

Planning Committee

Wednesday 6 January 2021 6.30 pm

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

Membership

Councillor Martin Seaton (Chair) Councillor Darren Merrill (Vice-Chair) Councillor Richard Livingstone Councillor Damian O'Brien Councillor Cleo Soanes Councillor Dan Whitehead Councillor Kath Whittam Councillor Bill Williams

Reserves

Councillor Radha Burgess
Councillor Victor Chamberlain
Councillor Jon Hartley
Councillor Nick Johnson
Councillor James McAsh
Councillor Margy Newens
Councillor Jason Ochere
Councillor Catherine Rose

INFORMATION FOR MEMBERS OF THE PUBLIC

Access to information

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

Babysitting/Carers allowances

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

Access

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

Contact: Tim Murtagh - email: tim.murtagh@southwark.gov.uk

Members of the committee are summoned to attend this meeting

Eleanor KellyChief Executive

Date: 17 December 2020





Planning Committee

Wednesday 6 January 2021 6.30 pm

Online/Virtual: Members of the public are welcome to attend the meeting. Please contact 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. APOLOGIES

To receive any apologies for absence.

2. CONFIRMATION OF VOTING MEMBERS

A representative of each political group will confirm the voting members of the committee.

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

In special circumstances, an item of business may be added to an agenda within five clear days of the meeting.

4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

Members to declare any personal interests and dispensation in respect of any item of business to be considered at this meeting.

5. **MINUTES** 6 - 10

To approve as a correct record the minutes of the meeting held on 1 December 2020.

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

EXCLUSION OF PRESS AND PUBLIC

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

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

Date: 17 December 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
 - o Confirm whether their views have been accurately reflected in the report
 - o 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 <u>constitutional</u> team at <u>Constitutional.Team@southwark.gov.uk</u> 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 <u>constitutional team</u> at <u>Constitutional.Team@southwark.gov.uk</u> 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

email: tim.murtagh@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 Southwark 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

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 via constitutional.team@southwark.gov.uk



Planning Committee

MINUTES of the virtual Planning Committee held on Tuesday 1 December 2020 at 6.30 pm.

PRESENT: Councillor Martin Seaton (Chair)

Councillor Darren Merrill (Vice-Chair)

Councillor Richard Livingstone Councillor Damian O'Brien Councillor Cleo Soanes Councillor Dan Whitehead Councillor Kath Whittam Councillor Bill Williams

OFFICER
SUPPORT:

Simon Bevan (Director of Planning)

Jon Gorst (Head of Regeneration & Development Team

(Legal Services))

Colin Wilson (Head of Regeneration Old Kent Road) . Yvonne Lewis (Group Manager Strategic Applications)

Terence McLellan (Planning Officer)

Troy Davies (Planning Officer)

Richard Craig (Team Leader, Design and Conservation)

Alex Oyebade (Team Leader Transport Policy)

Naima Ihsan (Transport Planner) 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

7

meeting.

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

The chair announced that the following additional documents had been circulated before the meeting:

Supplemental Agenda No.1 containing the members' pack and the addendum report 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 3 November 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 25 LAVINGTON STREET, LONDON SE1 0NA

Planning application number: 20/AP/1009

PROPOSAL

Redevelopment of the site including partial demolition of existing buildings and

erection of two buildings including basement and above ground development of 10 and 15 storeys (in addition to plant) to provide office use (Class B1), retail use (Class A1), flexible retail and leisure (A1/A3, A3/A4, D2/A3/A4), landscaping, public realm, highway works, disabled car parking, cycle parking, plant and associated works.

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

There were no objectors wishing to address the committee.

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

At 7.27pm the meeting took a screen break and resumed at 7.35pm.

There were no supporters who lived within 100 metres of the development site, or ward councillors, who wished to speak.

Following this, the committee put further questions to the officers and discussed the application.

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

RESOLVED:

- 1. That planning permission be granted subject to conditions as set out in the report and addendum report, the applicant entering into an appropriate legal agreement and referral to the Mayor of London.
- 2. That in the event that the requirements of paragraph 1 above are not met by 31 March 2021, the director of planning be authorised to refuse planning permission, if appropriate, for the reason set out under paragraph 247 of the report.

6.2 14-22 OSSORY ROAD, LONDON SE1 5AN

Planning application number: 19/AP/7610

PROPOSAL

Demolition of the existing building and redevelopment of the site to deliver a building of part 10 part 11 storeys (43.2m AOD) comprising 1,438 sqm of light industrial floorspace across the basement, ground, and first floors; 71 residential units (35.38% by habitable rooms) across the upper floors; and associated outdoor communal amenity space, disabled car parking, cycle storage, refuse storage, and

landscaping.

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

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

An objector addressed the committee and responded to questions put by the committee.

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

At 8.45 pm the meeting took a five-minute screen break.

There were no supporters who lived within 100 metres of the development site, or ward councillors, who wished to speak.

Following this, the committee put further questions to the officers and discussed the application.

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

RESOLVED:

- A. That planning permission be granted, subject to the conditions set out in the report and addendum report, and referral to the Mayor of London, and the applicant entering into an appropriate legal agreement by no later than 1 June 2021.
- B. That the environmental information be taken into account as required by Regulation 30 of the Town and Country Planning (Environmental Impact Assessments) Regulations 2017.
- C. That following issue of the decision it be confirmed that the director of planning shall place a statement on the Statutory Register pursuant to Regulation 30 of the Town and Country Planning (Environmental Impact Assessments) Regulations and that for the purposes of Regulation 30(1)(d) the main reasons and considerations on which the Local Planning Authority's decision is based shall be set out as in this report.
- D. That in the event that the requirements of (A) are not met by 1 June 2021, the director of planning be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 238 of the report.

The meeting ended at 9.15 pm.
CHAIR:

Item No. 6.	Classification: Open	Date: 6 January 2021	Meeting Name: Planning Committee	
Report title:		Proposed new Conservation Areas: The Old Kent Road High Street; Yates Estate and Victory; The Mission; Livesey; and Commercial Way		
Ward(s) or groups affected:		Old Kent Road; Faraday; North Walworth; and South Bermondsey		
From:		Director of Planning		

RECOMMENDATIONS

- 1. That the planning committee agrees to consult publically on the potential new conservation areas and draft conservation area appraisals, management plans, extensions to conservation areas and article 4(1) directions at appendices 2 to 6 for the following conservation areas:
 - The Old Kent Road High Street;
 - Yeats Estate and Victory;
 - The Mission:
 - Livesey; and
 - Commercial Way
- 2. That the planning committee note the EQIA at Appendix 1.

BACKGROUND INFORMATION

- 3. The Planning (Conservation Areas and Listed Buildings Act) 1990 allows Local Planning Authorities (LPA) to designate conservation areas. Section 71 (1)(2) and (3) of the Act require the LPA to formulate and publish proposals for the preservation and enhancement of conservation areas.
 - "(1) It shall be the duty of a local planning authority from time to time to formulate and publish proposals for the preservation and enhancement of any parts of their area which are conservation areas.
 - (2) Proposals under this section shall be submitted for consideration to a public meeting in the area to which they relate.
 - (3) The local planning authority shall have regard to any views concerning the proposals expressed by persons attending the meeting."
- 4. The National Planning Policy Framework (NPPF) 2019 highlights that the LPA should set out a positive strategy for the conservation and enjoyment of the historic environment. Under the Planning Policy Guidance (PPG), it notes that conservation area appraisals can be used to help local planning

authorities develop a management plan and that good appraisals will consider what features make a positive or negative contribution to the significance of the conservation area. The Historic England guidance note "Conservation Area Appraisals, Designation and Management – Historic England Advice Note 1 (Second Edition)" (February 2019) sets out best practice for appraisals.

- 5. An "article 4 (1) direction" removes permitted development rights, and thus anyone wishing to carry out such a development would require planning permission. The order is made under the section (4) 1 of the Town and Country Planning (General Permitted Development Order) (England) 2015.
- 6. The proposed Old Kent Road High Street Conservation Area is situated at the northern end of the Old Kent Road and extends from the former Thomas A'Beckett pub to the Peabody Estate at the junction with Mandela Way. A sub-area of the proposed conservation area extends to the west along East Street and includes a historic residential quarter around Surrey Square. (See Appendix 2 – Map of proposed Old Kent Road High Street Conservation Area)
- 7. The proposed Yates Estate and Victory Conservation Area is situated mainly in the north-west quadrant of the Opportunity Area and centred on the Henshaw Street/Searles Road and Chatham Street / Darwin Street groups of historic properties but also takes in a number of the open spaces in the area including Victory Park and Salisbury Row Park. (See Appendix 3 Map of proposed Yates Estate and Victory Conservation Area)
- 8. The proposed The Mission Conservation Area is centred on the Grade Listed Pembroke House (The Mission) and takes in the nearby historic properties on Elstead Street and Tisdale Place as well as the listed school and other historic buildings on Flint Street. (See Appendix 4 Map of proposed The Mission Conservation Area)
- 9. The proposed Livesey Conservation Area is a surviving fragment of the Old Kent Road civic townscape around the core of the Opportunity Area. It is centred on the Grade II listed Livesey Library and takes in the historic townscape to the north of of Ethnard Road. (See Appendix 5 – Map of proposed Livesey Conservation Area)
- 10. The proposed Commercial Way Conservation Area is situated mainly on Commercial Way and Bird in Bush Road and extends from the Grade II listed former Kentish Drovers on the Old Kent Road, taking in the listed properties on Commercial Way and including the historic townscape around Bird in Bush Park. (See Appendix 6 – Map of proposed Commercial Way Conservation Area)

KEY ISSUES FOR CONSIDERATION

Summary of main issues

11. The main issues of this are:

a) the ability of the LPA to designate a new conservation area as an area of special architectural or historic interest

Planning Policy

12. Core Strategy 2011 (April)

Strategic Policy 12 Design and Conservation.

13. Southwark Plan 2007 (July)

Saved Policy 3.15 Conservation of the Historic Environment

Saved Policy 3.16 Conservation Areas

Saved Policy 3.18 Setting of Listed Buildings, Conservation Areas and

World Heritage Sites

Saved Policy 3.19 Archaeology

London Plan 2011 (July)

Policy 7.9 Heritage-led regeneration

Policy 7.8 Heritage assets and archaeology

Planning Policy Statements

PPS5 Planning for the Historic Environment.

The draft National Planning Policy Framework (NPPF)

Principles of designation and current guidance

- 13. The proposed Old Kent Road High Street Conservation Area a good example of a traditional high street, with 18th- and 19th-century townhouses, extended at ground floor to the back of footpath with retail shop units. It retains architectural remnants of a busy town centre on a major thoroughfare with a number of public houses, cinemas, fire station and department stores remaining in architectural form, albeit with new uses. It includes traditional 19th-century terraces and mansion blocks built by local developers and philanthropists.
- 14. The proposed Yates Estate and Victory Conservation Area encompasses development that typifies that of the Old Kent Road area with a mix of residential properties, schools, churches and former churches, evidence of former industry, all in one compact neighbourhood. Its late 18th- and early 19th-century urban form includes traces of Searles's Paragon, street layouts and plot widths, and names relating to the Battle of Trafalgar. It also takes in the wholesale 19th-century residential development by local developer Edward Yates who provided purpose built 19th-century terraced housing for lower-middle and working class residents. The area includes fine and typical 'Board' schools, one former and two still in use

- today, former pubs on the periphery of Yates estate terraces, historic places of worship and set within contemporary green open spaces
- 15. The proposed The Mission Conservation Area includes a mix of residential properties, interspersed with municipal, educational, religious and missionary buildings, all in one compact neighbourhood constructed over a short period towards the end of the 19th century. It includes elegant streets of purpose built terraced housing for lower-middle and working class residents, fine and typical 'Board' schools, still in use today, a surviving public house and landmark buildings including the former Flint Street Police Station.
- 16. The proposed Livesey Conservation Area is characterised by its high quality working class tenement housing above shops in fine terraces with largely intact original detailing, materials and architecture. It also includes landmark buildings and architectural set pieces of the Camberwell Library (now Livesey Museum) and Christ Church on Old Kent Road as well as the Royal London Friendly Society building.
- 17. The proposed Commercial Way Conservation Area is typical of early residential development off the Old Kent Road with a mix of urban buildings fronting onto the main road with smaller scale cottages, industry and school buildings located on side streets. It includes intact early 19th-century terraced, semi-detached and detached properties with fine detailing and largely unaltered exteriors. The area encompasses a fine and typical 'Board' school still in use today and open space with trees, landscaping and sports facilities the form of which preserves historic streetscapes.
- 18. Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a duty on the local Planning Authority to determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance and further allows for those areas to be designated as conservation areas. There is a duty on the local planning authority under Section 69 to review areas from time to time to consider whether designation of conservation areas is called for.
- 19. In March 2010 the Government issued PPS 5 'Planning for the Historic Environment' replacing the guidance formerly contained within PPGs 15 and 16. PPS 5 requires, in Policy HE2.1, that Local Authorities have evidence about the historic environment and heritage assets within their area, and that this evidence is publically documented. Designation records, such as Conservation Area assessments, should also be taken into account when determining planning applications.
- 20. In 2011 English Heritage published guidance on conservation area appraisals, 'Understanding Place: Conservation Area Designation, Appraisal and Management'. This sets out the importance of definition

and assessment of a conservation area's character and the need to record the area in some detail. The purpose is to provide a sound basis for rational and consistent judgements when considering planning applications within conservation areas. Conservation area appraisals, once they have been adopted by the council, can help to defend decisions on individual planning applications at appeal. They may also guide the formulation of proposals for the preservation and enhancement of the area.

- 21. The NPPF (2019) continues this policy imperative and stresses in paragraph 186 that: "When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its **special architectural or historic interest**, and that the concept of conservation is not devalued through the designation of areas that lack special interest."
- 22. Designation of a conservation area imposes certain duties on planning authorities. These duties are twofold, firstly, to formulate and publish from time to time, proposals for the preservation and enhancement of the conservation areas in their district and submit them for public consultation. Then secondly, in exercising their planning powers to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation areas. In exercising conservation area controls, local planning authorities are required to pay special attention to the desirability of preserving or enhancing the character or appearance of the area in question and therefore there is a presumption against the demolition of buildings within the area. In the case of conservation area controls, however, account should clearly be taken of the part played in the architectural or historic interest of the area by the building for which demolition is proposed, and in particular of the wider effects of demolition on the building's surroundings and on the conservation area as a whole.

Outstanding Schemes

23. A number of proposals have gained planning permission in each of the 5 proposed conservation areas. The council has prepared draft conservation area appraisals for each of the proposed conservation areas which include details of the consented schemes within each historic area. At the moment the historic fabric remains largely intact and warrants consideration. Proposed development has been piecemeal and, in the main, complemented the historic townscape.

Community impact statement

24. The designation will be consulted in accordance with the Statement of Community Involvement. The Statement of Community Involvement sets out how and when the Council will involve the community in the alteration and development of town planning documents and applications for planning permission and was adopted in January 2008. The Statement of Community Involvement does not require the Council to consult when

- designating a conservation area, but in this instance the Council proposes to follow a similar procedure.
- 24. It is proposed to hold a public meeting within 12 weeks of this committee and to report any consultation responses received back to Members for consideration.
- 25. The consultation will seek the views of local residents, businesses and other local interests over the definition of the boundaries and the conservation area appraisal. Notification of the consultation on the proposed designation and the supporting documents will be put in the local press, on the council's website and will be made available at the Walworth One Stop Shop. This will show how the consultation has complied with the Statement of Community Involvement.

Human rights implications

- 26. This conservation area may engage certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.
- 27. This proposal has the legitimate aim of providing for the conservation of the historic environment within the conservation area. The rights potentially engaged by this proposal, include the right to a fair trial and the right to respect for private and family life however both of these are not considered to be unlawfully interfered with by this proposal.

Resource implications

- 28. Notifying the public of these five proposed new conservation areas will not result in resource implications for the staffing of the Department of the Chief Executive.
- 29. Other resource implications will be the cost of publishing the conservation area appraisal, which can met within the Department of the Chief Executive's revenue budget. The cover price of the document will be fixed to cover production costs.
- 30. The conservation area could generate additional casework for planning staff. However, given the location and scale of many of the proposals in this area there is already an attention to the design and appearance of the proposals and the designation should not result in significant resource implications for the staffing of the Department of the Deputy Chief Executive.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Strategic Director of Finance and Governance

- 31. A conservation area is an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance (section 69(1), Planning (Listed Buildings and Conservation Areas) Act (LBA) 1990). A Local Planning Authority (LPA) is under a duty to designate conservation areas within its locality and to review them from time to time (section 69(2)).
- 32. There is no statutory requirement for LPAs to consult with anyone before a conservation area is designated, nor does the Councils Statement of Community Involvement require consultation in respect of designating Conservation Areas. However, English Heritage advises LPAs to consult as widely as possible, not only with local residents and amenity societies, but also with Chambers of Commerce, Public utilities and Highway authorities.
- 33. There is no formal designation procedure. The statutory procedure simply involves a council resolution to designate being made. The date of the resolution is the date the conservation area takes effect. The designation of conservation areas is reserved to Planning Committee under Part 3F, paragraph 3 of the Constitution, and consultation of Community Council members will take place before the designation is confirmed.
- 34. There is no statutory requirement on the level of detail that must be considered by an LPA before designation. However, guidance from English Heritage states that it is vital an area's special architectural or historic interest is defined and recorded in some detail. A published character appraisal is highly recommended and can be found at Appendix 1 of this report. The overall impetus for designating a conservation area must be the desire to preserve and enhance the area.
- 35. Notice of the designation must be published in at least one local newspaper circulating in the LPA's area and in the London Gazette (section 70(8), LBA 1990). The Secretary of State and English Heritage must also be notified (section 70(5)). There is no requirement to notify the owners and occupiers of premises in the area. The conservation area must be registered as a local land charge (section 69(4)).
- 36. The designation of a conservation area gives the LPA additional powers over the development and the use of land within it and has the following consequences;
 - control of demolition of buildings all demolition will require conservation area consent
 - any new development will need to enhance or preserve the conservation area –
 - protection of trees certain criminal offences arise if trees in the conservation area are cut down or wilfully damaged without the consent of the LPA

- duty of LPA to formulate and publish from time to time proposals for the conservation and enhancement of conservation areas (e.g, by updating conservation area appraisals)
- certain permitted development rights are more restricted
- specific statutory duties on telecommunications operators
- exclusion of certain illuminated advertisements [although not very relevant in this context]
- publicity for planning applications affecting the conservation area must be given under Section 73(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990
- 37. There is no statutory right of appeal against a building being included in a conservation area. However, it is possible to seek a judicial review of an LPA's decision to designate a conservation area.

Equalities and Human Rights

- 38. Positive equalities obligations are placed on local authorities, sometimes described as equalities duties with regard to race, disability and gender.
- 39. Gender equality duties were introduced by the Equality Act 2006, which amended the Sex Discrimination Act 1975. The general duties in summary require local authorities to have due regard to the need to:
 - (a) "eliminate unlawful discrimination and harassment and;
 - (b) promote the equality of opportunity between men and women."

