

Planning Committee

Wednesday 2 February 2022

6.30 pm

Ground floor meeting room, G01 - 160 Tooley Street,
London SE1 2QH

Membership

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

Reserves

Councillor Radha Burgess
Councillor Victor Chamberlain
Councillor Jon Hartley
Councillor Nick Johnson
Councillor Eleanor Kerslake
Councillor James McAsh
Councillor Victoria Mills
Councillor Margy Newens

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

Gerald Gohler, Constitutional Officer on Email: Gerald.gohler@southwark.gov.uk

Members of the committee are summoned to attend this meeting

Eleanor Kelly

Chief Executive

Date: 25 January 2022



Planning Committee

Wednesday 2 February 2022

6.30 pm

Ground floor meeting room, G02 - 160 Tooley Street, London SE1 2QH

Order of Business

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PART A - OPEN BUSINESS

PROCEDURE NOTE

1. APOLOGIES

To receive any apologies for absence.

2. CONFIRMATION OF VOTING MEMBERS

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

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

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

4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

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

5. MINUTES

To approve as a correct record the Minutes of the meeting held on 18 January 2022. (To follow)

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6.	DEVELOPMENT MANAGEMENT	3 - 7
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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.”

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

Date: 25 January 2022



Planning Committee

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

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

- (a) One representative (spokesperson) for any objectors. If there is more than one objector wishing to speak, the time is then divided within the 3-minute time slot.
- (b) The applicant or applicant's agent.
- (c) One representative for any supporters (who live within 100 metres of the development site).
- (d) Ward councillor (spokesperson) from where the proposal is located.
- (e) The members of the committee will then debate the application and consider the recommendation.

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

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

issues need to be clarified later in the proceedings; it is **not** an opportunity to take part in the debate of the committee.

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

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

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

Planning Committee Clerk, Constitutional Team
Finance and Governance
ConsTeam@southwark.gov.uk

Item No. 6	Classification: Open	Date: 2 February 2022	Meeting Name: Planning Committee
Report title:		Development Management	
Ward(s) or groups affected:		All	
From:		Proper Constitutional Officer	

RECOMMENDATIONS

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

BACKGROUND INFORMATION

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

KEY ISSUES FOR CONSIDERATION

5. In respect of the attached planning committee items members are asked, where appropriate:
 - a. To determine those applications in respect of site(s) within the borough, subject where applicable, to the consent of the Secretary of State for 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 Governance

12. A resolution to grant planning permission shall mean that the director of planning and growth 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 and growth 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 and growth 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 governance, and which is satisfactory to the director of planning and growth. 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 governance. 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

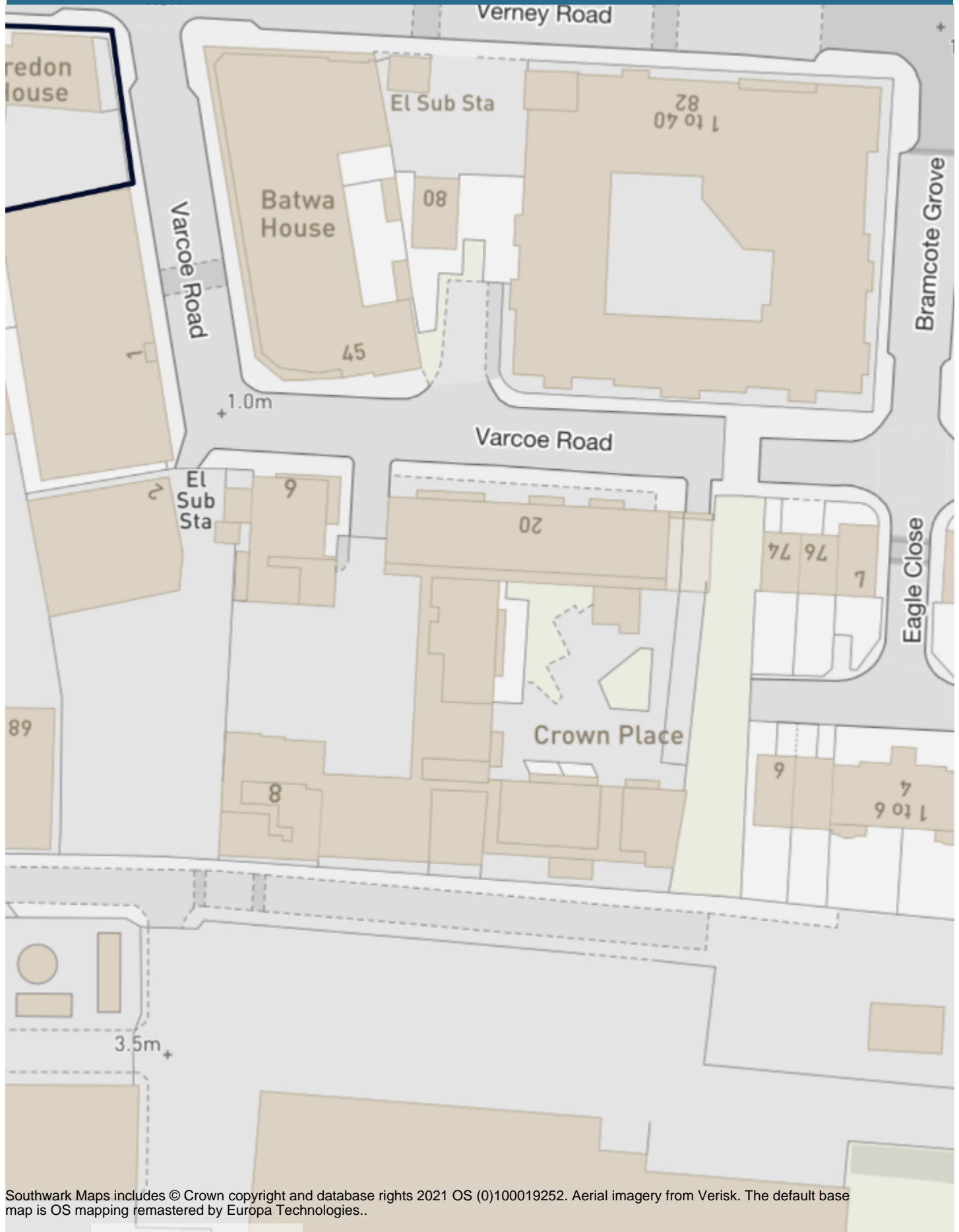
Lead Officer	Chidilim Agada, Head of Constitutional Services		
Report Author	Gerald Gohler, Constitutional Officer Jonathan Gorst, Head of Regeneration and Development		
Version	Final		
Dated	24 January 2022		
Key Decision?	No		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title		Comments sought	Comments included
Director of Law and Governance		Yes	Yes
Director of Planning and Growth		No	No
Cabinet Member		No	No
Date final report sent to Constitutional Team			24 January 2022

Agenda Item 6.1



21/AP/3247

Credon House Verney Road London se16 3ba



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20-Jan-2022

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Item No. 6.1	Classification: Open	Date: 2 February 2022	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 21/AP/3247 for: FULL PLANNING APPLICATION Address: CREDON HOUSE, VERNEY ROAD, LONDON SE16 3BA Proposal: Demolition of existing building and construction of a nine storey building (32.30m AOD) comprising up to 82sqm of Class E floorspace at ground floor and up to 22 homes (Class C3). Provision of ancillary plant, amenity spaces, cycles and refuse 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 AND GROWTH		
Application Start Date	14/09/2021	Application Expiry Date	14/12/2021
Earliest Decision Date	10/11/2021		

RECOMMENDATIONS

1. 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 2 August 2022.
2. In the event that the requirements of 1 are not met by 2 August 2022 that the Director of Planning and Growth be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 228 of this report.

EXECUTIVE SUMMARY

Housing:

Homes	Social Rent Homes	Intermediate Homes	Market Rent Homes	Homes Total (% of total)	HR Total
1 bed	8	0	0	0	36.36%
2 bed	7	0	0	0	31.82%
3 bed	7	0	0	0	31.82%
Total (% of total)	22 (100% social rent)	0	0	0	79

Credon House and Ossory Road Combined Affordable Housing Offer (by unit):

Unit Size	Market Units Ossory Road	Intermediate Housing Ossory Road	Social Rent Credon House	Total
1 bed	78	39	8	125
2 bed	0	0	7	7
3 bed	0	0	7	7
Total	78	39	22	139

Credon House and Ossory Road Combined Affordable Housing Offer (by habitable room):

	Market Units Ossory Road	Intermediate Housing Ossory Road	Social Rent Credon House	Total
Habitable Rooms (no.)	156	78	79	313
Habitable Rooms (%)	49.8%	24.9%	25.3%	100%
Total Habitable Rooms	156 (50%)	157 (50%)		313
Units (no.)	78	39	22	-
Total Units	78	61		139

Commercial:

Use Class	Existing	Proposed	Change +/-
Class E	473sqm	82sqm Affordable workspace	-391sqm
Jobs	0 - Vacant	Up to 8	+8 jobs

Parks and children's playspace:

	Existing sqm	Proposed sqm	Change +/-
Public Open Space	0	0	0
Play Space	0	117sqm	+117sqm
Communal Amenity Space	0	86sqm	+86sqm
Private Amenity Space	0	203sqm	+203sqm

Environmental:

CO2 Savings beyond part L Building Regs	71% - domestic part 66% - non-domestic parts
Trees lost	0
Trees gained	1

	Existing	Proposed	Change +/-
Urban Greening Factor	0	0.19	+0.19
Surface water run off rates	22.2 l/s	2 l/s	-20.2 l/s (90% improvement)

Green/Brown Roofs	0sqm	19.6sqm – Intensive Green roof	+19.6sqm
EVCPS (on site)	0	0	0
Cycle parking spaces	0	48	+48

CIL and S106 (Or Unilateral Undertaking):

CIL (estimated)	£502,909.06
MCIL (estimated)	£123,573.27
S106	<ul style="list-style-type: none"> • CMP monitoring - £880 • DSP monitoring - £2,200 • TfL cycle hire docking station - £1,100 • Carbon offset - £22,566 • Archaeology - £3,389 • Open space - £39,009

BACKGROUND INFORMATION

Site location and description

3. The subject site comprises 0.05 hectares and is located on the corner of Verney Road and Varcoe Road. The building was last in use as Use Class E (Office). However, under planning reference 17/AP/1859 Prior Approval was given for the change of use from Office B1a to Residential C3 Use Class to provide eight residential homes (four x 1-bed, four x 2-bed).
4. The existing building has a rectangular footprint with a stepped front elevation fronting onto Verney Road; the building is two storeys in height with additional accommodation within the roofspace in the form of a mansard roof containing a number of dormer windows. The existing building is of brick construction with timber sash windows and is of poor quality. To the rear of the building is a small car park that is accessed via Varcoe Road.
5. The application site is at a junction where the character of Verney Road transitions from commercial uses to the west to mostly residential uses to the east. Immediately to the south of the application site at 1 Varcoe Road, is a recently constructed Pocket Living development of part seven, part eight storeys in height comprising 57 affordable residential homes (Use Class C3) and flexible employment commercial / retail space at ground floor (Use Classes B1, A1- A3). A retail unit has recently occupied the space.

6. To the north of the application site are two storey terrace properties and higher density six storey flatted development to the immediate east and south-east of the site. To the west of the application site along Verney Road are light industrial uses, mostly within single storey and two storey buildings. However, this context is set to change as part of the redevelopment of the Old Kent Road Opportunity Area which aims to achieve comprehensive mixed use redevelopment of the area.
7. The subject site is located within Sub Area 3 (Sandgate Street, Verney Road and Old Kent Road South and specifically Site Allocation OKR 13) of the Old Kent Road Area Action Plan (OKR AAP). The site is designated Preferred Industrial Location (Strategic) (SPIL) as per Southwark's current Proposals Map and as a Strategic Industrial Location (SIL) as per the adopted London Plan.
8. The site is within an Urban Density Zone and an Air Quality Management Area. The site is located in Flood Zone 3 as identified by the Environment Agency. The site is not within a conservation area, nor are there any listed buildings on or within close proximity to the site. Additionally, the site is designated as being within the Bermondsey Lake Archaeological Priority Zone.
9. Transport for London's (TfL) Public Transport Accessibility Level (PTAL) provides a score of 1-6b to rate areas within London and their accessibility to public transport options. A score of 1 represents the lowest accessibility with 6b being the best locations of accessibility to public transport. The subject site is rated as 1 on the PTAL system indicating poor accessibility to public transport. It is however acknowledged that the PTAL does not take into consideration walking routes. These consist of Credon Road to Rotherhithe New Road as well as the route from Bramcote Grove to Ilderton Road. These links would be used by pedestrians to access South Bermondsey Station and would result in the station being within a seven minute walking distance of the site as well as bus route no. 1. As such, a manual PTAL assessment has been undertaken (see accompanying Transport Assessment) which indicates the site has a PTAL of 3 which demonstrates good accessibility to public transport options in the surrounding area.
10. The Bakerloo Line Extension (BLE) project is paused subject to funding. Safeguarding still remains for the future provision of the BLE.

Image: Site Plan

DETAILS OF PROPOSAL

11. Planning permission is sought for the demolition of existing building and construction of a nine storey building comprising up to 82sqm of Class E floorspace at ground floor and up to 22 homes (Class C3). Provision of ancillary plant, amenity spaces, cycles and refuse stores.
12. The subject scheme is one of two linked applications for the redevelopment of sites within the Old Kent Road. The second application scheme is 2-10 Ossory Road, (reference 21/AP/3246) which involves the construction of a part one, part ten, and part eleven storey building comprising 117no. one bedroom homes (39 affordable Pocket homes) with 421sqm of light industrial (Class E) floorspace at ground floor level together with private and communal amenity space, two residential cycle stores, commercial cycle parking and associated plant rooms. The two applications are linked as this scheme will deliver the social rented component of the two applications when considered holistically, based on a provision of 50% affordable housing by habitable room across both sites. Overall, the two linked schemes will deliver 139 homes of which 22 (25% by habitable room) will be social rent tenure and 39 (a further 25% by habitable room) will be intermediate tenure.
13. Children's playspace within the scheme is to be located on the ground level comprising of 117sqm. The playspace has been located at ground floor to make it easily accessible by all residents via a gate from Verney Road, an access door leading directly from the ground floor lifts, and a door leading directly from the residential stair-core. Communal amenity is proposed on the eighth floor terrace that will provide 86sqm with the added benefit of the communal amenity space being south facing to maximise natural daylight into the area.

14. Cycle Parking will be provided in accordance with the London Plan and New Southwark Plan requirements. 42 secure cycle parking spaces are proposed for future residents of the development, located at ground floor (including two spaces for larger bikes), along with two long stay spaces within the affordable workspace unit for employees. In addition to this, two Sheffield stands are proposed externally within the residential entrance which will provide a total of four visitor parking spaces. The proposed development is to be car-free and occupants of the development who are Blue Badge holders would be eligible for a Residents Parking Permit.
15. Refuse and recycling facilities will be provided at ground floor level with capacity to store four 1100L Eurobins, one 660L bin and additional space for bulk storage. The commercial unit will be provided with sufficient space for two 660L bins. As the development encompasses almost the entirety of the land parcel, no public realm improvements are proposed; however, the commercial unit on the ground floor will enhance the active frontages to Verney Road
16. 22 residential units are proposed comprising of a mix of; eight one-bedroom units, seven two-bedroom units and seven three bedroom units (Use Class C3). There are no single aspect units within the scheme with the majority of units being dual aspect, and some units benefitting from being triple aspect. Residents will access the units from an entrance lobby on Verney Road. Two lifts are provided to ensure that the building continues to be fully accessible in the event of one lift breaking. Additionally, a staircase is located to the southern end of the ground floor for access to the upper floors.
17. The development proposes 82sqm of affordable workspace located on the ground floor. Given that the existing office use on site has been vacant for a number of years, the scheme would therefore constitute uplift in commercial floorspace when compared to the emerging site allocation. The intention of the proposed affordable workspace is to provide flexible workspace which would be attractive to a range of local Small or medium enterprise businesses. This use could potentially include light industrial should there be demand from a future occupier or could comprise studio or retail space. A fit out of the space will be secured by condition.

Table: Proposed land uses

Land Use	Use Class	GIA
Residential	C3	2,432sqm
Flexible Unit	E	82sqm

Revisions and amendments

18. Whilst no design or alterations to the total number of residential units has occurred during the lifespan of this application, additional information regarding some areas of assessment was submitted. The documents were submitted in light of comments received from consultee comments. In acknowledging the further documents, the nature of the information received re-consultation of the scheme was not required.
19. The documents of additional information submitted during the course of this application were as follows:
 - Flood Risk – Response to Planning Comments (dated 11/01/2022, dated rev. P2)

KEY ISSUES FOR CONSIDERATION

Summary of main issues

20. 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 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

21. 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 2021, the Core Strategy 2011, and the Saved Southwark Plan 2007.

22. 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

23. 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.
24. 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.
25. Travellers are a group with protected characteristics. The closest Travellers site to the proposed development is located close to the junction with Rotherhithe New Road and Ilderton Road. The distance between the Travellers site and the subject site is circa 290 metres to northeast. Given the sufficient separation distance it is therefore considered that no adverse impacts would occur to this group.

Other equality impacts

26. 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.

27. The proposed development would also generate additional opportunities for local employment. The proposed development would deliver 82sqm (GIA) of E Use Class floor space on the ground floor resulting in an uplift of 82sqm on the existing provision. Furthermore, the 82sqm proposed would be Affordable Workspace which will be secured through the S106 Agreement.

Conclusion on equality impacts

28. 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 proposed development incorporating a mixed use scheme of residential units in C3 Use Class to the upper floors, and a flexible use unit in E Class to the ground floor. 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.
29. 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

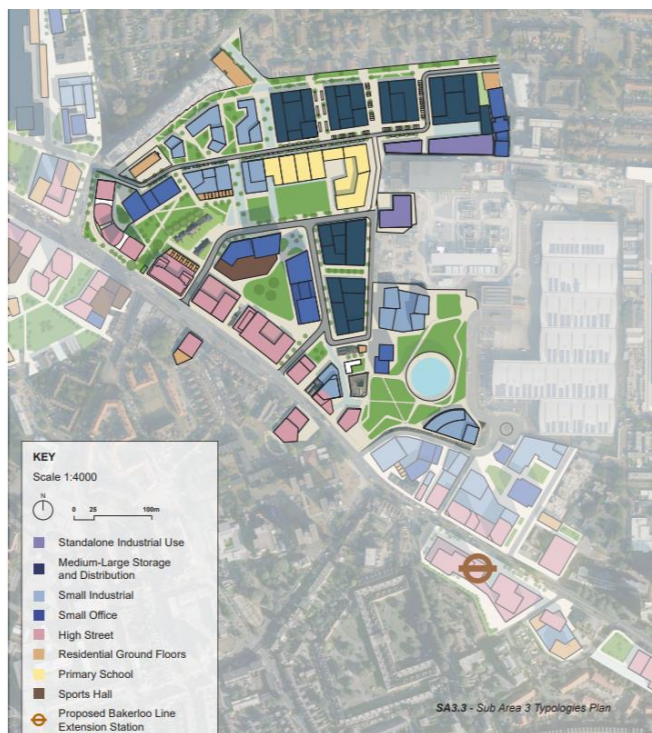
30. Paragraph 141(a) of the NPPF promotes making effective use of underutilised land, especially where this would help meet an identified need for housing. This has been incorporated into adopted policy as set out in Policy GG2 of the London Plan which seeks to prioritise the development of Opportunity Areas and sites which are well-connected by existing or planned Tube and rail stations and small sites. 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.
31. In the draft OKR AAP, the site is identified as falling within Sub Area 3 and Proposal Site OKR13. The draft site allocation states that redevelopment on this site must:
- Provide new homes
 - Provide the same amount of employment floorspace currently on the site and provide a range of employment spaces

32. The existing use on site is not considered to maximise the potential of this Opportunity Area Proposal Site. The proposed re-development of the site would introduce a mixed use building comprising of a flexible workspace unit (Use Class E) on the ground floor and C3 residential Use Class to the upper floors. It is anticipated that the scheme would deliver major regeneration benefits that are further discussed in the proceeding parts of this report.

Image: Sub Area 3 focused on OKR 13 with subject site outlined in blue



Image: Typologies map of OKR 13



Industrial land

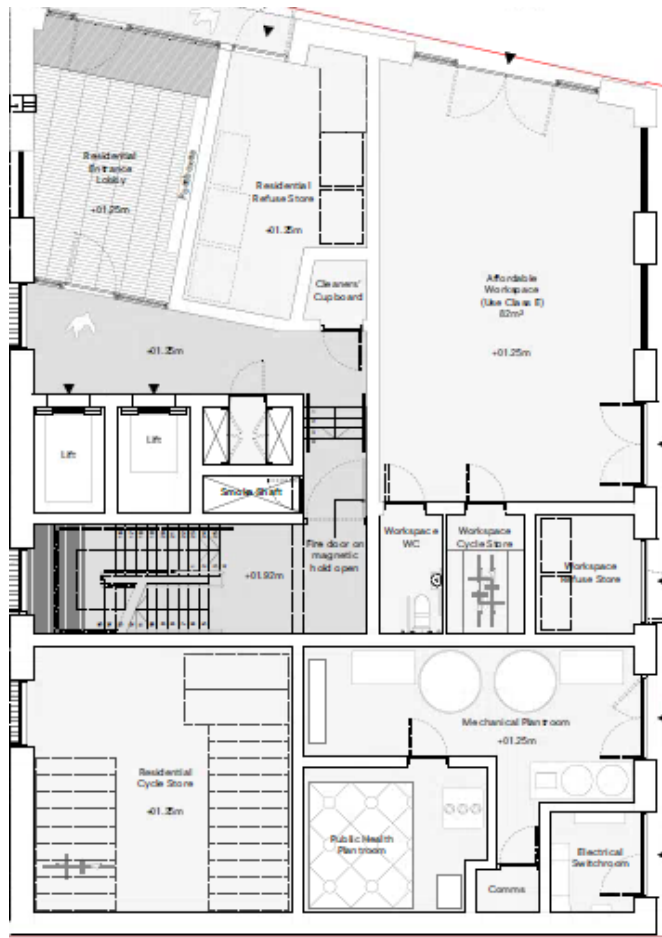
33. The site is designated as Preferred Industrial Location-Strategic (OKRAAP) and Strategic Industrial Land (SIL) in current adopted Policy. Strategic Policy 10 of the Core Strategy states that SIL will be protected for industrial and warehousing uses. Saved Southwark Plan Policy 1.2 states that the 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.
34. 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).
35. The London Plan 2021 identifies LB Southwark as a borough which should retain industrial capacity, Policy E5 states development proposals for uses in SILs other than industrial and related functions (including residential development, retail, places of worship, leisure and assembly uses), should be refused except in areas released through a strategically co-ordinated process of SIL consolidation.
36. The Old Kent Road was designated as an Opportunity Area through the previous iteration of the London Plan, with an indicative capacity of 1,000 new jobs and a minimum of 2,500 new homes. However, this has been increased to an indicative capacity of 12,000 homes in the New London Plan (2021). The London Plan notes that the emerging OKR AAP should *“set out how industrial land can be intensified and provide space for businesses that need to relocate from any SIL identified for release. Areas that are released from SIL should seek to co-locate housing with industrial uses, or a wider range of commercial uses”*.
37. 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.
38. Paragraph 48 of the NPPF (2021) 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. Whilst the OKR AAP and NSP remain in draft form, these are at an advanced stage in the adoption process, with the NSP being adopted in February 2022. Therefore, in accordance with paragraph 48 of the NPPF, the NSP and the de-allocation of the site as SIL is a material planning consideration and holds very significant weight in the decision-making process.

39. The subject site is allocated within the emerging New Southwark Plan as part of Site Allocation NSP 68 which allocates the site as part of a wider regeneration area. Site allocation NSP 68 (Sandgate Street and Verney Road) seeks a comprehensive mixed-use redevelopment of the site to include the delivery of new homes alongside the delivery of new homes, retail, community and employment uses. The image on the previous page, Typologies Map of OKR 13, identifies the building uses for OKR 13. The subject site is identified as suitable for residential use and would be acceptable with residential at the ground floor level. This highlights that for this part of OKR13 the industrial character is reduced, and the proposed land uses reflect the prevailing character of Varcoe Road and Verney Road to the east which is residential in nature.
40. Given the above, whilst the proposed development is currently located on SIL, given the co-ordinated masterplanning approach to the managed release of industrial land set out above, the proposed land uses are considered wholly appropriate in strategic planning terms and comply with both London Plan and Local Plan policies. It is therefore considered that the departure of the subject site from SIL designation is acceptable.

Employment re-provision

41. Although the site is currently designated as Strategic Industrial Location (SIL), it has been in long term use as offices (Class E), and its historic use was residential. The previous office use ceased a number of years ago and since this time the building has been vacant with the exception of occupation by live in guardians. As such, although the site is currently designated as SIL as part of a wider area, the proposed redevelopment would not result in the loss of industrial use or floorspace as the subject site has never been in an industrial use.
42. Despite the above, to enhance the vitality and viability of this site the application proposes 82sqm of employment floorspace at street level which would be in keeping with the ground floor uses coming forward at 1 Varcoe Road and will provide a significant public benefit.

Image: Ground floor layout demonstrating the layout of the flexible unit



Job creation

43. The existing building on site was previously in use as an office but has been vacant for a number of years and therefore currently offers no employment opportunities. The flexible affordable workspace unit proposed could provide capacity for up to eight employees for a workspace use based on official employment yield contained within the Homes & Communities Agency (2015) Employment Density Guide. This would therefore result in uplift in employment opportunities for local people when compared to the existing situation. The Council's Local Economy Team (LET) has been consulted and raised no objection given that the scheme does not reach the thresholds to trigger employment obligations.

Affordable workspace

44. 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. As mentioned previously in this report, this application is linked to another scheme being brought forward by the Applicant at 2-10 Ossory Road (planning ref:

21/AP/3247). Combined the two sites would provide 503sqm of commercial floorspace. Individually the schemes do not meet the 500sqm threshold; however, as a gesture for supporting affordable workspace provision, the 82sqm provided within this development forms the affordable workspace proposed for the linked schemes.

Provision of housing, including affordable housing

45. The scheme would deliver 22 new homes, of which all would be affordable housing, provided as social rent. As mentioned in paragraph 12 of this report, this application is linked to another scheme being brought forward by the Applicant at 2-10 Ossory Road (planning ref: 21/AP/3246) which will provide intermediate and market housing. Between the two sites, the Applicant will deliver a total of 139 new homes, of which 50% will comprise affordable housing by habitable room (61 homes). The subject scheme will deliver solely social rented accommodation, with intermediate and market housing being provided at 2-10 Ossory Road. The affordable housing provision is a positive aspect of the scheme and far exceeds the minimum of 35% as required by Draft OKR AAP Policy 4.

Prematurity

46. Legal Advice received in relation to this issue highlights the following from the National Planning Policy Guidance:

“arguments that an application is premature are unlikely to justify a refusal of planning permission other than where it is clear that the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, taking the policies in the Framework and any other material considerations into account. Such circumstances are likely, but not exclusively, to be limited to situations where both:

- a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging Local Plan or neighbourhood planning; and
 - b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.
47. 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.”

48. The most up to date adopted development plan document pertinent to the Old Kent Road is the 2021 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 its previous iteration London Plan 2016) and has also sought to address the increased housing target for the opportunity area and the need to ensure that the 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 2021 London Plan and the direction of travel of the draft NSP, and the 2017 and 2020 draft OKR AAPs. It is not therefore considered to be premature.

Conclusion on land use

49. The scheme would deliver major regeneration benefits, including a significant contribution to the borough's housing stock, 100% affordable housing, job creation, and the introduction of a mixed use ground floor commercial space to the development. It is therefore considered that the development, in land use terms, is acceptable, and its contribution to Site Allocation 13 and the surrounding Old Kent Road Opportunity Area (OKROA) should be supported.

Affordable housing and development viability

Affordable Housing

50. National, regional and local planning policies place a high priority on the delivery of affordable housing as part of the plan led approach to addressing the housing crisis. Southwark's Strategic Housing Market Assessment (SHMA) identifies a need for 2,077 social rented and intermediate homes per annum which is approximately 71% of Southwark's total housing need. The SHMA suggests that approximately 78% of the total affordable housing need is for intermediate housing to meet the housing needs of lower and middle income residents. However, the most acute 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.
51. The regional policies relating to affordable housing are set out in the London Plan 2021, with the three key policies being H4, H5 and H6. These should be applied having regard to the Mayor's 'Housing' and 'Affordable Housing and Viability' SPGs. Policy H4 requires development to deliver the maximum reasonable amount of affordable housing, with the Mayor setting a strategic target of 50%. Policy H6 also prescribes the tenure split of affordable housing. It requires:
- at least 30% to be low-cost rent (social rent or London Affordable Rent);
 - at least 30% to be intermediate (with London Living Rent and shared ownership being the default tenures); and

- the remaining 40% to be determined by the borough as low-cost rented homes or intermediate tenure(s) based on identified local need.
52. The relevant adopted local policies are Saved Policy 4.4 of the Southwark Plan 2007 and Strategic Policy 6 of the Core Strategy 2011. Further guidance on how to implement the policies is contained within the Council's adopted Affordable Housing SPD 2008 and draft Affordable Housing SPD 2011.
 53. Strategic Policy 6 requires as much "affordable housing on developments of 10 or more units as is financially viable". It also sets the lower threshold, requiring at least 35% of the residential units within new developments of ten or more dwellings to be affordable subject to viability. Draft policy 4 of the OKR AAP also requires a minimum of 35% of new residential developments to be affordable, and has an ambitious target of 7,000 additional affordable homes in the Opportunity Area between 2017- 2037.
 54. Emerging local policy P1 of the NSP, to which weight can be given, requires developments of ten or more homes to deliver the maximum viable number of dwellings in an affordable tenure, setting a minimum threshold of 35%. A minimum of 25% of the total housing should be social rent, and a minimum 10% as intermediate, calculated on a habitable room basis. These requirements derive from the Council's Strategic Housing Market Assessment, which identifies a pressing need for social rented and intermediate homes in Southwark.

