractive terms to enable occupiers to fit them out to meet their own requirements. The terms on which they were offered included a rent-free period of up to two years, with the owner paying basic refurbishment costs and the tenant to provide the fit out.
85. In spite of marketing the units for 35 months, only 23 enquiries were received. The only tenant found was Deliveroo which occupied some of the external yard to Unit 1 in 2017, but subsequently vacated the site following enforcement action by the Council. The conclusion of the marketing report is that in spite of the terms offered, a significant investment is required in order to bring the units back into useable condition and that it would be commercially unviable for the owner to do this given the relatively low rental values which could be expected.
86. The marketing report has been reviewed by the Council's Regeneration Division and the advice received is that the size and location of the units are such that potential tenants (start ups and very small businesses) are unlikely to have the capital to invest in bringing the units up to occupational standards, and rather than accepting a lease with the risk of refurbishment costs, they would likely opt to pay a higher rent for premises from which they can trade immediately. As rents are likely to fall as a result of the current Covid 19 emergency and economic risk will be higher, the refurbishment

of the units from an owner's perspective would not be viable, and small businesses would be even less likely to invest in refurbishment costs.

87. Given the extensive marketing of these units for a period well in excess of the 24 month policy requirement, the reduction in B class floorspace is considered to have been adequately justified in this instance. It is noted that unit 7 has been vacant since March 2018. This unit is in different ownership and was last used for storage and distribution. It is in a useable condition and has been marketed through on site boards, email campaigns and online listings as per units 1, 1a and 2 but no tenant has been found. To mitigate the loss of B class floorspace a s106 contribution of £6,645.45 would be secured through the s106 agreement towards employment and training schemes in the borough, in accordance with the Council's adopted Section 106 Planning Obligations and Community Infrastructure Levy SPD.
88. Retention of existing businesses - Policy P30 of the draft NSP 'Affordable workspace' requires development to retain small and independent businesses on a site and where they are at risk of displacement, to provide suitable affordable workspace for them within the completed development. Policy P32 of the draft NSP 'Business Relocation' requires applicants to provide a business relocation strategy in consultation with affected businesses which must set out viable relocation options.
89. As stated units 3-6 were occupied when the planning application was submitted, and the applicant has provided a Draft Business Relocation Strategy; details of the businesses which formerly occupied these units are set out below:
- Unit 3 – This unit was used by Mitie Cleaning and Environment for storage and distribution. Mitie Cleaning is one of the UK's largest cleaning companies, servicing several private and public sector companies. It has several premises around the country, including in London. After an initial letter in April 2019 the applicant contacted the business again in May 2019, and the business advised that they did not wish to extend their lease.
90. Unit 4 - This unit was occupied by Ad Events which makes booths and sets for exhibitions. Discussions with this business took place in May 2019 and the business advised that of the 804sqm of space which they occupied, around a third was used for making props / stands and the remainder was used for storage. The business advised that they were planning on moving their storage outside the M25, and required a much smaller space for making the sets. This could potentially be accommodated within one or two of the units in Block A, and the applicant offered to assist the business in finding temporary accommodation in the interim. During further discussions in June 2019 the business advised that they had found a new premises and would vacate the site at the end of the lease term, but would consider a potential move back to the site closer to practical completion of the proposed development. The applicant intends to contact the business around this time and it is recommended that this be secured through the s106 agreement. In the event that this business wishes to return to the site the s106 agreement should ensure that it is prioritised for affordable workspace which is detailed further below.
91. Unit 5 – This unit was used for storage by Rocket Van, a van hire and courier service, and the office element of the business could be accommodated within the proposed development. Rocket Van appointed an agent to assist them in finding a new

premises and in May 2019 the agent advised that Rocket Van was expanding and would require a lot more space for vehicles in the future. This could not be accommodated in the proposed development as it would require large amounts of hardstanding and shed space. As Rocket Van had appointed their own agent they did not take up the applicant's offer of help to find a new premises or to extend their lease, and the business has not expressed any interest in returning to the site.

92. Unit 6 – This unit was occupied by King's College Trust which used it for storage. The applicant received no response to an initial letter sent in April 2019 and was unable to reach anyone at the Trust to discuss their business requirements. The lease subsequently expired and the unit was vacated.
93. The intention of the business relocation policy is that space is designed with existing businesses in mind, to enable them to remain on a site. In this instance the businesses were contacted after the planning application had been submitted, i.e. when the scheme had already been designed. However, whilst this is noted, the units were predominantly used for storage and re-providing storage space on the site would limit the potential number of jobs which the scheme could support. Only one of the former occupiers has expressed a desire to potentially return to the site within completed development, and this could be facilitated through the s106 agreement.
94. Proposed B class floorspace - The proposed development would provide three types of B1 space comprising 1,324sqm of co-working space (B1a), 597.2sqm of artist studios (B1c) and 831.7sqm of ancillary facilities within the Main block, and 694.2sqm of maker space (B1c) within Block A and these are described in more detail below. The submission advises that the workspace within the development has been designed in consultation with Camberwell College of Arts and the Black British Female Artist Collective.
95. The co-working space would be provided at ground and top floor level within the Main block and could accommodate desks for up to 100 people. It would comprise a mix of individual rooms which could be rented by businesses, banks of communal desks and breakout spaces. The desks would be let on a flexible basis for an all inclusive monthly fee or a day pass, and this would include Wifi, furniture, printers and access to meeting rooms and break out spaces.
96. An earlier iteration of the plans showed the café in the back corner of the ground floor with no separation from the workspace, and officers raised concerns that this could lead to the co-working break out space becoming a large café / bar and not a genuine workspace. In response to this the applicant has identified a number of examples where large hotel lobbies are used jointly as work and hotel space including Citizen M on Lavington Street and Green Rooms in Wood Green, although these hotels do not appear to have rentable co-working space, only meeting rooms and large café/bars where people are able to work. Revisions to the plans to relocate the café to the outer edge of the building to enable it to be physically separated from the workspace have helped to allay these concerns, although part of the of the co-working break out space could still need to be used to serve hotel breakfasts given that the café could only accommodate 40-50 covers and the proposed layout would allow for this. It is recommended that the s106 agreement requires a workspace marketing and

management plan to be submitted for approval which would allow the breakout space to be used by hotel guests and members of the public up until 10am and after 5pm on weekdays, with priority for this space for people working at the site during working hours. The workspace marketing and management plan should also prioritise the basement ancillary facilities for people working on the site during the working week, whilst enabling it to be used by the local community and hotel guests during the evenings and at weekends. Whilst the shared nature of some of the spaces would lead to a blurring of some of the hotel and workspaces, it would allow the space to be used efficiently throughout the day, and in the spirit of the more flexible use classes being promoted in recent legislative changes.

97. The artist studios would be provided at mezzanine level. They are shown laid out as 14 separate units ranging from 18.1sqm to 57.5sqm in size, although the sizes could be adapted to suit end user requirements.

Proposed mezzanine floorplan

---



98. The proposed maker space would be provided at ground floor and mezzanine level within Block A. It would comprise four individual units ranging from 80.2sqm to 133.2sqm in size which would incorporate a kitchenette, WC and internal cycle storage. They would have floor to ceiling heights of 2.5m which would not be particularly high for a commercial unit, although the mezzanines could potentially be omitted if not required by a specific end user, although this would reduce the overall amount of floorspace. The plans show double doors into the units and these could be

made larger to make them more suitable for moving goods and materials in and out if required. The middle two units would also include knock-out panels so they could be changed to a single, larger unit if required by future occupiers and these design features should be secured through the s106 agreement.

99. Ancillary facilities would be provided in the basement of the Main Block including a photography studio, recording rooms, a conference / screening room and a number of meeting rooms. These facilities would be available to those working within the three different types of workspace across the site, not just the co-working space and this should be secured through the s106 agreement. These facilities would also be available to the public outside of working hours, and this is considered further later in the report. Overall the proposed workspace is considered to be of a good standard, and the different types of spaces proposed would comply with policy P29 of the draft NSP which requires employment floorspace in allocated sites to include a range of employment spaces. In order to secure this policy requirement a condition is recommended requiring the specified quantum of B1c floorspace to be delivered and for details of the fit out to be provided. The s106 agreement should require all of the workspace to be completed before the hotel can be occupied.
100. Job creation - At the time the application was submitted there were 16 people employed at the site, all of whom were warehouse operatives working in units 3-6; this relatively low number is on account of these units having been used predominantly for storage. The Council's Local Economy Team (LET) has advised that the likely number of jobs which the proposal would generate would be 303 full time equivalent jobs, with 260 from the workspace and 43 from the hotel and café; although temporary, around 360 construction jobs would be created. Clauses in the s106 agreement would secure a proportion of construction jobs and jobs within the completed development for unemployed Southwark residents.
101. Provision of affordable workspace – Policy E3 of the draft London Plan supports the use of planning obligations to secure affordable workspace. Policy P30 of the draft NSP states that developments proposing 500sqm GIA or more employment floorspace (B class use) must:
- Deliver at least 10% of the proposed gross employment floorspace as affordable workspace on site at discount market rents; and
  - Secure the affordable workspace for at least 30 years; and
  - Provide affordable workspace of a type and specification that meets current local demand;  
and
  - Prioritise affordable workspace for existing small and independent businesses occupying the site that are at risk of displacement. Where this is not feasible, affordable workspace must be targeted for small and independent businesses from the local area with an identified need; and
  - Collaborate with the Council, local businesses, business associations and workspace providers to identify the businesses that will be nominated for occupying affordable workspace.

If it is not feasible to provide affordable workspace on site, an in lieu payment will be



required for off site affordable workspace.

102. Policy P30 has been informed by a number of studies which form part of the evidence base for the NSP. Of particular note is the 'London Borough of Southwark Affordable Workspace Support – Evidence of Needs' study by Avison Young dated December 2019. This report considers the different types of affordable workspace needed in different parts of the borough, and considers the viability impacts of delivering affordable workspace and what rent levels would be considered affordable. In the Camberwell area the report advises that studios, maker space, light industrial space and the retention of existing space would be appropriate. It advises that there should be peppercorn rents on 10% of the space staircasing up to £20 per square foot, and that this would be viable for most schemes. To that end, the following has been agreed for the affordable workspace and this would be secured through the s106 agreement:
103. - 10% affordable workspace (345sqm) would be provided comprising maker space within Block A;  
 - The affordable workspace would be secured for a 30 year term and the same occupier could remain for the entire period;  
 - Rent would be 48% of market rent inclusive of service charge for the 30 year term, which currently equates to £12 per square foot;  
 - Flexible leases;  
 - Applicants must either have an existing business in Southwark or be a resident of Southwark and the proposed use must be from a specific sector which has a social, cultural or economic development purpose;  
 - During the construction period, a database of interested parties will be compiled and maintained;  
 - On completion, the units will be marketed using a website, newspapers, agencies, managing agent, database, and external signage. Units would be actively marketed for nine months to Southwark businesses and residents. Only if the units remain unoccupied after this period of marketing will the units be made available to the same types of businesses outside of Southwark which would be permitted to remain in the affordable space, paying affordable rent, for up to five years. After those five years, the process would start again. During this time the existing tenant could remain until a suitable Southwark tenant is found;  
 - The day to day management of the units would be carried out by a suitably competent management company.

A condition would secure the fit out of the affordable workspace including mechanical and electrical fit-out of the units, heating and cooling provision, sprinklers, and the provision of kitchen and toilet facilities

104. **Provision of residential use**

Section 5 of the NPPF sets out the government's approach to the delivery of new homes which includes requiring housing policies to deliver a broad range of housing types needed by different groups. London Plan Policy 3.3 'Increasing Housing Supply' sets a minimum target of 27,362 additional homes to be provided in Southwark between 2015-2025. Strategic policy 5 of the Core Strategy seeks high quality new homes in attractive environments. It states that development will provide as much housing as possible, whilst also making sure that there is enough land for other types of development. The draft NSP sets a target of 23,550 net new homes by 2028/2029 in line with the draft London Plan, and a key objective of the overall development plan is to provide as much new housing as possible and to create places where people would want to live.

Concerns have been raised during public consultation on the application that there is no need for more housing in the area, and that the site would be better used for expanding Crawford Primary School. However, there is a pressing need for more housing in the borough and London, hence the need for housing targets as set out in the policies outlined above. The provision of residential units on the site would also be in accordance with the draft NSP site designation and as such is considered to be acceptable in principle. The need for additional primary school places has been considered through the draft NSP preparation and informed by regular monitoring of the demand for school places. A Cabinet report entitled 'Pupil Place Planning' dated 29<sup>th</sup> October 2019 forms part of the NSP evidence base and advises that Southwark currently has sufficient places to meet demand in the primary and secondary phases of education, and that demand for primary school places will continue to decline, but will slowly increase towards the end of the next decade.

105. **Provision of a hotel** - The proposed development would include a 127 room hotel which would occupy the majority of the Main Block. A number of representations have been received in support of the hotel on the basis of job creation, a boost to existing businesses, and a lack of high quality hotels in the area. Representations received objecting to the proposed hotel include a lack of demand, it would put other hotels in the area out of business, and the draft NSP site designation does not include a hotel. A concern has also been raised that other hotel operators in the area were not consulted on the planning application, but consultation on planning applications is based on proximity to the site, and it there are no hotels within close proximity to the site.
106. Units 1 and 1a within the estate are located in Camberwell District Town Centre; the remainder of the site sits outside of it. Section 7 of the NPPF 'Ensuring the vitality of town centres' requires Local Planning Authorities to apply a sequential test to planning applications for main town centre uses (which includes hotels) which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should first be located in town centres, then in edge of centre locations, and only if suitable sites are not available or expected to become available within a reasonable period should out of centre sites be considered. When considering edge and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre.
107. Policy 2.15 of the London Plan 'Town Centres' sets out the strategic requirements for town centres, including sustaining and enhancing the vitality and viability of the centre.

Policy 4.5 of the London Plan relates specifically to hotels and sets a target of 40,000 net additional hotel bedrooms by 2036, of which at least 10% should be wheelchair accessible. It advises that new visitor accommodation should be in appropriate locations including town centres where there is good access to public transport, and that further intensification of hotel provision in areas of existing concentration should be resisted, except where it would not compromise local amenity or the balance of local land uses. The draft London Plan revises this figure upwards and advises that an additional 58,000 bedrooms of serviced accommodation will be required in London by 2041, to be directed towards the Central Activities Zone (CAZ) and town centres. This figure is informed by Working Paper 88 'Projections of demand and supply for visitor accommodation in London to 2050 (April 2017) which estimates that 1,795 of the rooms will be required in Southwark.

108. At borough level strategic policy 10 of the Core Strategy advises that hotels will be permitted in town centres, the strategic cultural areas and places with good access to public transport services provided they do not harm the local character. Saved policy 1.12 of the Southwark Plan advises that hotels and other visitor accommodation will be encouraged in areas with high public transport accessibility; hotels and visitor accommodation will not be permitted where they would result in a loss of existing residential accommodation or an over dominance of visitor accommodation in the locality. Policy 40 of the draft NSP states that development for hotels and other forms of visitor accommodation must ensure the design, scale, function, parking and servicing arrangements respond positively to the local character and protect the amenity of the local community and visitors to the hotel. Of note is that this draft policy does not require hotels to be located in town centres.
109. With regard to its location, based on the current adopted plan most of the hotel would occupy an edge of centre site, sitting just outside the town centre designation. Whilst there are three other NSP proposal sites which are within the existing town centre boundary, none of these are within the applicant's ownership. The first is Butterfly Walk Shopping Centre (NSP23). This site is being brought forward for development by others, and is subject to a planning application for redevelopment including a 101 room hotel which is currently being assessed. The second is the Abellio Walworth Depot (NSP26), part of which sits within the current town centre boundary. This site is still in active use as a depot and there is currently no indication as to if and when it may be brought forward for redevelopment. The third site is Camberwell Magistrates Court (NSP32) which sits wholly within the current town centre boundary. Whilst this site is likely to be brought forward for redevelopment by others, there is no current planning application.
110. Where a site is located at the edge of a town centre it should be well connected to it, and in this instance the site has direct access to the town centre via the Denmark Hill route. Although the hotel would not have a direct street frontage, most hotel bookings are undertaken online and less frequently rely on passing trade. It would also benefit from a quieter location which could make it more attractive to some guests than if it were on a main road. The site has a high PTAL and the proposal would not result in a loss of existing residential accommodation, so in these respects the proposal would comply with saved policy 1.12 of the Southwark Plan. As set out in the planning policy section of this report, it is proposed to amend the town centre boundary through the

New Southwark Plan, and the entirety of the application site would then sit within the new town centre boundary.

111. With regard to the number of hotel rooms in the borough, an objection has been received raising concerns that the Mayor of London's 2006 Hotel Demand Study required 2,500 rooms in Southwark and that this was already exceeded by 2015, with more consented hotel rooms in the pipeline. The objection advises that there are already 350 hotel rooms in the area, with limited demand, and that the proposed hotel would put other hotels out of business.
112. Given that Southwark has already exceeded the draft London Plan requirement for hotel rooms in terms of permissions granted, none of the proposal sites in the draft NSP include hotel use, with the expectation being that hotel proposals will be considered on a case by case basis assessed against the policies outlined above. The Background Paper concludes that Southwark should remain supportive of new hotels, as long as other plan commitments and the requirements of site allocations and development management policies can be met.
113. In this instance the proposed hotel would not compromise the ability to deliver the other objectives set out in the NSP site designation, including the provision of employment space, routes through the site and new housing. Whilst there would be a reduction in employment space, this is considered to have been justified through marketing evidence. The site allocations methodology report for the NSP gives an indicative amount of residential floorspace on the site of 3, 515sqm (GIA). The proposal would deliver 4,302.6 sqm GIA which would exceed the floorspace expectation.
114. The policies outlined above also require consideration of whether there would be an over dominance of visitor application in the locality, and this issue is considered in a Hotel Market Study which has been submitted with the application. The study considers existing and consented hotels within a one and a half mile radius of the site which extends across a large area from New Kent Road in the north to Herne Hill in the south.
115. The study shows that there are currently 18 hotels in this area providing 865 rooms; 15 of these hotels (490 rooms) are in Southwark and the remainder are in Lambeth. There are two hotels in Camberwell Town Centre, the closest of which is the Church Street Hotel which is a 3 star, 31 room hotel approximately 270m to the north east of the site on Camberwell Church Street; this hotel includes a restaurant and bar which are open to the public. The second is also on Camberwell Church Street, the OYO New Dome Hotel which is a 2 star, 25 room hotel approximately 315m to the north-east of the site and it is understood that it does not provide any public facilities.
116. As for consented hotels, the study advises that there are 8 developments within a 1.5 mile radius of the site which would deliver 482 bedrooms. Of these, five of the developments are within Southwark, providing 266 rooms. The closest to the application site is an existing 213 room hotel at 110 Peckham Road which is approximately 900m away from the site and has consent for 86 additional bedrooms.
117. Given that there are currently only two hotels in Camberwell Town Centre which are

both some distance from the site and there are no consented hotels in the town centre, there is not considered to be an over-concentration of visitor accommodation in the locality. Although Southwark has a large number of existing and consented hotel rooms overall, these are predominantly concentrated in the north-western part of the borough. The Hotel Market Study anticipates that demand for the hotel would arise mainly from displaced demand from central London and from the nearby hospitals in the short term, including people visiting the hospitals for training courses. With the redevelopment of nearby Elephant and Castle and Camberwell's increasingly well recognised status for arts and creativity, it is anticipated that more visitors would be attracted to stay in the area in the longer term. Concerns have been raised during public consultation on the application that there will be less demand for a hotel due to Covid-19, and whilst this is noted and tourism has been impacted this year, it is not known what the effects will be in the longer term. The applicant could not use the hotel as a hostel or House in Multiple Occupation (HMO) without first obtaining planning permission.

118. The proposed hotel would add to the range of uses available in this part of the borough, and would help to support existing businesses in the town centre by generating footfall. It is estimated that hotel guests would contribute some £4.95m per annum to the local economy, and as set out above the proposed hotel would generate employment opportunities. Policy 40 of the draft NSP requires hotel developments to provide a minimum of 10% of the total floorspace as ancillary facilities which incorporate a range of daytime uses and offer employment opportunities. In this case the hotel would be part of a mixed use development which would also provide employment and café / restaurant space, as well as public access to facilities such as meeting and screening room, thus meeting the requirements of this policy.
119. The proposed development would also help to deliver the NSP Camberwell Area Vision which requires development to complement and improve the town centre with more large and small shops, entertainment, leisure, workspaces for smaller enterprises, particularly creative industries, cultural activities and well designed public spaces for visitors to linger. The development would be well connected to the town centre and the landscaped area outside the hotel would provide external seating, both incidental and linked to the café.
120. The submission advises that the hotel would be retained and operated by the applicant, and that the Black British Female Artist Collective (BBFAC) would be involved with the design of the hotel interiors and façade. A number of the public comments on the application are supportive of the applicant operating the hotel rather than a chain, but Members must bear in mind that there would be no requirement in planning terms for the applicant to operate the hotel, and if permission is granted and implemented, the hotel could be run by any operator.
121. Land uses conclusion - The proposed development would result in a loss of B class floorspace on the site, but this is considered to have been adequately justified in this instance through the provision of marketing evidence. When the application was submitted only four of the units on the site were occupied and were mainly used for storage, supporting only 16 jobs. The proposed development would provide good quality workspace and would support approximately 303 jobs which is a very positive aspect of the scheme. The provision of low cost affordable workspace would support the creative industries in Camberwell. There is significant demand for housing in the

borough and the provision of new housing would comply with the site designation in the draft NSP. Whilst the hotel would sit just outside the town centre, it would be well connected to it and has a PTAL. It would not result in an overconcentration of visitor accommodation in the locality, and would support the town centre by generating footfall and spending in the local economy, creating jobs, and providing facilities which would be available to the local community. Whilst a hotel is not listed as one of the acceptable uses under the emerging NSP site allocation, it could have positive benefits for Camberwell both in supporting institutions such as the hospitals and driving footfall to support the viability of the town centre, and these material considerations can be given weight. The principle of the proposed development is therefore considered to be acceptable in land use terms in this location.

### **Environmental impact assessment (EIA)**

122. In February 2019 the Council adopted a negative Screening Opinion confirming that an EIA was not required for the redevelopment of the site for a mixed use building up to 8 storeys in height, comprising co-working space, artist studios, 142 hotel rooms, 45 residential units and a new public route (reference: 19/AP/0239). The proposal now under consideration is for the same land uses but smaller in scale than that for which the Screening Opinion was issued, therefore it is concluded that no EIA is required for this proposal.

### **Design of the proposal and impact upon the character and appearance of the Camberwell Green Conservation Area**

123. 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. Policies 7.4 and 7.5 are also relevant which require developments to provide high quality public realm and architecture. Policy SP12 of the Core Strategy states that "Development will 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 policies 3.12 and 3.13 of the Southwark Plan require developments to be of a high standard of architectural and urban design and saved policy 3.18 seeks to preserve or enhance the settings of heritage assets. Representations have been received both in support of and raising concerns regarding the height and design of the proposed development.
124. The existing buildings on the site date from the mid 20<sup>th</sup> century and are of little historic or architectural interest, and have been remodelled and extended over time. All of the buildings on the site would be demolished and most of unit 1a sits within the Camberwell Green Conservation Area – the impact upon the character and appearance of this part of the conservation area is considered further below. The nearest listed buildings are approximately 350m to the north of the site and there are further listed buildings fronting Camberwell Green.
125. Layout - The site is a tight backland site, roughly triangular in shape and surrounded

by buildings, and the access from Denmark Hill currently only leads to units 1 and 1a. Within this context, the proposed layout of a large, centrally placed workspace and hotel building bounded by linear residential blocks (Block A- adjacent to the main entrance from Denmark Hill and Block B at right angles) would be logical. It would define the routes through the site and would create an attractive landscaped area described as 'The Hub' upon entering the site from Denmark Hill.

126. The new routes would connect Valmar Road with Denmark Hill and Milkwell Yard which would comply with the requirement in the draft NSP site designation. The Denmark Hill route would be approximately 3.2m wide upon entering the site from the town centre, and would open out into the Hub. This route would be enhanced with landscaping and lighting and the hotel entrance canopy would be visible beyond, all of which would help to draw people into the site. At present there are bins and external stairs belonging to the adjoining properties along this route. Whilst the external stairs would have to remain, the applicant has contacted these properties with a view to improving the refuse storage arrangements, including potentially relocating the bins or enclosing them. Milkwell Yard is adopted highway therefore improvements to this area can be secured through the s106 agreement, including resurfacing it and other environmental and security improvements. The s106 agreement would also secure public access through these routes and a condition would secure the removal of the existing gates across the Valmar Road access to keep this route open.
127. Although the routes past Blocks A and B would be a similar width (10.5m and 12.5m respectively at ground floor level), they would feel quite different. The route leading to Denmark Hill would be lined with workspace and the hotel which would create an active, urban feel to this route. This would be in contrast to the softer landscaping elements and a more domestic feel to the secondary route which would lead past Block B to Milkwell Yard. This difference would be further reinforced by the taller building of Block A along the east-west route. In short there would be a hierarchy to the layout which would create spaces of different characters according to their function, and this is considered to be a positive element of the proposal. Moreover the distribution of land uses across the site would be logical, with the predominantly residential elements located closest to existing residential properties, and the workspace and hotel closest to Denmark Hill which contains a mix of commercial and residential uses.

Proposed route between the Main Block and Block A, looking towards Valmar Road

---

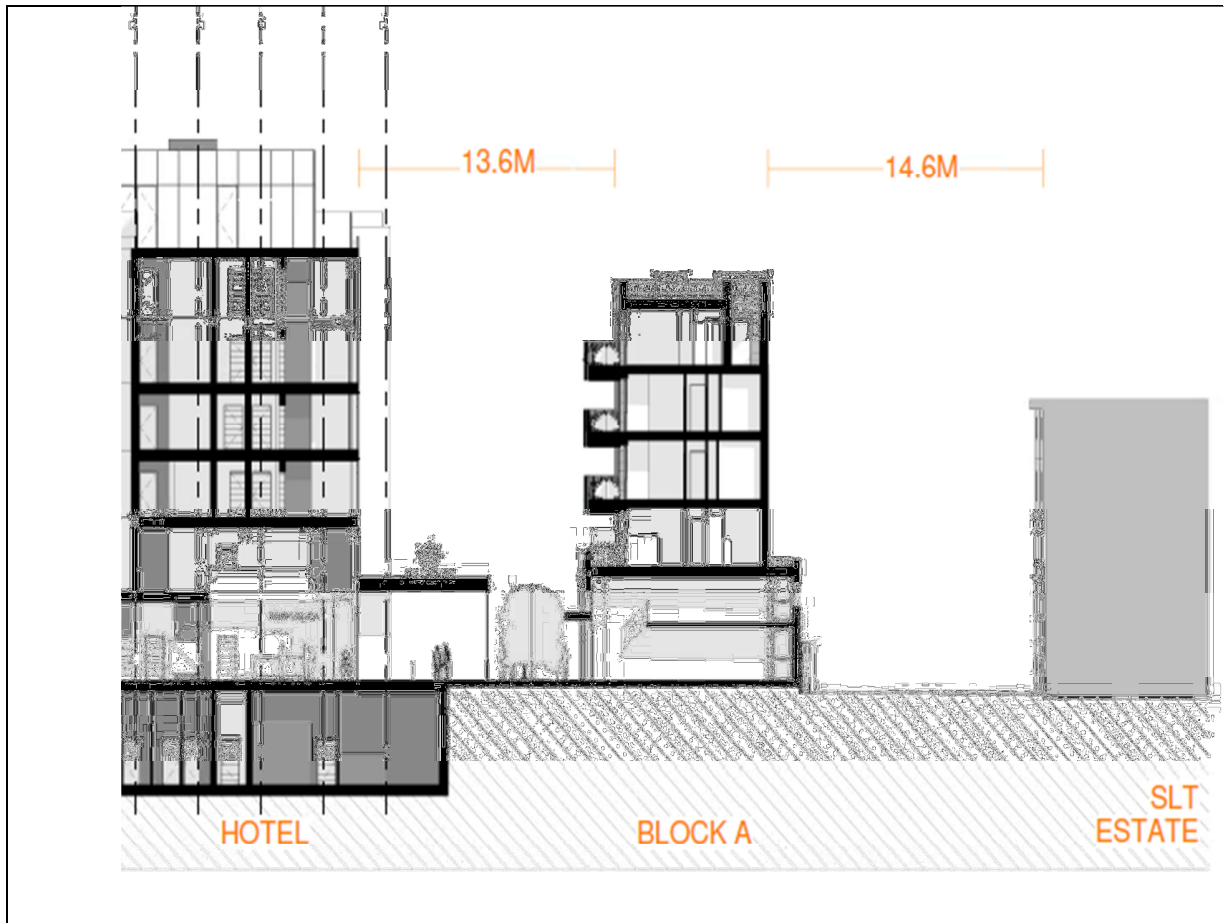


128. Height, scale and massing – Concerns have been raised following public consultation on the application regarding the impact upon the NSP protected linear view of St Paul's Cathedral along Camberwell Road. However, the site does not sit within or near to the proposed viewing corridor, and as such would have no impact upon this view.
129. The application has been amended to reduce the height of the Main Block and to minimise views of it from outside the site, although this building would nonetheless still appear quite tall for the backland space it would occupy. However, the degree of enclosure that this would impart is not without precedent when considering large warehouse typologies, of which there are many examples in the borough. As set out further later in the report this Main block would only be minimally visible from street level along Denmark Hill. The top floor of the building would be set back so as to reduce its apparent height when viewed from within the site, and a 5-storey shoulder line would be created opposite Block B by setting the upper floors back.

---

Proposed section





130. Block A would also be quite tall in terms of defining the edge of the main open space of the scheme. However, the commercial ground and mezzanine floors would project forward of the residential accommodation above to provide a lower scale element which would help to create a more comfortable overall scale for this block. Given the secondary nature of the route which would connect the site with Milkwell Yard and the proximity to the dwellings on Valmar Road, the height of Block B at four storeys is considered to be appropriate and would sit comfortably alongside the 3-storey dwellings along Valmar Road.
131. Architectural design - The Main Block would have an expressed brick frame, with the infill between comprising recessed brick panels and windows. It is considered that this aesthetic would be a successful and slightly gentler derivation of the industrial 'heavy brick' buildings in the wider area. The elevations would be enlivened on the entrance façade by artwork of metal infill panels to selected openings within the frame, with the intention being that the patterns for the metal panels would be designed and made by local artists. It is noted that grey brick is proposed, and the surrounding buildings are more buff and red in tone. A condition for sample panels has been included in the draft recommendation to ensure that the final brick choice would compliment the surrounding townscape.

Proposed view of the Main Block and Block B looking towards Milkwell Yard

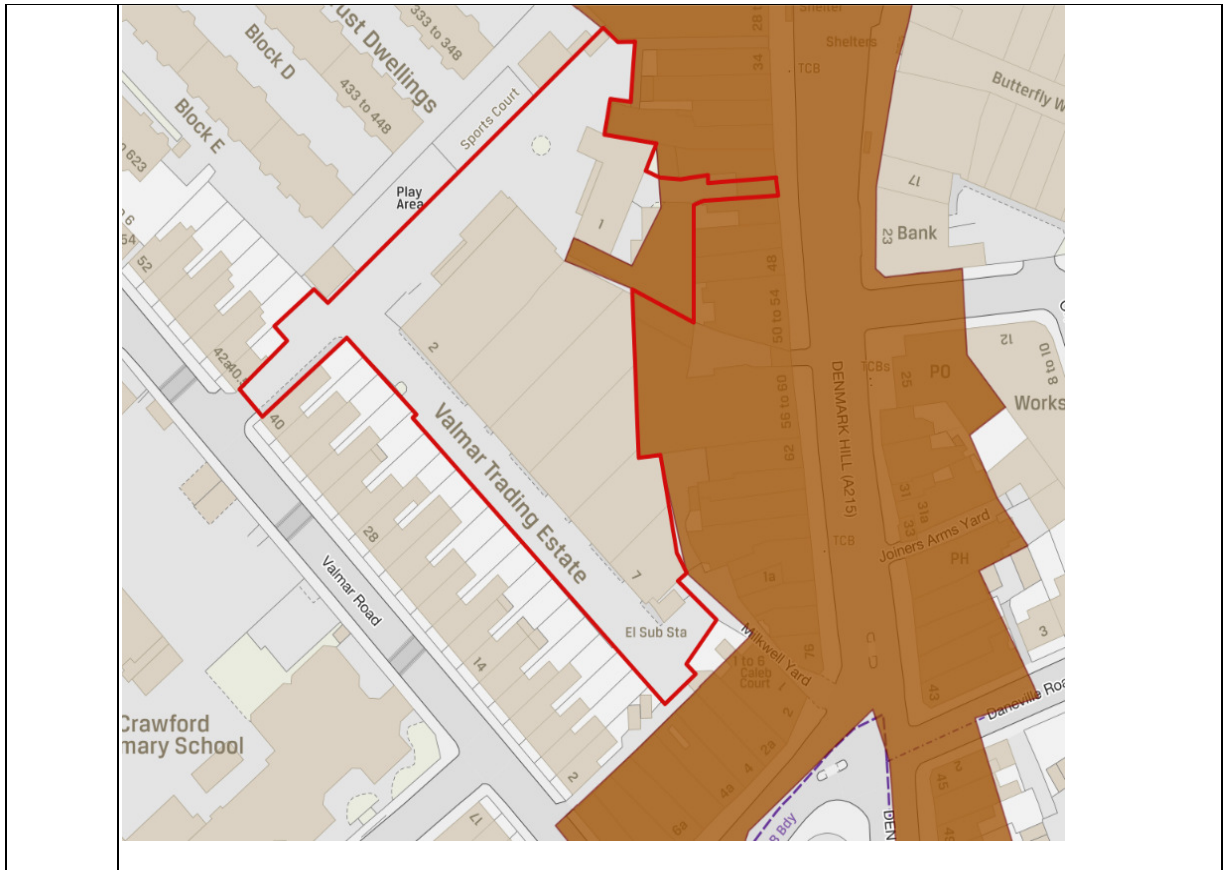


132. Both of the residential blocks would be well proportioned and would tend to be seen obliquely from within the site rather than face on. Furthermore, 'rusticated' brick panels would provide a welcome decorative feature on both blocks.
133. Owing to ground levels Block B would be set on a slight slope, with the tallest end being at Milkwell Yard. The block would step down at regular intervals reflecting this topography and in combination with recesses and projections in the plan and frequent front doors, this would help to give the impression of a series of tall town houses rather than one singular block. Conditions are recommended requiring detailed drawings of the various elements of the buildings including bay studies and sections through facades.

Impact upon the character, appearance and setting of the Camberwell Green Conservation Area

134. The NPPF and supporting National Planning Practice Guidance requires development to conserve or enhance heritage assets and their setting and to avoid causing harm. Designated heritage assets includes conservation areas, and most of Unit 1a sits within the Camberwell Green Conservation Area which was designated in 1981. The conservation area boundary runs diagonally across unit 1a and does not include two small sections of the building furthest into the site as shown on the image below. Unit 1a would be demolished along with all of the other buildings on the site. The NPPF requires the Local Planning Authorities to consider whether heritage harm is 'substantial' or 'less than substantial', and this includes harm to conservation areas and their settings.

Map showing part of the site which sits within Camberwell Green Conservation Area



135. Unit 1a is located on the eastern side of the site behind Denmark Hill, and the route into the site is also within the conservation area. It is a single-storey, 20<sup>th</sup> century warehouse / shed type building with brick walls and a corrugated metal roof which is only visible from the yard space at the end of the Denmark Hill route, from unit 1, and from the upper floors of the neighbouring properties on Denmark Hill. This building is not considered to be of any interest and does not in itself contribute to the special character or appearance of the conservation area. In the view of officers its loss, along with other utilitarian buildings on the site to make way for the scheme proposals, would not result in any harm to the special character or appearance of the conservation area.

Unit 1a on far left hand side of image





Interior of unit 1a



136. With regard to the impact of the proposed buildings, as set out above the development would be quite tall relative to the established context and therefore has the potential to affect the setting of the conservation area. This is particularly the case in views from the north across the wide and open space of the Camberwell Green / Denmark Hill/ Camberwell New Road junction. As first submitted the higher parts of the Main Block would have risen into these views above attractive Victorian commercial buildings lining the western side of Demark Hill. The top of the hotel building would have read as a large and incongruous mass which would undoubtedly have harmed the traditional townscape character of the area.
137. The scheme has subsequently been amended to remove an entire storey from the Main Block and the remaining top floor has been reduced in area and clad in more translucent materials so as to be less prominent. Revised images show that the top part of the building would now only just project above the foreground townscape buildings in one view close to the junction, and the prominence of the proposed building in this view has been reduced such that the harm to townscape and hence the setting of conservation area would be small, and certainly less than substantial. The harm can be therefore weighed against the public benefits that would be brought about by the scheme as allowed for by paragraph 196 of the NPPF. These benefits include job creation, the provision of new housing including affordable housing and new public routes through the site. In all other views from the north and south along Camberwell Road and Denmark Hill, the development would be hidden behind the Victorian buildings that line these streets.

---

Proposed view from near pedestrian crossing on opposite side of Denmark Hill





138. To conclude in relation to design and heritage impacts, following the revisions to the scheme it is considered to be of a high standard of design which would significantly enhance the appearance of the site, and that the character, appearance and setting of this part of the Camberwell Green Conservation Area would be preserved.

#### **Trees and landscaping**

139. Policy 7.5 of the London Plan 'Public realm' advises that London's public spaces should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces.
140. An Arboricultural Impact Assessment has been submitted with the application. The only tree on the site is a Sycamore which is growing near to the entrance from Valmar Road, near the back of one of the Valmar Road houses. Although large, it has been identified as a category C tree (low quality) and its loss would be mitigated through the provision of 18 new trees within the site, and a condition to secure these is recommended.
141. Landscaping - The site would be predominantly hard landscaped using concrete paving which would provide a shared surface for pedestrians, cyclists and vehicles, with contrasting paving used to differentiate where different activities would take place. Soft landscaping in the form of new trees, shrubs and hedging would be used to form

buffers in front of blocks A and B, with pockets of soft landscaping near to the Denmark Hill and Valmar Road entrances and lawns to the rear of Block B. The Hub close to the Denmark Hill entrance would be the focus of the public open space within the development, and would incorporate permanent seating, outdoor seating for the café, planting and space for art installations. Overall the landscaping of the site is considered to be acceptable and would provide welcome greening which would be secured by way of a condition.

### Density

142. The site is within in the Urban Density Zone and has a public transport accessibility level (PTAL) of 6a (excellent). Table 3.2 of the London Plan supports a density of 200-700 habitable rooms per hectare in this location which aligns with strategic policy 5 of the Core Strategy. The draft London Plan removes density ranges altogether, and instead policy D3 requires all development to make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Regard must be had to the form and layout, experience, quality and character of the site and the NSP adopts a similar approach, with density ranges no longer included in the plan. Concerns have been raised by neighbouring residents that the proposal would be too dense for the site.
143. Based on the current adopted policy the density of the proposed development would equate to 716 habitable rooms per hectare. This is based on the Southwark Plan methodology for mixed use developments which requires areas of non-residential space to be divided by 27.5 to create an equivalent number of habitable rooms per hectare.
144. Where developments would exceed the density ranges set out in policy, the Council's Residential Design Standards SPD requires the accommodation to be of an exemplary standard and an assessment against the exemplary criteria in the SPD is set out below.

Exemplary residential design criteria from Southwark Residential Design Standards SPD	Commentary
Provide for bulk storage	All of the units would have bulk storage, and 87% of the units would meet or exceed the SPD minimum requirement in terms of sqm. The remaining 13% (7 units) would be 3-bed private units in Block B with shortfalls in bulk storage ranging from 0.1sqm to 0.3sqm.
Exceed minimum privacy distances	Minimum privacy distances would be exceeded between habitable rooms.
Good sunlight and daylight standards	91% of the units would meet or exceed the BRE guidance for internal daylight levels. This is further explained in this report.

Exceed minimum ceiling heights of 2.3m	All rooms within the proposed dwellings would have 2.5 metre floor-to- ceiling heights.
Exceed amenity space standards (both private and communal)	The proposed amenity space is set out later in the report. Where the recommended 10 sqm private amenity space has not been met, the shortfall has been included as communal amenity space in line with the Residential Design Standards SPD.
Secure by Design certification	This scheme would be cable of achieving Secured by Design Accreditation and a condition to require this is recommended.
No more than 5% studio flats	No studio flats are proposed.
Maximise the potential of the site	The potential of this site would be maximised, delivering improved commercial floor space, new dwellings, new routes through the site and outdoor space and play space without unduly compromising local visual or residential amenity.
Include a minimum 10% of units that are suitable for wheelchair users	11.6% of the proposed units would be suitable for wheelchair users.
Excellent accessibility within buildings	The accessibility within the buildings would be excellent with lift access to all upper floors and wheelchair units located at ground floor level.
Exceptional environmental performance	The development is capable of achieving BREEAM “excellent” for the employment space and hotel. The development would need to make a carbon off set contribution to bring the development to carbon zero in accordance with the draft London Plan and this would be secured through the s106 agreement.
Minimised of noise nuisance between flats through vertical stacking of similar room types	The plans submitted demonstrate that a good level of stacking would be achieved.
Make a positive contribution to local context, character and communities	The proposed development would make a positive contribution to local context, character and community in terms of its quality of design and regeneration benefits including affordable housing, employment space and a hotel which would all help to support the town centre.



Include a predominance of dual aspects units	98% of the total units (42 units) proposed would be dual or triple aspect.
Have natural light and ventilation in all kitchens and bathrooms	All kitchens would benefit from natural light and ventilation. Bathrooms on the other hand would not achieve this as all bathrooms would be internalised but will benefit from mechanical ventilation.
At least 60% of units contain two or more bedrooms.	67.4% of the units would have two or more bedrooms.
Significantly exceed the minimum floor space standards	All units would meet the minimum space standards and 90.69% of the units would exceed the minimum standards.
Minimise corridor lengths by having additional cores	No more than 3 units per core is proposed, complying with the Mayor's Housing Design SPG which advises no more than 8 flats per core. There would be no long corridors within the residential blocks.

145. It is considered that the proposed development would provide a very good standard of accommodation with very high levels of dual aspect, good daylight penetration and excellent accessibility. It is noted that the proposal would only just exceed the density range set out in policy.

### **Affordable housing**

146. Section 5 of the NPPF sets out the government's approach to the delivery of significant new housing including a requirement for housing of different sizes, types and tenures to meet the needs of different groups. Policy 3.11 of the London Plan sets a target of at least 17,000 affordable homes per year in London over the plan period, which is reinforced through Strategic Policy 6 of the Core Strategy. This policy 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 and sets a target of providing a minimum of 8,558 net affordable housing units between 2011 and 2026. Developments with 10 or more units should provide a minimum of 35% affordable housing, subject to viability, and a tenure split of 50% social rented and 50% intermediate housing is required in the Camberwell Action Area.
147. Policy P1 'Social rented and intermediate housing' of the draft NSP requires developments of 10 or more residential units to provide a minimum of 35% affordable housing, comprising a minimum of 25% as social rented and the remainder as intermediate. The tenure split within the draft NSP policy is currently being applied instead of the adopted policy in recognition of the updated needs assessment and the pressing need for social rented housing in the borough.
148. There would be 14 affordable units within the development which would all be located

in Block A; this block would also contain one private unit at first floor level. For developments of 15 or more units affordable housing is calculated in habitable rooms. For affordable housing purposes there would be 181 habitable rooms within the development and of these, 64 would be affordable which would equate to 35%. The tenure split of the proposed development would comply with the draft NSP policy in providing 25% social rented and 10% shared ownership (intermediate).

Mix of affordable housing by habitable room

Unit type	Private market habitable rooms	Social rented habitable rooms	Intermediate habitable rooms	Total habitable rooms
1-bed	14	0	0	14
2-bed	15	0	9	24
3-bed	82	45	10	137
4-bed	6	0	0	6
<b>Total</b>	117 (65%)	45 (25%)	19 (10%)	181 (100%) (64 affordable habitable rooms =35%)

Mix of affordable housing by unit type

Unit type	Social rented	Intermediate	Total
2-bed	0	3	3
3-bed	9	2	11
<b>Total</b>	9	5	14

149. The application is supported by a financial viability appraisal which has been independently reviewed by BPS on behalf of the Council. Following negotiations between BPS and the applicant's viability consultant the agreed position is that the proposed development would result in a deficit of -£1,151,885. This is largely on account of limited information having been provided regarding the hotel fit out specification meaning it has been valued at the lower end of the scale, and because the café / bar has been valued as a separate entity because it would be open to the public. In spite of the deficit, which would amount to a reduction of around 2% in profit, the applicant has agreed to provide a policy compliant amount of affordable housing which would be secured in the legal agreement. As the strategic target for affordable housing in the draft London Plan is 50% and 35% is a minimum, early and late stage viability reviews are required, with the late stage review being at occupation of 75% of the private residential sales or rent. This would also be secured through the legal agreement and would enable any increase in the value of the hotel to be captured once more information about its fit out becomes available, as well as recognising any other improvements to viability due to value increases or build cost savings..

**Mix of dwellings**

150. Strategic Policy 7 'Family homes' of the Core Strategy requires at least 60% of the units to contain two or more bedrooms and at least 20% of the units to contain three or

more bedrooms in the Urban Density Zone.

Proposed unit mix

Unit size	Number of units	Percentage of units %
1-bed	7	16.3
2-bed	7	16.3
3-bed	28	65.1
4-bed	1	2.3
<b>Total</b>	43	100

151. The proposal would deliver 83.7% of units with 2+ bedrooms and 67.4% of the units with 3+ bedrooms which would be policy compliant, and the provision of 3+bed units above the policy requirement is welcomed.

**Wheelchair accessible housing**

152. Policy 3.8 of the London Plan 'Housing choice' requires 90% of new housing to meet Building Regulation requirement M4 (2) 'accessible and adaptable dwellings', and 10% 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.
153. The proposal would include five ground floor wheelchair user dwellings M4(3) comprising 4 x 1-bed and 1 x 2-bed units, all of which would comply with the larger unit sizes set out in the Residential Design Standards SPD for wheelchair user dwellings. This would equate to an 11.6% provision which would exceed the policy requirement, and a condition to secure these units is recommended. All of the remaining units would be constructed to (M4(2)) standards as wheelchair accessible and adaptable dwellings. It is noted that the wheelchair accessible units would all be private units located in Block B, and whilst the greatest need for wheelchair units is in the affordable tenure, the policy does not set a tenure requirement. Before the application was amended wheelchair accessible affordable units were shown in the ground floor of Block A, but these were subsequently omitted due to concerns about their quality, and additional employment floorspace provided instead.

**Quality of accommodation**

154. 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.
155. Suitability of the site for residential use - An Environmental Noise Survey and Acoustic Design Statement Report has been submitted in support of the application which

advises that the main noise sources affecting the site are air and road traffic and noise from Crawford Primary School.

156. The document has been reviewed by the Council's Environmental Protection Team (EPT) which has recommended a number of conditions to protect the amenity of existing neighbouring occupiers and future occupiers of the site. This includes conditions to limit plant noise and to ensure that noise levels within the proposed flats would be acceptable, and these conditions have been included in the draft recommendation.
157. Privacy - The Council's Residential Design Standards SPD recommends a minimum of 21m between the rear elevation of properties, and 12m distance between properties which face one another, including across a highway.
158. There would be a 12m separation distance between blocks A and B and the proposed hotel and as the routes within the site would essentially become new streets, this would comply with the guidance in the SPD for properties facing each other. It is noted that bedrooms at ground floor level within Block B would face towards the street, but low brick walls and hedges would be used to create defensible space in front of them.
159. Aspect - All but one of the residential units in the development would be dual or triple aspect (98%) which is welcomed. The only single aspect unit would be at top floor level within block A, and it would be a south-facing unit.

Unit sizes

<b>Units</b>	<b>SPD minimum sqm</b>	<b>Overall unit size (minimum) sqm</b>	<b>SPD amenity space minimum sqm</b>	<b>Amenity space minimum sqm (minimum)</b>
<b>1-bed</b>	50	52	10	6.2
<b>2-bed</b>	61-70	61.9	10	10
<b>3-bed</b>	74-95	75	10	10
<b>4-bed</b>	117	151	10	59.3

160. 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 would fall short of the standards set out in the Residential Design Standards SPD, with shortfalls ranging from 0.8sqm to 2.5sqm. However, as the overall unit sizes would comply with the required standards this is considered to be acceptable and the overall quality of accommodation is not unduly compromised.
161. Internal light levels - A daylight assessment based on the Building Research Establishment (BRE) Guidance has been submitted which provides an assessment of daylight 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.
162. All of the habitable rooms for the residential units have been tested and 91% of them

would comply with the BRE guidance in relation to ADF. There would be 14 rooms which would not comply with the guidance and 10 of these would be bedrooms, one of which would have an ADF of 0.1% owing to the window being partially obscured by a balcony, and the others would have ADFs ranging from 0.5% to 0.9%. The four other rooms would be open plan living spaces which would have ADFs ranging from 1.5% to 1.9% against a target of 2%. Whilst the daylight levels to these rooms are noted, overall there would be a very high level of compliance across the development.

163.

Amenity space and playspace - 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. The standards for flats are set out in the table below together with details of the proposed provision within the development. Playspace requirements are calculated in accordance with the GLA's Play and informal recreation SPG.