Race equality duties were introduced by the Race Relations Amendment Act 2000 which amended the Race Relations Act 1976. The general duties in summary require local authorities to give due regard to the need to:

- (a) "eliminate unlawful discrimination and harassment;
- (b) promote the equality of opportunity; and
- (c) promote good race relations between people of different racial groups"

Disability equality duties were introduced by the Disability Discrimination Act 2005 which amended the Disability Act 1995. The general duties in summary require local authorities to carry out their functions with due regard to the need to:

- (a) "promote equal opportunities between disabled persons and other persons;
- (b) eliminate discrimination that is unlawful under the Act;

- (c) eliminate harassment of disabled persons that is related to their disabilities:
- (d) promote a positive attitude towards disabled persons;
- (e) encourage participation by disabled persons in public life; and
- (f) take steps to take account of disabled person's disabilities even where that involves treating disabled persons more favourably than other persons."
 - Section 71 of the Race Relations Act 1976, section 49A(i) of the Disability Discrimination Act 1995 and section 76A of the Sex Discrimination Act 1975, require local authorities to act in accordance with the equalities duties and have due regard to these duties when we are carrying out our functions.
- 40. Equalities and Human Rights have been considered as part of the development conservation area appraisal and an Equalities Impact Assessment (EqIA) is in the process of being completed. EqIAs are an essential tool to assist councils to comply with equalities duties and ensure they make decisions fairly.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
None		

APPENDICES

No.	Title
Appendix 1	Equality Impact Assessment
Appendix 2	Map of proposed Old Kent Road High Street Conservation Area
Appendix 3	Map of proposed Yates Estate and Victory Conservation Area
Appendix 4	Map of proposed The Mission Conservation Area
Appendix 5	Map of proposed Livesey Conservation Area
Appendix 6	Map of proposed Commercial Way Conservation Area

AUDIT TRAIL

Lead Officer	Simon Bevan , Director of Planning			
Report Author	Michael Tsoukaris, Group Manager Design and			
	Conservation Officer			
Version	Final			
Dated	23 November 2020			
Key Decision?	Yes			
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES /				
CABINET MEMBER				
Officer Title		Comments Sought	Comments included	
Strategic Director of Finance and		Yes	Yes	
Governance				
Finance Director		No	No	
Cabinet Member		No	No	
Date final report sent to Constitutional Team 14 December 2020				

APPENDIX 1

Equalities Impact Assessment (EqIA)

MEETING:	Planning Committee	Date:	6 January 2021
ITEM TITLE:	Consultation on proposed new Conservation Areas: Thomas A'Becket and High Street Yates Estate and Victory The Mission Livesey Kentish Drovers and Bird in Bush		
REPORT AUTHOR: Contact name, number and email address	Michael Tsoukaris, 020 7525 5392 michael.tsoukaris@southwark.gov.uk		
JOB TITLE & DEPARTMENT	Group Manager, Design & Conservation Officer Chief Executive's Department		

SUMMARY OF CONTENT

A description of the effect of 5 new conservation areas in the Old Kent Road AAP area of the borough. The ways that equalities issues may impact on different groups of people have been highlighted.

KEY ISSUES

- The methods used to involve and engage people affected by the proposed new Thomas A'Becket and High Street, Yates Estate and Victory, The Mission, Livesey, and Kentish Drovers and Bird in Bush Conservation Areas and how this needs to be accessible to all.
- The adoption of the Thomas A'Becket and High Street, Yates Estate and Victory, The Mission, Livesey, and Kentish Drovers and Bird in Bush Conservation Area Appraisals and Management Plans may impose additional planning requirements for those seeking to make alterations to their properties, which may have an impact on those on lower incomes such as lone parents, disabled people, the BAME community and the elderly.

DECISIONS REQUIRED:

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

OLD KENT ROAD AAP CONSERVATION AREAS EQUALITIES IMPACT ASSESSMENT

Stage One: Scoping

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

The proposed new Thomas A'Becket and High Street, Yates Estate and Victory, The Mission, Livesey, and Kentish Drovers and Bird in Bush Conservation Area Appraisals and Management Plans assesses the significance of each conservation and provides advice on proposed changes to existing buildings and new development within each area.

The proposed Thomas A'Becket and High Street, Yates Estate and Victory, The Mission, Livesey, and Kentish Drovers and Bird in Bush Conservation Area Appraisals and Management Plans will be assessed in accordance with statutory regulations and in close consultation with the local community and Historic England.

The conservation area appraisals are in general conformity with national and regional guidance and policy and contribute towards meeting local needs. The council's policies and strategies are evidenced to ensure that they are robust, meet local needs and can be justified.

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

This is a new policy. The proposed new Thomas A'Becket and High Street, Yates Estate and Victory, The Mission, Livesey, and Kentish Drovers and Bird in Bush Conservation Area Appraisal and Management Plan will form part of the council's Local Development Framework, which contains all of the council's planning policies and will be used to guide the design and appearance of development in the designated area and in the determination of planning applications.

- 3. If existing, has the policy/strategy already been reviewed under the previous EqIA programme? If so, what were the findings to come out of this and has the agreed action plan been implemented? What has changed since the last assessment was undertaken (in terms of context, nature of the policy/strategy or the type of people affected by the policy/ strategy).
 - No, this policy has not been previously reviewed under a previous EqIA.

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

- Age.
- Disability.
- Gender reassignment.

- Marriage and civil partnership
- Pregnancy and maternity.
- Race.
- Religion or belief.
- Sex.
- Sexual orientation.

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

Community and Stakeholder Involvement

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

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

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

Considerations:

- Certain groups may not be able to access information and consultations as easily as others i.e. disabled people, those who do not have English as their first language, young people, those who support vulnerable people such as women who are more likely to care for children, older people and those with limiting illnesses.
- Certain groups may not feel comfortable expressing their views in public due to fear of discrimination such as people from the LGBT community, faith groups, young people and the BAME community.
- People may not feel safe in attending public information or consultation events at certain times of the day, in particular after dark, such as older people and women
- Events may clash with times of religious observance and therefore we need to take into account people's faiths.
- Information may not be presented in a way that engages people effectively, such as material only printed in English, or information presented in a complicated format or language.

- Certain groups may not understand the relevance of the proposed Thomas A'Becket and High Street, Yates Estate and Victory, The Mission, Livesey, and Kentish Drovers and Bird in Bush Conservation Areas and the conservation area appraisals to them and therefore they do not become involved in the process.
- Certain groups may have a negative perception of the council or disappointing experiences of community consultations which stop them becoming involved in the process.
- If people do not feel that they can access information at an early stage or have problems accessing it, they may become disillusioned in the process and lose interest i.e. BAME groups, young and elderly people and disabled people.
- Some people may not be aware how to express their views or how these will feed into the process i.e. children and young people.
- There may be differences in the needs and aspirations between different groups which may result in conflict.
- People may feel as though certain groups are having a greater influence on how development of the Thomas A'Becket and High Street, Yates Estate and Victory, The Mission, Livesey, and Kentish Drovers and Bird in Bush Conservation Areas.

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

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

Design and Heritage

The adoption of the Thomas A'Becket and High Street, Yates Estate and Victory, The Mission, Livesey, and Kentish Drovers and Bird in Bush Conservation Area Appraisal and Management Plan may impose additional planning requirements for those seeking to make alterations to their properties. The wider area is expected to undergo significant change through the development. This will see increased investment and development activity, which provides significant opportunities to improve the built environment in the area.

We see the designation of the proposed new Thomas A'Becket and High Street, Yates Estate and Victory, The Mission, Livesey, and Kentish Drovers and Bird in Bush Conservation Areas as contributing to the enhancement of the Old Kent Road AAP area because we value its distinctive historic character. Consideration should be given to the following issues in the development and implementation of policies for design and heritage:

Considerations

The pattern of development

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

Improved quality of design

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

Improved public realm and environmental quality

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

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

Stage two: Assessment of Impacts

Part A: Feedback from the Equalities and Diversity panel

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

The adoption of the Thomas A'Becket and High Street, Yates Estate and Victory, The Mission, Livesey, and Kentish Drovers and Bird in Bush Conservation Area Appraisals and Management Plans have not been presented to the Equalities and Diversity panel as it was not considered to be a necessary requirement. There is no statutory obligation on the council to consult on the adoption of a new conservation area appraisal however as discussed earlier the appraisal will form part of the council's Local Development Framework. This document will be consulted on in line with the council's adopted SCI and will also be subject to it own equalities impact assessment.

Part B: Purpose and aims of policy/strategy

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

The Thomas A'Becket and High Street, Yates Estate and Victory, The Mission, Livesey, and Kentish Drovers and Bird in Bush Conservation Area appraisals and Management Plans will be part of Southwark's Local Development Framework. This will be an important document which will be used for deciding what sort of development should take place within the conservation area.

3. What are its aims?

The aim of the Thomas A'Becket and High Street, Yates Estate and Victory, The Mission, Livesey, and Kentish Drovers and Bird in Bush Conservation Area Appraisals and Management Plans is to assess the significance of the area, and advise on the appropriateness of further development in the area around Thomas A'Becket and High Street, Yates Estate and Victory, The Mission, Livesey, and Kentish Drovers and Bird in Bush as defined by the maps, being area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance.

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

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

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

The pattern of development

- The built environment and the public realm may continue to ignore the needs of disabled people which results in creating barriers to inclusion in the wider community and opportunities to decent housing, jobs and access to leisure and community facilities. The designation of a conservation area will not restrict improvements to buildings and the public realm to meet the needs of disabled people from the wider community.
- Existing larger houses within the proposed conservation area will be protected helping to ensure that families can stay within the area alongside its wider regeneration

Improved quality of design

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

Improved public realm and environmental quality

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

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

While the council's responsibility for eliminating discrimination and promoting equality of opportunity and social cohesion are not specifically referred to as part of the process for designating a new conservation area, the aim of this process is

to create attractive and distinctive places for all which are safe, easy to get around and a pleasure to be in by valuing the distinctive historic environment of the Borough.

Part C: Application of this policy/strategy

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

The Thomas A'Becket and High Street, Yates Estate and Victory, The Mission, Livesey, and Kentish Drovers and Bird in Bush Conservation Area Apprisals and Management Plans will mean that planning applications for developments within the conservation area, will need to 'preserve or enhance' the character and appearance of the conservation area and be in broad compliance with the document. New development will need to respect the context of the conservation area, having regard to the content of the conservation area appraisal, propose appropriate materials, preserve traditional features of the area and do not introduce design features or materials that are out of character with the area.

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

The adoption of the Thomas A'Becket and High Street, Yates Estate and Victory, The Mission, Livesey, and Kentish Drovers and Bird in Bush Conservation Area appraisals and management plans will contribute to eliminating discrimination, promoting equality of opportunity and promoting social cohesion and good community relations.

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

The findings of the EqIA scoping have been considered and this has informed the stage 2 assessment. The stage 2 assessment sets out those areas where the designation of the Thomas A'Becket and High Street, Yates Estate and Victory, The Mission, Livesey, and Kentish Drovers and Bird in Bush Conservation Areas may have differential impacts and where appropriate mitigation measures are proposed to address these.

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

Monitoring of planning applications

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

Annex 3: Related projects and EQIAs

The Southwark Plan

Key findings:

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

Core strategy

Key findings:

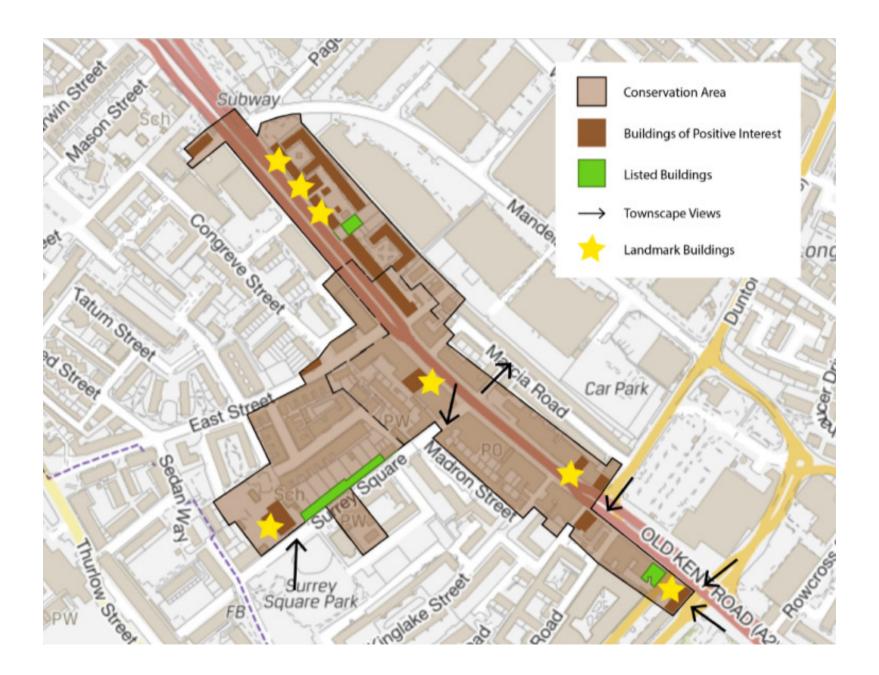
- By requiring the maximum amount of affordable housing possible across the whole
 of the borough, this should have a positive impact on all equality groups and help
 to promote equality of opportunity by offering affordable housing across the whole
 of Southwark.
- Allowing student housing only in the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

Southwark 2016

Key findings:

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

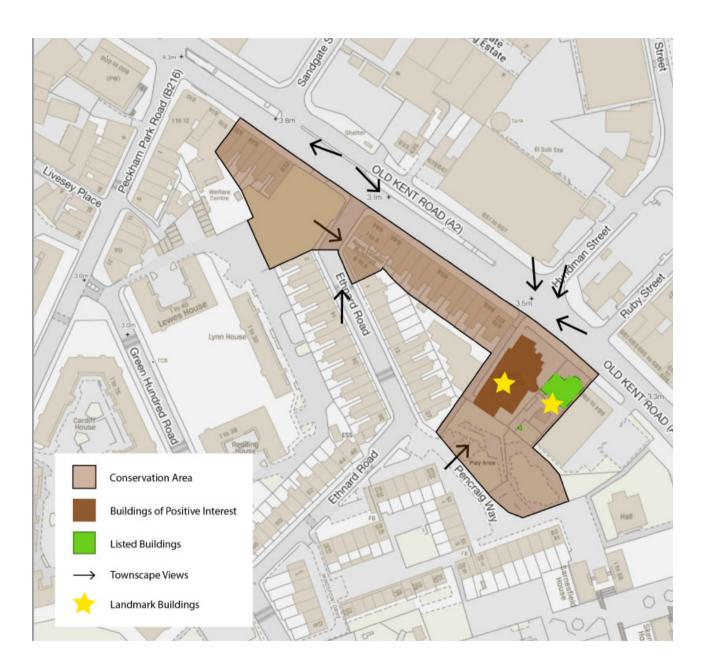
APPENDIX 2

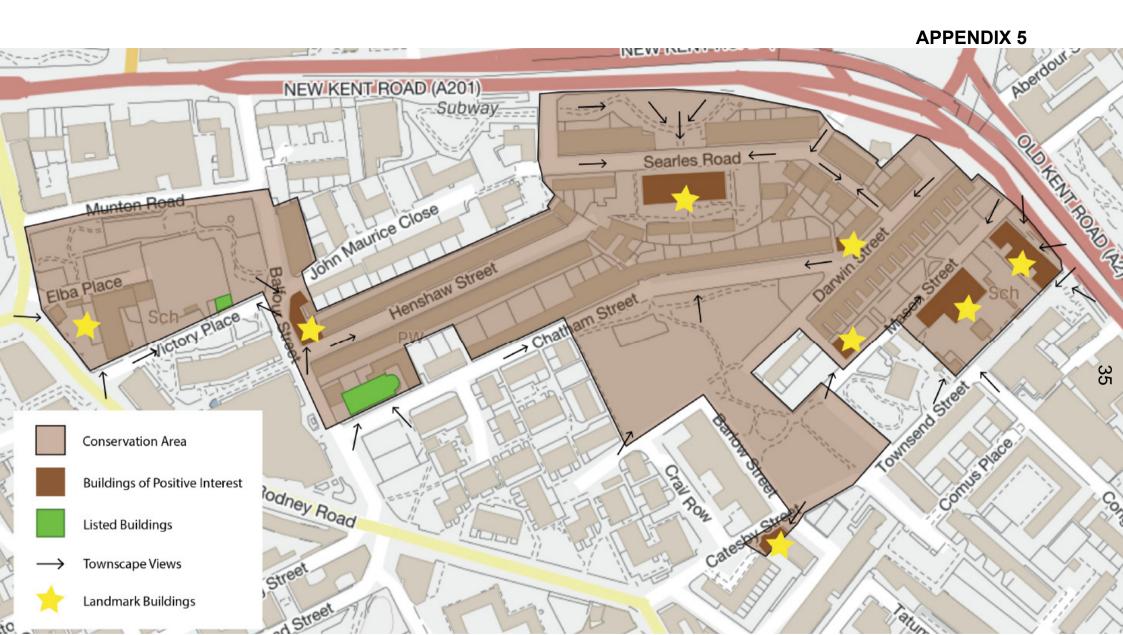


APPENDIX 3

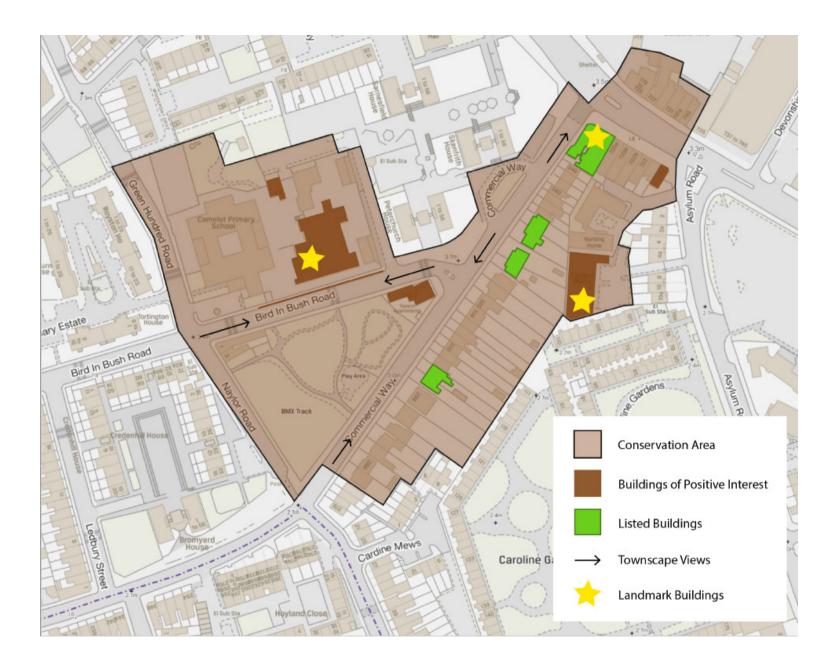


APPENDIX 4





APPENDIX 6



Item No. 7.	Classification: Open	Date: 6 January 2021	Meeting Name: Planning Committee
Report title	<u> </u> ::	Release of £140,019.40 of Section 106 n for the refurbishment of community spa 231 Old Kent Road	
Ward(s) or groups affected:		South Bermondsey, Old Kent Road, London Bridge and West Bermondsey	
From:		Director of Planning	

RECOMMENDATION

1. That Planning Committee approves the release of £140,019.40 of Section 106 funding from the legal agreements listed below to deliver the community space at 231 Old Kent Road.