Development viability

55. As mentioned in paragraph 53 above, London Plan Policy H4 sets a strategic target of 50% affordable housing onsite. The policy sets out parameters for fast track routes which will not require a viability assessment and stipulates that fast track applications will be subject to review mechanisms if development is not commenced within two years. The fast track approach is also reflected in NSP policies.
56. NSP Policy P1 states that where development that provides 40% social rented and intermediate housing affordable housing, with a policy compliant tenure mix, (a minimum of 25% social rented and a minimum of 10% intermediate housing) as set out in table 1 with no grant subsidy. Where developments follow the fast track route they will not be subject to a viability appraisal. A viability appraisal will be necessary if amendments are proposed to lower the affordable housing provision to less than 40% following the grant of planning permission.
57. As mentioned in paragraphs 12 and 45 of this report, this application is linked to another scheme being brought forward by the Applicant at 2-10 Ossory Road (planning ref: 21/AP/3246) which will provide intermediate and market housing. Between the two sites, the Applicant will deliver a total of 139 new homes, of which 50% will comprise affordable housing by habitable room (61 homes). The subject scheme will deliver solely social rented accommodation, with intermediate and market housing being provided at 2-10 Ossory Road. The numerical breakdown of the affordable units across both sites would be in line with Policy H6 of the London Plan detailed in paragraph 54 of this report. Of the

Affordable housing provided between the two sites, the Credon House element would provide 50% Social rent, with the Ossory Road scheme providing 50% intermediate.

58. Given the assessment above, the application is compliant with policy and therefore does not require a viability assessment to be submitted with the application.

Conclusion on affordable housing

59. In conclusion, this site and the site at Ossory Road that do not benefit from public subsidy, provide a combined affordable housing offer of 50% that exceeds local and London-level policy requirements, and benefits from the NSP policy P1 fast track. The delivery of social rent, and intermediate units is a very positive aspect of the proposals. In line with section E of London Plan Policy H5, to ensure the applicant fully intends to build out the permissions, the requirement for an Early Stage Viability Review will be triggered if an agreed level of progress on implementation is not made within two years of the permission being granted. This will be secured through the S106 Agreement.

Design considerations

60. Strategic Policy 12 of the Southwark Core Strategy (2011) states that all development in the borough will be expected to “achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in.” Saved Policy 3.12 ‘Quality in design’ of the Southwark Plan asserts that developments should achieve a high quality of both architectural and urban design, enhancing the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit. Saved Policy 3.13 of the Southwark Plan asserts that the principles of good urban design must be taken into account in all developments. This includes height, scale and massing of buildings, consideration of the local context, its character and townscape as well as the local views and resultant streetscape. With specific reference to tall buildings, Policy D9 of the London Plan (2021), ‘Tall 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.
61. 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 a series of tests for tall buildings (defined as significantly taller than surrounding buildings or their context). It also states that the highest tall buildings will be located in areas where there is the greatest opportunity for regeneration, including Opportunity Areas, such as The Old Kent Road Opportunity Area.

Site layout

62. The building occupies the entire corner site at the junction of Varcoe Road and Verney Road and has been designed to fit with the context of the adjacent completed Pocket Homes scheme, both in terms of scale and architectural detailing. The residential entrance is well-lit and recessed with a decorative concrete cornice and concrete lintel. Large format glazing to the lobby allows for clear sight-lines through to the lifts which assists with safety for residents and visitors. The entrance foyer has full height glazing in addition to full height openings directly onto the courtyard/playspace that enables the light to enter deep into the plan. The staircore, centred to the building plan, is accessed from the foyer via steps adjacent to the lifts. There are two lifts, to enable there to be at least one working lift at all times. The staircore has west facing windows at every level and gives residents access to all floors. Short corridors serve two homes at first and eighth floors, and three homes from the second to seventh floors.
63. A communal courtyard with playspace has been located at ground floor and is easily accessible by all residents via a gate from Verney Road, an access door leading directly from the ground floor lifts and a door leading directly from the residential staircore. The courtyard space benefits from positive overlooking from the west-facing homes above. The cycle store is located at the rear of the courtyard whereby cyclists will not need to take cycles through the entrance lobby. The affordable workspace unit wraps the corner of the building which successfully activates the frontages of both Verney Road, and Varcoe Road. The workspace and associated cycle store are accessed from Verney Road and Varcoe Road with a refuse store accessed from Verney Road. At eighth floor, all residents have access to the communal roof terrace.

Height scale and massing (including consideration of tall buildings)

Image: The development, viewed from Credon Road



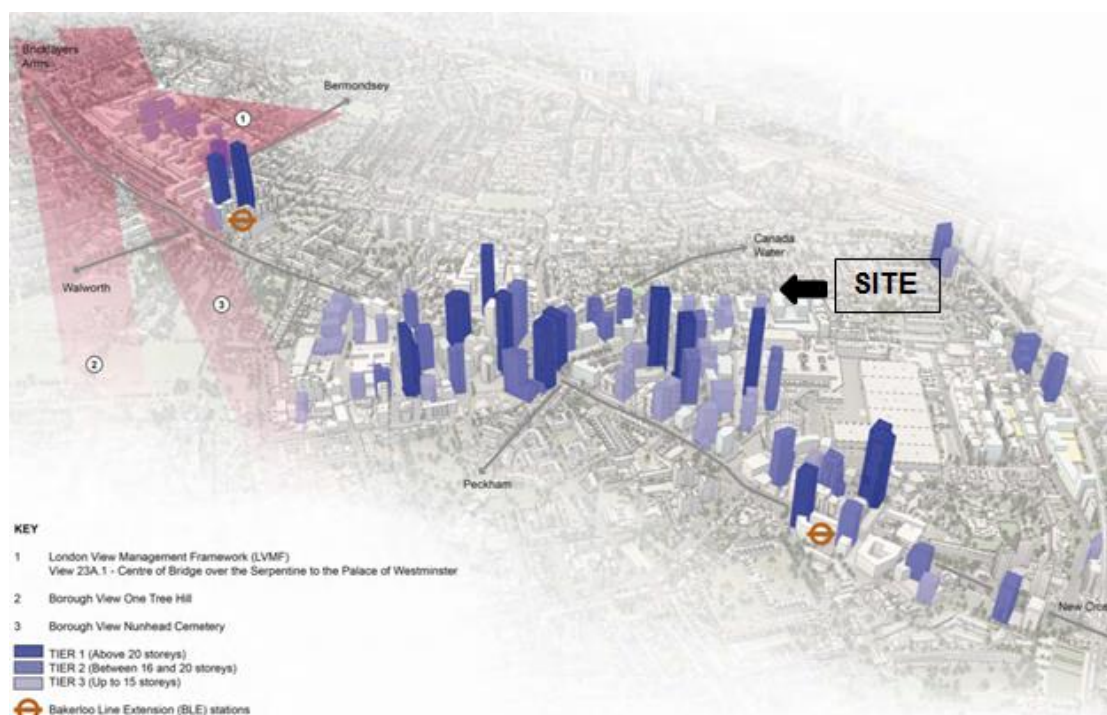
64. As the development is located on a prominent corner site the building will be visible and seen along Verney Road and Varcoe Road. The building is nine storeys in height and this enables it to hold the corner in townscape terms. To enable the scheme to successfully integrate into the immediate area, and the overall OKROA, the elevations have been broken down into three sections; base, middle, top, which repeats the design approach of the adjacent building.
65. At the base, large glazed openings and generous floor to ceiling heights to the ground floor frame the affordable workspace unit and the residential entrance. A white-pigmented precast concrete cornice harmonises with the adjacent Varcoe Road scheme. The bottom of the cornice extends down to become a deep lintel over to mark the residential entrance. The middle of the scheme provides a simple expression of flat brickwork with a regular grid of punched openings with deep reveals. Three rows of soldier coursing above each window, full brick deep window reveals and white-pigmented window sills add a feeling of quality to this simple expression.
66. At the upper level (top) of the scheme, the building is expressed as a series of brick piers with recessed brick panels set back 1/2 brick between the piers. The soldier coursing of the recessed panels contrasts with the stretcher bond of the piers. The brick piers bring depth to the facade and, along with the white-

pigmented precast concrete coping and window reveals, cast deep shadows on the facade. For the eighth floor terrace, the brick piers and concrete coping extend to enclose the roof terrace, creating a brick colonnade. The colonnade is important in continuing the stepped expression of the Varcoe Road development adjacent. These details will all be secured by condition.

Draft OKR AAP

67. Policy 8 of the draft OKRAAP 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 (between 16 and 20 storeys) will mark places of local importance to help define their character and assist wayfinding.
68. 'Tier Three' tall buildings (up to 15 storeys) will act as markers within the neighbourhood. At appropriate corners and junctions, or in relation to important land uses, they will emerge from the lower buildings that enclose the streets and open spaces. Buildings that are not defined within the three tier structure will generally be expected to be of a lower/mid-scale from three to eleven storeys depending on context. Typically they will form the shoulder height of podiums and/ or perimeter blocks defining streets within the masterplan or mediating the transition of scale on the edges of the masterplan. The majority of buildings at the edges of the masterplan are of a lower height to mediate the transition in scale between the masterplan proposals and existing residential communities.
69. The subject site is located on the northern edge of the Masterplan within Sub Area 3. Due to its location, the AAP establishes this site as being outside of the tall building tier structure. Its corner location at the edge of the masterplan allows for the development to be in the lower/mid-scale and to mediate the transition of scale and massing approaching into the central zone of Sub Area 3 where larger buildings are proposed. The draft AAP indicates a building of nine storeys in height in this location the development is therefore in line within the requirements of the draft OKR AAP.

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



London Plan (2021)

70. Policy D9 of the 2021 London Plan, 'Tall Buildings', states that '*Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan*'. Furthermore, London Plan Policy SD1 'Opportunity Areas' affirms the need to ensure that Opportunity Areas maximise the delivery of affordable housing and create mixed and inclusive communities. Table 2.1 of Policy SD1 identifies Old Kent Road as an Opportunity Area with an indicative capacity of 12,000 new homes. As such, the Old Kent Road Opportunity Area is, in principle, an appropriate location for tall buildings which optimise housing delivery and regeneration benefits. As required by the London Plan the draft AAP has set out where tall buildings will be located and how that will help deliver other aspects of the plan, this scheme complies with the draft AAP, whilst also meeting the other requirements of London Plan Policy D9 such as architectural quality, visual, and environmental impacts of tall buildings which are discussed in further detail below.
71. 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. The location of the subject site is circa 635 metres away from the nearest conservation area, and some 350 metres to the north of the nearest Grade II Listed Building, the Gasholder. The specific impact of the proposed development on this, and the wider townscape context is assessed in more detail below in the Heritage and Townscape Consideration section of this report.

72. The immediate areas of Verney Road and Varcoe Road contain a mix of residential and industrial uses with limited active frontages and poor urban streetscapes. It is considered that the current use of the existing building is not considered worthy of protection. The proposed high quality architectural mixed use scheme with a flexible ground floor unit with residential units above is a significant public benefit of the proposed development.
73. 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. In the majority of cases however, there would be no significant adverse impacts. Please see the relevant section of this report for more detail.

Southwark plan

74.
 - 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 the London Plan (2021) 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.
75. As set out in the AAP the development occupies the entire site with public realm improvements centred on improving the pedestrian experience when entering, leaving or moving past the site. The introduction of active frontages on both Varcoe and Verney Roads is considered to provide a positive contribution to the streetscape. Furthermore, given its corner location it is anticipated that the proposal would provide an urban presence and legibility given its positioning at the northern edge of Sub Area 3.
76. The development is considered to be compatible with the requirements of the draft AAP, particularly by reflecting the overall design quality of the adjoining 1 Varcoe Road development. The scale and massing of the scheme is considered to be an appropriate addition to the Old Kent Road skyline that would help to deliver the Sub Area 3 masterplan.

Architectural design and materiality

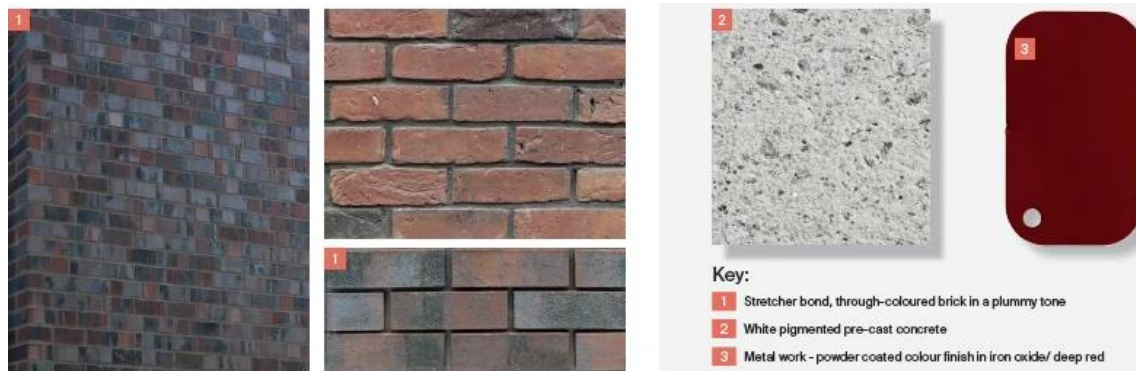
77. The OKR AAP referring to Verney Road details specific design guidance and recommendations for development. The guidance states that:

‘The design of buildings should be informed by the area’s working, industrious heritage and character, with architecture which:

- Is solid and robust in appearance, with rational proportions and articulation;
- Is predominantly finished in brick:
- Avoids using lightweight materials like glass balustrades and timber cladding.’

78. The palette consists of two masonry materials, brick with a plummy tone and white pigmented precast concrete in addition to coloured metalwork. These have been carefully selected to meet the aspirations set out in the OKR AAP. The chosen brick complements the palette of the materials found in the surrounding context, the buff London stock bricks of the warehouses on Verney Road, the industrial character of the area, and the deeper red bricks of the newer developments such as the Varcoe Road development, and Batwa House. This has been well considered in the selection of the materials to enable this development to complement the adjoining Pocket scheme on Varcoe Road.
79. The plummy brick which also has red and grey tones and areas that are lightly glazed, bringing an added feeling of quality, is considered to contrast positively with the existing red brickwork of the adjoining Varcoe Road development. Brick piers to the upper storey and full brick reveals (215mm) to the storeys below combined with the white pigmented precast concrete cornicing and window sills bring depth and an overall architectural quality to the façade. Dark mortar is considered to complement the tone of the brick to give a quality sculpted feel to the building while the white pigmented precast concrete will pick up the tone and colour of the precast elements of the adjoining development on Varcoe Road. The metalwork throughout will be finished in a deep red iron oxide colour to compliment the façade.
80. The inclusion of full brick reveals (215mm) within the development complies with the aims and objectives contained within page 67 of the OKR AAP. The depth and detailing of these features will be critical in securing the buildings design quality and these details will be secured by condition. The proposed design is well conceived and executed in combining different material finishes effectively into the exterior finish of the development. Overall, the architecture is effective and well-articulated.

Image: Materiality palette



Landscaping

81. The ground floor courtyard and playspace is accessed via a gate from Verney Road, and directly from the lift lobby and stair core. A permeable concrete paved footpath leads from the gate at the north end to the cycle store at the southern end. The playspace is surrounded by planting to provide a sense of enclosure with the perimeter wall providing good opportunity to grow climbing plants. The wider planting will include a mix of shade tolerant woodland-type plant species that will work with the constraints of lighting levels. Shrubs, perennials, groundcover and ornamental grasses will be planted at the northern end of the courtyard with pockets of planting strategically located to provide soft screening between the access gate and play area. The planting will provide year round interest with seed heads left in place during winter to provide opportunity for overwintering insects. Low level bollard lighting will be included for evening and night-time use.
82. The eighth floor terrace is south facing that will benefit from sunlight throughout the day. It is enclosed by a brick colonnade with planting beds, benches, and a picnic table. The planting comprises of shrubs, perennials, and ornamental grass that provides year round interest. A section of climbing plants are provided on a trellis structure on the eastern end of the terrace. Low level wall lighting will be included for evening use.

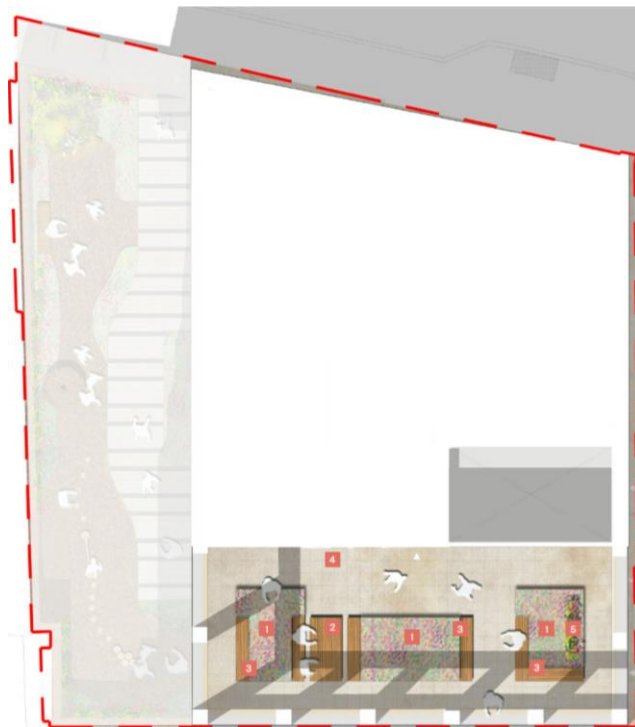
Image: Layout of ground floor courtyard/playspace and eighth floor terrace



Key:

- 1 Feature multi-stem birch tree (*Betula pendula*)
- 2 Slatted timber benches
- 3 Sunny shrub, perennial and groundcover planting mix
- 4 Shady shrub, perennial and groundcover planting mix
- 5 Timber stepping log trail and balance beam
- 6 Willow play hut
- 7 Play bark mulch
- 8 Trellis system and climbing plants to boundary wall
- 9 Low bollard lighting
- 10 Permeable concrete paving
- 11 Residential access gate from Verney Road

Image: Layout eighth floor terrace



Key:

- 1** Shrub, perennial and groundcover
- 2** Slatted timber picnic table
- 3** Raised metal planters with integrated timber benches
- 4** Concrete pavers on pedestals
- 5** 1.3m high trellis with climbing plants

83. The council's ecologist has reviewed the proposal and has identified that there is no biodiversity net gain from the development. Notwithstanding this, the Ecologist raises no objection to the development with a condition recommended that involves the inclusion of six Bat Tubes and 12 Swift Bricks. The recommended conditions are attached to the decision notice of this application.
84. The security of future residents has also been considered, with lighting arranged around the external amenity areas. The lighting is of a low level and has been strategically placed so that there are no hidden corners within the amenity spaces. A lighting strategy would be secured by condition and the metropolitan police are satisfied that this scheme could achieve Secured By Design accreditation.

Trees

85. Saved Policy 3.13 of the Southwark Plan requires high quality and appropriately designed streetscape and landscape proposals.
86. There are no trees on, or adjacent to the subject site. One new silver birch tree has been included in the development and is located at the northern end of the

courtyard space that provides a backdrop for the courtyard and playspace. The Urban Greening Factor score from the inclusion of trees and soft landscaping is 0.189. GLA Officers acknowledge that the UGF cannot be increased any further due to maximising the development on the parcel of land. As set out in the AAP this site is expected to be developed at full site coverage. Whilst the shortfall is acknowledged, it is considered that the design has adequately balanced the amount of soft landscape with the requirements for flexible and functional amenity space for residents.

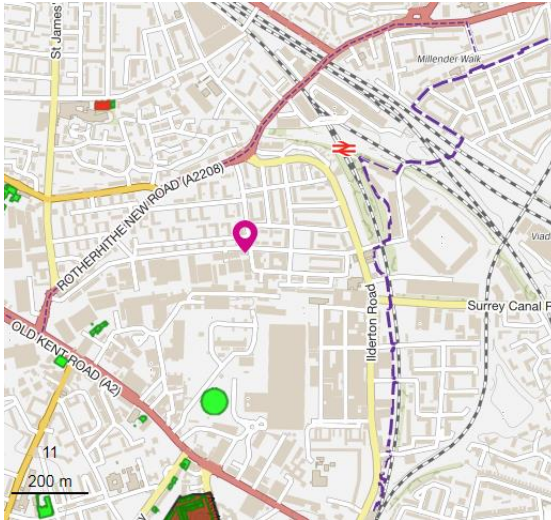
HERITAGE AND TOWNSCAPE CONSIDERATIONS

87. Policy HC1 of the London Plan 2021 advises that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural detail. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to consider the impacts of proposals upon a conservation area and its setting and to pay “special regard to the desirability of preserving or enhancing the character or appearance of that area”. Section 66 of the Act also requires the Authority to consider the impacts of a development on a listed building or its setting and to have “special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”. Para 199 of the NPPF 2021 states that ‘great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.’

Conservation areas

88. The subject site is not located within the boundaries of a conservation area, nor is it identified as a listed building. The closest conservation area is Caroline Gardens, located approximately 635 metres south of the subject site. Designated heritage assets within 500 metres of the site are limited to Grade II listed buildings and structures to the south of the site. One group of listed early 19th century terraced houses lies 400m south west of the site at Canal Grove. Gasholder no. 13 is Grade II listed and located approximately 350 metres south of the site. To the north of the subject site, the closest Grade II listed building is the former Clare College Mission Church approximately 800m from the site and built in the early twentieth century. This lies on the boundary of the Grade II Registered Southwark Park, opened in 1869.

Image: Listed buildings (green) and conservation areas (brown) located nearby; subject site is purple pin



Draft okr app and draft local list

89. Although of limited weight, the draft OKR AAP also identifies buildings and features of townscape merit and buildings of architectural or historic interest. These buildings are also included on the draft Local List published by the council in March 2018. No buildings of Townscape Merit or Locally Listed Building is located near to the development. The closest buildings of Townscape Merit identified within the OKR AAP are located in the vicinity of the Canal Grove Cottages, some 400 metres to the southwest of the subject site.

Townscape and visual impact assessment (TVIA)

90. The height of the development to the parapet is 32.30m AOD. As the subject site is not located close to any heritage asset, and sits significantly below the thresholds heights considered within the Greater London's Authority's London View Management Framework. Additionally, given the height and location of the development away from listed buildings, conservation areas and Locally Protected Southwark Views, the development is not considered to affect any heritage assets or views in the wider area and therefore a TVIA is not required for this development.

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

91. 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
Listed Buildings	No harm identified owing to the height and distance of the development from nearby assets
Draft Locally listed buildings/ undesignated assets identified in the draft Old Kent Road AAP	No harm identified.

92. In conclusion, the proposed development would not have a significant impact on the views assessed despite it being a highly visible feature in the immediate townscape. Given the substantial distance to nearby heritage assets, and taking into consideration the height of the development, the scheme is considered to be a beneficial addition to the London Skyline that would successfully integrate into the immediate area and would not cause harm to any of the heritage assets listed above.
93. Whilst limited weight has been given to emerging policy, full weight has been given to adopted policies, including the NPPF (2021), London Plan (2021) and Southwark Plan (2007) and Core Strategy (2011). 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

94. Strategic Policy 7 of the Core Strategy 'Family homes' requires developments of ten 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 4).
95. Policy H10 of the London Plan relates to housing size and mix; it seeks to guide borough and developers on unit mix within new residential developments, and states that schemes should generally consist of a range of unit sizes having

regard to robust local evidence, the requirement to deliver mixed and inclusive neighbourhoods and the range of tenures in the scheme.

96. The development would provide 22 units over mixes of one (8), two (7) and three (7) bedrooms. This is compliant with the requirements of Strategic Policy 7 and the Draft OKR AAP with 64% of the development providing two bedrooms or more, and 32% of the development offering three bedroom options.

Wheelchair Housing

97. 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 D7 requires at least 10% of new dwellings to meet Building Regulations requirement M4(3)(2)(a) 'wheelchair adaptable', with all other dwellings meeting Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. This is reiterated in emerging policy in the draft OKR AAP and the New Southwark Plan.
98. 3 units within the scheme of the proposed new homes would meet Building Regulations Part M4(3)(2)(a) 'wheelchair adaptable', which equates to 13.64% of all dwellings. The wheelchair user dwellings would be secured through the Section 106 Legal Agreement.

Density

99. There is a pressing need to optimise the use of land in London, particularly in Opportunity Areas across London. Policy AAP1 of the Old Kent Road Area Action Plan seeks to increase the delivery of homes within the Opportunity Area and to achieve this encourages high densities that would normally be expected of Central London. 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.
100. 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 residential component has a net density which equates to 468 units per hectare (1,681 habitable rooms per hectare) which exceeds the range mentioned above.
101. 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	Each of the units proposed will have storage space in compliance with the Residential Design Standards SPD. An area within the residential refuse store at ground floor level has been designated for bulk storage of larger items.
Exceed minimum privacy distances	<p>The SPD states that a minimum of 12m at the front of the building and any elevation that fronts onto a highway should be achieved, as well as a minimum distance of 21m at the rear of the building.</p> <p>As the site forms a corner plot, there are two frontages of the proposed building which front onto a highway. Both the north and east elevations of the proposed building would exceed the 12m minimum distance from any other elevation which fronts onto the highway. All windows and balconies on the western elevation are set back from the shared boundary, separated by the communal amenity space below.</p> <p>As such, the scheme exceeds the minimum privacy distances set out in the SPD.</p>
Good Sunlight and daylight standards	The Daylight and Sunlight Assessment submitted confirms that the Proposed Development achieves a very high level of compliance with the BRE recommendations in terms of internal daylight and sunlight and as such, provides a high quality of accommodation for future residents.
Exceed the minimum ceiling height of 2.3m required by building regulations	All habitable rooms (bedrooms and living / kitchen / dining rooms) will have a minimum ceiling height of 2.55m, with hallways, bathrooms and communal corridors having a minimum floor to ceiling height of 2.4m, thus exceeding the Council's minimum standards.
Exceed amenity space standards (both private and communal)	Private amenity space will be provided for every home in the form of an external balcony. Communal amenity space is provided at both

	<p>ground and eighth floor levels, including play space within the ground floor garden. The proposed balconies range between 7 and 10sqm. Southwark have higher amenity space standards than what is stated in the London Plan. Southwark requires 10sqm of private amenity per unit which amounts to a requirement for 220sqm of private amenity within the development, and 50sqm of communal amenity. The scheme provides 203sqm of private amenity and 208sqm of communal amenity and playspace that amounts to a surplus of amenity space for future residents, but a shortfall in playspace on-site.</p> <p>The Application Site is within close walking distance to two parks (2 minute walk to Bramcote Park (which contains a range of play spaces) and a 10-minute walk to Southwark Park), which both provide a large amount of high-quality external amenity space which can be enjoyed by future occupants of the proposed development.</p>
Secured by Design Certification	Detailed pre-application discussions have taken place with a Metropolitan Police Designing Out Crime Officer to ensure the proposed development achieves the principles of Secure by Design. Conditions recommended by the MET Officer have been attached to this decision.
No more the 5% studio flats	The development proposes no studio flats.
Maximise the potential of the site	The potential of the site has been maximised by providing a substantial contribution to the affordable housing target for the area as well as the provision of 82sqm of affordable workspace. The scheme makes efficient use of land in accordance with the NPPF and contributes to the regeneration of the Old Kent Road Opportunity Area.
A minimum of 10% of units are suitable for wheelchair users	The development provides three wheelchair adaptable dwellings which meet M4(3)(2)(a) wheelchair adaptable with all remaining home

Excellent accessibility within buildings	<p>being M4(2) 'accessible and adaptable dwellings'. This exceeds the 10% minimum requirement of wheelchair user dwellings.</p> <p>The Application Scheme has been designed to provide excellent accessibility to all, including the residential and commercial spaces, and communal amenity space. The scheme will include two lifts, both of which access all levels of the development and communal roof terrace, thus ensuring the building will remain fully accessible in the event of one lift being out of service. All thresholds to the homes and communal amenity spaces will be level.</p>
Exceptional environmental performance	The Application Scheme will achieve an on-site 71% carbon dioxide reduction for the residential element of the scheme, and a 66% carbon reduction for the commercial element, which significantly exceeds the minimum 35% reduction set out in the London Plan.
Minimise noise nuisance between flats, through vertical stacking of similar room types	The stacking of homes has been maximised across the residential element of the proposed scheme as much as possible, with balconies in the same position across floors and the same typical floor plan across levels 03 - 07.
Make a positive contribution to local context, character and communities	<p>The development will make a positive contribution to the local context in delivering a well-designed building on this prominent corner plot. High quality materials have been chosen which reflect and complement surrounding buildings. The design of the proposed building has taken design cues from the existing and emerging character and context of the subject site.</p> <p>The scheme will provide great regeneration benefits including substantial level of affordable housing and affordable workspace, providing activation at street level, within the OKR Opportunity Area.</p>
Include a predominance of dual aspect units	100% of homes proposed within this development are either dual or triple aspect.
Have natural light and ventilation in all	All homes will be fitted with large windows to maximise the amount of light received by each home. Each bedroom within the development

kitchens and bathrooms	<p>will have a window allowing for natural light and ventilation. Open plan kitchen / living rooms will be fitted with opening windows to maximise air flow and natural light entering the space.</p> <p>All homes will be either dual or triple aspect to provide a high-quality internal environment and allow cross-ventilation through the apartments.</p>
At least 60% of homes contain two or more bedrooms	The proposed development includes 14 homes which have 2+ bedrooms, in excess of the 60% policy requirement (64% provision). Furthermore, over 25% of the homes will be family homes as required by the NSP (32% provision).
Significantly exceed minimum floor space standards	The proposed homes have been designed with a highly efficient internal layout and space. All homes will meet or exceed the minimum internal floor area the relevant unit sizes.
Minimise corridor lengths by having an increased number of cores	Although only one core will be provided through the building, there is only a maximum of three homes served by the core on each floor.
No more than eight units per core	As mentioned above, the development has a maximum of three units per core.
Achieve exemplary architectural design	The architectural design proposed for the buildings is of the exemplary standard

Quality of residential accommodation

102. 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

103. 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).