Type of space	Policy requirement (sqm)	Proposed (sqm)	Difference (sqm)
<b>Child play space</b>	283 comprising: 0-4 years – 110 5-11 years – 92 12-15 years 53 16-17 years – 28	283 comprising: 0-4 years – 110 5-11 years – 92 12-15 years 53 16-17 years – 28	0 – policy compl
<b>Private amenity space</b>	10 per unit - any shortfall in 1 and 2 bed units to be added to the communal provision	<u>Block A</u>  Between 10.1 and 29sqm per unit  <u>Block B</u>  Between 6.2 and 59.3sqm per unit  (all 3- beds within the development achieving at least 10sqm)	0 – policy compl  0 – policy comp 11.4sqm shortfa private am space made up through comm provision.
<b>Communal amenity space</b>	50 per development + any shortfall of private amenity space (50sqm communal provision generally applied per block rather than per development).	Block A	-23sqm shortfa

	<u>Block A</u>	27sqm next to block B plus access to communal space at the rear of block A	communal amenity space for Block A
	50sqm		
	<u>Block B</u>	<u>Block B</u>	+3sqm. Policy complaint
	61.4sqm	64.4sqm	
	(50 sqm + 11.4 sqm shortfall of private amenity space)		

164. All of the development's playspace requirements would be met on site, and a condition is recommended requiring details of the equipment to be installed and means of enclosure to the playspaces to be submitted for approval.
165. There would be a shortfall in communal amenity space for Block A; although the Residential Design Standards SPD requires 50sqm of communal amenity space to be provided per development which the scheme would deliver, the 50sqm requirement is generally applied per block. Block A residents would have access to the communal space at the rear of Block B which should be secured by way of condition, although it is recognised that they may be less likely to use it given its location. There would also be 27sqm of communal amenity space next to the play area at the end of Block B. Officers recognise that this issue is a shortcoming of the scheme, and have explored two options to increase the communal provision, including providing space on the roof of Block A, and providing space towards Milkwell Yard by relocating the three parking spaces. Neither of these options has been possible owing to overlooking concerns, the need for an additional core and a consequent reduction in affordable habitable rooms if it were provided on the roof of Block A, and the impact upon vehicle turning space if it were provided towards Milkwell Yard. The shortfall in communal amenity space must therefore be weighed in the balance when considering all other aspects of the proposal. Officers are of the view that this would not outweigh the positive impacts of the proposal and that a very good standard of accommodation would be provided nonetheless, with all of the Block A units having at least 10.1sqm of private amenity space.
166. The four bedroom unit in Block B would essentially be a townhouse and the Residential Design Standards SPD requires houses to have gardens of at least 50sqm and at least 10m in length extending across the full width of the dwelling. In this instance the house would have a full width garden measuring 29.8sqm and 5m long. Whilst this would not comply with the guidance, it is considered that this unit would provide a very good standard of accommodation nonetheless. In addition to the garden, one of the bedrooms would have a 20.2sqm terrace at first floor level, bringing the total private amenity space for this unit to 50sqm.
167. Overshadowing to the communal amenity space, playspace, new routes and the rear gardens to Block B has been assessed against the BRE guidance. The 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.

The route leading to Milkwell Yard, the hotel roof terrace, the play space / communal amenity area at the side of Block B and four of the twelve gardens at the rear of Block B would all comply with the BRE guidance. Only 24.2%% of the route leading to Denmark Hill including 'The Hub' would receive at least 2 hours of sunlight on 21<sup>st</sup> March and the areas of the remaining eight gardens at the rear of Block B which would receive at least 2 hours of sunlight would range from 30.3% to 48.4%. The same test has been undertaken on 21<sup>st</sup> June and 89.9% of the route to Denmark Hill would receive at least 2 hours of direct sunlight together with all of the individual gardens to Block B, with the areas ranging from 71.8% to 92%; it is noted that the gardens and the landscaped space around the buildings are likely to be used more frequently during the summer months.

168. The proposed hotel – There are no minimum room sizes for hotel rooms, which in this instance would range from 14sqm to 37sqm and each room would be served by at least one window. Policy 4.5 of the London Plan requires at least 10% of hotel rooms to be wheelchair accessible which the proposal would comply with by providing 13 wheelchair accessible rooms (10.2%) and a condition to secure this is recommended.
169. Secured by Design - The application has been reviewed by the Metropolitan Police and the advice received is that the development is capable of achieving Secure by Design certification which should be secured by condition. The relevant condition has been included in the draft recommendation.
170. To conclude in relation to quality of accommodation, it is considered that the proposal would deliver a very good standard of residential accommodation. Although there would be a shortfall of communal amenity space for Block A, each of the Block A units would have at least 10.1sqm of private amenity space and would be located close to the landscaped area of The Hub. All of the children's playspace requirements would be met on the site, and there would be an exceptionally high level of dual aspect units (98%) and a very high level of compliance with the BRE guidance for internal daylight levels (91%). All of the units would meet or exceed the nationally described space standards and the hotel would provide a policy compliant amount of wheelchair accessible rooms.

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

171. 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.
172. Concerns have been raised by neighbouring residents including construction impacts, daylight / sunlight impacts, loss of privacy, and noise and disturbance. The existing buildings on the site range between 8m and 11m in height, the tallest being units 1 and

2. Unit 1a is single storey, and units 3-7 are low rise units which are set approximately 11m off the boundary with the Valmar Road terrace.
173. Impact of the proposed uses - The proposal is for employment space (Class B1), a hotel, café and residential uses. Concerns have been raised regarding the potential for noise, disturbance and anti-social behaviour resulting from the proposed hotel use, including noise from plant, servicing vehicles and people.
174. Class B1 uses generally sit comfortably near to residential properties and should not result in any loss of amenity. Noise from people would be more difficult to control, although the proposed layout of the uses on the site locating residential units closest to existing residential and locating the hotel closest to Denmark Hill and the town centre would assist in this regard. It is considered likely that most people working at the site and hotel guests would enter and leave the hotel via Denmark Hill, particularly those using public transport which is predicted to be the main way in which people would travel to and from the site. The s106 agreement would require workspace and hotel management plans to be submitted for approval which would include management of the external spaces, and Secured by Design certification would require measures such as CCTV and good levels of lighting to be installed throughout the site. Conditions have also been included in the draft recommendation to limit plant noise and to restrict servicing hours and this is considered further in the transport section of this report.
175. The potential extent of the café / restaurant space does raise some concerns however, because even though it is only shown as 54.8sqm on the plans the intention is that outside of working hours the open plan co-working and breakout space could be used by hotel guests and members of the public. In effect this additional area, which is approximately 450sqm and could accommodate 300 covers, would become an extended seating area for the café / restaurant. Whilst this would make an efficient use of the space and would avoid it being left empty during the evenings and at weekends, it would need to be carefully managed to avoid any adverse amenity impacts. To this end and on the advice of EPT it is recommended that the opening hours be restricted to 7am to 11pm daily, that any external seating be required to close by 9.30pm daily, and that ventilation details be submitted for approval. Users would generally arrive and leave via Denmark Hill, which is the busy heart of the town centre, and this use could further support the vitality of this town centre. As such, the potential flexibility to extend the café into this area outside working hours is unlikely, subject to hours restrictions, to significantly harm residential amenity.
176. Impact of the proposed buildings - 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. Concerns have been raised that the proximity of the Main Block to the rear of properties on Denmark Hill would hinder the redevelopment potential of these neighbouring buildings.
177. Concerns have been raised regarding construction impacts during the Covid-19 pandemic when more people are likely to be working from home. This is noted, although the potential impacts can be reduced through the use of construction management plans, a condition for which has been included in the draft recommendation.



178. At ground floor level the Main Block would extend right up to the boundaries with the properties on Denmark Hill, except for a small set back next to numbers 52-54. At first floor level and above most of the building would be set back a minimum of 2m from the boundary which should ensure that these neighbouring properties could be developed in the future, particularly if any future developments were similarly set back. The exception to this is at the rear of numbers 44-52 Denmark Hill where the upper floors of the building would adjoin the site boundary without any set back. Owing to concerns regarding daylight, sunlight and outlook which are considered further below, one storey has been removed from the Main Block closest to the boundaries with these properties, and the elevation in question would not contain any windows (a condition to prevent any from being inserted has been included in the draft recommendation). Whilst the space at the rear of these neighbouring properties is fairly limited, it is considered that they could still be extended in the future, and would not be unduly compromised by the proposed development.
179. Privacy and overlooking – As stated, the Council's Residential Design Standards SPD recommends a minimum of 21m between the rear elevations of properties and 12m between properties which face one another, including across a highway.
180. Main Block – The upper floor hotel windows closest to Denmark Hill would have views over the end portions of the closest Denmark Hill properties, although there do not appear to be any habitable windows which would be affected. However, given the close relationship (a minimum of 5m across the Denmark Hill route) it is recommended that a condition be imposed requiring screening to these windows to direct views into the site and away from the neighbouring properties. As set out above, no windows are proposed in the side of the hotel which would face 44-52 Denmark Hill and this should be ensured by way of a condition.
181. An objection was submitted from an architect working on redevelopment proposals at 56-60 Denmark Hill which are detailed in the planning history of adjoining sites section of this report. Following discussions between the applicant and the objector this has subsequently been withdrawn on the basis that privacy screens are installed to the hotel windows facing this boundary, and this should also be secured by way of a condition which has been included in the draft recommendation; the condition also requires details of screening of the top floor roof terrace. Given the irregular nature of the site boundary and the rear of the adjoining properties the condition has been worded to require details once the building is substantially complete, so that officers can visit the building to establish exactly which windows and which parts of the roof terrace need to be screened.
182. The roof terrace at top floor level would measure 356sqm and would be used for events; depending on the nature of the event it could accommodate approximately 51 people. The Council's Environmental Protection Team has advised that the roof terrace should be required to close at 10pm daily and a condition to sure this has been included in the draft recommendation.
183. Block A – The windows and balconies in the side (north-east) elevation of this block would face towards a Co-operative shop at 28-32 Denmark Hill and the rear of a Santander bank at 34 Denmark Hill, and as such would not result in any loss of amenity. The windows in the rear of this block would face the flank elevations of the

blocks within the Samuel Lewis Trust Dwellings. There would be a minimum separation distance of 14.7m, with the windows facing each other across a road and sports area within the estate. The windows in these neighbouring blocks appear to be either secondary or non-habitable, with their main windows at the front and back. As such it is not considered that they would experience any significant loss of privacy as a result of the proposal.

184. Block B - The rear of this block would face the rear of the Valmar Road terrace, and many of these properties have been extended by way of ground floor rear extensions and dormer windows. At ground floor level and taking the various extensions into account, there would be a minimum separation distance of 11.5m and any views would be screened by the existing boundary wall. At first floor level and above the window-to-window separation distances would be 21-22m which would comply with the Residential Design Standards SPD. Of note is that the four bedroom town house would have a first floor rear terrace, the edge of which would be 17.2m from windows in the rear of 40 Valmar Road and a condition for screening to the terrace has been included in the draft recommendation.

Daylight and sunlight - A daylight and sunlight report has been submitted with the application based on the BRE guidance. The following tests have been undertaken:

185. 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. a 20% reduction) following the construction of a development, then the reduction will not be noticeable.
186. 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.
187. 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.
188. The impacts upon the following neighbouring properties have been tested:
- 2-44 Valmar Road (evens)
  - Samuel Lewis Trust Blocks A-E
  - 38-46 Denmark Hill (evens)
  - 62 Denmark Hill
  - 66-78 Denmark Hill
  - 1a Milkwell Yard
  - Caleb Court
  - 2-8 (evens) Coldharbour Lane

189. Of the properties tested, the impacts upon the following properties would comply with the BRE guidance in relation to VSC, NSL and where relevant, APSH:

2, 4, 6, 8, 22, 30, 40, 40 ½, and 44 Valmar Road;  
 38, 40, 62, 66-70, 72, 74, 76 and 78 Denmark Hill;  
 1a Milkwell Yard  
 Caleb Court  
 2-8 Coldharbour Lane

Vertical sky component (VSC)

Address	Windows Assessed	Pass	Fail
Valmar Road	233	222	11
Samuel Lewis Trust	430	387	43
Denmark Hill	46	36	10
Milkwell Yard	6	6	0
Caleb Court	11	11	0
Coldharbour Lane	41	41	0
<b>Total</b>	<b>767</b>	<b>703 (92%)</b>	<b>64 (8%)</b>

Daylight Distribution (No sky line test - NSL)

Address	Rooms Assessed	Pass	Fail
Valmar Road	187	180	7
Samuel Lewis Trust	230	221	9
Denmark Hill	43	36	7
Milkwell Yard	3	3	0
Caleb Court	8	8	0
Coldharbour Lane	31	31	0
<b>Total</b>	<b>502</b>	<b>479 (95%)</b>	<b>23 (5%)</b>

Sunlight (annual probable sunlight hours test – APSH)

Address	Rooms Assessed	Pass Both Tests	Fail Total	Fail Winter
---------	----------------	-----------------	------------	-------------

			APSH	APSH
Valmar Road	32	30	1	2
Samuel Lewis Trust	170	142	20	28
Denmark Hill	38	35	1	3
Milkwell Yard	3	3	0	0
<b>Total</b>	<b>243</b>	<b>210 (86%)</b>	<b>22 (9%)</b>	<b>33 (14%)</b>

190. An assessment of the impacts which would not comply with the BRE guidance is set out below.
191. 10 Valmar Road – One room in this property would marginally breach the BRE recommendation for NSL with a reduction of 21.2%. However, all of the windows to this property would pass in relation to VSC therefore the impact can be considered acceptable.
192. 12 Valmar Road - One window within this property would experience a VSC reduction of 22.49% (with a retained VSC of 23.13%) which would be marginally beyond the BRE recommendation. However, the room is served by another window which would comply with the guidance. The impacts would comply in relation to NSL and APSH.
193. 14 Valmar Road - A conservatory window in this property would experience a 22.91% reduction in VSC (with a retained VSC of 21.67%) which would marginally exceed the BRE recommendation, but the two other windows serving the conservatory would comply with the guidance and the impacts would comply in relation to NSL.
194. 16 Valmar Road – Three windows serving the same room would experience VSC reductions of 22.1%, 21.5% and 21.6% (retained VSCs ranging from 21.469% to 23.91%). This would not significantly exceed the BRE recommendation and two other windows serving the same room would comply. The impacts would comply in relation to NSL and APSH.
195. 18 Valmar Road – Two windows in this property serving the same room would experience VSC reductions marginally beyond the BRE guidance of 24.08% and 23.75% (retained VSCs of 22.19% and 23.02%), and the room would experience a 39% reduction in NSL. These windows serve a rear extension and would directly face proposed Block B, but given that the VSC impact would not be significant this is considered to be acceptable.
196. 20 Valmar Road – A kitchen would experience a 34% reduction in NSL, although it would pass in relation to VSC and as such would not experience a significant loss of light. The kitchen would comply with the BRE guidance in relation to sunlight.
197. 24 Valmar Road - One livingroom window would experience a 23.8% VSC reduction (retained VSC of 20.91%) but another window serving the room would comply with the BRE guidance in this respect, and all of the impacts would comply in relation to NSL and APSH.
198. 26 Valmar Road – Two windows both serving the same room would experience VSC

reductions of 21.87% and 22.20% (retained VSCs of 20.4% and 20.61%) which would marginally exceed the BRE guidance, and the room would experience a NSL reduction of 44.4%. Both windows are within a ground floor rear extension and directly face the site but given that the VSC reduction would only marginally exceed the BRE guidance, the impact would not be significant.

199. 28 Valmar Road - One window to this property would experience a 20.45% VSC reduction (retained VSC of 21.79%) but four other windows serving the same room would comply with the BRE guidance, and all of the impacts would comply in relation to NSL and APSH.
200. 32 Valmar Road – The impact on this property would comply in relation to VSC and NSL. The results show that one room would experience a 25% reduction in winter sun which would marginally exceed guidance. However, this would be just a 1% actual reduction in winter sun, from 4% to 3% and the room is understood to be in use as a WC which is not deemed to have a requirement for sunlight.
201. 34 Valmar Road – one room would experience a NSL reduction of 34.6% but all of the windows would comply in relation to VSC.
202. 36 Valmar Road – Whilst one room to this property would experience a NSL reduction of 40.6%, all of the impacts would comply in relation to VSC and APSH.
203. 38 Valmar Road – one room would experience a NSL reduction of 45.5% but would comply in relation to VSC.
204. 42 Valmar Road – the impacts would comply in relation to VSC and NSL. One window would experience an APSH reduction of 21.4% which would be just beyond the BRE recommendation of 20% (retaining 22% APSH). The window would experience a 50% reduction in winter sun, although the actual reduction would only be from 2% to 1%.
205. Samuel Lewis Trust Dwellings Blocks A-E
- 90% of the habitable windows tested within these blocks would comply with the guidance in relation to VSC, 96% would comply in relation to NSL, and 84% would comply in relation to APSH. These properties have projecting bay windows and a high number of rooms which are served by more than one window. Some windows in the flank elevations facing the site are obscure glazed and therefore may serve non-habitable space.
206. Block A – Although two rooms in this block would experience NSL reductions of 30.1% and 21.7% which would exceed the BRE recommendation, all of the windows would comply in relation to VSC therefore they would not experience a significant reduction in daylight; all of the impacts would comply in relation to APSH.
207. Block B - 12 windows in this block would experience VSC reductions ranging from 20.58% to 41.08%, with retained VSCs ranging from 11.56% to 26.04%.
208. There are three rooms each served by a single window which would experience VSC reductions of 20.58%, 25.63% and 25.90% which would not significantly transgress the BRE guidance. These three rooms would pass in relation to NSL and as such

would not experience a significant reduction in daylight.

209. There are three rooms which are all served by two windows. In two of the rooms one window would not comply in relation to VSC with reductions of 22.56% and 27.06% (retained VSCs of 23.37% and 26.04%) but the two other windows would comply in relation to VSC and the rooms would comply in relation to NSL. In the third room neither window would comply in relation to VSC with reductions of 20.9% and 33.79% (retained VSCs of 19.57% and 21.69%), but the room would comply in relation to NSL and as such would not experience a significant loss of daylight.
210. There are four rooms which are each served by three windows. In two of the rooms one window would not comply in relation to VSC with reductions of 24.04% and 27.11%, but the two other windows would comply and the rooms would comply in relation to NSL. In one room one window would experience a VSC reduction of 34.30% and a NSL reduction of 26.1%, but as the two other windows serving this room would comply in relation to VSC it is unlikely to experience a significant loss of daylight. In the final room two of the windows would not comply in relation to VSC with reductions of 21.45% and 41.08% and the room would not comply in relation to NSL with a reduction of 37.8%. This ground floor room is likely to experience a significant reduction in daylight and this should be taken into account when weighing up all aspects of the proposal.
211. With regard to sunlight, seven rooms within the block would not comply with the BRE guidance. The biggest losses would occur during winter with reductions ranging from 60% to 84.2%, with the rooms receiving between 2% and 4% of the annual winter sun against a recommendation of 5% within the BRE guidance. Annual sunlight losses would range from 18.8% to 45.5% although the rooms would retain relatively high levels of annual sun ranging from 19% to 28% of the APSH against a BRE recommendation of 25%. As such, it is not considered that these impacts would be so significant that they would warrant a refusal of planning permission.
212. Block C – 13 windows in this block would experience VSC reductions ranging from 20.76% to 57.34% (retained VSCs ranging from 11.62% to 25.29%) as set out below.
213. There are five rooms which are served by two windows where at least one window would not comply in relation to VSC. In four of the rooms one window would not comply in relation to VSC with reductions ranging from 34.07% and 54.81%. These are secondary windows each located in the flank wall of the block but the other window serving the room would comply in relation to VSC and the rooms would comply in relation to NSL. As such it is not considered that a significant loss of daylight would occur. In the other room neither window would comply in relation to VSC with reductions of 21.98% and 57.34% (with the larger reduction occurring to a secondary window located within the flank wall) and it would experience a NSL reduction of 32.8%. This would have an adverse impact upon the room, although it is noted that the impact upon the window which is not located in the flank wall would only just exceed the BRE recommendation for VSC.
214. There are seven rooms which are served by three windows and in each of the rooms one of the windows would experience a VSC reduction ranging from 20.76% to 41.69%, but the other two windows serving the rooms would comply in relation to VSC and the rooms would comply in relation to NSL. As such it is not considered that there

would be a significant loss of daylight to these rooms.

215. With regard to sunlight, 11 rooms within the block would not comply with the BRE guidance for winter and total APSH. Six of the rooms would comply with the guidance in relation to annual sunlight and the remaining five would experience sunlight losses ranging from 21% to 40% and would retain levels ranging from 15% to 23% against a BRE recommendation of 25%. The biggest losses would occur during winter with reductions ranging from 55.6% to 100%, with three rooms losing all of their winter sunlight (from existing levels of 2% to 4%). The other rooms would retain between 2% and 4% of the annual winter sun against a recommendation of 5% within the BRE guidance. These impacts must be weighed in the balance when considering all aspects of the proposal.
216. Block D – 12 windows in this block would experience VSC reductions ranging from 21.48% to 54.21% (retained VSCs ranging from 12.21% to 26.51%).
217. There are five rooms each served by two windows where at least one window would not comply in relation to VSC. In four of the rooms one window would not comply in relation to VSC with reductions ranging from 30.62% to 46.03%. These are secondary windows each located in the flank wall but the other window serving the room would comply in relation to VSC and the room would comply in relation to NSL. In the fifth room neither window would comply in relation to VSC, with reductions of 23.8% which would only just exceed the BRE guidance, and 54.21% (with the larger reduction occurring to a secondary window located in the flank wall). The room would experience a 32% reduction in NSL and as such there would be noticeable impact upon this room. This must be weighed in the balance when considering all impacts of the proposal.
218. There are five rooms which are served by three windows and in four of the rooms one window would not comply in relation to VSC with reductions ranging from 21.73% to 37.15%, but the other two windows serving the rooms would comply in relation to VSC and the rooms would comply in relation to NSL. In the other room two windows would not comply in relation to VSC, with reductions of 21.48% and 43.19%. However, given that one window would only marginally transgress the VSC guidance and the room would pass in relation to NSL, it is not considered that the impact would be significant.
219. In relation to sunlight, 4 rooms within the block would not comply with the BRE guidance. The biggest losses would occur during winter with all of the rooms losing all of their winter sunlight (from existing levels of 3% to 5% APSH). These rooms would experience losses in annual sunlight ranging from 24.1% which would not significantly exceed the BRE guidance to 75%, with retained APSH ranging from 7% to 22% against a BRE recommendation of 25%. These impacts would be significant and must be taken into account when considering the positive and negative impacts of the proposal.
220. Block E – Six windows in this block would experience VSC reductions beyond the BRE guidance, ranging from 21.44% to 31.21%. The retained VSCs would range from 11.98% to 20.54%.
221. There are two rooms each served by a single window which would experience VSC reductions of 24.44% and 24.70% which would only marginally transgress the BRE

guidance. Both rooms would comply in relation to NSL and it is considered that the impacts to these rooms would not be significant.

222. There are four rooms each served by three windows where one window would not comply in relation to VSC. Two of these rooms would experience reductions of 21.44% and 21.78% which would not be significant; the two other windows serving the rooms would comply in relation to VSC and the rooms would comply in relation to NSL and as such it is not considered that the impact would be significant. In the two other rooms they would each have one window which would not comply in relation to VSC with reductions of 31.21% and 26.69%, although the two other windows serving the rooms would comply. The rooms would not comply in relation to NSL with reductions of 35.3% and 22.6%. However, given the presence of two windows in these rooms which would comply in relation to VSC it is not considered that the impact would be significant.
223. In relation to sunlight, 6 rooms within the block would not comply with the BRE guidance with losses of winter sun ranging from 33.3% to 75% and retained winter sun ranging from 1% to 2% against a recommendation of 5%. Reductions in annual sun would range from 22.2% to 50%, with retained annual sun ranging from 13% to 21% against a recommendation of 25% and these impacts must be taken into account when considering all aspects of the proposal.

#### Denmark Hill

224. 42 Denmark Hill – Five of the nine windows tested would fail in relation to VSC with reductions ranging from 24.74% to 30.93% which would not be significant, and they would have retained VSCs ranging from 12.81% to 24.19%. For the rooms these windows serve, three would pass in relation to NSL and the other two would experience NSL reductions of 24.51% and 40%. A further two rooms would not comply in relation to NSL, but the windows that these rooms serve would retain VSC levels which would exceed the BRE recommendation of 27%.
225. With regard to APSH, two rooms would not comply with the guidance for winter sun but would comply for annual sun (retaining 25% and 28% of APSH). Both rooms would retain 4% during winter and the impact upon this room is considered to be acceptable as it would not be significantly beyond the BRE recommendations for retained sunlight.
226. 44 Denmark Hill – Two rooms have been tested in this property, each served by a single window. The first would experience a 32.97% reduction in VSC (retained VSC of 17.14%) and a 37.4% reduction in NSL. This room currently receives 1% of winter sun which it would lose, and it would lose 76.5% of its annual sun, reducing from 17% to 4%. This would be a significant impact which must be taken into account when weighing up all aspects of the proposal. However, it should be noted that this room's access to sunlight is restricted, even in the existing condition, by the neighbouring building at 46 Denmark Hill and it does not appear to be a main habitable space. The second would experience a 26.80% reduction in VSC, although its retained VSC would be 26.27% which is only just short of the 27% recommended in the BRE guidance. The room would experience a 28.7% reduction in NSL but given the high retained VSC it is not considered that the impact upon this room would be significant; the room would comply in relation to APSH.



227. 46 Denmark Hill – One room served by a single window would experience a 30.11% reduction in VSC and a NSL reduction of 50.9%. Whilst the NSL reduction would be significant, the retained VSC would be relatively high at 23.03% against a target of 27%. In a second room tested which is served by four windows, two would comply in relation to VSC and two would experience significant reductions of 57.63% and 58.24% (retained VSCs of 13.61% and 13.35%); the impact upon the room would comply in relation to NSL. A third room would comply in relation to VSC and NSL, and the rooms would comply in relation to APSH.
228. Outlook - The separation distances between the proposed buildings and the neighbouring dwellings on Valmar Road and the Samuel Lewis Trust Dwellings would be sufficient to maintain good levels of outlook. There would be a minimum of 14.7m between the Samuel Lewis Trust dwellings and Block A, and 11.5m at ground floor and 21m at first floor level between the Valmar Road properties and Block B. There would be a much closer relationship between the Main Block and numbers 44 and 46 Denmark Hill which both contain residential units. There would be a 9.9m separation distance at 44 Denmark Hill whilst at number 46 there would be just 6.1m at first floor level and 10m at second floor level. The proposal has been amended to reduce the height of the Main Block next to these neighbouring buildings which has improved the daylight / sunlight results and outlook. Where the closest relationship would occur at number 46 this would affect two first floor windows which face the site at a distance of 6.1m. One of the windows is already obstructed by an external fire escape stair which the window looks out upon, and the other window is unobstructed but appears to be served by at least one other window facing south, away from the site. Whilst there would undoubtedly be a loss of outlook to these units, on balance it is considered that the benefits arising from the proposal would outweigh these very localised amenity impacts. Separation distances with the other adjoining properties which contain residential units would range from 17m to 53m which would be sufficient to maintain good levels of outlook.
229. Overshadowing of amenity space - 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 as a result of new development a garden or amenity area does not achieve this and the area which can receive two hours of sun on the ground is reduced by more than 20%, then the loss of sunlight is likely to be noticeable. The gardens to the houses along the Valmar Road terrace have been tested, together with a play / sports area within the Samuel Lewis Trust Estate.
230. For the gardens to the Valmar Road terrace, all of the impacts would comply with the BRE guidance. The impact upon the play / sports area within the Samuel Lewis Trust Dwellings would also comply with the guidance.
231. External lighting – A lighting concept report has been submitted with the application which advises that coloured lighting could be used to illuminate the pedestrian route into the site from Denmark Hill. Lighting could be provided within trees, attached to external furniture and within the landscaping. The hotel would be illuminated by the metal panels incorporated into the building, and lighting is proposed around Milkwell Yard.
232. The lighting strategy has been reviewed by EPT and a condition for full details is

recommended once this element of the proposals has been worked up. This would ensure that there would be no unacceptable light spillage to neighbouring properties and that any lighting columns would not have an overbearing impact upon the neighbouring properties.

233. To conclude in relation to amenity impacts, whilst there would be some significant daylight, sunlight and outlook impacts, these would be limited to a small number of properties and overall the daylight and sunlight impacts would not result in an undue loss of amenity. Good levels of privacy would be maintained and conditions and planning obligations are recommended to deal with impacts such as plant noise and noise arising from the use of the hotel and workspace.

### **Transport**

234. 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 Soutwark Plan seeks to ensure that development is located near transport nodes, and saved policy 5.2 of the Soutwark 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.
235. The site has a Public Transport Accessibility Level (PTAL) of 6a (excellent). The nearest bus stops are located immediately outside the site on Denmark Hill, and Denmark Hill Station is around a 10 minute walk away (750m to the south-east). As stated the only vehicular access into the site is from Valmar Road which is within a controlled parking zone (CPZ) which operates Monday to Friday (0830-1830). There is on-street parking on both sides of the road which means that the road is only wide enough for one vehicle to pass, and there are traffic calming measures along this road and double yellow lines around the Valmar Road entrance to the site. A Transport Statement (TS) has been submitted with the application which includes a Delivery and Servicing Plan and which has been updated to reflect the amendments to the proposal.
236. Access - Vehicular access to the site would be from Valmar Road as existing, controlled by retractable bollards. Concerns have been raised that this access is inadequate to serve the needs of the development, including emergency vehicles. The Council's Highways Development Management Team has advised that because it is an existing access which served the trading estate it is considered to be acceptable, provided adequate visibility splays are maintained. The s106 agreement would secure the adoption of some of the applicant's land in order to ensure that the visibility splays are maintained, even though the likelihood of them being obstructed is considered to be low.
237. Tracking diagrams have been submitted which demonstrate that all vehicles could enter and leave the site in a forward gear including an 11m refuse vehicle, emergency vehicles and rigid servicing vehicles up to 10m in length.
238. The open areas of the site would be a shared surface for pedestrians, cyclists and vehicles in a mews type arrangement. Pedestrian and cyclist access to the site would

be from Denmark Hill, Valmar Road, and Milkwell Yard which would be provided with landscaping and lighting, and there would be bollards across the access from Milkwell Yard to prevent vehicle entering from this direction. The s106 agreement would secure the pedestrian and cyclist routes through the site, together with resurfacing and lighting to Milkwell Yard. TfL have raised concerns that there is no pavement into the site from Valmar Road to provide safe access for pedestrians and whilst this is noted, traffic speeds would be low given the shared nature of the route and this is considered to be acceptable.

239. Servicing – All of the servicing for the development would take place from within the site and would be overseen by the site management. Servicing would take place along the route to Milkwell Yard, with vehicles able to turn either at the corner of the Main Block and Block A, or next to the bank of three car parking spaces. Two 10m rigid servicing vehicles could be present on the site at the same time, and there would be a waiting bay next to Block A which could accommodate a 7.5 tonne box van for smaller vehicles to wait if necessary.
240. Large deliveries to the workspace and hotel would be scheduled to take place outside of the morning and evening peaks, although it is recommended that servicing is further restricted to avoid school drop off and pick up times given that the proximity to Crawford Primary School. Hotel servicing is likely to include postal deliveries, laundry services as this would be undertaken off-site, food, drink and stationary mainly delivered by box vans or sprinter vans, whilst residential deliveries would likely be post, online purchases and removals. A condition limiting servicing hours for the non-residential uses to 9am to 3pm and 4pm-8pm Mondays to Fridays, 8am to 8pm on Saturdays and not at all on Sundays and Bank Holidays has been included in the draft recommendation together with a condition for a detailed servicing management plan, and a servicing bond would be secured through the s106 agreement.
241. Taxis would be able to drive close to the hotel entrance, and no coaches would be permitted to enter the site, including smaller coaches. A condition to this effect is recommended, and the lack of coach access could be conveyed to patrons on the hotel website and when bookings are made.
242. Separate residential and commercial refuse stores would be provided throughout the development and a condition to secure these has been included in the draft recommendation. Residential bins would be moved by the site management to a holding area next to Block A on collection days, and commercial refuse would be collected by a private contractor.
243. Trip generation – The proposed development would result in 16 and 10 net additional two-way vehicle movements in the morning and evening peak hours respectively compared to the existing site if it were fully occupied; this is for all vehicles including servicing vehicles and taxis. There would be 12 x 2-way servicing vehicle movements per day. These figures are higher than those predicted by the applicant, but would not have a noticeable adverse impact upon the surrounding road network. The applicant has also provided travel plans to encourage sustainable modes of travel, and a condition to secure these is recommended. An objector has raised concerns that the existing trip generation figures are inaccurate and overstate the number of existing vehicle movements because the trading estate has not been fully occupied for many

years. Whilst it is noted, the TS has been prepared in accordance with usual practice and it is legitimate to take all of the existing buildings into account because they are lawful uses, irrespective of their condition or the last time they were used.

244. Cycle parking - The draft London Plan requires 104 long-stay and 8 short-stay cycle parking spaces to serve the development. The proposal would exceed this by providing 109 long-stay and 13 short-stay spaces at various locations across the site, with cycle parking provided within each block and in the public realm. Transport for London (TfL) has raised concerns regarding the size and accessibility of some of the cycle stores, and the plans have been amended to address this. A condition is recommended requiring full details of the cycle parking spaces to be provided, including a requirement for a minimum of 25% Sheffield stands for the residential cycle parking as requested by TfL. The plans have also been amended to include shower facilities in the basement of the Main Block for the proposed workspace.
245. TfL has advised that if the cycle hire docking station zone is extended into Camberwell then a contribution of £110k should be provided towards the provision of a docking station within the town centre. The applicant has offered a contribution of £55k towards a docking station and officers recommend that this be accepted. A clause would be included in the s106 agreement to secure this contribution in the event that it is agreed that the cycle hire zone will be extended into Camberwell within the first two years of occupation of the development.
246. Car parking –There would be five accessible parking spaces within the development, one of which would be for a car club space, another for the employment space, and the remaining three for the wheelchair accessible housing units. All of the parking spaces would be fitted with active electric vehicle charging points which would be secured by way of a condition, and the s106 agreement would prevent future occupiers from obtaining parking permits in the surrounding streets and would secure car club membership for future occupiers. The nearest car club space is currently a 10 minute walk away on Camberwell Grove, so the proposed provision would be of benefit to the local community and over time could help to reduce parking pressure on the surrounding street.
247. Two of the parking spaces would be located near the Valmar Road entrance and three would be close to Milkwell Yard. TfL has raised concerns regarding the location of the two spaces closest to Valmar Road on the basis that there would be no crossing for pedestrians linking them to the wheelchair accessible units in Block B. Whilst this is noted, these spaces could be for the car club and employment space and in any event, vehicle movements from these parking bays are likely to be infrequent given the site's high level of public transport access and proximity to shops and services in the town centre. It is also noted that they would be located approximately 15m from the vehicular access into the site.
248. Impact on public transport – Officers consider that the number of public transport trips which would be generated by the development would be 101 and 64 additional two way public transport trips during the morning and evening peaks which are higher figures than those provided by the applicant. TfL has not raised any issues regarding impact upon public transport capacity, and the s106 agreement would secure count

down facilities at two bus stops in the vicinity of the site.

249. To conclude in relation to transport, whilst it is noted that the proposal would increase the number of vehicle trips to and from the site, the increase would be limited and would not result in any adverse impacts upon the surrounding roads. All of the servicing would take place from within the site, and the proposed cycle parking and car parking arrangements are considered to be acceptable.

### **Air quality**

250. 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.
251. An Air Quality Assessment has been submitted with the application which considers the impact of the proposal on air quality and the effect of air quality on future occupiers of the development. It recommends a number of measures including a construction management plan to minimise dust, and prioritising the site for pedestrians and cyclists. The assessment concludes that the proposed development would be air quality neutral.
252. The Air Quality Assessment has been reviewed by EPT and is found to be acceptable subject to a number of conditions, including requiring a detailed construction management plan to be submitted for approval together with full details of the proposed combined heat and power plant and these have been included in the draft recommendation.

### **Contamination**

253. 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.
254. A Stage 2 Site Investigation Report has been submitted which advises that no ground contamination concentrations have been found at the site. The report has been reviewed by EPT and the Environment Agency (EA) which have both requested a condition to deal with unexpected contamination if it is found and this has been included in the draft recommendation. Concerns have been raised by a neighbouring resident regarding the removal of asbestos from the site and that this may not be undertaken correctly. On the advice of EPT a condition has been included in the draft recommendation to deal with this issue.

### **Flood risk and drainage**

255. 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. Strategic policy 13 of the Core Strategy sets a target that major development should reduce surface water run-off by more than

50%, and the proposal would comply with this policy. Concerns have been raised by neighbouring residents that the proposal could result in an increased risk of flooding

256. The site is located in flood zone 1 which has a low risk of flooding. A Flood Risk Assessment (FRA) has been submitted in any event and has been reviewed by the Environment Agency (EA). The EA has not raised any concerns regarding flood risk, but has requested conditions relating to ground water contamination which have been included in the draft recommendation.
257. A report detailing Sustainable Urban Drainage (SUDs) measures which could feasibly be incorporated into the development has been submitted, together with a Basement Impact Assessment. The site is entirely hardsurfaced and impermeable at present, and the proposal would include permeable paving, soft landscaping including lawns at the rear of Block B and shrub planting throughout the site and green and brown roofs. The application has been reviewed by the Council's Flood Risk and Urban Drainage Team which has no objection to the proposals in terms of flood risk, and has recommended conditions for further details of the SUDs measures and waterproofing of the proposed basement. No objections have been raised by Thames Water.

### **Sustainable development implications**

258. London Plan Policy 5.2 sets out that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy **Be lean**: use less energy; **Be clean**: supply energy efficiently; **Be green**: use renewable energy. This policy requires non-residential development to achieve a carbon dioxide improvement of 35% beyond Building Regulations Part L 2013, and for residential developments to achieve carbon zero.
259. The applicant has submitted an Energy Strategy Report in support of the application, based on the Mayor's energy hierarchy.
260. **Be lean** - Measures under this category would include high levels of insulation, ventilation measures and lighting controls.  
**Be clean** – The proposal would include Combined Heat and Power (CHP) plant for the main block and workspace within Block A which would be located in the basement of the Main Block. There are no planned district heating networks in this area, however, the s106 agreement should require the development to be future-proofed for connection in the event that a network were to come online.  
**Be green** – It is proposed to install an air source heat pump and photovoltaic panels within the development.
261. A combination of the above measures would result in a 39.27% reduction in carbon dioxide emissions when compared with a scheme compliant with the Building Regulations. This would comprise a 35.27%% reduction for the residential element (carbon zero is required) and a 39.87% reduction for the non-residential elements which would comply with the adopted London Plan. A contribution of £73,328 would be provided towards the Council's Carbon Off-set fund and it is recommended that the achieved carbon savings be reviewed post-construction, which may require an adjustment to the s106 contribution amount.
262. Strategic policy 13 of the Core Strategy requires major development to achieve a

reduction in carbon dioxide of 20% from using on-site or local low and zero carbon sources of energy.

The proposed development would achieve a 34.84% reduction through the use of CHP, ASHPs and PVs and as such would comply with this policy.

263. A BREEAM pre-assessment has been submitted in support of the application. The proposed development would achieve BREEAM 'excellent' which would be policy compliant, and a condition to secure this is recommended. Thermal heating reports have also been submitted, and no overheating issues have been identified. It is noted that the buildings would be predominantly brick without extensive areas of glazing and could be mechanically or naturally ventilated.
264. 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 checklist to address this requirement. These issues are also considered in a number of the other planning application documents including the Energy Strategy report and sustainability checklist.
265. The proposed development would significantly increase the number of jobs at the site, would contribute to spending in the local economy and would help to support the town centre by generating footfall, all of which would have positive social and economic impacts. A number of energy efficiency measures would be incorporated to reduce the development's carbon dioxide emissions, and a contribution towards the Council's carbon off-set green fund would be provided.

### **Archaeology**

266. 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.
267. The entire site is located in the Camberwell Green Archaeological Priority Zone and an Archaeological desk based assessment has been submitted in support of the application. It has been reviewed by the Council's Archaeologist, and a number of conditions have been included in the draft recommendation and a contribution would be secured through the s106 agreement.

### **Ecology**

268. 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.

269. The Council's Ecology Officer has advised that there is currently extremely limited ecological habitat present on the site. The proposed development would incorporate a number of features to increase biodiversity including new trees, planting within the landscaped areas, and green roofs. It is recommended that these be changed to biodiverse roofs by way of a condition, and that Swift bricks be incorporated into the development; the relevant conditions have been included in the draft recommendation.

#### **Planning obligations (s.106 undertaking or agreement)**

270. 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.

<b>Planning obligation</b>	<b>Mitigation</b>	<b>Applicant's position</b>
Archaeology	£11,171.00	Agreed
Affordable housing	35% by habitable room, to be completed before more than 50% of the private residential units can be occupied.	Agreed
Affordable housing monitoring fee	£1,852.90	Agreed
Affordable housing review mechanism	Early and late stage review mechanisms, early review if substantial implementation has not occurred within 24 months and late stage at 75% of the private residential occupation/sales	Agreed
Employment during construction	15 sustained jobs for unemployed Southwark residents, 15 short courses and 3 construction industry apprenticeships or a payment of £71,250.00 for shortfall, and the associated employment, skills and business support plan	Agreed
Employment in the	30 sustained jobs for unemployed Southwark Residents at the end phase, or	Agreed



development	meet any shortfall through the Employment in the End Use Shortfall Contribution (the maximum Employment in the End Use Shortfall Contribution is £129,000, based on £4,300 per job) and the associated skills and employment plan	
Local procurement	During construction and in the end use	Agreed
Delivery of the employment space	All of the employment space in the Main block to be delivered before the hotel can be occupied. Employment space within Block B to be provided with knock-out panels and potential for larger door openings in accordance with the application drawings.	Agreed
Loss of B class contribution	£6,645.45	Agreed
Provision of 10% affordable workspace	In accordance with the terms provided earlier in the report including provision to enable Ad Events to return to the site should they wish.	Agreed
Provision of a workspace marketing and management plan	The plan must detail measures to ensure that employment space within the Main Block is prioritised for people working at the site during working hours.	Agreed
Hotel management plan	Management plan for day-to-day operation of the hotel including the external spaces	Agreed
Community use agreement	To secure use of the ancillary facilities in the Main Block for members of the public outside of working hours in accordance with the details provided earlier in the report	Agreed
Public access to be maintained through the site	Routes to be secured through the site in accordance with the application drawings; removal of the existing gates across the Valmar Road access and fixing open of the existing gates on the Denmark Hill route.	Agreed
Highway works	S278 to secure the following:	All agreed

	<ul style="list-style-type: none"> <li>- Prior to works commencing on site (including any demolition) a joint condition survey to be arranged with Southwark Highway Development Team;</li> <li>- Resurface Milkwell Yard using materials in accordance with Southwark Streetscape Design Manual (SSDM);</li> <li>- Vehicle crossover on Valmar Road to be reconstructed to the current SSDM standards;</li> <li>- Repair any damage to the highway due to construction activities for the development including construction work and the movement of construction vehicles;</li> <li>- Provision of traffic calming measures in the form of a raised table on Valmar Road and a raised entry treatment at the Valmar Road / Morna Road junction.</li> </ul> <p style="text-align: center;"><u>Other transport related works:</u></p> <ul style="list-style-type: none"> <li>-Provision of new lighting to Milkwell Yard;</li> <li>- Contributions towards bus improvement measures comprising: <ul style="list-style-type: none"> <li>- £60k for the provision of countdown facilities at two bus stops on Denmark Hill closest to the site and one on Coldharbour Lane closest to the site</li> </ul> </li> </ul> <p>Adoption of the land required for visibility splays at the Valmar Road entrance.</p>	
Delivery/service management plan bond	£12,036	Agreed
TfL cycle hire contribution	£110k towards a cycle hire docking station in the town centre in the event that the cycle hire zone is agreed to be extended into Camberwell within 2 years of the occupation	The applicant has offered £55k

	of the development.	and it is recommended that this be accepted.
Car club space and membership	Provision of a car club space on the site and membership for future residents and employees.	Agreed
Parking permit exemption	Future residents and businesses would be prevented from obtaining parking permits for the surrounding streets.	Agreed
Carbon off-set Green fund contribution	£73,328	Agreed
Future-proof CHP	To enable connection with a district heating network in the future if feasible	Agreed
Post installation review of energy measures installed	Review to verify the carbon savings delivered with an upwards only adjustment to the carbon off-set green fund contribution if required.	Agreed
Total financial contributions	£220,033.40	Agreed
Administration and monitoring fee	£4,400.66	Agreed
Grand total	£224,434.06	Agreed

271. In the event that a satisfactory legal agreement has not been entered into by 8 March 2021 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).

### **Mayoral and Borough Community Infrastructure Levy**

272. 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.
273. 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 of approximately £558,007.24 and a Southwark CIL payment of approximately £1,399,150.51 would be required before any CIL relief is applied. Concerns have been raised following public consultation on the application regarding impact upon GP surgeries, and it is noted that Southwark CIL can be spent on health care facilities.

### **Statement of Community Involvement**

274. A Statement of Community Involvement (SCI) has been submitted which sets out the consultation which was undertaken on the proposal prior to the submission of this planning application.
275. The SCI advises that meetings were held with the Ward Councillors and Cabinet Member for Growth, and local groups including the SE5 Forum, the Camberwell Society, Camberwell College of Arts, Camberwell Community Council, Camberwell Arts, and Crawford Primary School. In February 2019 the applicant wrote to 2,018 residents and businesses including those on Valmar Road, Denmark Hill, the Samuel Lewis Trust Dwellings including its Tenants and Residents Association and other groups and Councillors outlining the proposal and inviting them to meet with the applicant and attend a public exhibition. A public exhibition was on 21<sup>st</sup> September (11am-2pm) and 25<sup>th</sup> September (5pm-9pm) at Camberwell Employment Academy, Peckham Road. It was attended by 35 people across the two days and when asked whether they supported various aspects of the proposal including the principle of mixed-use development on the site and provision of a hotel, overall 41% strongly agreed, 41% agreed, 12% were unsure, 0% disagreed and 6% strongly disagreed. Concerns raised by residents included the amount of B class floorspace, loss of light and privacy and transport impacts. In response to these concerns the quantum of B class floorspace on the site was increased, the height of proposed Block B was reduced and it was pulled further away from the Valmar Road properties, and cycle parking and accessible car parking has been provided.

### **Consultation responses from internal and divisional consultees**

276. Summarised below are the material planning considerations raised by internal and divisional consultees, along with the officer's response.
277. Environmental Protection Team  
Acceptable subject to conditions.

Officer response: Conditions incorporated in the draft recommendation.

278. Local Economy Team

Figures provided for loss of B class contribution and jobs and training targets.

Officer response: These would be secured through the s106 agreement.

279. Highways Development Management

- Details of visibility splay at Valmar Road entrance required;
- Vehicle tracking for a 10.5m bus is not feasible;  
S278 agreement required for highway works;
- Construction management plan and servicing management plan required;
- Gates at the Valmar Road entrance must be at least 6m back from the highway;
- Informatives recommended regarding surface water and constructing to adoptable standards.

Officer response: Details of the visibility splay have been provided and on balance, are acceptable. No coaches would be permitted to enter the site, and the other matters can be secured through conditions, planning obligations and informatives.

280. Flood Risk and Urban Drainage Team

Since the site is within Flood Zone 1, the low risk zone, there are no objections to the proposals in terms of flood risk to the site. Pleased to see a range of Sustainable Drainage Systems recommended in the 'SuDSmart Pro' feasibility report dated 13/03/2019 to provide attenuation to restrict surface water discharges to greenfield runoff rates including climate change allowance. Since the drainage strategy is a feasibility report, a condition to secure drainage measures is recommended. The Basement Impact Assessment (BIA) reports that groundwater was observed at two of three boreholes at the site. It is therefore recommended that the applicant incorporates appropriate waterproofing measures to protect the basement from the potential ingress of groundwater.

Officer comments: The relevant conditions have been concluded in the draft recommendation.

281. Ecology Officer

The site currently has virtually no existing habitat. There are no records of bats in the area and the existing buildings are not suitable for bat roosts. Recommend the installation of Swift bricks and biodiverse roofs.

Officer response: The relevant conditions have been included in the draft recommendation.

**Summary of consultation responses from external consultees**

282. Transport for London

Concerns raised regarding the quantum and design of the proposed cycle parking, pedestrian safety in relation to two parking spaces close to the site entrance from Valmar Road, and lack of a safe pedestrian route into the site from Valmar Road. Supportive of the parking quantum and request a cycle hire docking station contribution in the event that the cycle hire zone is extended into Camberwell.

Officer response: The plans have been amended to address the cycle parking concerns. Given the low level of vehicular traffic associated with the proposed development and proximity to shops, services and public transport, use of the parking spaces is likely to be low and pedestrian safety within the site would be acceptable. A contribution towards a docking station would be secured through the s106 agreement.

283. Metropolitan Police

The proposed development would be capable of achieving Secured by Design certification and a condition to secure this is recommended.

Officer response: A condition has been included in the draft recommendation.

284. Thames Water

There will be sufficient sewerage capacity in the sewer network to serve the development. Informatives recommended regarding discharge of surface water into the sewer network.

Officer comments: Informatives have been included in the draft recommendation.

285. Environment Agency

Planning permission should only be granted subject to the imposition of conditions relating to contamination and ground water.

Officer comments: Conditions have been included in the draft recommendation.