Permission Ref	Account No	Address	Amount
12/AP/3255	656	6 Willow Walk, London SE1	£3,404
12/AP/0164	621	126 Spa Road, SE16 3QT	£7,385
11/AP/1180	567	434-452 Old Kent Road, SE1 5AG	£15,591.99
12/AP/2942	661	4-10 Lamb Walk and 7-9 Morocco Street, SE1 3TT	£4558.78
12/AP/1423	627	19 Spa Road, SE16 3SA	£6,503.91
13/AP/0065	723	387-399 Rotherhithe New Road and 1-11 Verney Road, SE16 3HG	£28,672
12/AP/2702	632	Marshall House, 6 Pages Walk, London, SE1 4SB	£13,019
14/AP/2102	734	Site Bounded by Grange Walk, Grange Yard and The Grange, London, SE1 3DT	£27,604
14/AP/1552		Former Southwark Car Pound, 25 Mandela Way, SE1 5SS	£33,280.72
TOTAL			£140,019.40

BACKGROUND INFORMATION

- 2. Planning obligations under Section 106 of the Town and Country Planning Act 1990 are used to address the negative impacts caused by a development and contribute to providing infrastructure and facilities necessary to achieve sustainable communities. The council can enter into a legal agreement with a developer whereby the developer agrees to provide planning obligations.
- 3. 231 Old Kent Road is a new consultation hub on the Old Kent Road. Its purpose is to help build awareness of the regeneration aspirations in the area and provide a location from which to build community engagement. It is a council owned building and the aspiration for the space is to:
 - Establish a regular presence through drop-in surgeries either with council officers or volunteers;
 - For local community to out information about what is happening in the Old Kent Road;
 - Hold exhibitions and displaying the model of the Old Kent Road;
 - Host events such as meetings, workshops, school visits etc.;
 - Act as an exhibition space for developers to hire for public consultations; and
 - The space would be simple, contemporary and cost efficient.
- 4. The council launched the space in April 2019 with the launch of the 'Museum of Us', a two-week programme complete with series of events celebrating the Old Kent Road's rich and diverse history and population, past and present.
- 5. While the ground floor of 231 will be used for consultation and engagement, the first and second floors would be opened in partnership with the Southwark Young Advisers. The idea is that the Young Advisors will manage the upper floors as a safe space for young people where they can do homework, access mentoring and other support programmes, get business advice etc. The programme was originally initiated by CLG and is now part of a charity and is not funded by Southwark https://youngadvisors.org.uk/ya-team. As well as being a good offer as part of the regeneration of the Old Kent Road, the proposal also works very well with the consultation hub and will ensure that the latter is able to be open and used at least 3-4 days a week.
- 6. It is proposed that this funding will contribute towards refurbishment of 231 Old Kent Road. This will include but not necessarily be limited to the shopfront and build fit-out on all floors.
- 7. The existing building comprises of 3-storeys with a shop unit at ground floor and 2 floors of office accommodation above. The proposals for the refurbishment are shown in the images below.

Figure 1: Proposed shop front



Figure 2: Proposed ground floor interior

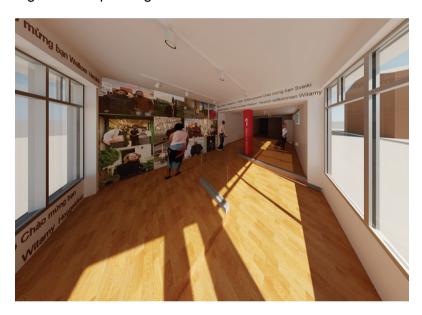


Figure 3: Proposed upper floor



Figure 4: Proposed elevation fronting on the Old Kent Road



8. The council has invited tenders for the work and the responses from contractors indicate that the works would have a value of approximately £130,000. The architectural design fees for the project are a further £10,000. It is envisaged that the works will be carried out over the summer, subject to confirmation of safe construction practices and the building would be re-opened in the autumn. The council is aiming to fund the works through S106 obligations. The S106 funding which this report seeks to release to contribute to the works are the following:

Permission Ref	Address	Purpose	Ward	Relationshi p to 231 Old Kent Road	Amount
12/AP/3255	6 Willow Walk, London SE1	Community development.	South Bermondsey	Same ward and within OKR Opportunity Area (OA)	£3,404

12/AP/0164	126 Spa Road, SE16 3QT	Community development.	South Bermondsey	Same ward	£7,385
11/AP/1180	434-452 Old Kent Road, SE1 5AG	Community development.	Old Kent Road	Within OKR OA	£15,591.99
13/AP/0065	387-399 Rotherhithe New Road and 1-11 Verney Road, SE16 3HG	Community development.	Old Kent Road	Within OKR OA	£28,672
12/AP/2942	4-10 Lamb Walk and 7-9 Morocco Street, SE1 3TT	Community development.	London Bridge and West Bermondsey	Part of ward is within OKR OA	£4,558.78
12/AP/1423	19 Spa Road, SE16 3SA	Community development.	London Bridge and West Bermondsey	Part of ward is within OKR OA	£6,503.91
12/AP/2702	Marshall House, 6 Pages Walk, London, SE1 4SB	Community development.	London Bridge and West Bermondsey	Within OKR OA	£13,019
14/AP/2102	Site Bounded by Grange Walk, Grange Yard and The Grange, London, SE1 3DT	Community development.	London Bridge and West Bermondsey	Part of ward is within OKR OA	£27,604
14/AP/1552	Former Southwark Car Pound, 25 Mandela Way, SE1 5SS	Community development.	South Bermondsey	Same ward and within OKR Opportunity Area (OA)	£33,280.72

KEY ISSUES FOR CONSIDERATION

9. This community space will positively support civic engagement around the Old Kent Road. Through the Museum of Us exhibition and other events and

workshops held in the space, it has already accommodated over 500 people since the initial launch in April 2019. Attendees to the Museum of Us exhibition came from a wide area, including all the wards in which the developments listed above are located (see Figure 5 below).

Place a yellow sticker where you work

Place a blue sticker where you like to visit

OUR MANY THE STANDARD STAN

Figure 5: Museum of Us attendees – relationship to 231 Old Kent Road

- 10. Local residents and community groups are already using the space for community workshops and other consultation events. It is currently a base for the local community group Action OKR, a part GLA/part crowdfunded group, who have used the space to hold meetings and exhibitions in the building, including running a number of events for the 2019 London Festival of Architecture. It has also been used for public and private exhibitions and workshops by local residents.
- 11. Following the proposed refurbishment, the building will be managed by the Southwark Young Advisors who will open the building 3-4 days a week, making the ground floor available for consultation and as a place to find out about the regeneration of the Old Kent Road. The council is also exploring the way in the ground floor might be

used to promote work around the climate emergency. The two upper floors will provide space in which to support young people in borough, offering a local base for people to access services, making them more accessible and desirable. It will provide early intervention services, helping people to solve problems before they escalate into bigger problems. The community hub will offer a safe place where people can come in for a coffee or training course, and access additional services needed such as debt advice, mental health services or counselling without stigma. It will also provide a more holistic approach to helping people with issues of concerns.

- 12. Safety is primarily important in the space. Therefore, CCTV would be installed on all floors. The Southwark Young Advisors are trained in risk assessing, first aid, personal safety and manual handling. The team covering 231 Old Kent Road are trained in safeguarding adults and vulnerable children as well as event management.
- 13. Once established, the aim will be to have an 'open door' policy where the organisations supporting the project can help people access a range of services under one roof. These include the Councils' employment and apprenticeship programme in association with organisations such as Southwark Works and Street League.
- 14. 231 Old Kent Road also has the potential to complement other community spaces in the area, including Walworth Living Room on Surrey Square. A new community space, Walworth Living Room has a community kitchen at its heart and aims to offer a range of services including clubs and activities, GP clinics, therapy sessions and debt advice. Together, 231 Old Kent Road, Walworth Living Room and other facilities such as Pembroke House, East Street Library and the Livesey Exchange could be a fantastic network of spaces and a great community resource.

Policy implications

15. The provision of a community space at 231 Old Kent Road is consistent with the Draft Old Kent Road Area Action Plan (AAP) 2020, and will reinforce the aims of AAP policy 13, 'Best Start in Life', which encourages development of accessible spaces for local communities in the area.

Community impact statement

- 16. The refurbishment of 231 Old Kent Road will have a positive impact in the community. The provision of modern and practical facilities with more capacity for youth engagement will greatly enhance the quality of life in the area.
- 17. The provision will provide space for all sections of the community irrespective of class, gender, ethnic origin, disability, religious belief, age or sexuality can come together. This in turn will improve the quality of life of people in Southwark and encourage community cohesion.

18. The council is seeking to maximise the potential to use local businesses and contractors in refurbishing 231 Old Kent Road. The architectural plans have been drawn up by an Old Kent Road based architect and tenders for the contract have been sought from businesses including Old Kent Road based contractors. The internal exhibition stands have been designed and manufactured on the Old Kent Road, the shop front for the Museum of Us was renovated by an Old Kent Road based contractor and the facia painted by a Peckham based sign writer.

Legal/Financial implications

- 19. This report requests that the proposed refurbishment works are funded from S106 contributions from nearby developments. All the wards in which the identified developments and S106 contributions are located are either entirely or in part within the Old Kent Road opportunity area. Moreover, visitors to 231 Old Kent Road have come from around the opportunity area and from all the wards listed (see Figure 5, above).
- 20. The identified contributions were secured through S106 legal agreements in which there was a justified requirement for provision of community facilities. In most of the agreements listed above, the financial contribution was made in accordable with the standard charges in the 2007 Planning Obligations SPD. In all the obligations identified, the refurbishment of a building to provide a community space at 231 Old Kent Road is a relevant and justifiable recipient for S106 funding.

Consultation

21. The establishment of 231 Old Kent Road as a consultation hub has been widely published through the Old Kent Road community forum meetings of 2018-2019, the website and more recently through the launch of the space at the 'Museum of Us' exhibition. Part of the rationale for the Museum of Us exhibition was to explore peoples views on the idea of establishing a permanent hub at the space. The Southwark Young Advisors and many other young people in the area have also been consulted on the design proposals for the refurbishment over a series of workshops.

Resource implications

22. The S106 funds identified in the report are currently unallocated and available for this programme. These would fund the entirety of the capital works. The revenue required to fund the Young Advisors management of the building will be generated by a combination of room and desk hire as well as private sponsorship from businesses and developers around the Old Kent Road.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Director of Law and Democracy

- 23. The report refers to works which are proposed at 231, Old Kent Road which is intended to operate as a community space and consultation hub providing a centre so that the significant changes expected to take place within the Old Kent Road Opportunity Area can be explained and discussed
- 24. The works concerned have been costed at £130,000 with further £10,000 for architectural design work. The release of section 106 monies outlined in this report is for an amount of £140,019.40
- 25. Paragraphs 8 and 19 of the report explains the relationship between the sites which are the subject of the individual section 106 Agreements and the property at 231 Old Kent Road. All the sites are either within the same or a nearby Ward to the property and most are within the Old Kent Road Opportunity Area. The individual agreements have been checked and it is confirmed that the contributions are being spent in accordance with both the terms of the specific section 106 Agreements and also the legal tests relating to the validity and expenditure of section 106 monies.
- 26. Paragraph 17 of the report confirms that the new consultation hub will be available for all sections of the community and it is therefore considered that this decision will in fact have a positive impact on individuals from a group having a protected characteristic as defined in the Equality Act 2010.

Strategic Director of Finance and Governance (CAP20/008)

- 27. This report requests the Planning Committee to approve the release of £140,019.40 section 106 funds from legal agreements listed at paragraph 1 of this report, towards the delivery of improvement works to the community space at 231 Old Kent Road.
- 28. It is noted that the section 106 funds associated with the agreements listed in this report have not been allocated to other projects, and they are available for the purposes outlined in the body of the report.
- 29. The strategic director of finance and governance notes the resource implications at paragraph 22, confirms that the council has received the related section 106 funds, and they are available for this project
- 30. The section 106 allocation of £140,019.40 represents an increase in council's capital expenditure and will be reflected as a budget variation in the next capital budget monitoring report to cabinet.
- 31. Staffing and any other costs associated with this recommendation are to be contained within existing departmental revenue budgets.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Copies of S106 agreements	Planning Division,160 Tooley Street	Alistair Huggett 020 7525 5464
Link:	ng and huilding control/plan	ning

https://www.southwark.gov.uk/planning-and-building-control/planning-applications/planning-register-search-for-view-and-comment-on-planning-applications

APPENDICES

No.	Title
None	

AUDIT TRAIL

Lead Officer	Tim Cutts, Senior	Tim Cutts, Senior Regeneration Manager				
Report Author	Liz Awoyemi,Plar	nning Projects Officer				
Version	Final					
Dated	15 December 202	20				
Key Decision?	No					
CONSULTATION	WITH OTHER OF	FICERS / DIRECTOR	ATES /			
CABINET MEMB	ER					
Officer Title Comments Sou			Comments Included			
Director of Law ar	nd Democracy	Yes	Yes			
Strategic Dire		Yes				
Finance and Governance						
Date final report	ional Team	15 December 2020				

Item No. 8.	Classification: Open	Date: 6 January 2021	Meeting Name: Planning Committee	
Report title:		Development Management		
Ward(s) or groups affected:		All		
From:		Proper Constitutional Officer		

RECOMMENDATIONS

- 1. That the determination of planning applications, or formal observations and comments, the instigation of enforcement action and the receipt of the reports included in the attached items be considered.
- 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

Lead Officer	Chidilim Agada, Head of Constitutional Services						
Report Author	Tim Murtagh, C	Tim Murtagh, Constitutional Officer					
	Jonathan Go	rst,	Head	of	Reg	eneration	and
	Development						
Version	Final						
Dated	17 December 2	020					
Key Decision?	No	No					
CONSULTAT	ION WITH OTH	ER C	FFICEF	RS/E	IRE	CTORATES	6/
	CABINET MEMBER						
Officer Title		Co	mments	sou	ght	Comment	s included
Director of Law a	Director of Law and Democracy Yes Yes				Yes		
Director of Planning No No				No			
Cabinet Member No No			No				
Date final report sent to Constitutional Team			17 Dece	mber 2020			

Agenda Item 8.1

Contents

RECOMMENDATION	4
EXECUTIVE SUMMARY	4
BACKGROUND INFORMATION	8
Site location and description	8
Details of Proposal	9
KEY ISSUES FOR CONSIDERATION	11
Summary of main issues	11
Legal Context	12
EQUALITIES	12
PRINCIPLE OF DEVELOPMENT IN TERMS OF LAND USE	13
Industrial Land	15
Assessment of Main Town Centre Uses	19
Provision of Housing, Including Affordable Housing	20
Prematurity	24
AFFORDABLE HOUSING AND DEVELOPMENT VIABILITY	25
Conventional Affordable Housing	25
Development Viability	26
DESIGN CONSIDERATIONS	27
Site Layout	27
Height Scale and Massing (including consideration of Tall Buildings)	28
Architectural Design and Materiality	31
Landscaping	33
Trees	34
HERITAGE AND TOWNSCAPE CONSIDERATIONS	34
Conservation Areas	35
Townscape and Visual Impact Assessment (TVIA)	35
HOUSING MIX, DENSITY AND RESIDENTIAL QUALITY	43
Housing Mix	43
Density	44
Quality of Residential Accommodation	47
Quality of Student Accommodation	48
OUTDOOR AMENITY SPACE, PLAY SPACE AND PUBLIC OPEN SPACE	50
Private Outdoor Amenity Space	51
Communal Amenity Space	51

Children's Play Space	52
Public Open Space	54
Sunlight Amenity Analysis within the Proposed Development	55
IMPACT OF PROPOSED DEVELOPMENT ON AMENITY OF ADJOINING O	
SURROUNDNG AREA	
Impact of the Proposed Uses	
Daylight and Sunlight Impacts	
Overlooking of Neighbouring Properties	
TRANSPORT CONSIDERATIONS	
ARCHAEOLOGY	
AVIATION	
TV AND RADIO SIGNALS	
ENVIRONMENTAL CONSIDERATIONS	
Wind and Microclimate	
Flood Risk and Water Resources	
Ground Conditions and Contamination	
Air Quality	72
Noise and Vibration	73
SUSTAINABLE DEVELOPMENT IMPLICATIONS	73
Energy	73
Overheating	74
BREEAM	75
PLANNING OBLIGATIONS (Section 106 Undertaking or Agreement)	75
Mayoral and Southwark Community Infrastructure Levy (CIL)	78
OTHER MATTERS	78
CONCLUSION ON PLANNING ISSUES	78
STATEMENT OF COMMUNITY INVOLVEMENT	80
SUMMARY OF CONSULTATION RESPONSES	80
Community impact statement / Equalities Assessment	86
Relevant planning history	87
Planning History of Adjoining Sites	88
Planning Policy	91
Planning Policy Designations	91
Adopted Policy	91
Emerging Planning Policy	95
ENVIRONMENTAL IMPACT ASSESSMENT	97

BACKGROUND INFORMATION	98
BACKGROUND DOCUMENTS	98
APPENDICES	98
AUDIT TRAIL	98

Item No. 8.1	Classification: Open	Date: 6 January 2020	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 20/AP/1329 for: FULL PLANNING APPLICATION		
	Address: 313-349 ILDERTON ROAD, LONDON SE15 1NW		
	Proposal: Demolition of existing buildings and construction of two buildings, one of part 11 and 13 storeys and one of part 13 and 15 storeys, to provide 1,526sq.m (GIA) of commercial floorspace, 250 student accommodation bed spaces (Sui Generis) and 58 residential units, with associated access and highway works, amenity space, cycle parking spaces, disabled car parking spaces and refuse/ recycling stores.		
	This application represents a departure from strategic policy 10 'Jobs and Businesses' of the Core Strategy (2011) and Saved Policy 1.2 'Strategic and Local Preferred Industrial Locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location.		
Ward(s) or groups affected:	Old Kent Road		
From:	DIRECTOR OF PLANNING		
Application 9	Application Start Date 12/05/2019 Application Expiry Date 11/08/2020		
Earliest Deci	Earliest Decision Date 28/07/2020		

RECOMMENDATION

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

EXECUTIVE SUMMARY

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

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

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

Comparison to approved 2017 Scheme – 17/AP/4819

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

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

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

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

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

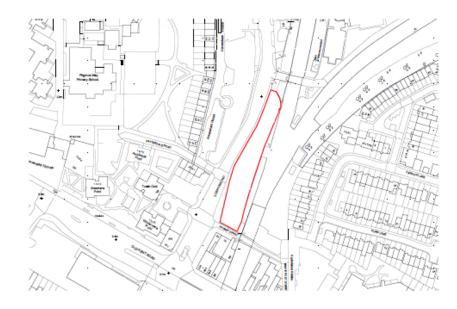
	units	
Affordable Student	N/A	87 of 250 bedspaces (35%)
Residential Amenity Space	1,092sqm private amenity space 562sqm communal amenity space	507sqm private amenity space 247.1sqm communal amenity space
Residential Play Space	125sqm	153sqm
Student Amenity Space	N/A	195sqm indoor communal amenity space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

BACKGROUND INFORMATION

Site location and description

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

Image: Site Location Plan



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

Details of Proposal

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

Table: Existing and Proposed Area Schedule

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

Total	2121sgm	1786sgm	-335sgm
lotai	Z 1Z 134111	17003q111	- 00034111

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

Table: Housing mix

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

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

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

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

Revisions and Amendments

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

KEY ISSUES FOR CONSIDERATION

Summary of main issues

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

Legal Context

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

EQUALITIES

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

Other Equality Impacts

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

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

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

Conclusion on Equality Impacts

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

PRINCIPLE OF DEVELOPMENT IN TERMS OF LAND USE

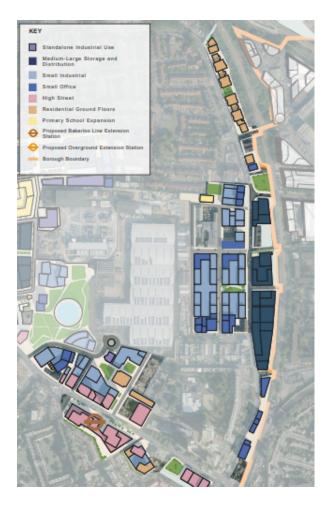
38. The NPPF (2019) offers a number of key principles that emphasise a focus on driving and supporting sustainable economic development to facilitate the delivery of new homes and commercial business units etc. The application site is located within the Old Kent Road Opportunity Area. In locations such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

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

Image: OKR Site Allocation OKR 16



Image: Typologies map of OKR 16



Industrial Land

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

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

Employment Re-provision (No Net Loss)

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

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

Image: Ground floor layout Core A

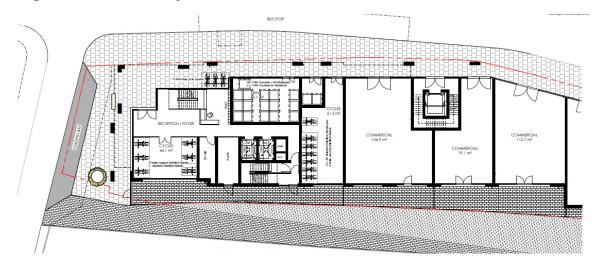


Image: Ground floor layout Core B

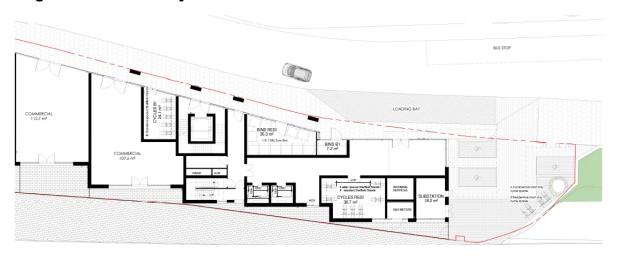


Image: Light Industrial floorspace viewed from Ilderton Road





Job Creation

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

Affordable Workspace

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

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

Relocation of existing businesses

The existing uses on site are as follows:

313-320 Ilderton Road

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

321-343 Ilderton Road

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

344-349 Ilderton Road

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

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

Assessment of Main Town Centre Uses

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

centre.