104. All proposed homes would exceed the minimum standard of one, two and three bedroom units in accordance with the minimum space standards as per Table 3.1 of Policy H6 of the London Plan.

Table: Proposed flat sizes

Unit Type	SPD Requirement (sqm)	Size range proposed (sqm)*
1 Bed 2 Person (flat)	50sqm	52.2 – 54.3sqm
2 Bed 4 Person (WCH)	75sqm	91.8sqm*
2 Bed 4 Person (flat)	70sqm	72.5sqm
3 Bed 5 Person (flat)	86sqm	91.8sqm
3 bed 5 person (WCH)	99sqm	110.7 – 118.5sqm

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

105. Given the constrained nature of the site and limited footprint, there are no more than three units per floor. This enables the development to maximise the aspect of units. All units are at least dual aspect with some units benefitting from triple aspect. This is a significantly positive aspect of the scheme. Overall, it is therefore considered that the size and layouts of the units are acceptable, and would provide a good quality of accommodation.

Internal daylight and sunlight

106. An Internal Daylight and Sunlight Assessment has been submitted and demonstrates that the scheme achieves a very high level of compliance with the BRE recommendations.

Overlooking and privacy within the proposed development

107. The unit most at risk of potential overlooking and loss of privacy within the development is the one-bedroom unit nearby to the communal roof terrace on the eighth floor. To mitigate any potential overlooking or loss of privacy, the Air Source Heat Pump plant room has been proposed between the rear wall of the unit and the communal terrace therefore protecting the amenity of the future occupier/s of the unit.

Number of units per core

108. The development has a maximum of three units per floor, with two units per core on the first and eighth floor. The low number of units per core is due to the subject site being located on a corner plot.

Secured by design

109. The Metropolitan Police Secure By Design Officer has held discussion with the applicant and is satisfied that the development can achieve Secure By Design Accreditation. Conditions recommended by the Secure By Design Officer have been attached to this decision.

Conclusion on quality of accommodation

110. The floor layouts and size of the units proposed, and the fact they are all dual aspect are a positive aspect of this development and enables the occupiers to move freely through each unit without contriving circulation and movement. The provision of children's playspace at ground floor level and an external terrace at the 8th floor for enhances the quality of accommodation for future occupiers to enjoy. It is therefore considered that the proposed development would provide a high quality of accommodation for future residents.

Outdoor amenity space, play space and public open space

111. 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.
112. 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.
113. 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

114. 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).

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

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

116. 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.

117. In light of the above supplementary guidance, it is assumed that all units require 10sqm of private amenity space; the total requirement would be 220sqm (i.e. 22 units x 10sqm). All of the proposed units within the scheme provide between 5sqm and 14sqm private amenity balconies, with the majority of three beds within the development providing more than 10sqm of private amenity. The total amount of private amenity space within the scheme is 203sqm which gives a shortfall of 17sqm from the requirement. This shortfall is as required by supplementary guidance provided in the communal space within the development.

Communal amenity space

118. 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.

119. The communal requirement comprises a minimum of 50sqm, plus the 17sqm shortfall from the private, which equals 67sqm. A total of 86sqm of communal amenity is proposed. The communal amenity area that is proposed takes the form of an eighth floor terrace.

120. 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

	Proposal	Shortfall
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Communal amenity space proposed (Shared roof or terrace space)	86sqm Required 17sqm +50sqm = 67sqm	No shortfall (19sqm over provision)
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121. As demonstrated in the tables above, the provision of private and communal amenity space would meet and exceed the design guidance requirements.

Children's playspace

122. 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.
123. 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

124. 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.
125. 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 22.6, which equates to a total play space requirement of 226sqm. In total 117sqm of play space is provided on site.
126. The play space areas for each age group are provided in the ground floor garden. The design would 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. The applicant is advised that any design of playspace shall include water and sand play.

Children's play space calculations

Table: Proposed areas of dedicated external play

Location	Area of dedicated play space
Ground floor	117sqm

127. 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	58.5sqm (93 sqm required)	Play space proposed for all children up to 11 years old located on the ground floor (117)	109sqm 109sqm X £151 = £16,459
5-11 years	58.5sqm (74 sqm required)		
12+ years	0sqm (58sqm required)		

Public open space

128. In addition to the adopted amenity space requirements set out above, emerging Policy AAP11 of the draft OKR AAP requires the provision of 5sqm of public open space per proposed home. The plan identifies that some sites are expected to provide public space as part of their redevelopment and others are not. In the later instance those site will be expected to make s106 contributions to off-site public space provision. This 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.
129. As the building envelope is maximised on the development site, as set out in the draft AAP no public open space is proposed for the development with improvements to the existing condition of the footpaths along Varcoe Road and Verney Road being the “on site” public realm enhancements.

Public open space calculation

Table: Public open space proposed

Public Open Space (Public space at ground floor, excluding play space)	Draft OKR AAP (2017) requirement AAP 11: Parks, streets, open spaces –The Greener Belt. (page 73)	Proposed public open space	Off-site Payment
	Provide 5sqm of public open space per dwelling. If it is not feasible to deliver the open space on site, a financial contribution will be required. 110 sqm required	No public open space proposed as set out in the draft AAP masterplan for sub area 3	110 sqm shortfall 110sqm x £205 = £22,550

130. As set out in the table above, as no public open space is required on site as part of the AAP masterplan a financial contribution of £22,500 would be required. 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 regarding shortfall

131. In total, as set out above, the proposals under consideration would generate a financial contribution of £39,009 relating to play space and public open space, all of which would go directly towards new and existing park spaces in the AAP area.

Sunlight amenity analysis within the proposed development

132. BRE guidance for overshadowing to gardens and open spaces within a development recommends that at least 50% of any garden or amenity area should receive at least two hours of sunlight on 21 March. The ground floor playspace garden and the 8th floor terrace provide the external amenity sources for residents within the scheme. Tests undertaken using the BRE guidance demonstrate that the south facing 8th floor terrace adheres to the BRE recommendations. However, the ground floor playspace garden falls short of BRE recommendations given that it does not ideally have a southerly aspect to its location within the development. Notwithstanding this, given all the residential units have access to the 8th floor terrace the sunlight to amenity spaces is, on balance, considered acceptable. In addition, it is considered that the ground floor garden provides a secure area for the playspace provision, and this secure provision is supported.

Conclusion on outdoor amenity space, play space and public open space

133. In conclusion, given the density and site coverage of the scheme under consideration, Officers are on balance satisfied with the quality and quantity of outdoor space proposed. Whilst there is a shortfall for children's playspace, this is to a degree off set by the high quality of the residential accommodation, with 100% dual aspect and the provision of private and communal space. Given this is a relatively small site it is acknowledged that it is difficult to provide all play space on site. The proposed financial mitigation is therefore considered acceptable. The agreed financial contributions that would directly fund the maintenance of areas of open spaces and parks within the opportunity area. Where communal amenity space is proposed on site, it is well planned, with efficient layouts that do not restrict movement or circulation with easy access from the proposed units. The landscape proposals for the external terrace areas are efficiently planned which is a positive aspect of the scheme. To ensure the spaces delivered are of the highest quality, detailed landscape design can be secured by condition.

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

134. 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

135. As the neighbouring 1 Varcoe Road scheme provides a flexible use on the ground floor, it is considered that the continuation of flexible unit on ground floor of the development site would provide activation at street level and enhance the vitality of Verney Road and Varcoe Road. In addition, the residential units on the upper floors would provide a mixed use development that complies with the aims and objectives for OKR 13 within the OKR AAP. On this basis, it is considered that the proposed uses would not cause any harm to surrounding neighbour amenities, and accordingly are all found to be acceptable uses.

Daylight and sunlight impacts

136. 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

137. 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.

138. 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.”

139. Diffuse daylight is the light received from the sun which has been diffused through the sky. Even on a cloudy day, when the sun is not visible, a room will continue to be lit with light from the sky. This is diffuse daylight. Diffuse daylight calculations should be undertaken to all rooms within domestic properties, where daylight is required, including living rooms, kitchens and bedrooms. The BRE guide states that windows to bathrooms, toilets, storerooms, circulation areas and garages need not be analysed. These room types are non-habitable and do not have a requirement for daylight.
140. The BRE guideline tests undertaken for this daylight assessment are the Vertical Sky Component (VSC) and Daylight Distribution (DD). 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.
141. The distribution of daylight within a room can be calculated by plotting the ‘no skyline’. The no sky-line is a line which separates areas of the working plane that do and do not have a direct view of the sky. Daylight may be adversely affected if, after the development, the area of the working plane in a room which can receive direct skylight is reduced to less than 0.8 times its former value.

BRE sunlight tests

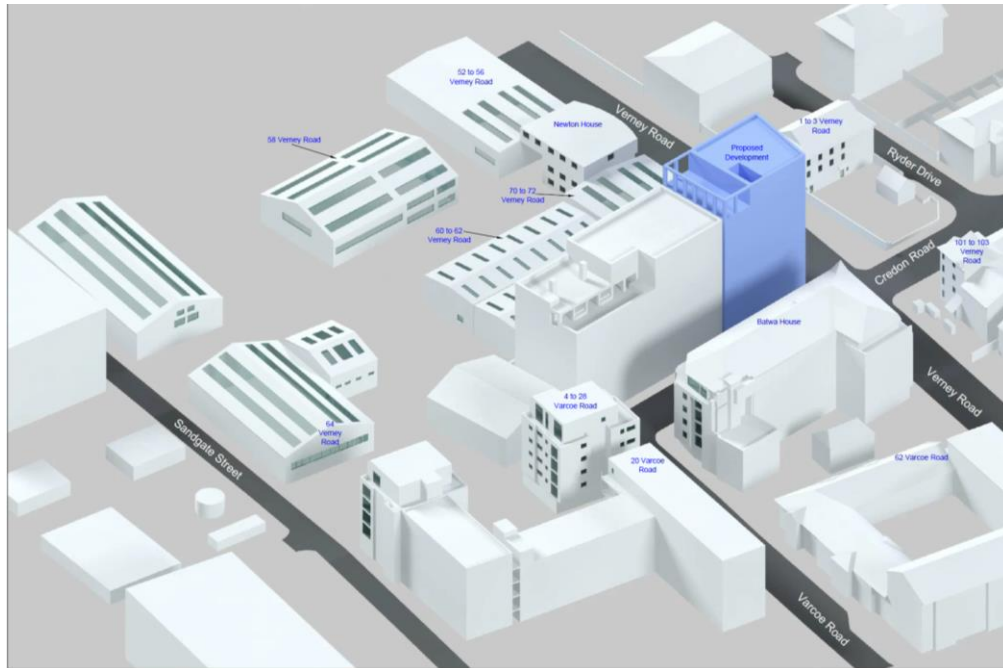
142. The BRE sunlight tests should be applied to all main living rooms and conservatories which have a window which faces within 90 degrees of due south. The guide states that kitchens and bedrooms are less important, although care should be taken not to block too much sunlight. The tests should also be applied to non-domestic buildings where there is a particular requirement for sunlight. The BRE guide states that sunlight availability may be adversely affected if the centre of the window:
- receives less than 25% of annual probable sunlight hours, or less than 5% of

- annual probable sunlight hours between 21 September and 21 March and
- receives less than 0.8 times its former sunlight hours during either period and
- has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours.

Overshadowing

143. 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.'
144. The closest properties to the development consist of a mix of residential and commercial buildings. These properties are:
 - Batwa House,
 - 4 to 28 Varcoe Road
 - 20 and 62 Varcoe Road
 - 1 to 3 Verney Road
 - 52 to 56 Verney Road
 - 58 Verney Road
 - 60 to 62 Verney Road
 - 64 Verney Road
 - 70 to 72 Verney Road
 - 101 to 103 Verney Road
 - Newton House

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



Daylight impacts

145. Newton House, 52 to 56, 58, 60 to 62, 64 & 70 to 72 Verney Road are not in residential use which does not have a requirement for daylight. Notwithstanding this, the windows at these properties were tested, and all main windows were found to pass the Vertical Sky Component test. All other properties in the above list are in residential use and do have a requirement for daylight, and all windows tested also pass the Vertical Sky Component test, with the exception of some isolated windows at Batwa House and window no. 437 at 101 to 103 Verney Road.
146. The results show that nine main living room windows at Batwa House fall short of the VSC daylight recommendations with the lowest before/after ratio being 0.33 against the BRE recommendation of 0.8. It is important to note however, that for five of these windows (windows 5, 7, 9, 11 & 12) are part of dual aspect units with at least one window that meets the BRE VSC recommendations. Whilst it is acknowledged that there is a relatively significant impact to the single aspect units, it is considered that given that there are minimal affected single aspect units, on balance, the results demonstrate that the daylight and sunlight impacts would not adversely impact the occupiers to an extent that would warrant a reason for refusal.

Images: Location of windows 5, 7, 9, 11 & 12 Batwa House – Affected windows in blue



147. 46 of the habitable room windows tested at Batwa House are already hampered by overhangs and/or projecting wings. The BRE guide acknowledges that in these situations windows typically receive less daylight. When discussing balconies, the guide states that because a balcony cuts out light from the top part of the sky, even a modest obstruction opposite may result in a large relative impact on the VSC. The guide explains that an additional calculation may be carried out assuming that the balcony does not exist. If the windows meet the targets on this basis, then this shows that the presence of the balcony, rather than the size of the new obstruction, was the main factor in relative light loss. The guide states that a larger relative reduction in VSC may also be unavoidable if the existing window has projecting wings on one of both sides or is recessed into the building.
148. In order to separate the effect of the proposed development from the effect of the overhangs and projecting wings, daylight levels at Batwa House were re-tested on the hypothetical basis that the overhangs and wings do not exist. Of the 18 main living/dining/kitchen windows that do not meet the VSC recommendation with the balconies and wings present, nine windows meet the recommendation when the overhangs and wings are excluded. The nine remaining windows which still fall short of the recommendations with the balconies and wings removed, achieve VSC ratios of 0.4 to 0.78 against the BRE recommendation of 0.8.
149. The results of the DD Test show that eleven of the 24 living/dining/kitchens at Batwa House surpass the BRE DD recommendations, and 13 fall short. This is when balconies and projecting wings are included in the calculations. The BRE guide does not clarify on whether it is appropriate to undertake additional testing with overhangs and wings removed when it comes to the DD test. Nevertheless, additional testing was undertaken in order to separate the effect of the proposed development from the effect of the overhangs and wings, in the same way as for VSC.

150. The results demonstrate that with the balconies and projecting wings removed, 12 of the 24 living/dining/kitchens at Batwa House surpass the BRE DD recommendations, and 12 falls short. For those that fall short, it is important to note that all are deep, single aspect rooms, which are in excess of 5m. The BRE Guide acknowledges that if an existing building contains rooms lit from one side only and (are) greater than 5m deep, then a greater movement of the no sky line may be unavoidable. All other windows at Batwa House appear to be secondary windows and windows to non-habitable rooms which do not have a requirement for daylight - or bedroom windows, which the BRE guide acknowledges have less of a requirement for daylight and are therefore less important than living rooms and kitchens. Overall, the current scheme demonstrates a marginal improvement to the VSC recommendations to a number of windows at Batwa House, when compared to the previous design of the scheme (19/AP/7550).
151. Window 437 at 101 to 103 Verney Road falls short of the VSC recommendation with a before/after ratio of 0.78 against the BRE 0.8 recommendation. Window 437 is affected by a projecting wing and surpasses the BRE recommendation when the calculation is undertaken without the projecting wing. The DD test was not undertaken for this property as room layouts are not known.

Image: Location of windows 414 and 437 – Affected windows in blue



152. All main habitable room windows at all other neighbouring properties, meet or surpass the BRE daylight recommendations, including the daylight distribution test where room layouts are known. Overall, the site currently comprises of low lying development in an area which has been allocated for significant redevelopment and regeneration. It is therefore considered that any meaningful development of the subject site will have some daylight impacts. However, given the public benefits of the scheme, this does not warrant a reason for refusal on this application.

Sunlight impacts

153. In accordance with the BRE recommendations, the sunlight tests have been applied to windows that face within 90 degrees of due south. The results confirm that eight of the 30 living/dining/kitchen windows at Batwa House fall short of the

BRE annual probable sunlight hours recommendations. These are windows 3, 13, 14 and 30 to 34. However, windows 13 & 14 surpass the BRE recommendations when the calculations are undertaken with the balconies and projecting windows removed.

154. All main habitable room windows at all other neighbouring properties, meet or surpass the BRE sunlight recommendations with the exception of window 414 at 1 to 3 Verney Road and window 437 at 101 to 103 Verney Road. Since access has not been granted to 1 to 3 Verney Road, the room uses were unable to be confirmed. Despite this, the numerical sunlight targets of 25% annually and 5% during the winter only apply to main living room windows. From the external observations of the sunlight report, it seems unlikely that all of the above-mentioned windows are main living room windows. Window 437 is affected by a projecting wing and surpasses the BRE recommendation when the calculation is undertaken without the projecting wing.

Overshadowing

155. The results of the overshadowing test show that sunlight availability after the development will be no less than 0.8 times the former value. The proposed development therefore passes the BRE overshadowing to gardens and open spaces test.

Daylight and sunlight conclusions:

156. The proposed development is considered to comply with the BRE guidance on daylight and sunlight. It is acknowledged that there is a degree of impact caused to the south facing windows on the corner units within Batwa House. However, this loss of daylight is prominently from the balconies in situ. The DD test undertaken that removes balconies from analysis concludes that the majority of windows pass the DD test, with the affected windows being in a dual aspect room meaning that the loss of daylight is not overly discernable given the additional source of daylight into the affected room. On balance, Officers are satisfied that the scheme achieves an overall high level of compliance with the BRE recommendations, and due to the existing mitigating factors mentioned in this assessment, the loss of daylight or sunlight from the development is not substantial enough to warrant a reason to refuse this application.

Overlooking of neighbouring properties

157. In order to prevent harmful overlooking, the Residential Design Standards SPD requires proposed developments to achieve a distance of 12m between the front elevations of buildings and/or across a highway, and a minimum of 21m between rear elevations.
158. The subject site sits on a corner plot between Verney Road and Varcoe Road and therefore has two front elevations; one fronting onto each of these roads. Due to the highway separating the north and eastern elevations of the proposed building from the closest adjoining residential properties, the proposed

development will exceed the minimum separation distance of 12 metres as set out in Southwark's SPD.

159. The building immediately to the south of the application site is 1 Varcoe Road. The development does not include any windows on its northern elevation facing onto the application site and the proposed building would abut its existing north elevation. As such, there will be no overlooking from the proposed development into the existing Pocket scheme to the south.
160. 1 Varcoe Road also has a roof terrace providing external amenity space for occupants. However, the adjoining Varcoe Road development is also stepped in height with the block immediately adjoining the application site having a height of eight storeys and the southern element being six storeys in height. The external terrace at 1 Varcoe Road is located on the lower roof on the southern block with the roof closest to the subject site housing plant. As such the roof terrace and communal amenity space of the adjoining development will be screened from view of the proposed roof terrace by the taller element of the Varcoe Road scheme.
161. The T Marchant site to the west is currently in industrial use and as such the requirements of the SPD do not apply. Notwithstanding this, the development has been designed as to not prejudice the redevelopment of the T Marchant site should it come forward for development in the future with the western elevation of the scheme set off from the boundary. If development does come forward on the site, any scheme would likely be stepped back from the boundary with the subject site to enable the current development site and future development site to maintain an acceptable distance between the flank walls.

Transport considerations

162. Saved Policy 5.2 of the Southwark Plan seeks to ensure that developments do not result in adverse highway conditions; 5.3 requires the needs of pedestrians and cyclists to be considered and 5.6 establishes maximum parking standards.
163. In assessing this application from a transport perspective, the site is located in an area that the council is considering pedestrian, and cycle changes to enable healthy streets. The proposals will not prevent these plans being delivered.
164. Southwark have recently adopted their Movement Plan, a people, place and experience approach to transport planning rather than a modal one. This application has been assessed on how it will contribute to the nine Missions.
165. The Mayors Transport Strategy (MTS) Mayors Transport Strategy (MTS) includes three strategic challenges that are of significant importance to assessing this application.
 - Good Growth
 - New homes and jobs

- A good public transport experience

166. 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.

167. 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

168. The site is located at the junction of Verney Road and Varcoe Road. Verney Road and Varcoe Road are two-way roads, restricted to a 20 mph speed limit and are illuminated. Varcoe Road has two sections to the east and west of the fire gate situated along it near Bramcote Grove. The kerbside is currently largely uncontrolled.

Proposed site layout

169. The proposed site layout will improve the walking experience. The residential and commercial uses will have separate access points within the development. As the development is car-free, there is no vehicular access to the site. The dropped kerb will be removed and reinstated as footway through the S278. 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.

Trip generation

170. The proposed scheme will generate largely sustainable methods of trips it is estimated that motorised vehicle trips will be average of four per day.

Servicing and delivery

171. Delivery and servicing for the proposed residential and light industrial uses will be undertaken on-street. Waiting restrictions in the form of single/double yellow lines, or a loading bay along the sites frontage will be introduced as part of the CPZ currently in development. Refuse collection will take place on-street as shown in Drawing 30959/AC/004_H. The refuse store is located within 10m of the collection point. Collection of the flexible commercial waste will be undertaken by private waste contractors. The private waste contractors will also stop on street. It is estimated that the site will generate in the region of 3-4 deliveries per day.
172. 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 Regulation 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
173. The proposal is for the management of the new development to monitor the daily vehicular activity of the site both commercial and student accommodation, quarterly for a period of two years from 75% occupancy. If the site meets or better its own baseline target the bond will be returned within six 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. In this instance the bond secured by S106 for 21/AP/3246 will apply for the combined trips over both sites.
174. 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

175. The site is situated in an uncontrolled area however CPZ OKR has been consulted and will include loading and pay and display bays subject to formal consultation will be in place autumn 2022. The proposed development will be car-free. The constraints of the site means that the provision of on-site blue badge parking would significantly constrain the redevelopment of the site, reducing the developable area and conflicting with the London Plan's requirement to optimise housing delivery. Overall, the provision of affordable housing has been prioritised across the site which is a significant public benefit

and outweighs the lack of on-site blue badge parking, particularly given the availability of on street parking in the surrounding area.

There will be a S106 obligation that prevents residents and office users of the proposed development from obtaining resident parking permits of the existing CPZ.

Public transport

176. The site is well served can access local bus routes within a 200m walk of the site. The nearest rail station to the site is South Bermondsey Station which is located circa 500m north east of the site, or a seven-minute walk. As a borough Southwark agree 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. As part of the submission, the applicant has provided a note from TfL stating that this contribution will not be sought for this development due to the development providing less than 50 new residential units.

Active transport

Walking and public realm

177. The TA does include an Active Travel Survey. The new development will benefit from the proposals to connect to the proposed linear park, which is part of the green belt proposals across the whole of south London. The linear park will provide a direct link between Burgess Park and Ilderton Road, and further across Southwark. The application should provide for wider footways. This will be delivered through the S278 agreement.

Cycling

178. The site is located close to Quietways and will benefit from the proposed link to the new linear park. Cycle parking will be provided in line with the London Plan 2021 standards. The proposals will provide 42 secure and covered cycle parking spaces for residents, of which two will be provided on Sheffield stands for larger/adapted bikes. Two commercial long-stay and four short-stay cycle parking spaces are also proposed for the development. A condition is attached to this decision required detailed design of the cycling parking provision. The S106 Agreement will include a contribution towards the delivery of a new Cycle Hire Docking station of £50 per residential unit.

Construction

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

Conclusion on Transport

180. The proposal is supported as it will reduce car dependency which will contribute to the efforts against climate change and to the delivery of some of the Movement Plans 9 missions. In particular, these include Vision Zero and Healthy Streets, and allows for the emerging plans for the surrounding public highway to be facilitated subject to the adherence to the S106 obligations and planning conditions mentioned in this section of the report.

ARCHAEOLOGY

181. The site is within the 'Bermondsey Lake' Archaeological Priority Zone (APZ), which is designed to protect the palaeological environment and prehistoric archaeology recovered from the shoreline and relict fills of the large Late Glacial Bermondsey Lake and the associated riverine geology and topology. The site is also close to the 'Old Kent Road' APZ, which has the potential to contain features associated with the former route of 'Watling Street', the major Roman road between London and Canterbury. When the New Southwark Plan is adopted, the site will lie within the newly extended 'North Southwark and Roman Roads' Tier 1 Archaeological Priority Area (APA).
182. Saved Policy 3.19 of the Southwark Plan (2007) requires that proposals for development in APZ/As should be accompanied by an archaeological desk-based assessment (DBA) and an evaluation report (the results of digging archaeological trial trenches). The applicants have submitted a DBA which has shown that significant archaeology remains were found in close proximity to the site, including prehistoric activity and landscapes and Roman occupation. The proposed development does not include a basement but has foundations, lift pits and other ground interventions relating to the proposed development will still have an impact on archaeological remains.
183. The Council's Archaeologist has no objection to the redevelopment of the site with four pre-commencement conditions recommended to be attached to any planning permission. The four conditions include; Archaeological Evaluation, Archaeological Mitigation, Archaeological Foundation and Design, and Archaeological Reporting. The recommended conditions are attached to this decision.

AVIATION

184. 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

185. 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.
186. Arqiva did not respond to a consultation letter regarding the development sent on 14/09/2021. It is therefore considered that Arqiva do not have an objection to the proposed development.

ENVIRONMENTAL CONSIDERATIONS

Wind and microclimate

187. A microclimate is the distinctive climate of a small-scale area and the variables within it, such as temperature, rainfall, wind or humidity may be subtly different to the conditions prevailing over the area as a whole. The main characteristics of microclimates within London are temperatures and wind. As the development does not propose a large area of space between the two buildings, the scheme is not of a scale that could potentially have any significant impact on wind conditions around the site or any adverse effects on pedestrian and residents' comfort.

Fire strategy

188. Policy D12 of the London Plan 2021 expects all development proposals to achieve the highest standards of fire safety and to this end requires applications to be supported by an independent Fire Strategy, produced by a third party suitably qualified assessor.
189. The strategies demonstrate how the development would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. The provision of a suitably-sized evacuation lift in the residential core is also proposed in line with Policy D5 of the London Plan. The measures contained within the statements are secured by condition within the decision notice. GLA Officers have reviewed the submitted Fire Statement and raise no objection to the information within the document.

Flood risk and water resources

190. 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.

191. The Environment Agency (EA) has reviewed the submitted information in relation to flood risk 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, details will need to be submitted that demonstrate that there is no resultant unacceptable risk to groundwater.
192. The site is currently wholly developed comprising an existing building and hardstanding. The development proposals will aim to reduce the peak run-off rates from the site to as close to the greenfield runoff rates as is feasible. The Council's Flood Risk Team has reviewed the revised Flood Risk Assessment and Drainage and are satisfied with the surface water runoff rates being limited to 2l/s. This results in a 90% improvement on the existing runoff rates currently on site. A pre-commencement condition has been attached to the decision notice seeking full details of the proposed surface water drainage system incorporating Sustainable Drainage Systems (SuDS).
193. Additional information was provided to Southwark Flood Risk Officer through the document titled Flood Risk – Response to Planning Comments (dated 11/01/2022). From this note Officers are satisfied that suitable justification has been provided for the non-inclusion of rainwater harvesting. Additionally, the proposed discharge point of the existing Thames Water sewer is deemed acceptable. Finally, the drainage strategy drawing that has been provided is considered an outline drawing only. The detailed drawing should include pipe sizes, gradients, manholes cover and invert levels and full information on the proposed SuDS features included within the strategy.