### **Community impact statement and Equalities Assessment**

286. 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:

- 287.
- a) The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
  - b) The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:
    - Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
    - Take steps to meet the needs of persons who share a relevant protected

- characteristic that are different from the needs of persons who do not share it
      - Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low
    - c) The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to tackle prejudice and promote understanding.
288. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.
289. The Council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights
290. The Council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application. The application would result in the demolition of a number of buildings which although now all vacant, formerly provided accommodation for a number of small businesses. The applicant has submitted a draft Business Relocation Strategy and only one of the former businesses on the site has expressed an interest in potentially returning to the site in the completed development. The s106 agreement would ensure that this business is given this opportunity should they wish to take it. The development would increase jobs at the site, would provide affordable workspace for a range of businesses, and would provide affordable and family housing including wheelchair accessible housing with dedicated parking, all of which would have positive equality impacts.

### **Human rights implications**

291. 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.
292. This application has the legitimate aim of providing new employment floorspace, a hotel and residential units. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

### **Positive and proactive statement**

293. 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.

### **Positive and proactive engagement: summary table**

Was the pre-application service used for this application	Yes
If the pre-application service was used for this application, was the advice given followed?	Partially
Was the application validated promptly?	Yes
If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	Yes
To help secure a timely decision, did the case officer submit their recommendation in advance of the statutory determination date?	No

### Conclusion on planning issues

294. The proposed development is considered to be acceptable in land use terms and would result in a number of positive impacts including job creation, the provision of good quality employment space, a new hotel which would help to support the town centre, and much needed residential units including policy compliant affordable housing. Although there would be a reduction in B class floorspace on the site, this is considered to have been adequately justified through marketing evidence and the proposal would result in a net increase in jobs at the site. The proposed hotel would not result in an overconcentration of visitor accommodation in the locality and would provide facilities which would be open to members of the public during the evenings and at weekends. It is considered that the design of the proposal would be of a high standard which would preserve the character, appearance and setting of this part of the Camberwell Green Conservation Area, and notwithstanding a shortfall in communal amenity space, a very good standard of residential accommodation would be provided together with a policy compliant mix of units and ground floor wheelchair accessible units. Whilst there would be some amenity impacts, most of these would not be significant. The exception to this is 44 and 46 Denmark Hill and some sunlight impacts to some units within the Samuel Lewis Trust Dwellings but for the reasons set out in full earlier in the report, these are not considered to be so significant that they would outweigh the positive impacts of the proposal. The transport impacts of the proposal are considered to be acceptable, and planning conditions and a s106 agreement would ensure that issues such as carbon dioxide emissions, air quality, ground contamination, surface water drainage, archaeology and ecology would all be adequately dealt with. It is therefore recommended that planning permission be granted, subject to the completion of a s106 agreement and conditions.



**BACKGROUND DOCUMENTS**

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

**APPENDICES**

<b>No.</b>	<b>Title</b>
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Recommendation

**AUDIT TRAIL**

<b>Lead Officer</b>	Simon Bevan, Director of Planning	
<b>Report Author</b>	Victoria Lewis, Team Leader (Planning) <a href="mailto:Victoria.Lewis@southwark.gov.uk">Victoria.Lewis@southwark.gov.uk</a>	
<b>Version</b>	Final	
<b>Dated</b>	19 August 2020	
<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments included</b>
Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
<b>Date final report sent to Constitutional Team</b>		21 August 2020

## Consultation undertaken

**Site notice date:**

**Press notice date:** n/a.

**Case officer site visit date:** n/a

**Neighbour consultation letters sent:** 13/07/2020

### Internal services consulted

Flood Risk Management & Urban Drainage  
 Highways Development and Management  
 Waste Management  
 Ecology  
 Design and Conservation Team [Formal]  
 Urban Forester  
 Design and Conservation Team [Formal]  
 Highways Development and Management  
 Flood Risk Management & Urban Drainage  
 Urban Forester  
 Waste Management  
 Transport Policy  
 Archaeology

### Statutory and non-statutory organisations

Environment Agency  
 Thames Water  
 Transport for London  
 EDF Energy

London Fire & Emergency Planning Authority  
 Metropolitan Police Service (Designing Out Crime)

Planning Policy

EDF Energy

Environment Agency

London Fire & Emergency Planning Authority  
 Planning Policy  
 Metropolitan Police Service (Designing Out Crime)  
 Transport for London

Thames Water

**Neighbour and local groups consulted:**

311 Samuel Lewis Trust Estate Warner Road London  
 310 Samuel Lewis Trust Estate Warner Road London  
 327 Samuel Lewis Trust Estate Warner Road London  
 326 Samuel Lewis Trust Estate Warner Road London  
 325 Samuel Lewis Trust Estate Warner Road London  
 330 Samuel Lewis Trust Estate Warner Road London  
 409 Samuel Lewis Trust Estate Warner Road London  
 408 Samuel Lewis Trust Estate Warner Road London  
 407 Samuel Lewis Trust Estate Warner Road London  
 412 Samuel Lewis Trust Estate Warner Road London  
 411 Samuel Lewis Trust Estate Warner Road London  
 410 Samuel Lewis Trust Estate Warner Road London  
 109 Samuel Lewis Trust Estate Warner Road London  
 114 Samuel Lewis Trust Estate Warner Road London  
 113 Samuel Lewis Trust Estate Warner Road London  
 112 Samuel Lewis Trust Estate Warner Road London  
 243 Samuel Lewis Trust Estate Warner Road London  
 242 Samuel Lewis Trust Estate Warner Road London  
 211 Samuel Lewis Trust Estate Warner Road London  
 Flat B 1 Valmar Road London  
 Flat A 1 Valmar Road London  
 Ground Floor Flat 11 Valmar Road London  
 4A Morna Road London SE5 9NJ  
 9 Butterfly Walk Denmark Hill London  
 52-54 Denmark Hill London SE5 8RZ  
 First Floor And Second Floor 48-54 Denmark Hill London  
 11A Daneville Road London SE5 8SE  
 31 Denmark Hill London SE5 8RS  
 9 Daneville Road London SE5 8SE  
 1-3 Butterfly Walk Denmark Hill London  
 62 Denmark Hill London SE5 8RZ  
 8 Denmark Hill London SE5 8RZ  
 42 Denmark Hill London SE5 8RZ  
 5 Butterfly Walk Denmark Hill London  
 33 Denmark Hill London SE5 8RS  
 43 Denmark Hill London SE5 8RS  
 36 Denmark Hill London SE5 8RZ  
 27 Denmark Hill London SE5 8RS  
 339 Samuel Lewis Trust Estate Warner Road London  
 338 Samuel Lewis Trust Estate Warner Road London  
 337 Samuel Lewis Trust Estate Warner Road London  
 342 Samuel Lewis Trust Estate Warner Road London  
 341 Samuel Lewis Trust Estate Warner Road London  
 340 Samuel Lewis Trust Estate Warner Road London  
 333 Samuel Lewis Trust Estate Warner Road London  
 332 Samuel Lewis Trust Estate Warner Road London  
 331 Samuel Lewis Trust Estate Warner Road London  
 336 Samuel Lewis Trust Estate Warner Road London  
 335 Samuel Lewis Trust Estate Warner Road London  
 334 Samuel Lewis Trust Estate Warner Road London  
 403 Samuel Lewis Trust Estate Warner Road London  
 402 Samuel Lewis Trust Estate Warner Road London  
 401 Samuel Lewis Trust Estate Warner Road London  
 406 Samuel Lewis Trust Estate Warner Road London  
 405 Samuel Lewis Trust Estate Warner Road London  
 404 Samuel Lewis Trust Estate Warner Road London  
 345 Samuel Lewis Trust Estate Warner Road London  
 344 Samuel Lewis Trust Estate Warner Road London  
 343 Samuel Lewis Trust Estate Warner Road London  
 348 Samuel Lewis Trust Estate Warner Road London  
 347 Samuel Lewis Trust Estate Warner Road London  
 346 Samuel Lewis Trust Estate Warner Road London





227 Samuel Lewis Trust Estate Warner  
 Road London  
 232 Samuel Lewis Trust Estate Warner  
 Road London  
 231 Samuel Lewis Trust Estate Warner  
 Road London  
 230 Samuel Lewis Trust Estate Warner  
 Road London  
 303 Samuel Lewis Trust Estate Warner  
 Road London  
 302 Samuel Lewis Trust Estate Warner  
 Road London  
 301 Samuel Lewis Trust Estate Warner  
 Road London  
 306 Samuel Lewis Trust Estate Warner  
 Road London  
 305 Samuel Lewis Trust Estate Warner  
 Road London  
 304 Samuel Lewis Trust Estate Warner  
 Road London  
 241 Samuel Lewis Trust Estate Warner  
 Road London  
 240 Samuel Lewis Trust Estate Warner  
 Road London  
 239 Samuel Lewis Trust Estate Warner  
 Road London  
 244 Samuel Lewis Trust Estate Warner  
 Road London  
 210 Samuel Lewis Trust Estate Warner  
 Road London  
 209 Samuel Lewis Trust Estate Warner  
 Road London  
 214 Samuel Lewis Trust Estate Warner  
 Road London  
 213 Samuel Lewis Trust Estate Warner  
 Road London  
 212 Samuel Lewis Trust Estate Warner  
 Road London  
 205 Samuel Lewis Trust Estate Warner  
 Road London  
 204 Samuel Lewis Trust Estate Warner  
 Road London  
 203 Samuel Lewis Trust Estate Warner  
 Road London  
 208 Samuel Lewis Trust Estate Warner  
 Road London  
 207 Samuel Lewis Trust Estate Warner  
 Road London  
 206 Samuel Lewis Trust Estate Warner  
 Road London  
 223 Samuel Lewis Trust Estate Warner  
 Road London  
 222 Samuel Lewis Trust Estate Warner  
 Road London  
 221 Samuel Lewis Trust Estate Warner  
 Road London

226 Samuel Lewis Trust Estate Warner  
 Road London  
 225 Samuel Lewis Trust Estate Warner  
 Road London  
 224 Samuel Lewis Trust Estate Warner  
 Road London  
 217 Samuel Lewis Trust Estate Warner  
 Road London  
 216 Samuel Lewis Trust Estate Warner  
 Road London  
 215 Samuel Lewis Trust Estate Warner  
 Road London  
 220 Samuel Lewis Trust Estate Warner  
 Road London  
 219 Samuel Lewis Trust Estate Warner  
 Road London  
 218 Samuel Lewis Trust Estate Warner  
 Road London  
 Flat 4 338 Camberwell New Road London  
 Flat 3 9 Valmar Road London  
 Flat 3 338 Camberwell New Road London  
 Flat 7 338 Camberwell New Road London  
 Flat 6 338 Camberwell New Road London  
 Flat 5 338 Camberwell New Road London  
 Flat 2 9 Valmar Road London  
 Flat 2 338 Camberwell New Road London  
 Flat 2 15 Valmar Road London  
 Flat 3 24 Valmar Road London  
 Flat 3 15 Valmar Road London  
 Flat 2 24 Valmar Road London  
 Ground Floor Flat 38 Valmar Road London  
 Ground Floor Flat 26 Valmar Road London  
 Ground Floor Flat 17 Valmar Road London  
 Ground Floor Flat 52 Valmar Road London  
 44A Valmar Road London SE5 9NG  
 Ground Floor Flat 4 Valmar Road London  
 First Floor And Second Floor Flat 6A  
 Coldharbour Lane London  
 First Floor And Second Floor Flat 46  
 Denmark Hill London  
 First Floor And Second Floor Flat 44  
 Denmark Hill London  
 Flat 1 43 Denmark Hill London  
 37A Denmark Hill London SE5 8RS  
 First Floor Flat 11 Valmar Road London  
 First Floor Flat 4 Valmar Road London  
 First Floor Flat 3 Daneville Road London  
 Caretakers Flat Butterfly Walk Denmark Hill  
 29B Denmark Hill London SE5 8RS  
 First Floor And Second Floor Flat 22  
 Denmark Hill London  
 First Floor And Second Floor Flat 336  
 Camberwell New Road London  
 First Floor And Second Floor Flat 26  
 Denmark Hill London  
 Flat 1 9 Valmar Road London

Flat 1 338 Camberwell New Road London  
 Flat 1 Wren Road London  
 Ground Floor Flat 7 Valmar Road London  
 Flat 1 15 Valmar Road London  
 Flat 1 24 Valmar Road London  
 44B Valmar Road London SE5 9NG  
 First Floor Flat 38 Valmar Road London  
 First Floor Flat 26 Valmar Road London  
 42B Valmar Road London SE5 9NE  
 42A Denmark Hill London SE5 8RZ  
 First Floor Flat 41 Denmark Hill London  
 Jaymac House Valmar Road London  
 Ground Floor 8-12 Orpheus Street London  
 Morrisons Butterfly Walk Denmark Hill  
 Workshop Blocks C And D Samuel Lewis  
 Trust Estate Warner Road  
 Estate Office Samuel Lewis Trust Estate  
 Warner Road  
 Second Floor Flat 76 Denmark Hill London  
 42C Valmar Road London SE5 9NG  
 42B Denmark Hill London SE5 8RZ  
 First To Third Floors 23 Camberwell Green  
 London  
 Ground Floor 21-22 Camberwell Green  
 London  
 Top Floor Flat 6 Valmar Road London  
 Second Floor Flat 4 Valmar Road London  
 42A Valmar Road London SE5 9NG  
 44C Valmar Road London SE5 9NG  
 Second Floor Flat 26 Valmar Road London  
 Second Floor Flat 11 Valmar Road London  
 Rear Of 44-50 Denmark Hill London  
 Rear Of 42 Denmark Hill London  
 Shop 16 Coldharbour Lane London  
 348 Camberwell New Road London SE5  
 0RW  
 344 Camberwell New Road London SE5  
 0RW  
 342 Camberwell New Road London SE5  
 0RW  
 Shop 14 Coldharbour Lane London  
 352B Camberwell New Road London SE5  
 0RW  
 First Floor And Second Floor 352-354  
 Camberwell New Road London  
 539 Samuel Lewis Trust Estate Warner  
 Road London  
 538 Samuel Lewis Trust Estate Warner  
 Road London  
 537 Samuel Lewis Trust Estate Warner  
 Road London  
 542 Samuel Lewis Trust Estate Warner  
 Road London  
 541 Samuel Lewis Trust Estate Warner  
 Road London  
 540 Samuel Lewis Trust Estate Warner  
 Road London  
 533 Samuel Lewis Trust Estate Warner  
 Road London  
 532 Samuel Lewis Trust Estate Warner  
 Road London  
 531 Samuel Lewis Trust Estate Warner  
 Road London  
 536 Samuel Lewis Trust Estate Warner  
 Road London  
 535 Samuel Lewis Trust Estate Warner  
 Road London  
 534 Samuel Lewis Trust Estate Warner  
 Road London  
 57 Warner Road London SE5 9NE  
 55 Warner Road London SE5 9NE  
 53 Warner Road London SE5 9NE  
 69 Warner Road London SE5 9NE  
 61 Warner Road London SE5 9NE  
 59 Warner Road London SE5 9NE  
 545 Samuel Lewis Trust Estate Warner  
 Road London  
 544 Samuel Lewis Trust Estate Warner  
 Road London  
 543 Samuel Lewis Trust Estate Warner  
 Road London  
 120 Warner Road London SE5 9HQ  
 51 Warner Road London SE5 9NE  
 515 Samuel Lewis Trust Estate Warner  
 Road London  
 514 Samuel Lewis Trust Estate Warner  
 Road London  
 513 Samuel Lewis Trust Estate Warner  
 Road London  
 518 Samuel Lewis Trust Estate Warner  
 Road London  
 517 Samuel Lewis Trust Estate Warner  
 Road London  
 516 Samuel Lewis Trust Estate Warner  
 Road London  
 509 Samuel Lewis Trust Estate Warner  
 Road London  
 508 Samuel Lewis Trust Estate Warner  
 Road London  
 507 Samuel Lewis Trust Estate Warner  
 Road London  
 512 Samuel Lewis Trust Estate Warner  
 Road London  
 511 Samuel Lewis Trust Estate Warner  
 Road London  
 510 Samuel Lewis Trust Estate Warner  
 Road London  
 527 Samuel Lewis Trust Estate Warner  
 Road London  
 526 Samuel Lewis Trust Estate Warner  
 Road London  
 8 Coldharbour Lane London SE5 9PR

Unit 1 Valmar Trading Estate Valmar Road  
 Flat I 14 Coldharbour Lane London  
 Unit 4 Valmar Trading Estate Valmar Road  
 Unit 7 Valmar Trading Estate Valmar Road  
 Unit 6 Valmar Trading Estate Valmar Road  
 Flat 3 16A Denmark Hill London  
 Flat 2 16A Denmark Hill London  
 Flat 2 4A Coldharbour Lane London  
 Flat 1 4A Coldharbour Lane London  
 Flat Above 35 Denmark Hill London  
 Flat 2 10 Denmark Hill London  
 Flat 1 10 Denmark Hill London  
 Unit 1 8B Coldharbour Lane London  
 Middle Flat 17 Valmar Road London  
 Flat 2 2 Valmar Road London  
 4B Morna Road London SE5 9NJ  
 Middle Flat 52 Valmar Road London  
 69A Warner Road London SE5 9NE  
 12B Valmar Road London SE5 9NG  
 Unit 9 Wren Road Hostel 2-7 Wren Road  
 Top Floor Flat 76 Denmark Hill London  
 Ground Floor Unit 334 Camberwell New  
 Road London  
 Flat 5 334 Camberwell New Road London  
 First Floor Flat 8 Valmar Road London  
 352 Camberwell New Road London SE5  
 0RW  
 Flat C 34 Valmar Road London  
 619 Cranmere Court Warner Road London  
 624 Cranmere Court Warner Road London  
 623 Cranmere Court Warner Road London  
 622 Cranmere Court Warner Road London  
 615 Cranmere Court Warner Road London  
 614 Cranmere Court Warner Road London  
 Flat B 6 Morna Road London  
 Flat A 14 Coldharbour Lane London  
 12A Coldharbour Lane London SE5 9PR  
 Flat A 10 Coldharbour Lane London  
 Flat 4 67 Warner Road London  
 Flat 3 67 Warner Road London  
 37 Denmark Hill London SE5 8RS  
 31-33A Denmark Hill London SE5 8RS  
 15 Butterfly Walk Denmark Hill London  
 8 Butterfly Walk Denmark Hill London  
 6 Butterfly Walk Denmark Hill London  
 4A Butterfly Walk Denmark Hill London  
 17 Butterfly Walk Denmark Hill London  
 16 Butterfly Walk Denmark Hill London  
 25 Denmark Hill London SE5 8RT  
 23 Denmark Hill London SE5 8RP  
 39 Denmark Hill London SE5 8RS  
 Joiners Arms 35 Denmark Hill London  
 2 Wren Road London SE5 8QS  
 20A Camberwell Green London SE5 7AA  
 23 Camberwell Green London SE5 7AA  
 Silver Buckle 18 Camberwell Green London  
 2 Camberwell Church Street London SE5  
 8QY  
 20 Camberwell Green London SE5 7AA  
 64 Denmark Hill London SE5 8RZ  
 46 Denmark Hill London SE5 8RZ  
 44 Denmark Hill London SE5 8RZ  
 72 Denmark Hill London SE5 8RZ  
 68-70 Denmark Hill London SE5 8RZ  
 66 Denmark Hill London SE5 8RZ  
 12 Denmark Hill London SE5 8RZ  
 10 Denmark Hill London SE5 8RZ  
 41 Denmark Hill London SE5 8RS  
 38 Denmark Hill London SE5 8RZ  
 24-26 Denmark Hill London SE5 8RZ  
 22 Denmark Hill London SE5 8RZ  
 16 Valmar Road London SE5 9NG  
 20 Valmar Road London SE5 9NG  
 12 Valmar Road London SE5 9NG  
 14 Valmar Road London SE5 9NG  
 13 Valmar Road London SE5 9NG  
 36 Valmar Road London SE5 9NG  
 46 Valmar Road London SE5 9NG  
 32 Valmar Road London SE5 9NG  
 34 Denmark Hill London SE5 8RZ  
 14 Butterfly Walk Denmark Hill London  
 29 Denmark Hill London SE5 8RS  
 10 Butterfly Walk Denmark Hill London  
 7 Butterfly Walk Denmark Hill London  
 56-60 Denmark Hill London SE5 8RZ  
 19 Crawford Road London SE5 9NF  
 17 Crawford Road London SE5 9NF  
 1 Crawford Road London SE5 9NF  
 1 Valmar Road London SE5 9NG  
 3 Crawford Road London SE5 9NF  
 21 Crawford Road London SE5 9NF  
 5B Daneville Road London SE5 8SE  
 7A Daneville Road London SE5 8SE  
 13 Butterfly Walk Denmark Hill London  
 16 Denmark Hill London SE5 8RZ  
 40 Denmark Hill London SE5 8RZ  
 7B Daneville Road London SE5 8SE  
 12 Camberwell Church St Camberwell  
 London  
 Unit 3 Valmar Trading Estate Valmar Road  
 Flat 38 Denmark Hill London  
 Basement Flat 3 Daneville Road London  
 Living Accommodation 18 Camberwell  
 Green London  
 12 Butterfly Walk Denmark Hill London  
 11 Butterfly Walk Denmark Hill London  
 Flat A 1 Tillings Close London  
 Ground Floor And Part First Floor Unit 2  
 Valmar Trading Estate Valmar Road  
 Basement Right Unit 2 Valmar Trading  
 Estate Valmar Road  
 Flat B 1 Tillings Close London



Flat 5 16A Denmark Hill London  
 Flat 2 8A Coldharbour Lane London  
 Flat 1 8A Coldharbour Lane London  
 Flat 2 16 Denmark Hill London  
 Flat 1 16 Denmark Hill London  
 76-78 Denmark Hill London SE5 8RZ  
 Apartment 3 3 Valmar Road London  
 Apartment 2 3 Valmar Road London  
 First Floor 2A And 2B Unit 2 Valmar Trading  
 Estate Valmar Road  
 Second Floor Flat 1A Milkwell Yard London  
 First Floor Flat 1A Milkwell Yard London  
 First Floor To Third Floor 10 Denmark Hill  
 London  
 Flat B 72 Denmark Hill London  
 Flat A 72 Denmark Hill London  
 Flat C 2 Morna Road London  
 Flat 1 16A Denmark Hill London  
 14 Denmark Hill London SE5 8RZ  
 Unit 15 Wren Road Hostel 2-7 Wren Road  
 Unit 13 Wren Road Hostel 2-7 Wren Road  
 Unit 7 Wren Road Hostel 2-7 Wren Road  
 Flat B 2 Morna Road London  
 Flat A 2 Morna Road London  
 Flat 5 24 Valmar Road London  
 First Floor 2A Unit 2 Valmar Trading Estate  
 Valmar Road  
 First Floor 1A And 1B Unit 2 Valmar Trading  
 Estate Valmar Road  
 29C Denmark Hill London SE5 8RS  
 Basement Left Unit 2 Valmar Trading Estate  
 Valmar Road  
 Basement Ground Floor And Part First Floor  
 Valmar Trading Estate Valmar Road  
 First Floor 2B Unit 2 Valmar Trading Estate  
 Valmar Road  
 Flat 4 16A Denmark Hill London  
 23B Denmark Hill London SE5 8RP  
 Flat 2 70A Denmark Hill London  
 Flat 1 70A Denmark Hill London  
 2 Warner Road London SE5 9LU  
 27A Denmark Hill London SE5 8RS  
 Apartment 3 24A Denmark Hill London  
 23A Denmark Hill London SE5 8RP  
 Flat 2 23 Denmark Hill London  
 Flat 1 23 Denmark Hill London  
 350 Camberwell New Road London SE5  
 0RW  
 338 Camberwell New Road London SE5  
 0RW  
 340-344 Camberwell New Road London  
 SE5 0RW  
 25 Camberwell Green London SE5 7AB  
 348A Camberwell New Road London SE5  
 0RW  
 Flat 5 70A Denmark Hill London  
 Flat 4 70A Denmark Hill London  
 Flat 3 70A Denmark Hill London  
 354 Camberwell New Road London SE5  
 0RW  
 354A Camberwell New Road London SE5  
 0RW  
 336 Camberwell New Road London SE5  
 0RW  
 Second Floor Flat 36 Valmar Road London  
 Ground Floor Flat 36 Valmar Road London  
 Camberwell Bazaar Jute House Valmar  
 Trading Estate Valmar Road  
 Flat 2 43 Denmark Hill London  
 First Floor Flat 36 Valmar Road London  
 Flat 5 16 Denmark Hill London  
 Flat 4 16 Denmark Hill London  
 Flat 3 16 Denmark Hill London  
 62B Denmark Hill London SE5 8RZ  
 62A Denmark Hill London SE5 8RZ  
 Flat B First Floor Jute House Valmar Trading  
 Estate Valmar Road  
 Flat 5 67 Warner Road London  
 Flat 3 23 Crawford Road London  
 Flat 2 23 Crawford Road London  
 Apartment 2 24A Denmark Hill London  
 Apartment 1 24A Denmark Hill London  
 26A Denmark Hill London SE5 8RZ  
 Flat 3 8B Coldharbour Lane London  
 Flat 2 8B Coldharbour Lane London  
 Flat 1 8B Coldharbour Lane London  
 Flat 1 23 Crawford Road London  
 Unit 2 8B Coldharbour Lane London  
 Unit 8 Wren Road Hostel 2-7 Wren Road  
 Unit 6 Wren Road Hostel 2-7 Wren Road  
 Flat C 18 Valmar Road London  
 Flat A 18 Valmar Road London  
 Flat B 18 Valmar Road London  
 10 Tillings Close London SE5 0BX  
 12 Tillings Close London SE5 0BX  
 7 Tillings Close London SE5 0BX  
 1 Tillings Close London SE5 0BX  
 8 Tillings Close London SE5 0BX  
 9 Tillings Close London SE5 0BX  
 Flat 3 2 Valmar Road London  
 Top Flat 17 Valmar Road London  
 Flat 1 2 Valmar Road London  
 40A Denmark Hill London SE5 8RZ  
 350A Camberwell New Road London SE5  
 0RW  
 Basement And Ground Floor 65 Warner  
 Road London  
 Top Flat 38 Valmar Road London  
 12C Valmar Road London SE5 9NG  
 6A Valmar Road London SE5 9NG  
 Unit 11 Wren Road Hostel 2-7 Wren Road  
 Unit 10 Wren Road Hostel 2-7 Wren Road

Community Centre Adjacent 601 Samuel  
Lewis Trust Estate Warner Road  
332C Camberwell New Road London SE5  
ORW

19 Camberwell Green London SE5 7AA  
Flat B 6 Valmar Road London  
Top Flat 74 Denmark Hill London  
18 Butterfly Walk Denmark Hill London  
Unit 22 Wren Road Hostel 2-7 Wren Road  
Unit 21 Wren Road Hostel 2-7 Wren Road  
Unit 20 Wren Road Hostel 2-7 Wren Road  
Unit 5 Wren Road Hostel 2-7 Wren Road  
Unit 4 Wren Road Hostel 2-7 Wren Road  
Unit 3 Wren Road Hostel 2-7 Wren Road  
Unit 17 Wren Road Hostel 2-7 Wren Road  
Unit 14 Wren Road Hostel 2-7 Wren Road  
Unit 12 Wren Road Hostel 2-7 Wren Road  
Unit 2 Wren Road Hostel 2-7 Wren Road  
Unit 19 Wren Road Hostel 2-7 Wren Road  
Unit 18 Wren Road Hostel 2-7 Wren Road  
Flat 1 334 Camberwell New Road London  
332B Camberwell New Road London SE5  
ORW

Flat 4 334 Camberwell New Road London  
Flat 3 334 Camberwell New Road London  
Flat 2 334 Camberwell New Road London  
64-70 Denmark Hill London SE5 8RZ  
Garage Rear Of 62 Denmark Hill London  
Studio Flat 67 Warner Road London  
Flat 6 24 Valmar Road London  
Flat 7 24 Valmar Road London  
Flat 4 24 Valmar Road London  
First To Third Floor 21-22 Camberwell Green  
London

Ground Floor Flat 8 Valmar Road London  
Second Floor Flat 8 Valmar Road London  
Flat B 34 Valmar Road London  
Flat A 34 Valmar Road London  
Flat 6 334 Camberwell New Road London  
63 Warner Road London SE5 9NE  
332 Camberwell New Road London SE5  
ORW

346 Camberwell New Road London SE5  
ORW  
Flat B 63 Warner Road London  
Apartment 1 3 Valmar Road London  
Ground Floor Flat 12 Valmar Road London  
3 Tillings Close London SE5 0BX  
4 Tillings Close London SE5 0BX  
5 Tillings Close London SE5 0BX  
6 Tillings Close London SE5 0BX  
11 Tillings Close London SE5 0BX  
2 Tillings Close London SE5 0BX  
3 Caleb Court 1 Milkwell Yard London  
2 Caleb Court 1 Milkwell Yard London  
1 Caleb Court 1 Milkwell Yard London

6 Caleb Court 1 Milkwell Yard London  
5 Caleb Court 1 Milkwell Yard London  
4 Caleb Court 1 Milkwell Yard London  
13 Tillings Close London SE5 0BX  
First Floor And Second Floor Flat 65 Warner  
Road London  
First Floor Flat 76 Denmark Hill London  
15 Tillings Close London SE5 0BX  
14 Tillings Close London SE5 0BX  
621 Cranmere Court Warner Road London  
620 Cranmere Court Warner Road London  
613 Cranmere Court Warner Road London  
618 Cranmere Court Warner Road London  
617 Cranmere Court Warner Road London  
616 Cranmere Court Warner Road London  
Flat A 50 Valmar Road London  
40 Valmar Road London SE5 9NG  
Flat A 22 Valmar Road London  
Flat C 50 Valmar Road London  
Flat B 50 Valmar Road London  
Flat B 22 Valmar Road London  
Flat 2 75 Warner Road London  
Flat 1 75 Warner Road London  
Flat A 63 Warner Road London  
10A Valmar Road London SE5 9NG  
51A Warner Road London SE5 9NE  
Flat 3 75 Warner Road London  
2 Coldharbour Lane London SE5 9PR  
12 Coldharbour Lane London SE5 9PR  
Flat B 10 Coldharbour Lane London  
5 Valmar Road London SE5 9NG  
48 Valmar Road London SE5 9NG  
7 Valmar Road London SE5 9NG  
609 Cranmere Court Warner Road London  
608 Cranmere Court Warner Road London  
607 Cranmere Court Warner Road London  
612 Cranmere Court Warner Road London  
611 Cranmere Court Warner Road London  
610 Cranmere Court Warner Road London  
603 Cranmere Court Warner Road London  
602 Cranmere Court Warner Road London  
601 Cranmere Court Warner Road London  
606 Cranmere Court Warner Road London  
605 Cranmere Court Warner Road London  
604 Cranmere Court Warner Road London  
Flat D 14 Coldharbour Lane London  
Flat C 14 Coldharbour Lane London  
Flat B 14 Coldharbour Lane London  
Flat G 14 Coldharbour Lane London  
Flat F 14 Coldharbour Lane London  
Flat E 14 Coldharbour Lane London  
Flat C 6 Morna Road London  
Flat B 8 Morna Road London  
Flat 2 67 Warner Road London  
102 Samuel Lewis Trust Estate Warner  
Road London

101 Samuel Lewis Trust Estate Warner Road London  
 Crawford Primary School Crawford Road London  
 4A Coldharbour Lane London SE5 9PR  
 2A Coldharbour Lane London SE5 9PR  
 Flat H 14 Coldharbour Lane London  
 Flat 1 67 Warner Road London  
 8A Coldharbour Lane London SE5 9PR  
 6A Coldharbour Lane London SE5 9PR  
 Flat 3 Cedartree Court 54 Valmar Road  
 Flat 2 Sycamore Court 58 Valmar Road  
 Flat 2 Oaktree Court 60 Valmar Road  
 Flat 3 Sycamore Court 58 Valmar Road  
 Flat 3 Oaktree Court 60 Valmar Road  
 Flat 3 Elmtree Court 56 Valmar Road  
 Flat 1 Oaktree Court 60 Valmar Road  
 Flat 1 Elmtree Court 56 Valmar Road  
 Flat 1 Cedartree Court 54 Valmar Road  
 Flat 2 Elmtree Court 56 Valmar Road  
 Flat 2 Cedartree Court 54 Valmar Road  
 Flat 1 Sycamore Court 58 Valmar Road  
 Flat A 10 Morna Road London  
 Flat 6 Sycamore Court 58 Valmar Road  
 Flat 6 Elmtree Court 56 Valmar Road  
 Flat B 10 Morna Road London  
 Flat A 8 Morna Road London  
 Flat A 6 Morna Road London  
 Flat 4 Oaktree Court 60 Valmar Road  
 Flat 4 Elmtree Court 56 Valmar Road  
 Flat 4 Cedartree Court 54 Valmar Road  
 Flat 5 Sycamore Court 58 Valmar Road  
 Flat 5 Elmtree Court 56 Valmar Road  
 Flat 4 Sycamore Court 58 Valmar Road  
 18-20 Denmark Hill London SE5 8RZ  
 3A Daneville Road London SE5 8SE  
 11B Daneville Road London SE5 8SE  
 4 Butterfly Walk Denmark Hill London  
 48-54 Denmark Hill London SE5 8RZ  
 28-32 Denmark Hill London SE5 8RZ  
 5A Daneville Road London SE5 8SE  
 74 Denmark Hill London SE5 8RZ  
 528 Samuel Lewis Trust Estate Warner Road London  
 521 Samuel Lewis Trust Estate Warner Road London  
 520 Samuel Lewis Trust Estate Warner Road London  
 519 Samuel Lewis Trust Estate Warner Road London  
 524 Samuel Lewis Trust Estate Warner Road London  
 523 Samuel Lewis Trust Estate Warner Road London  
 522 Samuel Lewis Trust Estate Warner Road London  
 Flat 11 Elmtree Court 56 Valmar Road  
 Flat 10 Elmtree Court 56 Valmar Road  
 Flat 9 Elmtree Court 56 Valmar Road  
 4 Coldharbour Lane London SE5 9PR  
 Flat C 8 Morna Road London  
 Flat 12 Elmtree Court 56 Valmar Road  
 Flat C 10 Coldharbour Lane London  
 10 Coldharbour Lane London SE5 9PR  
 Flat 8 Elmtree Court 56 Valmar Road  
 Flat 6 Cedartree Court 54 Valmar Road  
 Flat 5 Cedartree Court 54 Valmar Road  
 Forty And A Half Valmar Road London  
 30B Valmar Road London SE5 9NG  
 30A Valmar Road London SE5 9NG  
 29A Denmark Hill London SE5 8RS  
 18B Denmark Hill London SE5 8RZ  
 18A Denmark Hill London SE5 8RZ  
 28C Valmar Road London SE5 9NG  
 28A Valmar Road London SE5 9NG  
 28B Valmar Road London SE5 9NG  
 10C Valmar Road London SE5 9NG  
 10B Valmar Road London SE5 9NG  
 16A Coldharbour Lane London SE5 9PR  
 8B Coldharbour Lane London SE5 9PR  
 77 Warner Road London SE5 9NE  
 6 Coldharbour Lane London SE5 9PR  
 Flat L 14 Coldharbour Lane London  
 Flat K 14 Coldharbour Lane London  
 Flat 4 75 Warner Road London  
 73 Warner Road London SE5 9NE  
 71 Warner Road London SE5 9NE  
 Unit 5 Valmar Trading Estate Valmar Road  
 Flat J 14 Coldharbour Lane London  
 Camberwell Bus Garage 5 Warner Road London  
 Flat Above 6 Coldharbour Lane London  
 Flat 7 Elmtree Court 56 Valmar Road  
 Flat 3 8A Coldharbour Lane London  
 Flat Above 8 Coldharbour Lane London  
 525 Samuel Lewis Trust Estate Warner Road London  
 530 Samuel Lewis Trust Estate Warner Road London  
 529 Samuel Lewis Trust Estate Warner Road London

**Re-consultation:**

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

Flood Risk Management & Urban Drainage  
 Highways Development and Management  
 Ecology  
 Design and Conservation Team [Formal]  
 Urban Forester  
 Design and Conservation Team [Formal]  
 Highways Development and Management  
 Urban Forester  
 Transport Policy  
 Archaeology

**Statutory and non-statutory organisations**

Metropolitan Police Service (Designing O

**Neighbour and local groups consulted:**

Ground Floor Flat 38 Valmar Road London  
 Ground Floor Flat 26 Valmar Road London  
 Ground Floor Flat 17 Valmar Road London  
 542 Samuel Lewis Trust Estate Warner Road London  
 Flat C 34 Valmar Road London  
 14 Valmar Road London SE5 9NG  
 1 Crawford Road London SE5 9NF  
 42A Vicarage Grove Camberwell London  
 12 Camberwell Church St Camberwell London  
 7, Pelham Close Grove Park London  
 182 Ruskin Park House London SE5 8TN  
 43 Dylways London SE5 8HN  
 14-16 Denmark Hill London SE5 8RZ  
 51A Linnell Road Camberwell London  
 Valmar Road London SE5 9NG  
 50C Valmar Road London SE5 9NG  
 40 And A Half Valmar Road London SE5 9NG  
 8 Valmar Road London SE5 9NG  
 Grafton Quarter Grafton Road Croydon  
 221 Havil Street London SE5 7SD  
 19A Southampton Way London SE5 7SW  
 Flat 4, Comber House Comber Grove Camberwell  
 Valmar Road Camberwell London  
 17 Southwell Road Camberwell London  
 12 Kerfield Place Camberwell London  
 11 Calais Street Camberwell SE5 9LP  
 6 Maldon Close Camberwell London

21A Brunswick Park Camberwell London  
13 Fowler House McNeil Road Camberwell  
58 Linnell Road Camberwell London  
51A Linnell Road Camberwell London  
4C Morna Road Camberwell London  
17 Southwell Road Camberwell London  
14 Valmar Road London SE5 9NG  
38 Valmar Rd Camberwell London  
Flat C, 34 Valmar Road London SE5 9NG  
Suite 1, First Floor Aquasulis, 10-14 Bath Road Slough  
Flat C 18 Valmar Road London  
12C Valmar Road London SE5 9NG  
Apartment 1 3 Valmar Road London  
5 Caleb Court 1 Milkwell Yard London  
40 Valmar Road London SE5 9NG  
5 Valmar Road London SE5 9NG  
7 Valmar Road London SE5 9NG  
Flat 1 Sycamore Court 58 Valmar Road  
F/5 94, Camberwell Grove London  
46 Denmark Hill London SE5 8RZ  
Flat 3, 31 De Crespigny Park London SE58AB  
6c Morna Road camberwell SE5 9NJ  
9 Templar Street 9 Templar Street London  
39 Woodfarrs London SE5 8EX  
Church Street Hotel london SE5 8TR  
18 Wanley Road London SE5 8AT  
Tillings Close Camberwell London  
1 Honiton House London SE5 9EU  
1 Valmar Rd camberwell camberwell  
medlar street london SE5 0JU  
Samuel Lewis Trust Estate 105 Warner Rd London  
14 Evesham Walk London SE5 8SJ  
18 Marianne Close London SE5 7FH  
20 Manson Mews London SW7 5AF  
160 Tooley Street London SE1  
160 Tooley Street London SE1  
160 Tooley Street London SE16  
160 Tooley Street London SE1  
160 Tooley Street London SE1  
14 Scott Court, 4 Broome Way 4 Broome Way Camberwell  
160 Tooley Street London SE1  
132 Kimberley Avenue London SE15 3XG  
542 Samuel Lewis Trust Estate, Warner Rd. London SE5 9NB  
Flat 1 Sycamore Court 58 Valmar Road London  
12 Valmar Road London SE5 9NG  
160 Tooley Street London SE1  
160 Tooley Street London Southwark  
Flat 5 14-16 Denmark Hill London  
18c Valmar Road London SE5 9NG

**APPENDIX 3****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.

<b>Applicant</b>	Respublica Limited	<b>Reg. Number</b>	19/AP/0864
<b>Application Type Recommendation</b>	Major application <b>Grant Planning Permission with Legal Agreement and Conditions</b>	<b>Case Number</b>	2058-4

**Draft of Decision Notice****Planning Permission was GRANTED for the following development:**

Redevelopment of the site to include the demolition of the existing buildings and construction of three buildings of: 7 storeys (plus single storey basement), 6 storeys and 4 storeys across the site providing employment space with ancillary screening room and gallery space (Use Class B1), 127 hotel rooms (Use Class C1), 43 residential units (Use Class C3) and a café (Class A3); together with associated landscaping works and provision of refuse storage, cycle parking, disabled car parking and amenity space.

At Valmar Trading Estate Valmar Road London SE5 9NW

**Permission is subject to the following Approved Plans Condition:**

1. The development shall be carried out in accordance with the following approved plans:

Reference no./Plan or document name/Rev.

Received on:

RP07 Plans - Proposed	
GA_SP_B00 Plans - Proposed (Rev: REV 2)	18.03.2019
GA_SP_L00-LOO.5 Plans - Proposed (Rev: REV 8)	18.03.2019
GA_SP_L01 Plans - Proposed (Rev: REV 2)	18.03.2019
GA_SP_L02 Plans - Proposed (Rev: REV 3)	18.03.2019
GA_SP_L03 Plans - Proposed (Rev: REV 3)	18.03.2019
GA_SP_L04 Plans - Proposed (Rev: REV 2)	18.03.2019
GA_SP_L05 Plans - Proposed (Rev: REV 2)	18.03.2019
GA_SP_L06 Plans - Proposed (Rev: REV 1)	18.03.2019
GA_SP_RL Plans - Proposed (Rev: REV 2)	18.03.2019
GA_SPC Plans - Proposed (Rev: REV 7)	18.03.2019
EL_CT-01 Plans - Proposed (Rev: REV 2)	18.03.2019
EL_CT-02 Plans - Proposed (Rev: REV 2)	18.03.2019
EL_CT-03 Plans - Proposed (Rev: REV 2)	18.03.2019
GA_CS_1 Plans - Proposed (Rev: REV 2)	18.03.2019
GA_CS_2 Plans - Proposed (Rev: REV 2)	18.03.2019
GA_CS_3 Plans - Proposed (Rev: REV 3)	18.03.2019
GA_CS_6 Plans - Proposed (Rev: REV 5)	18.03.2019
GA_CS_10 Plans - Proposed (Rev: REV 2)	18.03.2019
GA_CS_12 Plans - Proposed (Rev: REV 2)	18.03.2019
GA_CS_13 Plans - Proposed (Rev: REV 2)	18.03.2019
GA_CS_14 Plans - Proposed (Rev: REV 2)	18.03.2019

GA_P_L00_BA Plans - Proposed (Rev: REV 2)	18.03.2019
GA_P_LMEZZ_BA Plans - Proposed (Rev: REV 2)	18.03.2019
GA_P_L01_BA Plans - Proposed (Rev: REV 2)	18.03.2019
GA_P_LO2_BA Plans - Proposed (Rev: REV 3)	18.03.2019
GA_P_L03_BA Plans - Proposed (Rev: REV 3)	18.03.2019
GA_P_LO4_BA Plans - Proposed (Rev: REV 4)	18.03.2019
GA_P_RF_BA Plans - Proposed (Rev: REV 2)	18.03.2019
S_AA_BB_BA Plans - Proposed (Rev: REV 2)	18.03.2019
EL_A_BA Plans - Proposed (Rev: REV 3)	18.03.2019
GA_P_L00_BB Plans - Proposed (Rev: REV 3)	18.03.2019
GA_P_L01_BB Plans - Proposed (Rev: REV 2)	18.03.2019
GA_P_L_02_BB Plans - Proposed (Rev: REV 2)	18.03.2019
GA_P_L_03_BB Plans - Proposed (Rev: REV 2)	18.03.2019
GA_P_RF_BB Plans - Proposed (Rev: REV 2)	18.03.2019
S_A_B_BB Plans - Proposed (Rev: REV 2)	18.03.2019
E_B_BB Plans - Proposed (Rev: REV 3)	18.03.2019
GA_P_B00_MB Plans - Proposed (Rev: REV 4)	18.03.2019
GA_P_L0.05_MB Plans - Proposed (Rev: REV 4)	18.03.2019
GA_P_L00_MB Plans - Proposed (Rev: REV 4)	18.03.2019
GA_P_L01_MB Plans - Proposed (Rev: REV 4)	18.03.2019
GA_P_L02_MB Plans - Proposed (Rev: REV 4)	18.03.2019
GA_P_L03_MB Plans - Proposed (Rev: REV 4)	18.03.2019
GA_P_L04_MB Plans - Proposed (Rev: REV 4)	18.03.2019
GA_P_L05_MB Plans - Proposed (Rev: REV 4)	18.03.2019
GA_P_L06_MB Plans - Proposed	18.03.2019
GA_P_RF_MB Plans - Proposed (Rev: REV 3)	18.03.2019
GA_S_AA_MB Plans - Proposed (Rev: REV 3)	18.03.2019
GA_SS_BB_MB Plans - Proposed (Rev: REV 3)	18.03.2019
GA_EL_5-8_MB Plans - Proposed (Rev: REV 5)	18.03.2019
GA_EL_5-9_MB Plans - Proposed (Rev: REV 4)	18.03.2019
GA_EL_6-8_MB Plans - Proposed (Rev: REV 5)	18.03.2019
001 Plans - Proposed (Rev: REV C)	18.03.2019
002 Plans - Proposed (Rev: REV B)	18.03.2019
003 Plans - Proposed (Rev: REV D)	18.03.2019
004 Plans - Proposed (Rev: REV B)	18.03.2019
006 Plans - Proposed	18.03.2019
007 Plans - Proposed	18.03.2019
RP05 Plans - Proposed	18.03.2019
RP06 Plans - Proposed (Rev: REV B)	18.03.2019

Reason:

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

**Permission is subject to the following Pre-Commencements Condition(s)**

**3. SURFACE WATER DRAINAGE**

- a) No works shall commence (excluding demolition) until full details of the proposed surface water drainage system incorporating Sustainable Drainage Systems (SuDS) have been submitted to and approved in writing by the Local Planning Authority, including detailed design, size and location of attenuation units, details of flow control measures, and supporting hydraulic calculations. Green roofs should be maximised across the site.



- b) The drainage strategy should achieve a reduction in surface water runoff rates as detailed in the 'SuDSmart Pro' feasibility report dated 13/03/2019 (ref: 71551R1) during the 1% Annual Exceedance Probability (AEP) event plus climate change allowance. The applicant must demonstrate that the site is safe in the event of blockage/failure of the system, including consideration of exceedance flows. The site drainage must be constructed in accordance with the approved details.
- c) Should ground infiltration be proposed, this should be supported by infiltration tests conducted to BRE Digest 365 standards, in line with the CIRIA SuDS Manual C753 (25.3). To reflect realistic storm conditions, test pits should be filled with water three times and such tests should be conducted as close as possible to the location of proposed soakaways.

Reason:

To minimise the potential for the site to contribute to surface water flooding in accordance with Southwark's Strategic Flood Risk Assessment (2017) and Policy 5.13 of the London Plan (2016).

#### 4. WATERPROOFING OF BASEMENT

Prior to the commencement of development (excluding demolition), details of waterproofing measures to the basement in the Main Block to protect it from the potential ingress of ground water 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.

Reason:

To protect further occupiers of the building from the potential ingress of groundwater to the basement in accordance with Southwark's Strategic Flood Risk Assessment (2017) and Policy 5.12 of the London Plan (2016).

5. Prior to works commencing (excluding demolition), full details of 18 trees to be planted on the site shall be submitted to and approved in writing by the Local Planning Authority. This will include tree pit cross sections to ensure sustainable soil volumes, 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 the approved details in the first suitable planting season prior to first occupation of the development. Planting shall comply with BS5837: Trees in relation to demolition, design and construction (2012) and BS: 4428 Code of practice for general landscaping operations.

If within a period of five years from the date of the planting of any tree that tree, or any tree planted in replacement for it, is removed, uprooted or destroyed or dies, or becomes, in the opinion of the local planning authority, seriously damaged or defective, another tree of the same species and size as that originally planted shall be planted at the same place in the first suitable planting season., unless the local planning authority gives its written consent to any variation.

Reason: To ensure the proposed development will preserve and enhance the visual amenities of the locality and is designed for the maximum benefit of local

biodiversity, in addition to the attenuation of surface water runoff in accordance with The National Planning Policy Framework 2019 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."

6. No development shall take place, including any works of demolition, until a written construction environmental management plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall oblige the applicant, developer and contractors to commit to current best practice with regard to construction site management and to use all best endeavours to minimise off-site impacts, and will 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;

Site perimeter continuous automated noise, dust and vibration monitoring;

Engineering measures to eliminate or mitigate identified environmental impacts e.g. hoarding height and density, acoustic screening, sound insulation, dust control measures, emission reduction measures, location of specific activities on site, etc.;

Arrangements for a direct and responsive site management contact for nearby occupiers during demolition and/or construction (signage on hoardings, newsletters, residents liaison meetings, etc.)

A commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme; Site traffic - Routing of in-bound and outbound site traffic, one-way site traffic arrangements on site, location of lay off areas, etc.;

Site waste Management - Accurate waste stream identification, separation, storage, registered waste carriers for transportation and disposal at appropriate destinations.