Provision of Housing, Including Affordable Housing

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

Delivery of Student Accommodation

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

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

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

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

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

Need for student housing

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

Management

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

Prematurity

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

Conclusion on Land Use

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

AFFORDABLE HOUSING AND DEVELOPMENT VIABILITY

Conventional Affordable Housing

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

- units. As with all Old Kent Road schemes, service charge costs to social rent tenants would be capped within social rent cap levels. This would be required in the Section 106 and confirmed when a registered social landlord is on board.
- 92. A contribution of £7,676.30 (a charge of £132.35 per affordable home) has been agreed towards affordable housing monitoring and maintained provision of these units, and would be secured by the legal agreement.

Affordable Student Accommodation

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

Development Viability

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

Conclusion on Affordable Housing and student housing

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

DESIGN CONSIDERATIONS

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

Site Layout

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

Image: Active frontages and public realm





Height Scale and Massing (including consideration of Tall Buildings)

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



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

Draft OKR AAP

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



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

*Site location identified by Blue arrow

London Plan (2016)

TIER 1 (Above 20 storeys) TIER 2 (Between 16 and 20 storeys) TIER 3 (Up to 15 storeys)

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

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

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

Southwark Plan

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

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

Architectural Design and Materiality

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

Image: Lower level appearance



Image: Upper level appearance



- 116. A brick language is proposed for the building in response to the character of the surrounding area. This would consist predominantly of dark brown and light cream/white brick elevations to create a separation between the elements of the massing, and interest with dark grey rainscreen cladding. Dark grey aluminium window frame, dark grey aluminium curtain walling to the light industrial units, and aluminium louvers matching the light industrial units curtain walling are proposed. The detailed design of all windows will be secured by condition, as will the fit of the light industrial units. The recessed and protruding balconies would be enclosed by glass balustrades.
- 117. These materials, along with the details described above are considered an appropriate response to the existing character of the area and the emerging architectural language proposed in the draft OKR AAP. Detailed drawings and

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

Landscaping

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

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

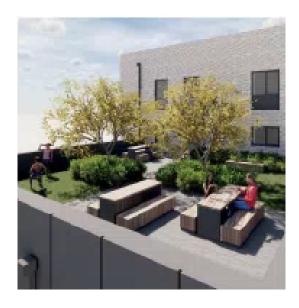


Image: Podium space



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

Trees

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

HERITAGE AND TOWNSCAPE CONSIDERATIONS

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

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

Conservation Areas

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

Draft OKR APP and Draft Local List

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

Townscape and Visual Impact Assessment (TVIA)

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

London View Management Framework (LVMF) Views

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

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

Borough Protected Views

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

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

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

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

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

Local Views and the setting of heritage assets

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

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

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





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

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

Image: New Cross Road - proposed view



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

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

Image: Brimmington Park - proposed view



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

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

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



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

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

Table: Impact on heritage significance

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

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

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

HOUSING MIX, DENSITY AND RESIDENTIAL QUALITY

Housing Mix

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

Table: Proposed Housing Mix

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

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

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

Table: Proposed housing mix broken down by tenure

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

Wheelchair Housing

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

Density

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

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

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

Table: Indicators of exemplary design

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

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

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

Quality of Residential Accommodation

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

Unit Size

- 147. Saved Policy 4.2 of the Southwark Plan advises that planning permission will be granted provided the proposal achieves good quality living conditions. The adopted standards in relation to internal layout are set out in the adopted Residential Design Standards SPD 2011 (including 2015 Technical Update).
- 148. All of the proposed units would satisfy the minimum floor areas set out in Southwark's Residential Design Standards SPD, alongside good floor to ceiling heights and glazing. All kitchen units would be naturally ventilated and lit. Bathrooms

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

Table: Proposed flat sizes

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

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

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

Quality of Student Accommodation

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

the occupiers, including staffing, servicing and management arrangements.

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

Table: Proposed housing mix broken down by tenure

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

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

Internal Daylight and Sunlight to Residential Units

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

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

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

Overlooking and Privacy within the Proposed Development

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

Conclusion on Quality of Accommodation

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

OUTDOOR AMENITY SPACE, PLAY SPACE AND PUBLIC OPEN SPACE

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

terraces);

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

Private Outdoor Amenity Space

- 165. The supporting text to Strategic Policy 7, Family Homes, of the Core Strategy (2011) states that family housing must provide a minimum of 10sqm of private amenity space to ensure that children have somewhere safe to play. It also states that new developments must provide additional communal play areas for children, as required by the Mayor's Supplementary Planning Guidance on Providing for Children and Young People's Play and Informal Recreation (there is further detail on play space requirements below).
- 166. The private outdoor amenity space requirements are clarified further in the 2015 Technical Update to the Residential Design Standards SPD, as follows:
 - Units containing three or more bedrooms should provide 10sqm of private amenity space; and
 - Units containing two bedrooms or fewer should ideally provide 10sqm of private amenity space. Where this is not possible, any shortfall should be added to the communal amenity space requirement; and
 - Private amenity spaces must be at least 3sgm in area.
- 167. The Residential Design SPD also states that a development is within an immediate proximity of a substantial area of public open space, accessibility to the open space, combined with better outlook, and may justify less amenity space as part of the development. In these circumstances a planning contribution may be required to provide improvements to off-site public amenity space.
- 168. In light of the above supplementary guidance, it is assumed that all units require 10 sqm of private amenity space; the total requirement would be 580 sqm (i.e. 58 units x 10 sqm). 15 of the units including all of the three bedroom units within the scheme either meet or exceed the 10sqm requirement. 34 units will provide between 7sqm and 10sqm, and 9 units provide between 5sqm and 7sqm. The total amount of private amenity space within the scheme is 507sqm which gives a shortfall of 73sqm from the requirement. This shortfall is to be provided in the communal amenity space in accordance with supplementary guidance.

Communal Amenity Space

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

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

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

Private and Communal Outdoor Amenity Space Calculations

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

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

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

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

Children's Play Space

- 173. The supporting text to Strategic Policy 7, Family Homes, of the Core Strategy (2012) states that new developments must provide communal play areas for children, as required by the Mayor's Supplementary Planning Guidance on Providing for Children and Young People's Play and Informal Recreation. Policy 3.6 of the London Plan requires new developments to make provision for play areas based on the expected child population of the development. Children's play areas should be provided at a rate of 10sqm per child bed space, covering a range of age groups. The updated GLA Child Play Space Calculator has been used in assessing this application.
- 174. The Mayor's SPG sets out the intended strategic approach to delivering new and enhanced play space both on and off-site in new developments. It explains that 'doorstep' play (Under 5s) should usually be provided on-site, unless there is existing provision within 100 metres. For 5-11 year olds and children over 12 years old, it recommends that off-site provision is acceptable, if there is existing provision within 100-400 metres and 400-800 metres respectively. This is summarised in Table 4.5 of

the SPG, reproduced below.

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

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

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

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

Children's Play Space Calculations

Table: Proposed areas of dedicated external play

Location	Area of dedicated play space
Podium level	153sqm

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

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

against policy requirements

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

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

Public Open Space

- 180. The Old Kent Road Area Action Plan identifies within its masterplans which sites will contribute land to new public open space and which will not. Policy AAP10 of the draft OKR AAP requires the provision of 5sqm of public open space per proposed home. Any shortfall will be charged at £205 per square metre. As set out in the Section 106 and CIL SPD, £205 per sqm represents the average cost for improving open space in Southwark. Sites that aren't providing land for public open space as required in the AAP will still therefore make contributions to public space provision in the wider plan area through this charging mechanism.
- 181. The development is maximised on the parcel of land therefore no public open space is provided within the scheme. However, it is noted that 150sqm of public realm is to

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

Public Open Space Calculation

Table: Public open space proposed

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

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

Overall contribution to Private, Communal, Play and Public Space

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

Sunlight Amenity Analysis within the Proposed Development

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

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

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

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

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

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

Impact of the Proposed Uses

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

Daylight and Sunlight Impacts

188. The following section of this report details the potential daylight, sunlight, and overshadowing impacts of the proposed development on surrounding residential properties. This analysis is based on guidance published by the Building Research Establishment (BRE). As required by Regulations, the submitted assessment has been undertaken by competent, experienced, registered professionals.

BRE Daylight Tests

189. Guidance relating to developments and their potential effects on daylight, sunlight,

and overshadowing is given within the 'Building Research Establishment (BRE) Report 209 Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice 2nd Edition (2011)' (BRE, 2011) and also in 'Lighting for Buildings Code of practice for daylighting (AMD 7391) BS 8206-2:1992' (BSI, 2008). The Building Research Establishment's (BRE) Site Layout Planning for Daylight and Sunlight, a guide to good practice (1) gives criteria and methods that are explained subsequently for calculating DSO effects on surrounding receptors as a result of the proposed development.

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

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

- 191. The BRE guidelines provide two principal measures of daylight for assessing the impact on properties neighbouring a site, namely Vertical Sky Component (VSC) and No-Sky Line (NSL).
- 192. The VSC test calculates the angle of vertical sky at the centre of each window and plots the change between the existing and proposed situation. The target figure for VSC recommended by the BRE is 27%, which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE also advises that VSC can be reduced by about 20% of its original value before the loss is noticeable. In other words, if the resultant VSC with the new development in place is less than 27% and/or less than 0.8 times its former value, then the reduction in light to the window is likely to be noticeable.
- 193. NSL is a measure of the distribution of daylight within a room. It maps out the region within a room where light can penetrate directly from the sky, and therefore accounts for the size of and number of windows by simple geometry. The BRE suggests that the area of the working plane within a room that can receive direct skylight should not be reduced to less than 0.8 times its former value (i.e. the proportional reduction in area should not be greater than 20%).

BRE Sunlight Tests

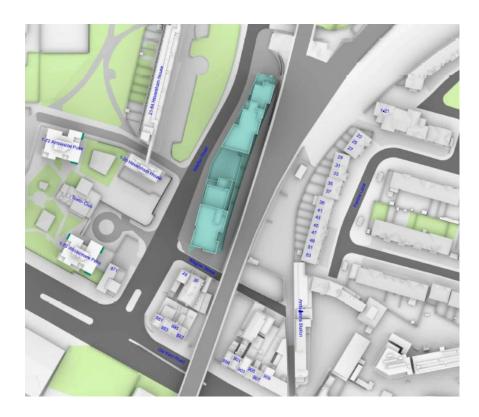
194. When assessing sunlight, the BRE recommends that the Annual Probable Sunlight Hours (APSH) received at a given window in the proposed case should be at least 25% of the total available, including at least 5% in winter. Where the proposed values fall short of these, and the absolute loss is greater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

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

Overshadowing

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

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



Daylight and sunlight impacts

7 – 21 Farrow Road

- 197. These properties are flats located to the east of the site across the railway line in the London Borough of Lewisham. Regarding daylight the majority of windows serving these properties comfortably achieve the BRE VSC criteria. Only four windows are not fully compliant with BRE guidance. These windows (W3/10, W3/11, W5/11 and W5/12) experience proportional reductions of 22.05%, 21.31%, 23.16% and 20.44% respectively. The retained VSC values are marginally less than 0.8 times the existing values, and therefore just below guidance. Both of the rooms are dual aspect in that the affected windows are also served by another window that will experience negligible reductions. The overall effect on the rooms will therefore be limited. Considering NSL, all rooms achieve BRE guidance, with the majority not experiencing any reduction. The daylight reductions to these flats will not be material, and they will continue to receive very good amenity after development.
- 198. The APSH results for sunlighting demonstrate that the impact on these properties is minimal, and fully complies with BRE Guidance. Sunlight amenity to the property will remain very good after the proposed scheme is implemented.

23 – 27 Farrow Road (Odd)

199. These properties are flats located to the east of the site across the railway line in the London Borough of Lewisham. It is assumed that the 2 ground floor windows to each of these properties both serve the same room, and that the 2 first floor windows serve two separate rooms. Furthermore, it appears likely that the smaller first floor windows serve bathrooms, and although figures were presented for these, if this is indeed the case then they would in fact not be material for assessment.

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

<u>29 – 53 Farrow Road (Odd)</u>

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

899 - 915 Old Kent Road (Odd)

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

881 - 887 Old Kent Road (Odd)

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

28 Wagner Street

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

871 Old Kent Road

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

1 to 73 Windermere Point

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

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

1 to 72 Grasmere Point

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

1 to 72 Ambleside Point

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

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

1 to 20 Heversham House

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

21 to 84 Heversham House

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

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

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

Daylight and sunlight impacts to emerging residential development

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

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

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

Overshadowing impacts

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

Daylight and sunlight conclusions

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

Overlooking of Neighbouring Properties

232. In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and

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

TRANSPORT CONSIDERATIONS

- 234. The site is on Ilderton Road and lies along the western boundary of the South London Railway Line, northern edge of Wagner Street and approximately 75m north of the junction of Ilderton Road and Old Kent Road (A2). The site being located on the border between both LB Southwark and LB Lewisham, therefore subject to the adopted public highway for both boroughs.
- 235. PTAL rating for the site = 4. The site is less than 50m walk from the South Bermondsey station and will be in walking distance of the New Bermondsey Station in Lewisham due to be operational by 2026). The site is not within a Controlled Parking Zone (CPZ)
- 236. Saved Policy 5.2 of the Southwark Plan seeks to ensure that developments do not result in adverse highway conditions; Saved Policy 5.3 requires the needs of pedestrians and cyclists to be considered and 5.6 establishes maximum parking standards.
- 237. Southwark have recently adopted the Movement Plan, a people, place and experience approach to transport planning rather than modal one. This application has been assessed on how it will contribute to the 9 Missions.
- 238. The Mayors Transport Strategy (MTS) Mayors Transport Strategy (MTS) includes three strategic challenges that are of significant importance to assessing this application:
 - Vision Zero
 - Healthy Streets
 - Air Quality
- 239. The submitted Transport Assessment (TA) is considered to provide an adequate appraisal of the relevant transport and highway related matters including an assessment of the potential for journeys to be made by sustainable modes of transport as well as detailed estimates of vehicular trips resulting from the development.

- 240. Officers have reviewed this application and identified the following areas for detailed comments:
 - Access and Road Safety The safe movement of all modes entering and exiting the public highway
 - Trip Generation –The existing and proposed trips related to the site
 - Servicing and Delivery How the development will manage the vehicular trips required
 - Car Parking How the development will manage the vehicular trips required
 - Public Transport Current access and future potential
 - Active Transport Walking and cycling and behaviour change

Existing Site Layout

- 241. The subject site is located along the eastern side of Ilderton Road and is bound to the north by a car washing business, to the east by the railway line and to the south by Wagner Street. The site is vacant but was previously occupied by RS Joyner & Son who used the open yard space to store second hand lorries and vans. There is also a bus stop located directly in front of the site that serves Bus Route P12.
- 242. The kerbside is currently not controlled and utilised by various businesses to park vehicles which are often uninsured. This does not contribute to a pedestrian friendly environment. Wagner Street borders the site's southern boundary and runs between Ilderton Road to White Post Street in Lewisham. Wagner Street is often blocked by loading / unloading and holding goods vehicles. Along Hornsey Street to the north, there are double yellow lines at the priority junction with Ilderton Road and then unrestricted on street car parking. The rear of the site is bounded by the railway line.

Proposed Site Layout

- 243. The proposed future site layout will improve the pedestrian movement by wider footways. The proposed access arrangements and loading bays will be detailed up as part of the S278 agreement. The proposed new loading bay will be sited to ensure the P12 bus route will not be impeded.
- 244. There was a significant delay in the signing of the previous developments S106 related to an unusual request from TfL which Southwark as highway authority had issues. The request was for additional clauses to be added to the S106 because although Southwark is the highway authority the TfL red route traffic authority extends to the junction of Wagner Street. Southwark felt that that was unnecessary because they already have a legal obligation to consult Transport for London on any proposals that impact on both their role as traffic authority and on the bus network. Southwark Highways would normally include any requirements for impacts on this within the S278 consultations. In that instance we agreed to ensure the S278 bond made a provision for £30,000 for any TfL directly related works. This arrangement will now apply to this application.
- 245. All works within the extent of the S278 for Southwark will be done in accordance with Southwark Street Design Manual SSDM and TfL's Healthy Streets design guidance.

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

Trip Generation

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

Servicing and Delivery

- 248. The proposal includes provision of off street servicing from Ilderton Road. The council will also consider additional loading bays on Ilderton Road and Wagner Street the exact location of which will be agreed within the S278 agreement. The refuse collection will happen from Ilderton Road and the bin stores are located within 10ms of the kerb. This will be a maximum of 2 trips per week (recycling and general waste) and have no significant impact on the bus or other traffic in the area.
- 249. In order to ensure that on-street servicing and deliveries do not negatively impact on the highway network, the Council is recommending that applicants in the Old Kent Road Opportunity Area enter into Delivery Service Plan Bonds against their baseline figures for all daily servicing and delivery trips. These bonds would be calculated at £100 per residential unit and £100 per 500 sqm of non-residential floor-space. In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, this is not intended as a financial penalty, but as a means of mitigating any harmful impacts from the proposed development and ensuring a better quality of life for current and future residents. As such, it is considered to meet the CIL Regulations 122 test, in that it would be:
 - (i) necessary to make the development acceptable in planning terms;
 - (ii) directly related to the development; and
 - (iii) fairly and reasonably related in scale and kind to the development.