Ground conditions and contamination

194. A Phase 1 Environmental Study has been undertaken by RSK which identifies evidence of possible ground contamination on site, however, no major pathways are included in the proposed form of development via which contamination may migrate and impact sensitive receptors. As such, the report concludes the site is unlikely to be classified as 'Contaminated Land' under the current contaminated land regime (Environmental Protection Act 1990: Part IIA). Additionally, it is noted that no residential units are proposed on the ground floor. The Council's Environmental Protection Team has assessed and raised no objection. A condition is to be imposed requiring a Phase 2 investigation to be conducted and the results submitted to the council for approval, with further remediation measures to apply if contamination is found to be present.
195. The Environment Agency have reviewed the proposals in relation to contaminated land and made the following recommendation.

196. "We have reviewed the document 'Phase 1 Environmental Study' by RSK (reference 29439 R01 (01) dated 8 November 2017). The study has indicated the potential for ground contamination to be present and has recommended an intrusive investigation to assess this. It should be considered that planning permission should only be granted to the proposed development as submitted if the appropriate planning conditions are attached to the approval.
197. The recommended conditions are included in the draft decision notice.

Air quality

198. 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." An Air Quality Assessment (AQA) was submitted with the application, which considers the air quality impacts arising from the construction and operational use of the development, taking into account all relevant local and national guidance and regulations. The AQA concludes that subject to the offered mitigation the effects on air quality during construction and operation are considered to be negligible. EPT Officers agree with the conclusions of the report and raise no objection.

Noise and vibration

199. A noise assessment and addendum have been submitted in support of this application, prepared by KP Acoustics. The report demonstrates a robust glazing specification would provide internal noise levels for all residential environments which would comply with the British Standard for residential accommodation. EPT Officers agree with the findings of the report and recommend conditions be attached to safeguard the amenity of occupiers within the development and nearby residents and businesses. The conditions recommended are attached to this decision notice.

Agent of change

200. Where new noise- and other nuisance-generating development is proposed close to residential and other sensitive uses, Policy D13 of the London Plan 2021 requires the proposal, as the incoming 'agent of change', to be designed to mitigate and manage any impacts from existing sources on the future users/occupiers. Developments should be designed to ensure that established noise and other nuisance-generating uses remain viable and can grow without unreasonable restrictions placed on them.
201. The adjoining site to the west of the Application Site, the T Marchant Industrial Estate, is currently in industrial and commercial use. As such, the development has been designed to protect future occupants from any potential noise disturbance from this adjoining site, in order to protect the viability of the daily

industrial activities taking place on this site. The western elevation of the proposed building has been setback from the shared boundary by the communal garden located at ground floor. This results in a minimum separation distance of 5.6m between the western windows and this shared boundary. It is noted that any forthcoming development on the adjoining site will be setback from the boundary with the application site.

202. It is therefore considered that the subject scheme will not harm the operation of the existing neighbouring businesses and will mitigate any noise generated through the uses through the design of the scheme and use of appropriate glazing. Additionally, it will not prejudice the potential future redevelopment of the adjoining site and thereby complies with London Plan Policy D13.

Sustainable development implications

Energy

203. Policy SI2 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. Policy SI3 require consideration of decentralised energy networks, Policy SI4 deals with managing heat risk and Policy SI5 is concerned with protecting and conserving water resources and associated infrastructure.
204. Policy 13 of the Core Strategy and Saved Policy 3.4 of the Southwark Plan 2007 sets out the borough approach to ensuring that new developments tackle climate change. The approach is generally consistent with London Plan Policies but also requires new commercial developments to meet BREEAM 'Excellent'.
205. As per the carbon emission reduction policies of the London Plan 2021 and local development framework, both the residential and non-residential elements of the proposal would be expected to achieve zero carbon (with offset permitted once an on-site 35% carbon reduction against part L of the Building Regulations 2013 has been achieved). Southwark Council's carbon offset cost is £95 for every tonne of carbon dioxide emitted per year over a period of 30 years. This is the equivalent of £2,850 per tonne of annual residual carbon dioxide emissions.
206. An Energy Assessment and Sustainability Strategy based on the Mayor's hierarchy has been submitted by the applicant. This details how the targets for carbon dioxide emissions reduction are to be met. A combination of 'Be Lean' 'Be Clean' and 'Be Green' measures have been employed in an attempt to achieve the reduction in line with the GLA guidance on preparing energy statements, the Southwark Core Strategy 2011 and the Southwark Sustainable Design and Construction SPD.

Be Lean (use less energy)

207. The development achieves a 12% reduction in overall carbon emissions over Part L 2013, through passive design and energy efficiency measures alone. The reduction will be achieved by a combination of measures, which include; significantly improved fabric 'U' values, improved air tightness, minimising cold bridging, and optimisation of size and g-value of the glazing to provide a balance between minimising heat gain and maximising natural daylight (to reduce lighting energy). Other measures consist of communal heating system to the building, high efficiency ventilation systems such as Mechanical Ventilation with Heat Recovery to the residential apartments, minimising heat loss from heating and hot water systems along with low energy lighting, smart meters, and control systems to monitor and operate the plant and equipment as efficiently as possible

Be Clean (supply energy efficiently)

208. There is no existing heat network which can be connected at this stage; therefore, it is proposed for the development of the site to be 'future proofed' to allow connection to the heat network at a later date. In this regard, the development proposes to provide a site-wide heat network serving all parts of the development, fed by air source heat pumps and future heat network connection. This network would operate at a lower temperature than for a boiler system to maximise the efficiency of the heat pumps, with the domestic hot water temperature raised locally in each apartment by in apartment water-water heat pumps. The site heat network will have the following provisions to allow connection to a future community heat network;
- Space within energy centre for future community energy interfacing heat exchanger, pumps, controls etc.
 - Provision to allow future community energy connecting pipework to be routed through from outside
 - Spare ways on local electrical distribution boards for future electrical supplies to pumps, controls etc.

209. The site heat network within the development will be designed in accordance with CIBSE CP1 Heat Networks: Code of Practice. The development has been arranged with the cores located centrally to minimise lateral pipe runs and hence heat losses. The system will operate with a variable volume and maximum temperature to satisfy the requirements of the tertiary system, which delivers the heat demand to the occupied spaces. A high level of insulation (in excess of British Standards) will provide to all parts of the systems, in accordance with the recommendations of CIBSE CP1.

Be Green (Low or Carbon Zero Energy)

210. As stated above, heat pumps are proposed as the main heat source and the carbon savings generated will be reported under the Be Green stage of the hierarchy. An assessment of the feasibility of including any further on-site renewable energy has been carried out and shows that Photovoltaics are

appropriate for the development and it is proposed to provide an installation of 10.9 kWp, requiring a total active panel area of 53.6m². The heat pumps and PVs are expected to provide a further 59.2% improvement over Part L 2013 following the passive design/energy efficiency measures.

211. Taking into consideration the measures assessed in this section of the report, the development exceeds the minimum 35% improvement over Part L Building Regulations, achieving on site reductions of 71% for the residential aspect, and 66% for the commercial element of the scheme. As the development is unable to achieve the full 'Zero Carbon' target on site a contribution to the Borough's carbon offset fund will be required. The domestic elements carbon shortfall of 7.4 tonnes CO₂ per annum amounts to £21,046, with the non-domestic element of the scheme resulting in a 0.5 tonnes CO₂ shortfall contribution of £1,520. The overall contribution that is to be secured in the S106 Agreement is £22,566. The S106 Agreement will also include the obligation of requiring the development to be constructed in accordance with the Energy Assessment and Sustainability Strategy.

Overheating

212. London Plan Policy SI4 and Policy P68 of the NSP set out the cooling hierarchy that should be followed when developing a cooling strategy for new buildings. The six-step hierarchy is as follows:
- Minimise internal heat generation through energy efficient design; then
 - Reduce the amount of heat entering the building through the orientation, shading, albedo, fenestration, insulation and green roofs and walls; then
 - Manage the heat within the building through exposed internal thermal mass and high ceilings; then
 - Use passive ventilation; then
 - Use mechanical ventilation; then
 - Use active cooling systems (ensuring they are the lowest carbon options).
213. The residential assessment includes dynamic thermal modelling on a representative sample of three apartments to assess the risk of overheating, using IES modelling software, in accordance with the guidance and data sets in CIBSE TM49 and TM59 guidance. Non-domestic risk assessment for overheating has been made against the three criteria outlined in CIBSE TM52. The results of the dynamic modelling overheating assessment demonstrates that the CIBSE compliance criteria are generally met (for the DSY1 weather scenario) through the use of natural ventilation via openable windows/doors. Active cooling is therefore not proposed. The CIBSE compliance criteria cannot be met in the non-domestic areas using natural or mechanical ventilation, and therefore active cooling is proposed.

Whole life cycle and carbon capture

214. London Plan Policy SI2 requires a calculation of whole life cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon

Assessment (WLCA). This captures a development's unregulated emissions, its embodied emissions and the carbon impact of mid-life maintenance and end-of-life dismantling.

215. The WLCA has been undertaken in accordance with the 'RICS Whole Life Carbon Assessment for the Built Environment' (First Edition, November 2017) which outlines the process of WLCA, and what is, and what is not included. The aim of the RICS document provides clarity on the EN 15978: 2011 for the sustainability assessment of buildings and on the approach required within this methodology. The assessment utilises recognised industry software and inputs from IES VE modelling and SAP modelling to evaluate the lifecycle carbon content of materials and M&E fittings of the site, over a 60-year lifespan. The assessment of the materials' carbon emissions also includes the replacement of certain items in line with industry standards.
216. The results of the assessment has been compared to the WLC benchmark specified in the GLA guidance for apartments as this is deemed the most suitable building type to be used for comparison. The WLC benchmarks specified are used as a guide where projects with higher WLC emissions than the benchmarks are urged to examine how they can reduce WLC emissions. A further set of aspirational WLC benchmarks have been developed which are based on a 40% reduction in WLC emissions on the first set of WLC benchmarks. This is based on the World Green Building Council's target to achieve a 40% reduction in WLC emissions by 2030.
217. The results in the table show that the carbon emissions associated with modules A1-A5 is within the aspirational WLC benchmark, but Modules B-C (excluding B6 & B7) exceeds the WLC benchmark specified in the GLA guidance. However, it should be noted that available information for lifecycle stages B1, B2 and B3 are limited at the time of assessment hence are based on a number of assumptions. The figures presented in the table below are the result of a point-in-time assessment, and as more quantities and details of the components become available, the WLCA model will need to be updated to capture the embodied carbon emissions for the development more accurately. A condition regarding a post assessment WLC is attached to the decision notice.

Table: WLCA Emission Results compared to GLA benchmarks

Module	Sitewide	WLC Benchmark	Aspirational WLC benchmark
Modules A1-A5	455.50 kgCO ₂ e/m ²	750 to 850 kgCO ₂ e/m ²	450 to 500 kgCO ₂ e/m ²
Modules B-C (excluding B6 & B7)	778.24 kgCO ₂ e/m ²	300 to 400 kgCO ₂ e/m ²	180 to 240 kgCO ₂ e/m ²

Circular economy statement

218. Policy GG5 of the London Plan 2021 promotes the benefits of transitioning to a circular economy as part of the aim for London to be a zero-carbon city by 2050. Policy D3 requires the principles of the circular economy to be taken into account in the design of development proposals in line with the circular economy

hierarchy. Policy SI7 requires referable applications to develop circular economy statements.

219. The submitted Economy Statement demonstrates the sustainability measures incorporated into the design of the development, and outlines the adoption of circular economy principles throughout the design, construction and operation of the proposed development. Through the incorporation of fundamental sustainability principles, the proposed development has:

- Demonstrated how materials have been selected on site based on longevity and/or environmental impact;
- Shown how waste generated from site will be targeted, reduced and managed appropriately in line with waste hierarchy;
- Adopted a flexible and adaptable design which will meet the needs of the present and future;
- Specified materials which are appropriate to their intended use, and take account of durability and longevity;
- Used 'Building in Layers' principles to ensure that elements needing replacing within a shorter time period can do so easily;
- Considered operational waste generation and provided adequate internal and external storage, in addition to providing information to future occupants about the reduction of waste from consumable items and the impacts this has.
- Considered end of life impacts and the potential for material re-use following building disassembly;

BREEAM

220. Strategic Policy 13 of the Core Strategy requires commercial units to achieve BREEAM "Excellent". New Southwark Plan Policy P68 to provide BREEAM assessment on commercial units of 500sqm or more. As the proposed commercial unit is 82sqm in floor space, the development falls below the threshold identified in NSP P68 for non-residential development.

Water efficiency

221. For the residential aspect of the development, the applicant's Energy Assessment and Sustainability Strategy confirms that the dwellings would have a maximum indoor water consumption of 105 litres per person per day, in line with the optional standard in Part G of the Building Regulations. This will be achieved through the provision of efficient water fittings throughout the development, including aerated shower heads and taps (also helping to reduce hot water demand), dual flush toilets, and low water consumption appliances where provided. Therefore the development complies with Policy SI5 of the London Plan 2021.

Digital connectivity infrastructure

222. The NPPF recognises the need to support high-quality communications infrastructure for sustainable economic growth and to enhance the provision of local community facilities and services. To ensure London's long-term global competitiveness, Policy SI6 (Digital Connectivity Infrastructure) of the London Plan 2021 requires development proposals to:

- be equipped with sufficient ducting space for full fibre connectivity infrastructure;
- achieve internet speeds of 1GB/s for all end users, through full fibre connectivity or an equivalent.
- meet expected demand for mobile connectivity; and
- avoid reducing mobile capacity in the local area.

223. A pre-commencement is attached to the decision notice that requires detailed plans to be submitted to and approved in writing by the Local Planning Authority demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development. This is in line with the requirements of Policy SI6 of the London Plan 2021.

Planning obligations (Section 106 Undertaking or Agreement)

224. Saved Policy 2.5 of the Southwark Plan and Policy DF1 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

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

Table: Section 106 Financial Obligations

Planning obligation	Mitigation	Applicant's position
Local Economy and Workspace		
Employment and Enterprise	Allow for local procurement and supply chain measures during construction and after construction.	Agreed
Housing and Viability		
Wheelchair Units	3 Wheelchair accessible units are to be provided.	Agreed
Management Plan	Management, operation and promotion strategy to be submitted and agreed prior to occupation.	Agreed
Transport and Highways		
Highway works	<ul style="list-style-type: none"> • A detailed Construction Management Plan (CMP) and a £40 per unit (£880) contribution for Construction Management within the OKR AAP area. This is for the Council to manage cumulative impacts on the highways and environment. • A contribution towards the provision of a TfL Cycle Hire Docking Station (£1,100) • S.278 works with the highway authority for highway works, and traffic management change. 	Agreed
Parking permit restriction	This development would be excluded from those eligible for car parking permits under any future CPZ operating in this locality.	Agreed

Energy, Sustainability and the Environment		
Futureproofing for connection to District Heat Network (DHN)	Prior to occupation, a CHP Energy Strategy must be approved setting out how the development will be designed and built so that it will be capable of connecting to the District CHP in the future.	Agreed
Achieving net carbon zero	an off-set payment of £22,566	Agreed
Archaeology monitoring/ supervision fund	Contribution towards cost of providing technical archaeological support (£3,389 for schemes under 5,000sqm)	Agreed
Open/Play Space	A contribution of £39,009 for the combined open and playspace shortfall on site	Agreed
Administration fee	Maximum contribution to cover the costs of monitoring these necessary planning obligations, calculated as 2% of total sum	Agreed

226. 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;
- London Living Wage – reasonable 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;
- Car club membership for three years restricted to one per household
- Securing Gort Scott Architects or similar architect to deliver the building detailed design, unless otherwise agreed in writing
- Appointment of workspace co-ordinator;
- Workspace Specification (including full M&E fit out);
- Triggers securing Practical Completion of workspace;
- 82sqm Affordable workspace – Available for 30 years minimum at £17 per sqft to the end user (subject to annual RPI increases);
- Affordable Workspace Management Plan, including marketing requirements;

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

228. In the event that a satisfactory legal agreement has not been entered into by 2 August 2022, it is recommended that the Director of Planning and Growth 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), and London Plan (2021) policies H4 'Delivering affordable housing' and DF1 'Delivery of the Plan and Planning Obligations', as well as guidance in the council's Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015)”.

S278 Works Outline

229. An S278 agreement will need to be undertaken with Southwark Highways for works to the highway, and traffic management changes.

Mayoral and Southwark Community Infrastructure Levy (CIL)

230. 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.
231. The site is located within Southwark CIL Zone 2 and MCIL2 Band2 zone. Based on the existing floor areas provided in the agent’s CIL Form1 dated 07-Sep-21, the gross amount of CIL (pre-relief) is approximately **£626,482.33** consisting £123,573.27 of Mayoral CIL and £502,909.06 of Borough CIL. Subjecting to the correct CIL forms being submitted on time, approximately £612k of CIL Social Housing Relief can be claimed for a number of types of affordable housing, such as the social rented tenure proposed. It should be noted that **this is an estimate, and the floor areas will be checked** when related CIL Assumption of Liability Form and Relief Claim Form are submitted **after** planning approval has been obtained.”

OTHER MATTERS

232. None

Conclusion on planning issues

233. The major redevelopment of the site is supported and welcomed in principle. The principle of housing on the site is in line with draft AAP and NSP policy aspirations to increase the number of new homes in the area.
234. The development would result in an uplift of 82sqm of Class E floorspace that is aimed at light industrial users, and is to be secured as Affordable Workspace within the S106 Agreement. This is considered to be a major benefit of the scheme
235. The proposed mix of uses would add to the vibrancy of the area which would be complemented by public realm improvements to Verney Road and Varcoe Road. There would be an enhanced relationship from the proposed development to the street scene with active frontages created on both sides of the development.
236. The scheme would deliver the following major regeneration benefits:
- 22 new social rent residential units to the borough's housing stock;
 - 100% affordable social rented housing
 - The introduction of Class E light industrial floorspace to the ground floor secured as Affordable Workspace;
 - 8 new full time equivalent jobs would be provided post development;
 - Provision of play for younger children along with communal and private amenity for residents to use and enjoy.
 - A contribution to the enhance nearby parks and open spaces within the OKROA, including delivery mechanisms secured through the Section 106;
 - 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
237. The proposals would deliver a high standard of accommodation, which would comply with the majority of the standards and principles of exemplary residential design, as set out in Southwark's residential design standards SPD. The design of the development, and the small number of cores per floor enables all units within the scheme to be either dual or triple 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 within the courtyard on the ground floor level and the one eighth floor terrace
238. The proposed development would reduce car dependency whilst significantly increasing cycle provision within the development. The increased width of the public footway along both frontages is anticipated to significantly enhance the public realm and improve the pedestrian experience through comfort and circulation when entering, visiting or moving past the site.
239. 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. Furthermore, in many cases, where the results would not satisfy the BRE Guidelines, the retained levels would be within the range considered acceptable for an urban location.

240. The architectural design is considered to be of high quality and would significantly improve the site within the context of the surrounding area
241. It is therefore recommended that planning permission be granted subject to conditions, referral to the Mayor of London, and the agreement of a Section 106 Legal Agreement under the terms as set out above.

Statement of community involvement

242. Consultation was carried out by the applicant prior to the submission of the planning, and during the consideration of the application. The consultation undertaken was carried out with the local community and key stakeholders from the area. This is summarised in the tables below, which are taken from the submitted Engagement Summary Document.

Table: List of meetings

Meeting	Date	Attendees	Summary of discussions
Further Southwark pre-application meeting	24 June 2021	Council officers, Pocket and Design Team (for both 2-10 Ossory Road and Credon House schemes)	The revised proposals v presented to Officers for both Ossory Road site and the Cre House site which are proposed to be linked scheme provide a mix of ma discounted market (intermediate) and social housing. The principle of linked applications was suppce by Officers, as was the provisio a mix of tenures. Overall, amended scheme at Cre House was very well receiver Officers, with support expres for the overall affordable hou offer and the provision of s social rented housing at Cre House. The Council welcomed the reduction in he in comparison to the prev scheme, and the provision private amenity space for e home.

Table: List of public consultation events carried out

Public consultation event	Date	Attendees	Summary of feedback
Public exhibition	10 July 2018 (date chosen to avoid school holiday period)	Approximately 12 individuals	Members of the public were invited to the Links Community Centre, where a series of boards were presented. The boards introduced Pocket - the affordable homes it delivers and the proposed scheme. Those who attended very supportive of the scheme and especially the provision of affordable homes.
Public exhibition	22 July 2019 (date chosen to avoid school holiday period)	Approximately 12 individuals	Members of the public were invited to the Links Community Centre, where a series of boards were presented. The boards introduced Pocket - the affordable homes it delivers and the proposed scheme. Those who attended were largely supportive of the scheme and were interested in purchasing one of the proposed homes.
Online webinar event	28 July 2021	<p>Invitations were sent to 4,872 local residents and businesses. Specific invitations were sent to:</p> <ul style="list-style-type: none"> • Ward Councillors • Vital OKR • Capital Industries • Small Beer Company • Pocket registrants in Southwark <p>14 people attended the virtual consultation and were able to ask questions throughout and after the</p>	<p>Given the Covid-19 pandemic, this public consultation event was held virtually. Members of the public were presented with an overview of Pocket Living and their delivery of affordable homes alongside details of the proposals and scheme drawings for the revised schemes at 2-10 Ossory Road and Credon House. Members of the design team included Pocket Living, Gort Scott and Hawkins Brown.</p> <p>A Q&A session was held with questions asked about outdoor amenity space, noise impacts, affordability, design and the provision of light industrial space. A recording of the webinar has been posted on the website (details below).</p>

presentation via a chat forum. Questions were then answered by Pocket and the design team.

Public website	First available on 16 July 2021 (website is still live)	Details of the website were included on the invites sent to local residents and businesses inviting them to attend the webinar.	<p>A dedicated consultation website has been set up and can be found at https://pocketoldkentroad.com/. The consultation website provides visitors with the option to view the consultation webinar and submit feedback via an online survey. To date 29 responses have been received from the online survey. The written feedback is strongly positive and can be summarised as follows:</p> <ul style="list-style-type: none"> • Welcoming provision of affordable homes which will be of particular benefit to younger people in London • Requesting more information on how one would purchase a Pocket Home (at Ossory Road) • Supportive of the delivery of 50% affordable homes across the two schemes • Welcoming the opportunity for Southwark residents to buy their own homes (at Ossory Road), it was considered more developments like this were needed • Supportive of the delivery of high-quality amenity space to encourage social interaction between residents
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Consultations

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

Consultation replies

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

SUMMARY OF CONSULTATION RESPONSES

245. This application was subject to a round of statutory consultation in September 2021.
246. At the time of writing, a total of 25 consultation responses had been received from members of the public comprising of nine responses in objection, 14 in support, and two neutral comments.
247. The main issue raised by residents objecting to the proposed development are:
- Loss of light and privacy to existing residential properties
 - Greater stress on car parking in the area
 - Development too high
 - Disproportionate building on parcel of land.
248. Officer response: Issues relating to daylight/sunlight, transport and the design and height of the building have been addressed in the report above.
249. Responses in support of the development highlighted the following:
- Delivery of affordable housing
 - Building height and design compliant with masterplan
 - On-site communal amenity is beneficial to future residents.
250. Neutral responses submitted raised the following comments
- Concern over how construction will be managed
 - The development will benefit from a biodiverse roof.
251. Officer response: A Construction Environmental Management Plan has been secured in condition as well as in the S106 to ensure noise and safety of surrounding residents is maintained during the construction of the development, The Council's Ecology Officer's recommended conditions have been added to the decision notice.

GLA

252. The GLA's Stage 1 response considers the principle of development and proposed land uses to be appropriate and generally in compliance with London Plan policies. The design is also considered acceptable. However, the report also raises a few issues whereby more information was required at the planning application stage. Through the application process, these have been addressed, as set out below.

253. Whole Life Carbon: A condition requiring the submission of post-construction assessments of the development's actual WLC emissions will be required.
254. Officer response: A condition regarding a post assessment WLC has been attached to the decision notice.
255. Circular Economy Statement: The applicant should therefore submit a circular economy statement in line with GLA guidance.
256. Officer Response: A Circular Economy Statement was submitted, and is contained within the Sustainability Statement. An assessment of this has been undertaken for this report. Whilst no conditions regarding any further Circular Economy information has been attached to this decision, the GLA has the right to recommend the attachment of such a condition, should they deem it necessary, when the application is taken to Stage 2.
257. Cycle parking: The quantum of cycle parking is in accordance with the minimum numerical standards identified in Policy T5 of the London Plan, but the proposals are currently not in accordance with London Cycle Design Standards (LCDS) as prescribed by Policy T5 and should be addressed prior to the Mayor's final determination of the application.
258. Officer Response: The wording of the above grade cycle design condition attached requires the proposed cycle storage to be in line with LCDS.

TfL

259. Cycle Parking: Should be designed in accordance with London Cycle Design Standards (LCDS), which is also required as part of Policy T5.
260. Officer Response: The wording of the above grade cycle design condition attached requires the proposed cycle storage to be in line with LCDS.
261. Docking Station: an appropriate contribution towards the provision of a cycle hire docking station should be secured through the S106 agreement, along with free membership.
262. Officer Response: This is to be secured in the S106 Agreement
263. Delivery and Service Plan: A full DSP should be secured by condition in line with Policy T7 of the London Plan. This should be prepared in accordance with TfL guidance, detailing the measures that will be implemented to mitigate the impact of delivery and servicing.
264. Officer Response: The scheme is linked with the application at 2-10 Ossory Road. In this instance the bond secured by S106 for 21/AP/3246 will apply for the combined trips over both sites.

London Underground

265. No comments to make on the application.

Metropolitan Police

The Designing Out Crime Officer has advised that they met with the applicants in July 2021. From the discussion the Officer is confident that the development can achieve Secured By Design accreditation.

266. Officer response: A condition regarding the development achieving this accreditation is attached to this permission.

Natural England

267. No comments to make on the application.

Environment Agency

268. No objection to the development subject to conditions being attached to the decision.

Historic England (HE)

269. Historic England raises no objection to the scheme given that the proposed development will be of similar height to the existing Tustin Estate residential towers.

ARQIVA

270. Arqiva did not respond to the consultation letter sent to them regarding this proposed development.

Thames Water

271. On the basis of information provided, Thames Water would not have any objection to the above planning application subject to conditions and informatives.
272. With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. <https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services>.

273. The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to 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 sewerage 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 sewerage utility infrastructure.

274. Piling has the potential to significantly impact / cause failure of local underground sewerage 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 Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB
275. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
276. There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverting-our-pipes>
277. The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large->

[site/Planning-your-development/Working-near-or-diverting-](#) our-pipes. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

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

UKPN Network

279. UKPN did not respond to consultation letter

Environment Agency

280. Planning permission should only be granted with mitigating conditions including phase 2 site risk investigation, and a piling Statement is prepared before any piling commencing that demonstrates there will be no risk to groundwater flows during construction of the development.

Internal Consultees

281. The advice received from other Southwark Officers has been detailed in the relevant sections contained within this report.

Community impact statement / Equalities Assessment

282. 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.

283. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.
284. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights
285. 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

286. The subject site has been subject to the following planning applications of note which is detailed below:

17/AP/1859

‘Prior approval for the change of use from Office (Use Class B1) to Residential (Use Class C3) to form eight residential units (4 x 1bed and 4 x 2 beds).’

Decision: Prior Approval Granted

21/AP/4289

‘Prior approval notification for proposed demolition of building’

Decision: Prior Approval Required and Approved

Pre Application Advice

287. Pre-application advice was provided in advance of the submission of this application, details of which are held electronically by the Local Planning Authority under planning reference 18/EQ/0159. A number of meetings were held with the applicant and discussions centred on the provision of affordable housing, the height and massing of the scheme and the preferred ground floor use. Additionally, amenity space, quality of the residential accommodation and potential impacts upon surrounding occupiers were discussed during the pre-application stage.

Planning history of adjoining sites

288. The Council has received a number of planning applications within the vicinity of the subject site in the Old Kent Road Opportunity Area. These include the following:

289. 16/AP/5235 1 Varcoe Road

Application type: FULL

Demolition of existing building and development comprising a part six, part 7 and part eight storey building to accommodate 57 new affordable residential units (Use Class C3) and provision of flexible employment / retail space on ground floor (Use Class B1, A1-A3).

Decision: Granted with Legal Agreement (28 September 2017).

290. 17/AP/2773 Malt Street Regeneration Site, Land Bounded By Bianca Road, Latona Road, Haymerle Road, Frensham Street, and Malt Street

Application type: FULL and OUTLINE

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

Detailed Component (Phase 1):

Full planning permission for the demolition of existing buildings and structures and redevelopment of the central area for the erection of a total of four buildings, two at seven 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 five 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: Planning permission granted (30 October 2020).

291. 18/AP/0897 Ruby Triangle Site, Land bounded by Old Kent Road, Ruby Street and Sandgate Street

Application type: FULL

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

Decision: Granted planning permission (6 June 2019)

292. 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 (5 March 2019).

293. 18/AP/2895 2 Varcoe Road

Application Type: FULL

Demolition of existing buildings and erection of a new mixed use development comprising a part 7, part nine-storey (maximum height above ground of 29.99m) building of 288sqm commercial floor space (Use Class B1) and 74 residential dwellings (Use Class C3) with associated bin stores, cycle stores, plant rooms and hard and soft 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.