To follow current best construction practice, including the following:-

Southwark Council's Technical Guide for Demolition & Construction at <http://www.southwark.gov.uk/construction>

S61 of Control of Pollution Act 1974,

The London Mayors Supplementary Planning Guidance 'The Control of Dust and Emissions During Construction and Demolition',

The Institute of Air Quality Management's 'Guidance on the Assessment of Dust from Demolition and Construction' and 'Guidance on Air Quality Monitoring in the Vicinity of Demolition and Construction Sites',

BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites',

BS 7385-2:1993 Evaluation and measurement for vibration in buildings. Guide to

damage levels from ground-borne vibration,  
BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings -  
vibration sources other than blasting,

Relevant EURO emission standards to comply with Non-Road Mobile Machinery  
(Emission of Gaseous and Particulate Pollutants) Regulations 1999 as amended &  
NRMM London emission standards <http://nrmm.london/>

Relevant CIRIA and BRE practice notes.

All demolition and construction work shall be undertaken in strict accordance with  
the approved CEMP and other 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 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 (2012).

### 7. ARCHAEOLOGICAL FOUNDATION DESIGN

Before any work hereby authorised begins (excluding demolition down to ground  
level), 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: the National Planning Policy  
Framework 2019; Strategic Policy 12 (Design and Conservation) of the Core  
Strategy 2011, and; Saved Policy 3.19 (Archaeology) of the Southwark Plan 2007.

### 8. ARCHAEOLOGICAL EVALUATION

Before any work hereby authorised begins (excluding demolition), the applicant  
shall secure the implementation of a programme of archaeological evaluation  
works in accordance with a written scheme of investigation, which shall first 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: the National Planning Policy Framework 2019;  
Strategic Policy 12 (Design and Conservation) of The Core Strategy 2011, and;  
Saved Policy 3.19 (Archaeology) of the Southwark Plan 2007.

9. PROGRAMME OF ARCHAEOLOGICAL MITIGATION

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

Reason:

In order that the details of the programme of works for the archaeological mitigation are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site, in accordance with: the National Planning Policy Framework 2019; Strategic Policy 12 (Design and Conservation) of the Core Strategy 2011, and; Saved Policy 3.19 (Archaeology) of the Southwark Plan 2007.

10. ASBESTOS SURVEY

Prior to the commencement of any demolition works an Asbestos Survey must be submitted to and approved in writing by the Local Planning Authority. This must either demonstrate with evidence that the existing buildings were built post 2000, or must include details of an intrusive asbestos survey in accordance with HSG264, supported by an appropriate mitigation scheme to control risks to future occupiers. The scheme must identify potential sources of asbestos contamination and detail removal or mitigation appropriate to the proposed end use. The development must be carried out in accordance with the details thereby approved.

Reason: To ensure that risks from potential asbestos are appropriately managed, 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 2019.

**Permission is subject to the following Grade Condition(s)**

11. CYCLE STORAGE DETAILS

Before any above grade work hereby authorised begins, details (1:50 scale drawings) of the facilities to be provided for the secure and covered storage of cycles shall be submitted to and approved in writing by the Local Planning Authority. This must include 25% Sheffield stands for the residential cycle parking. 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 2019; Strategic Policy 2 (Sustainable Transport) of the Core Strategy 2011, and; Saved Policy 5.3 (Walking and Cycling) of the Southwark Plan 2007.

## 12. DETAILED DRAWINGS

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

- the facades;
- bay studies;
- the balconies;
- parapets; and
- typical 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.

## 13. SAMPLE MATERIALS/PANELS/BOARDS

Prior to above grade works commencing, material samples/sample-panels/sample-boards of all external facing materials including 1m x 1m sample panels of the brickwork 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 2019, 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.

## 14. SECURITY MEASURES

Before any above grade work hereby authorised begins, details of security measures shall be submitted and approved in writing by the Local Planning Authority.

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 2019; Strategic Policy 12 (Design and Conservation) of the Core Strategy 2011, and; Saved Policy 3.14 (Designing out crime) of the Southwark Plan 2007.

15. HARD AND SOFT LANDSCAPING

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

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

Reason:

So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2019; Strategic Policies 11 (Open Spaces and Wildlife), 12 (Design and conservation) and 13 (High Environmental Standards) of The Core Strategy 2011, and; Saved Policies 3.2 (Protection of Amenity), 3.12 (Quality in Design) 3.13 (Urban Design) and 3.28 (Biodiversity) of the Southwark Plan 2007.

16. PROVISION / FIT OUT OF B1C SPACE

- a) The employment space hereby permitted shall include a minimum of 1,291.4sqm of B1c light industrial floorspace comprising artist studios and maker space in accordance with the application details.
- b) Before any work above grade hereby authorised begins (excluding demolition), full particulars shall be submitted to and approved in writing by the Local Planning Authority of a scheme showing that the parts of the employment floorspace to be used for B1c light industrial purposes will be fitted-out to an appropriate level for B1c light industrial use. The particulars referred to in the preceding sentence shall include details of the mechanical and electrical fit-out of the units, heating and cooling provision, sprinklers, and the provision of kitchen and toilet facilities. The facilities shall be provided in accordance with the approved details.

Reason: In granting this permission the Local Planning Authority has had regard to the special circumstances of this case in accordance with strategic policy 10 'Jobs and businesses' of the Core Strategy (2011) and the National Planning Policy

Framework 2019.

## 17. GREEN ROOFS FOR BIODIVERSITY

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

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

The biodiversity green 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 roofs shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.

Reason:

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

## 18. Details of Swift nesting bricks shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of above grade works.

No less than 24 nesting 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 Swift 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: 7.19 of the London Plan 2016, Policy 3.28 of the Southwark Plan and Strategic Policy 11 of the Southwark Core strategy.

**Permission is subject to the following Pre-Occupation Condition(s)**

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

**Reason:**

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

20. **OBSURE GLAZING TO BE PROVIDED**

Prior to the first use of the Main Block, a scheme detailing obscure glazing, privacy louvres or other privacy devices to the top floor roof terrace and windows (if required) which would have views towards properties on Denmark Hill 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 and maintained as such thereafter.

**Reason:**

In order to protect the privacy and amenity of the occupiers and users of the adjoining premises from undue overlooking in accordance with: the National Planning Policy Framework 2019; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan 2007.

21. **SCREENING TO RESIDENTIAL ROOF TERRACE**

Prior to the occupation of the 4-bedroom dwelling within Block B identified on the approved plans as plot BB1, details of a 1.7m high privacy screen to the rear roof terrace of this dwelling 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 and shall be provided prior to the occupation of the development and retained as such thereafter.

**Reason:** To ensure that there would be no unacceptable loss of privacy to the rear of properties on Valmar Road, 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).



22. BREEAM REPORT AND POST CONSTRUCTION REVIEW

- (a) 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;
- (b) 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 2019, 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.

23. ACOUSTIC REPORT FOR PLANT NOISE

Prior to the commencement of the authorised use, an acoustic report detailing the rated noise level from any plant, together with any associated ducting (which shall be 10 dB(A) or more below the measured LA90 level at the nearest noise sensitive premises) shall be submitted to and approved in writing by the Local Planning Authority and the method of assessment is to be carried in accordance with BS4142:2017 'Rating industrial noise affecting mixed residential and industrial areas'.

The plant and equipment shall be installed and constructed in accordance with any such approval given and shall be permanently maintained thereafter and the development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance from plant and machinery, in accordance with: the National Planning Policy Framework 2019; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan 2007.

24. The five accessible car parking spaces shall be fitted with active electric vehicle charging points and shall be provided in accordance with the approved plans prior to the occupation of the development and retained as such thereafter. One of the spaces shall be for a car club space, one for the B class floorspace and three for the residential units.

Reason

To ensure that there would be an adequate level of parking to serve the

development, in accordance with saved policy 5.6 'Car parking' and 5.7 'Parking Standards For Disabled People And The Mobility Impaired' of the Soutwark Plan (2007).

25. Full details of the proposed play areas including details of the equipment to be installed and means of enclosure shall be submitted to and approved in writing by the Local Planning Authority. The play areas 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,, London Plan (2016) Policy 3.6 Children and young people's play and informal recreation facilities; SP12 Design and conservation of The Core Strategy 2011 and the following Saved Policies of The Soutwark 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.

26. TRAVEL PLAN AND DETAILED TRANSPORT METHODS SURVEY

- a) The development shall be carried out in accordance with the Residential and Workplace travel plans dated 13th March 2019 from the first occupation of the development.
- b) At the start of the second year of operation of the approved Travel Plan, a detailed survey showing the methods of transport used by all those users of the building to and from the site and how this compares with the proposed measures and any additional measures to be taken to encourage the use of public transport, walking and cycling to the site shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise in accordance with any such approval given.

Reason:

In order that the use of non-car based travel is encouraged in accordance with: the National Planning Policy Framework 2019, Strategic Policy 2 (Sustainable Transport) of The Core Strategy 2011, and; Saved Policies 5.2 (Transport Impacts), 5.3 (Walking and Cycling) and 5.6 (Car Parking) of the Soutwark Plan 2007.

27. PROVISION OF REFUSE STORAGE

Before the first occupation of a block hereby permitted, the refuse storage for that block shall be provided as detailed on the drawings hereby approved and shall be made available for use by the occupiers of that block.

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 2019; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policies 3.2 (Protection of Amenity) and 3.7 (Waste Reduction) of The Southwark Plan 2007

## 28. SHOWERING FACILITIES

The showering facilities shown on the approved plans shall be provided prior to the occupation of the employment floorspace within the Main Block and shall be maintained as such thereafter and made available to all people working within the development.

Reason:

In order to ensure that satisfactory facilities are provided and retained in order to encourage the use of non-car based travel, in accordance with: The National Planning Policy Framework 2019; Strategic Policy 2 (Sustainable Transport) of The Core Strategy 2011, and; Saved Policies 5.2 (Transport Impacts) and 5.3 (Walking and Cycling) of the Southwark Plan 2007.

## 29. VENTILATION DETAILS

Prior to the commencement of the cafe / restaurant use, full particulars and details of a scheme for the ventilation of the premises to an appropriate outlet level, including details of sound attenuation for any necessary plant and the standard of dilution expected, shall be submitted to and approved by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any approval given.

Reason

In order to ensure that 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 2019, Strategic Policy 13 - High Environmental Standards of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of The Southwark Plan 2007.

30. Prior to the first use of the development the existing gates across the access to the site from Valmar Road shall be removed, and the gates across the access into the site from Denmark Hill shall be fixed open and shall remain as such.

Reason:

To ensure that the site would remain open to the public and could not be closed off, in accordance with saved policy 5.3 'Walking and cycling' of the Southwark Plan (2007).

## 31. SERVICE MANAGEMENT PLAN

Before the first occupation of the non-residential uses hereby permitted, a detailed 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.

Reason:

To ensure compliance with: the National Planning Policy Framework 2019; Strategic Policy 2 (Sustainable Transport) of the Core Strategy 2011, and; Saved Policy 5.2 (Transport Impacts) of the Southwark Plan 2007.

**Permission is subject to the following Compliance Condition(s)**

**32. SERVICING HOURS / NO COACHES**

Any deliveries, unloading and loading to the non-residential uses shall only be between the following hours:

9am to 3pm and 4pm-8pm Mondays to Fridays;  
8am to 8pm on Saturdays.

No servicing of the non-residential uses shall take place on Sundays and Bank Holidays and no coaches shall be permitted to enter the site at any time, including smaller 10.5m coaches.

Reason

To ensure that and occupiers of the development and occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance in accordance with The National Planning Policy Framework 2019, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity of The Southwark Plan 2007

**33. ROOF TO BE USED ONLY IN EMERGENCY**

The flat roof of the Main Block at mezzanine level shall not be used other than as a means of escape and shall not be used for any other purpose including use as a roof terrace or balcony or for the purpose of sitting out.

Reason

In order that the privacy of neighbouring properties may be protected from overlooking from use of the roof area in accordance with The National Planning Policy Framework 2019, Strategic Policy 13 High environmental standards of The Core Strategy 2011 and Saved Policy 3.2 'Protection of Amenity' of the Southwark Plan 2007.

**34. INTERNAL NOISE LEVELS RESTRICTION**

The dwellings hereby permitted shall be designed to ensure that the following internal noise levels are not exceeded due to environmental noise:

Bedrooms - 30dB LAeq, T\* and 45dB LAFmax

Living rooms - 30dB 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 2019.

### 35. RESTRICTION ON THE INSTALLATION OF TELECOMMUNICATIONS EQUIPMENT

Notwithstanding the provisions of Parts 24 and 25 The Town & Country Planning [General Permitted Development] Order 1995 [as amended or re-enacted] no external telecommunications equipment or structures shall be placed on the roof or any other part of 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 2019; 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.

### 36. HOURS OF USE

a) The cafe / restaurant use hereby permitted shall only open between the hours of 7am to 11pm daily. Outside seating for the cafe / restaurant shall only open between 8am and 9.30pm daily.

b) The open plan co-working space, ancillary facilities within the basement of the Main Block and workspace on the top floor of the Main Block shall be permitted to open to members of the public and hotel guests during the following hours:

Monday to Friday - 7am to 10am and 5pm to 11pm

Saturdays, Sundays and Bank Holidays - 7am to 11pm

c) The roof terrace on the top floor of the Main Block shall only be permitted to open between the hours of 8am and 10pm daily.

Reason:

To safeguard the amenities of neighbouring residential properties and to maximise the use of the employment space, in accordance with The National Planning Policy Framework 2019, Strategic Policy 10 'Jobs and Businesses and 13 High environmental standards of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of The Southwark Plan 2007.

37. Other than those shown on the approved plans, no further windows shall be inserted in the elevation of the Main Block facing the rear of properties on Denmark Hill without the express consent in writing from the Local Planning Authority, to whom a planning application must be made.

Reason:

Additional windows facing the rear of the properties in Denmark Hill could result in unacceptable overlooking of these properties, which would be contrary to saved policy 3.2 'Protection of amenity' of the Southwark Plan (2007) and strategic policy 13' High environmental standards' of the Core Strategy (2011).

38. A minimum of 10% of the hotel bedrooms hereby approved shall be wheelchair accessible and shall be retained as such hereafter.

Reason:

As required by policy 4.5 of the London Plan (2016).

39. ACCESSIBLE AND WHEELCHAIR DWELLINGS

Of the residential units hereby permitted, 90% shall meet Building Regulation standard M4 (2) and 10% shall meet Building Regulation standard M4 (3) in accordance with the approved plans.

Reason:

To ensure the development complies with: the National Planning Policy Framework 2019; Policy 3.8 (Housing Choice) of the London Plan 2016, and; Strategic Policy 5 (Providing New Homes) of the Southwark Core Strategy 2011.

**Permission is subject to the following Special Condition(s)**

40. UNEXPECTED CONTAMINATION

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority 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. The Council and Environment Agency 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) 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 2019.

#### 41. PROTECTION OF GROUND WATERS

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: To protect the underlying groundwater from the risk of pollution. Infiltrating water has the potential to cause remobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of groundwater.

#### 42. NO PILING

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: The developer should be aware of the potential risks associated with the use of piling where contamination is an issue. Piling or other penetrative methods of foundation design on contaminated sites can potentially result in unacceptable risks to underlying groundwaters. We recommend that where soil contamination is present, a risk assessment is carried out in accordance with our guidance 'Piling into Contaminated Sites'. We will not permit piling activities on parts of a site where an unacceptable risk is posed to controlled waters.

#### 43. LIGHTING

Details of any external lighting [including design, power and position of luminaries] to the buildings and external areas surrounding the buildings which shall comply with the Institution of Lighting Professionals guidance shall be submitted to and approved by the Local Planning Authority in writing before any such lighting is installed. The development shall not be carried out otherwise in accordance with any such approval given.

##### Reason

In order that the Council may be satisfied as to the details of the development in the interest of the visual amenity of the area, the safety and security of persons using the area and the amenity and privacy of adjoining occupiers in accordance with The National Planning Policy Framework 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.

"

44. ARCHAEOLOGY SITE REPORTING

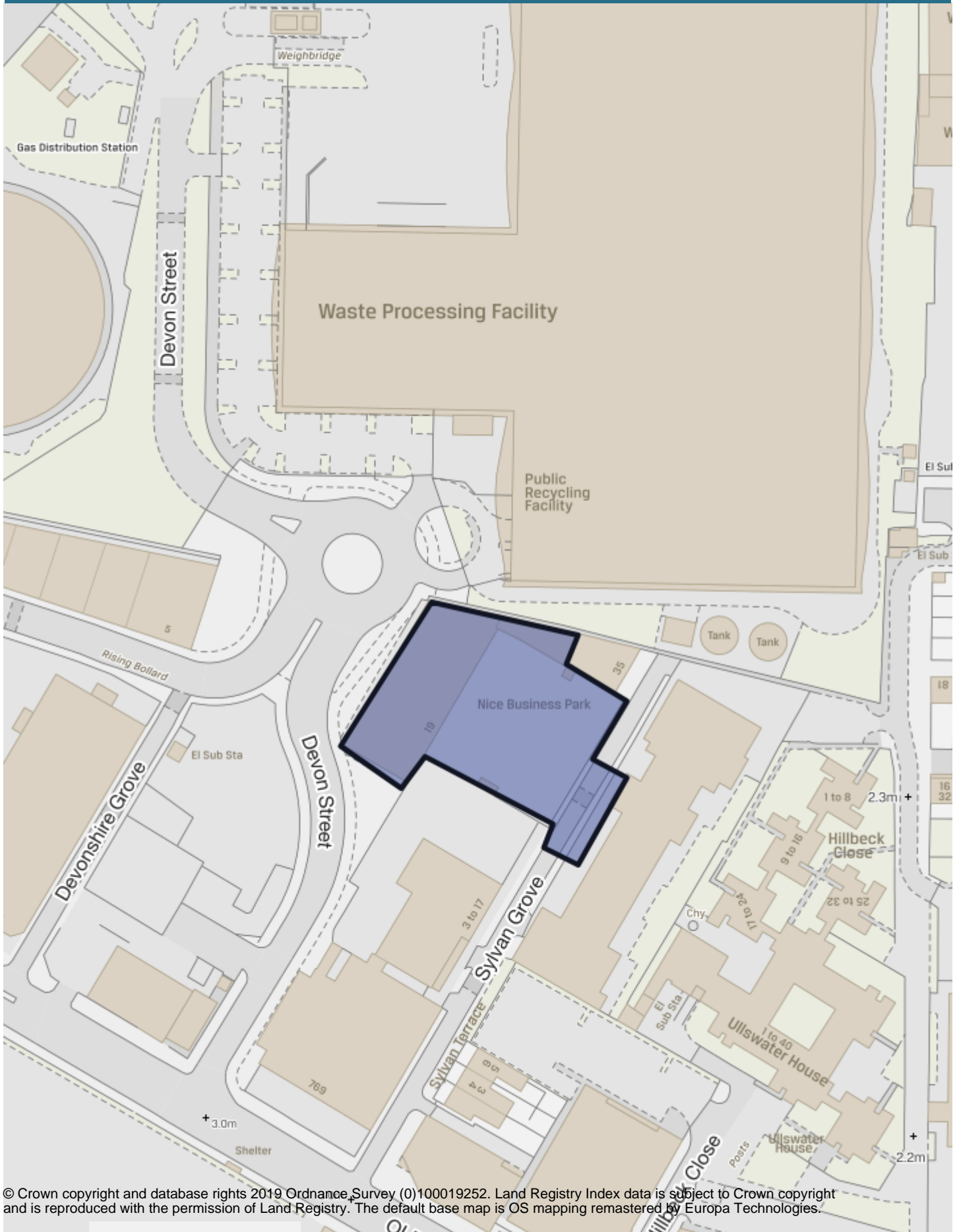
Within six months of the completion of archaeological site works, an assessment report detailing the proposals for post-excavation works, publication of the site and preparation of the archive shall be submitted to and approved in writing by the Local Planning Authority and that the works detailed in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

Reason

In order that the archaeological interests of the site are secured with regard to the details of the post-excavation works, publication and archiving to ensure the preservation of archaeological remains by record in accordance with Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and the National Planning Policy Framework 2019."

Signed: **Simon Bevan** Director of Planning





© Crown copyright and database rights 2019 Ordnance Survey (0)100019252. Land Registry Index data is subject to Crown copyright and is reproduced with the permission of Land Registry. The default base map is OS mapping remastered by Europa Technologies.

## CONTENTS

RECOMMENDATIONS.....	4
EXECUTIVE SUMMARY .....	5
BACKGROUND INFORMATION.....	11
Site location and description .....	11
Details of proposal.....	15
Planning history .....	23
Planning history of adjoining sites.....	24
SUMMARY OF CONSULTATION RESPONSES .....	26
Public consultation.....	26
KEY ISSUES FOR CONSIDERATION.....	36
Summary of main issues .....	36
Legal context.....	36
Adopted planning policy .....	37
Emerging planning policy.....	40
Principle in terms of land use, including consideration of emerging policy for the Old Kent Road Opportunity Area.....	41
Provision of a new public open space.....	44
Conclusion on land use .....	45
Environmental impact assessment.....	45
Provision of Housing and Affordable housing.....	46
Housing Mix.....	47
Density .....	49
Quality of accommodation .....	52
Amenity space and playspace .....	55
Children's play space.....	57
Public Open Space.....	59
Impact of proposed development on amenity of adjoining occupiers and surrounding area .....	65
Impact of the proposed uses .....	65
Daylight and Sunlight impact to existing residential units.....	66
Transport issues .....	73

Accessibility and trip generation .....	74
Car parking.....	74
Servicing .....	74
Public Transport .....	75
Walking and public realm.....	76
Cycle parking.....	76
Construction management.....	77
Design issues .....	78
Site layout .....	80
Height, Scale and Massing and consideration of tall buildings.....	81
Architectural Design and Materiality .....	84
Design Review Panel .....	86
Townscape and Visual Impact Analysis (TVIA).....	88
Heritage and Townscape considerations.....	91
Impact on character and setting of a listed building and/or conservation area .....	91
Impact on trees and Landscaping .....	94
Planning obligations (S.106 undertaking or agreement) .....	95
Mayoral and Southwark Community Infrastructure Levy (CIL).....	98
Sustainable development implications .....	98
Overheating and Cooling.....	100
Ecology .....	101
Flood Risk and Water Resources .....	101
Archaeology.....	102
Environmental considerations .....	102
Contaminated Land .....	102
Hazardous Sites.....	102
Air Quality.....	103
Wind and Microclimate .....	103
Aviation .....	104
Telecommunications and Electronic Interference .....	104
Conclusion on planning issues.....	104
Consultations .....	105
Consultation replies.....	105

Community impact statement / Equalities Assessment ..... 106  
Human rights implications ..... 108

<b>Item No.</b> 6.2	<b>Classification:</b> Open	<b>Date:</b> 8 September 2020	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>	<b>Development Management planning application:</b> Application 19/AP/2307 for: Full Planning Application  <b>Address:</b> Daisy Business Park, 19-35 Sylvan Grove, London SE15 1PD  <b>Proposal:</b> Redevelopment to provide a mixed use development comprising up to 219 residential dwellings (Use Class C3) and up to 2,986sqm (GIA) commercial workspace (Use Class B1) within two buildings of 5 storeys and 32 storeys with associated car and cycle parking, landscaping, and public realm and highways improvements.		
<b>Ward(s) or groups affected:</b>	Old Kent Road		
<b>From:</b>	Director of Planning		
<b>Application Start Date</b> 31/07/2019		<b>Application Expiry Date</b> 30/10/2020	
<b>Earliest Decision Date</b> 15/02/2020			

## RECOMMENDATIONS

- 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 8 February 2021;
  - Referral to the Mayor of London;
- That, in the event that the Section 106 Legal Agreement is not completed by 8 February 2021, that the director of planning be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 311 of this report.

## EXECUTIVE SUMMARY

### Site



### Existing land use (paragraph 4-11)

B1 building comprising number of commercial units including offices, studio and light industrial space.

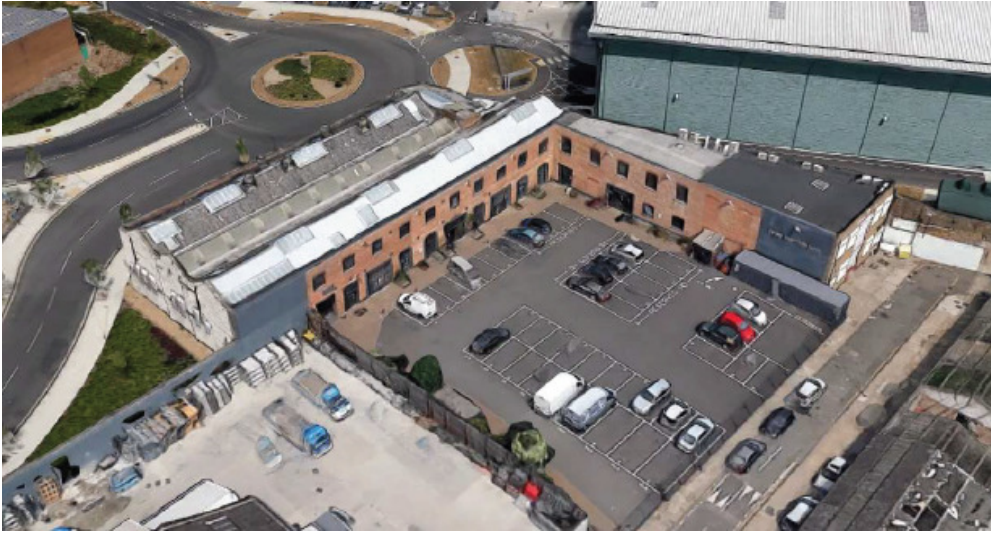
### Proposed Development (paragraph 12-23)



- 219 homes;
- Total of 2,986sqm (GIA) of flexible non-residential floorspace;
- 35.1% affordable (Total 59 homes, Social 25.4%, 9.7% intermediate);
- 10% affordable workspace;
- Play space requirements met on site;
- 700sqm of new public square;
- No car parking other than 6 No. wheelchair parking spaces;
- 380 cycle parking spaces and 36 visitor cycle parking spaces;
- 116 of 219 homes are dual aspect equating to 52% of the overall units;
- 61% of affordable housing units as dual aspect;
- Buildings of up to 5 and 32 storeys in height;
- Estimated Community Infrastructure Levy of circa £5.85m before relief.



Current site



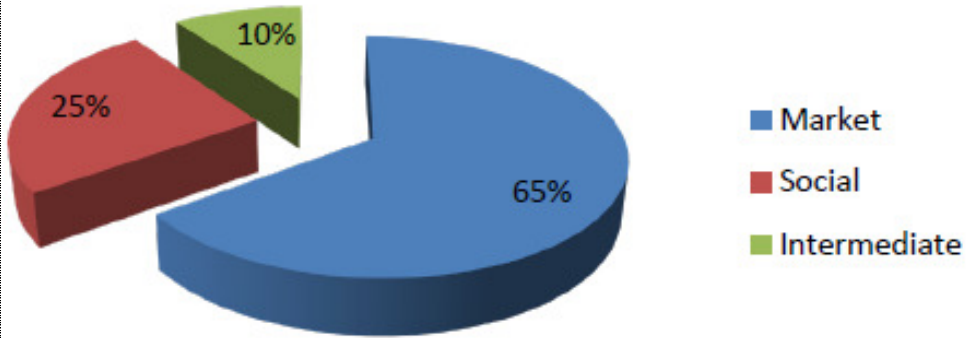
Proposed site



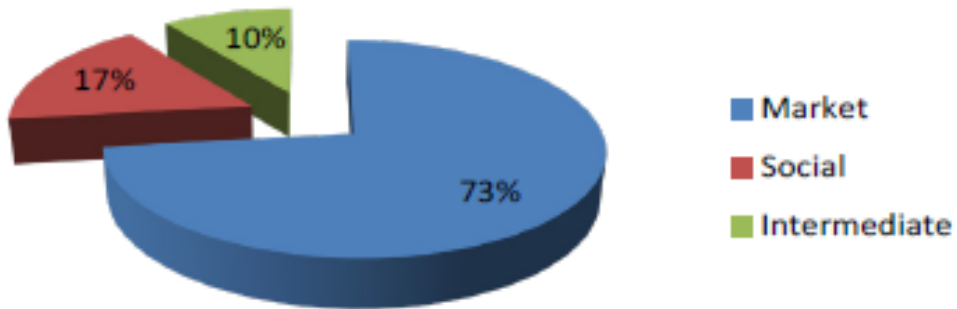


**Affordable housing (Paragraphs 124-134 )**

Habitable rooms by tenure



Tenure by unit numbers



**Residential Design – Dual Aspect (Paragraphs 157-158):**

Dual aspect figures

	Dual aspect affordable homes	Dual aspect private homes	Dual aspect total homes
TOTAL	61%	50%	116 of 219 (52%)

### Open spaces (Paragraphs 159-178)



Table: Amenity space proposed against policy requirement

	<b>Policy requirement</b>	<b>Proposal</b>	<b>Difference</b>
<b>Private</b>	2,190sqm	1,404sqm (not including those that exceed 10sqm)	-786sqm
<b>Communal</b>	50sqm + shortfall 786sqm of private amenity space (total 836 sqm)	363sqm	-473sqm
<b>Dedicated children's play space</b>	740sqm required by the June 2019 GLA calculator	740sqm	0sqm

<p><b>Public open space</b></p>	<p>None is proposed on site in the draft 2017 AAP masterplan with site being shown as an infill development. The scheme would therefore have been expected to make an off site financial contribution to public open space in the vicinity equivalent to 1,095sqm</p>	<p>The approach to the revised AAP masterplan has changed in response to public consultation to require a new public open space to be created on site off Sylvan Grove. This would be co joined with a new public space on the adjacent Devonshire Square development. This scheme would contribute 700sqm to that new public space.</p>	<p>This scheme would still be required to make an off site in lieu financial contribution equivalent to 395sqm</p>
---------------------------------	---	--	--

### **Sustainability (Paragraphs 324-339 )**

#### **Energy**

- Photovoltaic (PV) panels and air source heat pump (ASPH) are proposed on-site.
- The proposed development would be designed so that it can be connected SELCHP District wide heating network that is currently being developed by the GLA and Veolia. This future connection would further reduce CO2 emissions;
- Residential areas would achieve a 70% carbon reduction and non residential areas would achieve a 61% reduction;
- A carbon offset payment of £116,180 has been agreed within the S106 agreement.

#### **Car and cycle parking (Paragraphs 229-250)**

- No car parking other than 6 No. wheelchair parking spaces;
- 380 cycle parking spaces and 36 visitor cycle parking spaces;

Old Kent Road frontage



## **BACKGROUND INFORMATION**

### **Site location and description**

3. The site comprises an area of 0.29 hectares (ha) and accommodates an L-shaped two storey building abutting the western and northern boundaries. At the eastern end of the northern wing, the former industrial building is now providing a church, but is not part of the application site. The only access to the site at present is via Sylvan Grove through vehicular and pedestrian gates. The courtyard of the site is laid out in a parking court with 47 parking spaces.

It lies within the following adopted Southwark Plan designations;

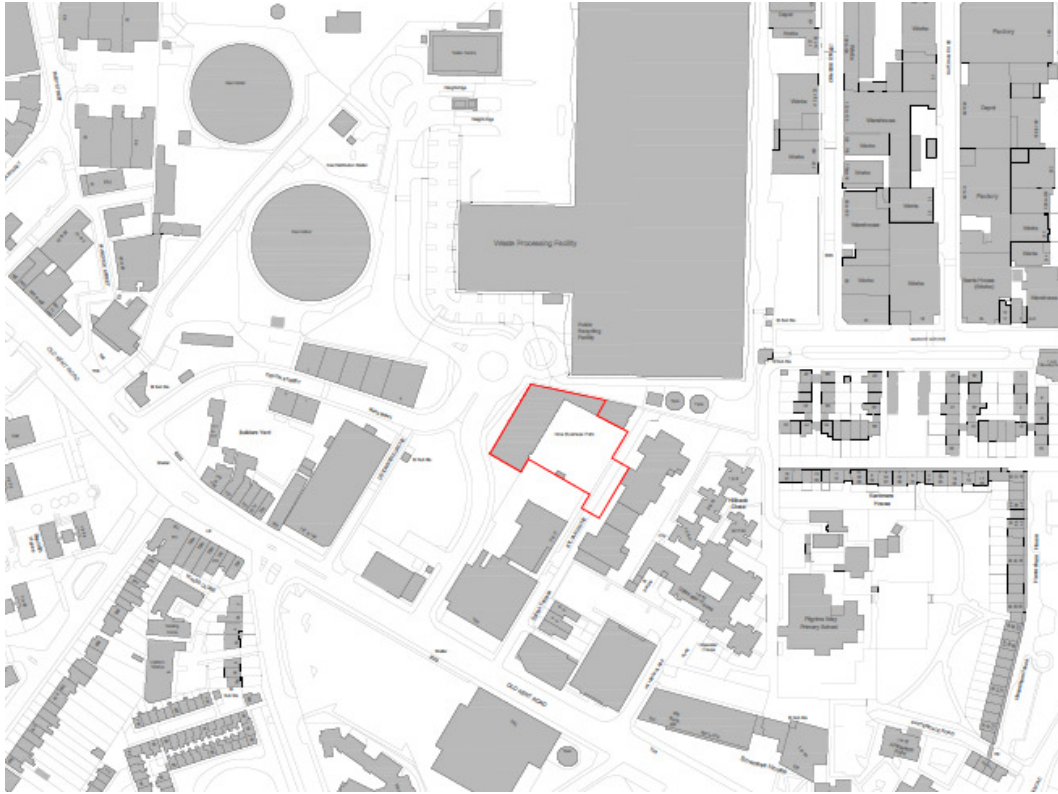
- Old Kent Road Strategic Industrial Location (SIL);
- Old Kent Road Action Area (Core Area);
- Urban Density Zone;
- Bermondsey Lake and Old Kent Road Archaeological Priority Zones;
- Air Quality Management Area

The site also lies within the Old Kent Road Opportunity Area (OKROA) and is discussed further below.

4. It should be noted that in the emerging New Southwark Plan (NSP), the site is no longer protected as SIL. The maps propose the release of the site from the SIL to

allow for the provision of new homes mixed with commercial uses.

**Images: Application site and site boundary**



5. The site comprises a B1 building of approximately 1,958sqm of gross internal area (GIA). It comprises a number of commercial units including offices, studio and light industrial space.
6. The site falls within a mixed industrial and residential area. Existing residential uses is mainly to the east of the site on Sylvan Grove which comprise a recent block at 8-24 Sylvan Grove for 80 residential flats.
7. It is important to note that the site sits adjacent to a redevelopment site located immediately to the south, which would be called the 'Devonshire Square' scheme here in this report (full address: 747-759 & 765-775 Old Kent Road, and land at Devonshire Grove). The site is subject to a hybrid planning application (ref 19/AP/1239) for up to 565 homes, up to 4,770sqm total floorspace for a range of employment, retail, leisure and community uses. This went to planning committee on 1<sup>st</sup> June 2020 with a resolution to grant. That Devonshire Square development site would adjoin the current application site on the southern and western boundaries. There will be changes to the road network and layout and a new public open space is proposed that would adjoin the current application site.

**Image: Plan of proposed adjoining Devonshire Square development**

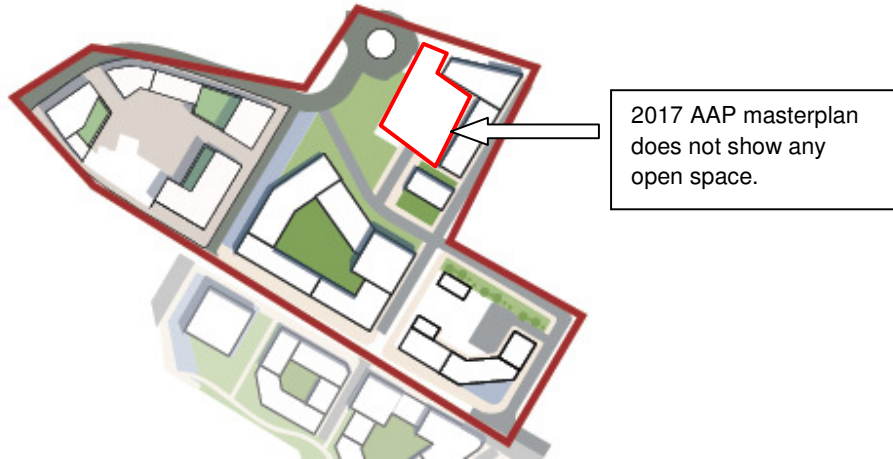


8. As such, with the Devonshire Square development completed the surrounding area will change in character and uses, with more residential development in line with the Old Kent Road Area Action Plan (OKRAAP).
9. The site is also within the Old Kent Road Opportunity Area (OKROA): Sub Area 4 – Hatcham, Ilderton and Old Kent Road (specifically OKR18). The site also falls within a Site Allocation (NSP66) 'Devon Street and Sylvan Grove' outlined in the emerging NSP.



Image: OKR18 in the draft AAP



**Image: Masterplan**

10. The site is not within a conservation area and the existing buildings are not listed. The western part of the existing building is identified in the further preferred draft of the OKR AAP as being of townscape merit. The listed Grade II Gasholder No. 13 (associated with the former South Metropolitan Gas Company) is located to the east of the site.
11. The site has an official PTAL rating of 3 (medium accessibility) and is also within Flood Zone 3. The site would be within 200m of the proposed new BLE station on Old Kent Road

**Details of proposal**

12. Full planning permission is sought for the demolition of the existing building on the site and construction of a mixed use development comprising residential and commercial uses in two blocks. 219 new dwellings are proposed, 35.1% of which would be affordable (when calculated by habitable rooms). This is provided within a total of 59 affordable dwellings. This affordable housing would be made up of a policy compliant offer of social and intermediate units. Overall, 25.4% of the habitable rooms would be for social rent and 9.7% would be of intermediate tenure. The tables below sets out the proposed housing mix and tenure by split habitable rooms and by unit numbers.

**Table: The mix of dwellings across the site as a whole**

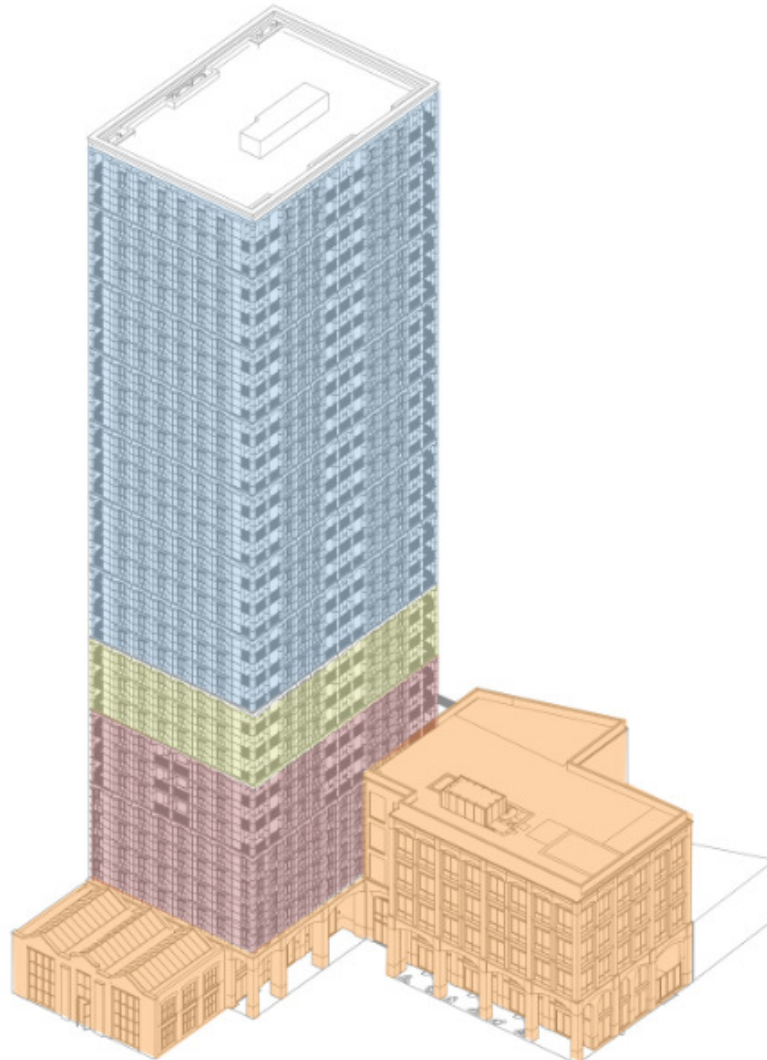
Unit type	Number of units	Percentage (%)
Studio	11	5
1 bedroom unit	89	40.6
2 bedroom unit	89	40.6
3 bedroom unit	30	13.7
<b>Total</b>	<b>219</b>	<b>100</b>



**Table: Proposed housing mix and tenure by habitable rooms**

<b>Unit type</b>	<b>Private/market units</b>	<b>Social Rented units</b>	<b>Intermediate units</b>
Studio	11	0	0
1 bed	60	11	9
2 bed	80	0	9
3 bed	0	27	3
<b>Total</b>	<b>160</b>	<b>38</b>	<b>21</b>

**Image: Tenure split and allocation within the building**



---

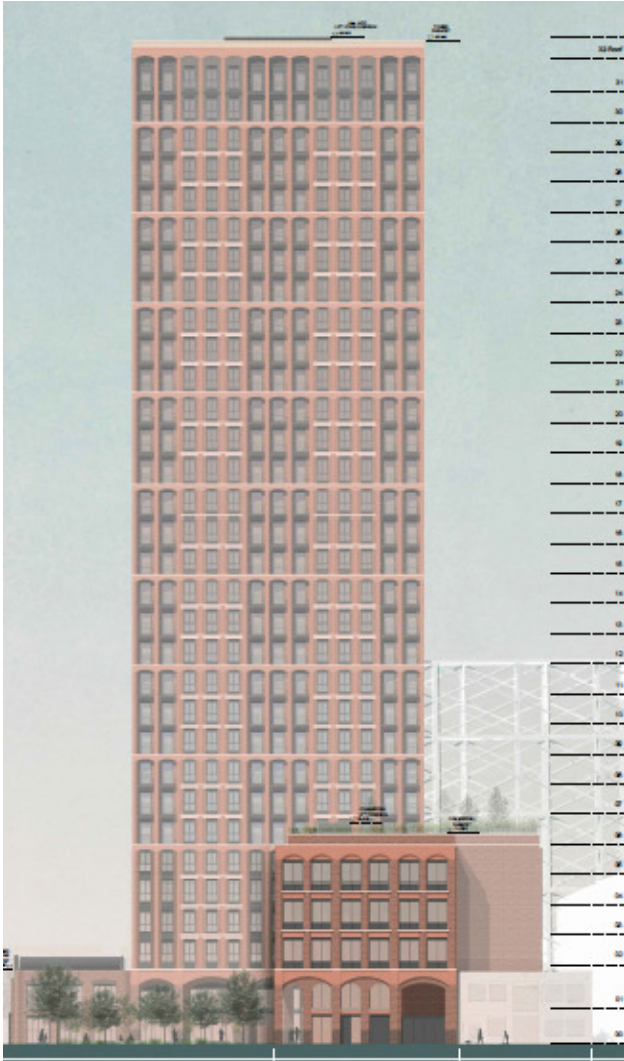
	Private Sale Apartments.
	Shared Ownership Apartments.
	Social Rent Apartments.
	Commercial Accommodation

13. The scheme is tenure blind and amended plans have been received to create a shared entrance and lobby for the private and affordable units. Each of the lifts in the single residential core will be accessible to all residents in the building, with fob access provided to the relevant floor and the communal amenity space on Level 5.

The above image shows the arrangement of the different tenures:

- Social rent units are located on the second to eighth floors;
  - Intermediate units on the 9<sup>th</sup> to 11<sup>th</sup> floors; and
  - Private units on the 12<sup>th</sup> to 31<sup>st</sup> floors.
14. The proposed development would also provide a total of 2,986sqm (GIA) of commercial (B1) floorspace and would be accommodated in the 5 storey block located on the northern boundary and on the lower two floors of the taller block. There would also be a proportion of affordable work space. More detail is provided on this in the assessment section of this report.
15. The ground floor would also comprise the following:
- Residential entrance and lobby access in the central part of the building;
  - Two Commercial entrances;
  - Ground floor communal amenity room;
  - Refuse store and UKPN substation; and
  - 6 No. wheelchair parking spaces accessed from Sylvan Grove in the north part of the building.
16. The proposals comprise a building with three main components. It would be a mix of 2, 5 and 32 storeys arranged on an L-shaped footprint. There would be a reconstructed section of the existing building to form a 2 storey commercial wing to the southwest portion of the site This steps up to the taller block of 32 storeys running along the western boundary. The 5 storey block runs perpendicular to this along the northern boundary. The 32 storey element would be a maximum of up to 107.8m AOD (105.3m above ground level) and the shorter element up to 25.6m AOD (23.1m above ground level).

Image: Proposed height and massing – Sylvan Grove elevation



**Image: Proposed height and massing – West elevation**



**Image: 3D image of proposed development in the surrounding context**



17. Private amenity space is provided in the form of balconies to each flat. Winter garden enclosures have been added to the lower levels (levels 2-5) of the residential building and the elevations have been updated to reflect this amendment. Communal garden space is provided on the roof of the lower block building and is accessible to all tenures. In addition, an internalised communal room is proposed on the ground floor.
18. As explained above, this proposed development would provide public open space in the form of a 'garden square' on the ground floor level and this would 'complete' the rest of the public open space proposed in the adjoining Devonshire Square development. This accessible public space is proposed to the front and the L-shaped building wrapping around this space and totals 700sqm within this site. The Devonshire Square space adjacent comprises 369sqm. The total size of the space would be 1,069sqm. (This has been described as 'Sylvan Gardens' in the Devonshire Square submission documents and the term 'Garden Square' will be similarly used here in this report). The combined space is shown below. The space would be designed to a unified plan secured by condition and legal agreement.

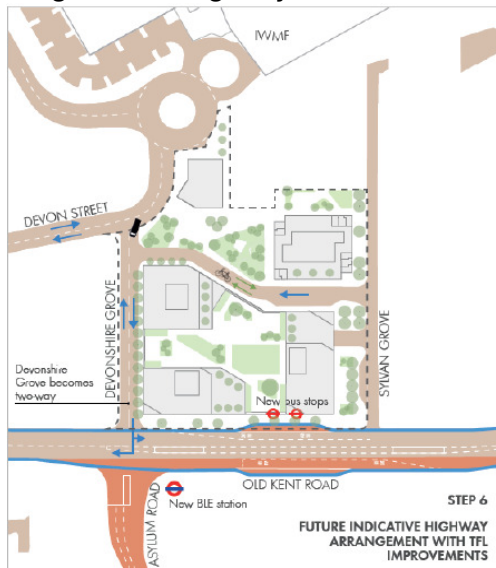
**Image: Proposed public open space/square (in colour) and the adjoining square in the Devonshire Square development (shaded grey)**



19. It is important to note that there would be extensive works to the existing road network in the Devonshire Square development. This includes the stopping up of the existing IWMF egress road and the widening and re-alignment of Devonshire Grove to accommodate two-way traffic to provide access and egress to the IWMF. The application proposed here on Daisy Business Park would be unaffected, but it is important to highlight the future highway context.



**Image: Future highway network**



20. The proposed development would be car free, with the exception of 6 car parking spaces for disabled residents and are located within a secured parking garage to the northern part of the scheme accessed from Sylvan Grove. The development will be serviced from within the on-site servicing yard. The scheme now provides a total of 380 cycle spaces for the residential use and 42 cycle spaces for the commercial use accommodated within the development at first floor level and accessible via a cycle lift. Residential long- stay provision and commercial long-stay provision will be housed in separate rooms. 36 short stay cycle parking will all be provided in the form of Sheffield stands located within the public realm.
21. Pre-application discussions were held in relation to the proposal under consideration now under ref 16/EQ/0218. The main matters discussed were the height of the buildings and its orientation. No formal response was issued.

### **Planning history**

22. There have been a couple of planning permissions granted for an additional building on the site for industrial uses, but this was not implemented. There has not been any previous application made seeking to comprehensively redevelop the site. There has also not been any application seeking consent for residential uses.
23. An application to request for Environmental Impact Assessment (EIA) Screening Opinion was submitted (ref 19/AP/1117) for the redevelopment of the site to provide 186 homes and 4,799sqm commercial space in two buildings of up to 30 storeys. A verbal response was given confirming that the proposed development was not considered to constitute EIA development and is discussed in the relevant section of this report.



### Planning history of adjoining sites

24. The most recent and relevant history on adjoining sites is the adjoining Devonshire Square development at 747-759 & 765-775 Old Kent Road, and land at Devonshire Grove which is pending a decision:

Ref 19/AP/1239 Planning permission pending submitted 25.04.2019

(Detailed Proposals)

Full planning permission for the demolition of all existing structures on site, the stopping up of the existing Devonshire Grove major arm (IWMF egress road) and redevelopment to include formation of a new road reconfiguration and widening of Devonshire Grove, widening of the foot ways on Sylvan Grove and Old Kent Road, construction of Building A at ground plus 38 storeys (137.26m AOD) to provide 264 residential units (Class C3), flexible retail/employment floorspace (Class A1/A2/A3/A4/B1a-c), creation of a new public realm including new public squares and spaces, associated landscaping and highways works and a new substation and all associated works.

(Outline Proposals)

Outline planning permission (all matters reserved) for comprehensive mixed-use development for the following uses in four Buildings (B, C, D and E) up to a maximum height of 81.3m AOD, and a basement level shared with Building A: Up to a maximum of 301 residential units (Class C3); employment workspace floorspace (Class B1a-c); flexible retail, financial and professional services, food and drink uses (Class A1/A2/A3/A4/A5), flexible non-residential institutions (Class D1) and Assembly and leisure uses (Class D2); Storage, car and cycle parking; Energy centre; Substations; Formation of new pedestrian and vehicular access and means of access and circulation within the site together; and new private and communal open space.