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

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

- 251. As this application includes student accommodation we expect the delivery and service plan accompanying the bond to reflect the arrangements for student arrival and departures to demonstrate minimal impact on the highway and for residents and businesses in the area.
- 252. All uses in the development will be subject to a condition on the marketing and promotional material related to the work to ensure this is explicit in how the development has been designed to discourage private cars and encourage sustainable living, working and visiting.

Car Parking

- 253. The site is not located in a designated CPZ and there are sections of unrestricted onstreet parking available in the immediate vicinity of the site. The on street parking survey carried out for the previously approved application is deemed valid as it was carried out within 3 years of the submission and currently due to COVID 19 surveys would not reflect regular activity. Wagner Street and the surrounding area has approximately 65 unrestricted parking spaces available and 13 spaces available on single yellow lines. The existing site was used to park freight vehicles which will not return.
- 254. The proposed development will be car-free however be three off-street parking spaces for Blue Badge holders as well as a loading bay will be located to the north of the site this will be accessed via a new footway crossover from Ilderton Road. Swept path analysis has been provided to demonstrate a 10m manoeuvring to enable exiting onto the public highway in forward gear.
- 255. An S106 Obligation that prevents future residents or occupiers of the proposed development from obtaining resident parking permits will be applied to this application. A further obligation to ensure all marketing of the development promotes car free living, to ensure the occupants are well aware they will not be entitled to

permits.

Public Transport

- 256. The site has convenient access to the P12 bus route a single decker linking Canada Water to Peckham via the Old Kent Road, which calls at the stops on both Ilderton Road and Old Kent Road which are understood to provide capacity for approximately 60 passengers (including standing capacity) during morning and evening peak (information from the TA acquired summer 2018).
- 257. As a borough Southwark agrees with TfL that bus services will need to be increased in the area ahead of the BLE to accommodate the demand generated by additional homes and jobs generally in the Old Kent Road area in advance of the opening of the planned BLE which, subject to the granting of powers and availability of funding, would be 2029/2030 at the earliest. The requirement for TfL to provide evidence to prove both previous contributions has been spent appropriately and the evidence for the further draw is the fairest way this could be managed. A contribution for this site has been agreed as £2,700 per residential unit and the residential equivalent of student accommodation (250/2.5 = 100) and will be secured through the S106 Agreement.
- 258. Within the next ten years the area is likely to benefit from the Bakerloo Line Extension, this site will be in walking distance of both proposed new stations. On 4th December 2020 TfL received confirmation from the Department for Transport that they will safeguard the land along the A2 required to deliver the BLE.

Active Transport

Walking and public realm

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

Cycling

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

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

Construction

263. A Draft Construction Traffic Management Plan has been prepared as a standalone document to be submitted along with this application. The S106 Agreement will secure a detailed Construction Management Plan (CMP) and a £40 per unit contribution for Construction Management within the OKR AAP area. This is for the Council to manage cumulative impacts on the highways and environment.

Conclusion on Transport

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

ARCHAEOLOGY

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

AVIATION

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

the proposal.

TV AND RADIO SIGNALS

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

ENVIRONMENTAL CONSIDERATIONS

Wind and Microclimate

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

Flood Risk and Water Resources

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

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

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

Ground Conditions and Contamination

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

Air Quality

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

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

Noise and Vibration

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

SUSTAINABLE DEVELOPMENT IMPLICATIONS

Energy

- 283. Policy 5.2 of the London Plan requires major developments to provide an assessment of their energy demands and to demonstrate that they have taken steps to apply the Mayor's energy hierarchy. This involves the 'Be Lean', 'Be Clean', 'Be Green' hierarchy. Policies 5.5 and 5.6 require consideration of decentralised energy networks and policy 5.7 requires the use of on-site renewable technologies, where feasible. The residential aspect of the proposal would be expected to achieve zero carbon, and the commercial aspect a 35% reduction against part L of the Building Regulations 2010.
- 284. An Energy Statement and Strategy has been submitted based on the guidance of the National Planning Policy Framework (2019), The London Plan (2016) and Draft London Plan (2017), Southwark Core Strategy (2011), Southwark Sustainable Design and Construction Supplementary Planning Document (2015), and the Mayor's Energy Assessment Guidance.

Be Lean (use less energy)

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

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

Be Clean (supply energy efficiently)

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

Be Green (Low or Carbon Zero Energy)

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

Overheating

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

- DSY3, London Heathrow, high emission, 50% percentile weather files were used to assess current overheating potential.
- 292. The results demonstrate that nearly all assessed units within the development pass the overheating assessment for the current DSY1 scenario, which is the weather file recommended. The results also show that the development consistently performs well against Criteria 1, which looks at extremely high internal temperatures. However, in more extreme heat, such as the DSY2 and DSY3 scenarios, the building struggles to meet the requirements of Criteria 2. A range of measures have been incorporated to reduce this as much as is feasible. Guidance will be provided to the occupants on measures that they can take to improve comfort, including when to keep windows closed to reduce ingress of hot air, use of boost function of MVHR units, use of blinds to control solar gain and reducing gains from people and equipment.

BREEAM

293. Strategic policy 13 of the Core Strategy requires the commercial units to achieve BREEAM 'excellent'. A BREEAM Pre-assessment report has been undertaken which demonstrates that a "Very Good" standard can be achieved. This does not meet the "Excellent" standard that is required for the commercial element. A pre-fit condition for the commercial workspace to secure an 'Excellent' standard is therefore recommended. A proposed light industrial fit out condition will assist this improvement.

PLANNING OBLIGATIONS (Section 106 Undertaking or Agreement)

- 294. Saved Policy 2.5 of the Southwark Plan and Policy 8.2 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. Saved Policy 2.5 of the Southwark Plan is reinforced by the recently adopted Section 106 Planning Obligations 2015 SPD, which sets out in detail the type of development that qualifies for planning obligations. Strategic Policy 14 'Implementation and delivery' of the Core Strategy states that planning obligations will be sought to reduce or mitigate the impact of developments. The NPPF which echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:
 - Necessary to make the development acceptable in planning terms;
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development
- 295. The application would be supported by the following Section 106 obligations:

Table: Section 106 Financial Obligations

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

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

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

- Triggers securing Practical Completion of workspace;
- 10% Affordable workspace Available for 15 years minimum at £12 per sqft to the end user (subject to annual RPI increases);
- Affordable Workspace Management Plan, including marketing requirements;
- Construction phase jobs, short courses and apprenticeships or Employment and Training Contribution;
- Employment, Skills and Business Support Plan (Construction Phase);
- Retention of existing occupiers business plan
- Loss of employment floorspace
- Highways works s278 works;
- Connection to a future district heating system (SELCHP);
- London Living Wage best endeavours to being offered to all staff employed in the commercial units as well as workers during the construction period;
- Final Demolition and Construction Environment Management Plans;
- Final Delivery and Service Management Plan;
- Final Construction Logistics Management Plan;
- Local Procurement;
- Service charge costs to social rent tenants would be capped within social rent cap levels;
- Dockless cycle hire for 3 years or Brompton Lockers (10% of units)
- Car club membership for 3 years
- Parking permits exclusion zone for future occupiers
- Disabled parking restrictions
- Securing Alan Camp Architects to deliver the building detailed design, unless otherwise agreed in writing
- 297. The S106 heads of terms agreed would satisfactorily mitigate against the adverse impacts of the proposed development.
- 298. In the event that a satisfactory legal agreement has not been entered into by 6th August 2021, it is recommended that the Director of Planning refuses planning permission, if appropriate, for the following reason:

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

S278 Works Outline

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

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

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

Mayoral and Southwark Community Infrastructure Levy (CIL)

- 301. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material "local financial consideration" in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport investments in London as a whole, primarily Crossrail, while Southwark's CIL will provide for infrastructure that supports growth in Southwark.
- 302. Based on the existing floor areas provided in the agent's CIL Form dated 01-May-20 and proposed areas in the Area Schedules (15-May-20), the gross amount of CIL is approximately £3,094,353.34, consisting £830,276.28 of Mayoral CIL and £2,264,077.06 of Borough CIL. If CIL relief procedures have been followed correctly after grant of planning permission, it is expected over £1,638,112.20 of Social Housing Relief might be claimed, of which £308,276.20 of MCIL2 relief and £1,329,836.00 of Borough CIL relief.
- 303. That is, the anticipated CIL receipt for this scheme is circa £1,456,241.14 net of relief. It should be noted that this is an estimate, and the floor areas will be checked when related CIL Assumption of Liability Form is submitted after planning approval has been obtained.

OTHER MATTERS

304. None

CONCLUSION ON PLANNING ISSUES

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

- along with the introduction of Light Industrial Affordable Workspace is considered to be a major benefit of the scheme with the provision of 10% of the employment floorspace for Affordable Workspace is welcomed.
- 307. The proposed mix of uses would retain the existing industrial character of the eastern side of Ilderton Road whilst successfully introducing residential and student accommodation dorms uses into the area which would be complemented by 250sqm of public realm fronting Wagner Street. In addition, the design of the light industrial space creates multiple frontages that enable the street level of Ilderton Road and Wagner Street to be activated.
- 308. The scheme would deliver the following major regeneration benefits:
 - 58 new residential units to the borough's housing stock;
 - 100% conventional affordable housing overall (71% social rented and 29% intermediate by unit and 66% and 34% by habitable rooms)
 - 250 student accommodation bed spaces at 35% affordable
 - The reprovision of the existing light industrial floorspace with the introduction of Affordable Workspace;
 - Significant uplift in full time equivalent jobs would be provided post development;
 - Generous provisions of door-step play for younger children and adequate space for older children play along with adequate communal amenity for residents to use and enjoy.
 - A contribution to new and existing parks within Old Kent Road Opportunity Area, with delivery mechanisms secured through the Section 106;
 - The site will benefit significantly from the planting of trees and landscaping features that are currently not available on site;
 - The proposed development results in a series of significant economic, social and environmental benefits that outweighs any potential and minor harm to the surrounding area that may be caused
- 309. The proposals would deliver a high standard of accommodation across both residential and student accommodation units, which would comply with the majority of the standards and principles of exemplary residential design, as set out in Southwark's residential design standards SPD, and emerging London Plan Policies. No units would be single aspect and north facing, nor would any single aspect units front onto the railway line to the east of the site. Additionally, the three bed units as part of the social rent provision are dual aspect. Given the high density of the scheme this is considered to provide a high level quality of accommodation. Furthermore, all units have access to private amenity as well as communal amenity and play space located on the tenth and eleventh floors of the development.
- 310. The proposed development would reduce car dependency whilst significantly increasing cycle provision within the development. The enhancement of the footway on both Ilderton Road and Wagner Street with general improvements to the immediate public realm would make the visual amenity and pedestrian experience improved through comfort and circulation and ease when entering, visiting or passing along the site.

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

STATEMENT OF COMMUNITY INVOLVEMENT

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

Consultations

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

Consultation Replies

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

SUMMARY OF CONSULTATION RESPONSES

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

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

GLA

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

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

<u>TfL</u>

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

London Underground

341. No comments to make on the application.

Metropolitan Police

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

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

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

Natural England

344. No comments to make on the application.

Environment Agency

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

Historic England (HE)

346. Historic England raises no objection to the scheme

Arqiva

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

Thames Water

- 348. Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.
- 349. A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths, private swimming pools and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, commercial swimming pools, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc may be required before the Company can **Applications** give consent. made https://wholesale.thameswater.co.uk/Wholesale-services/Business-customers/Tradeeffluent or alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.
- 350. Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development

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

- 351. The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains. Thames Water request that the following condition be added to any planning permission. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other https://developers.thameswater.co.uk/Developing-a-large-site/Planningstructures. your-development/Working-near-or-diverting-our-pipes Should you require further information please contact **Thames** Water. Email: developer.services@thameswater.co.uk.
- 352. The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local

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

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

Internal Consultees

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

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

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

Community impact statement / Equalities Assessment

- 355. The Public Sector Equality Duty (PSED) contained in Section 149 (1) of the Equality Act 2010 imposes a duty on public authorities to have, in the exercise of their functions, due regard to three "needs" which are central to the aims of the Act:
 - a) The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
 - b) The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:
 - Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
 - Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it
 - Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low
 - c) The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to tackle prejudice and promote understanding.
- 356. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.
- 357. The Council must not act in a way which is incompatible with rights contained within

the European Convention of Human Rights

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

Relevant planning history

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

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

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

16/AP/0831 Application type: Full Planning Application (FUL)

Minor amendment to planning permission 12-AP-1936 for: 'Construction of a new two storey building to accommodate replacement builders merchant shop (Use Class A1), office (Use Class B1) and storage (Use Class B8)' to allow for additional storage above drive through and elevational alterations including the addition of a new roller shutter

Decision date 28/04/2016 Decision: Granted (GRA)

17/EQ/0114 Application type: Pre-Application Enquiry (ENQ)

Redevelopment of site to provide student accommodation (sui generis as 118 clusters and 230 studios), flexible workspace (405sqm) and cafe (103sqm) at ground floor in a building of 5-19 storeys, and ancillary accommodation comprising bin store, bikes store, student amenity space.

Decision date 12/04/2017 Decision: Pre-application enquiry closed (EQC)

17/EQ/0096 Application type: Pre-Application Enquiry (ENQ)

Construction of 1 x 10 storey and 1 x 20 storey mixed use buildings consisting of commercial and residential flats (122 units)

Decision date 10/05/2017 Decision: Pre-application enquiry closed (EQC)

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

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

Decision date 04/12/2018 Decision: Planning permission granted subject to legal agreement.

Pre Application Advice

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

Planning History of Adjoining Sites

- 362. The Council has received a number of planning applications recently in the Old Kent Road Opportunity Area. These include the following:
- 363. 18/AP/0564 16 Peckham Park Road and 1 Livesey Place

Application type: FULL

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

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

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

Application type: FULL and OUTLINE

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

Detailed Component (Phase 1):

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

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

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

basement car parking spaces and cycle spaces.

Outline Component (Phase 2 and 3):

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

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

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

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

Application type: FULL

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

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

Application type: FULL

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

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

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

Application Type: FULL

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

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

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

Application type: FULL

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

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

369. 18/AP/3551 Southernwood Retail Park

Application type: FULL and OUTLINE

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

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

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

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

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

370. 19/AP/1322 - 840 Old Kent Road

Application type: FULL

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

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

Planning Policy

371. The statutory development plans for the Borough comprise the National Planning Policy Framework 2019, London Plan 2016, Southwark Core Strategy 2011, and saved policies from The Southwark Plan (2007 - July). The site falls within the area covered by the draft Old Kent Road Area Action Plan (draft OKR AAP).

Planning Policy Designations

- 372. The application site is found within the following Planning Policy Designations:
 - The Old Kent Road Opportunity Area;
 - Draft OKR AAP site OKR 16:
 - Preferred Industrial Location Strategic
 - The Urban Density Zone;
 - Bermondsey Lake Archaeological Priority Zone;
 - The Air Quality Management Area;
 - Public Transport Accessibility Level (PTAL) of 4;
 - Extended background area (Wider Setting Consultation Area) of LVMF views 2A.1, 3A.1, and 6A.1 and
 - Flood Zone 3
- 373. This application was determined in accordance with the development plan unless material considerations indicate otherwise; and the following national framework, regional and local policy and guidance are particularly relevant.

Adopted Policy

National Planning Policy Framework

- 374. The revised National Planning Policy Framework ('NPPF') was published in February 2019 which sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental.
- 375. Paragraph 212 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.
- 376. Section 2 Achieving sustainable development
 - Section 5 Delivering a sufficient supply of homes
 - Section 6 Building a strong, competitive economy
 - Section 7 Ensuring the vitality of town centres
 - Section 8 Promoting healthy and safe communities
 - Section 9 Promoting sustainable transport
 - Section 11 Making effective use of land
 - Section 12 Achieving well-designed places
 - Section 14 Meeting the challenge of climate change, flooding and coastal change
 - Section 15 Conserving and enhancing the natural environment
 - Section 16 Conserving and enhancing the historic environment
- 377. National Planning Policy Guidance (2014) is a web-based resource which brings together planning guidance on various topics into one place.

London Plan 2016

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

Policy 5.12 - Flood risk management

Policy 5.13 - Sustainable drainage

Policy 5.21 - Contaminated land

Policy 6.9 - Cycling

Policy 6.10 - Walking

Policy 6.13 - Parking

Policy 7.2 - An inclusive environment

Policy 7.3 - Designing out crime

Policy 7.4 - Local character

Policy 7.6 - Architecture

Policy 7.21 - Trees and woodlands

Policy 8.2 - Planning obligations

Policy 8.3 - Community infrastructure levy

- 380. The London Plan 2016 identifies the Old Kent Road as an Opportunity Area with "significant potential for residential led development along the Old Kent Road corridor". Opportunity Areas are described in the London Plan (2016) as London's major reservoirs of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility.
- 381. Policy 2.13 in the London Plan 2016 sets out the strategic policy for the development and intensification of opportunity areas. Annex 1 includes an indicative capacity for Old Kent Road of 2,500 homes and 1,000 jobs and supports the development of a planning framework to realise the area's full growth potential. It goes on to state that the employment and minimum homes figures should be explored further and refined in a planning framework for the area.

Mayoral SPGs

- 382. The following Mayoral SPGs are relevant to the consideration of this application:
- 383. Homes for Londoners (2017)

London View Management Framework (2012)

London's World Heritage Sites SPG (2012)

Providing for Children and Young People's Play and Informal Recreation (2008)

Use of planning obligations in the funding of Crossrail (2010)

Affordable Housing and Viability SPG (2017)

Core Strategy 2011

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

Strategic policy 1 - Sustainable development

Strategic policy 2 - Sustainable transport

Strategic policy 3 - Shopping, leisure and entertainment

Strategic policy 4 - Places for learning, enjoyment and healthy lifestyles

Strategic policy 5 - Providing new homes

Strategic policy 6 - Homes for people on different incomes

Strategic policy 7 - Family homes

Strategic policy 10 - Jobs and businesses

Strategic policy 11 - Open spaces and wildlife

Strategic policy 12 - Design and conservation

Strategic policy 13 - High environmental standards

Strategic policy 14 - Implementation and delivery

Southwark Plan 2007 (July) - Saved Policies

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

Policy 1.1 - Access to employment opportunities

Policy 1.2 - Strategic and local preferred industrial locations

Policy 1.5 - Small businesses

Policy 2.2 - Provision of new community facilities

Policy 2.5 - Planning obligations

Policy 3.2 - Protection of amenity

Policy 3.3 - Sustainability assessment

Policy 3.4 - Energy efficiency

Policy 3.6 - Air quality

Policy 3.7 - Waste reduction

Policy 3.9 - Water

Policy 3.11 - Efficient use of land

Policy 3.12 - Quality in design

Policy 3.13 - Urban design

Policy 3.14 - Designing out crime

Policy 3.15 - Conservation of the Historic Environment

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

Policy 3.19 – Archaeology

Policy 3.20 – Tall Buildings

Policy 3.22 – Important Local Views

Policy 3.28 - Biodiversity

Policy 4.2 - Quality of residential accommodation

Policy 4.3 - Mix of dwellings

Policy 4.4 - Affordable housing

Policy 4.5 - Wheelchair affordable housing

Policy 5.2 - Transport impacts

Policy 5.3 - Walking and cycling

Policy 5.6 - Car parking

Policy 5.7 - Parking standards for disabled people and the mobility impaired

Supplementary Planning Documents (SPDs)

386. The following Southwark SPDs are relevant to the consideration of this application:

Development Viability SPD (2016)

Technical Update to the Residential Design Standards SPD (2015)

Section 106 Planning Obligations/CIL SPD (2015)

Affordable housing SPD (2008 - Adopted and 2011 - Draft)

Residential Design Standards SPD (2011)

Sustainable Transport SPD (2010)

Sustainable design and construction SPD (2009)

Sustainability assessments SPD (2009)

Emerging Planning Policy

Draft New London Plan

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

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

The draft New London Plan is at an advanced stage. Policies contained in the Intend to Publish (ItP) London Plan published in December 2019 that are not subject to a direction by the Secretary of State carry significant weight. Paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.