Decision: Granted planning permission (11 March 2020)

Planning policy

294. The statutory development plans for the Borough comprise the National Planning Policy Framework 2021, London Plan 2021, 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

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

- The Old Kent Road Opportunity Area;
 - Draft OKR AAP site OKR 13;
 - Preferred Industrial Location - Strategic
 - The Urban Density Zone;
 - Bermondsey Lake Archaeological Priority Zone;
 - The Air Quality Management Area;
 - Public Transport Accessibility Level (PTAL) of 2;
 - Extended background area (Wider Setting Consultation Area) of LVMF views 2A.1, 3A.1, and 6A.1 and
 - Flood Zone 3.
296. 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

297. The revised National Planning Policy Framework ('NPPF') was published in July 2021 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.
298. Paragraph 218 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.
299. 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

300. National Planning Policy Guidance (2014) is a web-based resource which brings together planning guidance on various topics into one place.

London Plan 2021

301. On 2 March 2021, the Mayor of London published the London Plan 2021. The spatial development strategy sets a strategic framework for planning in Greater London and forms part of the statutory Development Plan for Greater London. The relevant policies are:
302. Policy SD1 - Opportunity Areas
 Policy SD2 - Collaboration in the Wider South East
 Policy SD3 - Growth locations in the Wider South East and beyond
 Policy SD6 - Town centres and high streets
 Policy SD7 - Town centres: development principles and Development Plan Documents
 Policy SD10 - Strategic and local regeneration
 Policy D1 - London's form, character and capacity for growth
 Policy D2 - Infrastructure requirements for sustainable densities
 Policy D3 - Optimising site capacity through the design-led approach
 Policy D4 - Delivering good design
 Policy D5 - Inclusive design
 Policy D6 - Housing quality and standards
 Policy D7 - Accessible housing
 Policy D9 - Tall buildings
 Policy D11 - Safety, security and resilience to emergency
 Policy D12 - Fire safety
 Policy D13 - Agent of Change
 Policy D14 - Noise
 Policy H1 - Increasing housing supply
 Policy H2 - Small sites
 Policy H4 - Delivering affordable housing
 Policy H5 - Threshold approach to applications
 Policy H6 - Affordable housing tenure
 Policy H7 - Monitoring of affordable housing
 Policy H9 - Ensuring the best use of stock
 Policy H10 - Housing size mix
 Policy H11 - Build to Rent
 Policy S1 - Developing London's social infrastructure
 Policy S4 - Play and informal recreation
 Policy E1 - Offices
 Policy E2 - Providing suitable business space

Policy E3 - Affordable workspace
 Policy E9 - Retail, markets and hot food takeaways
 Policy E11 - Skills and opportunities for all
 Policy HC3 - Strategic and Local Views
 Policy HC4 - London View Management Framework
 Policy G1 - Green infrastructure
 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 6 - Digital connectivity infrastructure
 Policy SI 7 - Reducing waste and supporting the circular economy
 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 T6.5 - Non-residential disabled persons parking
 Policy T7 - Deliveries, servicing and construction
 Policy T9 - Funding transport infrastructure through planning

303. The London Plan 2021 identifies the Old Kent Road as an Opportunity Area with significant potential for residential and employment development with an indicative capacity for 12,000 new homes and 5,000 new jobs. Opportunity Areas are described in the London Plan (2021) are identified as significant locations with development capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility.

Mayoral SPGs

304. The following Mayoral SPGs are relevant to the consideration of this application:
305. Homes for Londoners (2017)
 London View Management Framework (2012)
 London's World Heritage Sites SPG (2012)
 Use of planning obligations in the funding of Crossrail (2010)
 Affordable Housing and Viability SPG (2017)

Core Strategy 2011

306. The Core Strategy was adopted in 2011 providing the spatial planning strategy for the borough. The strategic policies in the Core Strategy are relevant

alongside the saved Southwark Plan (2007) policies. The relevant policies of the Core Strategy 2011 are:

Strategic policy 1 - Sustainable development
 Strategic policy 2 - Sustainable transport
 Strategic policy 3 - Shopping, leisure and entertainment
 Strategic policy 5 - Providing new homes
 Strategic policy 6 - Homes for people on different incomes
 Strategic policy 10 - Jobs and businesses
 Strategic policy 12 - Design and conservation
 Strategic policy 13 - High environmental standards
 Strategic policy 14 - Implementation and delivery

Southwark Plan 2007 (July) - Saved Policies

307. 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 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)

308. 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)

Heritage SPD (2021)

Emerging Planning Policy

New Southwark Plan

309. The New Southwark Plan is now at an advanced stage. The New Southwark Plan (NSP) was submitted to the Secretary of State in January 2020. The Examination in Public (EiP) for the NSP took place between February and April 2021. The Inspectors wrote a post hearings letter on 28 May 2021 and under Section 20(7)(c) of the Planning and Compulsory Purchase Act (2004) the Council asked the Inspectors to recommend Main Modifications to ensure the Plan is sound. The Council consulted on the Main Modifications as recommended by the Inspectors from 6 August 2021 to 24 September 2021.

It is anticipated that the plan will be adopted in February 2022 and will replace the saved policies of the 2007 Southwark Plan, the 2011 Core Strategy, the Aylesbury Area Action Plan 2010, the Peckham and Nunhead Area Action Plan 2014 and the Canada Water Area Action Plan 2015.

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)

310. 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 five years, with a first draft published in 2016. The December 2020 draft version was

consulted on from 11 January 2021 to 10 May 2021. As the document is still in draft form, it can only be attributed limited weight.

311. 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 13 which covers the area bounded by Verney Road and Sandgate Road. Requirements for this allocation site include the introduction of mixed-use developments to the north of the site allocation where the subject site is located.

ENVIRONMENTAL IMPACT ASSESSMENT

312. 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

313. 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.
314. 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

315. N/A

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file - 2354-58 Application file: 21AP3247 Southwark Local Development Framework and Development Plan Documents	Place and Wellbeing Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 1513 Council website: www.southwark.gov.uk

APPENDICES

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

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth		
Report Author	Troy Davies, Team Leader		
Version	Final		
Dated	18 January 2022		
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		20 January 2022	

APPENDIX 1**Consultation undertaken****Site notice date:** 22/09/2021**Press notice date:** 23/09/2021**Case officer site visit date:** n/a**Neighbour consultation letters sent:** 14/09/2021**Internal services consulted**

Transport Policy
 Archaeology
 Local Economy
 Ecology
 Highways Development and Management
 Highways Licensing
 Flood Risk Management & Urban Drainage
 Urban Forester
 Public Health
 Waste Management
 Environmental Protection
 Community Infrastructure Levy Team

Statutory and non-statutory organisations

Arqiva
 Environment Agency
 Greater London Authority
 Health and Safety Executive
 Historic England
 London Fire & Emergency Planning Authority
 Natural England - London & South East
 Metropolitan Police Service (Designing Out Crime)
 Transport for London
 Thames Water
 Vital OKR

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

Transport Policy

Archaeology

Design and Conservation Team [Formal]

Local Economy

Ecology

Highways Development and Management

Flood Risk Management & Urban Drainage

Urban Forester

Waste Management

Environmental Protection

Community Infrastructure Levy Team

Statutory and non-statutory organisations

Environment Agency

Greater London Authority

Health and Safety Executive

Heritage England

Metropolitan Police Service (Designing OUT Crime)

Thames Water

Transport for London

Neighbour and local groups consulted:

The Occupier	10 Ryder Drive, London, Southwark
The Occupier	Flat 2, Arundel Court, 82 Verney Road
The Occupier	405 Crown Place Apartments, 20 Varcoe Road, London

The Occupier	9 Ryder Drive, London, Southwark
The Occupier	Flat 27, Batwa House, Varcoe Road
The Occupier	13 Barkworth Road, London, Southwark
The Occupier	502 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	Flat 35, Arundel Court, 82 Verney Road
The Occupier	42 Credon Road, London, Southwark
The Occupier	Flat 4, 43 Credon Road, London
The Occupier	Flat 1, 43 Credon Road, London
The Occupier	Flat 23, Arundel Court, 82 Verney Road
The Occupier	Flat 4, 4 Eagle Close, London
The Occupier	12 St Andrews Close, London, Southwark
The Occupier	107 Verney Road, London, Southwark
The Occupier	Flat 20, Batwa House, Credon Road
The Occupier	Flat 6, 6 Varcoe Road, London
The Occupier	Second Floor, Credon House, Verney Road
The Occupier	106 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	Flat 40, Batwa House, Varcoe Road
The Occupier	West, Newton House, 60-62 Verney Road
The Occupier	Flat 2, 43 Credon Road, London
The Occupier	Flat 3, 4 Eagle Close, London
The Occupier	6 Gerards Close, London, Southwark
The Occupier	2 Gerards Close, London, Southwark
The Occupier	16 Muirfield Close, London, Southwark
The Occupier	3 Ryder Drive, London, Southwark
The Occupier	Flat 2, 101 Verney Road, London
The Occupier	105 Verney Road, London, Southwark
The Occupier	Flat 2, 11 Barkworth Road, London
The Occupier	3 Barkworth Road, London, Southwark
The Occupier	Flat 28, Batwa House, Varcoe Road
The Occupier	4 Varcoe Road, London, Southwark
The Occupier	501 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	408 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	309 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	307 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	302 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	Flat 39, Batwa House, Varcoe Road
The Occupier	17 St Andrews Close, London, Southwark
The Occupier	Flat 16, Arundel Court, 82 Verney Road
The Occupier	104 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	Flat 5, 11 Barkworth Road, London
The Occupier	14 Turnberry Close, London, Southwark
The Occupier	66 Verney Road, London, Southwark
The Occupier	8 Muirfield Close, London, Southwark
The Occupier	8 St Andrews Close, London, Southwark
The Occupier	Flat 24, Batwa House, Varcoe Road
The Occupier	Flat 3, 101 Verney Road, London
The Occupier	Flat 40, Arundel Court, 82 Verney Road
The Occupier	Flat 17, Arundel Court, 82 Verney Road

The Occupier	17 Turnberry Close, London, Southwark
The Occupier	5 Barkworth Road, London, Southwark
The Occupier	17 Muirfield Close, London, Southwark
The Occupier	Flat 4, 1 Barkworth Road, London
The Occupier	Flat 1, 1 Barkworth Road, London
The Occupier	19 Barkworth Road, London, Southwark
The Occupier	Flat 11, Batwa House, Credon Road
The Occupier	Flat 34, Batwa House, Varcoe Road
The Occupier	409 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	Flat 12, Batwa House, Credon Road
The Occupier	Flat 9, Batwa House, Credon Road
The Occupier	Flat 7, Batwa House, Credon Road
The Occupier	Flat 9, 6 Varcoe Road, London
The Occupier	201 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	Flat 29, Arundel Court, 82 Verney Road
The Occupier	Flat 18, Arundel Court, 82 Verney Road
The Occupier	Flat 14, Arundel Court, 82 Verney Road
The Occupier	15 Barkworth Road, London, Southwark
The Occupier	74 Bramcote Grove, London, Southwark
The Occupier	88 Varcoe Road, London, Southwark
The Occupier	3 Muirfield Close, London, Southwark
The Occupier	15 Turnberry Close, London, Southwark
The Occupier	9 Turnberry Close, London, Southwark
The Occupier	8 Turnberry Close, London, Southwark
The Occupier	13 St Andrews Close, London, Southwark
The Occupier	5 Ryder Drive, London, Southwark
The Occupier	103 Verney Road, London, Southwark
The Occupier	Flat 5, 101 Verney Road, London
The Occupier	9 Barkworth Road, London, Southwark
The Occupier	Flat 6, 1 Barkworth Road, London
The Occupier	32-40 Verney Road, London, Southwark
The Occupier	Flat 16, Batwa House, Credon Road
The Occupier	Flat 21, Batwa House, Credon Road
The Occupier	403 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	207 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	103 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	Flat 44, Batwa House, Varcoe Road
The Occupier	47 Credon Road, London, Southwark
The Occupier	1A Varcoe Road, London, Southwark
The Occupier	12 Muirfield Close, London, Southwark
The Occupier	Flat 5, Arundel Court, 82 Verney Road
The Occupier	3 Turnberry Close, London, Southwark
The Occupier	Flat 19, Arundel Court, 82 Verney Road
The Occupier	12 Ryder Drive, London, Southwark
The Occupier	1 Eagle Close, London, Southwark
The Occupier	Flat 31, Arundel Court, 82 Verney Road
The Occupier	Flat 28, Arundel Court, 82 Verney Road
The Occupier	Flat 25, Arundel Court, 82 Verney Road

The Occupier	4 Ryder Drive, London, Southwark
The Occupier	14 Muirfield Close, London, Southwark
The Occupier	10 Muirfield Close, London, Southwark
The Occupier	13 Turnberry Close, London, Southwark
The Occupier	10 Turnberry Close, London, Southwark
The Occupier	19 St Andrews Close, London, Southwark
The Occupier	208 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	206 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	203 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	58 Verney Road, London, Southwark
The Occupier	Flat 9, 8 Varcoe Road, London
The Occupier	Unit 59, 42-72 Verney Road, London
The Occupier	5 Gerards Close, London, Southwark
The Occupier	3 Gerards Close, London, Southwark
The Occupier	10 St Andrews Close, London, Southwark
The Occupier	4 St Andrews Close, London, Southwark
The Occupier	107A Verney Road, London, Southwark
The Occupier	Flat 1, 7 Barkworth Road, London
The Occupier	Flat 5, 1 Barkworth Road, London
The Occupier	Flat 1, 8 Varcoe Road, London
The Occupier	Flat 1, 6 Varcoe Road, London
The Occupier	Flat 31, Batwa House, Varcoe Road
The Occupier	G07, Crown Place Apartments, 20 Varcoe Road
The Occupier	G06, Crown Place Apartments, 20 Varcoe Road
The Occupier	304 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	209 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	62 Verney Road, London, Southwark
The Occupier	East, Newton House, 60-62 Verney Road
The Occupier	44 Credon Road, London, Southwark
The Occupier	4 Gerards Close, London, Southwark
The Occupier	Part First Floor, Credon House, Verney Road
The Occupier	80 Verney Road, London, Southwark
The Occupier	Flat 18, Batwa House, Credon Road
The Occupier	Flat 2, 4 Eagle Close, London
The Occupier	113 Verney Road, London, Southwark
The Occupier	Flat 8, Arundel Court, 82 Verney Road
The Occupier	Flat 39, Arundel Court, 82 Verney Road
The Occupier	5 St Andrews Close, London, Southwark
The Occupier	2 St Andrews Close, London, Southwark
The Occupier	4 Muirfield Close, London, Southwark
The Occupier	82 Varcoe Road, London, Southwark
The Occupier	68 Bramcote Grove, London, Southwark
The Occupier	62 Bramcote Grove, London, Southwark
The Occupier	Flat 19, Batwa House, Credon Road
The Occupier	308 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	303 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	42 Verney Road, London, Southwark
The Occupier	Flat 38, Batwa House, Varcoe Road

The Occupier	Flat 25, Batwa House, Credon Road
The Occupier	Flat 34, Arundel Court, 82 Verney Road
The Occupier	Flat 32, Arundel Court, 82 Verney Road
The Occupier	Flat 30, Arundel Court, 82 Verney Road
The Occupier	Flat 21, Arundel Court, 82 Verney Road
The Occupier	6 Eagle Close, London, Southwark
The Occupier	3 Eagle Close, London, Southwark
The Occupier	32 Verney Road, London, Southwark
The Occupier	2 Varcoe Road, London, Southwark
The Occupier	11 Muirfield Close, London, Southwark
The Occupier	2 Muirfield Close, London, Southwark
The Occupier	5 Turnberry Close, London, Southwark
The Occupier	2 Turnberry Close, London, Southwark
The Occupier	1 Turnberry Close, London, Southwark
The Occupier	14 Ryder Drive, London, Southwark
The Occupier	13 Ryder Drive, London, Southwark
The Occupier	11 Ryder Drive, London, Southwark
The Occupier	9 St Andrews Close, London, Southwark
The Occupier	Flat 1, Arundel Court, 82 Verney Road
The Occupier	9A Barkworth Road, London, Southwark
The Occupier	Flat 4, 8 Varcoe Road, London
The Occupier	Flat 3, 8 Varcoe Road, London
The Occupier	Flat 4, 6 Varcoe Road, London
The Occupier	Flat 14, Batwa House, Credon Road
The Occupier	Flat 33, Batwa House, Varcoe Road
The Occupier	Flat 22, Batwa House, Varcoe Road
The Occupier	G04, Crown Place Apartments, 20 Varcoe Road
The Occupier	305 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	Flat 42, Batwa House, Varcoe Road
The Occupier	Flat 8, 6 Varcoe Road, London
The Occupier	Flat 45, Batwa House, Varcoe Road
The Occupier	84 Varcoe Road, London, Southwark
The Occupier	70-72 Verney Road, London, Southwark
The Occupier	41 Credon Road, London, Southwark
The Occupier	46-50 Verney Road, London, Southwark
The Occupier	Flat 9, Arundel Court, 82 Verney Road
The Occupier	48 Credon Road, London, Southwark
The Occupier	Flat 33, Arundel Court, 82 Verney Road
The Occupier	76 Bramcote Grove, London, Southwark
The Occupier	5 Eagle Close, London, Southwark
The Occupier	8 Ryder Drive, London, Southwark
The Occupier	52-56 Verney Road, London, Southwark
The Occupier	1 Gerards Close, London, Southwark
The Occupier	G02, Crown Place Apartments, 20 Varcoe Road
The Occupier	407 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	402 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	34-36 Verney Road, London, Southwark
The Occupier	Flat 6, Arundel Court, 82 Verney Road

The Occupier	Flat 27, Arundel Court, 82 Verney Road
The Occupier	Flat 24, Arundel Court, 82 Verney Road
The Occupier	Flat 13, Arundel Court, 82 Verney Road
The Occupier	45 Credon Road, London, Southwark
The Occupier	50 Credon Road, London, Southwark
The Occupier	60 Bramcote Grove, London, Southwark
The Occupier	70 Bramcote Grove, London, Southwark
The Occupier	86 Varcoe Road, London, Southwark
The Occupier	15 Muirfield Close, London, Southwark
The Occupier	1 Muirfield Close, London, Southwark
The Occupier	11 St Andrews Close, London, Southwark
The Occupier	3 St Andrews Close, London, Southwark
The Occupier	1 Ryder Drive, London, Southwark
The Occupier	105A Verney Road, London, Southwark
The Occupier	Flat 37, Batwa House, Varcoe Road
The Occupier	Flat 36, Batwa House, Varcoe Road
The Occupier	406 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	204 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	68 Verney Road, London, Southwark
The Occupier	205 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	G01, Crown Place Apartments, 20 Varcoe Road
The Occupier	Flat 23, Batwa House, Varcoe Road
The Occupier	15 Ryder Drive, London, Southwark
The Occupier	Flat 12, Arundel Court, 82 Verney Road
The Occupier	Flat 3, 7 Barkworth Road, London
The Occupier	16 Turnberry Close, London, Southwark
The Occupier	G08, Crown Place Apartments, 20 Varcoe Road
The Occupier	301 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	Flat 15, Batwa House, Credon Road
The Occupier	Flat 35, Batwa House, Varcoe Road
The Occupier	Flat 3, 6 Varcoe Road, London
The Occupier	38-40 Verney Road, London, Southwark
The Occupier	Flat 38, Arundel Court, 82 Verney Road
The Occupier	Flat 11, Arundel Court, 82 Verney Road
The Occupier	46 Credon Road, London, Southwark
The Occupier	9 Muirfield Close, London, Southwark
The Occupier	6 Muirfield Close, London, Southwark
The Occupier	11 Turnberry Close, London, Southwark
The Occupier	18 St Andrews Close, London, Southwark
The Occupier	6 Ryder Drive, London, Southwark
The Occupier	Flat 4, 101 Verney Road, London
The Occupier	Flat 1, 101 Verney Road, London
The Occupier	Flat 8, 8 Varcoe Road, London
The Occupier	Flat 7, 8 Varcoe Road, London
The Occupier	Flat 5, 8 Varcoe Road, London
The Occupier	Flat 13, Batwa House, Credon Road
The Occupier	Flat 5, Batwa House, Credon Road
The Occupier	107 Crown Place Apartments, 20 Varcoe Road, London

The Occupier	G10, Crown Place Apartments, 20 Varcoe Road
The Occupier	G09, Crown Place Apartments, 20 Varcoe Road
The Occupier	101 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	2 Eagle Close, London, Southwark
The Occupier	210 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	7 Muirfield Close, London, Southwark
The Occupier	7 Turnberry Close, London, Southwark
The Occupier	G05, Crown Place Apartments, 20 Varcoe Road
The Occupier	1 St Andrews Close, London, Southwark
The Occupier	Flat 15, Arundel Court, 82 Verney Road
The Occupier	Flat 1, 11 Barkworth Road, London
The Occupier	16 St Andrews Close, London, Southwark
The Occupier	306 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	102 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	Flat 30, Batwa House, Varcoe Road
The Occupier	Flat 6, 8 Varcoe Road, London
The Occupier	Flat 26, Arundel Court, 82 Verney Road
The Occupier	Flat 10, Arundel Court, 82 Verney Road
The Occupier	Flat 5, 4 Eagle Close, London
The Occupier	7 Eagle Close, London, Southwark
The Occupier	52 Credon Road, London, Southwark
The Occupier	17 Barkworth Road, London, Southwark
The Occupier	13 Muirfield Close, London, Southwark
The Occupier	7 Ryder Drive, London, Southwark
The Occupier	Flat 2, 7 Barkworth Road, London
The Occupier	Flat 3, 1 Barkworth Road, London
The Occupier	Flat 7, 6 Varcoe Road, London
The Occupier	Flat 5, 6 Varcoe Road, London
The Occupier	Flat 2, 6 Varcoe Road, London
The Occupier	Ground Floor And Part First Floor, Credon House, Verney Road
The Occupier	Flat 10, Batwa House, Credon Road
The Occupier	Flat 8, Batwa House, Credon Road
The Occupier	Flat 25, Batwa House, Varcoe Road
The Occupier	60-61 Verney Road, London, Southwark
The Occupier	410 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	401 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	202 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	105 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	Flat 41, Batwa House, Varcoe Road
The Occupier	211 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	Ground Floor, 1 Varcoe Road, London
The Occupier	Flat 3, 43 Credon Road, London
The Occupier	Flat 6, 4 Eagle Close, London
The Occupier	Flat 3, Batwa House, Credon Road
The Occupier	Flat 1, 4 Eagle Close, London
The Occupier	Flat 43, Batwa House, Varcoe Road
The Occupier	111 Verney Road, London, Southwark
The Occupier	Flat 3, 11 Barkworth Road, London

The Occupier	Flat 6, 101 Verney Road, London
The Occupier	Flat 20, Arundel Court, 82 Verney Road
The Occupier	Flat 3, Arundel Court, 82 Verney Road
The Occupier	Flat 36, Arundel Court, 82 Verney Road
The Occupier	74 Varcoe Road, London, Southwark
The Occupier	Flat 4, 11 Barkworth Road, London
The Occupier	6 Turnberry Close, London, Southwark
The Occupier	404 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	Flat 4, Batwa House, Credon Road
The Occupier	Flat 32, Batwa House, Varcoe Road
The Occupier	Flat 1, Batwa House, Varcoe Road
The Occupier	Flat 2, 8 Varcoe Road, London
The Occupier	Flat 7, Arundel Court, 82 Verney Road
The Occupier	Flat 4, Arundel Court, 82 Verney Road
The Occupier	Flat 37, Arundel Court, 82 Verney Road
The Occupier	Flat 22, Arundel Court, 82 Verney Road
The Occupier	80 Varcoe Road, London, Southwark
The Occupier	78 Varcoe Road, London, Southwark
The Occupier	76 Varcoe Road, London, Southwark
The Occupier	Allard House, 18 Verney Road, London
The Occupier	72 Bramcote Grove, London, Southwark
The Occupier	66 Bramcote Grove, London, Southwark
The Occupier	64 Bramcote Grove, London, Southwark
The Occupier	5 Muirfield Close, London, Southwark
The Occupier	12 Turnberry Close, London, Southwark
The Occupier	4 Turnberry Close, London, Southwark
The Occupier	15 St Andrews Close, London, Southwark
The Occupier	14 St Andrews Close, London, Southwark
The Occupier	7 St Andrews Close, London, Southwark
The Occupier	6 St Andrews Close, London, Southwark
The Occupier	2 Ryder Drive, London, Southwark
The Occupier	64 Verney Road, London, Southwark
The Occupier	109 Verney Road, London, Southwark
The Occupier	Flat 2, 1 Barkworth Road, London
The Occupier	Flat 6, Batwa House, Credon Road
The Occupier	Flat 2, Batwa House, Credon Road
The Occupier	Flat 29, Batwa House, Varcoe Road
The Occupier	Flat 26, Batwa House, Varcoe Road
The Occupier	Flat 17, Batwa House, Credon Road
The Occupier	108 Crown Place Apartments, 20 Varcoe Road, London
The Occupier	G03, Crown Place Apartments, 20 Varcoe Road
The Occupier	10 Varcoe Road, London, Southwark
The Occupier	24 Batwa House, Varcoe Road, London
The Occupier	Flat 34 Batwa House, Rotherhithe, SE16 3BF
The Occupier	14C Wilson Road, Camberwell, London
The Occupier	Flat 41, Batwa House, Varcoe Road, London
The Occupier	15 Pelier Street, London, SE17 3JG
The Occupier	17 Relf Road, London, SE15 4JS

The Occupier	Apartment 32, 2 Woods Road, London
The Occupier	42, Batwa House, Varcoe Eoad, London
The Occupier	44 Radnor Road, SE15 6UR, ,
The Occupier	6 Tortington House,, Bird In Bush Road,, Friary Estate,
The Occupier	Apartment 54, 1 Varcoe Road, London
The Occupier	86 Penton Place, Flat A, Walworth, London
The Occupier	88 Union Street, SE10NW, SE10NW
The Occupier	7 Wilmot Close, Peckham, London
The Occupier	FLAT 32, BATWA HOUSE, VARCOE ROAD, LONDON
The Occupier	Flat 40 Batwa House, Varcoe Road, London
The Occupier	1 Batwa House, London, SE16 3DE
The Occupier	44 Batwa House, Varcoe Road, London
The Occupier	Lecturer In French, King's College London, 57 Waterloo Road,
The Occupier	33 Langdale Close, London, SE17 3UF
The Occupier	Sumner House , Sumner Road, SE15 5QS
The Occupier	Flat 28, Batwa House, Varcoe Road, LONDON
The Occupier	30 Monmouth Court, Coopers Road, London
The Occupier	126 Crystal Palace Road, London, SE22 9ER

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	CREDON HOUSE LIMITED	Reg. Number	
Application Type	Full Planning Application		
Recommendation	Grant subject to Legal Agreement	Case Number	21/AP/3247

Draft of Decision Notice

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

Demolition of existing building and construction of a nine storey building (32.30m AOD) comprising up to 82sqm of Class E floorspace at ground floor and up to 22 homes (Class C3). Provision of ancillary plant, amenity spaces, cycles and refuse 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: CREDON HOUSE, VERNEY ROAD, London SE16 3BA

In accordance with application received on 14/09/2021

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

117 GS-XX-XX-DR-A 2000 REV PL 01 - PROPOSED SITE LOCATION PLAN

117 GS-XX-00-DR-A 2050 REV PL 01 - PROPOSED BLOCK PLAN

117 GS-XX-00-DR-A 2100 REV PL 01 - PROPOSED GROUND FLOOR PLAN

117 GS-XX-01-DR-A 2101 REV PL 01 - PROPOSED LEVEL 01 FLOOR PLAN

117 GS-XX-02-DR-A 2102 REV PL 01 - PROPOSED LEVEL 02 FLOOR PLAN

117 GS-XX-03-DR-A 2103 REV PL 01 - PROPOSED LEVEL 03 FLOOR PLAN

117 GS-XX-04-DR-A 2104 REV PL 01 - PROPOSED LEVEL 04 FLOOR PLAN

117 GS-XX-05-DR-A 2105 REV PL 01 - PROPOSED LEVEL 05 FLOOR PLAN

117 GS-XX-06-DR-A 2106 REV PL 01 - PROPOSED LEVEL 06 FLOOR PLAN

117 GS-XX-07-DR-A 2107 REV PL 01 - PROPOSED LEVEL 07 FLOOR PLAN

117 GS-XX-08-DR-A 2108 REV PL 01 - PROPOSED LEVEL 08 FLOOR PLAN

117 GS-XX-RF-DR-A 2109 REV PL 01 - PROPOSED ROOF PLAN

117 GS-XX-XX-DR-A 2200 REV PL 01 - PROPOSED SECTION AA

117 GS-XX-XX-DR-A 2201 REV PL 01 - PROPOSED SECTION BB

117 GS-XX-XX-DR-A 2202 REV PL 01 - PROPOSED SECTION CC

117 GS-XX-XX-DR-A 2203 REV PL 01 - PROPOSED SECTION DD

117 GS-XX-XX-DR-A 2300 REV PL 01 - PROPOSED NORTH ELEVATION

117 GS-XX-XX-DR-A 2301 REV PL 01 - PROPOSED EAST ELEVATION

117 GS-XX-XX-DR-A 2302 REV PL 01 - PROPOSED SOUTH ELEVATION

117 GS-XX-XX-DR-A 2332 REV PL 01 - PROPOSED WEST ELEVATION

Reason:

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

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

Reason:

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

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

- 3 Before any work hereby authorised begins, the applicant shall secure the implementation of a programme of archaeological evaluation works in accordance with a written scheme of investigation which 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 2021.