25. A more recent residential development was granted at 8-24 Sylvan Grove, to the east of the site:

Ref 15/AP/1330 Parent permission with subsequent non-material minor amendments approved.

Application Type: FULL

Redevelopment of the site to construct a part two, part five, part six and part eight storey building comprising 80 residential units ( 23 x one bed, 41 x two bed and 16 x three bed) for both private and affordable tenures with associated car parking and landscaping.

Decision: Granted with legal agreement 21.10.2015

26. Ref 08/AP/2209 at 763 Old Kent Road for the Integrated Waste Management Facility (IWMF).

Application Type: FULL

Erection of an Integrated Waste Management Facility (incorporating mechanical

biological treatment plant and waste transfer station, material recycling facility and household waste re-use and recycling centre), 16.2m high to top of ridge (20.33m AOD), with ancillary infrastructure including a municipal depot, contract administration and visitor centre (Resource Centre) with associated landscaping, car parking and internal access road.

Decision: Granted with legal agreement 16.02.2010

27. A number of recent planning applications have been made within the Old Kent Road Action Area boundary close to the site, including the following:

28. Ref 17/AP/4649 Iberia House , 2 Hatcham Road

Application Type: Full

Demolition of existing light industrial building and construction of a building ranging in height from 2 to 9 storeys comprising 915.5sqm of B1 commercial and employment space at ground and first floor levels and 33 residential flats over the second to eight floor levels, with 3 residential parking spaces accessed from Hatcham Road

Decision: Pending decision after resolution to grant by Planning Committee in July 2019

29. Ref 17/AP/4819 Land At 313-349 Ilderton Road

Application Type: Full

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.

Decision: Pending decision after resolution to grant by Planning Committee in December 2018.

30. Ref 19/AP/1322 Aldi, 840 Old Kent Road

Application Type: Full

Demolition of existing building and redevelopment of the site to provide a new building of up to 13 and 21 storeys in height (maximum height 73.60m above ground level). Redevelopment to comprise 170 residential units (Class C3), a 1,778 sqm (GIA) retail unit (Class A1) and a 52 sqm (GIA) flexible retail unit (Class A1/A3), with associated landscaping, car parking, servicing, refuse and plant areas, and all ancillary or associated works.

Decision: Pending decision after resolution to grant by Planning Committee in February 2020.

## **SUMMARY OF CONSULTATION RESPONSES**

### Public consultation

31. At the time of writing, a total of:  
 3 objections have been received;  
 1 neutral representation has been received;  
 3 supporting comments have been received.
32. The main issues raised by the public **objecting** to the proposed development are:
- Dense tall towers that contain cramped flats and relating this to the housing estates back in the 1960's;
  - Ask that the development be a maximum of 6 storeys in height;
  - Question whether public electric vehicle charging points (EVCP) would be provided;
  - Existing vacant buildings could be restored for future businesses;
  - Questions the capacity for infrastructure such as drainage and parking given the community is a small area;
  - Lack of direct engagement with Veolia (IWMF) by the applicant;
  - The Design and Access Statement does not consider or commentate on the impact of the scheme on their operation;
  - Tall buildings can impact micro climate (wind) not only at a pedestrian level but also in terms of emission dispersion. There is no assessment work;
  - Noise impacts. The assessment does not take into account the potentially greater impact on those residents at higher level as a result of breakout from the roof, which in practice would be impossible to screen;
  - Traffic on the Old Kent Road itself would likely provide a significant cumulative noise source, especially at peak times;
  - The proposed residential development is directly adjacent of the IWMF with some dwellings and associated balconies facing the IWMF. While the IWMF has its own site environmental controls it is for applicants introducing a new use in the area to establish and provide sufficient evidence there will be no significant issues arising post development;
  - Cumulative impact is also pertinent. There is concern that the cumulative impacts of this development, combined with other development coming forward in the AAP area, have not been adequately considered. This includes issues of enclosure and tunnelling where a greater density of built development with sensitive receptors is proposed at a height where it is possible emissions cannot disperse.
33. Officer response:  
 The height and scale of the proposed development is discussed under the design section of this report and considers that the tall building would be acceptable. The request that the development be less than 6 storeys would not achieve the objectives and aspirations of the New Southwark Plan or the OKR AAP to provide more housing and mixed use development in this location. The surrounding area is

likely to change in character and scale. The neighbouring residential block at 8-24 Sylvan Grove is taller than 6 storeys in height. No publically available EVCP is proposed as Sylvan Grove have double yellow lines so there is limited parking for cars. Officers note that existing vacant buildings in the area could be restored for use, and part of the existing building on site is being retained and re-used, but considers that a more comprehensive approach including providing other uses such as housing could meet the housing and employment need of the borough and achieve the aspirations of the AAP. The proposed development has submitted a drainage strategy and no objections have been raised by the council's Flood and Drainage team.

34. The comments received from IWMF relate to the potential impact the proposed development would have on the operation of the existing waste facility. The applicant has submitted the supporting documents to demonstrate the impacts and how these would be mitigated and these are set out under relevant sections of the report.
35. Those writing in **support** consider the scheme to bring about better homes to the area. One of the supporting representations is from the developer of the adjoining site at Devonshire Square. They state that proposals for Daisy Business Park complement the masterplan envisaged in the AAP. These planning benefits include the provision of a new garden space split between the boundaries of the two developments, as well as active frontages to the new Devonshire Square public square.

#### Statutory consultees

36. Representations have also been received from the following external and statutory consultees.

#### Greater London Authority (GLA)

37. The GLA's Stage 1 response considers that the comprehensive redevelopment of the site is broadly supported, but there are a number of items that need to be addressed and that it does not comply with the London Plan and draft New London Plan. The reasons for this, along with Office responses, are set out below.
38. GLA officers accept that this site is suitable for SIL release. However, as Southwark is considered to be a 'no net loss borough' in line with Policy 4.4 of the London Plan and Policy E7 of the draft London Plan, any release of land from SIL should ensure no net loss of industrial capacity. It is reiterated that industrial floorspace should be re-provided at a rate equivalent to the existing floorspace which exists on site, or which could be accommodated on the existing site at a 65% plot ratio, whichever is greater. It was noted that re-provision of 1,885sqm of industrial floorspace is required (based on the scheme originally submitted). The GLA points whilst the quantum of floorspace available for light industrial (B1c) uses may satisfy the 65% plot ratio test the flexible designation of these land uses (ranging from B1a-c) does not adequately secure use of these areas as replacement industrial land use. It is noted that the council must ensure that not only that a minimum of 1,885sqm of industrial floorspace is designed at a specification suitable for B1c land uses, but this floorspace is secured for occupation by light industrial (B1c) purposes only.

39. Officer response: Since the GLA's Stage 1 report, the Secretary of State had written to the Mayor of London directing that this section of the policy for no net loss be deleted from the new London Plan. Notwithstanding this, the area of the B1c use is policy compliant and the applicant has reiterated their commitment to secure this via a section 106 (s106) agreement. It should also be noted that the existing uses on the site comprise a mixture of B1a to c and are not all light industrial.
40. The GLA points out that as the site is believed to be located within the designated Consultation Distance of a Major Hazard Site (Old Kent Road Gas Holder Station) the Health and Safety Executive (HSE) should be consulted. Further, the applicant must confirm whether the site lies within the designated Consultation Distance of a Major Hazard Site and, if so, what measures have been implemented to ensure public safety.
41. Officer response: The HSE was consulted as part of the consultation exercise and raises no objection to the grant of planning permission. The HSE has subsequently confirmed the site is no longer designated as a Major Hazard following the decommissioning and demolition of the gas holders. This is further discussed below in the relevant section.
42. 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 and where there is a net loss of employment floorspace; therefore, a financial viability assessment must be provided. Under the proposed revisions to policy H6 in the draft London Plan, the 50% threshold for fast track consideration may reduce to 35% where the scheme results in no net loss of industrial capacity.
43. As outlined above, a minimum of 1,885sqm of light industrial floorspace secured will mean there is no net loss of industrial capacity and as a result the application will be Fast Track and subject to an early stage review, but not a late stage review. The council 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 BNPP. BNPP has concluded that the scheme is providing the maximum level of affordable housing.
44. The GLA has made a comment on the shortfall in playspace provision and the applicant should revise the scheme to include greater provision of designated playspace within the scheme..
45. Officer response: The new calculated playspace is 740sqm using the GLA playspace calculator. The plans have been revised to indicate a total provision of 740sqm split between the roof top terrace and part of the ground level public square.
46. The density of the scheme can be supported in the surrounding emerging context of the Old Kent Road Opportunity Area, and the high quality design proposed. The form and heights arrangement is supported and consistent with the hierarchy of tall buildings set out in the Area Action Plan. It would also respond positively to the heights the neighbouring Devonshire Square development. However, the GLA also notes that there appears to be a lack of active frontage which addresses the

proposed east/west green link in the Area Action Plan. The applicant must therefore demonstrate how future adaptability is incorporated in the design to allow more positive relationship to this link to develop in future. It also requested an indicative layout should be included to demonstrate how the continued operation and future development potential of the adjoining church site is not prejudiced by the current development proposal.

47. Officer response: This is noted. Some revisions have been made by the applicant and the Devonshire Square applicant, which shows a more active frontage on the north side of the Devonshire Square scheme and within the garden square of the current scheme. The proposed plans also demonstrate that it would not impact on the current operation of the Church but also to ensure that it could come forward as a second phase or a standalone scheme developed by others in the future.
48. The GLA comments that the entrance/access arrangement to the car park from the square appears unresolved and the applicant should explore options to provide a direct internal link between residential core and car park.
49. Officer response: The layout of the ground floor has been amended to allow direct access from the disabled parking to the residential core, whilst remaining inside the building.
50. The Energy Hierarchy has been broadly followed and the proposed energy strategy is broadly supported; however, further revisions and information are required before the proposals can be considered acceptable. The applicant should provide a commitment to ensure that the development is designed to allow future connection to a district heating network.
51. Officer response: This is discussed in more detail in the energy section of the report. In summary, whilst the scheme would not connect to the SELCHP, the alternative strategy would provide greater savings in emissions and energy bills.
52. The GLA highlights the proposal does not meet the water consumption targets of the London Plan or the draft London Plan, and must be amended accordingly. The surface water drainage strategy would also not comply with the policies. The applicant should submit additional details to show compliance with the Old Kent Road AAP and clearly identify proposed SuDS measures giving priority to rainwater harvesting, infiltration, green roofs, swales and permeable paving.
53. Officer response: The applicant has since submitted further drainage information. The proposed drainage strategy incorporates attenuation tanks close to the source to mimic greenfield rainfall events. The proposed green landscaping will further reduce the runoff rates on a seasonal basis. The surface water runoff from the application site will be reduced to a rate of 2.2 l/s or less for all design storm event inclusive of 40% climate change allowance whilst preventing the risk of flooding on site.
54. The GLA has requested the applicant should calculate the proposed development's Urban Greening Factor, as set out in Policy G5 of the draft New London Plan, and aim to achieve the specified target.

55. Officer response: The scheme has an Urban Greening Factor of 0.25 and is a substantial improvement on the existing site which is all hardstanding or building footprint. The new scheme includes greening at ground floor and opportunities for brown, green and blue roofs.
56. The GLA requests that the applicant provide further details so that the development proposals can be considered further alongside the Healthy Streets scheme. The GLA also requests more information to enable a full and proper assessment of transport impacts and necessary mitigation. In addition, separate travel plans for the commercial and residential elements of the development should be appropriately secured.
57. Officer response: The applicant has submitted a Transport Assessment which assesses the development against the Healthy Streets indicators. Southwark Transport Planning Officers no longer require Travel Plans. The proposed Delivery Service Plan (DSP) bond is considered a more robust approach.
58. The GLA has questioned the provision of cycle parking and seeks an increase in the numbers proposed. Given the proposed cycle improvements for the area, and objectives to increase sustainable travel and expand the cycle hire network in Southwark, an appropriate contribution towards the provision of a Cycle Hire Docking Station must be secured through the s106 agreement.
59. Officer response: The applicant has since submitted amended plan that demonstrates additional cycle provision. The scheme now provides a total of 380 cycle spaces for the residential use and 42 cycle spaces for the commercial use. This is discussed in the transport section of the report.
60. The GLA comments that until the BLE is delivered, buses will be the main mode of public transport for users of the proposed development and therefore a contribution of £2,700 per residential unit is sought towards improvements to the bus network over a five-year initial period, commensurate with the impact of the development.
61. Officer response: The applicant has agreed to the contribution and this will be secured through a s106 agreement.
62. The GLA has made comments regarding the disabled parking layout. Whilst electric vehicle charging proposals accord with the minimum in the draft London Plan, given the small number of spaces, active provision for them all is strongly encouraged.
63. Officer response: Following engagement with Officers it was recommended that all 6 blue badge parking spaces were retained and the applicant should seek to accommodate the additional cycle parking spaces where possible within the site. The development will provide 2 of these spaces as 'active' and four as 'passive' electric charging points in accordance with policy.
64. The GLA points out that the new vehicular access at the northern extent of the Sylvan Grove frontage should be subject to a Stage 1 Road Safety Audit and requests further information on servicing arrangements. A full delivery and servicing plan should be secured through condition, along with a full Construction Logistics Plan.

65. Officer response:

A separate loading bay will be proposed on the street with the location to be confirmed and will be secured in the s278 agreement. A final Construction Management Plan, car parking management plan and a delivery and servicing plan will be secured by the s106 Legal Agreement.

Health and Safety Executive (HSE)

66. HSE was notified by the council, the hazardous substances authority, that the hazardous substances consent for the Old Kent Road Gas Holder Station has been formally revoked in accordance with The Planning (Hazardous Substances) Act 1990. As a result of the revocation of the hazardous substances consent, HSE has removed the consultation distance around the Old Kent Road Gas Golder Station site and there is no longer a requirement for HSE to be consulted on proposed developments in that area.

67. Officer response: This is noted and no condition will be imposed.

Environment Agency

68. The EA noted that there is no flood risk assessment, but raises no objections. The development will be at low risk of flooding. Conditions are recommended. The EA notes the adjacent Southwark Integrated Waste Management Facility - and could result in impacts including the nearby community being exposed to odour, noise and pests. Mitigation can be provided through the design of the new development to minimise exposure to the neighbouring facility and/or through financial contributions to the operator of the facility to support measures that minimise impacts.

69. Officer response: The applicant has submitted technical reports detailing the environmental impacts. The council's Environmental Protection Officer has not made any objections subject to conditions.

Metropolitan Police

70. No objections and should this application proceed, it should be able to achieve the security requirements of Secured by Design. Recommends the applicant look at certified products. The cycle parking layout should be re-visited. Conditions have been recommended.

71. Officer response: Conditions will be imposed. The proposed cycle parking store is segregated between residential and commercial uses and it is not considered that this would raise any security issues.

TfL London Underground Infrastructure Protection

72. No comments to make.

Natural England

73. No comments to make.



Internal consultation

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

Table: Internal consultee comments

<b>Consultee</b>	<b>Summary of Comments</b>	<b>Officer response</b>
Environmental Protection Team (EPT)	<p>The two odour assessments have indicated a low risk for odour impact from the waste centre and its emissions, and the winter gardens should address the fugitive emissions from passing refuse trucks.</p> <p>Given the noise assessment that was carried out together with the mitigation from the changed layout of residential levels 2-5 balconies to winter gardens, the issue of noise impacts from the IWMF has been addressed. The winter gardens will also address potential odours at low level arising from passing HGVs.</p>	Recommended conditions included.
Archaeology Officer	<p>The site is currently within the Bermondsey Lake Archaeological Priority Zone (APZ) Previous excavations which have taken place to the immediate west, north and south of the application site have been largely negative. The applicant has submitted a desk based assessment and is a very thorough piece of archaeological research and is approved. The DBA identifies the</p>	Recommended conditions included. A s106 financial contribution is requested for monitoring.

	<p>potential for archaeological remains to survive on this site and therefore conditions should be applied to any consent.</p>	
Urban Forester	<p>There are no existing trees or landscape. It is recommended that a specific tree planting condition to capture the two street trees outside their ownership on Sylvan Grove.</p> <p>A payment in lieu can be agreed to provide them elsewhere at suitable locations in the vicinity.</p>	Recommended conditions included.
Ecology Officer	<p>The ecology survey is fine no further surveys are required.</p> <p>The site can offer net gain for biodiversity. Conditions requiring green roofs, 6 house sparrow terraces and 6 bat tubes are advised.</p>	Recommended conditions included.
Local Economy Team	<p>The intention on providing existing tenants with the opportunity to locate to the new commercial floorspace once operational is welcomed.</p> <p>There will be construction phase jobs / skills and employment requirements and End use of the development jobs / requirements in the s106.</p> <p>This development would be expected to deliver 49 sustained jobs to</p>	Recommended obligations to be included in the s106.

	<p>unemployed Southwark residents, 49 short courses, and take on 12 construction industry apprentices during the construction phase, or meet the Employment and Training Contribution.</p> <p>A development of this size and with the proposed employment densities would be expected to deliver 20 sustained jobs for unemployed Southwark Residents at the end phase, or meet any shortfall through the Employment in the End Use Shortfall Contribution.</p> <p>No later than six months prior to first occupation of the development, the developer to provide a skills and employment plan to the council.</p>	
Transport Planning team	No objections subject to conditions and s106 obligations.	Recommended conditions and obligations to be included in the s106.
Highways development management team	A number of s278 works have been requested. Developer to reconstruct the Sylvan Grove carriageway and repaving the footway. It has also been advised that the vehicle crossovers be constructed to SSDM standards. A comment was made that as Sylvan Grove is a cul-de-sac, it is mandatory to provide a	Recommended obligations to be included in the s106.

	<p>vehicle turning facility hence the need to locate the proposed sliding gate further back into the car park. Comments on substation access, accessibility, drainage, landscaping and design details to be adoptable standard have been raised.</p>	
Flood and Drainage team	<p>Generally accept the proposals, which propose to limit surface water discharge rates to greenfield rates (2.2 l/s) for the 1% AEP storm + cc allowance using a range of Suds features.</p>	<p>Recommended conditions included.</p>
Public Health	<p>Request that a Rapid health impact assessment be submitted. Also notes that the entrances to the affordable and private units should be shared. Encourage the communal amenity rooftop space to be open up to the public. Require that the applicant reconsider and include more green and open space into their scheme. Require the submission of the engagement summary.</p>	<p>The HIA is not in the current validation checklist. Plans have been submitted to ensure the entrances are shared. The provision of the new public square would be more effective for members of the public than on the communal rooftop, which provides a secure communal space for new residents. . An engagement summary has been submitted. The development of the site is in line with the revised AAP masterplan for the area.</p>
Parks and Leisure	<p>Limited provision of public open space in this area that is short of open space and therefore would have impact on existing parks.</p> <p>Request that 30% of new planting be of native species.</p> <p>Seek financial</p>	<p>The scheme provides for new public open space which would complement the proposed open spaces in the Devonshire Square development in line with the revised AAP masterplan. The site is currently a car park which is not open to the public and the proposal would therefore provide a</p>

	contributions towards parks.	new public open space. Further discussion on open space is discussed in that section of this report, which includes contribution towards local parks.
--	------------------------------	---

## KEY ISSUES FOR CONSIDERATION

### Summary of main issues

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

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

### Legal context

76. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2016, the Core Strategy 2011, and the Saved Southwark Plan 2007.

77. There are also specific statutory duties in respect of the Public Sector Equalities Duty which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

### **Adopted planning policy**

#### National Planning Policy Framework (NPPF)

78. The revised National Planning Policy Framework ('NPPF') was published in February 2019 which sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental.
79. Paragraph 215 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.
80. Chapter 2 Achieving sustainable development  
 Chapter 5 Delivering a sufficient supply of homes  
 Chapter 6 Building a strong, competitive economy  
 Chapter 8 Promoting healthy and safe communities  
 Chapter 9 Promoting sustainable transport  
 Chapter 11 Making effective use of land  
 Chapter 12 Achieving well-designed places  
 Chapter 14 Meeting the challenge of climate change, flooding and coastal change  
 Chapter 15 Conserving and enhancing the natural environment  
 Chapter 16 Conserving and enhancing the historic environment

#### London Plan 2016

81. The London Plan is the regional planning framework and was adopted in 2016. The relevant policies of the London Plan 2016 are:

Policy 2.17 Strategic Industrial locations  
 Policy 3.3 Increasing housing supply  
 Policy 3.5 Quality and design of housing developments  
 Policy 3.6 Children and young people's play and informal recreation facilities  
 Policy 3.8 Housing choice  
 Policy 3.9 Mixed and balanced communities  
 Policy 3.10 Definition of affordable housing  
 Policy 3.11 Affordable housing targets  
 Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes  
 Policy 3.13 Affordable housing thresholds  
 Policy 4.3 Mixed use development and offices  
 Policy 4.4 Managing industrial land and premises  
 Policy 5.7 Renewable energy  
 Policy 5.8 Innovative energy technologies  
 Policy 5.11 Green roofs and development site environs  
 Policy 5.12 Flood risk management  
 Policy 5.13 Sustainable drainage  
 Policy 5.21 Contaminated land  
 Policy 6.9 Cycling

Policy 6.10 Walking  
 Policy 6.13 Parking  
 Policy 7.2 An inclusive environment  
 Policy 7.3 Designing out crime  
 Policy 7.4 Local character  
 Policy 7.6 Architecture  
 Policy 7.8 Heritage assets and archaeology  
 Policy 7.21 Trees and woodlands  
 Policy 8.2 Planning obligations  
 Policy 8.3 Community infrastructure levy

82. 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.
83. 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

84. The Core Strategy was adopted in 2011 providing the spatial planning strategy for the borough. The strategic policies in the Core Strategy are relevant alongside the saved Southwark Plan (2007) policies. The relevant policies of the Core Strategy 2011 are:

Strategic policy 1 - Sustainable development  
 Strategic policy 2 - Sustainable transport  
 Strategic policy 3 - Shopping, leisure and entertainment  
 Strategic policy 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)

85. In 2013, the council resolved to 'save' all of the policies in the Southwark Plan 2007 unless they had been updated by the Core Strategy with the exception of Policy 1.8

(location of retail outside town centres). Paragraph 213 of the NPPF states that existing policies should not be considered out of date simply because they were adopted or made prior to publication of the Framework. Due weight should be given to them, according to their degree of consistency with the Framework. The relevant policies of the Southwark Plan 2007 are:

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

#### Council's Supplementary Planning Document (SPD)

- 86. 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 (2015)
- Section 106 Planning Obligations and Community Infrastructure Levy (2015)
- Development Viability SPD (2016)

#### Greater London Authority Supplementary Guidance

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



Affordable Housing and Viability SPG (2017)

### **Emerging planning policy**

#### Draft New London Plan

88. The draft New London Plan was published on 30 November 2017 and the first and only stage of consultation closed on 2nd March 2018. Following an Examination in Public, the Mayor then issued the Intend to Publish London Plan. The Secretary of State responded to the Mayor in March 2020 where he expressed concerns about the Plan and has used his powers to direct changes to the London Plan. The London Plan cannot be adopted until these changes have been made. Until the London Plan reaches formal adoption it can only be attributed limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.
89. The draft New London Plan identifies the Old Kent Road as having a minimum capacity for 12,000 homes and a jobs target of 5,000, which increases the capacity of the adopted London Plan of 2,500 homes and 1,000 jobs.

#### Old Kent Road Area Action Plan (OKR AAP)

90. 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.
91. 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 18 which covers the Devon Street and Sylvan Grove area. Requirements for this allocation site include provision of office space, studio and managed workspaces. It is expected that there be new public square and new access road into the waste facility.

#### New Southwark Plan

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

Modifications for Examination) were submitted to the Secretary of State in January 2020 for Local Plan Examination. The New Southwark Plan Submission Version (Proposed Modifications for Examination) is the council's current expression of the New Southwark Plan and responds to consultation on the NSP Proposed Submission Version. This version will be considered at the Examination in Public (EiP).

94. It is anticipated that the plan will be adopted in late 2020 following an EiP. As the NSP is not yet adopted policy, it can only be attributed limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.
95. The site is within the part of the Site Allocation (NSP66) 'Devon Street and Sylvan Grove' in the emerging NSP. The vision for this area is for:
- new homes (Class C3);
  - community uses (D use class);
  - retail (A1, A2, A3, A4) on the Old Kent Road frontage;
  - Provide at least the amount of employment floorspace currently on the site (B use class);
  - Provide a new access road into the IWMF; and
  - Provide public open space.

**Principle in terms of land use, including consideration of emerging policy for the Old Kent Road Opportunity Area**

96. The site is located in the Core Strategy's Preferred Industrial Location-Strategic (SPIL) and also within the London Plan's Strategic Industrial Location (SIL) which is an industrial location of strategic importance as identified in the Core Strategy and the London Plan (2016). Introducing housing here would therefore represent a departure from the adopted Southwark and London Plan. Strategic Policy 10 of the Core Strategy states that SPIL will be protected for industrial and warehousing uses. Saved Southwark Plan policy 1.2 states that the only developments that will be permitted in SPIL are B class uses and other sui generis uses which are inappropriate in residential areas. The proposed development would represent a departure from these policies by introducing residential uses into the SPIL.
97. Recognising that the site is located in the OKROA where the draft OKR AAP sets an aspiration to deliver 20,000 new homes alongside industrial and other uses, Officers have worked closely with the GLA to agree on the release of significant areas of the SIL to allow for mixed use redevelopments to come forward and have agreed a geography of the strategic industrial land release and consolidation. The agreed maps propose the release of the site from the SIL to allow for the provision of new homes. The agreed maps have been included in the emerging NSP.
98. Members should however note that even with this agreement in place the draft OKR AAP and NSP would still need to be subject to an Examination in Public (EiP) and the Secretary of State's approval before they become the adopted development plan position. It should also be noted that there have been a number

of objections to the proposed release of industrial land from third parties which would need to be considered at the EiP.

The Old Kent Road Area Action Plan (OKR AAP)

99. As stated above, the OKR AAP places the site within the proposed Action Area Core, and within proposal site OKR 18 which covers the Devon Street and Sylvan Grove area. It stipulates that development must:

- Replace existing employment space, including retail floorspace (A use class); and
- Provide residential or other town centre uses above employment space; and
- Provide new a new public square off Devonshire Grove; and
- Provide a new access road into the IWMF; and
- Provide on-site servicing.

100. Emerging policy AAP6 of the OKR AAP states that development must:

- Retain or increase the amount of Class B floorspace on site;
- Accommodate existing businesses on site or in the wider Old Kent Road Opportunity Area, or provide relocation options for businesses that would be displaced by redevelopment;
- Ensure a specialist provider would manage the workspace;
- Secure an element of affordable workspace, and;
- Result in an increased number of jobs.

The proposal would achieve all of these aspirations as follows:

- From an existing 1,958sqm to 2,986sqm GIA of new Class B floorspace would be provided;
- A workspace coordinator would manage the workspace;
- 10% affordable workspace would be provided; and
- Approximately 265 jobs would be created, a significant uplift when compared to the previous 144 jobs.

101. It should be noted that the GLA had based their comments on the scheme originally submitted which had proposed a greater quantum of B1 class floorspace. Since then the scheme has been amended to provide a ground floor internal communal amenity space which has resulted in a total of 2,986sqm of B class floorspace. The GLA had noted in their Stage 1 report that Southwark is considered to be a 'no net loss borough' and any release of land should ensure that there is no net loss of industrial capacity. . Where the 65% plot ratio is applied to the existing industrial land on site, it is noted that re-provision of 1,885sqm of industrial floorspace is required.

102. Nevertheless, on 13<sup>th</sup> March 2020 the Secretary of State directed that this policy be deleted from the draft new London Plan, although he did note that local authorities would need to provide for workspace within their plans. Having directed this change the council will also need to consider its commitments within the NSP in order to ensure general conformity with the New London Plan. The application proposes a

flexible B1 use (a-c), but the applicant has confirmed that at least 1,885sqm will be allocated for B1(c) and would be secured through condition and a clause in the s106 agreement.

103. Notwithstanding the above, in determining whether the principle of the proposed development would be acceptable in land use terms, specifically the introduction of housing in the SIL, 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.

104. Officers consider that the key benefits arising from the proposal would be as follows.

#### Employment floorspace

105. As explained above, there would be an uplift of employment use (B1 class). As the new floorspace would provide a mix of B1a-c uses, this significantly increases the intensity and number of employment opportunities available. There would therefore potentially be a net gain of approximately 120 jobs and is a positive aspect of the proposal.

106. The LET have also set out further requirements in order to ensure that this development delivers employment and training for local people. All will be secured through the s106 and is set out in the s106 section of this report.

#### Business relocation and retention

107. The current building is a 'workspace' style building with a series of small office suites which are occupied on relatively short leases and which there is a regular turnover. There are some tenants who have been there for a few years with some that would be renewing leases. The applicant shall be re-providing small suites to continue to provide SME units and intend on providing existing tenants with the opportunity to locate to the new commercial floorspace once operational. The applicant has agreed an obligation in the S106 that will have such a strategy in place.

#### Affordable workspace

108. The applicant has agreed to provide an element of affordable workspace within the scheme comprising 10% of the commercial floorspace. The cost per sq ft and duration of offering would be £12 per sqft over a 15 year period, and would be secured through the s106 agreement. The intention is to secure the service charge and insurance inclusive of the rent to ensure the space is genuinely affordable.

109. 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 will continue to manage the commercial building and would therefore not need an affordable workspace provider.

Provision of housing, including affordable housing

110. The scheme would provide 219 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. The adopted London Plan (2016) requires the provision of a range of housing and sets the borough a target of 27,362 new homes between 2015 and 2025. 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 OKROA and the expectation of significant new housing provision.

Provision of a new public open space

111. The proposed development would deliver high quality public realm of 700sqm. This is essentially an extension to the public open space proposed in the Devonshire Square site. The 2017 AAP master plan had no requirement for public open space on this particular site. However following public consultation on the plan and engagement with the applicant and the neighbouring developers this has been amended and the master plan shows the provision of public open space, as a direct benefit to the residents of Sylvan Grove. This application would be providing that space in line with the revised masterplan. This public garden square would be a significant improvement over the existing site conditions. The proposal would increase park and open space provision in line with the strategic objectives of the council's Open Space Strategy (2013).

Prematurity

112. 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.

113. Refusal of planning permission on grounds of prematurity would seldom be justified where a draft Local Plan has yet to be submitted for examination, or in the case of a Neighbourhood Plan, before the end of the local planning authority publicity period. Where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how the grant of permission for the development concerned would prejudice the outcome of the plan-making process."

114. The most up to date development plan pertinent to the Old Kent Road area is the 2016 London Plan. This identifies the Old Kent Road Opportunity Area as having significant potential for housing led growth. The draft OKR AAP has been developed in response to this adopted plan and has also sought to address the emerging policy position of the draft New London Plan including the increased housing target for the opportunity area and the need to ensure that the New London Plan aspirations for industrial land and employment are addressed. This scheme is not considered to undermine either the strategic or local plan making process, and reflects the adopted statutory development plan position of the 2016 London plan and the direction of travel of the draft New Southwark Plan and the 2016 and 2017 draft OKR AAPs and the 2018 draft New London Plan. It is not therefore considered to be premature.

### **Conclusion on land use**

115. To conclude in relation to land uses, the proposed development would be contrary to strategic policy 10 of the Core Strategy and saved policy 1.2 of the Southwark Plan owing to the introduction of residential into the SIL would represent a departure from the adopted development plan.
116. This must therefore be weighed against the benefits of the scheme which include:
- the provision of housing, of which 35.1% would be affordable;
  - the provision of good quality, flexible commercial space including affordable workspace;
  - job creation;
  - repair and improved physical environment;
  - active frontage and improved pedestrian access through the site; and
  - provision of new open space,
117. 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 and in particular the adjoining Devonshire Square and its future uses, it is not felt that the introduction of housing would prejudice the operation of existing businesses in the area. For these reasons, officers consider that the principle of the proposed development in land use terms should be supported in this instance.

### **Environmental impact assessment**

118. Prior to the submission of this application, the applicant had submitted a request for an EIA Screening opinion (ref 19/AP/1117) under Regulation 6(1) of the EIA Regulations. This was to ascertain whether the Local Planning Authority considered there would be significant environmental effects are likely to arise from the proposed development. No formal written response was given and this section will make an assessment.
119. Officers consider that the proposed development does not fall within the definition of Schedule 1 development. In Column 1 of the table in Schedule 2, Category 10

(b) relates to 'Urban Development Projects'. The proposed development would be an 'Urban Development Project' and consequently it would constitute Schedule 2 development within the meaning of the EIA Regulations. It would also include more than 150 dwelling houses and therefore it would be necessary to assess the potential impact of the proposal against Schedule 3 of regulations.

120. Based on the assessment against the checklist, no significant likely effects have been identified and accordingly the conclusion reached is that the proposed development would not be likely to have significant effects upon the environment virtue of factors such as its nature, size or location. The matters to be considered can be adequately assessed through the submission of technical reports submitted with the planning application. The proposed development is therefore not considered to constitute EIA development.

### **Provision of housing and affordable housing**

121. 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. 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.
122. The Southwark Plan saved policy 4.4 requires at least 35% of all new housing as affordable housing. Of that 35%, there is a requirement for 50% social housing and 50% intermediate housing in the Old Kent Road Action Area. The adopted London Plan 2016 sets a strategic requirement of 60% social housing and 40% intermediate housing. The emerging NSP Policy P1 sets a requirement for a minimum of 25% of all the housing to be provided as social rented and a minimum of 10% intermediate housing to be provided when calculated by habitable rooms, this equates to 71.5% social housing and 28.5% intermediate housing. .
123. In total, 617 habitable rooms would be provided in the development. The development would provide a total of 217 affordable habitable rooms which would equate to an overall provision of 35.1%. The level of provision is therefore acceptable and policy compliant.
124. Southwark's Development Viability SPD requires a financial viability appraisal to be submitted for all planning applications which trigger a requirement to provide affordable housing. The financial viability appraisal should identify the maximum level of affordable housing that can be sustained and justify any proposed departures from planning policy requirements. This application is therefore accompanied by a viability report, which was reviewed by independent consultants on behalf of the council.
125. Discussions on the initial variables and benchmark land value (BLV) were had following updated inputs from the applicant. It has been agreed that the BLV is £5.09m. The council's consultant BNPP made a number of adjustments to the applicants appraisal as follows:

- the Benchmark Land Value of £5.09m has been inputted;
  - Adjustment of BLV Yield to 6%;
  - the following profit targets were inputted on Gross Development Value (GDV): 17.5% for private residential, 15% for commercial and 6% for affordable residential;
  - private residential values were adjusted to an average of £800 per sqft and affordable unit values were adjusted to an average of £113.5 per sqft;
  - BNPP adopted a yield of 5% for the proposed schemes commercial units.
126. Following the above referenced adjustments, the updated appraisal of the proposed scheme generates a residual land value of c. £2.21m and when benchmarked against a site value of c. £5.09m the proposed scheme generates a deficit of c. £2.88m. The council's consultant therefore concludes that the current viability position does not support an increased provision of affordable housing. It should be recognised that the site is located within the OKROA which sees the ongoing regeneration of the Old Kent Road area including the Bakerloo Line Extension and therefore it is likely that both residential and commercial values would grow over time, which would improve the viability of the scheme.
127. A standard policy compliant 35% habitable rooms offer would equate to 216 affordable habitable rooms, with 25% social rent at 154 habitable rooms, and 10% Intermediate at 61.7 habitable rooms.
128. The proposed 35.1% habitable rooms offered would have a split of 157 social rent habitable rooms (25.4%) and 60 Intermediate habitable rooms (9.7%). The intermediate is only marginally below the required split but the social rent is greater than the minimum and meets the emerging NSP policy requirement.
129. Overall, the proposal would provide a total of 59 affordable units in a mix of unit sizes. A s106 agreement is recommended to secure the delivery of these units, including a clause preventing the occupation of more than 50% of the private apartments until 50% of the affordable units are completed, and a clause to prevent more than 90% of the private sale apartments being occupied across the development until 100% of the affordable housing is complete. In line with the Mayor's Affordable Housing and Viability SPG, an early review mechanism would be secured by the s106 agreement, which would come into effect if the development does not substantially commence within 24 months. The review would determine whether the viability of the development has improved during that time, and accordingly whether it could deliver any more affordable housing.
130. A contribution of £7,808 (a charge of £132.35 per affordable unit) has been agreed towards affordable housing monitoring and maintained provision of these units, and would be secured by the s106 Agreement.
131. The scheme has been amended so that both the affordable and private units would access the building via a single shared entrance and lobby.

### **Housing Mix**

132. Core Strategy Strategic Policy 7, 'Family Homes', requires a housing mix of at least



60% dwellings with two or more bedrooms, with 20% having at least three bedrooms. No more than 5% of the units should be studios, and these can only be for private housing.

133. For ease, the proposed housing mix for the whole scheme is summarised again in the table.

**Table: Proposed Housing Mix**

Unit type	Number of units	Percentage (%)
Studio	11	5
1 bedroom unit	89	40.6
2 bedroom unit	89	40.6
3 bedroom unit	30	13.7
<b>Total</b>	<b>219</b>	<b>100</b>

**Table: Proposed Housing Mix Across Affordable Tenures (by unit)**

Unit type	Social Rented units	Intermediate units	Total units	Percentage (%)
Studio	0	0	0	0
1 bed	11	9	20	34
2 bed	0	9	9	15.2
3 bed	27	3	30	50.8
<b>Total</b>	<b>38</b>	<b>21</b>	<b>59</b>	<b>100</b>

134. At 5% the proposed proportion of studio units would meet the policy maximum of 5% and are all allocated to the private tenure.
135. The proposal would also fall short of the other housing policy requirements with 54.3% of the dwellings having two or more bedrooms and 13.7% having three bedrooms. For the affordable housing however, the mix is much improved to the policy position, with 66% having two or more bedrooms and 50.8% having three bedrooms. In all, twenty seven 3 bedroom social rent flats would be provided and three 3 bedroom intermediate affordable units. The 3 bedroom flats in the social rent tenure are a mix of 4, 5 and 6 person flats and are therefore offering a range of size and type of family dwellings. This affordable mix is welcomed despite the shortfall for the scheme overall.

#### Wheelchair accommodation

136. The London Plan Policy 3.8 requires 10% of new housing to be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users (Building Regulations requirement M4 (3) 'wheelchair user dwellings'). Saved Policy 4.3 of the Southwark Plan support this, requiring 10% of new dwellings to be suitable for wheelchair users, except where this is not possible due to the physical constraints of the site. London Plan Policy 3.8 also requires 90% of new housing meets Building Regulations requirement M4 (2) 'accessible and adaptable'. This is reiterated in emerging policy in the draft OKR AAP and the NSP.
137. The applicant has confirmed that a total of 22 units would be wheelchair accessible, which equates to 10% meeting the policy requirement. This would be split into the

following tenures:

- 9 x Social rented
- 11 x Private

138. The wheelchair housing would be secured through the s106 agreement. Level and safe access would also be provided throughout the proposed public realm and new square. The social rented units would be required to be fully fitted for first occupation, with private units being adaptable.

#### Density

139. Policy 3.4 Optimising Housing Potential of the London Plan 2016 states that development should optimise housing output for different types of location within the relevant density range. 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 and is in line with the London Plan.
140. As the site is located within the Urban Zone, a density range of 200 to 700 habitable rooms per hectare (HR/Ha) would be sought. The development would need to meet the criteria for exceptional design as set out in section 2.2 of the Residential Design Standards SPD 2015.
141. The development as a whole would have a density of approximately 2,502HR/Ha including the commercial floorspace. It should be noted that whilst this represents a higher density development above the typical ranges set out in policy, the draft New London Plan intends to delete reference to any density matrix and to replace it with reliance on improved design approaches focusing on design quality and urban greening. The location of the site with the future improved transport links and in the context of the future development surrounding the site means the proposed higher density is appropriate and would be consistent with the surrounding urban grain. Officers however, have also assessed the scheme against the design criteria since the maximum upper limit of 700HR/Ha would be significantly exceeded. The development would need to demonstrate that it would be excellent in relation to housing and design quality. If it can be demonstrated that an excellent standard of accommodation would be provided, makes an exceptional contribution to the regeneration of the area, 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. There is a pressing need to optimise the use of land in London, particularly in Opportunity Areas. The proposal would result in a good standard of accommodation, with many of the 'exemplary' requirements of the Southwark Residential Design Standards SPD 2015 met. This is summarised in the table below with full assessment and commentary provided in other sections of the report.

Exemplary residential design criteria from Residential Design Standards SPD	Commentary
---	------------

Provide for bulk storage	Each of the proposed units would provide for built in storage that would meet or exceed the standards set in the Residential Design SPD. In addition to this, bulk storage is proposed on the mezzanine level.
Exceed minimum privacy distances	Minimum privacy distances would be exceeded between habitable rooms.
Good sunlight and daylight standards	The majority of the units would have good sunlight and daylight standards achieved. This is further explained in this report.
Exceed minimum ceiling heights of 2.3m	All rooms within the proposed dwelling would exceed the minimum 2.3 metre floor-to- ceiling height.
Exceed amenity space standards (both private and communal)	The amenity space proposed is set out in the subsequent section on Outdoor amenity space, Children's Play Space and Public Open Space section of this report. Where the recommended 10 sqm private amenity space has not been met, the shortfall has been partly provided as communal amenity space, although there would still be a need for an in lieu payment in line with the Residential Design Standards SPD.
Secure by Design certification	No objections raised. Key principles of Secured By Design are to be incorporated into this large scale development. This scheme would achieve Secured by Design Accreditation. Conditions to require this are recommended
No more than 5% studio flats	There will be no more than 5% studio flats.
Maximise the potential of the site	The potential of this site would be maximised, delivering improved commercial floor space, new dwellings, outdoor space and play space and a new open space without compromising local visual or residential amenity.
Include a minimum 10% of units that are suitable for wheelchair users	At least 10% of the proposed units would be suitable for wheelchair users.

Excellent accessibility within buildings	The accessibility within the buildings would be excellent.
Exceptional environmental performance	The development is capable of achieving BREEAM "excellent". The development would need to make a carbon off set payment contribution as the residential element is not capable of delivering zero carbon homes. The applicant has agreed to make the payment which makes this aspect of the scheme fully policy compliant. The development would exceed the minimum policy requirement for the non-domestic part of the scheme.
Minimised of noise nuisance between flats through vertical stacking of similar room types	The plans submitted demonstrate that a good level of stacking for each of the tenures. The noise impact assessment demonstrates that the internal noise levels could be achieved and as such is considered to be acceptable. This is explained in further detail in this report.
Make a positive contribution to local context, character and communities	The proposed development would make a positive contribution to local context, character and communities in terms of its quality of design and regeneration benefits including affordable housing, workspace and investment in local transport and public space.
Include a predominance of dual aspects units	53% of the total units (116 units) proposed would be dual aspect. 61% of the affordable units would be dual aspect with the private units offering 50%.
Have natural light and ventilation in all kitchens and bathrooms	All kitchens would benefit from natural light and ventilation due to their open plan configuration. Bathrooms on the other hand would not achieve this as all bathrooms would be internalised but will benefit from mechanical ventilation.
At least 60% of units contain two or more bedrooms	The proposal would provide 54.3% of the dwellings having two or more bedrooms and 13.7% having three bedrooms. For the affordable housing, the mix is much improved to the policy position, with 66%

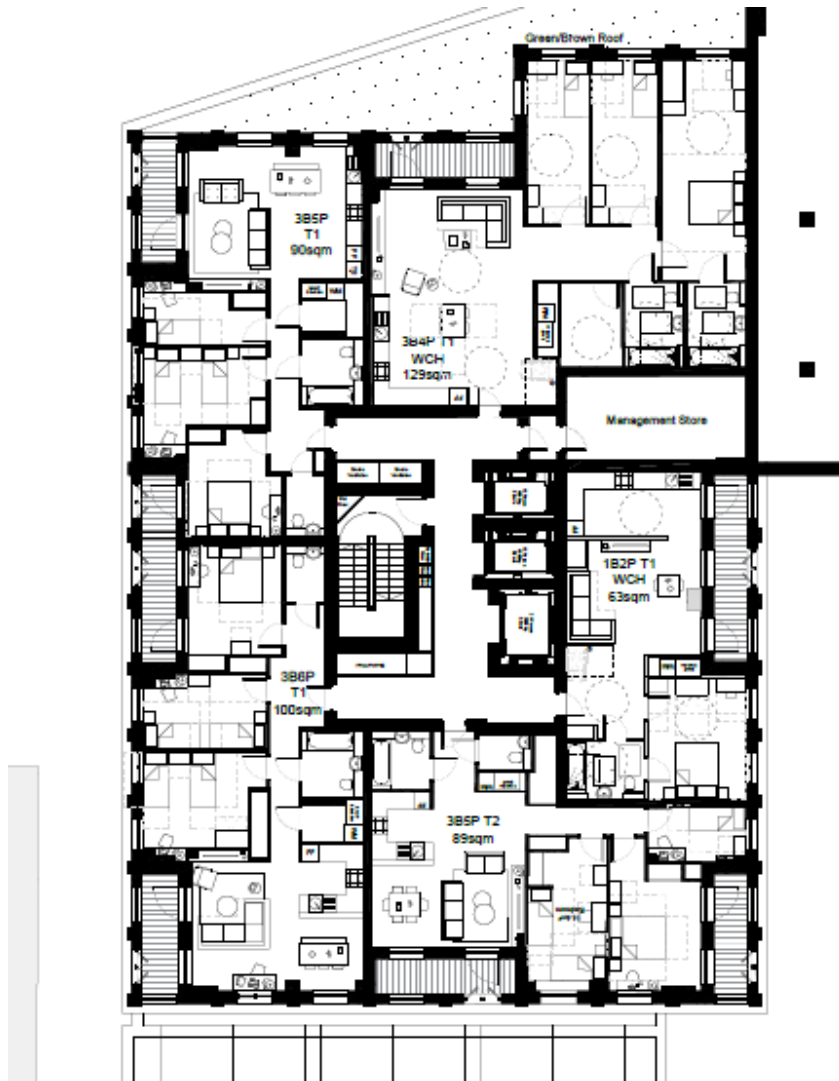
	having two or more bedrooms and 50.8% having three bedrooms.
Significantly exceed the minimum floor space standards	All units would meet or exceed the minimum space standards.
Minimise corridor lengths by having additional cores	No more than 8 flats per core per floor is proposed, complying with the Mayor's Housing Design SPG which advises no more than 8 flats per core.

142. For the reasons detailed in the paragraphs below and table above, the higher density proposed would not significantly compromise the quality of accommodation and the impacts of the development would be acceptable.

#### Quality of accommodation

143. 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 2015 (the "SPD" in this report) and include guidance on overlooking standards as well as requiring the minimum size. The following paragraphs discuss in detail the internal daylight and dual aspect within the proposed residential units, overlooking issues, amenity space, child play space and noise implications.

**Plan: Typical layout on upper floors (social rent tenure)**



Unit sizes

144. All proposed homes would meet or exceed the standards as set out in the SPD. The following table sets out the minimum flat size requirements as set out in the SPD, and also the flat sizes that would be achieved:

**Table: Unit types and proposed size of units**

Unit Type	SPD Requirement (sqm)	Size range proposed (sqm) including wheelchair units
1 Bed 1 Person (studio)	39	41
1 Bed 2 Person (flat)	50	50 – 63
2 Bed 3 Person (flat)	61	66 – 72
2 Bed 4 Person (flat)	70	70 – 73
3 Bed 4 Person (flat)	74	107 – 129
3 Bed 5 Person (flat)	86	89 – 90
3 Bed 6 Person (Flat)	95	100

Internal daylight within the proposed residential units

145. A daylight and sunlight report based on the Building Research Establishment (BRE) Guidance has been submitted which considers daylight to the proposed dwellings using the Average Daylight Factor (ADF). ADF is a measure of the overall amount of diffuse daylight within a room. It is the average of the daylight factors across the working plane within a room. 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.
146. The submitted daylight report provides an analysis on the units up to level 11 as those units above that floor have adequate daylight levels. The baseline targets for the assessment are based on the future cumulative scenario with the Devonshire Square development in place as this would be the worse case scenario. A second report was also submitted to show the impacts without the Devonshire Square development and confirmed that the resultant daylight levels to the surrounding properties would improve.
147. As the Living kitchen dining rooms (LKDs) within the development now include winter gardens, it is assumed that the default scenario will be for the outer doors to be closed and the inner doors to remain open in order to maintain the maximum available internal space. The applicant's reassessment in the revised condition indicates only 4 room (all of which are LKDs) are not compliant. These represent only minor derogations from the BRE Guidance and provide a 99% compliance level. It is considered that this development would achieve a high degree of BRE compliance and the units would have good levels of daylight.

Overlooking

148. The Residential Design Standards SPD recommends a minimum of 21m between the backs of properties to prevent any overlooking, and 12m where properties would face each other across a highway or other public realm.
149. The development is not within close proximity to any residential habitable windows surrounding the site. The proposed development is located at an angle that would not allow any direct overlooking into the future neighbouring Devonshire Square

development. The L-shaped footprint means that there would not be any direct overlooking between the commercial uses and the proposed residential dwellings. The proposed commercial Building E in the Devonshire Square development located to the west of the residential units in this scheme has been carefully designed to limit any overlooking.

150. Where the residential unit overlook the communal roof terrace, this would be provided with a defensible space in the form of private terrace to ensure privacy. It is considered that the proposed occupiers of the residential development would have good levels of privacy.