388. The draft New London Plan identifies the Old Kent Road as having a minimum capacity for 12,000 homes and a jobs target of 5,000, which increases the capacity of the adopted London Plan of 2,500 homes and 1,000 jobs.

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

Policy SD1 – Opportunity Areas

Policy D1 – London's form, character and capacity for growth

Policy D2 – Infrastructure requirements for sustainable densities

Policy D3 – Optimizing site capacity through design-led approach

Policy D4 – Delivering good design

Policy D5 – Inclusive design

Policy D8 – Public Realm

Policy D9 – Tall Buildings

Policy D11 – Safety, security and resilience to emergency

Policy D12 – Fire Safety

Policy D14 – Noise

Policy H1 - Increasing housing supply

Policy H4 – Delivering affordable housing

Policy H5 – Threshold approach to applications

Policy H6 – Affordable housing tenure

Policy H7 – Monitoring affordable housing

Policy H10 – Housing size mix

Policy H15 – Purpose-built student accommodation

Policy E2 – Providing suitable business space

Policy E3 – Affordable workspace

Policy E5 – Strategic Industrial Locations (SIL)

Policy E7 – Industrial intensification, co-location and substitution

Policy G5 – Urban Greening

Policy G6 – Biodiversity and access to nature

Policy SI 1 – Improving Air Quality

Policy SI 2 – Minimising greenhouse gas emissions

Policy SI 3 – Energy infrastructure

Policy SI 4 – Managing heat risk

Policy SI 5 – Water infrastructure

Policy SI 7 – Reducing waste and supporting the circular economy

Policy SI 9 – Waste capacity and net waste self-sufficiency

Policy SI 12 – Flood risk management

Policy SI 13 – Sustainable drainage

Policy T1 – Strategic approach to transport

Policy T2 – Healthy streets

Policy T3 - Transport capacity, connectivity and safeguarding

Policy T4 – Assessing and mitigating transport impacts

Policy T5 - Cycling

Policy T6 – Car parking

Policy T6.1 – Residential parking

Policy T6.2 – Office parking

Policy T6.5 – Non-residential disabled persons parking

Policy T7 – Deliveries, servicing and construction

Policy T9 – Funding transport infrastructure through planning

New Southwark Plan

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

These documents and the New Southwark Plan Submission Version (Proposed Modifications for Examination) were submitted to the Secretary of State in January 2020 for Local Plan Examination. The New Southwark Plan Submission Version

(Proposed Modifications for Examination) is the Council's current expression of the New Southwark Plan and responds to consultation on the NSP Proposed Submission Version.

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

It is anticipated that the plan will be adopted in 2021 following the EiP. As the NSP is not yet adopted policy, it can only be attributed limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.

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

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

ENVIRONMENTAL IMPACT ASSESSMENT

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

Human rights implications

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

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

395. None

BACKGROUND INFORMATION

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local	Chief Executive's	Planning enquiries telephone:
Development Framework	Department	020 7525 5403
and Development Plan	160 Tooley Street	Planning enquiries email:
Documents	London	planning.enquiries@southwark.gov.
	SE1 2QH	uk
		Case officer telephone:
		0207 525 1513
		Council website:
		www.southwark.gov.uk

APPENDICES

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

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning
Report Author	Troy Davies, Team Leader
Version	Final
Dated	9 December 2020
Key Decision	No

CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title	Comments Sought	Comments included	
Strategic Director of Finance and Governance	No	No	
Strategic Director of Environment and Leisure	No	No	
Strategic Director of Housing and Modernisation	No	No	
Director of Regeneration	No	No	
Date final report sent to Constitutional Team	14 December 2020		

Reference: 20/AP/1329 Case Officer: Troy Davies

Proposal: Demolition of existing buildings and construction of two buildings, one of part 11 and 13 storeys and one of part 13 and 15

storeys, to provide 1,526sq.m (GIA) of commercial floorspace (Use Class B1c), 250 student accommodation bed spaces (Sui Generis) and 58 residential units (Use Class C3), with associated access and highway works, amenity space, cycle parking

spaces, disabled car parking spaces and refuse/ recycling stores.

Location: 313-349 Ilderton Road London Southwark

Neighbours and Contributors

Name/Address	Letter Template	Period	Date Printed	Reply by
126 Crystal Palace Road London SE22 9ER Flat 45, Windermere Point Old-Kent Road London SE15 1DZ				
70 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - E	BULK	B28	16/06/2020
62 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - E 14.07.2020	BULK	B28	16/06/2020
Flat 5 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1E	Neighbour Notification Letter - E 14.07.2020	BULK	B28	16/06/2020
Flat 32 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1D	Neighbour Notification Letter - E 14.07.2020	BULK	B28	16/06/2020
20 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - E 14.07.2020	BULK	B28	16/06/2020
Flat 28 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1D	Neighbour Notification Letter - E 14.07.2020	BULK	B28	16/06/2020
Flat 12 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1D	Neighbour Notification Letter - E 14.07.2020	BULK	B28	16/06/2020
52 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - E 14.07.2020	BULK	B28	16/06/2020
41 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - E 14.07.2020	BULK	B28	16/06/2020
Flat B 28 Wagner Street London Southwark SE15 1NN	Neighbour Notification Letter - E 14.07.2020	BULK	B28	16/06/2020
13 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - E 14.07.2020	BULK	B28	16/06/2020
66 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB	Neighbour Notification Letter - E 14.07.2020	BULK	B28	16/06/2020

42 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
5 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
33 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
303 Ilderton Road London Southwark SE15 1NW	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
64 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
56 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
50 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
19 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
12 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
70 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
67 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
50 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
25 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 28 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 26 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 11 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1D	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 21 Radford Court 814 Old Kent Road London Southwark SE15 1AJ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 3 Radford Court 814 Old Kent Road London Southwark SE15 1AJ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 22 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
68 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
35 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK	B28	16/06/2020

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14 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
11 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 30 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1D	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 6 Radford Court 814 Old Kent Road London Southwark SE15 1AJ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
67 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
55 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
43 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
8 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
17 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 39 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
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Flat 27 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
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15 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 15 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1D	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
44 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
9 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 16 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 2 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 34 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020

Unit 31 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 21 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
70 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
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29 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
27 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
72 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
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45 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
9 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
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45 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
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21 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
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Flat 18 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 10 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 25 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1D	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 22 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1D	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
817 Old Kent Road London Southwark SE15 1NX	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Ground Floor Right 881-883 Old Kent Road London Southwark SE15 1NL	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
313-320 Ilderton Road London Southwark SE15 1NW	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Arch 57 Ilderton Road London Southwark SE15 1NW	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 18 Radford Court 814 Old Kent Road London Southwark SE15 1AJ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 19 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 7 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 6 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
321 - 331 Ilderton Road London Southwark SE15 1NW	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat B Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat D Grasmere Point Old Kent Road London Southwark SE1 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat C Grasmere Point Old Kent Road London Southwark SE1 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
58 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020

45 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
48 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 92 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Arch 70 897A Old Kent Road London Southwark SE15 1NL	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 19 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1D	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
57 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
7 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
20 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 31 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1D	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 13 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1D	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
24 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
71 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
64 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
50 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
3 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
21 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 98 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 93 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 32 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
67 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
54 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK	B28	16/06/2020

	14.07.2020		
Flat 23 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 9 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1E	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 26 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1D	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
6 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
887 Old Kent Road London Southwark SE15 1NL	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 20 Radford Court 814 Old Kent Road London Southwark SE15 1AJ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 11A Ullswater House Hillbeck Close London Southwark SE15 1EE	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
46 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
39 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
9 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
15 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
66 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
61 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
17 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
1 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
65 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
56 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
7 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
31 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
815 Old Kent Road London Southwark SE15 1NX	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020

Flat Above 881 Old Kent Road London Southwark SE15 1NL	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 89 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 87 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 83 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 76 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 68 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 43 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 41, Grenier Apartments 18 Gervase St London SE15 2RS			
Flat 8 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1E	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 2 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1E	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
811 Old Kent Road London Southwark SE15 1NX	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Canterbury Arms 871 Old Kent Road London Southwark SE15 1NX	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
1 Hornshay Street London Southwark SE15 1HB	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 37A Ullswater House Hillbeck Close London Southwark SE15 1EE	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 17A Ullswater House Hillbeck Close London Southwark SE15 1EE	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 10 Radford Court 814 Old Kent Road London Southwark SE15 1AJ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 8 Radford Court 814 Old Kent Road London Southwark SE15 1AJ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 25 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 12 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
321-343 Ilderton Road London Southwark SE15 1NW	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020

Concierge Court Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat B Grasmere Point Old Kent Road London Southwark SE1 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat A Ambleside Point Old Kent Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
32 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 86 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
5 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 23 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1D	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
42 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 40 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
28 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
40 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 31A Ullswater House Hillbeck Close London Southwark SE15 1EE	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
59 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
40 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
4 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
34 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
23 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 77 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 60 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 51 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
51 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK	B28	16/06/2020

	14.07.2020		
Flat 16 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 14 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 34 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1D	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
23 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 21 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1D	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
66 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 8 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 3 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 39 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
72 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
65 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
36 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
31 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
2 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
18 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
12 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
10 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
55 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
52 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
8 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020

15 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat Above 883 Old Kent Road London Southwark SE15 1NL	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 82 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 78 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 35 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 6 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1DS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 27 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1D	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 16 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1D	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
819 Old Kent Road London Southwark SE15 1NX	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 22A Ullswater House Hillbeck Close London Southwark SE15 1EE	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 16 Radford Court 814 Old Kent Road London Southwark SE15 1AJ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 15 Radford Court 814 Old Kent Road London Southwark SE15 1AJ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 11 Radford Court 814 Old Kent Road London Southwark SE15 1AJ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 36 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 32 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 27 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 23 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
33 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 18 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
59 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
42 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK	B28	16/06/2020

805-807 Old Kent Road London Southwark SE15 1NX Neighbour Notification Letter - BULK 14.07.2020	16/06/2020 16/06/2020
	16/06/2020
72 Grasmere Point Old Kent Road London Southwark SE15 1DU Neighbour Notification Letter - BULK B28 14.07.2020	10/00/2020
69 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020	16/06/2020
47 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020	16/06/2020
26 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA Neighbour Notification Letter - BULK 14.07.2020	16/06/2020
11 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA Neighbour Notification Letter - BULK 14.07.2020 14.07.2020	16/06/2020
Flat 81 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1 Neighbour Notification Letter - BULK B28 14.07.2020	16/06/2020
803 Old Kent Road London Southwark SE15 1NX Neighbour Notification Letter - BULK 14.07.2020	16/06/2020
Flat 67 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1 Neighbour Notification Letter - BULK B28 14.07.2020	16/06/2020
Flat 62 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1 Neighbour Notification Letter - BULK B28 14.07.2020	16/06/2020
Flat 53 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1 Neighbour Notification Letter - BULK B28 14.07.2020	16/06/2020
46 Windermere Point Old Kent Road London Southwark SE15 1DZ Neighbour Notification Letter - BULK B28 14.07.2020	16/06/2020
43 Windermere Point Old Kent Road London Southwark SE15 1DZ Neighbour Notification Letter - BULK B28 14.07.2020	16/06/2020
Flat 20 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1 Neighbour Notification Letter - BULK B28 14.07.2020	16/06/2020
28 Windermere Point Old Kent Road London Southwark SE15 1DY Neighbour Notification Letter - BULK 14.07.2020	16/06/2020
13 Windermere Point Old Kent Road London Southwark SE15 1DY Neighbour Notification Letter - BULK B28 14.07.2020	16/06/2020
26 Grasmere Point Old Kent Road London Southwark SE15 1DT Neighbour Notification Letter - BULK 14.07.2020	16/06/2020
16 Grasmere Point Old Kent Road London Southwark SE15 1DT Neighbour Notification Letter - BULK 14.07.2020	16/06/2020
Arch 71 897A Old Kent Road London Southwark SE15 1NL Neighbour Notification Letter - BULK B28 14.07.2020	16/06/2020
Flat 4 Radford Court 814 Old Kent Road London Southwark SE15 1AJ Neighbour Notification Letter - BULK B28 14.07.2020	16/06/2020

58 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
49 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
41 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
30 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
39 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
37 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
34 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
31 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
26 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
16 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
69 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
53 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
51 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
47 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
5 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
24 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
19 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
14 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
12 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
1 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 71 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK	B28	16/06/2020

	14.07.2020		
Flat 66 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 63 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 22 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
821 Old Kent Road London Southwark SE15 1NX	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 17 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 15 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 13 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 24 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1D	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Arch 69 897A Old Kent Road London Southwark SE15 1NL	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 13 Radford Court 814 Old Kent Road London Southwark SE15 1AJ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 9 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 32 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
24 Drovers Place London Southwark SE15 2RR	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 22 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 14 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 4 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
53 Clifton Crescent London Southwark SE15 2RX	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
40 Drovers Place London Southwark SE15 2RR	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
34 Drovers Place London Southwark SE15 2RR	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
31 Drovers Place London Southwark SE15 2RR	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020

7 Drovers Place London Southwark SE15 2RP	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
6 Drovers Place London Southwark SE15 2RP	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
812 Old Kent Road London Southwark SE15 1NH	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 6 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 39 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 35 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 27 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
33 Drovers Place London Southwark SE15 2RR	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
3 Drovers Place London Southwark SE15 2RP	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
19 Drovers Place London Southwark SE15 2RP	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
11 Drovers Place London Southwark SE15 2RP	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 24 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 2 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
46 Drovers Place London Southwark SE15 2RR	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
6 Burnhill Close London Southwark SE15 2RT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 28 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 18 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 17 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 7 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
2 Burnhill Close London Southwark SE15 2RT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 13 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK	B28	16/06/2020

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Flat 36 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 31 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
45 Drovers Place London Southwark SE15 2RR	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 5 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
8 Drovers Place London Southwark SE15 2RP	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
17 Drovers Place London Southwark SE15 2RP	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
25 Drovers Place London Southwark SE15 2RR	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
5 Burnhill Close London Southwark SE15 2RT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 11 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 8 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 43 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 23 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
41 Drovers Place London Southwark SE15 2RR	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
9 Drovers Place London Southwark SE15 2RP	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
23 Drovers Place London Southwark SE15 2RP	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
2 Drovers Place London Southwark SE15 2RP	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 37 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 29 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 25 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 15 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020

Flat 9 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
44 Drovers Place London Southwark SE15 2RR	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
36 Drovers Place London Southwark SE15 2RR	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
29 Drovers Place London Southwark SE15 2RR	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
4 Drovers Place London Southwark SE15 2RP	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
18 Drovers Place London Southwark SE15 2RP	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 1 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
16 Drovers Place London Southwark SE15 2RP	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 40 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 12 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
28 Drovers Place London Southwark SE15 2RR	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
22 Drovers Place London Southwark SE15 2RP	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
3 Burnhill Close London Southwark SE15 2RT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
14 Drovers Place London Southwark SE15 2RP	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 42 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 34 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 19 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 10 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
51 Clifton Crescent London Southwark SE15 2RX	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
43 Drovers Place London Southwark SE15 2RR	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
42 Drovers Place London Southwark SE15 2RR	Neighbour Notification Letter - BULK	B28	16/06/2020

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4 Burnhill Close London Southwark SE15 2RT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
1 Burnhill Close London Southwark SE15 2RT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Basement Flat Grenier Apartments 18 Gervase Street London Southwark SE15 2R	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 38 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
35 Drovers Place London Southwark SE15 2RR	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 16 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 41 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 21 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
30 Drovers Place London Southwark SE15 2RR	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
27 Drovers Place London Southwark SE15 2RR	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
5 Drovers Place London Southwark SE15 2RP	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 30 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 20 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
54 Clifton Crescent London Southwark SE15 2RX	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
39 Drovers Place London Southwark SE15 2RR	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
32 Drovers Place London Southwark SE15 2RR	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
26 Drovers Place London Southwark SE15 2RR	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
13 Drovers Place London Southwark SE15 2RP	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
12 Drovers Place London Southwark SE15 2RP	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 33 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020

Flat 3 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 26 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
52 Clifton Crescent London Southwark SE15 2RX	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
10 Drovers Place London Southwark SE15 2RP	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
21 Drovers Place London Southwark SE15 2RP	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
20 Drovers Place London Southwark SE15 2RP	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
15 Drovers Place London Southwark SE15 2RP	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
1 Drovers Place London Southwark SE15 2RP	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 49 Grenier Apartments 18 Gervase Street London Southwark SE15 2RS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Tustin Community Association Residents Hall Windermere Point Old Kent Road	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat D Ambleside Point Old Kent Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat B Ambleside Point Old Kent Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 11 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
63 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 11 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 14 Radford Court 814 Old Kent Road London Southwark SE15 1AJ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 80 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
41 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
7 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 19 Radford Court 814 Old Kent Road London Southwark SE15 1AJ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 15 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK	B28	16/06/2020