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

Reason:

In order that the details of the programme of works for the archaeological mitigation are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site in accordance with Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and the National Planning Policy Framework 2021.

- 5 Before any work, hereby authorised, excluding demolition to basement level, archaeological evaluation and site investigation works, begins, the applicant shall submit a detailed scheme showing the complete scope and arrangement of the basement and foundation design, and all associated subterranean groundworks, including the construction methods. The submitted documents should show how archaeological remains will be protected by a suitable mitigation strategy. The detailed scheme will need to be approved in writing by the Local Planning Authority and the development shall only be carried out in accordance with the approval given.

Reason: In order that all below ground impacts of the proposed development are known and an appropriate protection and mitigation strategy is achieved to preserve archaeological remains by record and/or 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 2021.

- 6 Prior to the commencement of development, including demolition, an updated Circular Economy Statement demonstrating compliance with Part B of Policy SI 7 'Reducing waste and supporting the circular economy' of the London Plan 2021 and including measures for monitoring and reporting against the targets within the Circular Economy Statement shall be submitted and approved in writing by the Local planning Authority. The assessment shall develop a strategy for the implementation of circular economy principles in both the approved building's and wider site's operational phase, in addition to developing an end-of-life strategy for the development according to circular economy principles, including disassembly and deconstruction.

Reason:

To promote resource conservation, waste reduction, material re-use, recycling and reduction in material being sent to land fill in compliance with Policy SI 7 of the London plan 2021.

- 7 a) Prior to the commencement of development works, an intrusive site investigation and associated risk assessment shall be completed to fully characterise the nature and extent of any contamination of soils and ground water on the site.
- b) In the event that contamination is found that presents a risk to future users or controlled waters or other receptors, a detailed remediation and/or mitigation strategy shall be prepared and submitted to the Local Planning Authority for approval in writing. The strategy shall detail

all proposed actions to be taken to bring the site to a condition suitable for the intended use together with any monitoring or maintenance requirements. The scheme shall also ensure that as a minimum, the site should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. The approved remediation scheme (if one is required) shall be carried out and implemented as part of the development.

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

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

Reason

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with saved policy 3.2 'Protection of amenity' of the Southwark Plan (2007), strategic policy 13' High environmental standards' of the Core Strategy (2011) and the National Planning Policy Framework 2021.

- 8 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:
 - o A detailed specification of demolition and construction works at each phase of development including consideration of all environmental impacts and the identified remedial measures;
 - o Site perimeter continuous automated noise, dust and vibration monitoring;
 - o 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.;

- o 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.)
- o 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 & 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'
- o BS 7385-2:1993 Evaluation and measurement for vibration in buildings. Guide to damage levels from ground-borne vibration,
- o BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings - vibration sources other than blasting,
- o 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 (2021).

- 9 No works (excluding demolition and site clearance) shall commence until full details of the proposed surface water drainage system incorporating Sustainable Drainage Systems (SuDS) have been submitted to and approved in writing by the Local Planning Authority, including detailed design, size and location of attenuation units and details of flow control measures. The strategy should achieve a reduction in surface water runoff rates during the 1% Annual Exceedance Probability (AEP) event plus climate change allowance, as detailed in the *Flood Risk Assessment* (dated 27/08/2021, rev. 01), *Drainage Strategy* (report reference. P450064-001, rev. 03, dated 27/08/2021) and *Flood Risk – Response to Planning Comments* (dated 11/01/2022, dated rev. P2) prepared by Whitby Wood. The applicant must demonstrate that the site is safe in the event of blockage/failure of the system, including consideration of exceedance flows.

Reason:

To minimise the potential for the site to contribute to surface water flooding in accordance with Southwark's Strategic Flood Risk Assessment (2017) and Policy SI 13 of the London Plan (2021).

- 10 Details of access for fire appliances as required by part 5B of the Building Regulations and details of adequate water supplies for fire fighting purposes should be provided prior to the implementation of the scheme and should be secured in perpetuity on completion of the scheme.

Reason:

To meet the requirements for fire safety set out in policy D12 of the London Plan 2021

- 11 Prior to commencement of any works (with the exception of demolition to ground level and archaeology), detailed plans shall be submitted to and approved in writing by the Local Planning Authority demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development. The development shall be carried out in accordance with the approved plans and maintained as such in perpetuity.

Reason:

To provide high quality digital connectivity infrastructure to contribute to London's global competitiveness, in accordance with: the National Planning Policy Framework 2021, and; Policy SI 6 (Digital Connectivity Infrastructure) of the London Plan 2021.

- 12 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 sewerage infrastructure, risk to groundwater, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water and the Environment Agency. 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 sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure and harm groundwater flows.

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.

- 13 Prior to the commencement of any above grade works (excluding demolition), details of bird and/or bat nesting boxes / bricks shall be submitted to and approved in writing by the Local Planning Authority. No less than six bat bricks/tubes on the eastern edge of the top floor terrace, and 12 Swift bricks the top of the eastern elevation which shall be internal and set into the wall shall be provided and the details shall include the exact location, specification and design of the habitats. The tubes 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 tubes shall be installed 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 tube features and mapped locations and Southwark Council agreeing the submitted plans. A post completion assessment will be required to confirm the terrace/tube features have been installed to the agreed specification.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with policies: G6 of the London Plan

2021, Policy 3.28 of the Southwark Plan and Strategic Policy 11 of the Southwark Core Strategy.

- 14 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 2021, Policy D9 Tall Buildings of the London Plan 2021, 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).

- 15 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 2021, Policy D9 Tall Buildings of the London Plan 2021, 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)

- 16 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 2021, Strategic Policy 12 - Design and conservation of The Core Strategy 2011 and Saved Policy 3.14 Designing out crime of the Southwark Plan 2007.

- 17 Prior to the commencement of any above grade works (excluding demolition), details and 1:50 scale drawings of the secure cycle parking facilities in line with London Cycle Design Standards 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 2021, Policy T5 of the London Plan 2021, Strategic Policy 2 - Sustainable Transport of The Core Strategy 2011 and Saved Policy 5.3 Walking and Cycling of the Southwark Plan 2007.

- 18 Prior to the commencement of any above grade works (excluding demolition), details of the biodiversity green/brown roof shall be submitted to and approved in writing by the Local Planning Authority. The biodiversity green/brown roof 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 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 brown roof 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 G1 (Green Infrastructure) and G5 (Urban Greening) and of the London Plan 2021; Strategic Policy 11 (Design and Conservation) of the Core Strategy 2011, and; Saved Policy 3.28 (Biodiversity) of the Southwark Plan 2007.

- 19 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)(2)(a) 'wheelchair adaptable':- at least 10%

M4 (Category 2) 'accessible and adaptable dwellings':- remaining units

Reason:

In order to ensure the development complies with Core Strategy 2011 Strategic Policy 5 (Providing new homes) and London Plan 2021 Policy D7 (Accessible Housing).

20 Prior to commencement of any above grade works (excluding demolition), the following further information on the Air Source Heat pumps should be submitted and approved by the Local Planning Authority:

- The heat pump's total capacity (kWth).
- An estimate of the heating and/or cooling energy (MWh/annum) the heat pumps would provide to the development and the percentage of contribution to the site's heat loads.
- Details of how the Seasonal Coefficient of Performance (SCOP) and Seasonal Energy Efficiency ratio (SEER) has been calculated for the energy modelling. This should be based on a dynamic calculation of the system boundaries over the course of a year i.e. incorporating variations in source temperatures and the design sink temperatures (for space heat and hot water).
- Manufacturer datasheets showing performance under test conditions for the specific source and sink temperatures of the proposed development and assumptions for hours spent under changing source temperatures. Whether any additional technology is required for hot water top up and how this has been incorporated into the energy modelling assumptions.
- An estimate of the expected heating costs to occupants, demonstrating that the costs have been minimised through energy efficient design.
- The expected heat source temperature and the heat distribution system temperature with an explanation of how the difference will be minimised to ensure the system runs efficiently.
- A commitment to monitor the performance of the heat pump system post construction to ensure it is achieving the expected performance approved during planning.

Reason:

To ensure the proposal complies with The National Planning Policy Framework 2021, The London Plan 2021, 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 Prior to the commencement of any above grade works (excluding demolition), full particulars of the sprinkler system to be used within the ground floor unit 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.

- 22 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 2021, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan 2007.

- 23 Prior to the installation of any lighting, a detailed lighting strategy and design for all internal and external lighting, demonstrating compliance with the Institute of Lighting Professionals (ILP) Guidance Notes, shall be submitted to and approved by the Local Planning Authority in writing. 23.00 hrs shall be the curfew for light pollution / light spillage assessment and implementation of the approved lighting strategy. If mitigation is required to avoid harmful light pollution or light spillage it shall be implemented prior to the first use of the building and retained as such thereafter.

Reason:

In order that the Council may be satisfied as to the details of the development in the interest of the visual amenity of the area, the amenity and privacy of adjoining occupiers, and their protection from light nuisance, in accordance with The National Planning Policy Framework 2021, Strategic Policy 12 Design and Conservation and Strategic Policy 13 High environmental standards of The Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity and 3.14 Designing out crime of the Southwark Plan 2007.

- 24 Before any above grade work hereby authorised begins, detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings (including cross sections, surfacing materials of any parking, access, or pathways layouts, materials and edge details), and landscaping measures to safeguard the amenity of the two units abutting the tenth floor terrace shall be submitted to and approved in writing by the Local

Planning Authority. The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use.

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

Reason:

So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2021; Strategic Policies 11 (Open Spaces and Wildlife), 12 (Design and conservation) and 13 (High Environmental Standards) of The Core Strategy 2011, and; Saved Policies 3.2 (Protection of Amenity), 3.12 (Quality in Design) 3.13 (Urban Design) and 3.28 (Biodiversity) of the Southwark Plan 2007.

- 25 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 2021.

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.

- 26 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 2021, 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

- 27 Prior to commencement for each building details shall be submitted to and approved in writing by the local planning authority demonstrating that a minimum of at least one lift per core (or more subject to capacity assessments) will be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building. The development shall be carried out in accordance with these details and maintained as such in perpetuity.

Reason: In order to ensure that the proposed development complies with the requirements of the London Fire Brigade and Policy D12 Fire Safety of the London Plan 2021

- 28 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 and approved in writing by the Local Planning Authority. The landscape management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

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.

- 29 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. Sand and Tap play shall be incorporated into the play space design. 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 2021 Parts 5, 8, and 12, London Plan (2021) Policy S4 Play and informal recreation; 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

- 30 Before the marketing of the development to residential occupiers, details to ensure the promotion of car free living is clear to the occupiers of the development hereby permitted.

Reason:

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

- 31 No dwelling shall be occupied until a drainage verification report prepared by a suitably qualified engineer has been submitted to and approved in writing by the Local Planning Authority. The report shall provide evidence that the drainage system (incorporating SuDS) has been constructed according to the approved details and specifications (or detail any minor variations where relevant) as detailed in the *Flood Risk Assessment* (dated 27/08/2021, rev. 01), *Drainage Strategy* (report reference. P450064-001, rev. 03, dated 27/08/2021) and *Flood Risk – Response to Planning Comments* (dated 11/01/2022, dated rev. P2) prepared by Whitby Wood, and shall include plans, photographs and national grid references of key components of the drainage network such as surface water attenuation structures, flow control devices and outfalls. The report shall also include details of the responsible management company.

Reason: To ensure the surface water drainage complies with Southwark's Strategic Flood Risk Assessment and Policy SI 13 of the London Plan (2021).

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.

- 32 Vertical sound transmission between commercial and residential properties on refurbishment - standard

Party walls, floors and ceilings between the commercial premises and residential dwellings shall be designed to achieve a minimum weighted standardized level difference of 55dB DnTw+Ctr. The partition's acoustic performance 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 2021.

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

Bedrooms - 35dB LAeq T†, 30 dB L Aeq T*, 45dB LAFmax T *

Living and Dining rooms- 35dB LAeq T †

* - Night-time - 8 hours between 23:00-07:00

† - Daytime - 16 hours between 07:00-23:00

Following completion of the development and prior to occupation, a validation test shall be carried out on 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 2021.

- 34 The Rated sound level from any plant, together with any associated ducting shall not exceed the Background sound level (LA90 15min) at any noise sensitive premises. Furthermore, the plant Specific sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific sound levels shall be calculated in full accordance with the methodology of BS4142:2014 +A1:2019

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the National Planning Policy Framework 2021, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007).

- 35 Prior to the commencement of use of any food premises kitchen, full particulars and details of a scheme for the extraction and ventilation of the commercial kitchen shall be submitted to and approved by the Local Planning Authority. The scheme shall include:

- o Details of extraction rate and efflux velocity of extracted air
- o Full details of grease, particle and odour abatement plant
- o The location and orientation of the extraction ductwork and discharge terminal
- o A management \ servicing plan for maintenance of the extraction system

to ensure that fumes and odours from the kitchen do not affect public health or residential amenity. Once approved the scheme shall be implemented in full and permanently maintained thereafter.

Reason:

In order to ensure that that any installed ventilation, ducting and ancillary equipment in the interests of amenity will not cause amenity impacts such as odour, fume or noise nuisance and will not detract from the appearance of the building in accordance with The National Planning Policy Framework 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.

*Note: It is understood no kitchen is currently proposed however as the application is for unrestricted Class E use this would cover any future conversion as allowed within the use class without further consent.

- 36 Any deliveries, unloading and loading to the commercial unit 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 2021, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity of The Southwark Plan 2007.

- 37 The commercial unit 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 2021.

- 38 Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order and any associated provisions of the Town and Country Planning General Permitted Development Order (including any future amendment of enactment of those Orders), the Class E use hereby permitted shall only be for light industrial uses as detailed in the Ground Floor Plan (117 GS-XX-00-DR-A 2100 REV PL 01)

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 2021.

- 39 The development hereby permitted shall be carried out in accordance with the Fire Safety Strategy by Jensen Hughes CL5609/R1 Issue 3, dated 24th August 2021

Reason:

In order to ensure that the fire safety of the proposed development has been duly considered, as required by policy D12 'Fire safety' of the London Plan (2021).

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

Reason:

In order to ensure that no telecommunications plant or equipment which might be detrimental to the design and appearance of the building and visual amenity of the area is installed on the roof of the building in accordance with Chapter 12 (Achieving well-designed places) of the National Planning Policy Framework (2021); Policy D4 (Delivering good design) of the London Plan (2021); 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).

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

Reason:

In order to ensure that no additional plant is placed on the roof of the building in the interest of the appearance and design of the building and the visual amenity of the area in accordance with Chapter 12 (Achieving well-designed places) of the National Planning Policy Framework (2021); Policy D4 (Delivering good design) of the London Plan (2021); 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).

- 42 No meter boxes, flues, vents or pipes [other than rainwater pipes] or other appurtenances not shown on the approved drawings shall be fixed or installed on the street elevation of the building.

Reason:

To ensure such works do not detract from the appearance of the building (s) in accordance with Chapter 12 (Achieving well-designed places) the National Planning Policy Framework (2021); Policy D4 (Delivering good design) of the London Plan (2021); Strategic Policy 12 (Design and Conservation) of the Core Strategy (2011); and Saved Policies 3.12 (Quality in Design) and 3.13 (Urban Design) of the Southwark Plan (2007).

Special condition(s) - the following condition(s) are required post completion of relevant condition imposed in other sections of this decision notice

- 43 Within one year of the completion of the archaeological work on site, an assessment report detailing the proposals for the off-site analyses and post-excavation works, including publication of the site and preparation for deposition of the archive, shall be submitted to and approved in writing by the Local Planning Authority, and the works detailed in the assessment report shall not be carried out otherwise than in accordance with any such approval given. The assessment report shall provide evidence of the applicant's commitment to finance and resource these works to their completion.

Reason:

In order that the archaeological interest of the site is 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 2021.

- 44 No later than three months following substantial completion of the final residential unit within the development hereby consented, a Post Completion Circular Economy Report setting out the predicted and actual performance against all numerical targets in the relevant Planning Stage Circular Economy Statement shall be submitted to and approved in writing by the Local Planning Authority.

Reason:

To ensure that Planning Stage Circular Economy Statement has been implemented in the construction and delivery of the development, and that all on-going operational measures and mechanisms have been satisfactorily implemented, in order to achieve Circular Economy goals

and in accordance with: the National Planning Policy Framework 2021, and; Policies GG6 (Increasing Efficiency and Resilience) and SI7 (Reducing Waste and Supporting the Circular Economy) of the London Plan 2021.

- 45 Within 12 months of first occupation of the development, an updated Whole Life-Cycle (WLC) Carbon Assessment demonstrating compliance with Part F of Policy SI 2 - Minimising greenhouse gas emissions of the London Plan 2021, shall be submitted and approved in writing by the Local Planning Authority. This assessment should calculate updated whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment based on actual emissions. The updated assessment should evidence what actions have been taken in implementing the development to reduce whole life-cycle carbon emissions, including assessment and evidencing of recommendations set out in the approved Sustainability Strategy (authored by Meinhardt, dated 7th September 2021).

Reason

To maximise the reduction in greenhouse gas emissions and to minimise peak and annual energy demand in compliance with Policy SI2 of the London Plan 2021.

Informative notes to the applicant relating to the proposed development

THAMES WATER

1. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverting-our-pipes>

2. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure

your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

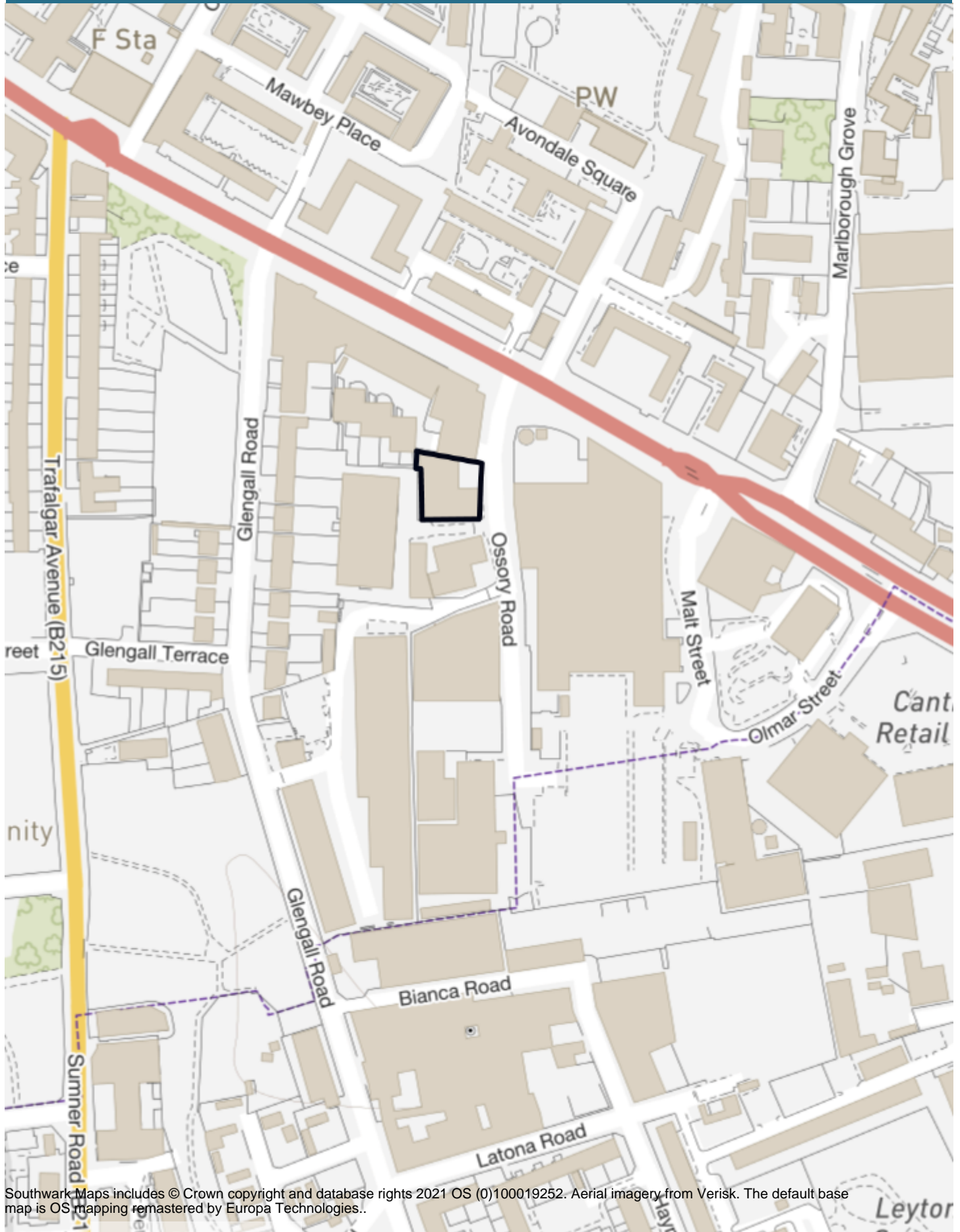
<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

Agenda Item 6.2



21/AP/3246

2-10 OSSORY ROAD, LONDON SE1 5AN



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20-Jan-2022

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Item No. 6.2	Classification: Open	Date: 2 February 2022	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 21/AP/3246 for: FULL PLANNING APPLICATION Address: 2-10 OSSORY ROAD, LONDON SE1 5PA Proposal: Demolition of the existing building and construction of a part one, part ten and part eleven storey building (42.65m AOD) comprising up to 421sqm of Class E floorspace at ground floor and up to 117 homes (Class C3). Provision of ancillary plant, amenity spaces, cycles and refuse 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 and Growth		
Application Start Date	15/09/2021	Application Expiry Date	15/12/2021
Earliest Decision Date	15/11/2021		

RECOMMENDATIONS

1. a) That planning permission be 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 2 August 2022.

 b) In the event that the requirements of (a) are not met by 2 August 2022 that the Director of Planning and Growth be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 232 of this report.

EXECUTIVE SUMMARY

POCKET LIVING

2. Pocket Living is a housing developer, supported by the Mayor of London and Homes England. Pocket specialises in delivering grant-free affordable homes for first time buyers. 117 one-bedroom homes are proposed at 2-10 Ossory Road, 39 of which will be sold at a 20% discount to local prices, to people who earn under

the GLA affordable housing income cap and who live or work in Southwark. The homes remain affordable in perpetuity and are 100% owned by purchasers. This is the second Pocket application in Old Kent Road. The first at Varcoe Road was completed in December 2019 having been granted consent in July 2017. It provides 57 affordable one bed homes. All the homes were sold to people who either lived or worked in Southwark and 82% were sold to people on or below the Southwark intermediate household income threshold. The remainder were sold at GLA household income threshold levels. A statistical breakdown of the Varcoe Road scheme is detailed below:

3. Buyer profile:

- Average age – 30
- Average household income is £44,306 (versus £47k income threshold)
- 100% of the buyers lived and/or worked in Southwark prior to buying. This is broken down as follows:
 - 46% lived in the borough
 - 35% worked in the borough
 - 19% lived and worked in the borough

Housing:

Homes	Social Rent Homes	Intermediate Homes	Market Sale Homes	Homes Total (% of total)	HR Total
1 bed	0	39	78	117 (100%)	234 (100%)
2 bed	0	0	0	0	0
3 bed	0	0	0	0	0
Total	0	39	78	117	234
(% of total)		(33.33%)	(66.67%)	(100%)	(100%)

Ossory Road and Credon House Combined Affordable Housing Offer (by unit)

Unit Size	Market Units Ossory Road	Intermediate Housing Ossory Road	Social Rent Credon House	Total
1 bed	78	39	8	125
2 bed	0	0	7	7
3 bed	0	0	7	7

Total	78	39	22	139
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Ossory Road and Credon House Combined Affordable Housing Offer
(by habitable room)

	Market Units Ossory Road	Intermediate Housing Ossory Road	Social Rent Credon House	Total
Habitable Rooms (no.)	156	78	79	313
Habitable Rooms (%)	49.8%	24.9%	25.3%	100%
Total Habitable Rooms	156 (50%)	157 (50%)		313
Units (no.)	78	39	22	-
Total Units	78	61		139

Commercial:

Use Class	Existing	Proposed	Change +/-
Class E (g, light industrial)	966 sqm	421 sqm	-545sqm
Jobs	6	Up to 12	+6

Parks and children's playspace:

	Existing sqm	Proposed sqm	Change +/-
Public Open Space	0	0	0
Play Space	0	0	0
Communal Amenity Space	0	281sqm	+281sqm
Private Amenity Space	0	420sqm	+420sqm

Environmental:

CO2 Savings beyond part L Building Regs	69.2% - domestic element 59.8% - non-domestic element
Trees lost	0
Trees gained	3

	Existing	Proposed	Change +/-
Urban Greening Factor	0	0.22542	+0.225
Surface water run off rates	54 l/s	1.47 l/s (greenfield run off rates achieved)	-52.53
Green/Brown Roofs	0sqm	280sqm	+280sqm
EVCPS (on site)	0	0	0
Cycle parking spaces	0	130	+130

CIL and S106 (Or Unilateral Undertaking):

CIL (estimated)	£1,500,399.93
MCIL (estimated)	£386,295.14
S106	<ul style="list-style-type: none"> • Contribution towards the improvement of local bus stops – up to £315,900 • CMP monitoring - £4,680 • DSP monitoring - £11,800 • TfL cycle hire docking station - £5,850 • Carbon offset - £69,540 • Archaeology - £6,778 • Open space - £226,217.50

BACKGROUND INFORMATION**Site location and description**

- The subject site is located on the western side of Ossory Road in close proximity to the junction with the Old Kent Road. The site comprises 0.11 (ha) and was formerly occupied as a showroom and maintenance garage by Robins & Day, and is currently occupied on a short term tenancy by Online Retail Company (FodaBox) in Use Class E.
- The existing building has an L-shaped footprint with concrete hardstanding at its' North-East corner fronting Ossory Road. It is constructed of blockwork walls and metal cladding and is comprised of a steel portal frame with a shallow dual pitched corrugated concrete roof and single storey lean-to on its northern boundary. The building is approximately 6.4m at eaves height and has 966 sqm of existing GIA floorspace.
- The western side of Ossory Road comprises storage and industrial warehouses home to occupiers such as Hireman Tool & Equipment Services (14-22 Ossory Road), Rexel Electrical wholesaler (50 Ossory Road) and Shurgard storage (54-80 Ossory Road) at the southern end of Ossory Road. The application site is an area where the character of Ossory Road transitions from commercial uses to the South into residential uses along its junction with the Old Kent Road. This transition is evident in the adjacent residential development of 434-452 Old Kent Road which lies immediately to the north of the subject site.
- Asda supermarket forms the entire eastern edge of Ossory Road with the store and service yard to the north and open surface car parking to the south. There is no entry to Asda's car park from Ossory Road. Servicing for Asda is via Ossory Road, opposite to the application site. To the west of the application site lies the former mineral water and ginger beer Victorian bottling factory which is locally

listed and located within the recently extended Glengall Road Conservation Area. An access road, from Ossory Road, leads into a central cobbled yard and provides service access and associated car-parking for the bottling factory.

8. Pedestrian and vehicular access into the site is via Ossory Road. The hardstanding area at the North-East corner provides seven car-parking spaces; it is predominantly used for car and service vehicle parking and refuse storage. A level access loading door and separate pedestrian access door serves the existing use along Ossory Road.

Image: site plan



9. The subject site is 1.40 kilometres from South Bermondsey Railway Station, approximately an 18 minute walk. High frequency bus routes along the Old Kent Road are within 500 metres of the site and link the area to Bakerloo line services at Elephant and Castle Underground Station and Northern, Jubilee and National Rail services at London Bridge. A manual Public Transport Accessibility Level (PTAL) assessment indicates the site has a PTAL of 4, on a scale of 1-6b with 6b being the highest, demonstrating that the site has good accessibility to public transport.
10. The Bakerloo Line Extension (BLE) project is paused subject to funding. Safeguarding still remains for the future provision of the BLE.
11. The subject site is located within Sub Area 2 (Cantium Retail Park and Marlborough Grove) and specifically Site Allocation OKR 10 of the Old Kent Road Area Action Plan (OKR AAP). In addition, the site is designated as Preferred Industrial Location-Strategic (Old Kent Road) as per Southwark's current Proposals Map and Adopted Policy. Furthermore, the site is located within an Urban Density Zone and an Air Quality Management Area. It is located in Flood Zone 3 as identified by the Environment Agency. The application site is not within a Conservation Area; however, the Glengall Road Conservation Area boundary runs to the immediate south and west of the application site.