#### Aspect and outlook

151. The scheme would have 52% of the total units (116 units) be of dual aspect. Looking at this by tenures, 61% of the affordable units would be dual aspect with the private units offering 50%. Whilst there is a relatively high proportion of single aspect units, the outlook of these units are very good. The units have good views out onto the new square and there are no physical obstructions immediately in front of the single aspect units and none that are north facing only.
152. Mitigation is also proposed in the form of full height glazing, large opening windows and well laid out dwellings and exceeding minimum flat sizes.

#### Amenity space and playspace

153. All new residential development must provide an adequate amount of useable outdoor amenity space. Policy 3.6 of the adopted 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 policy AAP 10.
154. Four categories of open space are required in major planning applications in the Old Kent Road Opportunity Area:
- Private amenity space;
  - Communal amenity space (usually courtyards, podium gardens or roof terraces);
  - Children's play space; and
  - Public open space.

#### Private amenity space

155. The following amount of amenity space would need to be provided as clarified further in the council's SPD:
- 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 where it isn't feasible to provide this ;

- 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.

156. In the proposed development, private amenity would be provided for all of the units in the form of balconies or winter gardens on the lower levels. Communal amenity spaces for residents would be provided in the form of the roof terrace on the lower block as well as a communal room on the ground floor measuring 68sqm.
157. In this case, a total of 2,190sqm of private amenity space would need to be provided between the 219 units in accordance with the SPD. In this instance there is a shortfall of 785.7sqm (rounded to 786sqm) of private amenity space. Whilst there is a shortfall, it should be noted that some of the living room sizes are larger than the minimum requirement.

#### Communal amenity space

158. Where the full recommended provision of 10sqm per residential unit has not been provided, the shortfall has been added to the communal requirement. In this instance, there is a shortfall of 786sqm of private amenity space. A provision of 786sqm of communal amenity space, plus the minimum of 50sqm would have been required (a total of 836sqm).
159. There is a roof garden on the lower commercial block and is accessed from the main residential building on the 6<sup>th</sup> floor level. There is also a communal amenity room on the ground floor with direct access from the garden square. The roof top communal amenity space equates to 573sqm and the ground floor communal amenity room is 68sqm. The total communal amenity space provision (excluding the internal space) at 573sqm will fall short of the above requirement. Discounting the children's playspace on this roof terrace, there would be a total of 363 sqm of communal amenity space and the shortfall would be 473sqm. The council's S106 SPD stipulates that where amenity space cannot be provided fully on site the shortfall can be mitigated by way of financial contribution in exceptional circumstances. This is calculated at £205 per sqm, equating to a total of £96,965 and could go towards the provision of new park space, elsewhere in the plan area including at Livesey Park. This proposed roof garden is accessible to all tenures. The roof comprise of play areas (discussed further below), raised central decking feature, seating opportunities rooftop tree planting. Amended plans were received which removed part of the ground floor commercial floor space to provide an internal communal amenity room that would also be accessible to residents of all tenures. This space could be used for various activities and would benefit from having tall floor-to-ceiling height and overlooking the proposed garden square. In addition, the space could be made available for the tenants in the adjoining development at 8-24 Sylvan Grove for community events such as TRA meetings. It is recommended that provision be secured in a s106 agreement.

**Image: Communal amenity space on roof**



### Children's play space

160. In line with the Mayor's Providing for Children and Young People's Play and Informal Recreation SPG (using the June 2019 calculator) the development would be required to provide 740sqm of children's play space.
161. The Mayor's SPG sets out the intended strategic approach to delivering new and enhanced playspace both on and off-site in new developments. It explains that 'doorstep' play (Under 5s) should usually be provided on-site, unless there is existing provision within 100 metres. For 5-11 year olds and children over 12 years old, it recommends that off-site provision is acceptable, if there is existing provision within 100-400 metres and 400-800 metres respectively. This is summarised in Table 4.5 of the SPG, reproduced below.

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

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

162. 210sqm of play space is provided in the communal roof terrace and 530sqm within the public park, giving a total of 740sqm of children's play space which meets the above policy requirement.
163. The submission material sets out the type of play provision, including formal play structures, incidental play features and informal play/playable landscape features is identified. The proposed approach to dedicated play space provision has been to maximise 'doorstep' play for under 5's on-site, in line with the Mayor's SPG. However, it is possible that some areas could provide for older children on-site such as table tennis.
164. The play area on this level has not yet been designed in detail and a condition requiring detailed design is recommended.

**Image: Play space strategy and distribution across the site**



- Under 5's doorstep play to roof terrace
- Playable landscape within garden square for under 5's, 5 - 11, 12+ and 16 & 17 year olds
- Overall extent of public realm within the garden square (excluding area under colonnades) = 700m<sup>2</sup>

### Public Open Space

165. In addition to the existing amenity space requirements set out above, emerging Policy AAP10 of the draft OKR AAP requires the provision of 5sqm of public open space per dwelling or a financial contribution in lieu. This would equate to 1,095sqm of public open space for the scheme.
166. The proposal would provide a total of 700sqm of public open space. This large space with play area incorporated would complement the proposed green space within the Devonshire Square site, thus enhancing the green oasis highlighted in the revised AAP. The proposed garden square extends across Sylvan Grove providing public realm improvements to the existing street and maximising the development's provision of public open space. Officers have worked with the adjoining site at Devonshire Square to agree a joint approach to 'Sylvan Gardens',

as both landowners would contribute to delivery of this new public open space. The proposed 700sqm is therefore not the total size of this space, but the share provided by this application. The total size of this public open space would be bigger when both schemes are complete, totalling 1,069sqm.

167. The applicant has also carried out an overshadowing assessment on the amenity space. These results depict both the direct sunlight without the Devonshire Square development in place and with the development in place. Regardless of the scenario assessed, both amenity spaces achieve 2 hours or more of direct sunlight to at least 50% of the area, indeed each of the amenity spaces achieve over 90% demonstrating full compliance with the BRE Guidance. This demonstrates that the communal amenity space and the public square would be well lit.
168. As there will be a shortfall of 395sqm, the applicant has agreed to make the contribution of £80,975 based on the 219 dwellings proposed (at a cost of £205 per sqm as set out in the AAP) and can be secured by the legal agreement.
169. New improved paving and links into and out of the site provide other kinds of public realm benefits including spill out space for the commercial uses and activity.

**Image: View of public space from Sylvan Grove**





**Image: Masterplan of buildings and open spaces of adjoining Devonshire Square.**



**Table: Playspace and amenity space proposed against policy requirement:**

	<b>Policy requirement</b>	<b>Proposal</b>	<b>Difference</b>
<b>Private</b>	2,190sqm	1,404sqm (not including those that exceed 10sqm)	-786sqm

<b>Communal</b>	50sqm + shortfall 786sqm of private amenity space (total 836 sqm)	363sqm	-473sqm
<b>Dedicated children's play space</b>	740sqm required by the June 2019 GLA calculator	740sqm	0sqm
<b>Public open space</b>	None is proposed on site in the draft 2017 AAP masterplan with site being shown as an infill development. The scheme would therefore have been expected to make an off site financial contribution to public open space in the vicinity equivalent to 1,095sqm	The approach to the revised AAP masterplan has changed in response to public consultation to require a new public open space to be created on site off Sylvan Grove. This would be co joined with a new public space on the adjacent Devonshire Square development. This scheme would contribute 700sqm to that new public space.	This scheme would still be required to make an off site in lieu financial contribution equivalent to 395sqm

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

170. Whilst there is a shortfall in communal amenity space, all play space is provided on site, and the scheme has responded to revisions to the AAP masterplan by

providing a new public open space, and associated indoor communal space which would be co-joined with the neighbouring public open space on the Devonshire Square development. This would directly benefit both new residents and the residents opposite at 8- 24 Sylvan Grove. The scheme would provide an attractive square that is publically accessible, creating improved permeability and connections for existing and future residents and workers.

171. Due to the shared core and the sharing of the communal amenity space, the applicant has agreed that service charge costs to social rent tenants would be capped within social rent cap levels and this would be secured by a s106 agreement.

#### Secure By Design

172. The Metropolitan Police design adviser considered that the scheme meet the requirements of Secured by Design (SBD) and suitable to achieve SBD accreditation. Continued liaison with a designing out crime officer will enhance this. The scheme ensures active frontages and would overlook the proposed public square for passive surveillance. Details of secured by design measures can be secured by a condition.

#### Noise

173. The site is located within the SIL with existing B class uses and the IWMF to the rear of the site. The proposed residential units when complete would adjoin the existing IWMF and the future residential development at Devonshire Square to the south. To the east of the application site is Nos. 8-24 Sylvan Grove which is a block of residential flats.
174. The dominant noise sources affecting the site of the proposed development are road traffic and noise associated with the IWMF. The council's Environmental Protection Team (EPT) has reviewed the proposals and having made some observations regarding the type of British Standards assessment, no objections are raised. The submitted noise impact assessment considers the impact associated with the current operation of the IWMF and within the scope of the scheme has employed good practice in the design such as the inclusion of winter gardens at the lower levels to provide mitigation to external balcony spaces. The applicant has also provided an outline façade noise mitigation strategy to meet BS8233:2014 and therefore council recommendations.
175. The noise break-in can be controlled by designing a suitable façade and ventilation strategy. This should attenuate the external noise level sufficiently to meet the internal ambient noise level requirements for residential dwellings Noise insulation recommendations have also been provided based on the predicted façade noise levels.
176. Paragraph 182 of the NPPF defines the Agent of Change principle as follows: "Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of



development permitted after they were established.”

177. It is considered that the proposed development would integrate well with existing businesses surrounding the site. It is noted that there is an existing church operating on the adjoining land, but church services operate once a week. EPT’s database shows no complaints about the church from the residents of 8-24 Sylvan Grove, some of whom are very close. Also, the church would be beside the commercial part of the proposed development, which would not be occupied by residents. The distance to the residential part of the development is more substantial and the lower 5 floors of residential will have winter gardens and so is better sound insulated, plus the glazing to deal with the IWMF should be sufficient to deal with the small church if it is still there when the building is finished. The proposed development would be of similar mix of uses and would be compatible with the future uses of the surrounding site.
178. An objection has been received from the adjoining IWMF operators Veolia. Their concern was that inadequate modelling of the impacts have been provided and that the introduction of the residential use would impact on their future operations.
179. The submitted noise impact assessment report has been reviewed by 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 (notwithstanding that the surrounding context would change in the near future).

#### Odour

180. In response to the submission and following further consultation with Veolia, the operator of the Southwark IWMF, immediately to the north of the application site, an additional assessment on odour has been undertaken to consider the likely odour impacts which could arise at the proposed development from the operation of the IWMF. The model has demonstrated that the proposed receptor locations are unlikely to experience odour impacts greater than those that are predicted to arise at existing ground level locations. The IWMF has existing operating conditions that require odour emissions to not give rise to significant impacts at existing receptors. EPT has also reviewed this and based on the modelling, it is considered that the introduction of new residential receptors as part of the proposed development would not put new receptors at an unacceptable risk of odour effects. The introduction of the winter gardens on lower floors would also provide mitigation against passing waste vehicles.

#### Conclusion on quality of accommodation

181. In summary, the proposed development would provide good quality of residential accommodation and would justify the high density of the scheme. The units are predominantly dual aspect and the scheme has:
- A number of larger unit sizes,
  - floor-to-ceiling height that exceed the minimum,
  - good outlook and views;
  - having good levels of daylight in this urban location; and

- having no more than 8 units per core per floor.

The units would have access to private amenity and communal amenity space and where this is not achieved on site a financial contribution for off-site improvements to local parks are to be secured. Mitigation measures are proposed to ensure noise impacts from surrounding uses are limited.

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

182. London Plan (2016) Policy 7.6 states that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and micro-climate. London Plan (2016) Policy 7.7 notes that large buildings should not adversely affect their surroundings in terms of overshadowing and solar reflected glare. Strategic Policy 13 of the Core Strategy 'High Environmental Standards' seeks to ensure that development sets high standards for reducing air, land, noise and light pollution and avoiding amenity and environmental problems that affect how we enjoy the environment in which we live and work. Saved Policy 3.2 of the Southwark Plan states that permission will not be granted for developments where a loss of amenity, including disturbance from noise, would be caused. The adopted Residential Design Standards SPD expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.

#### Impact of the proposed uses

183. The IWMF is to the north of the site, but the proposed mitigation measures to minimise noise and odour would ensure that the proposed development would not hinder their operations. It should be noted that the Devonshire Square development once complete would change the context of the surrounding site with a mix of retail, commercial and residential uses. The proposed residential uses in this application would also be more fitting with the recently built residential blocks on the opposite side of Sylvan Grove.
184. As part of the Devonshire Square development, a three storey office/light industrial building is proposed that would sit west of the main tower. This building (named 'Building E' is in outline as part of that application. Overlooking distances to the habitable rooms within the emerging scheme at Daisy Business Park would be sufficiently distanced to prevent harmful overlooking. The Design Code for the western elevation of Building E has been amended to mitigate potential overlooking from this Building E's two upper floors to the proposed lower residential floors in the proposed Daisy Business Park scheme, as a result of their proximity. The applicant has also omitted the glazing to the ground floor of this proposed commercial unit and replaced with knock-out brick features. This is in response to the submitted development proposals at Building E. It is the intention that these panels could be removed at a future date to return these areas to glazing, subject to how the outline development on the neighbouring plot is brought forward.

### Privacy and Overlooking

185. Nos. 8-24 Sylvan Grove is a block of flats and is the closest existing residential property located to the east of the site. This is at least 21m across the highway from the proposed development and would comply with the SPD.
186. In terms of privacy distances and impacts to the consented Devonshire Square scheme, this was discussed earlier. It was demonstrated that there would be acceptable distance between the proposed development and the consented residential blocks.

### Daylight and sunlight impact to existing residential units

187. A daylight and sunlight impact assessment was submitted with the planning application to assess the impact on nearby existing and future residential properties. The assessment utilised the following methodologies.

#### 25 degree line

188. To determine whether a neighbouring existing building may be adversely affected, the initial test provided by the BRE is to establish if any part of the proposal subtends an angle of more than 25° from the lowest window serving the existing building. If this is the case then there may be an adverse effect and a more detailed assessment involving the Vertical Sky Component of the affected window would need to be carried out.

#### Vertical Sky Component (VSC)

189. 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.

#### No Sky Line (NSL)

190. The second method is the No Sky Line (NSL) or Daylight Distribution (DD) method which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of 20% in the area of sky visibility, daylight may be affected.

#### Annual Probable Sunlight Hours (APSH)

191. 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.

#### Overshadowing, sunlight to amenity spaces

192. Open spaces should retain a reasonable amount of sunlight throughout the year. The BRE states that for an amenity space to “appear adequately sunlit throughout the year, at least half of the area should receive at least 2 hours of sunlight on 21 March”. Where this is not achieved, the difference between the area achieving 2 hours of sun on 21 March should be no less than 0.8 times its former value.
193. In relation to daylight, sunlight and overshadowing, Members should note that the BRE Guidelines are based on a suburban environment, and as such a degree of flexibility needs to be applied when considering an urban environment such as the application site. It is also important to note that the existing scale of development on the application site is exceptionally low for an urban location. As a result, the baseline conditions tend to exceed normal expectations for an urban area, and reductions would be expected to result from any development here. Paragraph 123 of the NPPF (2019) also states that:
- “Local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).”
194. The BRE Guidelines also state that residential properties warrant detailed consideration in terms of daylight and sunlight effects, but that properties of a commercial nature have a lower requirement. As such, the submitted daylight and sunlight assessments relate to existing residential properties only.
195. The neighbouring residential units that have the potential to be impacted in terms of daylight and sunlight are located at:
1. 8- 24 Sylvan Grove
  2. 5 Sylvan Grove
  3. 1-8 Hillbeck Close
  4. 9-16 Hillbeck Close
  5. 17-24 Hillbeck Close
  6. 97, 95, 93, 91, 81, 79 & 77 Manor Grove

Plan showing residential properties that have been assessed (numbered in blue)



196. It is acknowledged that the local context is developing rapidly with the development of the Devonshire Square scheme to the south and therefore there needs to be an assessment of cumulative impacts to neighbouring residential properties. The applicant has therefore carried out an assessment based on the existing context (without Devonshire Square in place) and an assessment including Devonshire Square to form the cumulative baseline against which any potential changes in light are considered. The BRE guidelines state that different targets may be used based on the special requirements of the proposed development or its location.

Image: Development in future context (Devonshire Square in purple)



### Assessment

197. When comparing the two contexts (existing baseline and cumulative) it has been demonstrated that the cumulative impacts would be the worse case scenario. As such, Officers have focused on this in this report.
198. Summary of VSC impacts  
 Twelve properties containing 311 windows and 195 habitable rooms have been assessed, 11 properties remain fully BRE compliant and only one property (8-24 Sylvan Grove) experiencing derogations from BRE Guidance. The VSC results show that 8- 24 Sylvan Grove located immediately east of the site would see some losses that deviate from the BRE guidelines. 231 windows serving 134 rooms facing the site have been tested. For the purposes of the analysis, and in accordance with BRE Guidance, the balconies were removed from the analysis to understand what effect the balconies have upon the amount of direct skylight being received.
199. 93 windows serve the 38 living kitchen diners (LKDs), of these 21 windows associated with 18 LKDs experience reductions in VSC of greater than 20% (which the BRE considers will be noticeable) and retained VSCs of less than 14%. Of these, 12 windows serving 11 LKDs have additional windows and retain reasonable VSC values for this urban location. The other LKDs would have only one window serving the room, but it has been demonstrated that it is due to the presence of side returns and/or their positioning recessed into the building, severely limiting any access to daylight. In accordance with the BRE, large relative reductions in these circumstances are unavoidable. Likewise in the kitchen dining rooms, 15 windows were tested and 9 will experience noticeable losses with low retained VSC values. Some of these are self-inflicted as with the above LKDs.
200. In terms of VSC levels for the bedrooms, BRE Guidance states that "...bedrooms should also be analysed although they are less important." There will be 42 windows experiencing reductions of greater than 20% and low retained VSC levels. However, it is noted that some of the windows are served by additional windows thus the rooms will maintain sufficient daylight levels for an urban setting.
201. Officers acknowledge that whilst some of the reductions are significant, the BRE guidance also recognise that reductions will be experienced more in urban areas of development, and the urban environment should be considered when interpreting the BRE guidance. That said, 70%of the windows within 8-24 Sylvan Grove assessed remain compliant. The large massing being proposed is at the western end of the site furthest away from this property and as the site is under-utilised any significant increase in site density has a disproportionate impact and means the BRE Guidelines must be applied in a pragmatic way with an inherent level of flexibility
202. Furthermore, the most significant derogations occur to windows which are recessed or are in close proximity to side returns, thus many of the low daylight levels are self-inflicted due to the design of this property.

203. Officers also note that the above results are of the cumulative scenario with Devonshire Square development in place. It is therefore observed that the addition of the Devonshire Square proposal to the context places a burden on the proposed development, increasing the number of non-compliant windows and intensifying the reductions of windows which experience noticeable reductions.
204. Officers requested an assessment on the levels of daylight that would be available on the Devonshire Square façade. Subsequently the applicant has undertaken a VSC façade study on the proposed Devonshire Square development. The facade study plots the proposed VSC level across the whole façade. It is observed that the facades predominantly enjoy VSC levels well over 17%. There are some exceptions, but this is as a result of the inset area and is primarily due to Devonshire Square's own design. Thus in conclusion the proposed development does not unduly restrict reasonable development potential of the Devonshire Square site.

#### Summary of NSL impacts against existing baseline

205. In the NSL cumulative test results, 4 rooms within 9-16 Hillbeck Close experience minor derogations from BRE Guidance. Due to the fully compliant reductions in VSC and minor nature of the NSL derogations it can be concluded that daylight levels will remain adequate for these rooms. 44 rooms in the 8-24 Sylvan Grove property would see more than 20% loss of daylight distribution.
206. Although the amount of skylight reaching the windows would be reduced, given the urban context of the site and the low level of existing development on the application site, these results are indicative of a relatively good retained level of daylight.

#### Conclusion on daylight impacts

207. The results of the daylight assessment do reveal that there would be a number of rooms at 8-24 Sylvan Grove that would not meet the relevant daylighting standards of the BRE. In these instances it is recognised that there would be a degree of harm to the daylight amenity of residents. It has been demonstrated that because of the design of 8-24 Sylvan Grove with its side returns this is part of the reason why the VSC levels would be low. The draft AAP sets out an expectation of some form of high rise development on the application site. On balance, Officers are satisfied that whilst there would be reductions in daylight and sunlight to neighbouring properties, which in a number of cases would be of a major adverse impact, this is to a degree a consequence of the design of the existing building as illustrated below.

#### Sunlight

208. The BRE guide states that if a window can receive 25% of summer sunlight, including at least 5% of winter sunlight between the hours of 21 September and 21 March, then the room would be adequately sunlit.
209. Of the 33 rooms for assessment, only 4 rooms experience a derogation from the BRE guidance and these are located in the 8-24 Sylvan Grove development. Three of these are westerly facing bedrooms, which the BRE considers to be of less



importance. That said, each room will receive between 9-18% APSH which in the circumstances is considered acceptable.

210. Overall, it is considered that the sunlight effects to the neighbouring residential properties would be moderate by virtue of the retained annual APSH values.

#### Overshadowing

211. The BRE guidelines state that for an amenity area to appear adequately sunlit throughout the year, at least 50% of the area should receive at least two hours of sunlight on 21st March.
212. All site facing amenity spaces associated with 8-24 Sylvan Grove have been assessed based on the cumulative scenario (Devonshire Square development in place) and equate to 50 terrace and balcony areas in total. Based on that scenario and without this development in place, 39 of the 50 amenity spaces currently do not achieve the BRE recommended target of at least half of the amenity space receiving at least 2 hours of direct sunlight on 21 March; 30 of these spaces currently achieve 0% direct sunlight.
213. Many of the low existing values are attributable to the design of the property at 8-24 Sylvan Grove with numerous balconies being set into the building or behind significant architectural detailing and side returns, or are overshadowed by the balconies above them. The results from the proposed scenario with the development in place indicate that none of the of the amenity spaces experience additional reductions of direct sunlight as a result of the development, which therefore remains fully compliant for overshadowing assessment.

**Image: Example of balconies at 8-24 Sylvan Grove**



### Conclusion on daylight, sunlight and overshadowing

214. Overall, the main impact of the scheme is to the daylight levels at 8-24 Sylvan Grove. The results of the daylight assessment do reveal that there would be a number of rooms at 8-24 Sylvan Grove that would not meet the relevant daylighting standards of the BRE. In these instances it is recognised that there would be a degree of harm to the daylight amenity of residents. It has been demonstrated that because of the design of 8-24 Sylvan Grove with its side returns and balcony design/layout is part of the reason why the VSC levels would be low. As a consequence and on balance, Officers are satisfied that whilst there would be reductions in daylight and sunlight to neighbouring properties, these are acceptable.

### **Transport issues**

215. 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 establish maximum parking standards.
216. Southwark have recently adopted the Movement Plan, a people, place and experience approach to transport planning. This application has been assessed on how we will contribute to the delivery of the Movement Plan.
217. The Mayors Transport Strategy (MTS) includes three strategic challenges that are of significant importance to assessing this application.
- Vision Zero
  - Healthy Streets
  - Air Quality
218. The submitted Transport Assessment (TA) is considered to provide an adequate appraisal of the relevant transport and highway related matters including an assessment of the potential for journeys to be made by sustainable modes of transport as well as detailed estimates of vehicular trips resulting from the development.
219. Existing condition  
To the south of the site is currently occupied by a hardstanding car park accommodating approximately 47 car parking spaces and is accessed off Sylvan Grove. Sylvan Grove is a two-way carriageway cul-de-sac which has access to Old Kent Road and terminates at the Daisy Business Park. The site is not within a Controlled Parking Zone (CPZ). It is subject to a 20mph speed limit with traffic calming in the form of speed bumps. Single red line restrictions at the southern end of the road extend from Old Kent Road and double yellow line markings are present on the remainder of the carriageway. An on-street loading bay is also located opposite the site and Car Club bay is also located 50 away.

### Accessibility and trip generation

220. The site has an official PTAL (public transport accessibility level) of 3, which is moderate access to public transport. The nearest bus stop is approximately 200m from the site on Old Kent Road. The PTAL rating is likely to increase however with the Bakerloo Line extension that is envisaged to be located on the Toys R Us site to the south.
221. The existing trip generation records a daily average of 36 and 50 trips in the AM and PM hours respectively. The modal split for those trips indicates that the majority of proposed trips to and from the site would be undertaken by bus and the remaining trips are anticipated to be made primarily by underground, rail and active modes of travel. The proposal estimates daily vehicular trips of mostly related to servicing and delivery of 32. Therefore, the proposed development will not lead to a significant adverse impact on the local highway network.

### Car parking

222. The proposed development would essentially be car free, bar the 6 disabled parking bays for the residential element of the scheme. It is noted that the GLA made comments regarding the level of disabled parking bays being proposed and sought for an additional space for the residential element and another for the commercial element. All proposals for off-street arrangements have been tracked and will enter and exit safely from the building. The provision of 6 disabled bays which would provide 2.73% of the number of wheelchair dwellings is considered to be reasonable. If these bays are not required for disabled residents the bays could be prioritised for servicing and/or extending cycle parking provision and not for other residents for private car parking.
223. There is an existing car club bay along Sylvan Grove and it is expected that future residents of this proposed development would be offered 3 years membership.
224. It is considered reasonable and appropriate to require a s106 obligation to ensure that no future residents or occupiers of the proposed development could obtain resident parking permits for any future CPZ. The council's programme for CPZ's identifies this area to be consulted within the next year so should be in place before occupation. It is also recommended that a condition to ensure all marketing of the development promotes car-free living, to ensure the occupants are well aware they will not be entitled to permits.

### Servicing

225. Servicing and deliveries for the proposed development will be undertaken on-site at ground floor level from within the undercroft parking and servicing area. The servicing area has been configured to include a turning head, and sufficient loading space to accommodate 2-3 delivery vehicles at a time. Building management will ensure refuse containers are transported from the waste stores to the servicing yard for collection from Sylvan Grove.
226. On-site servicing is provided for vehicles up to an including 7.5T Box Vans (8m length). In the infrequent event that servicing is required by larger vehicles, servicing could also be undertaken on-street on Sylvan Grove. The council is

considering the provision of on -street loading bays bearing in mind the three developments on Sylvan Grove. The exact location of new bays and the re-location of existing will be subject to the S278 agreements.

227. Sufficient information has been provided to reasonably conclude that the servicing yard, with capacity for 2-3 vehicles at a time, will be able to accommodate a demand of up to 30-32 deliveries per day
228. In order to ensure that any on-street servicing and deliveries do not negatively impact on the highway network, the council is recommending that applicants in the OKR OA enter into Delivery Service Plan Bonds (DSP) against their baseline figures for all daily servicing and delivery trips. These bonds would be calculated at £100 per residential unit and £100 per 500 sqm of non-residential floor-space. In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, this is not intended as a financial penalty, but as a means of mitigating any harmful impacts from the proposed development and ensuring a better quality of life for current and future residents. As such, it is considered to meet the CIL Regulations 122 test, in that it would be:
- (i) necessary to make the development acceptable in planning terms;
  - (ii) directly related to the development; and
  - (iii) fairly and reasonably related in scale and kind to the development.
229. The proposal is for the management of the new development to monitor the daily vehicular activity of the site both commercial and residential, quarterly for a period of 2 years from 75% occupancy. If the site meets or betters its own baseline target the bond will be returned within 6 months of the end of the monitoring period. If the site fails to meet its own baseline the bonded sum will be made available for the council to utilise for sustainable transport projects in the ward of the development. The council will retain £1,600.00 for assessing the quarterly monitoring. The bond in this instance would be £22,500 based on the 219 residential units and 2,986sqm of non-residential floorspace. The applicant has agreed to the contribution which can be collected via the legal agreement.

**Table: Delivery Service Bond**

Type	Quantum	Bond Amount
Residential	219	£21,900
Non Residential	2,986 sqm	£600
Daily Trips	Approximately 32	£22,500

230. There is a sub-station proposed on the south-west corner of the site with doors opening outwards onto a private footway area that is not fenced off to prevent public access. It is considered further details could be secured via a condition for this part of the design.

#### Public Transport

231. The site has convenient access to the numerous bus routes that can be accessed on the Old Kent Road. As a borough the council agree with TfL that bus services

will need to be increased in the area ahead of the Bakerloo Line extension (BLE) to accommodate the demand generated by additional homes and jobs generally in the Old Kent Road area in advance of the opening of the planned BLE which, subject to the granting of powers and availability of funding, would be 2029/2030 at the earliest. The requirement for TfL to provide evidence to prove both previous contributions has been spent appropriately and the evidence for the further draw is the fairest way this could be managed. The proposal is that there is a maximum cap for TfL to call on which is £2,700 per unit. This will be able to be requested in stages between 3 - 5 years.

232. The site is within 1km of Queens Road Peckham and South Bermondsey station and trains connect to London Bridge, Waterloo, Elephant and Castle and New Cross via bus. Within the next ten years the area is likely to benefit from the BLE, this site will be in walking distance of both proposed new stations. Highways and transport infrastructure requirements are covered under CIL and the public highway improvements in the OKR Action Area would be delivered from a combination of land gain, s278 and CIL.

#### Walking and public realm

233. The cumulative applications within the Old Kent Road AAP area has resulted in a number of Pedestrian Environment Review System (PERS) audits as well as Activity Zone audits being carried out in the area from December 2017 to just before the COVID 19 lockdown. Officers are satisfied that this application reflects these.
234. The Healthy Streets approach seeks to inform design, management and use of public spaces in order to place people and people's health at the forefront of development decisions. The submitted TA provides an assessment against the Healthy Streets indicator. The development will provide a car-free development with extensive areas of landscaping both on site and through improvements to Sylvan Grove and provides a compliant provision of cycle spaces.
235. The site will be in close walking distance of the proposed Livesey Park via the proposed new access road and Devonshire Square. The site is also within a short walk of Brimington Park and of the proposed new linear park. The public realm area will extend across Sylvan Grove, which will be treated with the same paving so the adjacent residential buildings are able to take advantage of this new space.
236. The improvements to the pedestrian environment as part of the development are anticipated to encourage active travel and the close proximity of a variety of new open space and public realm, supported by the application will offer good quality walking options in the area.

#### Cycle parking

237. The site is located close to Quietway 1 and will be in close to the proposed new linear park. TFL have proposals for healthy streets for the Old Kent Road and the borough is progressing the Rotherhithe to Peckham cycle route which runs through Ilderton Road into Brimington Park all in close proximity to this site. (All projects subject to delays related to TfL funding priorities affected by Covid 19).

238. London Plan standards require the following residential cycle parking provision:
- Long stay:  
 1 No. space for studio or one bedroom residential units  
 2 No. spaces for all other residential unit
- Short stay:  
 1 No. space per 40 dwellings
239. London Plan standards require the following commercial cycle parking provision (worst case scenario being B1a class use):
- Long stay:  
 1 No. space for 75sqm
- Short stay:  
 1 No. space per 500sqm
240. The applicant has revised plans to show an increase in the level of cycle parking. The scheme now provides a total of 380 cycle spaces for the residential use and 42 cycle spaces for the commercial use on the first floor level. This satisfies with the GLA's request and in accordance with adopted London Plan standards.
241. Some Sheffield stands will also be provided such that at least 9% of all spaces are accessible. The short stay cycle parking will all be provided in the form of 18 Sheffield stands located within the public realm adjacent to the building and would be convenient and easily accessible. There will be a condition for detailed design of cycle parking and its relationship with the public highway.
242. The s106 Agreement will include a contribution towards the delivery of the first phase of extension of the Santander Cycle Hire Docking station of £50 per residential unit and is considered a benefit.

#### Construction management

243. An outline Construction Logistics Plan has been submitted and has been developed to provide the management framework required for the planning and implementation of construction activities and management of traffic. Both highways and environment officers have reviewed this and do not raise any objections. However, it is considered reasonable and necessary to require a final version of the CEMP through the s106.
244. Due to the cumulative impact of construction in the Old Kent Road AAP area a Contribution of £40 per residential unit will be required to enable the highway authority and EPT to manage this. This equates to £8,760 for this application and will be secured through the s106.

### Conclusion on Transport and Highways

245. The development is supported because it provides good quality pedestrian and cycle permeability and will contribute to delivering some of the Movement Plans 9 missions, Vision Zero and Healthy Streets. It would have appropriate management to reduce the impact of servicing and delivery, subject to the s106 obligations and conditions.
246. The development of this site would provide the necessary pedestrian connections through the site and to the remaining of the Devonshire Square site delivering the aspirations of the AAP. It would open up routes to connect to Ilderton Road, Old Kent Road and east towards Sylvan Grove and west towards the gasworks.

### **Design issues**

247. The proposed development involves the redevelopment of the site to provide a new building ranging from 5 to 32 storeys in height. The lowest section is formed by retaining an element of the existing building on site, which provides a two storey extension of the building massing to the southwest. The new building base is formed by a four storey podium that is essentially an 'L' shaped block, which extends the existing building, wrapping around the public open space. Above this rises an additional twenty eight storeys as a rectangular extrusion forming the residential tower.
248. The emerging policy in the draft OKR AAP sets out a vision for the Old Kent Road that would see substantial change in the area over the next twenty years, whilst seeking design that responds well to its existing character and sense of place. The draft OKR AAP does however identify buildings of townscape merit and architectural or historic interest around the site and this is discussed further in the report below. The draft AAP identifies the site as an appropriate location for a tier 3 tall building of up to 16 storeys with a building reducing in height towards the south of the site. The draft AAP didn't show a public open space on this site.

**Image: Stations and Crossings Strategy from draft OKR AAP**



249. Although the proposed building exceeds the tier 3 building and at 32 storeys will become a tier 1 building, this is considered in the context of changes to the AAP masterplan which includes the creation of new public open space on Sylvan Grove.. The tallest building proposed on the Devonshire Square site and immediately adjoining this application site would be up to 39 storeys in height. The proposal here would be seen in the context of the adjoining development. The height of the buildings in the Devonshire Square scheme was considered acceptable and given the proximity of that site to a new tube station and park (150m to each) and given the townscape analysis which shows the scheme would form a good compositional arrangement with neighbouring sites and deliver the Stations and the Crossings strategy of the draft AAP, 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.
250. The emerging design policy in the NSP includes P13, Design Quality and P16 Tall Buildings. P13 states that development must provide, amongst other things, high



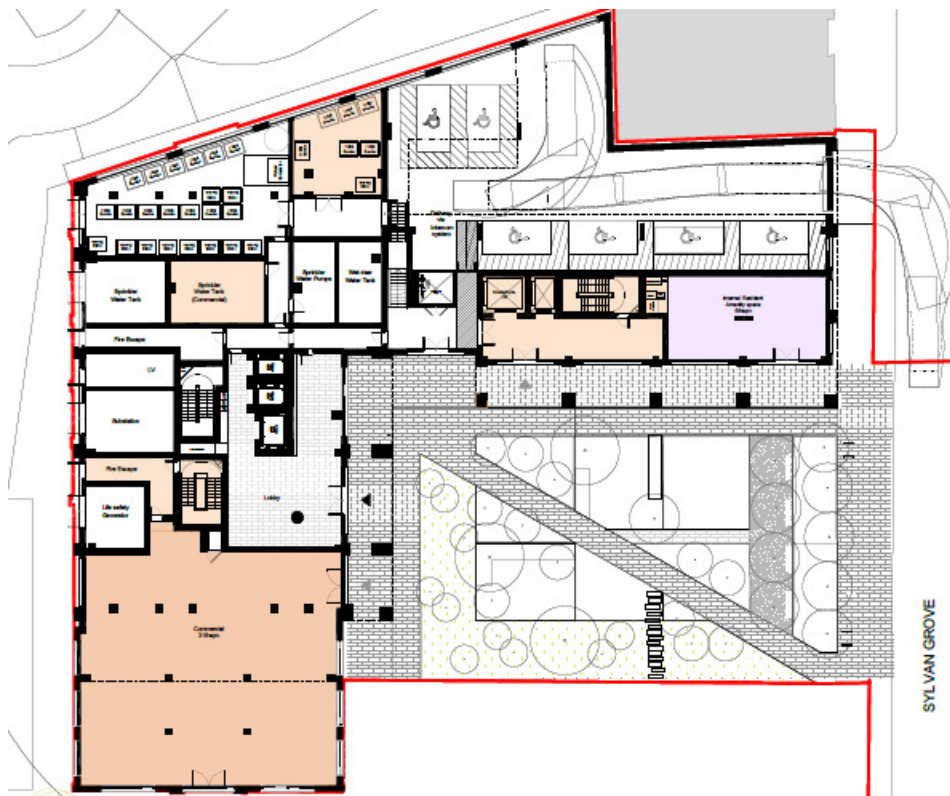
standards of design with appropriate fabric, function and composition. P16 sets out a series of tests for tall buildings (defined as significantly taller than surrounding buildings or their context). It also states that the highest tall buildings will be located in areas where there is the greatest opportunity for regeneration, including Opportunity Areas, such as the Old Kent Road.

251. 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.

#### Site layout

252. The proposed site layout is not that dissimilar to what exists on the site which comprises a low-rise L-shaped building wrapping part of the existing car park. The new building would wrap around the new public square, ensuring active frontages overlooking this space. This ensures that routes and connections can be open up from east to west from Sylvan Grove to the gasworks. The position of the new public square would be visible and easily accessible from Sylvan Grove and it has been designed to ensure that the public realm is maximised with the Devonshire Square in place.

#### **Image: Ground floor site layout**



253. The development allows for part of the existing structure to be retained on site and this will be reworked into the new ground floor. The arched colonnade extends to form the elevation to the north and west of the building. Active frontage is delivered onto Sylvan Grove, onto the new Square and onto the westerly elevation.
254. The commercial and residential entrances are well overlooked and are easily distinguished. The vehicular access to the car park and servicing area located on Sylvan Grove would be located away from the entrances, minimising any conflict with pedestrians.
255. The western elevation would adjoin the stand alone 3 storey building E from the Devonshire Square scheme, but the building would allow for a pedestrian route through.

Height, scale and massing and consideration of tall buildings

256. The total height at 32 storeys does exceed that outlined in the draft AAP height strategy for the site. However, as explained above, this is in response to the changing AAP masterplan . The townscape analysis shows the scheme would form a good compositional arrangement with neighbouring sites and in particular the Devonshire Square scheme which has a 39 storey building facing the application site. It is important to look at this scheme not only in isolation, but how this fits in with the wider Devonshire Square development and the emerging context of other cumulative developments. It is acknowledged that the height of the buildings proposed marks a step change in the scale of development in the area. The height and massing strategy of the Devonshire Square development was supported in terms of creating a consistent shoulder height on Old Kent Road, with increases in height towards the centre and Devonshire Grove. This modulation of height was considered positive in townscape terms.
257. The proposed development in this application has been arranged to allow for as much space between them as possible, ensuring that they would not appear to coalesce when viewed from a distance. This also ensures that good levels of sunlight and daylight would reach the public realm. It is considered that the relative heights and the way in which they would be distributed across the site along with the emerging developments to the south would result in a well articulated composition of towers that would define the ground floor public square.

**Image: Cumulative development in future context**



258. Notwithstanding the Devonshire Square development, the proposed building at 107.8m AOD would be substantially taller than those in the existing surroundings. As such, they would be defined as tall buildings in the adopted London Plan (2016). Policy 7.7 of the 2016 London Plan, 'Location and Design of Tall and Large Buildings', states that tall buildings should be limited to sites in the Central Activity Zone, Opportunity Areas, areas of intensification or town centres that have good access to public transport.' Furthermore, London Plan Policy 2.13 requires development in Opportunity Areas to optimise residential and non residential output densities, meet or exceed minimum housing and employment guidelines and support wider regeneration objectives. Annexe 1 of the 2016 London Plan sets out the specific requirements for the OKR OA, identifying it as having significant potential for residential- led redevelopment. As such, it is considered that the OKR OA is, in principle, an appropriate location for tall buildings which optimise housing delivery and regeneration benefits. The proposed development is considered to achieve both, whilst also meeting the other requirements of London Plan Policy 7.7, which are as follows:

- Generally be limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport;
- Only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building;
- Relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level;
- Individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London;
- Incorporate the highest standards of architecture and materials, including sustainable design and construction practices;
- Have ground floor activities that provide a positive relationship to the

- surrounding streets;
  - Contribute to improving the permeability of the site and wider area, where possible;
  - Incorporate publicly accessible areas on the upper floors, where appropriate;
  - Make a significant contribution to local regeneration;
  - Not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference; and
  - Not impact on local or strategic views adversely.
259. The proposed tall building would be within an opportunity area. The character of the area would not be adversely affected by the scale, mass or bulk of the tall buildings proposed because this area is not generally considered sensitive to change of this type. With the exception of the western wing of the existing building, it is considered that the remaining industrial building and the open car park is not worthy of protection. Its replacement with a scheme of this high quality architectural and urban design is considered a significant public benefit of the proposals.
260. In line with the draft OKR AAP, the design of the tall building would be exemplary, with careful consideration of their impact on the skyline. The separation distance between the other consented buildings in Devonshire Square successfully enables the development to provide amenity and play space on the roof levels, with the distances between the buildings permitting daylight to penetrate in between the blocks to proposed residential properties and the new square. The proposed building together with the tower at Devonshire Square would improve legibility and marking of the new public square.
261. The proposed tall building and its layout and improved urban grain would create active frontages, increased connectivity and permeability and contribute to the creation of a new public open space. As a result of this cluster of spaces and the relationship with the emerging surrounding developments it is likely that the proposed development would become a focus of activity for both existing and new communities.
262. It is considered there would be no harm to strategic and local views. This is discussed in more detail below.
263. It is considered that the proposals demonstrate the highest standards of architectural design and incorporate the highest quality materials and this is discussed further below in this report. In order to secure this design quality, planning condition requiring detailed drawings, material samples and full scale mock ups are recommended.
264. The proposed development would not incorporate any publicly accessible areas on the upper floors. The access to the upper floors to the general public may raise Secure by Design issues and therefore not appropriate in this instance. It is noted however, that the London Plan (2016) only requires this “where appropriate”. A communal terrace for the new residents would be introduced, giving a soft, green layer of articulation to the appearance of the buildings.

265. The contribution that the scheme would make to local regeneration would be very significant as has already been identified throughout this report. The impact of the proposed development on microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference are assessed and presented elsewhere in this report. In each case it is concluded that there would be no significant adverse impacts.
266. As the most recently adopted document in the Local Plan, and the only document adopted after the Old Kent Road was designated as an Opportunity Area, it is considered that these London Plan (2016) policies in relation to tall buildings are more relevant than those in Southwark Plan Saved Policy 3.20 dating from 2007. Nevertheless, the proposed development has also been assessed against the requirements of this saved policy. Saved Policy 3.20 requires any building over 30 metres tall to ensure that it:
- Makes a positive contribution to the landscape; and
  - Is located at a point of landmark significance; and
  - Is of the highest architectural standard; and
  - Relates well to its surroundings, particularly at street level; and
  - Contributes positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.
267. As discussed above and elsewhere in this report, the proposed development would make a very positive contribution to the landscape through the creation of a new public spaces, new routes through the site and high quality landscaping (to be secured by condition). It provides and completes a point of landmark significance by announcing the new public square with a building that would be of high standards of architecture.
268. In conclusion on height, scale and massing, the proposed buildings would be consistent with the draft OKR AAP. Officers are satisfied that this proposal complies with saved Policy 3.20, it is of high architectural quality, contributing positively to its street-scene and the London skyline with its highly articulated and stepped profile.

#### Architectural Design and Materiality

269. Sylvan Grove sits within OKR 18 and adjacent to OKR 13. Both of these plots of the OKR AAP contain valued heritage assets which contribute significantly to the Old Kent Road's industrial character. On this site is a Victorian warehouse building mainly characterised by its arched windows and triple pitched gable which faces south towards Old Kent Road. The proposal's appearance draws upon both of these retained features as well as the strong Victorian and industrial heritage of the wider Old Kent Road area. The building would be of a high architectural quality. The design includes retaining the southern part of the existing building and refurbishing it and incorporating it into the new development.. The arches of the existing structure have informed the design of the colonnade that wraps around the new public space forming a solid base to the building. The colonnade effectively creates a double height base to the building with a set back ground and first floor. It ties together the elements of commercial space and the residential entrance to the base of the tower.

The arched colonnade extends to form the elevation to the north and west of the building.

270. The proposed building would be of masonry character, referencing the solidity and robustness of the existing architecture found in the area. The historic industrial structures and buildings of the Old Kent Road Area, such as the gas holder and warehouse buildings, have strong horizontal emphasis and clear layering in their structure. The proposal replicates this layering logic through establishing a clear, double height base, a 3 storey order throughout the main body of the tower, and finishing with a crown element to express the top of the tower. Arches are employed as the main motif and structural element in the proposal. They are used to delineate the primary layered order of the building. This 3 storey order is then punctuated by a suborder of white stone lintels which distinguish each story. In keeping with the principles of the AAP for taller buildings in this area a strong vertical emphasis is adopted throughout.
271. From the portion of the building which is demolished, the intention is to reclaim as many bricks as possible and use them in the base of the building. These reclaimed bricks would be mixed with new to create a tone similar to that of the existing warehouse. Moving up the facades from the brick base, the materials and textures will vary, but a consistent colour tone will be maintained. This tone is maintained in any detailing by using terracotta or red brick moulding. White lintels or sills are often used as an accent to the tones of the red brick. They follow the common Victorian palette of red brick, with detail around features expressed using moulded terracotta elements. Following this logic, the residential tower is clad with textured and moulded terracotta which compliments and harmonizes with the colour of the brick base. The commercial building is clad predominantly in brick. The increased floor to floor heights of the ground and first floors help to celebrate the base of the building and its entrances.
272. The crown is formed by the final 2 floors of the residential tower. It is expressed using a dark grey terracotta as opposed to the warm terracotta tones of the main body of the tower. The quality of these materials including brick colour would be assured by planning conditions requiring detailed design drawings and samples of all facing materials.

**Image: Design and material of residential tower**



Design Review Panel

273. The Applicant presented a relatively early version of their proposals to the Southwark Design Review Panel (DRP) in July 2018. This was presented alongside the Devonshire Square scheme due to its proximity and relationship. The Panel were generally supportive of this proposal. Nevertheless, they raised a number of comments. The comments the Panel made, and the changes proposed to the scheme in response are summarised below. Members should however note that the scheme has changed since the pre-application discussions.
274. Urban form and arrangement:  
The Panel asked the design team to define a hierarchy of spaces that considers the nature and character of both Devonshire Grove (likely to remain a heavily trafficked route to and from the Waste facility) and Sylvan Grove. They asked the applicant to take into account the prevailing desire lines around the site, the potential new spaces in the site (including the Daisy Business park courtyard). The Panel asked the two teams to reconsider how the arrangement of the two towers in particular has affected the public spaces and routes around this site including the courtyard on Daisy Business Park. The Daisy Business park site is potentially affected by the location of the tower on this site because it takes up the southern flank of their courtyard. The Panel questioned the appropriateness of allowing car parking within the courtyard of the Daisy Business Park as this could be an effective enhancement



of the public realm across both sites. They urged the designers to work together to establish a collective vision for the two sites and to use the hierarchy of spaces and routes to define the arrangement of the built form and the location of the two towers.

275. Officer response:

The scheme has changed since the presentation to the Panel allowing for a larger public open space between this development and that proposed at Devonshire Square. The distance between the two towers have increased allowing for greater privacy, The car park is now located within the building on the ground floor. Desire lines have been incorporated by proposing a diagonal route through the proposed square.

276. Public space:

The Panel encouraged the applicants to fundamentally review the location of the public space and develop a public space that works across both sites. This will in turn inform the optimum arrangement of buildings and routes across the site including the Daisy Business park courtyard.

277. Officer response:

The applicants for both sites have since reviewed the public spaces. The proposed square in this application would allow for routes through the two developments.

278. Existing warehouse building:

The Panel noted the designer's ambition to retain the warehouse façade on Daisy Business Park but questioned how effective this will be given that such a small fragment of the façade will be retained. The retained façade at the base of the tower has an air of tokenism and introduces further constraints on the ground plane and urban realm. In order for it to be successful, this historic feature of the site will need to be considered in the context of the overall vision for both sites.

279. Officer response

It is considered that the architects have further developed the design and the retention of the existing building remained a key driver for the elevation design and appearance of the building.

280. Architecture:

The Panel highlighted that the two towers, due to their proximity, would be seen in the context of each other. Whilst they did not suggest a common architectural language for both towers, they felt it was important in developing the detailed design of the towers, that they are considered as a pair. The tower on Daisy Business Park is likely to be a significant feature in the urban setting and as such it could benefit from further development before it can be considered to be 'exemplary' in its quality of design. They also raised concerns about the predominance of studios and 1-bed units and the lack of communal amenity in the development as a whole.