Se Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB 25 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB 14,07.2020 Flat 96 Heversham House Tustin Estate liderton Road London Southwark SE15 1 Na Highbour Notification Letter - BULK 14,07.2020 Flat 96 Heversham House Tustin Estate liderton Road London Southwark SE15 1 Na Highbour Notification Letter - BULK 14,07.2020 Flat 55 Heversham House Tustin Estate liderton Road London Southwark SE15 1 Na Highbour Notification Letter - BULK 14,07.2020 Flat 38 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1 Na Highbour Notification Letter - BULK 14,07.2020 8 Windermere Point Old Kent Road London Southwark SE15 1DY 14,07.2020 8 Windermere Point Old Kent Road London Southwark SE15 1DY 14,07.2020 Flat 17 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1D 14,07.2020 60 Grasmere Point Old Kent Road London Southwark SE15 1DU 14,07.2020 38 Grasmere Point Old Kent Road London Southwark SE15 1DU 14,07.2020 10 Grasmere Point Old Kent Road London Southwark SE15 1DT 14,07.2020 10 Grasmere Point Old Kent Road London Southwark SE15 1DT 15,07.2020 10 Grasmere Point Old Kent Road London Southwark SE15 1DT 16,06/2020 10 Grasmere Point Old Kent Road London Southwark SE15 1DT 16,06/2020 10 Grasmere Point Old Kent Road London Southwark SE15 1DT 16,06/2020 10 Grasmere Point Old Kent Road London Southwark SE15 1DT 16,06/2020 10 Grasmere Point Old Kent Road London Southwark SE15 1DT 16,06/2020 10 Grasmere Point Old Kent Road London Southwark SE15 1DT 16,06/2020 10 Grasmere Point Old Kent Road London Southwark SE15 1DT 16,06/2020 10 Grasmere Point Old Kent Road London Southwark SE15 1ED 16,06/2020 10 Grasmere Point Old Kent Road London Southwark SE15 1ED 16,06/2020 10 Grasmere Point Old Kent Road London Southwark SE15 1ED 16,06/2020 10 Grasmere Point Old Kent Road London Southwark SE15 1ED 16,06/2020 10 Grasmere Point Old Kent Road London Southwark SE15 1ED 16,06/2020 10 Grasmere Point Old Kent		14.07.2020		
14.07 2020	62 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB	Neighbour Notification Letter - BULK	B28	16/06/2020
Flat 96 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1 Neighbour Notification Letter - BULK 14.07.2020 14.07.2020 Neighbour Notification Letter - BULK 14	52 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB		B28	16/06/2020
789-799 Old Kent Road London Southwark SE15 1NZ	Flat 96 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK	B28	16/06/2020
Flat 55 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1 Neighbour Notification Letter - BULK 14.07.2020 Righbour Notification Letter - BULK 14.07.2020 Living Accommodation Canterbury Arms 871 Old Kent Road London Southwark SE15 1DT 14.07.2020 Living Accommodation Canterbury Arms 871 Old Kent Road London Southwark SE15 1ED 14.07.2020 Righbour Notification Letter - BULK 14.07.2020 Righbou	789-799 Old Kent Road London Southwark SE15 1NZ	Neighbour Notification Letter - BULK	B28	16/06/2020
8 Windermere Point Old Kent Road London Southwark SE15 1DY 14.07.2020 Flat 17 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1D 60 Grasmere Point Old Kent Road London Southwark SE15 1DU 14.07.2020 38 Grasmere Point Old Kent Road London Southwark SE15 1DU 14.07.2020 38 Grasmere Point Old Kent Road London Southwark SE15 1DU 14.07.2020 20 Grasmere Point Old Kent Road London Southwark SE15 1DU 21 Reighbour Notification Letter - BULK B28 16/06/2020 21 Have a separate Point Old Kent Road London Southwark SE15 1DT 16/06/2020 22 Grasmere Point Old Kent Road London Southwark SE15 1DT 16/06/2020 23 Grasmere Point Old Kent Road London Southwark SE15 1DT 16/06/2020 24 Living Accommodation Canterbury Arms 871 Old Kent Road London Southwark SE1 Neighbour Notification Letter - BULK B28 16/06/2020 25 Living Accommodation Canterbury Arms 871 Old Kent Road London Southwark SE1 Neighbour Notification Letter - BULK B28 16/06/2020 26 Living Accommodation Canterbury Arms 871 Old Kent Road London Southwark SE1 Neighbour Notification Letter - BULK B28 16/06/2020 27 Living Accommodation Canterbury Arms 871 Old Kent Road London Southwark SE15 1ED 17 Neighbour Notification Letter - BULK B28 16/06/2020 28 Living Accommodation Canterbury Arms 871 Old Kent Road London Southwark SE15 1ED 17 Neighbour Notification Letter - BULK B28 16/06/2020 28 Living Accommodation Canterbury Arms 871 Old Kent Road London Southwark SE15 1ED 18 Neighbour Notification Letter - BULK B28 16/06/2020 28 Living Accommodation Canterbury Arms 871 Old Kent Road London Southwark SE15 1EB Neighbour Notification Letter - BULK B28 16/06/2020 28 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK B28 16/06/2020 29 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK B28 16/06/2020 20 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK B28 16/06/2020 20 Ambleside Point Tustin Estate Patter	Flat 55 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK	B28	16/06/2020
Flat 17 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1D Neighbour Notification Letter - BULK 14.07.2020 60 Grasmere Point Old Kent Road London Southwark SE15 1DU Neighbour Notification Letter - BULK 14.07.2020 38 Grasmere Point Old Kent Road London Southwark SE15 1DU Neighbour Notification Letter - BULK 14.07.2020 20 Grasmere Point Old Kent Road London Southwark SE15 1DT Neighbour Notification Letter - BULK 14.07.2020 Living Accommodation Canterbury Arms 871 Old Kent Road London Southwark SE1 Neighbour Notification Letter - BULK 14.07.2020 Living Accommodation Canterbury Arms 871 Old Kent Road London Southwark SE1 Neighbour Notification Letter - BULK 14.07.2020 Living Accommodation Canterbury Arms 871 Old Kent Road London Southwark SE1 Neighbour Notification Letter - BULK 14.07.2020 Living Accommodation Canterbury Arms 871 Old Kent Road London Southwark SE1 Neighbour Notification Letter - BULK 14.07.2020 Living Accommodation Canterbury Arms 871 Old Kent Road London Southwark SE15 1ED Neighbour Notification Letter - BULK 14.07.2020 Unit 13 Ullswater House Hillbeck Close London Southwark SE15 1ED Neighbour Notification Letter - BULK 14.07.2020 Unit 29A Ullswater House Hillbeck Close London Southwark SE15 1ED Neighbour Notification Letter - BULK 14.07.2020 68 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 48 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 37 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 55 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 55 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 56 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.202	Flat 3 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1DS	•	B28	16/06/2020
60 Grasmere Point Old Kent Road London Southwark SE15 1DU Neighbour Notification Letter - BULK 14.07.2020 38 Grasmere Point Old Kent Road London Southwark SE15 1DU Neighbour Notification Letter - BULK 14.07.2020 20 Grasmere Point Old Kent Road London Southwark SE15 1DT Neighbour Notification Letter - BULK 14.07.2020 Living Accommodation Canterbury Arms 871 Old Kent Road London Southwark SE1 Neighbour Notification Letter - BULK 14.07.2020 Living Accommodation Canterbury Arms 871 Old Kent Road London Southwark SE1 Neighbour Notification Letter - BULK 14.07.2020 Unit 13 Ullswater House Hillbeck Close London Southwark SE15 1ED Neighbour Notification Letter - BULK 14.07.2020 814A Old Kent Road London Southwark SE15 1AJ Neighbour Notification Letter - BULK 14.07.2020 Unit 29A Ullswater House Hillbeck Close London Southwark SE15 1ED Neighbour Notification Letter - BULK 14.07.2020 68 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 56 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 48 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 37 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 25 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 37 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 25 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 25 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 25 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA Neighbour Notification Letter - BULK 14.07.2020	8 Windermere Point Old Kent Road London Southwark SE15 1DY		B28	16/06/2020
38 Grasmere Point Old Kent Road London Southwark SE15 1DU Neighbour Notification Letter - BULK 14.07.2020 20 Grasmere Point Old Kent Road London Southwark SE15 1DT Neighbour Notification Letter - BULK 14.07.2020 Living Accommodation Canterbury Arms 871 Old Kent Road London Southwark SE1 Neighbour Notification Letter - BULK 14.07.2020 Living Accommodation Canterbury Arms 871 Old Kent Road London Southwark SE1 Neighbour Notification Letter - BULK 14.07.2020 Unit 13 Ullswater House Hillbeck Close London Southwark SE15 1ED Neighbour Notification Letter - BULK 14.07.2020 14.07.2020 Unit 29A Ullswater House Hillbeck Close London Southwark SE15 1ED Neighbour Notification Letter - BULK 14.07.2020 Meighbour Notification Letter - BULK 14.07.2020 Neighbour Notification Letter - BULK 14.07.2020	Flat 17 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1D		B28	16/06/2020
20 Grasmere Point Old Kent Road London Southwark SE15 1DT 20 Grasmere Point Old Kent Road London Southwark SE15 1DT 21 Neighbour Notification Letter - BULK 14.07.2020 Living Accommodation Canterbury Arms 871 Old Kent Road London Southwark SE1 Neighbour Notification Letter - BULK 14.07.2020 Unit 13 Ullswater House Hillbeck Close London Southwark SE15 1ED 21 Neighbour Notification Letter - BULK 14.07.2020 22 Neighbour Notification Letter - BULK 14.07.2020 23 Neighbour Notification Letter - BULK 14.07.2020 24 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 25 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 37 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 25 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 37 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 25 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 25 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 25 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA Neighbour Notification Letter - BULK 14.07.2020 25 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA Neighbour Notification Letter - BULK 14.07.2020 26 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA Neighbour Notification Letter - BULK 14.07.2020	60 Grasmere Point Old Kent Road London Southwark SE15 1DU		B28	16/06/2020
Living Accommodation Canterbury Arms 871 Old Kent Road London Southwark SE1 Neighbour Notification Letter - BULK 14.07.2020 Unit 13 Ullswater House Hillbeck Close London Southwark SE15 1ED Neighbour Notification Letter - BULK 14.07.2020 814A Old Kent Road London Southwark SE15 1AJ Neighbour Notification Letter - BULK 14.07.2020 Unit 29A Ullswater House Hillbeck Close London Southwark SE15 1ED Neighbour Notification Letter - BULK 14.07.2020 68 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 56 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 48 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 48 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 37 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 25 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 25 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA Neighbour Notification Letter - BULK 14.07.2020 25 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA Neighbour Notification Letter - BULK 14.07.2020	38 Grasmere Point Old Kent Road London Southwark SE15 1DU		B28	16/06/2020
Unit 13 Ullswater House Hillbeck Close London Southwark SE15 1ED Neighbour Notification Letter - BULK 14.07.2020 Neighbour Notification Letter - BULK 14.07.2020 Neighbour Notification Letter - BULK 14.07.2020 Unit 29A Ullswater House Hillbeck Close London Southwark SE15 1ED Neighbour Notification Letter - BULK 14.07.2020	20 Grasmere Point Old Kent Road London Southwark SE15 1DT		B28	16/06/2020
814A Old Kent Road London Southwark SE15 1AJ Neighbour Notification Letter - BULK 14.07.2020 Unit 29A Ullswater House Hillbeck Close London Southwark SE15 1ED Neighbour Notification Letter - BULK 14.07.2020	Living Accommodation Canterbury Arms 871 Old Kent Road London Southwark SE1		B28	16/06/2020
Unit 29A Ullswater House Hillbeck Close London Southwark SE15 1ED Neighbour Notification Letter - BULK 14.07.2020 Neighbour Notification Letter - BULK 16/06/2020 14.07.2020 Neighbour Notification Letter - BULK 16/06/2020 14.07.2020 Neighbour Notification Letter - BULK 16/06/2020 16/06/2020	Unit 13 Ullswater House Hillbeck Close London Southwark SE15 1ED	•	B28	16/06/2020
14.07.2020 68 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 Neighbour Notification Letter - BULK 16/06/2020 Neighbour Notification Letter - BULK 16/06/2020 Neighbour Notification Letter - BULK 16/06/2020	814A Old Kent Road London Southwark SE15 1AJ		B28	16/06/2020
14.07.2020 56 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB 48 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020	Unit 29A Ullswater House Hillbeck Close London Southwark SE15 1ED		B28	16/06/2020
48 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 37 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020	68 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB		B28	16/06/2020
14.07.2020 37 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB Neighbour Notification Letter - BULK 14.07.2020 25 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA Neighbour Notification Letter - BULK B28 16/06/2020	56 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB		B28	16/06/2020
14.07.2020 25 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA Neighbour Notification Letter - BULK B28 16/06/2020	48 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB		B28	16/06/2020
25 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA Neighbour Notification Letter - BULK B28 16/06/2020	37 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB	Neighbour Notification Letter - BULK	B28	16/06/2020
	25 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK	B28	16/06/2020

24 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
22 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
16 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
68 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
47 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
11 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
37 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
4 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
34 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
32 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
22 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
17 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 97 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 90 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 85 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 73 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 56 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 42 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 33 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
The Redeemed Christian Church Of God 30 Wagner Street London Southwark SE15	14.07.2020	B28	16/06/2020
Flat 7 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1DS	Neighbour Notification Letter - BULK	B28	16/06/2020

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Flat 4 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1DS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 33 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1D	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 18 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1D	Neighbour Notification Letter - BULK 14.07,2020	B28	16/06/2020
Unit 10A Ullswater House Hillbeck Close London Southwark SE15 1EE	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 15A Ullswater House Hillbeck Close London Southwark SE15 1EE	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 40 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07,2020	B28	16/06/2020
Unit 14 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat E Grasmere Point Old Kent Road London Southwark SE1 1DU	Neighbour Notification Letter - BULK 14.07,2020	B28	16/06/2020
73 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 1 Radford Court 814 Old Kent Road London Southwark SE15 1AJ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 65 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Arch 68 897A Old Kent Road London Southwark SE15 1NL	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
53 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
63 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
3 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 91 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 48 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
54 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
1 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 84 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020

Flat 72 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 13 Canterbury Industrial Park 297 Ilderton Road London Southwark SE15	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
65 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
59 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
57 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
38 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 8 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1DS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
35 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
33 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 10 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1D	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
55 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
46 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
36 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
13 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
809 Old Kent Road London Southwark SE15 1NX	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
349 Ilderton Road London Southwark SE15 1NW	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Pilgrims Way Junior And Infant School Manor Grove London Southwark SE15 1EF	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 37 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
63 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
810 Old Kent Road London Southwark SE15 1AJ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
69 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK	B28	16/06/2020

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44 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
4 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
3 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
64 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
62 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
43 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
40 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
28 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Tustin Community Centre 328 Ilderton Road London Southwark SE15 1NT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 75 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 70 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 57 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 54 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 52 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 36 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 31 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 29 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 21 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 29 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1D	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
885 Old Kent Road London Southwark SE15 1NL	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020

Flat 5 Radford Court 814 Old Kent Road London Southwark SE15 1AJ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 2 Radford Court 814 Old Kent Road London Southwark SE15 1AJ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 38 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 30 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 28 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 17 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 4 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat A 28 Wagner Street London Southwark SE15 1NN	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
1A Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat C Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat A Grasmere Point Old Kent Road London Southwark SE1 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat C Ambleside Point Old Kent Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
35 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
32 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
801 Old Kent Road London Southwark SE15 1NX	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 64 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 4 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1E	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 1 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1DS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
18 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 17 Radford Court 814 Old Kent Road London Southwark SE15 1AJ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
38 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB	Neighbour Notification Letter - BULK	B28	16/06/2020

	14.07.2020		
14 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 88 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 79 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 58 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 44 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 37 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 25 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 19 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 5 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1DS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
30 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
25 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
10 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
71 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
49 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
29 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
23 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
18 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
10 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
301 Ilderton Road London Southwark SE15 1NW	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
2 Hornshay Street London Southwark SE15 1HB	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020

Ground Floor Left 881-883 Old Kent Road London Southwark SE15 1NL	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 5 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 12 Radford Court 814 Old Kent Road London Southwark SE15 1AJ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 9 Radford Court 814 Old Kent Road London Southwark SE15 1AJ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 7 Radford Court 814 Old Kent Road London Southwark SE15 1AJ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 29 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 24 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
61 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
51 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat Above 885 Old Kent Road London Southwark SE15 1NL	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
53 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
49 Windermere Point Old Kent Road London Southwark SE15 1DZ	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
6 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
36 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
29 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
27 Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
61 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
58 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
48 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
27 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
813 Old Kent Road London Southwark SE15 1NX	Neighbour Notification Letter - BULK	B28	16/06/2020

	14.07.2020		
Flat 95 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 47 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 45 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 12 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 9 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1DS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 20 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1D	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 2 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1DS	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 14 Bowness House Tustin Estate Hillbeck Close London Southwark SE15 1D	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 33 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 10 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat A Windermere Point Old Kent Road London Southwark SE15 1DY	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat F Grasmere Point Old Kent Road London Southwark SE1 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 46 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
30 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 20 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 1 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1E	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 26 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 61 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 38 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 6 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1E	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020

54 Grasmere Point Old Kent Road London Southwark SE15 1DU	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
2 Grasmere Point Old Kent Road London Southwark SE15 1DT	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Unit 35 Ullswater House Hillbeck Close London Southwark SE15 1ED	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
57 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EB	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
6 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
19 Ambleside Point Tustin Estate Patterdale Road London Southwark SE15 1EA	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 74 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 69 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 41 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
Flat 30 Heversham House Tustin Estate Ilderton Road London Southwark SE15 1	Neighbour Notification Letter - BULK 14.07.2020	B28	16/06/2020
68 Grasmere Point Old Kent Rd London SE15 1DU			

Reference: 20/AP/1329 Case Officer: Troy Davies

Proposal: Demolition of existing buildings and construction of two buildings, one of part 11 and 13 storeys and one of part 13 and

15 storeys, to provide 1,526sq.m (GIA) of commercial floorspace (Use Class B1c), 250 student accommodation bed spaces (Sui Generis) and 58 residential units (Use Class C3), with associated access and highway works, amenity

space, cycle parking spaces, disabled car parking spaces and refuse/ recycling stores.

Location: 313-349 Ilderton Road London Southwark

Consultees

LBS Archaeologist Arqiva Civil Aviation Authority LBS Community Infrastructure Team LBS Design And Conservation Team [Formal Consultation] LBS Local Economy Team LBS Ecology	STDCN STDCN STDCN STDCN STDCN STDCN STDCN STDCN	Internal and external consultatees	19.05.2020 19.05.2020 19.05.2020 19.05.2020 19.05.2020 19.05.2020 19.05.2020
Environment Agency	STDCN	Internal and external consultatees	19.05.2020
LBS Environmental Protection Team	STDCN	Internal and external consultatees	19.05.2020
Greater London Authority	STDCN	Internal and external consultatees	19.05.2020
LBS Highways Development And Management	STDCN	Internal and external consultatees	19.05.2020
HE - Heritage	STDCN	Internal and external consultatees	19.05.2020
Health And Safety Executive	STDCN	Internal and external consultatees	19.05.2020
Lewisham Planning Department	STDCN	Internal and external consultatees	19.05.2020
London Fire & Emergency Planning Authority	STDCN	Internal and external consultatees	19.05.2020
London Underground	STDCN	Internal and external consultatees	19.05.2020
Natural England - London Region & South East Region	STDCN	Internal and external consultatees	19.05.2020
National Air Traffic Safeguarding Office	STDCN	Internal and external consultatees	19.05.2020
Network Rail	STDCN	Internal and external consultatees	19.05.2020
Metropolitan Police Service (Designing Out Crime)	STDCN	Internal and external consultatees	19.05.2020
LBS Flood Risk Management & Urban Drainage Team	STDCN	Internal and external consultatees	19.05.2020
Transport For London	STDCN	Internal and external consultatees	19.05.2020
LBS Transport Policy Team	STDCN	Internal and external consultatees	19.05.2020
Thames Water	STDCN	Internal and external consultatees	19.05.2020
LBS Urban Forester	STDCN	Internal and external consultatees	19.05.2020
Vital OKR	STDCN	Internal and external consultatees	19.05.2020
LBS Waste Management Team	STDCN	Internal and external consultatees	19.05.2020

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.

Applicant TRIBE STUDENT HOUSING LTD Reg. 20/AP/1329

Number

Application Type Full Planning Application

Recommendatio Grant subject to Legal Agreement Case TP/2327-K

Number

Draft of Decision Notice

Planning Permission was GRANTED for the following development:

Demolition of existing buildings and construction of two buildings, one of part 11 and 13 storeys and one of part 13 and 15 storeys, to provide 1,526sq.m (GIA) of commercial floorspace, 250 student accommodation bed spaces (Sui Generis) and 58 residential units, with associated access and highway works, amenity space, cycle parking spaces, disabled car parking spaces and refuse/ recycling stores.