DETAILS OF PROPOSAL

12. Planning permission is sought for the demolition of the existing buildings on site to construct a Part 1/Part 10/Part 11 storey building providing 117 one bedroom one person homes (Use Class C3) at 25% Affordable by habitable rooms, with 421sqm of Class E floorspace (light industrial), external amenity space, ancillary plant, cycle storage and refuse store.
13. The subject scheme is one of two linked applications for the redevelopment of sites within the Old Kent Road. The second application scheme is at Credon House (reference 21/AP/3247), which involves the construction of a nine storey building comprising up to 82sqm of Class E floorspace at ground floor (affordable workspace) and up to 22 homes (Class C3). Provision of ancillary plant, amenity spaces, cycles and refuse stores. The two applications are linked as this scheme will deliver the intermediate component of the two applications when considered holistically, based on a provision of 50% affordable housing by habitable room across both sites. Overall, the two linked schemes will deliver 139 homes of which 22 (25% by habitable room) will be social rent tenure and 39 (a further 25% by habitable room) will be intermediate tenure.
14. The 421sqm of Class E floorspace is proposed at ground floor level which enables the scheme to provide an active frontage at street level in keeping with the industrial character of Ossory Road. The layout of the ground floor is suitable for light industrial businesses to use the floorspace, and has been designed in line with the GLA's draft Industrial Intensification Primer Guidance (2017). The ground floor incorporates flexible and modern accommodation requirements for industrial uses to ensure efficient functionality and usability. The floorspace will have a floor to ceiling height of 4m. The light industrial unit will be serviced from Ossory Road. A fit out of the space will be secured by condition.
15. The development provides a total of 130 secure cycle parking spaces for future residents of the development and their visitors, located at ground floor. This will be provided through 118 secure, long stay spaces for residents, plus 12 visitor spaces. Two long stay cycle parking spaces will be provided for commercial users. One Sheffield stand externally in the courtyard, in the south west corner of the building, will provide 2 short stay spaces for cyclists visiting the commercial occupants.
16. The commercial and residential refuse store is located at ground floor and will be accessed via Ossory Road. The servicing for both will take place from Ossory Road. The development would be car free, secured by way of the S106 Agreement; aside from occupants of the development who are Blue Badge holders would be eligible for a Residents Parking Permit.
17. From the first floor and above, residential 1 bed 1 person units are proposed (Use Class C3) with 12 of the units being Building Regulations Part M4(3)(2)(a) wheelchair adaptable. Residents will access the units from an entrance lobby on Ossory Road. Separate access for residents and commercial users has been

incorporated into the design of the scheme and will ensure the successful co-location of uses. The residential entrance will comprise an outer lobby and inner lobby to ensure secure access and will include a stair way and two lifts.

Table: Proposed land uses

Land Use	Use Class	GIA
Residential	C3	4,935.1sqm
Light Industrial	E (g) light industrial	421sqm

18. The development provides affordable housing units which would be in the intermediate tenure for discounted sale. Two areas of external communal amenity space are proposed within the scheme. The external areas are located on the first and eleventh floors comprising of 224.4sqm and 56.8sqm on each respective floor totalling 281.2sqm. For the 78 private market units within the development, 420.3sqm of private amenity space is proposed through provision of private balconies.

Revisions and amendments

19. Whilst no design or alterations to the total number of residential units has occurred during the lifespan of this application, additional information regarding some areas of assessment was submitted. The documents were submitted in light of comments received from consultee comments. In acknowledging the further documents, the nature of the information received re-consultation of the scheme was not required.
20. The documents of additional information submitted during the course of this application were as follows:
- SUDS – Response to Planning Comment – Revision 01 dated 12/01/2022

KEY ISSUES FOR CONSIDERATION

Summary of main issues

21. 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 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

22. 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 2021, the Core Strategy 2011, and the Saved Southwark Plan 2007.
23. 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

24. 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.
25. 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.

26. Travellers are a group with protected characteristics. There is a Travellers site 285m to the south at the junction of Glengall Road and Latona Road. Given the separation distance it is considered that there would be no adverse impacts on the traveller's site. There is a church used primarily by the BAME community at the junction of Ossory Road and Old Kent Road. Whilst this is closer to the site it is not considered that the design of the building or its uses would adversely affect the operation of the church. There are no other groups with protected characteristics that would be adversely affected by the development.

Other equality impacts

27. Proposed enhancements to the streetscene of Ossory Road (Including improvements to the footpath and public realm) would prioritise the movement of pedestrians and promote "healthier, active lives" in accordance with draft Policy AAP 10 of the draft OKR AAP. Additionally, the proposed development would also provide affordable housing in a location with a high demand for such accommodation and a relatively high BAME population.

Conclusion on equality impacts

28. 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 light industrial use on site along with the introduction of C3 Residential Use to the upper floors of the scheme. 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.

Principle of development in terms of land use

29. Paragraph 141(a) of the NPPF promotes making effective use of underutilised land, especially where this would help meet an identified need for housing. This has been incorporated into adopted policy as set out in Policy GG2 of the London Plan which seeks to prioritise the development of Opportunity Areas and sites which are well-connected by existing or planned Tube and rail stations and small sites. 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.
30. In the draft OKR AAP, the site is identified as falling within Sub Area 2 and Proposal Site OKR10. The draft site allocation states that redevelopment on this site must:

- Development must replace existing employment floorspace (B use class) and provide a range of employment spaces
 - Figure SA 2.3 (Page 133 of the OKR AAP) identifies 2-10 Ossory Road as a site that is suitable for small industrial units with light industrial uses and marker spaces with residential units above
31. The existing use on site is not considered to maximise the potential of this Opportunity Area Proposal Site. The proposed re-development of the site would provide modern day requirements for light industrial spaces with the introduction of C3 residential use class to create a mixed use development. It is anticipated that the scheme would deliver major regeneration benefits that are further discussed in the proceeding parts of this report.

Image: Sub Area 2 focused on OKR 10 with subject site outlined in red



Typology map of OKR 10



Industrial land

32. The site is designated as Preferred Industrial Location-Strategic (OKRAAP) and Strategic Industrial Land (SIL) in current adopted Policy. It is noted that in view of policy changes at local level the New Southwark Plan proposes the re-designation of the site as LSIS. 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.
33. 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).
34. The London Plan 2021 identifies LB Southwark as a borough which should retain industrial capacity, Policy E5 states development proposals for uses in SILs other than industrial and related functions (including residential development, retail, places of worship, leisure and assembly uses), should be refused except in areas released through a strategically co-ordinated process of SIL consolidation.

35. The Old Kent Road was designated as an Opportunity Area through the previous iteration of the London Plan, with an indicative capacity of 1,000 new jobs and a minimum of 2,500 new homes. However, this has been increased to an indicative capacity of 12,000 homes in the New London Plan (2021). The London Plan notes that the emerging OKR AAP should “*set out how industrial land can be intensified and provide space for businesses that need to relocate from any SIL identified for release. Areas that are released from SIL should seek to co-locate housing with industrial uses, or a wider range of commercial uses*”.
36. 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.
37. Paragraph 48 of the NPPF (2021) 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. Whilst the OKR AAP and NSP remain in draft form, these are at an advanced stage in the adoption process, with the NSP being adopted in February 2022. Therefore, in accordance with paragraph 48 of the NPPF, the NSP and the de-allocation of the site as SIL is a material planning consideration and holds very significant weight in the decision-making process.
38. The subject site is allocated within the emerging New Southwark Plan as part of Site Allocation NSP 66 which allocates the site as part of a wider regeneration area. Site allocation NSP 66 (Land bounded by Glengall Road, Latona Road and Old Kent Road) seeks a comprehensive mixed-use redevelopment of the site to include the delivery of new homes alongside the delivery of new homes, retail, community and employment uses. The image on the previous page, Typologies Map of OKR 10, identifies the building uses for OKR 10. The subject site is identified as suitable for residential use above industrial uses on lower levels of the development.
39. Given the above, whilst the proposed development is currently located on SIL, given the co-ordinated masterplanning approach to the managed release of industrial land set out above, the proposed land uses are considered wholly appropriate in strategic planning terms and comply with both London Plan and Local Plan policies. It is therefore considered that the departure of the subject site from SIL designation is acceptable.

Employment re-provision

40. The subject site currently has 966sqm of commercial floorspace. The draft AAP policy AAP 5 seeks to ensure that there is no net loss of industrial floorspace across the opportunity area, and that industrial floorspace should be re-provided or increased on development sites.

41. The development would provide 421sqm of fitted out light industrial floorspace (Class E) at ground floor. Whilst this would result in a decrease of 545sqm in total floorspace compared to the existing floor area. In this instance, the proposed floorspace would offer a marked improvement in the specification and quality of that would to a degree off set that loss. In addition affordable workspace would be provided on the linked site and the light industrial use would be secured in the s106 agreement that should result in a strengthening of the LSIS. It is also noted that a key objective identified in both the Site Allocation of the NSP, and OKR AAP is providing both light industrial and residential floorspace on development opportunities.
42. As mentioned above, modern day requirements for light industrial spaces have been considered with key qualities incorporated into the design and layout. The commercial space proposes 4m floor to ceiling heights with the layout of the space at ground floor being designed to be flexible to enable use by a single occupant or multiple smaller occupiers should demand arise. A number of design recommendations from Vital OKR (who represent local businesses) have been incorporated into the scheme such as 3m wide doors with the potential for higher windows which would allow occupiers to utilise all wall spaces. A separate access door (to the residential) is located on Ossory Road and will provide direct access into the unit ensuring that the operation of the commercial floorspace is not curtailed. Servicing will be from Ossory Road and this was identified as being the most flexible arrangements in discussion with Vital OKR.
43. The council will be applying a condition requiring details of the mechanical and electrical fit out of the commercial floorspace (including lighting, heating, cooling, 3 phase power supply and kitchen and toilet facilities) to have been agreed and completed prior to the occupation of the residential use. In addition the commercial floorspace will also be required to have a sprinkler system for fire suppression. Notwithstanding the new use classes order a condition and clause on the s106 agreement will limit the future use to light industrial, class E (g) only.

Image: Ground floor layout demonstrating the light industrial provision and ancillary space

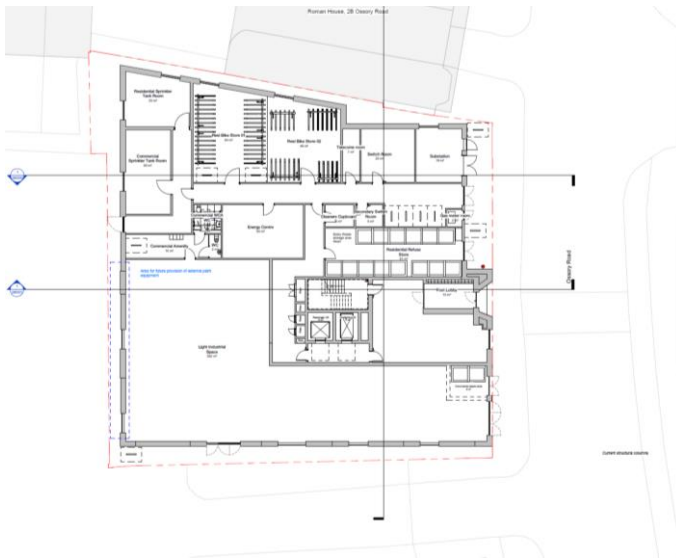


Image: Floor to ceiling height of ground floor light industrial space



Job creation

44. FodaBox employs six workers in the current use on site. The redevelopment of the site will provide flexible working space which meets the needs of small and medium businesses and could provide capacity for at least a dozen jobs based on official employment yield of 1 per 35sqm. As the existing business on site has six Full Time Employees (FTE), the redevelopment of the site would result in floorspace with a maximum employment matrix figure of 12 FTE which results in an uplift of employment opportunities.

Affordable workspace

45. 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. As mentioned previously in this report, this application is linked to another scheme being brought forward by the Applicant at Credon House (planning ref: 21/AP/3247). Combined

the two sites would provide 503sqm of commercial floorspace. Individually the schemes do not meet the 500sqm threshold; nonetheless the applicant is committed to providing affordable workspace, and the 82sqm provided within the Credon House development forms the affordable workspace proposed for the linked schemes. This equates to 16.30% of the combined schemes.

46. The Local Economy Team (LET) within Southwark supports the application given that it matches the economic, job, and growth plans for the Borough. All LET recommendations 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 would also be secured through the Section 106 Agreement.

Assessment of main town centre uses

47. The subject site is designated within the New Southwark Plan (NSP) as being part of the Old Kent Road South District Town Centre. The development would support the future aspirations of the Town Centre given that it would introduce new commercial floorspace and housing within the new town centre.

Provision of housing, including affordable housing

48. The scheme would deliver 117 new residential units, of which 39 would be affordable in the intermediate tenure. As mentioned in paragraph 12 of this report, this application is linked to another scheme being brought forward by the Applicant at Credon House (planning ref: 21/AP/3247) which will provide 22 units. Between the two sites, the Applicant will deliver a total of 139 new homes, of which 50% will comprise affordable housing by habitable room (61 homes). The subject scheme will deliver solely the intermediate and market housing accommodation, with social rented units being provided at Credon House. The affordable housing provision is a positive aspect of the scheme and far exceeds the minimum of 35% as required by Draft OKR AAP Policy 4.

Prematurity

49. Legal Advice received in relation to this issue highlights the following from the National Planning Policy Guidance:

“arguments that an application is premature are unlikely to justify a refusal of planning permission other than where it is clear that the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, taking the policies in the Framework and any other material considerations into account. Such circumstances are likely, but not exclusively, to be limited to situations where both:

- a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing

- of new development that are central to an emerging Local Plan or neighbourhood planning; and
- b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.
50. 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.”
51. The most up to date adopted development plan document pertinent to the Old Kent Road is the 2021 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 its previous iteration London Plan 2016) and has also sought to address the increased housing target for the opportunity area and the need to ensure that the London Plan aspirations for industrial land and employment are addressed. The NSP is due to be adopted in February 2022. 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 2021 London Plan and the policies of the soon to be adopted NSP, and the 2017 and 2020 draft OKR AAPs. It is not therefore considered to be premature.

Conclusion on land use

52. The scheme would deliver major regeneration benefits, including a significant contribution to the borough’s housing stock, intermediate affordable housing, social rented housing on the linked site, job creation, and the introduction of a mixed use ground floor commercial space to the development with residential on the upper floors. Whilst the commercial use on the site has not been entirely re-provided the overall balance of benefits is considered to outweigh that shortfall. It is therefore considered that the development, in land use terms, is acceptable, and its contribution to Site Allocation 10 and the surrounding Old Kent Road Opportunity Area (OKROA) should be supported.

Affordable housing and development viability

Affordable Housing

53. National, regional and local planning policies place a high priority on the delivery of affordable housing as part of the plan led approach to addressing the housing crisis. Southwark’s Strategic Housing Market Assessment (SHMA) identifies a need for 2,077 social rented and intermediate homes per annum which is approximately 71% of Southwark’s total housing need. The SHMA suggests that approximately 78% of the total affordable housing need is for intermediate housing to meet the housing needs of lower and middle income residents. However, the

most acute 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.

54. The regional policies relating to affordable housing are set out in the London Plan 2021, with the three key policies being H4, H5 and H6. These should be applied having regard to the Mayor's 'Housing' and 'Affordable Housing and Viability' SPGs. Policy H4 requires development to deliver the maximum reasonable amount of affordable housing, with the Mayor setting a strategic target of 50%. Policy H6 also prescribes the tenure split of affordable housing. It requires:
 - at least 30% to be low-cost rent (social rent or London Affordable Rent);
 - at least 30% to be intermediate (with London Living Rent and shared ownership being the default tenures); and
 - the remaining 40% to be determined by the borough as low-cost rented homes or intermediate tenure(s) based on identified local need.
55. The relevant adopted local policies are Saved Policy 4.4 of the Southwark Plan 2007 and Strategic Policy 6 of the Core Strategy 2011. Further guidance on how to implement the policies is contained within the council's adopted Affordable Housing SPD 2008 and draft Affordable Housing SPD 2011.
56. Strategic Policy 6 requires as much "affordable housing on developments of 10 or more units as is financially viable". It also sets the lower threshold, requiring at least 35% of the residential units within new developments of ten or more dwellings to be affordable subject to viability. Draft policy 4 of the OKR AAP also requires a minimum of 35% of new residential developments to be affordable, and has an ambitious target of 7,000 additional affordable homes in the Opportunity Area between 2017- 2037.
57. Emerging local policy P1 of the NSP, to which weight can be given, requires developments of 10 or more homes to deliver the maximum viable number of dwellings in an affordable tenure, setting a minimum threshold of 35%. A minimum of 25% of the total housing should be social rent, and a minimum 10% as intermediate, calculated on a habitable room basis. These requirements derive from the council's Strategic Housing Market Assessment, which identifies a pressing need for social rented and intermediate homes in Southwark.
58. Pocket Living is a private developer which specialises in providing intermediate homes for first time buyers who earn too much for social housing and too little to buy a property on the open market. Pocket has established partnerships with the GLA, TfL and Homes England, to deliver intermediate affordable homes. Pocket first received Mayoral funding in 2013 from the Housing Covenant Fund, for Pocket to deliver intermediate homes for first time buyers. Sadiq Khan provided further loan funding in 2017 for Pocket's "genuinely affordable homes", increasing delivery to over 1,000 starts by 2021.
59. Unlike conventional shared ownership and shared equity products where buyers increase their stake by 'staircasing', people buying Pocket homes own 100% of the equity and value of their home from day one, with a discount of at least 20%

of the open market value. A restrictive covenant is put in place to ensure the homes remain affordable in perpetuity, through any re-sales which are restricted to eligible people who live or work in the borough. Resales are managed by Pocket to ensure that homes are only resold to eligible people. This is different from conventional shared-ownership units for example, which can staircase out as purchasers increase their share, and can eventually be sold on the open market without any restrictions, effectively removing them from affordable housing. Pocket puts measures in place including their annual verification process to ensure that the units are lived in by the purchasers, and will only grant consent for them to be rented out in exceptional circumstances and for a period of 12 months only. In these exceptional circumstances, rent levels are capped at 80% of the market rent and this too is secured through the s106 agreement.

60. Pocket homes fall within the NPPF definition of affordable housing because they remain affordable in perpetuity, and are subject to the following eligibility criteria which would be secured through the s106 agreement:

Income thresholds

61. Purchasers must have a household income at or below the council's intermediate affordable housing threshold for the first three months of marketing. The threshold which for a 1-bedroom unit is currently set at £50,071; the application submission advises that the average salary of a Pocket occupier is £42,000. If after three months of marketing no purchaser earning up to the council's income threshold has been found, income levels would increase to the Mayor's threshold which is currently set at £90k.

Purchasers must live or work within the borough

62. The submission advises that there are currently 34,000 people across London who have registered with Pocket. Of these, at present there are 2,600 eligible buyers who live or work in the borough. On the Share-to-Buy website there are 5,000 eligible buyers who live or work in the borough. As the council does not operate a waiting list for intermediate housing, potential purchasers would need to be registered with Pocket or First Steps (Share-to-Buy). If after six months it were not possible to find enough purchasers who live or work in the borough, the units could be offered London-wide within the Mayor's income threshold to first-time buyers. However, this is an unlikely situation given that the number of people registered for a Pocket home in the borough significantly exceeds the number of homes that would be available.

They must not already own another property

63. Purchasers of Pocket units must not own another property.

Development viability

64. As mentioned in the affordable housing section of the report above, London Plan Policy H4 sets a strategic target of 50% affordable housing onsite. The policy sets

out parameters for fast track routes which will not require a viability assessment and stipulates that fast track applications will be subject to review mechanisms if development is not commenced within two years. The fast track approach is also reflected in NSP policies.

65. NSP Policy P1 states that where development that provides 40% social rented and intermediate housing affordable housing, with a policy compliant tenure mix, (a minimum of 25% social rented and a minimum of 10% intermediate housing) as set out in table 1 with no grant subsidy. Where developments follow the fast track route they will not be subject to a viability appraisal. A viability appraisal will be necessary if amendments are proposed to lower the affordable housing provision to less than 40% following the grant of planning permission.
66. This application is linked to another scheme being brought forward by the Applicant at Credon House (planning ref: 21/AP/3247) which will provide social rent housing. Between the two sites, the Applicant will deliver a total of 139 new homes, of which 50% will comprise affordable housing by habitable room (61 homes). The affordable provision in the subject scheme will deliver solely intermediate accommodation, comprising of 39 Pocket Units, and 22 social rented units would be delivered at Credon House. The numerical breakdown of the affordable units across both sites would be in line with NSP policy. Of the Affordable housing provided between the two sites, the Credon House element would provide 50% Social rent, and this scheme would provide 50% intermediate.

Conclusion on affordable housing

67. In conclusion, the privately-owned sites that do not benefit from public subsidy, provides an affordable housing offer of 50% that meets local and London-level policy requirements, and therefore a viability appraisal is not required. The delivery of social rent and intermediate units, is a very positive aspect of the proposals. In line with section E of London Plan Policy H5, to ensure the applicant fully intends to build out the permissions, the requirement for an Early Stage Viability Review will be triggered if an agreed level of progress on implementation is not made within two years of the permission being granted. This will be secured through the S106 Agreement.

Design considerations

68. Strategic Policy 12 of the Southwark Core Strategy (2011) states that all development in the borough will be expected to “achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in.” Saved Policy 3.12 ‘Quality in design’ of the Southwark Plan asserts that developments should achieve a high quality of both architectural and urban design, enhancing the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit. Saved Policy 3.13 of the Southwark Plan asserts that the principles of good urban design must be taken into account in all developments. This includes height, scale and massing of buildings, consideration of the local context, its character and

townscape as well as the local views and resultant streetscape. With specific reference to tall buildings, Policy D9 of the London Plan (2021), 'Tall 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.

69. 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 a series of tests for tall buildings (defined as significantly taller than surrounding buildings or their context). It also states that the highest tall buildings will be located in areas where there is the greatest opportunity for regeneration, including Opportunity Areas, such as The Old Kent Road Opportunity Area. The OKRD AAP contains a tall building strategy AAP 8 "The Stations and the Crossings" that identifies the location of tall buildings and also sets out guidance for the height of other buildings. This guidance is in turn amplified in Sub Area 2 "Building Heights Guidance".

Site layout

70. The development occupies the entire site, with a raised podium at first floor level as indicated in the Sub Area 2 masterplan. At ground floor the windows are aligned to the residential levels, but detailed in a way that makes them both distinct and complementary to the floors above. Brickwork openings are taller here, relating to the taller floor height. Wall space to the ground floor industrial space provides internal wall pin-up/ storage space. To the northern section of the ground floor fronting Ossory Road, brick openings are larger allowing for access to the refuse stores, cycle stores and substation, all of which is required to be on Ossory Road. The southern section of the ground floor fronting Ossory Road provides the main residential entrance, and is recessed to provide a sheltered area outside the main door.
71. The repeating nature of the floor plans from level 01 upwards sets up a regular series of punched windows. Depending on the tenure of the home, living areas are either provided with Juliet balconies or a projecting balconies. The aforementioned repeating arrangement of the floor plans for the residential use means that the corridors have been split so that between six and eight homes would be accessed from one corridor which runs north-south with between four and five homes accessed from another east-west section of corridor. A window is proposed at the end of the central corridor of the northern block, which allows natural light into the circulation space.
72. The communal amenity space is provided within two separate areas of the development. The larger, podium like space is located on the first floor, with a smaller and quainter amenity space proposed for the rooftop. Further details on these two spaces are discussed in the Landscaping section of this report.

Height scale and massing (including consideration of tall buildings)

Image: The development, viewed from Ossory Road



73. As the site is bounded closely on the north and north-west sides by 2b Ossory Road (commercial at ground with three storeys of residential above) and Milestone House (five storeys of residential), a careful massing approach to the scheme is required. Due to the close proximity of the nearby properties, the plinth only extends for the ground floor level. The design guidance contained within the OKR AAP recommends that buildings in this vicinity are 'solid and robust' in their appearance. The massing of the development takes the form of two juxtaposed blocks (from Ossory Road), so that this main elevation has a more vertical emphasis. To avoid the appearance of the development being slab-like, the residential units are arranged in a 'U' shape that enables the massing to be viewed as a transition point in the OKROA between the bottling factory and Glengall Road to the west, and the Malt Street development to the southeast.
74. The northern elevation is also set back by around 1m for the most part from the ownership boundary, and allows a gap between the building and its neighbour. On the western elevation, the back of the 'U' shaped block arrangement is apparent here, with the ground floor plinth set toward the site boundary, and the southern building block set back to allow for the amenity space on the first floor of the development.

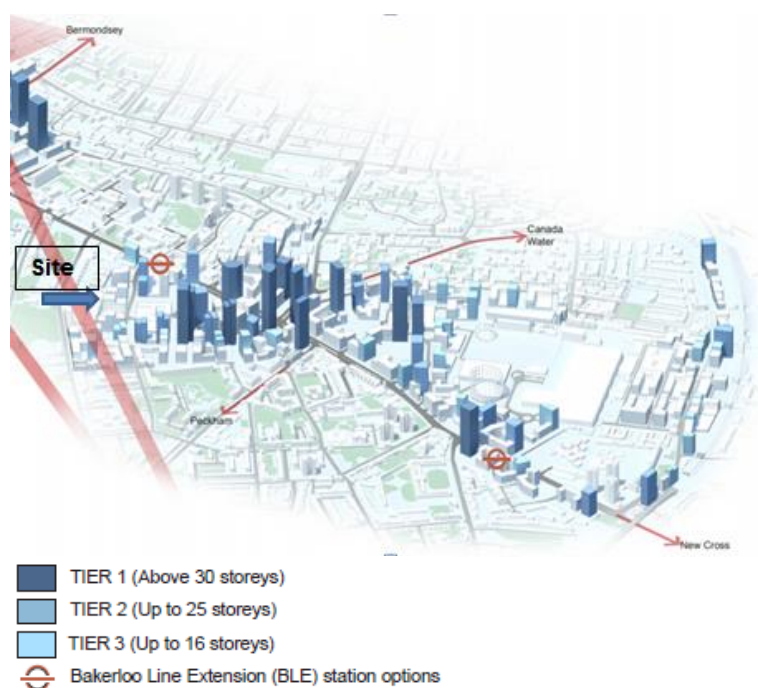
Draft OKR AAP

75. 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. The subject site is identified within the OKR AAP as being eligible for a lower/mid-scale development which reflects the approved height of the Hireman (19/AP/7610) site immediately next to the application site.

76. Outlined in the OKRAAP is a height strategy within each Sub-Area and Site Allocation of preferred buildings storeys. Within the subject site the heights of buildings are expected to reduce towards the edge of the masterplan to 8-10 storeys. As the scheme proposes a part 1/10/11 storey building, the height is therefore broadly in line with the requirements of the OKRAAP.

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



77. In line with the draft OKRAAP, the design of the buildings would reflect the industrious nature of the area. The development would be of a relatively modest height with two distinctive characters to the façade of the building. The scheme would be viewed in the context of developments of similar heights along the western side of Ossory Road. This development has a significantly reduced mass and height from the nearby Malt Street and Cantium Retail Park developments which allows for the development to successfully integrate into the aims and objectives of the OKR AAP for Sub Area 2. Given the above, the impact of the development on the skyline is considered to be acceptable.

London Plan (2021)

78. As the development would be substantially taller than its existing surroundings, it would be defined as a tall building in the adopted London Plan (2021). Policy D9 of the 2021 London Plan, 'Tall Buildings', states that '*Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan*'. Furthermore, London Plan Policy SD1 'Opportunity Areas' affirms the need to ensure that

Opportunity Areas maximise the delivery of affordable housing and create mixed and inclusive communities. Table 2.1 of Policy SD1 identifies Old Kent Road as an Opportunity Area with an indicative capacity of 12,000 new homes. 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 D9 such as architectural quality, visual, and environmental impacts of tall buildings which are discussed in further detail below.

79. 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. Whilst not located within a conservation area, the eastern edge of the Glengall Road Conservation Area is immediately adjacent to the site and encompasses the locally listed Bottling Factory. In addition the building will be seen in the setting of the listed buildings in Glengall Road in some views. 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.
80. Ossory Road is dominated by Industrial uses with limited active frontages and poor urban streetscapes. The replacement of the industrial use with a high quality architectural mixed use scheme is a significant public benefit of the proposed development.
81. The inclusion of modern light industrial requirements to the ground level floorspace along with the delivery of housing, and a generous portion of communal amenity space is considered to deliver significant contributions to local regeneration. 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. In the majority of cases however, there would be no significant adverse impacts.

Southwark Plan

82. 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 the London Plan (2021) 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.

83. The active frontages created along the Ossory Road frontages by the ground floor light industrial space, would make a positive contribution to Ossory Road. The location of the residential entrances and the ease of servicing access the development create a more positive streetscape. The building is not identified as forming a landmark in the AAP masterplan. Nonetheless it is considered that the proposal would provide an urban presence and legibility given its positioning at the western edge of Sub Area 2.
84. The development provides an appropriate balance between the industrial appearance of the neighbouring buildings south of the site, and the more residential and retail mix to the north of the site fronting Old Kent Road. The contrasting brick finishes creates an interesting architectural approach that is considered to successfully integrate the development within the immediate area.
85. The scheme defines a strong built edge along Ossory Road with a façade which engages and animates the street scene. The retention of light industrial use at the ground floor enhances the industrial character of Ossory Road. The maximum height of the development at 11 storeys, would mediate the transition in scale between tall buildings in the recently approved developments of Malt Street and the Cantium Retail Park, and the adjacent conservation area and listed buildings on Glengall Road.