281. Officer response:

As explained above, the detailing of the building and form is considered to be of high quality. The design has evolved since then. The number of studio flats have been reduced to no more than 5%. . Play space has been prioritised, although this



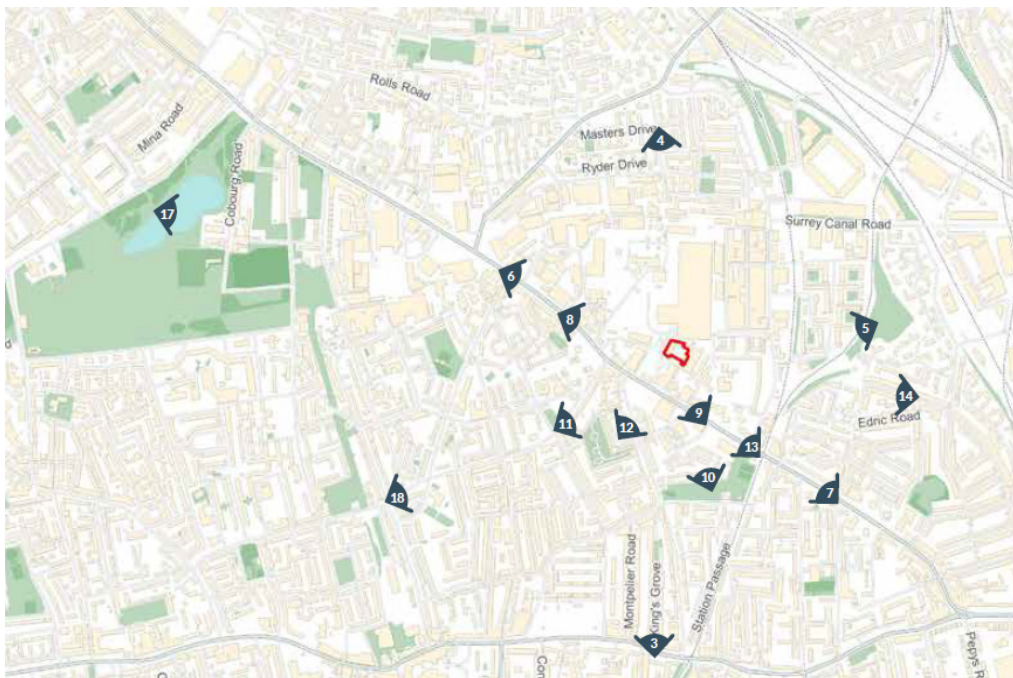
does still result in a shortfall of communal space. .

282. The Panel noted that key tall buildings technical studies had not been prepared or presented to them. These studies should inform the design, help to influence the arrangement of land-uses and define the optimum locations for new public spaces and routes.
283. Officer response:  
The design has evolved since then and the technical studies have been submitted as part of the full application. These demonstrate that there would not be significant harmful effects as explained elsewhere in the report.

### **Townscape and Visual Impact Analysis (TVIA)**

284. The submitted assessment considers the impact of the proposed scheme from a number of different viewpoints in the surrounding area as detailed in the following paragraphs.

#### **Image: View locations (excluding views 1 and 2)**



285. Officers have reviewed the TVIA and the views presented and will provide an analysis and comment on those views that are most sensitive, have high heritage and townscape significance or prominence in this report.
286. View 1 Kenwood (LVMF 3A.1)  
The view is identified as an important panorama of London in the London View Management Framework (LVMF) and seeks to protect the skyline silhouette of St Paul's Cathedral. The LVMF views likely to be impacted upon by the proposed development are 2A.1 from Parliament Hill and 3A.1 from Kenwood. The proposed

development will appear to the west of St Paul's Cathedral and would not impact the skyline silhouette of the Strategically Important Landmark. The proposed development would have a negligible impact on the view.

287. View 2 Parliament Hill (LVMF 2A.1)

View 2 is situated at the summit of Parliament Hill. The proposed development will be screened by the Guy's Hospital tower and would not impact the skyline silhouette of the Strategically Important Landmark. The proposed development would have no impact on the view.

288. View 5 Bridgehouse Meadow Park

This view is located at the western edge of Bridgehouse Meadows Park and the viewpoint is looking west, approximately 550m from the site. Bridgehouse Meadows Park is designated by Lewisham Council as a 'Public Open Space'. Within the backdrop there are there also glimpses of the Grade II listed No 13 gasholder. The proposed development would be visible in the backdrop of the view. The proposed development has slender proportions that will create an attractive skyline profile. In the wider context, it will be seen as part of the cluster around the new station to the Bakerloo line extension. In the cumulative context, the approved developments would be visible in the background. The schemes will demonstrably change the skyline in views south, marking the transformative change envisioned in the Opportunity Area.

289. View 6 Old Kent Road looking south east

View 6 is located along Old Kent Road, east of the junction with St James's Road. The foreground of the view comprises of Old Kent Road. In the middle ground, the Grade II listed No 13 gasholder is perceptible above interposing development. The proposed development would be visible in the backdrop of the view, north of Old Kent Road but it is designed with slender proportions that will create an attractive skyline profile. The duration of the view along Old Kent Road is long due to its historic Roman alignment and the proposed development will form a prominent feature, visible over a significant distance. The scale of development will mark the public square at ground floor. In the wider context, it will be seen as part of the cluster around the new station to the Bakerloo line extension. As such, it will reinforce the proposed hierarchy of buildings, places and streets identified in the AAP. In the cumulative context the proposed Development would have a negligible impact on the view as it would be largely occluded by cumulative development in the foreground, including Ruby Triangle.

290. View 7 New Cross Road, junction with Pomeroy Street

The view includes a cluster of the Grade II listed buildings including Carlton Cottages and 3-15 New Cross Road. The view demonstrates that the proposed development would be almost entirely occluded by the collection of point blocks in the Tustin Estate. The proposed development may be glimpsed through the gaps between buildings in the Estate, but would have a negligible impact on the composition of the view or the experience of receptors travelling west along New Cross Road.

291. View 8 Old Kent Road in front of Christ's Church

In the middle ground of the view, the tall and large Grade II listed No 13 Gasholder is visible and forms a landmark within the frame. The proposed development will be

visible to the north of Old Kent Road. In views travelling east, it will contrast with the rotund shape of the gasholder. The contrast between the two, slender and broad, perforated and solid-masonry, will be an attractive juxtaposition. In the wider context, it will be seen as part of the cluster around the new station to the Bakerloo line extension. As such, it will reinforce the proposed hierarchy of buildings, places and streets identified in the AAP. In the cumulative context the proposed development would be seen in conjunction with Devonshire Square. The scale (height) of the proposed development would be subservient to the Devonshire Square scheme, in accordance with the hierarchy of buildings, places and streets identified in the AAP.

**Image: View 8 from Old Kent Road (cumulative with Devonshire Square)**



292. View 10 Brimington Park

This is located on the southern edge of Brimington Park looking towards the north. The foreground of the view is characterised by a grassed area interspersed with mature trees. Within the middle ground 1 to 50 Clifton Crescent front onto the residential street of Clifton Crescent. The Victorian stock brick terraces are between two and three storeys and are statutory listed at Grade II. The proposed development would be visible in the backdrop of the view. In the cumulative context the proposed development would be partly occluded by the proposed Devonshire Square, located to the immediate south-west of the Site. The developments would mark the emerging cluster identified in the AAP.

293. View 12 Caroline Gardens

The viewpoint is located within the Caroline Gardens Conservation Area which contains a series of listed buildings which are associated with the Caroline Gardens estate and Licensed Victuallers' Benevolent Institution. The proposed development

would be partially visible in the backdrop of the view, with the lower half of the building being obscured by interposing development and mature trees. The proposed development has slender proportions that will form an attractive skyline feature and will improve the visual amenity of the view with high quality architecture. In the wider context, it will be seen as part of the cluster around the new station to the Bakerloo line extension. The cumulative context demonstrates further significant change to the view. The variation in scale would form an attractive skyline profile. The proposed development would be seen in conjunction with Devonshire Square. The scale (height) of the proposed development would be subservient to the Devonshire Square scheme, in accordance with the hierarchy of buildings, places and streets identified in the AAP.

**Image: View from Caroline Gardens**



Borough Protected Views

294. Although of limited weight, the draft NSP, Policy P21, 'Borough Views', states that development must preserve or where possible positively enhance the borough views which have been identified. The Borough View potentially impacted on by the proposed development is the linear view of St Paul's Cathedral from Nunhead Cemetery.
295. The assessment of this view is that the proposed development would be obscured by tree branches to such an extent that it would be virtually indiscernible, even in winter. It is considered that there would be no harm to this view.

**Heritage and townscape considerations**

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

296. The application site does not sit in a conservation area and it contains no listed buildings. The nearest designated heritage asset is the Grade Gasholder No. 13. The existing buildings and structures on the application site share no historical



relationship with these listed buildings and are not considered to contribute positively to their setting. The public square will open up new routes across Devonshire Square that will improve the functionality of the wider area and the wider benefits brought about has the potential to improve the setting of the gasholder and help secure its long-term conservation. Whilst there are other listed buildings further afield from the site, these would be some distance from the proposed development and would be screened by the emerging tall buildings in the Opportunity Area.

297. There are no conservation areas in the immediate vicinity of the site, but Caroline Gardens Conservation Area and Hatcham Conservation Area are nearby and would have views of the development. The submitted impact assessment demonstrates that in the emerging cumulative context the proposed development would preserve the setting of the Caroline Gardens Conservation Area and the listed buildings within its boundary. Due to the separating distance between the Hatcham Conservation Area and the site and the limited visibility and the slender proportions of the proposed development, the proposed development would preserve the setting of the Hatcham Conservation Area.
298. Although of very limited weight, the draft OKR AAP also identifies buildings and features of townscape merit and buildings of architectural or historic interest. The western wing on the existing building has been identified as a building of townscape merit. The building is constructed of red brick with painted south elevation. The south gable end is not fenestrated, but has some limited townscape interest due to the profile of its M-shaped roof. In contrast, the western elevation is not fenestrated and has no features of architectural interest. The eastern elevation comprises arched windows, which feature gauged brick window headers. The applicant has acknowledged the principles of the AAP vision and sought to incorporate the character of the existing southern gable as part of the development. The location of the warehouse has informed the proposed layout of the buildings and central public space. The building floor plan forms an 'L' shape framing a public square in the south-east corner of the site. The southern section of the existing building will be retained and intergrated into the development to form a two storey commercial wing to the southwest portion of the site and the external elevation will be modified with new window openings in the gable end... As a whole, the materials reinforce the industrious character of the area, in accordance with the AAP. The proposed development thus preserves those elements of the warehouse that have heritage value derived through their townscape appearance.

**Image: The southern gable wall of the existing building**



**Image: View of development from Devonshire Grove and reconstructed two storey element**



299. Officers consider that the part retention and integration of the existing building on the site would be in keeping with the aspirations of the AAP.

Conclusion on the setting of listed buildings, conservation areas and townscape

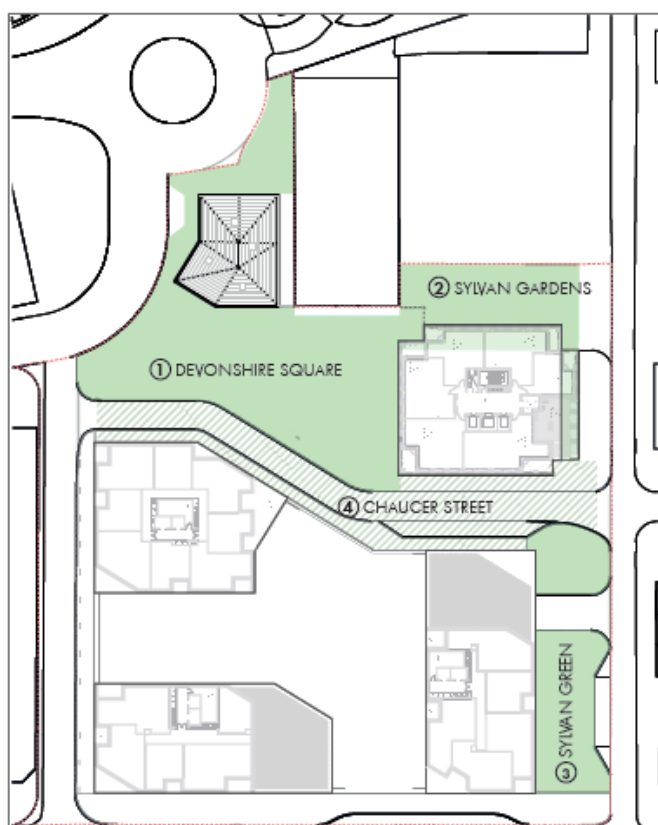
300. In conclusion, it is clear from the assessment that the proposed development would have impacts on some of the views assessed. However, in the majority of cases, the impact is not considered to be harmful. Indeed in some views it is considered beneficial. The quality of design would be high.

**Impact on trees and landscaping**

301. Saved Policy 3.13 of the Southwark Plan requires high quality and appropriately designed streetscape and landscape proposals. The applicant has submitted a Tree survey and the only vegetation growing within the site is a row of shrubbery and young trees close to the car park entrance which are Category C trees. Other trees included in the survey are 3 street trees and a group of four young Hornbeam growing in a grass verge adjacent to the recycling depot. All off-site trees are to be retained and fenced off outside of the construction site. The only arboricultural impact shall be the loss of two young trees T1 and T2 as well as adjacent shrubs. They are considered to have a low amenity value and their removal shall not have a significant impact on the visual amenity of the locality.
302. It is proposed to plant a minimum of 16 trees which is significantly more than what is on site. The long term impact of the development shall be a significant increase in tree cover and an improvement in local amenity. The canopies and root protection areas of all retained trees shall not be impacted upon by any construction activity or future foundations or building.
303. The council's Urban Forester has reviewed the proposals and considers that the proposed landscaping more than adequately mitigates any loss of amenity or canopy cover. It is recommended that a specific tree planting condition be recommended to capture the two street trees outside the applicant's ownership on Sylvan Grove.
304. The overall landscape theme is for a 'garden square', which would sit adjacent to the larger civic space in the Devonshire Square development. The garden square extends across Sylvan Grove providing public realm improvements to the existing street and maximising the development's provision of public open space and having the potential to connect the 3 predominantly residential buildings at the northern end of Sylvan Grove. The landscape design is considered to allow for through routes across the site and would respond well to the activities planned for the ground floor of the proposed development and available to both residents, visitors and those working in the commercial building. The public realm and streetscape would be fully accessible, and would provide level thresholds between internal and external spaces and across the public realm.

305. In order to ensure consistency within the site and with adjoining land owners at Devonshire Square who will deliver the adjoining public space the landscape proposals for this development need to be carefully coordinated with those of the neighbouring site. There have been a number of meetings with adjoining landowners to ensure that this is the case. Officers are currently developing an open space strategy for the OKROA and the principles of that strategy would be applied in discharging the conditions.

**Image: Open spaces including Devonshire Square development**



Public open space diagram

**Planning obligations (S.106 undertaking or agreement)**

306. Saved Policy 2.5 'Planning obligations' of the Southwark Plan and policy 8.2 of the London Plan advise that Local Planning Authorities should seek to enter into planning obligations to avoid or mitigate the adverse impacts of developments which cannot otherwise be adequately addressed through conditions, to secure or contribute towards the infrastructure, environment or site management necessary to support the development, or to secure an appropriate mix of uses within the development. Further information is contained within the council's adopted Planning Obligations and Community Infrastructure Levy SPD. A s106 Legal Agreement is currently being drafted which should include clauses to secure the following:



307. Archaeology: £11,171

Affordable Housing Monitoring: £132.35 per affordable property, 219 x 132.35 = £7808.65

Carbon offset – green fund: £116,180

Communal amenity space: £96,965

Public Open Space: £80,975

Contributions to the bus network: £591,300.

DSP Bond: £22,500

Santander bicycle hire scheme: £10,950

Construction management plan review and monitoring: £8,760

Greenfield runoff rates: £0 (£366 per cubic metre shortfall against greenfield run off rates)

Trees: Two street trees, with in-lieu payment of £6,000 if not feasible to be planted elsewhere at suitable locations in the vicinity.

Section 106 admin charge at 2% of total (excluding the DSP and those contributions that are either separate monitoring contributions or a monitoring contribution is already being collected for this particular obligation)

308. In addition, the following non-financial contributions would be secured within the s106 Legal Agreement:

- Affordable housing provisions, including provision for an early stage review;
- Not more than 50% of the private apartments would be occupied until 50% of the affordable units are complete.
- At least 10% of dwellings to be fully wheelchair accessible (Marketing, allocation and fit out);
- Jobs, skills and training during construction period (including fall-back financial contribution if targets not met);
- Jobs, skills and training once the proposed development is operational (including fall-back financial contribution if targets not met);
- An employment, skills and business support plan;
- 10% of the work space to be affordable work space (see terms below);
- Appointment of workspace co-ordinator;
- Practical Completion of the commercial space to be at the same time, or before, Practical Completion of the residential units above. All commercial spaces to be completed with mechanical and electrical services fitted out, including heating and cooling / ventilation;

- 3 years car club membership for all eligible adult residents of the proposed development;
- Future SELCHP connection to the non-domestic component;
- Demolition Environment Management Plan;
- Final Construction and Environment Management Plan;
- Social rent service charges within the rent cap;
- Service management plan;
- Public access to open space;
- Access to the internal community room for residents at 8-24 Sylvan Grove and local TRA groups.

#### S278 works outline

309. The council's Highway Officers have indicated that works required through a S278 Agreement would include:

- contribution towards the reconstruction of the Sylvan Grove carriageway which from its junction with Old Kent Road to the other end. Because of three proposed major developments (one now completed) either side of the street, LBS Highways decided that it was not judicious for the carriageway reconstruction work to be done ahead of the developments being constructed. Each developer would still be expected to repave the footway, including new silver grey kerbs, in front of their site.
- Repave the footway on Sylvan Grove fronting the development and extending to its north eastern end. Vehicle crossovers to be constructed to the relevant SSDM standards.
- Promote a TRO to rationalise parking arrangements on Sylvan Grove.
- As Sylvan Grove is a cul-de-sac, it is mandatory to provide a vehicle turning facility hence the need to locate the proposed sliding gate further back into the car park. This can be as part of the detailed design through S278 works.
- Prior to works commencing on site (including any demolition) a joint condition survey should be arranged with Southwark Highway Development Team to catalogue condition of streets and drainage gullies.

#### Affordable workspace terms

310. The final details of the affordable workspace offer are subject to negotiations of the s106 Agreement, but at least 303sqm GIA, would be secured and the length of term being 15 years at £12 per sqft.

311. The S106 heads of terms agreed would satisfactorily mitigate against the adverse impacts of the proposed development. In the event that a satisfactory legal agreement has not been entered into by 8 February 2021 it is recommended that the director of planning refuses planning permission, if appropriate, for the following reason:

*The proposal, by failing to provide for appropriate planning obligations secured through the completion of a S106 agreement, fails to ensure adequate provision of affordable housing and mitigation against the adverse impacts of the development through projects or contributions in accordance with saved policy 2.5 'Planning*

*Obligations' of the Southwark Plan (2007), strategic policy 14 'Delivery and Implementation' of the Core Strategy (2011), policy 8.2 'Planning obligations' of the London Plan (2015) and the Planning Obligations and Community Infrastructure Levy SPD (2015)".*

### **Mayoral and Southwark Community Infrastructure Levy (CIL)**

312. 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.
313. In this instance a Mayoral CIL payment of £1,263,512.69 and a Southwark CIL payment of £4,587,392.30 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**

314. Policy 5.2 of the London Plan requires major developments to provide an assessment of their energy demands and to demonstrate that they have taken steps to apply the Mayor’s energy hierarchy. Policies 5.5 and 5.6 require consideration of decentralised energy networks and policy 5.7 requires the use of on-site renewable technologies, where feasible. Of note is that residential buildings must now be carbon zero, and non-domestic buildings must comply with the Building Regulations in terms of their carbon dioxide emissions (35% reduction against part L of the Building Regulations 2013).
315. The carbon dioxide savings exceed the on-site target set for domestic/non-domestic uses. However, the strategy does differ from the hierarchy and this is discussed further below.
316. Be lean (use less energy)

The energy strategy centres on reducing heat losses and demands. Sufficiently reduced demands allow local heat pumps to deliver comfortable spaces and hot water sourced from recycled internal heat gains without needing any large and costly heating networks and centralised plant. Energy efficiency measures include a range of measures including:

- High-performance façade optimising levels of insulation and shading;
- Efficient building airtightness;
- Solar control measures;
- Low energy lighting throughout.

What stands out in this development is that each dwelling is provided with a two-stage Mechanical Ventilation with Heat Recovery (MVHR) with exhaust air heat

pump (2-stage MVHR+EHP) for recovery and recycling of waste heat and upgrading temperatures in so much as is necessary. This proposes a 'Heat Autonomy' energy strategy. The regulated carbon saving achieved in this step of the Energy Hierarchy is 17% for domestic element and 16% for non-domestic element.

Be clean (supply energy efficiently)

317. The GLA in their Stage 1 report had commented that the applicant should provide a commitment to ensure that the development is designed to allow future connection to a district heating network. It was also requested that the applicant should propose a communal heat network supplied by a centralised energy centre, as the development is within an opportunity area for district heating.
318. The applicant has since responded to the comments. Their energy strategy has been designed so that the residential units enhanced 'fabric first' and associated measures have been specifically matched to in-dwelling recycled heat sources availability for the coldest winter day. This exemplar development seeks to demonstrate how BE LEAN coupled with heat pumps can maximise on-site secondary heat sources. By prioritising BE LEAN, heat demands have been specifically matched to secondary heat sources. Consequently the applicant has argued that there is no requirement for any additional centralised energy centre or any district heating connection.
319. Due to its 'Heat autonomy' strategy and under these circumstances the draft new London Plan Policy SI-3 and associated presumptions on district heating are no longer applicable because there is no longer any heat to deliver, or indeed economic basis to warrant such a supply. Discussions between the GLA, the applicant and Council Officers have taken place and an updated energy assessment includes the results of a comparative study between the SELCHP district heating system and proposed 'Heat Autonomy' design.
320. In summary, a switch to the SELCHP district heating system for Sylvan Grove would mean no additional carbon savings, increase in heat bills including heat system service charge, increase in quantity of delivered energy for heat. The Heat autonomous solution reduces plant maintenance/replacement costs.
321. The proposed 'heat autonomy' design was presented and proposed as an exemplar, along with the council's expectations for the future expansion of the SELCHP district heating. Following further analysis clarification, it is considered that the proposed 'Heat Autonomy' approach achieves similar carbon savings and addresses wider policy aspects, and therefore no objections to the proposed energy strategy is raised in this instance.
322. Notwithstanding the above, the GLA had made a comment that the applicant should provide a commitment to ensure that the development is designed to allow future connection to a district heating network.
323. The applicant has responded that there is the potential to connect the commercial / light industrial development areas to a future district heating system. Space for a future district heating connection is provided for the 3000m<sup>2</sup> of non-domestic space

which has an in-building 'ambient loop' water network. It is considered that the development should be future proofed to allow connectivity to the SELCHP DHN when it becomes available in the future and would be secured through the s106 Agreement. However, should a feasibility study (secured in the s106 agreement) demonstrate that the current strategy be the better solution then that requirement to connect to the DHN would not be required.

#### Be Green (low or carbon zero energy)

324. The MVHR energy benefits are included in the BE LEAN part of this report. The heat pump benefits and associated systems efficiencies are included in the BE GREEN part of this report. For the Be Green stage a number of renewable technologies have been appraised in terms of their technical, physical and financial feasibility, as potential renewable systems for use on the project. The technology which best suited is Photovoltaic (PV) panels and air source heat pump (ASPH) on-site. The saving for the domestic element would be 53%. For the non-domestic elements there would be a 45% reduction over the site wide baseline level.
325. The overall predicted reduction in CO2 emissions from the baseline development model (which is Part L 2013 compliant) is approximately 70% for the domestic element, which represents an annual saving of approximately 150 tonnes of CO2. For the non-domestic element there would be a reduction of 61%, representing an annual saving of 26 tonnes of CO2.
326. To enable the domestic element to meet zero carbon target, a one-off carbon offset payment of approximately £116,180 will be required in line with Southwark's Core Strategy and London Plan Policy. This figure is based on a shortfall of 1 tonne CO2 per year for a period of 30 years at a rate of £60/ tonne of CO2. The Applicant has agreed to make this contribution, which would be secured through the s106 Agreement and would therefore make this aspect of the scheme fully policy compliant.

#### Overheating and cooling

327. Policy 5.9 of the London Plan "Overheating and Cooling" states that major development proposals should reduce potential overheating and reliance on air conditioning systems and demonstrate this in accordance with the cooling hierarchy. This policy seeks to reduce the impact of the urban heat island effect.
328. Following the GLA's Stage 1 comments which seek more details on the sample apartments tested and other calculations and modelling. An overheating study was undertaken to enable the site to mitigate the risk of overheating. The proposals to demonstrate compliance are as follows:
- Minimise internal heat generation through energy efficient design;
  - Energy efficient enhanced ventilation systems, thermal insulation on pipework and low energy lighting;
  - Energy efficient facades with appropriate proportions of glazing;
  - Blinds for shading;
  - MVHR units for background ventilation.

BREEAM

329. Strategic Policy 13 of the Core Strategy requires commercial units to achieve BREEAM “excellent”. A BREEAM Pre-assessment report has been undertaken which demonstrates that a “Excellent” standard can be achieved and meets the required “Excellent” standard.

Ecology

330. A Preliminary Ecological Assessment has been submitted in support of this application. The site in its current condition is of little or no ecological value and therefore its redevelopment offers the opportunity to enhance biodiversity opportunities. The mitigation measures include the timing of vegetation clearance works and/or to avoid impacts on nesting birds and the enhancement measures include the introduction of landscape planting with native species or species with a known value to wildlife, and the provision of bat and bird boxes.
331. The council's Ecology Officer has reviewed the proposals and concludes that there are no further surveys required. Conditions have been recommended to secure house sparrow terraces under the amenity roof and bat tubes. It is also considered reasonable to condition that there be the soft landscaping ecological enhancements and biodiverse roofs. The assessment also recommends appropriate ways to clear vegetation and this would be included in the Construction management plan.

Flood Risk and Water Resources

332. The application site is located within Flood Zone 3, which is considered to be ‘High Risk’ but does benefit from the Thames tidal defences.
333. The proposed development has been designed to ensure that the buildings would be protected from surface water flooding through a new drainage system. Sustainable Drainage Systems (SUDs) in the form of combined blue-green roof system at roof level in conjunction with permeable paving for the access roads, below ground attenuation storage and infiltration systems at ground level. The Environment Agency (EA) raises no objections and considers that the development will be at low risk of flooding. Conditions were recommended by the EA and it is considered prudent to impose these.
334. The council's Flood Risk and Drainage team have also reviewed the submitted material and Drainage Strategy. After initial review, the applicant has submitted a revised strategy and demonstrates that the development would limit surface water discharge rates to greenfield rates (2.2 l/s) for the 1% AEP storm + climate change allowance using a range of SUDs features. The final strategy will need to be confirmed at detailed design stage. A condition is therefore recommended for the submission of a final drainage strategy for review and consideration if any changes are made at that stage.
335. A greenfield runoff rate offset of £366 per cubic metre will be secured in the event that there is a shortfall in attenuation required to limit surface water run off, which is required by the draft AAP 11.

### Fire safety strategy

336. The applicant has submitted a high level fire strategy prior to the submission of the amended plans and details the key fire safety design principles within the proposed development. It is intended that the fire safety proposals will satisfy the requirements of the relevant legislation. All single level apartments will be provided with a fire detection and fire alarm system in accordance with the relevant recommendations. The strategy also highlighted the minimum fire resistance requirements for the structural elements and compartmentation. A condition has been attached to the draft decision notice to require details of the sprinkler system to all the commercial units to be submitted and approved. All of the residential units would also have a sprinkler system.

### **Archaeology**

337. The site is currently within the Bermondsey Lake Archaeological Priority Zone (APZ) designated for its potential for prehistoric and paleo-environmental remains. Once Southwark's new archaeological priority areas are formally adopted, the application site will be within the Tier 1 'North Southwark and Roman Roads' Archaeological Priority Area. Significant archaeological remains predominately of prehistoric and Roman date have been discovered in the general Old Kent Road area from a number of sites. However, previous excavations which have taken place to the immediate west, north and south of the application site have been largely negative. The applicant has submitted a desk based assessment (DBA) which is a very thorough piece of archaeological research. The DBA identifies the potential for archaeological remains to survive on this site. The council's Archaeological Officer has reviewed the DBA and raises no objections and has recommended conditions.

### **Environmental considerations**

#### **Contaminated land**

338. The applicant has submitted a Phase 1 environmental risk assessment given the past industrial and commercial uses on the site. The assessment confirms that on account of the site's previous industrial use, there are numerous sources of contamination recorded both on the site and in its vicinity. The site itself is considered to represent a high to medium risk to all identified receptors, and accordingly further targeted ground investigation is required to quantify risks to future users and surrounding receptors and inform any remediation and mitigation controls that may be necessary.
339. The submitted material has been reviewed by EPT. A condition has been recommended to deal with contaminated land which has been included with this recommendation.

### Hazardous sites

340. Paragraph 45 of the NPPF states that local planning authorities should consult the appropriate bodies when planning, or determining applications, for development

around major hazards. The site was located within the designated Consultation Distance of a Major Hazard Site (Old Kent Road Gasholder Station, 709 Old Kent Road) and as such the Health and Safety Executive (HSE) was a statutory consultee for this application. However, subsequent to the consultation, the council as the Hazardous Substances Authority made an order to the Secretary of State for Housing, Communities and Government to revoke the Hazardous Substances Consent on 5 February 2020.

341. HSE then confirmed in writing that the hazardous substances consent has been formally revoked and HSE has removed the consultation distance and has withdrawn their initial comments.

#### Air quality

342. The site lies within an Air Quality Management Area (AQMA). This means the air quality is poor, with high levels of pollutants including particulate matter (PM10) and nitrogen dioxide (NO2). Southwark Plan Policy 3.6, Air Quality, states that planning permission will not be granted for development that would “lead to a reduction in air quality.” London Plan (2016) Policy 7.14 states that development proposals should minimise increased exposure to existing poor air quality and make provision to address local problems of air quality.
343. The applicant has submitted an air quality assessment, reporting on the potential impacts of the proposed development on local air quality. This identified that during the construction phase there would be a medium risk of impacts in the absence of suitable mitigation. It has recommended that suitable mitigation be provided through a series of measures set out in a detailed dust management plan prior to the start of demolition and construction works. Once operational and occupied, the development is not expected to raise significant air quality impacts. An air quality neutral assessment has shown that the proposed development would meet both the Building Emission Benchmark and Transport Emission Benchmark and is therefore air quality neutral. The mitigation measures will be secured through the CEMP required by the s106 Agreement.
344. The council’s EPT has reviewed the assessment and raised no concerns or objections relating to air quality.

#### Wind and microclimate

345. The applicant has submitted a Pedestrian Level Wind Microclimate Assessment, which looks at the likely impacts of the proposed development on wind and microclimate in terms of pedestrian safety and comfort and to ensure that wind conditions around the site do not adversely interfere with the intended pedestrian activities, so that all public spaces have amenable environmental conditions.
346. Three scenarios have been analysed :
- Baseline: the existing wind environment at the site
  - Proposed: the proposed development within the context of existing surrounds
  - Cumulative: the proposed development within the context of future/consented surrounds.



347. It concludes that although many areas of the site would have acceptable wind conditions in the presence of the proposed development, several locations within and around the site would have wind conditions that are windier than desired for their respective uses. Furthermore, there would also be several occurrences of strong winds which require mitigation measures. The assessment provides details of the locations which would require mitigation measures in the context of the existing surrounding buildings. In the cumulative scenario, the conditions would improve as the Devonshire Square development would be in place, but there would be localised windier conditions in some areas. It recommends that in the event the Devonshire Square development does not come forward prior to the proposed development the suggested mitigation measures should be developed and verified through further wind tunnel testing to ensure effectiveness of the mitigation strategy.
348. Officers consider that it is reasonable to require the suggested mitigation measures and details to be submitted (included with landscape detailed design condition). Subject to the imposition of a wind mitigation condition, the impacts of the scheme on the local wind microclimate would be acceptable.

#### Aviation

349. National Air Traffic Services (NATS) were consulted and raises no objection to the scheme.

#### Telecommunications and Electronic Interference

350. Arqiva (who own and operate the UK Terrestrial Television Broadcast network and supply the Freeview platform) was consulted but no comments have been received.

#### **Conclusion on planning issues**

351. The proposed development would result in the introduction of residential uses into the SIL and would therefore represent a departure from the adopted development plan. However, the adopted London Plan (2016) clearly identifies the Old Kent Road as an opportunity area which will undergo significant transformation with substantial growth including new housing. In advance of emerging policy being adopted, and SIL being formally released, this proposal must be weighed against the wider regeneration benefits of the scheme.
352. The proposed development would increase the numbers of jobs on the site and deliver new housing, including more than 35% affordable housing in terms of habitable rooms. Affordable workspace has also been proposed. Recognising the changing character and uses carried out in the immediate area and the adjoining Devonshire Square development, 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.
353. The proposal would deliver a good standard of accommodation and would address the majority of standards as set out in the residential design standards.

354. A new publicly accessible park and associated public realm would improve permeability across the site allowing for this part of the OKR OA to achieve its full connectivity including pedestrians and cyclists.
355. The potential impacts identified are not considered to be significant to adversely impact on neighbouring residents. The existing nearby residents would have adequate outlook and privacy. The loss of daylight levels to 8-24 Sylvan Grove is acknowledged, but this is primarily a result of its own design.
356. The building height proposed would represent a step change in the existing scale of the area, but as an Opportunity Area site, it is considered that the height proposed would be in accordance with the objectives of the London Plan (2016), in that it would optimise the development potential of the site. Furthermore, it would sit well with the approved Devonshire Square development and would not harm any nearby heritage assets. The protected views would not be harmed. The design and materiality is considered to respond well and complimentary to the schemes that have been approved. The ground floor pedestrian experience would be vibrant and well animated with ground floor frontages enhancing the surrounding area.
357. In order to ensure that on-street servicing and deliveries do not negatively impact on the highway network, the applicant has agreed to enter into a Delivery Service Plan Bond with the council. Cycle and car parking levels are acceptable, and innovative proposals to encourage people to use alternative transport measures, such as contribution to the Santander cycle hire docking station are welcomed.
358. It is therefore recommended that planning permission be granted subject to conditions, referral to the Mayor of London and the completion of a s106 Legal Agreement under the terms as set out above.

#### **Consultations**

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

#### **Consultation replies**

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

### **Statement of community involvement**

361. Consultation was carried out by the applicant prior to the submission of the planning application. The applicant has submitted a Statement of Community Involvement and the Engagement Summary (required by the Development Consultation Charter). The consultation was carried out with the local community and key stakeholders from the area and included the following forms of activity:

- Two public exhibitions held on the 19 and 21 January 2019 on the site;
- Advertising for the exhibitions involved almost 1,900 leaflets being sent to local residents and businesses within the surrounding area of the development site and existing Daisy Business Park tenants;
- A dedicated project website [www.sylvangrove.co.uk](http://www.sylvangrove.co.uk) , A1 signs on the day of the exhibitions, and an advert in the Southwark News;
- 34 people attended the public exhibition, including tenants of the site, a Southwark councillor for Old Kent Road ward and a representative of Southwark Cyclists;
- A meeting between the project team and ward councillor for Old Kent Road on 5 April 2019;
- A drop-in session for the existing tenants of Daisy Business Park took place on 29 November 2018;
- Pre-application discussions and meetings with Southwark Officers.

362. To summarise, the points raised from the consultation exercise were:

- Mixed response to the building heights proposed, given the tall buildings coming forward elsewhere locally;
- The impact of odours from the waste management facility on the residential accommodation;
- How the redevelopment of Daisy Business Park fits into the wider
- Old Kent Road regeneration and the proposals for Devonshire Square;
- The timeline for existing tenants and how long they were able to remain on the site for;
- Support for tenants who are looking to relocate and/or return to the site once complete;
- Loss of parking for businesses;
- Potential increase in rents for returning businesses;
- Potential to provide 4 bedroom units;
- Possible impact on daylight and sunlight levels to existing Sylvan Grove residents.

### **Community impact statement / Equalities Assessment**

363. The Public Sector Equality Duty (PSED) contained in Section 149 (1) of the Equality Act 2010 imposes a duty on public authorities to have, in the exercise of their functions, due regard to three "needs" which are central to the aims of the Act:

- a) The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act

- b) The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:
- Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
  - Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it
  - Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low
- c) The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to tackle prejudice and promote understanding.
364. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.
365. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights.
366. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application. This is addressed in detail in the relevant section of this report.
367. Officers are of the view that the development would not cause disadvantage to those with protected characteristics. This is further discussed below.

#### Access and equality measures

368. The Design and Access Statement contains a section on 'Inclusive Access' which sets out measures which would be incorporated into the development to assist people with mobility impairments, visual impairments, deaf people, older people and small children. Measures which would be incorporated include level access to buildings and communal amenity areas, the entrance of the building and the public park; access to lifts for all the proposed dwellings; wheelchair accessible and adaptable residential units and wheelchair accessible parking spaces. Pedestrian access routes are defined as the most direct and convenient pedestrian routes linking key parts of a development. They are designed to be inclusive and have access features such as gentle gradients, suitable surfaces and rest point. . All routes meet or exceed the Building regulations of Approved Document Part M 2015.

#### Positive equality impacts

#### Provision of new housing including affordable housing

369. The Strategic Housing Market Assessment (SHMA) prepared on behalf of a number of South East London boroughs states that Southwark, together with Lewisham, has the most ethnically mixed population in the South East London sub-region. Compared to the population at large a very high proportion of Black households (70%) are housed in the social/affordable rented sector. These groups could therefore stand to benefit from the proposed affordable housing, which would include social rented units and larger family sized flats.

Improved and more accessible public realm

370. Physical measures such as the level surfaces, resting places and a number of pedestrian routes proposed could particularly benefit disabled people. There would be improved connections to the wider area which would benefit older people, disabled people, young people, women and children.

Affordable Work Space

371. The proposed development would include new affordable work space. The unit would be marketed to businesses based in the Old Kent Road Opportunity Area for nine months before being marketed to businesses in the rest of Southwark. As discussed elsewhere in this report the development won't prejudice the continued operation of the neighbouring church on Sylvan Grove.

**Human rights implications**

372. This planning application engages certain human rights under the Human Rights Act 1998 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.
373. This application has the legitimate aim of providing new residential, retail, office development and destination space. 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/2419-19	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403
Application file: 19/AP/2307		Planning enquiries email: <a href="mailto:planning.enquiries@southwark.gov.uk">planning.enquiries@southwark.gov.uk</a>
Southwark Local Development Framework and Development Plan Documents		Case officer telephone: 0207 525 7194
		Council website: <a href="http://www.southwark.gov.uk">www.southwark.gov.uk</a>

**APPENDICES**

<b>No.</b>	<b>Title</b>
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Recommendation

**AUDIT TRAIL**

<b>Lead Officer</b>	Simon Bevan, Director of Planning	
<b>Report Author</b>	Wing Lau, Team Leader <a href="mailto:Wing.lau@southwark.gov.uk">Wing.lau@southwark.gov.uk</a>	
<b>Version</b>	Final	
<b>Dated</b>	20 August 2020	
<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments included</b>
Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Social Regeneration	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
<b>Date final report sent to Constitutional Team</b>		21 August 2020

## APPENDIX 1

**Consultation undertaken****Site notice date:** n/a.**Press notice date:** 21/11/2019**Case officer site visit date:** n/a**Neighbour consultation letters sent:** 24/09/2019**Internal services consulted**

Archaeology  
Tree Services

Waste Management

Archaeology

Local Economy  
Ecology  
Environmental Protection  
Highways Development and Management  
Highways Licensing  
Urban Forester  
Flood Risk Management & Urban Drainage

**Statutory and non-statutory organisations**

Historic England

Environment Agency  
Great London Authority

London Fire & Emergency Planning Authorities  
London Underground  
Natural England - London & South East Region

Metropolitan Police Service (Designing O)  
Thames Water  
Transport for London  
Network Rail  
EDF Energy

**Neighbour and local groups consulted:**

817 Old Kent Road London Southwark  
346 Commercial Way London Southwark  
344 Commercial Way London Southwark  
340 Commercial Way London Southwark

Flat 2 18 Sylvan Grove London  
Flat 14 8 Sylvan Grove London  
Flat 6 8 Sylvan Grove London  
Flat 18 Radford Court 814 Old Kent Road

Unit 19 Ullswater House Hillbeck Close  
 Unit 7 Ullswater House Hillbeck Close  
 Unit 6 Ullswater House Hillbeck Close  
 First Floor Flat 720A Old Kent Road London  
 95 Manor Grove London Southwark  
 First Floor 96-108 Ormside Street London  
 60 Caroline Gardens Asylum Road London  
 91 Caroline Gardens Asylum Road London  
 107 Caroline Gardens Asylum Road London  
 Unit 3 And 4 96-108 Ormside Street London  
 720A Old Kent Road London Southwark  
 Flat 26 Bowness House Tustin Estate  
 Hillbeck Close  
 Unit 3 Daisy Business Park 35 Sylvan Grove  
 Flat 2 24 Sylvan Grove London  
 Flat 4 18 Sylvan Grove London  
 Flat 22 8 Sylvan Grove London  
 Units 16 And 17 The Penarth Centre  
 Penarth Street  
 Flat 20 Radford Court 814 Old Kent Road  
 Unit 11A Ullswater House Hillbeck Close  
 Flat 28 Harry Lamborn House 9 Gervase  
 Street  
 Apartment A 6 Asylum Road London  
 72 Caroline Gardens Asylum Road London  
 815 Old Kent Road London Southwark  
 57 Manor Grove London Southwark  
 28 Hillbeck Close London Southwark  
 27 Hillbeck Close London Southwark  
 21 Hillbeck Close London Southwark  
 13 Hillbeck Close London Southwark  
 Southwark Integrated Waste Management  
 Facility 43 Devon Street London  
 811 Old Kent Road London Southwark  
 Outside 1 Murdock Street London  
 Flat 12 24 Sylvan Grove London  
 Flat 9 18 Sylvan Grove London  
 Flat 3 18 Sylvan Grove London  
 Unit 21B The Penarth Centre Penarth Street  
 Unit 37A Ullswater House Hillbeck Close  
 Unit 17A Ullswater House Hillbeck Close  
 Flat 10 Radford Court 814 Old Kent Road  
 Flat 8 Radford Court 814 Old Kent Road  
 Unit 25 Ullswater House Hillbeck Close  
 Unit 12 Ullswater House Hillbeck Close  
 94 Caroline Gardens Asylum Road London  
 Flat 23 Bowness House Tustin Estate  
 Hillbeck Close  
 71 Manor Grove London Southwark  
 22 Hillbeck Close London Southwark  
 Unit 31A Ullswater House Hillbeck Close  
 Flat 18 24 Sylvan Grove London  
 Flat 24 Harry Lamborn House 9 Gervase  
 Street  
 68 Caroline Gardens Asylum Road London  
 Flat 15 Harry Lamborn House 9 Gervase  
 Street  
 Flat 28 Kentmere House Tustin Estate  
 Manor Grove  
 Unit 24 Kent Park Industrial Estate Ruby  
 Street  
 Flat 34 Bowness House Tustin Estate  
 Hillbeck Close  
 Flat 21 Bowness House Tustin Estate  
 Hillbeck Close  
 Flat 8 24 Sylvan Grove London  
 Flat 10 8 Sylvan Grove London  
 Unit 8 Ullswater House Hillbeck Close  
 Unit 3 Ullswater House Hillbeck Close  
 Unit 31 The Penarth Centre Penarth Street  
 Unit 3 The Penarth Centre Penarth Street  
 118-120 Ormside Street London Southwark  
 Ground Floor 78-94 Ormside Street London  
 58 Caroline Gardens Asylum Road London  
 Flat 16 Kentmere House Tustin Estate  
 Manor Grove  
 24 Manor Grove London Southwark  
 12B Sylvan Grove London Southwark  
 Unit 22A Ullswater House Hillbeck Close  
 Block A Room 2 Milestone Court 1 Wales  
 Close  
 97 Manor Grove London Southwark  
 Flat 9 Harry Lamborn House 9 Gervase  
 Street  
 14 Hillbeck Close London Southwark  
 Unit 18 Ullswater House Hillbeck Close  
 805-807 Old Kent Road London Southwark  
 Flat 7 Milestone Court 1 Wales Close  
 Flat 4 Milestone Court 1 Wales Close  
 726A Old Kent Road London Southwark  
 1 Hillbeck Close London Southwark  
 Flat 3 24 Sylvan Grove London  
 Unit 6 25-39 Devon Street London  
 Unit 5 First Floor Daisy Business Park 35  
 Sylvan Grove  
 Flat 27 Harry Lamborn House 9 Gervase  
 Street  
 Flat 2 Harry Lamborn House 9 Gervase  
 Street  
 Flat 18 Harry Lamborn House 9 Gervase  
 Street  
 Flat 13 Harry Lamborn House 9 Gervase  
 Street  
 83 Caroline Gardens Asylum Road London  
 110 Caroline Gardens Asylum Road London  
 803 Old Kent Road London Southwark  
 61 Manor Grove London Southwark  
 2 Hillbeck Close London Southwark  
 711-713 Old Kent Road London Southwark  
 Unit C 45 Devon Street London  
 Flat 5 24 Sylvan Grove London  
 Flat 1 18 Sylvan Grove London



Flat 16 8 Sylvan Grove London  
 First Floor 145 Ormside Street London  
 24A Manor Grove London Southwark  
 Unit 7 The Penarth Centre Penarth Street  
 Flat 4 Radford Court 814 Old Kent Road  
 Unit 25 And 26 The Penarth Centre Penarth Street  
 149 Ormside Street London Southwark  
 First Floor And Second Floor Flat 729 Old Kent Road London  
 Flat 8 Harry Lamborn House 9 Gervase Street  
 Unit C 6 Asylum Road London  
 Flat 25 Harry Lamborn House 9 Gervase Street  
 Flat 21 Harry Lamborn House 9 Gervase Street  
 Flat 3 Harry Lamborn House 9 Gervase Street  
 Flat 23 Harry Lamborn House 9 Gervase Street  
 Milestone Court 1 Wales Close London  
 4 Asylum Road London Southwark  
 95 Caroline Gardens Asylum Road London  
 103 Caroline Gardens Asylum Road London  
 5 Sylvan Terrace Sylvan Grove London  
 75 Manor Grove London Southwark  
 12 Hillbeck Close London Southwark  
 747-759 Old Kent Road London Southwark  
 Flat 6 Bowness House Tustin Estate Hillbeck Close  
 Flat 27 Bowness House Tustin Estate Hillbeck Close  
 Flat 16 Bowness House Tustin Estate Hillbeck Close  
 819 Old Kent Road London Southwark  
 Flat 27 Kentmere House Tustin Estate Manor Grove  
 107-113 Ormside Street London Southwark  
 Unit 1 777 Old Kent Road London  
 821 Old Kent Road London Southwark  
 Flat 24 Bowness House Tustin Estate Hillbeck Close  
 Flat 32 Kentmere House Tustin Estate Manor Grove  
 22 Sylvan Grove London Southwark  
 16 Sylvan Grove London Southwark  
 Flat 28 24 Sylvan Grove London  
 Flat 13 24 Sylvan Grove London  
 Flat 16 24 Sylvan Grove London  
 Flat 18 18 Sylvan Grove London  
 Flat 23 8 Sylvan Grove London  
 Flat 18 8 Sylvan Grove London  
 Flat 12 18 Sylvan Grove London  
 Flat 5 18 Sylvan Grove London  
 Flat 2 8 Sylvan Grove London  
 Unit 28B The Penarth Centre Penarth Street  
 Unit 20 Left The Penarth Centre Penarth Street  
 24B Manor Grove London Southwark  
 Flat 1 719-721 Old Kent Road London  
 Flat 4 719-721 Old Kent Road London  
 Flat 14 Radford Court 814 Old Kent Road  
 Room 7 720 Old Kent Road London  
 Flat 3 Milestone Court 1 Wales Close  
 Rear Flat 724 Old Kent Road London  
 Unit 1 And 2 96-108 Ormside Street London  
 Storage Land Part Unit 9 709 Old Kent Road London  
 7 Hillbeck Close London Southwark  
 Flat 2 719-721 Old Kent Road London  
 Unit 30 The Penarth Centre Penarth Street  
 Flat 16 Radford Court 814 Old Kent Road  
 Flat 15 Radford Court 814 Old Kent Road  
 Flat 11 Radford Court 814 Old Kent Road  
 Flat 13 Radford Court 814 Old Kent Road  
 Unit 36 Ullswater House Hillbeck Close  
 Unit 32 Ullswater House Hillbeck Close  
 Unit 27 Ullswater House Hillbeck Close  
 Unit 23 Ullswater House Hillbeck Close  
 Unit 9 Ullswater House Hillbeck Close  
 Apartment H 6 Asylum Road London  
 Second Floor And Third Floor 735 Old Kent Road London  
 Room 5 720 Old Kent Road London  
 Room 2 720 Old Kent Road London  
 Unit 6 Daisy Business Park 35 Sylvan Grove  
 Unit 7A 709 Old Kent Road London  
 Flat 33 Harry Lamborn House 9 Gervase Street  
 Lower Ground Floor Ground Floor And Part First Floor 735 Old Kent Road London  
 Unit 11 Ullswater House Hillbeck Close  
 101 Caroline Gardens Asylum Road London  
 10A Asylum Road London Southwark  
 75 Caroline Gardens Asylum Road London  
 Unit 22 Kent Park Industrial Estate Ruby Street  
 15 Hillbeck Close London Southwark  
 Flat 8 18 Sylvan Grove London  
 Flat 17 8 Sylvan Grove London  
 Flat 19 Radford Court 814 Old Kent Road  
 Unit 15 Ullswater House Hillbeck Close  
 Unit 29 The Penarth Centre Penarth Street  
 Apartment I 6 Asylum Road London  
 Apartment N 6 Asylum Road London  
 Apartment K 6 Asylum Road London  
 Flat 29 Harry Lamborn House 9 Gervase Street  
 80 Caroline Gardens Asylum Road London  
 104 Caroline Gardens Asylum Road London  
 342 Commercial Way London Southwark