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

At: 313-349 ILDERTON ROAD, LONDON, SE15 1NW

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

PROPOSED PLANS

3019 GA-SP-B01 REV P4 – BASEMENT FLOOR PLAN

3019 GA-SP-L00 REV P5 - GROUND FLOOR PLAN

3019 GA-SP-L01 REV P4 - FIRST FLOOR PLAN

3019 GA-SP-L02 REV P6 - SECOND FLOOR PLAN

3019 GA-SP-L03 REV P4 - THIRD FLOOR PLAN

3019 GA-SP-L04 REV P4 – FOURTH FLOOR PLAN

3019 GA-SP-L05 REV P4 - FIFTH FLOOR PLAN

3019 GA-SP-L06 REV P4 - SIXTH FLOOR PLAN

3019 GA-SP-L07 REV P4 - SEVENTH FLOOR PLAN

3019 GA-SP-L08 REV P4 – EIGHTH FLOOR PLAN

3019 GA-SP-L09 REV P4 - NINTH FLOOR PLAN

3019 GA-SP-L10 REV P4 -TENTH FLOOR PLAN

3019_GA-SP-L11 REV P4 – ELEVENTH FLOOR PLAN 3019_GA-SP-L12 REV P4 – TWELFTH FLOOR PLAN 3019_GA-SP-L13 REV P4 – THIRTEENTH FLOOR PLAN 3019_GA-SP-L14 REV P4 – FOURTEENTH FLOOR PLAN 3019_GA-SP-L15 REV P4 – ROOF PLAN

CORE A:

3019_GA-P-A-B01 REV P5 – BASEMENT FLOOR PLAN
3019_GA-P-A-L00 REV P5 – GROUND FLOOR PLAN
3019_GA-P-A-L01 REV P5 – FIRST FLOOR PLAN
3019_GA-P-A-L02-10 REV P6 – SECOND TO TENTH FLOOR PLAN
3019_GA-P-A-L11 REV P5 – ELEVENTH FLOOR PLAN
3019_GA-P-A-L12 REV P5 – TWELFTH FLOOR PLAN
3019_GA-P-A-L13-14 REV P5 – THIRTEENTH AND FOURTEEENTH FLOOR PLAN
3019_GA-P-A-L15 REV P5 – ROOF PLAN

CORE B:

3019_GA-P-B-B01 REV P5 – BASEMENT FLOOR PLAN
3019_GA-P-B-L00 REV P5 – GROUND FLOOR PLAN
3019_GA-P-B-L01 REV P5 – FIRST FLOOR PLAN
3019_GA-P-B-L02 REV P6 – SECOND FLOOR PLAN
3019_GA-P-B-L03-07 REV P5 – THIRD TO SEVENTH FLOOR PLAN
3019_GA-P-B-L08 REV P9 – EIGHTH FLOOR PLAN
3019_GA-P-B-L09-10 REV P5 – NINTH TO TENTH FLOOR PLAN
3019_GA-P-B-L11-12 REV P8 – ELEVENTH TO TWELFTH FLOOR PLAN
3019_GA-P-B-L13 REV P5 – ROOF PLAN

ELEVATIONS:

3019_GA-E-AB-E REV P3 - CORE A-B EAST ELEVATION 3019_GA-E-AB-W REV P3 - CORE A-B WEST ELEVATION 3019_GA-E-A-E REV P3 - CORE A - EAST ELEVATION 3019_GA-E-A-N REV P3 - CORE A - NORTH ELEVATION 3019_GA-E-A-W REV P3 - CORE A - WEST ELEVATION 3019_GA-E-A-S REV P3 - CORE A - SOUTH ELEVATION 3019_GA-E-B-E REV P3 - CORE B - EAST ELEVATION 3019_GA-E-B-N REV P3 - CORE B - NORTH ELEVATION 3019_GA-E-B-W REV P3 - CORE B - WEST ELEVATION 3019_GA-E-B-S REV P3 - CORE B - SOUTH ELEVATION

SECTIONS:

3019_GA-S-AB-01 REV P3 - CORE A-B SECTION 01

PROPOSED FLAT LAYOUTS:

3019_GA-P-A-FT-01 REV P3 – CORE A – FLAT TYPES 01 - 04 3019_GA-P-A-FT-02 REV P3 – CORE A – FLAT TYPES 05 - 06

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3019_GA-P-B-FT-01 REV P3 - CORE B - FLAT TYPES 01 3019_GA-P-B-FT-02 REV P3 - CORE B - FLAT TYPES 02 3019_GA-P-B-FT-03 REV P3 - CORE B - FLAT TYPES 03 3019_GA-P-B-FT-04 REV P3 - CORE B - FLAT TYPES 04 3019_GA-P-B-FT-05 REV P3 - CORE B - FLAT TYPES 05 3019_GA-P-B-FT-06 REV P3 - CORE B - FLAT TYPES 06 3019_GA-P-B-FT-07 REV P3 - CORE B - FLAT TYPES 07 3019_GA-P-B-FT-08 REV P3 - CORE B - FLAT TYPES 08 3019_GA-P-B-FT-09 REV P3 - CORE B - FLAT TYPES 09 3019_GA-P-B-FT-10 REV P3 - CORE B - FLAT TYPES 10 3019_GA-P-B-FT-11 REV P3 - CORE B - FLAT TYPES 11 3019_GA-P-B-FT-12 REV P3 - CORE B - FLAT TYPES 12 3019_GA-P-B-FT-13 REV P3 - CORE B - FLAT TYPES 13
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Reason:

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

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.

- No development shall take place, including any works of demolition, until a written 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.
- A commitment that all NRMM equipment (37 kw and 560 kW) shall be registered on the NRMM register and meets the standard as stipulated by the Mayor of London

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

- Southwark Council's Technical Guide for Demolition and Construction at http://www.southwark.gov.uk/construction
- Section 61 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. Noise',
- BS 5228-2:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Vibration'
- 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 Stage 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/

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 (2019).

- 4 a) Prior to the commencement of any development other than demolition works, a Phase 2 site investigation and risk assessment in relation to groundwater impacts shall be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site.
 - b) In the event that contamination is present, a detailed remediation and/or mitigation strategy shall be prepared and submitted to the Local Planning Authority for approval in writing to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, controlled waters, buildings and other property and the natural and historical environment. The approved remediation scheme (if required) shall be implemented during the development works.
 - c) Following the completion of the works and measures identified in the approved remediation strategy, a verification report shall be submitted providing evidence that all works required by the remediation strategy have been completed.
 - d) In the event that potential contamination is found at any time when carrying out the approved development that was not previously identified, it shall be reported in writing immediately to the Local Planning Authority, and a scheme of investigation and risk assessment, a remediation strategy and verification report (if required) shall be submitted to the Local Planning Authority for approval in writing, in accordance with a-c above.

Reason:

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with saved policy 3.2 'Protection of amenity' of the Southwark Plan (2007), strategic policy 13' High environmental standards' of the Core Strategy (2011) and the National Planning Policy Framework 2019.

Once groundwater levels are identified by on site ground investigation and prior to the beginning of works, the applicant shall submit a Basement Impact Assessment to and be approved in writing by the Local Planning Authority. The update should include an assessment of the continuation and fluctuations of groundwater flows, and whether the lowest point of the basement is above, or below the recorded groundwater levels recorded from the ground investigations, and any mitigation measures required. The development and mitigation measures shall be carried out in accordance with the approved details. Further details on preparation of BIA's for flood risk can be found in appendix to Southwark's 2016 SFRA: https://www.southwark.gov.uk/environment/flood-risk-management/strategic-flood-risk-assessmentsfra-chapter=2

Reason: To minimise the potential for the site to contribute to changes in groundwater conditions and any subsequent flooding in accordance with the Southwark Strategic Flood Risk Assessment (2017); And to minimise the potential for the site to contribute to surface water flooding in accordance with saved policy 3.9 Water of the Southwark Plan, Strategic policy 13

of the Core Strategy (2011) and guidance in the Sustainable Design and Construction SPD (2009).

Before any work hereby authorised begins, a detailed scheme showing the complete scope and arrangement of the foundation design and all ground works shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any such approval given.

Reason: In order that details of the foundations, ground works and all below ground impacts of the proposed development are detailed and accord with the programme of archaeological mitigation works to ensure the preservation of archaeological remains by record and in situ in accordance with Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and the National Planning Policy Framework 2019.

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

Reason: In order that the applicants supply the necessary archaeological information to ensure suitable mitigation measures and/or foundation design proposals be presented in accordance with Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and the National Planning Policy Framework 2019.

Before any work hereby authorised begins, the applicant shall secure the implementation of a programme of archaeological mitigation works in accordance with a written scheme of investigation, which shall be submitted to and approved in writing by the Local Planning Authority and shall not be carried out other than in accordance with any such approval given.

Reason

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

9 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.

No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.

Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure.

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 Prior to the commencement of any above grade works (excluding demolition), details of swift bricks shall be submitted to and approved in writing by the Local Planning Authority. No less than 18 Swift bricks on the roof of the eastern elevation, and 3 nest boxes for house sparrows in the brick work on the East elevation of Core B and the South elevation of Core A. shall be provided and the details shall include the exact location, specification and design of the habitats. The bricks and house sparrows 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 bricks and house sparrows shall be installed 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: 5.10 and 7.19 of the London Plan 2011, Policy 3.28 of the Southwark Plan and Strategic Policy 11 of the Southwark Core Strategy.

- Prior to commencement of any works above grade (excluding demolition), detailed drawings at a scale of 1:5 or 1:10 through:
 - i) all facade variations; and
 - ii) commercial fronts and residential entrances; and
 - iii) all parapets and roof edges; and
 - iv) all balcony details; and
 - v) heads, cills and jambs of all openings

to be used in the carrying out of this permission shall be submitted to and approved by the Local Planning Authority in writing. The development shall not be carried out otherwise than in

accordance with any such approval given.

Reason:

In order that the Local Planning Authority may be satisfied as to the quality of the design and details in accordance with the National Planning Policy Framework 2019, Policy 7.7 Location and Design of Tall Buildings of the London Plan 2016, Strategic Policy SP12 'Design & Conservation - of the Core Strategy (2011) and Saved Policies: 3.12 Quality in Design; 3.13 Urban Design; and 3.20 Tall buildings of The Southwark Plan (2007).

Prior to the commencement of any above grade works (excluding demolition), samples of all external facing materials and full-scale (1:1) mock-ups of the facades 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. The facades to be mocked up should be agreed with the Local Planning Authority.

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 the National Planning Policy Framework 2019, Policy 7.7 of the London Plan 2016, Strategic Policy SP12 ' Design & Conservation - of the Core Strategy (2011) and Saved Policies: 3.12 Quality in Design; 3.13 Urban Design; and 3.20 Tall buildings of The Southwark Plan (2007)

14 Prior to the commencement of any above grade works (excluding demolition), details of security measures shall be submitted and approved in writing by the Local Planning Authority and any such security measures shall be implemented prior to occupation in accordance with the approved details which shall 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 Prior to the commencement of any above grade works (excluding demolition), details and 1:50 scale drawings of the secure cycle parking facilities and servicing layout and its relationship with the public highway shall be submitted to be approved in writing by the Local Planning Authority. The cycle parking facilities shall be provided prior to the occupation of the development and thereafter 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.

- Prior to the commencement of any above grade works (excluding demolition), details of the biodiversity (green/brown) roof(s) shall be submitted to and approved in writing by the Local Planning Authority. The biodiversity (green/brown) roof(s) shall be:
 - * biodiversity based with extensive substrate base (depth 80-150mm);
 - * laid out in accordance with agreed plans; and
 - * planted/seeded with an agreed mix of species within the first planting season following the practical completion of the building works (focused on wildflower planting, and no more than a maximum of 25% sedum coverage).

The biodiversity (green/brown) roof shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair or escape in case of emergency. The biodiversity roof(s) shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter. Discharge of this condition will be granted on receiving the details of the green/brown roof(s) and Southwark Council agreeing the submitted plans. A post completion assessment will be required to confirm the roof has been constructed to the agreed specification.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with: Policies 2.18 (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.

17 Prior to the commencement of any above grade works (excluding demolition), 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 3) 'wheelchair user dwellings':- at least 10% M4 (Category 2) 'accessible and adaptable':- remaining units

Reason:

In order to ensure the development complies with Core Strategy 2011 Strategic Policy 5 (Providing new homes) and London Plan 2016 Policy 3.8 (Housing choice).

18 Prior to the commencement of any above grade works (excluding demolition), full particulars of the sprinkler system to be used within the ground floor units shall be submitted to and approved

by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with any approval given.

Reason:

To ensure that there is an adequate level of fire safety within this mixed use development.

Prior to the commencement of any above grade works (excluding demolition), details of the specification of glass with an appropriate reflectivity, demonstrating that levels of glare would be reduced to a tolerable level at all times, to be used in the carrying out of this permission shall be submitted to and approved by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

To ensure that occupiers of neighbouring premises or the surrounding public realm do not suffer a loss of amenity by reason of harmful glare 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.

Prior to the fit out of any of the commercial premises, an independently verified BREEAM report (detailing performance in each category, overall score, BREEAM rating and a BREEAM certificate of building performance) to achieve a minimum "Excellent' rating shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any such approval given. Before the first occupation of the building hereby permitted, a certified Post Construction Review (or other verification process agreed with the local planning authority) shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed standards at (a) have been met.

Reason:

To ensure the proposal complies with The National Planning Policy Framework 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.

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

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

Prior to the commencement of any landscaping works, 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 access, terraces, or pathways layouts, materials and edge details), shall be submitted to and approved in writing by the Local Planning Authority. The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use. The planting, seeding and/or turfing shall be carried out in the first planting season following completion of building works and any trees or shrubs that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the same size and species in the first suitable planting season. Planting shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction and BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf).

Reason:

So that the Council may be satisfied with the details of the landscaping scheme in accordance with The National Planning Policy Framework 2019 Chapters 8, 12, 15 & 16 and policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of The Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity.

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 light industrial purposes will be fitted-out to an appropriate level for 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 not withstanding 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 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 Strategic Policy 1.2 Strategic and local preferred industrial locations of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan 2007 and the National Planning Policy Framework 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.

24 Before the first occupation of the building hereby permitted, details of the arrangements for the

storing of domestic and commercial refuse shall be submitted to and approved in writing by the Local Planning Authority and the facilities approved shall be provided and made available for use by the occupiers. The facilities shall thereafter be retained and shall not be used or the space used for any other purpose.

Reason:

To ensure that the refuse will be appropriately stored within the site thereby protecting the amenity of the site and the area in general from litter, odour and potential vermin/pest nuisance in accordance with The National Planning Policy Framework 2019, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity and Policy 3.7 Waste Reduction of The Southwark Plan 2007

Before the first occupation of the building hereby permitted, a landscape management plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas (except privately owned domestic gardens), shall be submitted to an approved in writing by the Local Planning Authority. The landscape management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

Reason:

This condition is necessary to ensure the protection of wildlife and supporting habitat and secure opportunities for the enhancement of the nature conservation value of the site. This is a mandatory criterion of BREEAM (LE5) to monitor long term impact on biodiversity, a requirement is to produce a Landscape and Habitat Management Plan.

No properties shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows to serve the development have been completed; or - a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.

Reason: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development

Before the first occupation of the development hereby permitted, the applicant shall submit details of all the play spaces proposed and details of the play equipment to be installed on the site, including 1:50 scale detailed drawings for approval by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with any such approval given and retained as such. 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.

Reason:

In order that the Council may be satisfied with the details of the play strategy, in accordance with The National Planning Policy Framework 2019 Parts 5, 8, and 12, London Plan (2016)

Policy 3.6 Children and young people's play and informal recreation facilities; policies SP11 Open spaces and wildlife and SP12 Design and conservation of The Core Strategy 2011 and the following Saved Policies of The Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design; and 4.2 Quality of residential accommodation

As the site is at residual risk from the River Thames, a stand alone Flood Warning and Emergency Evacuation Plan should be submitted to Southwark's Emergency Planning department for their approval prior to occupation of the site. The plan should state how occupants will be made aware that they can sign up to the Environment Agency Flood Warning services, and of the plan itself. It should also provide details of how residents should respond in the event that they receive a flood warning, or become aware of a flood.

Reason: To minimise the risk of flooding in accordance with the Southwark Strategic Flood Risk Assessment (2017)

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.

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

Reason:

In order to ensure that no additional plant is placed on the roof of the building in the interest of the appearance and design of the building and the visual amenity of the area in accordance with The National Planning Policy Framework 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.

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

Bedrooms - 35dB LAeg T+, 30 dB L Aeg 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 a relevant sample of premises. 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 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.

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.

A validation test shall be carried out and the results submitted to the Local Planning Authority for approval in writing to demonstrate compliance with the above standard. Once approved the plant and any acoustic treatments shall be permanently maintained thereafter.

Reason

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the National Planning Policy Framework 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).

Party walls, floors and ceilings between the commercial premises and residential dwellings shall be designed to achieve a minimum weighted standardized level difference of 60dB DnTw+Ctr. Pre-occupation testing of the separating partition shall be undertaken for airborne sound insulation in accordance with the methodology of ISO 16283-1:2014. Details of the specification of the partition together with full results of the sound transmission testing shall be submitted to the Local Planning Authority for written approval prior to the use commencing and once approved the partition shall be permanently maintained thereafter.

Reason

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities within the commercial premises accordance with strategic policy 13 'High environmental standards' of the Core Strategy (2011), saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007) and the National Planning Policy Framework 2019.

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason:

The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure.

34 Any deliveries, unloading and loading to the commercial units shall only be between the following hours:

08.00 to 20.00hrs on Monday to Saturdays; and

10.00 to 16.00hrs on Sundays and Bank Holidays.

Reason:

To ensure that and occupiers of the development and occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance in accordance with The National Planning Policy Framework 2019, Strategic Policy 13 High Environmental Standards of the Core Strategy 201 and Saved Policies 3.2 Protection of Amenity of The Southwark Plan 2007.

35 The commercial units (for light industrial use) shall not be used except during the hours of 07.00 - 23.00 on any day.

Reason:

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities within the commercial premises accordance with strategic policy 13 'High environmental standards' of the Core Strategy (2011), saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007) and the National Planning Policy Framework 2019.

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 ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants. This is in line with the National Planning Policy Framework (NPPF) (Paragraph 170). Infiltrating water has the potential to cause remobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of groundwater.

The development hereby permitted shall be constructed to include the energy efficiency measures stated in the Energy Strategy Revision 4 prepared by JAW dated April 2020 and 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 the National Planning Policy Framework 2019, Strategic Policy 13 High Environmental Standards of the Core Strategy and Policy 5.7 Renewable Energy of the London Plan 2016.

Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 and any associated provisions of the Town and Country Planning General Permitted Development Order 2015 (including any future amendment or enactment of those Orders), the Class B use hereby permitted shall be B1(c) light industrial processes and no other use as detailed in the 3019_GA-SP-L00 REV P5 – GROUND FLOOR PLAN; 3019_GA-SP-L01 REV P4 – FIRST FLOOR PLAN; 3019_GA-P-A-L00 REV P5 – GROUND FLOOR PLAN; 3019_GA-P-A-L01 REV P5 – FIRST FLOOR PLAN; 3019_GA-P-B-L00 REV P5 – GROUND FLOOR PLAN: 3019 GA-P-B-L01 REV P5 – FIRST FLOOR PLAN

Reason:

In granting this permission the Local Planning Authority has had regard to the special circumstances of this case in accordance with Strategic Policy 1.2 Strategic and local preferred industrial locations of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan 2007 and the National Planning Policy Framework 2019.

Informative notes to the applicant relating to the proposed development

SOUTHWARK ECOLOGIST

1. Lighting used in the proposed development should, where possible during the construction and operation phases of the development, be designed to avoid impacting the railway embankments and bridges to the east of the site in order to minimise disturbance to bats which may opportunistically use these linear features for commuting to foraging habitat in the wider area. Sensitive lighting could include installation of bollard lighting, use of warm-white LED lighting, directional installation of lighting, installation of recessed external lighting, and as a last resort installation of hoods and cowls on lamps

MUNICIPAL YEAR 2020-21

OPEN COMMITTEE: NOTE:

PLANNING COMMITTEE
Original held in Constitutional Team; all amendments/queries to Tim Murtagh, Constitutional Team,
Email – tim.murtagh@southwark.gov.uk

OPEN

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