Unit 9 709 Old Kent Road London  
 Flat 10 Kentmere House Tustin Estate  
 Manor Grove  
 789-799 Old Kent Road London Southwark  
 Asaholah Salvation Church Of God 137A  
 Ormside Street London  
 Flat 3 Bowness House Tustin Estate Hillbeck  
 Close  
 32 Hillbeck Close London Southwark  
 26 Hillbeck Close London Southwark  
 17 Hillbeck Close London Southwark  
 Flat 17 Bowness House Tustin Estate  
 Hillbeck Close  
 737-745 Old Kent Road London Southwark  
 Unit F 45 Devon Street London  
 Flat 17 24 Sylvan Grove London  
 Unit 20 Daisy Business Park 35 Sylvan  
 Grove  
 Block A Room 1 Milestone Court 1 Wales  
 Close  
 Unit 13 Ullswater House Hillbeck Close  
 814A Old Kent Road London Southwark  
 Unit 29A Ullswater House Hillbeck Close  
 Unit 12 The Penarth Centre Penarth Street  
 Unit 2 25-39 Devon Street London  
 709 Old Kent Road London Southwark  
 93 Manor Grove London Southwark  
 Apartment R 6 Asylum Road London  
 Apartment G 6 Asylum Road London  
 Flat 14 Harry Lamborn House 9 Gervase  
 Street  
 Flat 12 Harry Lamborn House 9 Gervase  
 Street  
 67 Caroline Gardens Asylum Road London  
 106 Caroline Gardens Asylum Road London  
 Flat 11 Kentmere House Tustin Estate  
 Manor Grove  
 336 Commercial Way London Southwark  
 3 Sylvan Terrace Sylvan Grove London  
 332 Commercial Way London Southwark  
 722A Old Kent Road London Southwark  
 720B Old Kent Road London Southwark  
 77 Manor Grove London Southwark  
 59 Manor Grove London Southwark  
 8 Hillbeck Close London Southwark  
 31 Hillbeck Close London Southwark  
 20 Hillbeck Close London Southwark  
 18 Hillbeck Close London Southwark  
 16 Hillbeck Close London Southwark  
 11 Hillbeck Close London Southwark  
 67-105 Ormside Street London Southwark  
 760 Old Kent Road London Southwark  
 Flat 7 Bowness House Tustin Estate Hillbeck  
 Close  
 Flat 4 Bowness House Tustin Estate Hillbeck  
 Close

Flat 33 Bowness House Tustin Estate  
 Hillbeck Close  
 Flat 18 Bowness House Tustin Estate  
 Hillbeck Close  
 Flat 15 24 Sylvan Grove London  
 Flat 11 18 Sylvan Grove London  
 Unit D 45 Devon Street London  
 Unit A 45 Devon Street London  
 Flat 1 721 Old Kent Road London  
 Unit 19 The Penarth Centre Penarth Street  
 Units 32 And 32A The Penarth Centre  
 Penarth Street  
 Unit 10A Ullswater House Hillbeck Close  
 Unit 15A Ullswater House Hillbeck Close  
 Unit 40 Ullswater House Hillbeck Close  
 Unit 14 Ullswater House Hillbeck Close  
 Flat 1 Radford Court 814 Old Kent Road  
 145 Ormside Street London Southwark  
 Flat 31 Kentmere House Tustin Estate  
 Manor Grove  
 23 Hillbeck Close London Southwark  
 Unit 7 25-39 Devon Street London  
 132-136 Ormside Street London Southwark  
 Third Floor 777 Old Kent Road London  
 Flat 5 Milestone Court 1 Wales Close  
 First Floor 78-94 Ormside Street London  
 2A Asylum Road London Southwark  
 720C Old Kent Road London Southwark  
 Land At 709 Old Kent Road London  
 First Floor 777 Old Kent Road London  
 8 Asylum Road London Southwark  
 87 Caroline Gardens Asylum Road London  
 70 Caroline Gardens Asylum Road London  
 6 Sylvan Terrace Sylvan Grove London  
 10 Asylum Road London Southwark  
 Block A Room 5 Milestone Court 1 Wales  
 Close  
 Unit 1 2 And 4 The Penarth Centre Penarth  
 Street  
 Flat 1 Milestone Court 1 Wales Close  
 Ground Floor 145 Ormside Street London  
 91 Manor Grove London Southwark  
 57 Caroline Gardens Asylum Road London  
 Flat 1 8 Sylvan Grove London  
 Flat 17 Radford Court 814 Old Kent Road  
 Unit 26 Ullswater House Hillbeck Close  
 10A Sylvan Grove London Southwark  
 Flat 4 721 Old Kent Road London  
 Unit 21 Daisy Business Park 35 Sylvan  
 Grove  
 724A Old Kent Road London Southwark  
 Living Accommodation 14 Ruby Street  
 London  
 Unit 3 25-39 Devon Street London  
 64 Caroline Gardens Asylum Road London  
 Flat 6 Radford Court 814 Old Kent Road

Unit 35 Ullswater House Hillbeck Close  
 Flat 723 Old Kent Road London  
 Block A Room 3 Milestone Court 1 Wales Close  
 Apartment Q 6 Asylum Road London  
 Unit B 6 Asylum Road London  
 Flat 3 719-721 Old Kent Road London  
 143 Ormside Street London Southwark  
 25 Hatcham Road London Southwark  
 Unit 1040 737-745 Old Kent Road London  
 Unit 1 25-39 Devon Street London  
 Flat 30 Harry Lamborn House 9 Gervase Street  
 79A Caroline Gardens Asylum Road London  
 Flat 11 Harry Lamborn House 9 Gervase Street  
 69 Caroline Gardens Asylum Road London  
 93 Caroline Gardens Asylum Road London  
 Flat 1 Bowness House Tustin Estate Hillbeck Close  
 338 Commercial Way London Southwark  
 Flat 30 Bowness House Tustin Estate Hillbeck Close  
 727 Old Kent Road London Southwark  
 Flat 19 Bowness House Tustin Estate Hillbeck Close  
 Unit 2 777 Old Kent Road London  
 Flat 31 Bowness House Tustin Estate Hillbeck Close  
 Flat 13 Bowness House Tustin Estate Hillbeck Close  
 Units 1 And 2 Daisy Business Park 35 Sylvan Grove  
 89 Manor Grove London Southwark  
 83 Manor Grove London Southwark  
 18-22 Penarth Street London Southwark  
 1 Sylvan Terrace Sylvan Grove London  
 Unit 4 Daisy Business Park 35 Sylvan Grove  
 4 Sylvan Terrace Sylvan Grove London  
 Pilgrims Way Junior And Infant School Manor Grove London  
 Second Floor Flat 720A Old Kent Road London  
 Room 9 720 Old Kent Road London  
 Room 6 720 Old Kent Road London  
 Second Floor 777 Old Kent Road London  
 Room 3 720 Old Kent Road London  
 Flat 2 Milestone Court 1 Wales Close  
 24-32 Murdock Street London Southwark  
 Unit 5 25-39 Devon Street London  
 2-20 Devon Street London Southwark  
 Unit 4 25-39 Devon Street London  
 Flat 2 721 Old Kent Road London  
 Land At 2-20 Devon Street London  
 Ullswater House Hillbeck Close London  
 71 Caroline Gardens Asylum Road London  
 Flat 27 24 Sylvan Grove London  
 Flat 20 24 Sylvan Grove London  
 2 Sylvan Terrace Sylvan Grove London  
 801 Old Kent Road London Southwark  
 Flat 22 24 Sylvan Grove London  
 Flat 4 24 Sylvan Grove London  
 63 Manor Grove London Southwark  
 30 Hillbeck Close London Southwark  
 Flat 6 18 Sylvan Grove London  
 Flat 13 8 Sylvan Grove London  
 Unit 20 Ullswater House Hillbeck Close  
 Unit 22 The Penarth Centre Penarth Street  
 726 Old Kent Road London Southwark  
 Flat 26 Kentmere House Tustin Estate Manor Grove  
 14B Sylvan Grove London Southwark  
 Flat 13 18 Sylvan Grove London  
 Unit E 6 Asylum Road London  
 Rear Of 731A Old Kent Road London  
 Apartment M 6 Asylum Road London  
 Flat 4 Harry Lamborn House 9 Gervase Street  
 Flat 19 Harry Lamborn House 9 Gervase Street  
 Units 5 And 6 The Penarth Centre Penarth Street  
 Unit 34 The Penarth Centre Penarth Street  
 Unit 23 The Penarth Centre Penarth Street  
 Unit 13 The Penarth Centre Penarth Street  
 Unit 24 The Penarth Centre Penarth Street  
 Units 18 And 33 The Penarth Centre Penarth Street  
 Unit 21A The Penarth Centre Penarth Street  
 Unit 28A The Penarth Centre Penarth Street  
 Unit 20 Right The Penarth Centre Penarth Street  
 723 Old Kent Road London Southwark  
 Unit 37 Ullswater House Hillbeck Close  
 Unit 29 Ullswater House Hillbeck Close  
 Unit 24 Ullswater House Hillbeck Close  
 Unit 2 Ullswater House Hillbeck Close  
 Unit 34 Ullswater House Hillbeck Close  
 Unit 31 Ullswater House Hillbeck Close  
 Unit 21 Ullswater House Hillbeck Close  
 Unit 39 Ullswater House Hillbeck Close  
 Flat 8 Milestone Court 1 Wales Close  
 Flat 6 Milestone Court 1 Wales Close  
 85 Manor Grove London Southwark  
 87 Manor Grove London Southwark  
 Flat 29 Kentmere House Tustin Estate Manor Grove  
 Flat 8 8 Sylvan Grove London  
 88 Caroline Gardens Asylum Road London  
 Flat 12 Kentmere House Tustin Estate Manor Grove  
 Flat 8 Bowness House Tustin Estate Hillbeck

Close  
 9 Hillbeck Close London Southwark  
 6 Hillbeck Close London Southwark  
 Flat 10 Bowness House Tustin Estate  
 Hillbeck Close  
 809 Old Kent Road London Southwark  
 20 Sylvan Grove London Southwark  
 Flat 23 24 Sylvan Grove London  
 Flat 20 18 Sylvan Grove London  
 Flat 10 18 Sylvan Grove London  
 Unit 14 And 15 The Penarth Centre Penarth  
 Street  
 Unit 11 The Penarth Centre Penarth Street  
 Unit 8 The Penarth Centre Penarth Street  
 Unit 5 Ground Floor Daisy Business Park 35  
 Sylvan Grove  
 810 Old Kent Road London Southwark  
 First Floor And Second Floor Flat 722B Old  
 Kent Road London  
 Apartment L 6 Asylum Road London  
 Flat 7 Harry Lamborn House 9 Gervase  
 Street  
 Flat 6 Harry Lamborn House 9 Gervase  
 Street  
 Flat 35 Harry Lamborn House 9 Gervase  
 Street  
 Flat 1 Harry Lamborn House 9 Gervase  
 Street  
 62 Caroline Gardens Asylum Road London  
 89 Caroline Gardens Asylum Road London  
 82 Caroline Gardens Asylum Road London  
 76 Caroline Gardens Asylum Road London  
 2 Asylum Road London Southwark  
 109 Caroline Gardens Asylum Road London  
 81 Manor Grove London Southwark  
 67 Manor Grove London Southwark  
 137 Ormside Street London Southwark  
 Unit 1 709 Old Kent Road London  
 127-135 Ormside Street London Southwark  
 722B Old Kent Road London Southwark  
 Flat 29 Bowness House Tustin Estate  
 Hillbeck Close  
 Flat 9 24 Sylvan Grove London  
 Flat 6 24 Sylvan Grove London  
 Flat 1 24 Sylvan Grove London  
 Flat 19 18 Sylvan Grove London  
 Flat 16 18 Sylvan Grove London  
 Flat 15 18 Sylvan Grove London  
 Flat 21 8 Sylvan Grove London  
 Flat 11 8 Sylvan Grove London  
 Unit E 45 Devon Street London  
 Unit B 45 Devon Street London  
 14A Sylvan Grove London Southwark  
 16-18 Kent Park Industrial Estate Ruby  
 Street London  
 Flat 5 Radford Court 814 Old Kent Road  
 Flat 2 Radford Court 814 Old Kent Road  
 Unit 38 Ullswater House Hillbeck Close  
 Unit 30 Ullswater House Hillbeck Close  
 Unit 28 Ullswater House Hillbeck Close  
 Unit 17 Ullswater House Hillbeck Close  
 Unit 4 Ullswater House Hillbeck Close  
 Room 4 720 Old Kent Road London  
 767-775 Old Kent Road London Southwark  
 Flat 36 Harry Lamborn House 9 Gervase  
 Street  
 Flat 22 Harry Lamborn House 9 Gervase  
 Street  
 74 Caroline Gardens Asylum Road London  
 79 Manor Grove London Southwark  
 Flat 5 Bowness House Tustin Estate Hillbeck  
 Close  
 10 Hillbeck Close London Southwark  
 Flat 14 24 Sylvan Grove London  
 Flat 7 18 Sylvan Grove London  
 Flat 12 8 Sylvan Grove London  
 Unit 5 Ullswater House Hillbeck Close  
 Flat 12 Radford Court 814 Old Kent Road  
 Flat 9 Radford Court 814 Old Kent Road  
 Flat 7 Radford Court 814 Old Kent Road  
 Unit D 6 Asylum Road London  
 Apartment P 6 Asylum Road London  
 Apartment O 6 Asylum Road London  
 Flat 34 Harry Lamborn House 9 Gervase  
 Street  
 Flat 26 Harry Lamborn House 9 Gervase  
 Street  
 Flat 17 Harry Lamborn House 9 Gervase  
 Street  
 Flat 16 Harry Lamborn House 9 Gervase  
 Street  
 59 Caroline Gardens Asylum Road London  
 79 Caroline Gardens Asylum Road London  
 78 Caroline Gardens Asylum Road London  
 73 Caroline Gardens Asylum Road London  
 108 Caroline Gardens Asylum Road London  
 813 Old Kent Road London Southwark  
 65 Manor Grove London Southwark  
 Unit 28 To 32 Kent Park Industrial Estate  
 Ruby Street  
 724 Old Kent Road London Southwark  
 Flat 9 Bowness House Tustin Estate Hillbeck  
 Close  
 Flat 20 Bowness House Tustin Estate  
 Hillbeck Close  
 Flat 2 Bowness House Tustin Estate Hillbeck  
 Close  
 Flat 14 Bowness House Tustin Estate  
 Hillbeck Close  
 Unit 16 To 18 Kent Park Industrial Estate  
 Ruby Street  
 Flat 24 24 Sylvan Grove London

Flat 19 24 Sylvan Grove London  
 Flat 20 8 Sylvan Grove London  
 Flat 15 8 Sylvan Grove London  
 Flat 9 8 Sylvan Grove London  
 Flat 5 8 Sylvan Grove London  
 10B Sylvan Grove London Southwark  
 Unit 33 Ullswater House Hillbeck Close  
 Unit 10 Ullswater House Hillbeck Close  
 Block A Room 4 Milestone Court 1 Wales Close  
 141 Ormside Street London Southwark  
 Flat 5 Harry Lamborn House 9 Gervase Street  
 Flat 31 Harry Lamborn House 9 Gervase Street  
 65 Caroline Gardens Asylum Road London  
 86 Caroline Gardens Asylum Road London  
 Flat 14 Kentmere House Tustin Estate Manor Grove  
 Flat 32 Bowness House Tustin Estate Hillbeck Close  
 69 Manor Grove London Southwark  
 29 Hillbeck Close London Southwark  
 Flat 28 Bowness House Tustin Estate Hillbeck Close  
 Flat 12 Bowness House Tustin Estate Hillbeck Close  
 Flat 3 721 Old Kent Road London  
 12A Sylvan Grove London Southwark  
 Flat 17 18 Sylvan Grove London  
 Flat 19 8 Sylvan Grove London  
 Flat 4 8 Sylvan Grove London  
 113 Ormside Street London Southwark  
 721 Old Kent Road London Southwark  
 Unit F 6 Asylum Road London  
 Flat 32 Harry Lamborn House 9 Gervase Street  
 Flat 20 Harry Lamborn House 9 Gervase Street  
 66 Caroline Gardens Asylum Road London  
 4A Asylum Road London Southwark  
 92 Caroline Gardens Asylum Road London  
 84 Caroline Gardens Asylum Road London  
 81 Caroline Gardens Asylum Road London  
 Flat 25 Kentmere House Tustin Estate Manor Grove  
 Flat 13 Kentmere House Tustin Estate Manor Grove  
 334 Commercial Way London Southwark  
 73 Manor Grove London Southwark  
 4 Hillbeck Close London Southwark  
 25 Hillbeck Close London Southwark  
 24 Hillbeck Close London Southwark  
 19 Hillbeck Close London Southwark  
 110-116 Ormside Street London Southwark  
 139 Ormside Street London Southwark  
 115-125 Ormside Street London Southwark  
 18 Manor Grove London Southwark  
 Flat 11 Bowness House Tustin Estate Hillbeck Close  
 Flat 1 729 Old Kent Road London  
 The Prince Of Wales 14 Ruby Street London  
 Flat 38 Kentmere House Tustin Estate Manor Grove  
 Flat 26 24 Sylvan Grove London  
 Flat 25 24 Sylvan Grove London  
 Flat 21 24 Sylvan Grove London  
 Flat 10 24 Sylvan Grove London  
 Flat 7 24 Sylvan Grove London  
 Flat 14 18 Sylvan Grove London  
 Flat 3 8 Sylvan Grove London  
 Flat 21 Radford Court 814 Old Kent Road  
 Flat 3 Radford Court 814 Old Kent Road  
 21 Hatcham Road London Southwark  
 Unit 22 Ullswater House Hillbeck Close  
 Upper Ground Floor And First Floor 735 Old Kent Road London  
 Room 8 720 Old Kent Road London  
 Room 1 720 Old Kent Road London  
 147 Ormside Street London Southwark  
 Part First Floor 78-94 Ormside Street London  
 Flat 10 Harry Lamborn House 9 Gervase Street  
 63 Caroline Gardens Asylum Road London  
 77 Caroline Gardens Asylum Road London  
 Flat 30 Kentmere House Tustin Estate Manor Grove  
 Unit 20 Kent Park Industrial Estate Ruby Street  
 Unit 26 Kent Park Industrial Estate Ruby Street  
 Flat 15 Bowness House Tustin Estate Hillbeck Close  
 Flat 11 24 Sylvan Grove London  
 Flat 7 8 Sylvan Grove London  
 Block A Room 6 Milestone Court 1 Wales Close  
 Unit 16 Ullswater House Hillbeck Close  
 Penarth Works Penarth Street London  
 Apartment J 6 Asylum Road London  
 61 Caroline Gardens Asylum Road London  
 90 Caroline Gardens Asylum Road London  
 85 Caroline Gardens Asylum Road London  
 105 Caroline Gardens Asylum Road London  
 102 Caroline Gardens Asylum Road London  
 Flat 15 Kentmere House Tustin Estate Manor Grove  
 Flat 9 Kentmere House Tustin Estate Manor Grove  
 5 Hillbeck Close London Southwark  
 3 Hillbeck Close London Southwark

720 Old Kent Road London Southwark  
Unit 4 709 Old Kent Road London  
Flat 25 Bowness House Tustin Estate  
Hillbeck Close

Flat 22 Bowness House Tustin Estate  
Hillbeck Close

**Re-consultation:**







---

## 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.

---

<b>Applicant</b>	Joseph Homes Limited	<b>Reg. Number</b> 19/AP/2307
<b>Application Type</b>	Full Planning Application	
<b>Recommendation</b>	Grant subject to Legal Agrt, GLA	<b>Case Number</b>

---

### Draft of Decision Notice

---

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

Redevelopment to provide a mixed use development comprising up to 219 residential dwellings (Use Class C3) and up to 2,986sqm (GIA) commercial workspace (Use Class B1) within two buildings of 5 storeys and 32 storeys with associated car and cycle parking, landscaping, and public realm and highways improvements.

**At:** Daisy Business Park, 19-35 Sylvan Grove, London, SE15 1PD

**In accordance with application received on** 29<sup>th</sup> July 2019

**and Applicant's Drawing Nos.:**

DR-0001	Site Location Plan
DR-0002	Existing Site Layout
DR-0010	Existing general Arrangement Plan-Ground Level
DR-0011	Existing general Arrangement Plan-Level 1
DR-0012	Existing Elevations
DR-0050 A	Proposed General Arrangement Plan - Site Layout
DR-0100 C	Proposed General Arrangement Plan - Ground Level
DR-0101 B	Proposed General Arrangement Plan - Level 01
DR-0102 A	Proposed General Arrangement Plan - Levels 02-05
DR-0106 A	Proposed General Arrangement Plan - Level 06
DR-0107 A	Proposed General Arrangement Plan - Levels 07-08
DR-0109 A	Proposed General Arrangement Plan - Levels 09-11
DR-0112 B	Proposed General Arrangement Plan - Levels 12-20
DR-121	Proposed General Arrangement Plan - Levels 21-24
DR-0125 A	Proposed General Arrangement Plan - Levels 25-31
DR-0132 B	Proposed General Arrangement Plan - Roof Level
DR-0140 B	Landscape Masterplan
DR-0150 A	Site Elevation - East - Existing Context
DR-0151 A	Site Elevation - South - Existing Context
DR-0152 B	Site Elevation - West - Existing Context
DR-0153 A	Site Elevation - North - Existing Context
DR-0154 A	Site Elevation - East - Future Context
DR-0155 B	Site Elevation - West - Future Context
DR-0156 A	Site Elevation - North - Future Context
DR-0160 A	Site Section South-North
DR-0161 A	Site Section East-West
DR-0162 A	Site Section East-West (Through Commercial Building)
DR-0170 A	Detailed Elevation (Commercial Building)
DR-0171 A	Detailed Elevation (Residential Tower)
DR-0172 A	Detailed Elevation (Tower Top)
DR-0173	Detailed Elevation-Residential Entrances
DR-0174	Detailed Elevation-Residential Entrances
DR-0175	Detailed Section-Residential Entrances
DR-0176	Detailed Section-Residential Entrances
DR-0200 C	Proposed Building Plan - Ground Level
DR-0201 B	Proposed Building Plan - Level 01
DR-0202 B	Proposed Building Plan - Levels 02 -05
DR-0206 B	Proposed Building Plan - Level 06
DR-0207 B	Proposed Building Plan - Levels 07-08

DR-0209 B	Proposed Building Plan - Levels 09-11
DR-0212 C	Proposed Building Plan - Levels 12-20
DR-221	Proposed Building Plan - Levels 21-24
DR-0225 B	Proposed Building Plan - Levels 25-31
DR-0232 A	Proposed Building Plan - Roof Level
DR-0233 A	Proposed Building Plan - Roof View
TR009 1 of 2	Swept Path Analysis
TR009 2 of 2	Swept Path Analysis
TR006 E 1 of 7	Swept Path Analysis Large Car
TR006 E 2 of 7	Swept Path Analysis Large Car
TR006 E 3 of 7	Swept Path Analysis Large Car
TR006 E 4 of 7	Swept Path Analysis Large Car
TR006 E 5 of 7	Swept Path Analysis Large Car
TR006 E 6 of 7	Swept Path Analysis Large Car
TR006 E 7 of 7	Swept Path Analysis Large Car

Supporting documents:

Air Quality Assessment, BREEAM Pre-assessment Report, (Built) Heritage, Townscape & Visual Impact Analysis, Daylight and Sunlight Report July 2019, Sylvan Grove Internal Daylight Addendum Letter February 2020, Overshadowing Report - Development Amenity Spaces February 2020, Overshadowing Report on Surrounding Properties February 2020, Daylight and Sunlight for Sylvan Grove letter dated May 2020, Design, Access and Landscape Statement July 2019, Design, Access and Landscape Statement Addendum July 2020, Draft Residential Travel Plan, Draft Workplace Travel Plan, Draft Delivery and Servicing Plan, Energy Assessment Updated Version B May 2020, Engagement Summary and Development Consultation Charter,, Drainage Strategy Report December 2019, Fire Strategy, Flood Risk Assessment, Historic Environment Assessment, Internal Daylight and Sunlight Report July 2019, Noise Impact Assessment, Odour Assessment December 2019, Outline Construction Logistics Plan, Pedestrian Level Wind Microclimate Assessment, Phase 1 Environmental Risk Assessment, Planning Statement, Preliminary Ecological Appraisal, Socio-Economic Technical Report, Statement of Community Involvement, Transport Assessment, Tree Survey and Arboricultural Report, Viability Assessment Executive Summary, Economic Viability Appraisal Report, Proposed Scheme Appraisal (May Update) by BNPP

Schedule of Accommodation \_Individual Room Sizes Schedule February 2020

**Subject to the following 39 conditions:**

**Time limit for implementing this permission and the approved plans**

1 Approved Plans

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

DR-0050 A Proposed General Arrangement Plan - Site Layout  
 DR-0100 C Proposed General Arrangement Plan - Ground Level  
 DR-0101 B Proposed General Arrangement Plan - Level 01  
 DR-0102 A Proposed General Arrangement Plan - Levels 02-05  
 DR-0106 A Proposed General Arrangement Plan - Level 06  
 DR-0107 A Proposed General Arrangement Plan - Levels 07-08  
 DR-0109 A Proposed General Arrangement Plan - Levels 09-11  
 DR-0112 B Proposed General Arrangement Plan - Levels 12-20  
 DR-121 Proposed General Arrangement Plan - Levels 21-24  
 DR-0125 A Proposed General Arrangement Plan - Levels 25-31  
 DR-0132 A Proposed General Arrangement Plan - Roof Level  
 DR-0154 A Site Elevation - East - Future Context  
 DR-0155 B Site Elevation - West - Future Context  
 DR-0156 A Site Elevation - North - Future Context  
 DR-0160 A Site Section South-North  
 DR-0161 A Site Section East-West  
 DR-0162 A Site Section East-West (Through Commercial Building)  
 DR-0170 A Detailed Elevation (Commercial Building)  
 DR-0171 A Detailed Elevation (Residential Tower)  
 DR-0172 A Detailed Elevation (Tower Top)  
 DR-0173 Detailed Elevation-Residential Entrances  
 DR-0174 Detailed Elevation-Residential Entrances

DR-0175 Detailed Section-Residential Entrances  
 DR-0176 Detailed Section-Residential Entrances  
 DR-0200 C Proposed Building Plan - Ground Level  
 DR-0201 B Proposed Building Plan - Level 01  
 DR-0202 B Proposed Building Plan - Levels 02 -05  
 DR-0206 B Proposed Building Plan - Level 06  
 DR-0207 B Proposed Building Plan - Levels 07-08  
 DR-0209 B Proposed Building Plan - Levels 09-11  
 DR-0212 C Proposed Building Plan - Levels 12-20  
 DR-0221 Proposed Building Plan - Levels 21-24  
 DR-0225 B Proposed Building Plan - Levels 25-31  
 DR-0232 A Proposed Building Plan - Roof Level  
 DR-0233 A Proposed Building Plan - Roof View

Reason:

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

## 2 Time Limit

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

Reason:

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

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

## 3 Contamination

- a) Prior to the commencement of development works other than demolition, an intrusive site investigation and associated risk assessment shall be completed to fully characterise the nature and extent of any contamination of soils and ground water on the site, including soil gases/vapours.
- b) In the event that contamination is found that presents a risk to future users or controlled waters or other receptors, a detailed remediation and/or mitigation strategy shall be prepared and submitted to the Local Planning Authority for approval in writing. The strategy shall detail all proposed actions to be taken to bring the site to a condition suitable for the intended use together with any monitoring or maintenance requirements. The scheme shall also ensure that as a minimum, the site should not be capable of being determined as contaminated land under Part IIA 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 and implemented as part of the development.
- c) Following the completion of the works and measures identified in the approved remediation strategy, a verification report providing evidence that all works required by the remediation strategy have been completed, together with any future monitoring or maintenance requirements, shall be submitted to and approved in writing by the Local Planning Authority.
- d) In the event that potential contamination is found at any time when carrying out the approved development that was not previously identified, it shall be reported in writing immediately to the Local Planning Authority, and a scheme of investigation and risk assessment, a remediation strategy and verification report (if required) shall be submitted to the Local Planning Authority for approval in writing, in accordance with a-c above.

Reason:

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with saved policy 3.2 'Protection of amenity' of the Southwark Plan (2007), strategic policy 13' High environmental standards' of the Core Strategy (2011) and the National Planning Policy Framework 2019.

## 4 Tree Protection Measures

Prior to works commencing, including any demolition, an Arboricultural Method Statement 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 Saved Policies 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity of the Southwark Plan 2007; SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards of the Core Strategy (2011) and the National Planning Policy Framework 2019.

#### 5 Archaeological Mitigation

Prior to commencement of development (including demolition), the applicant shall secure the implementation of a programme of archaeological mitigation works in accordance with a written scheme of investigation, which shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In order that the details of the programme of works for the archaeological mitigation are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site in accordance with Saved Policy 3.19 Archaeology of the Southwark Plan (2007); Strategic Policy 12 - Design and Conservation of The Core Strategy (2011), and the National Planning Policy Framework 2019.

#### 6 Archaeological Foundation

Prior to commencement of development (including 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 Saved Policy 3.19 Archaeology of the Southwark Plan (2007); Strategic Policy 12 - Design and Conservation of The Core Strategy (2011), and the National Planning Policy Framework 2019.

#### 7 Archaeological Building Recording

Prior to commencement of development (including demolition), hereby authorised begins, the applicant or successors in title shall secured the implementation of a programme of archaeological building recording in accordance with a written scheme of investigation, which shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In order that the archaeological operations are undertaken to a suitable standard as to the details of the programme of works for the archaeological building recording in accordance with Saved Policy 3.19 Archaeology of the Southwark Plan (2007); Strategic Policy 12 - Design and Conservation of The Core Strategy (2011), and the National Planning Policy Framework 2019.

#### 8 Secure By Design Application

Prior to commencement of development above grade, submission of details for Secure By Design, in correspondence with the Metropolitan Police, along with details of security measures proposed, shall be submitted

and approved in writing by the Local Planning Authority. These measures shall be implemented in accordance with the approved details prior to occupation.

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 Saved Policy 3.14 Designing out crime of the Southwark Plan (2007); Strategic Policy 12 - Design and Conservation of The Core Strategy (2011) and The National Planning Policy Framework 2019..

## 9 Surface Water Drainage

Prior to commencement of development (excluding superstructure demolition), the final detailed design for the proposed surface water drainage system incorporating Sustainable Drainage Systems (SuDS) have been submitted to and approved in writing by the Local Planning Authority, including detailed design, size and location of attenuation units and details of flow control measures. The strategy should achieve the greenfield runoff rate of 2.2 l/s as detailed in the Drainage Strategy prepared by Ramboll dated 15/05/2020. The applicant must demonstrate that the site is safe in the event of blockage/failure of the system, including consideration of exceedance flows. The site drainage must be constructed to the approved details.

Reason:

To minimise the potential for the site to contribute to surface water flooding in accordance with Southwark's Strategic Flood Risk Assessment (2017) and Policy 5.13 of the London Plan (2016).

## 10 Tree Planting

Prior to the commencement of works above grade, and subject to Section 278 negotiations with the Council, full details of all proposed tree and shrub planting as shown in the approved plans (minimum of 16 trees plus two on-street trees on Sylvan Grove) 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 and defect period. All tree planting shall be carried out in accordance with those details and at those times. Planting shall comply with BS5837: Trees in relation to demolition, design and construction (2012) and BS: 4428 Code of practice for general landscaping operations.

If within a period of five years from the date of the planting of any tree that tree, or any tree planted in replacement for it, is removed, uprooted or destroyed or dies, or becomes, in the opinion of the local planning authority, seriously damaged or defective, another tree of the same species and size as that originally planted shall be planted at the same place in the first suitable planting season., unless the local planning authority gives its written consent to any variation.

Reason:

To ensure the proposed development will preserve and enhance the visual amenities of the locality and is designed for the maximum benefit of local biodiversity, in addition to the attenuation of surface water runoff in accordance with Saved Policies 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity of The Southwark Plan (2007); Strategic Policies 11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards of the Core Strategy (2011) and The National Planning Policy Framework 2019.

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

## 11 Bat and Bird Boxes

Prior to the commencement of works above grade, the proposed bird and bat nesting boxes including the exact location, specification and design of the habitats shall be submitted to and approved in writing by the Local Planning Authority.

No less than 6 house sparrow terraces and 6 bat tubes shall be provided and the details shall include the exact location, specification and design of the habitats. The features shall be installed within the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained.

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

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with Saved Policy 3.28 Biodiversity of The Southwark Plan (2007); Strategic Policy 11 Open spaces and wildlife of the Core Strategy (2011); Policy 7.19 of the London Plan (2016) and The National Planning Policy Framework 2019.

## 12 Wheelchair Units

Prior to the commencement of works above grade, the applicant shall submit written confirmation from the appointed building control body that the specifications for each dwelling identified in the detailed construction plans meet the standard of the Approved Document M of the Building Regulations (2015) required in the schedule below and as corresponding to the approved floor plans. The development shall be carried out in accordance with the details thereby approved by the appointed building control body.

M4 (Category 2) 'accessible and adaptable':- 13 units – (Flats 11.6, 12.6, 13.6, 14.6, 15.6, 16.6, 17.6, 18.6, 19.6, 20.6, 21.6, 22.6, 23.6)

M4 (Category 3(b) 'wheelchair user dwellings'.- 9 units – (Flats 1.2, 1.3, 2.2, 2.3, 3.2, 3.3, 4.2, 4.3, 5.2)

Reason:

In order to ensure the development complies with Strategic Policy 5 Providing new homes of The Core Strategy (2011) and Policy 3.8 Housing choice of The London Plan (2016).

## 13 Mock Ups

Prior to the commencement of works above grade hereby approved, a typical elevational mock-up of the development façades 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 that the Local Planning Authority may be satisfied as to the design and details in accordance with Saved Policies 3.12 Quality in Design; 3.13 Urban Design; and 3.20 Tall buildings of The Southwark Plan (2007); Strategic Policy 12 Design & Conservation of the Core Strategy (2011) and The National Planning Policy Framework 2019.

## 14 Detail Drawings

Prior to commencement of works above grade of the development hereby authorised, detail drawings at a scale of 1:10 through:

- i) all facade variations; and
- ii) commercial and residential entrances; and
- iii) all parapets and roof edges; and
- iv) all balcony details; and
- v) heads, cills and jambs of all openings

to be used in the carrying out of this permission shall be submitted to and approved by the Local Planning Authority in writing. The development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order that the Local Planning Authority may be satisfied as to the quality of the design and details in accordance with Saved Policies 3.12 Quality in Design and 3.13 Urban Design of The Southwark Plan (2007); Strategic Policy 12 Design & Conservation of the Core Strategy (2011) and The National Planning Policy Framework 2019.

## 15 Material Samples

Prior to the commencement of works above grade hereby authorised, samples of all external facing materials to be used in the carrying out of this permission shall be presented on site to the Local Planning Authority and approved in writing. The development shall not be carried out otherwise than in accordance with any such approval given.

## Reason:

In order that the Local Planning Authority may be satisfied that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing in accordance with Saved Policies 3.12 Quality in Design and 3.13 Urban Design of The Southwark Plan (2007); Strategic Policy 12 Design & Conservation of the Core Strategy (2011) and The National Planning Policy Framework 2019.

## 16 Hard and soft landscaping

Prior to commencement of works above grade hereby authorised, detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings (including details of the play space, play equipment, communal roof terrace, 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 play equipment shall be provided in accordance with the details thereby approved prior to the occupation of the residential units. All play space and communal amenity space within the development shall be available to all residential occupiers of the development in perpetuity.

The landscape scheme must be designed to mitigate against the adverse impacts of wind, and the submitted details must demonstrate that the appropriate Lawson Safety Method and Lawson Comfort Method criteria shall be achieved.

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

## Reason

So that the Council may be satisfied with the details of the landscaping scheme in accordance with Saved Policies 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity of the Southwark Plan (2007); Strategic Policies SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards of The Core Strategy (2011) and The National Planning Policy Framework 2019.

## 17 Flow Rates

Prior to commencement of development (excluding demolition and site preparation works), the specific flow rates for the sanitary ware and water consuming appliances for each of the dwelling types shall be provided to the Local Authority for approval in writing. All dwellings shall be designed to not to exceed 105 litres per person per day (internal water usage), which is equivalent to the 'optional' requirement of the Building Regulations Part G (105 litres/person/day for internal water usage plus 5 litres/person/day for outdoor external usage = 110 litres/person/day). The development shall not be carried out otherwise than in accordance with any such approval given.

## Reason:

To ensure the development complies with Saved policies 3.3 Sustainability and Energy Efficiency of the Southwark Plan (2007); Strategic Policy 13 High environmental standards of the Core Strategy (2011) and the National Planning Policy Framework 2019.

## 18 Cycle Storage

Prior to commencement of development above grade, 1:50 scale drawings of the facilities to be provided for the secure and covered storage of cycles shall be submitted to and approved in writing by the Local Planning Authority.

Thereafter the cycle parking facilities provided shall be retained and the space used for no other purpose and the development shall not be carried out otherwise in accordance with any such approval given.

## Reason:

In order to ensure that satisfactory safe and secure cycle parking facilities are provided and retained in order to encourage the use of cycling as an alternative means of transport to the development and to reduce reliance on the use of the private car in accordance with Saved Policy 5.3 Walking and Cycling of the Southwark Plan (2007); Strategic Policy 2 Sustainable Transport of The Core Strategy (2011) and The National Planning Policy Framework 2019,

## 19 Refuse Storage

Prior to first occupation of the building hereby approved, details of the refuse collection arrangements shall be submitted to and approved by the Local Planning Authority. The development shall be operated in accordance with the approved collection arrangements for the duration of the development.

The refuse storage shall be provided as detailed on the drawings hereby approved and shall be made available for use by the occupiers of the premises prior to the first occupation of the building. 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 and collected regularly thereby protecting the amenity of the site and the area in general from litter, odour and potential vermin/pest nuisance in accordance with: Saved Policies 3.2 Protection of Amenity and 3.7 Waste Reduction of the Southwark Plan (2007); Strategic Policy 13 High Environmental Standards of the Core Strategy (2011) and the National Planning Policy Framework 2019.

## 20 Green, Brown and Blue Roofs

i) Prior to commencement of development above grade, details of the biodiverse green, brown and blue roofs shall be submitted to and approved in writing by the Local Planning Authority. The roofs shall be:

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

The green, brown and blue roofs shall be carried out strictly in accordance with the details approved and shall be maintained as such thereafter.

## Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with Saved Policy 3.28 Biodiversity of The Southwark Plan (2007); Strategic Policy 11 Open spaces and wildlife of the Core Strategy (2011); Policy 7.19 of the London Plan (2016) and The National Planning Policy Framework 2019.

## 21 Fit Out of B1 (c) Units

Before any work above grade hereby approved begins (excluding demolition), full particulars shall be submitted to and approved by the Local Planning Authority of a scheme showing that the parts of the commercial floorspace to be used for B1c light industrial purposes will be fitted-out to an appropriate level for B1c light industrial use. The particulars referred to in the preceding sentence shall include details of the mechanical and electrical fit-out of the units, heating and cooling provision, sprinklers, and the provision of kitchen and toilet facilities and notwithstanding all permitted development rights shall remain in light industrial use.

The facilities approved shall be installed unless otherwise agreed in writing, and practical completion of the B1c light industrial 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 Saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007); Strategic Policy 1.2 Strategic and local preferred industrial locations of The Core Strategy (2011) and the National Planning Policy Framework 2019.

## 22 Contamination

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority 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. Any contamination be identified that could present an unacceptable risk to controlled waters in accordance with Saved Policies 3.1 Environmental Effects, 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 2019.

**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.

23 Electric Vehicle Charging Points

Prior to first occupation of the development hereby approved, the installation of at least two active and four active electric vehicle charger points within the car parking area shall be installed and shall not be carried out otherwise in accordance with any such approval given.

Reason:

To encourage more sustainable travel in accordance with Saved Policies 3.1 Environmental Effects and 5.2 Transport Impacts of the Southwark Plan (2007); Strategic Policy 2 Sustainable Transport of The Core Strategy (2011) The National Planning Policy Framework 2019.

24 Off Street Parking

Prior to occupation of the building hereby authorised begins the 6 No. off street wheelchair accessible parking bays shall be provided and be retained and the space used for no other purpose and the development shall not be carried out otherwise in accordance with any such approval given.

Reason:

In order to ensure that satisfactory car parking facilities are provided for disabled residents, the re-provided car hire business and the proposed car club, in accordance with Saved Policies 5.5 Car Parking, 5.7 Parking Standards for disabled people and the mobility impaired and 5.8 Other Parking of the Southwark Plan (2007); Strategic Policy 2 - Sustainable Transport of The Core Strategy (2011) and The National Planning Policy Framework 2019.

25 BREEAM

- a) Prior to commencement of internal 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;
- b) Prior to first occupation of the commercial premises 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 Saved Policies 3.3 Sustainability and 3.4 Energy Efficiency of the Southwark Plan (2007); Strategic Policy 13 High Environmental Standards of The Core Strategy (2011) and The National Planning Policy Framework 2019.

26 Secure By Design Certification

Prior to first occupation of the building hereby permitted evidence that Secure By Design Accreditation has been awarded by the Metropolitan Police and that all approve security measures have been implemented shall be submitted to and approved by the Local Planning Authority.

Reason:

In pursuance of the Local Planning Authority's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention in accordance with Saved Policy 3.14 Designing out crime of the Southwark Plan (2007);

Strategic Policy 12 - Design and Conservation of The Core Strategy (2011) and The National Planning Policy Framework 2019..

27 Marketing Material

Prior to occupation, details of the marketing materials for sale and rental properties shall be submitted and approved in writing by the local planning authority clearly identifying the development as car free and that all new residents should sign acknowledgement of the permit free status of their new home.

Reason

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

28 Ecology

The measures for the mitigation of impact and enhancement of biodiversity, set out in the Preliminary Ecological Appraisal shall be implemented in full prior to occupation. The timing of vegetation clearance works shall adhere to the above. Works to the arches should take place between September and January. If evidence of nesting birds is identified, work shall stop and a suitable no-work buffer zone around the nest area should be installed, until such a time when chicks have fledged.

Reason: To increase the biodiversity of the site, to mitigate any impact from the development hereby approved and to comply with Saved Policy 3.28 Biodiversity of The Southwark Plan (2007); Strategic Policy 11 Open spaces and wildlife of the Core Strategy (2011); Policy 7.19 of the London Plan (2016) and The National Planning Policy Framework 2019..

29 Noise Transfer

The habitable rooms within the development that share a party wall element with adjoining flats shall be designed and constructed to provide sufficient resistance to the transmission of sound sufficient to ensure that the party wall meets a minimum of 5dB improvement from the Building Regulations standard set out in Approved Document E.

- a) A written report shall be submitted to and approved by the Local Planning Authority detailing these measures. The approved scheme shall be implemented prior to the commencement of the use hereby permitted and shall be permanently maintained thereafter. The development shall be carried out in accordance with the approval given.
- b) Prior to occupation a validation test shall be carried out on a relevant sample of premises following completion of the development. The results shall be submitted to the LPA in writing for approval.

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 adjacent premises 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 2019.

30 Noise Transfer Between Commercial and Residential Uses

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 when measured as an LAeq across any 5 minute period.

- a) A report shall be submitted in writing to and approved by the LPA detailing acoustic predictions and mitigation measures to ensure the above standard is met. The development shall be carried out in accordance with the approval given.
- b) Following completion of the development and prior to occupation, a validation test shall be carried out on a relevant sample of premises. The results shall be submitted to the LPA for approval in writing and the approved scheme 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 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 2019.

## 31 Residential Noise Levels

The dwellings hereby permitted shall be designed to ensure that the following internal noise levels are not exceeded due to environmental noise:

Bedrooms - 35dB LAeq T†, 30 dB L Aeq T\*, 45dB LAFmax T \*

Living and Dining rooms- 35dB LAeq T †

\* - Night-time - 8 hours between 23:00-07:00

† - Daytime - 16 hours between 07:00-23:00

Following completion of the development and prior to occupation, a validation test shall be carried out on an appropriate sample of premises to demonstrate that the above requirements have been met. The results shall be submitted to the LPA for approval in writing. The approved scheme shall be implemented and permanently maintained thereafter.

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 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 2019.

## 32 External lighting

Any external lighting system installed at the development shall comply with the Institute of Lighting Professionals (ILE) Guidance Note 1 for the reduction of obtrusive light (2020). Details of any external lighting (including: design; power and position of luminaries; light intensity contours) of all affected external areas (including areas beyond the boundary of the development) shall be submitted to and approved by the Local Planning Authority in writing before any such lighting is installed. The development shall not be carried out otherwise than 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 amenity and privacy of adjoining occupiers, and their protection from light nuisance, in accordance with Saved Policies 3.2 Protection of Amenity and 3.14 Designing out crime of the Southwark Plan (2007); Strategic Policy 12 Design and Conservation and Strategic Policy 13 High environmental standards of The Core Strategy (2011) and The National Planning Policy Framework 2019.

**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.

## 33 Land Use

Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order and any associated provisions of the Town and Country Planning General Permitted Development Order (including any future amendment or enactment of those Orders), the Class B1 use hereby permitted shall only be for Class B1(a), (b) or (c) uses. At least 1,885sqm floor space must be provided as B1 (c) use.

Reason:

In granting this permission the Local Planning Authority has had regard to the special circumstances of this case in accordance with Saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007); Strategic Policy 1.2 Strategic and local preferred industrial locations of The Core Strategy (2011) and the National Planning Policy Framework 2019.

## 34 Energy Efficiency

The development hereby permitted shall be constructed to include the energy efficiency measures, air source heat pumps and photovoltaic panels as stated in the Energy Assessment by Twinn Sustainability Innovation submitted in support of the application. All measures and technologies shall remain for as long as the development is occupied, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure the development complies with Strategic Policy 13 High Environmental Standards of the Core Strategy (2011); Policy 5.7 Renewable Energy of the London Plan (2016) and National Planning Policy Framework 2019.

## 35 Roof Plant, Equipment or Other Structures,

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

## Reason:

In order to ensure that no additional plant is placed on the roof of the building in the interest of the appearance and design of the building and the visual amenity of the area in accordance with Saved Policies 3.2 Protection of Amenity and 3.13 Urban Design of the Southwark Plan (2007); Strategic Policy 12 - Design and Conservation of The Core Strategy (2011) and The National Planning Policy Framework 2019.

## 36 Piling

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

## Reason:

Piling or other penetrative methods of foundation design on contaminated sites can potentially result in unacceptable risks to underlying groundwaters in accordance with Saved Policies 3.1 Environmental Effects, 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 2019.

## 37 Servicing Hours

Any deliveries or collections to the commercial units shall only be between the following hours: 08.00 to 20.00hrs on Monday to Saturday and 10.00 to 16.00hrs on Sundays & Bank Holidays

## Reason:

To safeguard the amenity of neighbouring residential properties in accordance with Saved Policies 3.1 Environmental Effects, 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 2019.

## 38 The Rated sound level from any plant, together with any associated ducting, shall not exceed the Background sound level (LA90 15min) at the nearest noise sensitive premises. Furthermore, the Specific plant sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific Sound levels shall be calculated fully in accordance with the methodology of BS4142:2014+A1:2019.

## 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 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 2019.

**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).

## 39 The buildings hereby approved shall have the following maximum storey heights, Commercial Building - 5 storeys (25.6m AOD) and residential building - 32 storeys (107.8m AOD).

## Reason:

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

**Statement of positive and proactive action in dealing with the application**

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

**OPEN****COMMITTEE:****PLANNING COMMITTEE****MUNICIPAL YEAR 2020-21****NOTE:**

Original held in Constitutional Team; all amendments/queries to Tim Murtagh/Gerald Gohler, Constitutional Team, Tel: 020 7525 7187/7420

**OPEN**

<b>COPIES</b>		<b>COPIES</b>	
<b>MEMBERS</b>		<b>PLANNING TEAM</b>	
Councillor Martin Seaton (Chair)	1	Simon Bevan (label provided)	1
Councillor Kath Whittam (Vice-Chair)	1	Wing Lau/Vicky Lewis (labels provided)	2
Councillor Barrie Hargrove	1	Joyce Rowe-Jones/Sandra Warren	1
Councillor Adele Morris	1		
Councillor Margy Newens	1		
Councillor Damian O'Brien	1		
Councillor Catherine Rose	1	<b>COMMUNITY SAFETY AND ENFORCEMENT TEAM</b>	
Councillor Cleo Soanes	1	Sarah Newman	1
<b>Electronic Copies (No paper)</b>			
Councillor Eleanor Kerslake (Reserve)		<b>COMMUNICATIONS TEAM</b>	
Councillor Sarah King (Reserve)		Louise Neilan	1
Councillor Richard Livingstone (Reserve)			
Councillor James McAsh (Reserve)		<b>LEGAL TEAM</b>	
Councillor Hamish McCallum (Reserve)		Jonathan Gorst	1
Councillor Darren Merrill (Reserve)			
Councillor Jason Ochere (Reserve)		<b>CONSTITUTIONAL TEAM - Electronic Copies (No paper)</b>	
Councillor Jane Salmon (Reserve)		Tim Murtagh/Gerald Gohler	
<b>MEMBER OF PARLIAMENT (Paper and Electronic)</b>		<b>TOTAL PRINT RUN</b>	<b>16</b>
Helen Hayes MP, House of Commons, London, SW1A 0AA	1		
		List Updated: 9 July 2020	