Architectural design and materiality

86. The OKRAAP referring to the 'land bounded by Glengall Road, Latona Road and Old Kent Road' details specific design guidance and recommendations for development. The guidance states that:

"To the west, in response to the retained structures around Latona Road (including the bottling factory on Ossory Road, the chimneys and the Space Studios building and its neighbour), the architecture will have a more industrious character, with:

- *A solid and robust appearance;*
- *Punched windows and deep reveals;*
- *Muted details in industrial materials like metal or concrete (for example expressed structural elements like concrete lintels); and*
- *No lightweight materials like glass balustrades or timber cladding."*

87. The location of the subject site, immediately adjacent to the eastern edge of the Glengall Road Conservation Area requires a well-articulated design that preserves the appearance of the nearby conservation area, but also responds to the recommended materiality contained within the OKRAAP for the Ossory Road area. The scheme therefore produces a materiality approach that responds to both the contemporary aspect of the Old Kent Road and the historic buildings within conservation area. In achieving this, the treatment of the north and south blocks differ, whilst still complimenting one another even with the southern block projecting forward by approximately 2 metres. Contrasting brick colours of varied

red/brown brick for the historic residential/industrial and grey for the civic areas closer to the Old Kent Road are proposed.

88. The building is grounded and it is expressed as two vertical blocks with a consistent material reaching the ground; rather than being expressed as horizontal components. A horizontal recessed brick detail runs around the building at second to ninth floor. The southern block produces the same materiality appearance of the neighbouring Bottling Factory and Space Studios that preserves the strong industrial character and appearance of Ossory Road. The northern block is proposed in grey brick that would be in regularity with the appearance and materiality of the buildings on the Old Kent Road near to the junction with Ossory Road. Windows to bedrooms on Ossory Road are required to have an attenuated ventilation panel. They will be faced with perforated powder coated aluminium, in two complementary colours to the brick. Other metalwork and metal cladding, balconies, and window and door frames will also be powder coated in the same complementary colours. As at the completed pocket scheme in Varcoe Road the window reveals would be set back by a full brick depth (215mm) giving a depth to the facades. The ground floor entrances and windows would achieve at least a similar set back. This and other details would be secured by condition.

Image: Materiality palette

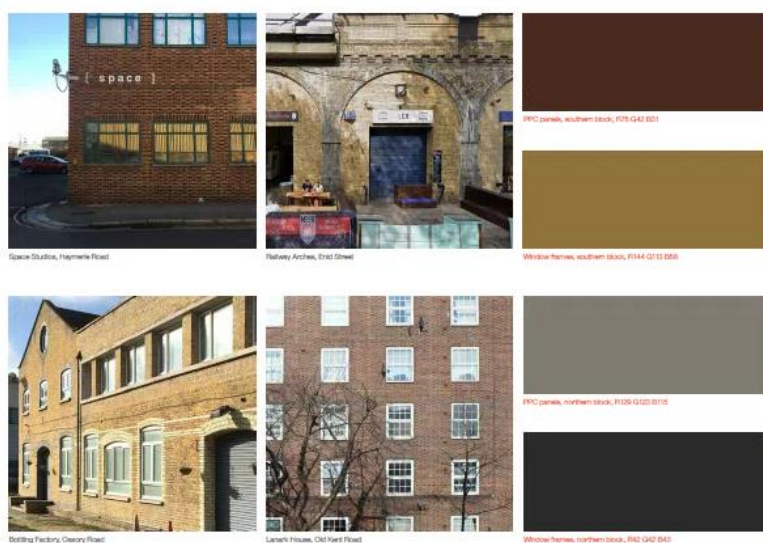
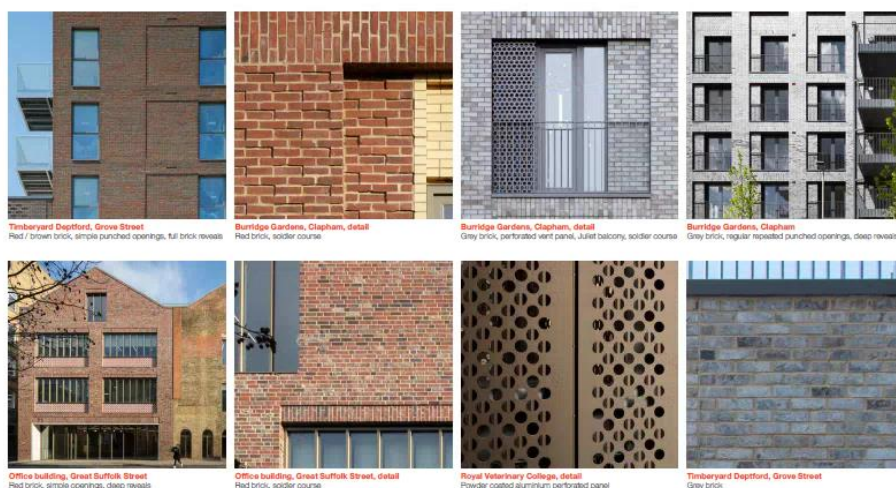


Image: Buildings showcasing the proposed material choices for the scheme



89. The proposed design is well conceived and executed. Overall, the architecture is effective and well-articulated. However, much will depend on the final materials and detailing, and therefore conditions have been attached to this decision to ensure the highest quality to the scheme. These will include conditions that require full brick depth window reveals, to ensure the requisite quality of appearance is achieved.

Landscaping

90. As the development takes up nearly the entire plot in line with the OKRD AAP no landscaping for the ground floor area is proposed. The landscaped elements are focused on each of the amenity areas within the development. The two communal amenity terraces have been designed to have different landscape functions and characters, responding to the environmental conditions and views at each location.
91. The first floor terrace provides a range of evergreen and perennial species that assists in buffering noise and noise pollution, whilst also providing a sense of enjoyment and colour to the terrace space. Areas of sensory and edible plant species are proposed for resident use, and three ornamental trees and climbing screens will provide vertical greening and privacy. Furniture elements such as timber seating benches along with table tennis are also proposed for the first floor terrace.
92. The tenth floor terrace proposes a private space for residents of the development with evergreen and sensory planting again providing a buffer to the noise from Ossory Road below, and Old Kent Road nearby. Seating furniture consisting of timber benches is again provided in this terrace space. Additionally, a bio-diverse green roof of 195sqm is proposed with a mix of plug plants that forms an intensive natural roof garden that aims to attract important pollinator species, and to capture rainwater. A condition for a Landscaping Plan to be submitted and approved prior to occupation should be applied has been recommended by the Urban Forester and is attached to this decision notice.

Image: Sample layout of the communal amenity terraces



93. The council's Ecologist has reviewed the proposal and has identified that the site currently has negligible ecological value. Notwithstanding this, the Ecologist has recommended 24 swift bricks are placed at the top of the east elevation. The bricks shall be internal and set into the wall. The recommended condition is attached to the decision notice of this application along with a condition regarding details of the proposed green roof.
94. The security of future residents has also been considered, with lighting arranged around the external amenity areas. The lighting is of a low level and has been strategically placed so that there are no hidden corners within the amenity spaces. A lighting strategy would be secured by condition and the metropolitan police are satisfied that this scheme could achieve Secured By Design accreditation. Details of landscaping will be secured by condition to ensure that the aspirations set out in the planning application are delivered on site. This will include a requirement for the applicant to provide water taps at roof levels to ensure the planting can be maintained.

Trees

95. Saved Policy 3.13 of the Southwark Plan requires high quality and appropriately designed streetscape and landscape proposals.
96. There are no tree or landscape constraints on, or adjacent to the subject site. It is considered that the extensive design and detail of the landscape proposals for each terraced area has increased the Urban Greening Factor (UGF) from 0.08 to 0.23. GLA Officers acknowledge that the UGF cannot be increased any further due to maximising the development on the parcel of land. As set out in the AAP this site is expected to be developed at full site coverage. Whilst the shortfall is acknowledged, it is considered that the design has adequately balanced the

amount of soft landscape with the requirements for flexible and functional amenity space for residents.

Heritage and townscape considerations

97. Policy HC1 of the London Plan 2021 advises that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural detail. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to consider the impacts of proposals upon a conservation area and its setting and to pay “special regard to the desirability of preserving or enhancing the character or appearance of that area”. Section 66 of the Act also requires the Authority to consider the impacts of a development on a listed building or its setting and to have “special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”. Para 199 of the NPPF 2021 states that ‘great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.’

Conservation areas

98. The application site does not sit within a conservation area and it contains no listed buildings. There is however, the Glengall Road Conservation Area boundary which runs to the immediate south and west of the application site. The adjoining property on the west boundary is the Bottling Factory which separates the subject site from the residential aspect of the Conservation Area.

Image: Glengall Road Conservation Area boundary; subject site located in red

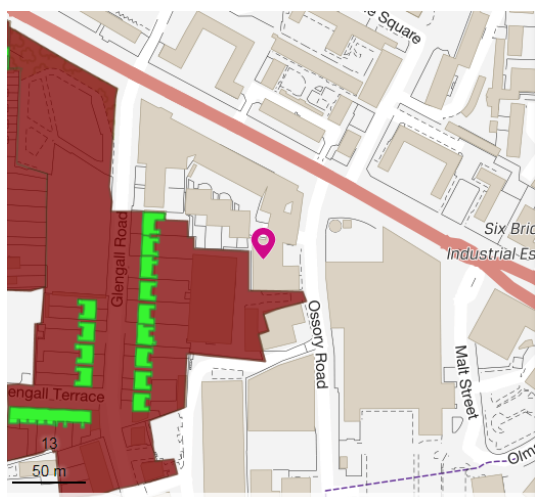


99. Beyond the Glengall Road Conservation Area lie the Trafalgar Avenue and Cobourg Road Conservations Areas. In addition, there are Grade II listed buildings that lie within the Glengall Road Conservation Area; including the following:
 - Nos. 1-35 Glengall Road

- Nos. 24-38 Glengall Road
- Nos. 1-9 Glengall Terrace

100. The Glengall Road Conservation Area is of heritage significance on account of its architectural and historical interest, relating principally to the 19th century development of the area. The Conservation Area has historic significance with origins as one of the earliest 18th century residential suburbs to be developed along the Old Kent Road.

Image: Listed buildings located nearby; subject site is purple pin



Draft OKR APP and Draft Local List

101. Although of limited weight, the draft OKR AAP also identifies buildings and features of townscape merit and buildings of architectural or historic interest. The following buildings, within the immediate vicinity of the site, are identified as such. These buildings are also included on the draft Local List published by the council in March 2018. No buildings of Townscape Merit are located near to the development; however, the neighbouring Bottling Factory is identified as a Locally Listed Building.

Image: Locally listed Bottling Factory building



Townscape and visual impact assessment (TVIA)

102. The submitted TVIA appraises three viewpoints which demonstrate that whilst the proposed development will introduce substantial change to the subject site and its locality, such change can be accommodated when considering the cumulative developments without unacceptable effects on townscape character, and visual amenity of the wider landscape. The three 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

103. The subject site is located nearby to the approved Malt Street and Cantium Retail Park Developments. The submitted TVIA's for these two schemes demonstrated that there would be no encroachment on the Viewing Corridor or Wider Setting Consultation Area as defined by the LVMF. As the Pocket Scheme is substantially lower than the tallest building height of the nearby approved developments, it is not considered that this TVIA is required to undertake a detailed assessment of LVMF views.

Local views

104. The three viewpoints of the submitted TVIA considered in this report are from locations nearby that have been assessed due to their potential impacts on Grade II Listed buildings of Glengall Road, and the visual amenity of the immediate area.

Viewpoint 1	
View location	Glengall Road looking east
Heritage Significance	High – Nos. 1-35 on the eastern side of Glengall Road are Grade II Listed Buildings
Other Significance	None
Sensitivity to change	High.
Impact of proposal	The site is situated in the centre of the view behind the residential housing on Glengall Road. The proposed development will be visible in the view but will not be seen in its entirety, protruding slightly over the roof line and is not considered overbearing, although it is acknowledged this would cause some harm to the setting of the listed buildings and the conservation area, given the relative scale of the intrusion the harm is considered to be less than substantial.

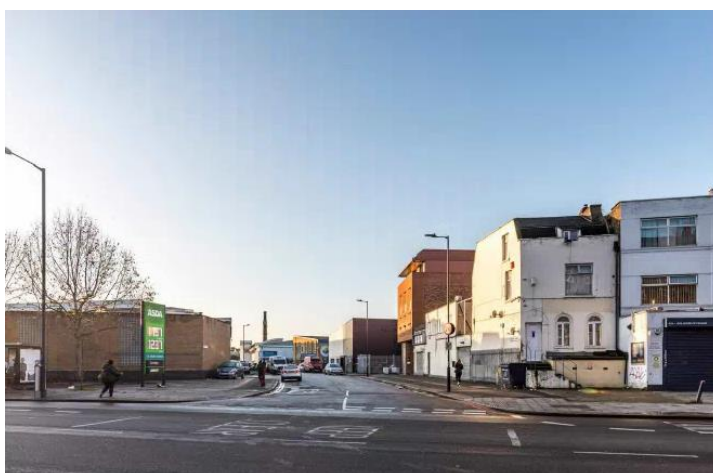
HE Comments	None
Conclusion	With a high sensitivity and a medium magnitude of change, the effect of the proposed development will be moderate.

Image: Viewpoint 1 showing the existing view and proposed view:



Viewpoint 2	
View location	Old Kent Road junction looking south
Heritage Significance	None
Other Significance	None
Sensitivity to change	Low
Impact of proposal	The existing view has a very mixed character, with buildings of different ages and use.
HE Comments	None
Conclusion	The proposal results in a substantial change to the existing viewpoint; however, the proposed view is not considered to harm the setting of the immediate area.

Image: Viewpoint 2 showing the existing view and proposed view:



Viewpoint 3	
View location	View from Ossory Road looking north
Heritage Significance	None.
Other Significance	None.
Sensitivity to change	Low
Impact of proposal	The existing view is partly screened by a tree. The proposed view is considered to result in a substantial change; however, the existing built form in the view is not of a high quality.
HE Comments	None
Conclusion	With a low sensitivity and a high magnitude of change, the effect of the proposed development will be negligible.

Image: Viewpoint 3 showing the existing view and proposed view



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

105. 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
Glengall Road Conservation Area	Less than substantial harm identified to setting given the height of the development and its limited visibility from within the conservation area
Listed Buildings	Some less than substantial harm owing to the height and siting of the development
Draft Locally listed buildings/ undesignated assets identified in the draft Old Kent Road AAP	No harm identified.

106. It is noted that these are not the only views of the new building from the conservation area, or within the setting of the listed buildings. However view 1 shows the likely most significant impact, given that in views north and south along Glengall Road the building would be largely set behind existing roof lines. In conclusion, the proposed development would not have a significant impact on the views assessed despite it being a highly visible feature in some of the views from the surrounding townscape. The development is considered to be a beneficial addition to some of the viewpoints assessed, and in particular north and south along Ossory Road.
107. Historic England and the Greater London Authority raised no objection to any of the viewpoints assessed. The development is considered to improve the appearance of the subject site, creates an active frontage along Ossory Road, and produces a design that successfully moulds the contrasting materiality of the scheme with the visual amenity of the surrounding area. Special regard needs to be given to preserving the setting and special character and appearance of the listed buildings along Glengall Road. Whilst the development is acknowledged as causing some harm due to its visibility in the setting of those buildings, given that this is relatively limited it is considered to cause some less than substantial harm to the setting of the listed buildings on Glengall Road which is considered to be offset by the benefits of the scheme. Overall it is therefore considered that the

benefits of the scheme outweigh the limited harm from the proposed development to the surrounding area.

108. Given that it is close to adoption weight has been given to the emerging NSP policy, and full weight has been given to adopted policies, including the NPPF (2021), London Plan (2021) and Southwark Plan (2007) and Core Strategy (2011). As can be seen from the assessment contained within this report, the proposals are considered to be in compliance with these draft and adopted policies.

Housing mix, density and residential quality

Housing mix

109. 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).
110. Policy H10 of the London Plan relates to housing size and mix; it seeks to guide borough and developers on unit mix within new residential developments, and states that schemes should generally consist of a range of unit sizes having regard to robust local evidence, the requirement to deliver mixed and inclusive neighbourhoods and the range of tenures in the scheme.
111. In terms of evidence of local housing need, census data for the borough shows Southwark generally has a much lower age profile than the national picture, with the largest proportion of the population between the ages of 20 and 35 and the largest single household type in Southwark being single people, making up 33.5% of all households within the borough. Furthermore, census data also shows this younger age group are most heavily represented within the private rental market with 46% of individuals in private rental accommodation and only 19% of this age group within owned or shared ownership properties.
112. The development would provide 117 one bedroom one person units. Whilst this delivery deviates from Strategic Policy 7, this should be weighed in the balance against the benefits of the scheme being linked with the Credon House that provides social rented housing mix of 1, 2 and 3 bed units.

Wheelchair housing

113. 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 D7 requires at least 10% of new dwellings to meet Building Regulations requirement M4(3)(2)(a) 'wheelchair adaptable', with all other dwellings meeting Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. This is reiterated in emerging policy in the draft OKR AAP and the New Southwark Plan.

114. 12 units within the scheme of the proposed new homes would meet Building Regulations Part M4(3)(2)(a) “wheelchair adaptable”, which equates to 10.26% of all dwellings. The wheelchair adaptable dwellings would be secured through the Section 106 Legal Agreement.

Density

115. There is a pressing need to optimise the use of land in London, particularly in Opportunity Areas across London. Policy AAP1 of the Old Kent Road Area Action Plan seeks to increase the delivery of homes within the Opportunity Area and to achieve this encourages high densities that would normally be expected of Central London. 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.
116. 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 residential component has a net density which equates to 1,170 units per hectare or 2,340 habitable rooms per hectare calculated in accordance with the Residential Design Standards SPD 2011.
117. 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	Each of the homes proposed will have storage space in compliance with the Residential Design Standards SPD. An area within the residential refuse store at ground floor level has been designated for bulk storage of larger waste items.
Exceed minimum privacy distances	<p>The SPD states that a minimum of 12m at the front of the building and any elevation that fronts onto a highway should be achieved, as well as a minimum distance of 21m at the rear of the building.</p> <p>A minimum distance of approximately 15m is retained between the windows in the southern</p>

	<p>elevation and those within the neighbouring scheme at the Hireman site (14-22 Ossory Road – planning permission 19/AP/7610). These properties are separated by a cobbled highway and during pre-application discussions the planning officer confirmed this separation distance was acceptable in an Opportunity Area where substantial regeneration is proposed. Only secondary windows are proposed in the northern elevation and no windows are located in the flank elevation of the adjoining site so no overlooking is considered to occur. 65m and 80m will be retained from the windows within the Western elevation of the Application Scheme and those at Glengall Road, thus significantly exceeding the minimum privacy distance of 21m.</p>
Good Sunlight and daylight standards	<p>The Daylight and Sunlight Report prepared by Right of Light Consulting confirms that the proposed homes broadly achieve a high level of compliance with all the requirements set out in the BRE guide 'Site Layout Planning for Daylight and Sunlight'.</p>
Exceed the minimum ceiling height of 2.3m required by building regulations	<p>All homes will have a minimum ceiling height of 2.5m, thus exceeding the council's minimum standards.</p>
Exceed amenity space standards (both private and communal)	<p>Two communal roof terraces will be provided at the first and tenth floors. These will provide a total of 281sqm of communal amenity space. Private balconies and terraces will also be provided for 78 homes. The total amenity provision across the site will be 701.3sqm.</p> <p>Whilst this falls short of the requirement of 1220sqm of private and communal amenity space to be provided on site, it is acknowledged that Pocket Homes are usually provided without balcony spaces as per the completed scheme at Varcoe Road. The private sale flats have all been provided with balcony spaces. In addition the site is within close walking distance to three parks (Burgess Park, Surrey Linear Canal Park and Leyton Square Recreation Ground), which provide a large amount of high quality external amenity space which can be enjoyed by future occupants of the proposed development. Additionally, the council have aspirations to provide a linear new</p>

	park with OKR10 which will further increase the external amenity opportunities for future residents.
Secured by Design Certification	Detailed pre-application discussions have taken place with a Metropolitan Police Designing Out Crime Officer to ensure the proposed development achieves the principles of Secure by Design.
No more the 5% studio flats	The development proposes no studio flats.
Maximise the potential of the site	The potential of the application site has been maximised by providing a substantial contribution to the affordable housing target for the area as well as a high-quality light industrial space at ground floor level. The scheme makes efficient use of land in accordance with the NPPF and contributes to the regeneration of the Old Kent Road Opportunity Area.
A minimum of 10% of units are suitable for wheelchair users	The Application Scheme includes 12 wheelchair adaptable dwellings which meet M4(3)(2)(a) standards with all remaining home being wheelchair accessible and adaptable M4(2). This meets the 10% minimum requirement of wheelchair user dwellings.
Excellent accessibility within buildings	The Application Scheme has been designed to provide excellent accessibility to all, including the residential and light industrial space, and communal amenity space. The scheme will include two lifts, both of which access all levels of the development, thus ensuring the building will remain fully accessible in the event of one lift being out of service. All thresholds to the homes and communal amenity spaces will be level.
Exceptional environmental performance	The scheme has implemented a three-step Energy Hierarchy and the estimated regulated CO2 savings on site are 69.2% for the domestic part and 59.8% for the non-domestic part of the development, against a Part L 2013 compliant scheme with SAP10 carbon factors. The application site has been designed to connect to the planned District Heating Network at SELCHP when this becomes available.

Minimise noise nuisance between flats, through vertical stacking of similar room types	The stacking of homes has been maximised across the residential element of the proposed scheme. The same typical floor plan has been used across all residential floors, resulting in bedrooms over bedrooms and lounges above lounges throughout the whole residential element of the development. The Application Scheme has also been designed to minimise noise transfer between the light industrial use on the ground floor and residential homes on the first floor.
Make a positive contribution to local context, character and communities	The development will make a positive contribution to the local context in delivering a well-designed building that has taken cues from the existing and emerging character and context of the application site. It is considered that the scheme will provide substantial regeneration benefits including policy compliant level of affordable housing, private market housing and light industrial floorspace, providing activation at street level within the OKR Opportunity Area.
Include a predominance of dual aspect units	The majority of flats are not dual aspect. In all xx % of the total are dual aspect. In large part this arises, from the layout and provision of 1b1p homes, the proposal provides the maximum level of dual aspect units which can reasonably be achieved, with the Pocket Homes model. Nonetheless the key habitable rooms for each flat will be provided with generously portioned windows to maximise the levels of daylight received resulting in the provision of high-quality homes for future residents. Four homes on each floor will be dual aspect (40 in total).
Have natural light and ventilation in all kitchens and bathrooms	All units are fitted with large windows to maximise the amount of light received by the home. Each bedroom within the scheme will have a window allowing for natural light and ventilation. Open plan kitchen / living rooms will be fitted with opening windows to maximise air flow and natural light entering the space. Four homes on each floor will be dual aspect which will allow cross-ventilation through the apartments.

At least 60% of homes contain two or more bedrooms	All 117 homes at this site will be specifically designed as 1b1p homes. However, larger homes (including family homes) will be provided as part of the linked application at Credon House delivering 7no. 2 beds and 7no. 3 beds as well as 8no. 1 beds. The provision of a policy compliant 50% affordable scheme, is considered to be a material planning consideration which significantly outweighs the provision of larger homes in this location. The proposed type and tenure of housing at both linked schemes meets an identified housing need within the Borough.
Significantly exceed minimum floorspace standards	All units have an efficient internal layout and space. In this instance, all homes will exceed the 37sqm minimum internal floor area for 1 bedroom 1 person dwellings, with 78 homes at 38.3sqm; 27 homes at 38.4sqm; 10 homes at 47.4sqm; 1 home at 50sqm and 1 home at 54sqm.
Minimise corridor lengths by having an increased number of cores	Although only one core will be provided through the building, the stairwell and two lifts have been provided centrally within the building reducing the maximum distance between lift and flat entrance.
No more than 8 units per core	The corridors have been split so that between six and eight homes would be accessed from one corridor which runs north-south with between four and five homes accessed from another east-west section of corridor. This prevents long corridors being provided and ensures future residents retain a sense of ownership over their communal areas.
Achieve exemplary architectural design	The architectural design proposed for the buildings is of the exemplary standard.

Quality of residential accommodation

118. 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

119. 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).
120. All proposed homes would exceed the minimum standard of a one bedroom one person unit of 37 sqm in accordance with the minimum space standards as per Table 3.1 of the London Plan 2021.

Table: Proposed flat sizes

Unit Type	SPD Requirement (sqm)	Size range proposed (sqm)*
1 Bed 1 Person (Studio)	37 sqm	38.3 – 54sqm

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

121. Dual aspect homes have been maximised where possible across the development with four units per floor being dual aspect. 9 units across the application scheme would be single aspect and north facing (7.7%). The submitted daylight and sunlight assessment demonstrates that the north facing homes would still receive very good levels of daylight, due to the shallow floor plan, to ensure the occupants of these homes have suitable levels of residential amenity. Overall, it is therefore considered that the size and layouts of the one bedroom units are acceptable, and would provide a good quality of accommodation.

Internal daylight and sunlight

122. An Internal Daylight and Sunlight report, based on Building Research Establishment (BRE) Guidance, has been submitted. This considers light to the proposed dwellings using the Average Daylight Factor (ADF), and Position of No Sky Line (NSL). ADF determines the natural internal light or daylight appearance of a room and the BRE guidance recommends an ADF of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens. The NSL assessment is not applicable where a room derives its daylight solely from a light well or atrium. In these situations the room relies on borrowed light instead of direct skylight.
123. The results of the internal assessment on daylighting demonstrate that all rooms surpass the BRE Average Daylight Factor targets, and the majority, by a significant margin. The sunlight to windows assessment establishes that the majority of living rooms have at least one window that faces within 90 degrees due south.

Conclusion on quality of accommodation

124. The floor layouts and size of the units proposed within the development are a positive aspect of this development and enables the occupiers to move freely through each unit without contriving circulation and movement. The provision of two external terraces for communal amenity enhances the quality of accommodation for future occupiers to enjoy.

Outdoor amenity space, play space and public open space

125. 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.
126. 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 either on site as set out in the masterplan or through an off-site payment.
127. In this instance Children’s Play Space is not a required. The accommodation proposed seeks permission for one bed one person homes. The GLA child yield calculator assumes that these will not generate the need for any play space.
128. In light of the above, the assessment for this scheme will be for private amenity space, communal amenity space, and public open space. The requirements for private and communal space are set out in adopted policy and the Residential Design Standards SPD. The requirement for public open space either on site or as an in lieu payment as indicated by the sub area masterplan 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

129. Section 3 of the Residential Design Standards SPD sets out the council’s amenity space requirements for residential developments and states that all flat developments must meet the following minimum standards and seek to exceed these where possible:
- 50 sqm communal amenity space per development
 - For units containing three or more bedrooms, 10 sqm of private amenity space

- For units containing two or less bedrooms, 10 sqm of private amenity space should ideally be provided. Where it is not possible to provide 10 sqm of private amenity space, as much space as possible should be provided as private amenity space, with the remaining amount added towards the communal amenity space requirement
- Balconies, terraces and roof gardens must be a minimum of 3 sqm to count towards private amenity space

130. Pocket units meet the national space standards for internal accommodation, and are not normally provided with a balcony with a preference for full height windows and Juliet balconies. As a result of this, 39 units do not provide private amenity space within this development.
131. In light of the policy requirements listed above, it is assumed that all units require 10 sqm of private amenity space; the total requirement would be 1,170 sqm (i.e. 117 units x 10 sqm). 420.3sqm of private amenity is proposed, this aspect of the development has a shortfall of 749.7sqm. That is then added to the communal space requirement.

Communal amenity space

132. 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.
133. The communal requirement comprises a minimum of 50sqm, plus the 749.7sqm shortfall from the private amenity, which equals 799.7sqm. A total of 281.2sqm of communal amenity is proposed. This results in a shortfall of 518.5sqm of communal space. The communal amenity areas that are proposed takes the form of two spaces, located on the first and tenth floors. The breakdown of the spaces is detailed below:
- First Floor Terrace: 224.4sqm
 - Tenth Floor Terrace: 56.8sqm

Private and communal outdoor amenity space calculations

134. The following table summarises the private and communal amenity space requirements, against that proposed.

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

Communal amenity space proposed (Shared roof or terrace space)	Proposal	Shortfall
	281.2sqm Required 749.7sqm +50sqm = 799.7sqm	518.5sqm of communal amenity Payment, 518.5 x £205 = £106,292.50

135. As demonstrated in the tables above, there would be provide a shortfall in private and communal amenity space that generates a financial contribution of £106,292.50 in line the Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD (2015). The payment of this financial contribution, which would be secured through the Section 106 Legal Agreement, would make the private and communal open space offer policy compliant.

Public open space

136. The masterplans in the draft AAP identify some sites as providing new public open space, whilst other sites do not. Where sites are planned to be developed over the entire plot emerging Policy AAP10 of the draft OKR AAP requires the provision of off-site contributions. This is calculated at 5sqm of public open space per proposed home with the “shortfall” charged at £205 per square metre. As set out in the Section 106 and CIL SPD, £205 per sqm represents the average cost for providing open space in Southwark.
137. There is no public space proposed on this site as per the draft masterplan AAP. An off-site contribution will be secured through the s106 towards open space enhancements and provision within the AAP area.

Public open space calculation

Table: Public open space proposed

Public Open Space (Public space at ground floor, excluding play space)	Draft OKR AAP (2017) requirement AAP 11: Parks, streets, open spaces –The Greener Belt. (page 73).	Proposed public open space	Off-site requirement
	No public open space is shown as being provided on this site in the AAP masterplan. Therefore an off-site contribution of 5sqm of public open space per dwelling is required. 585sqm required	No public open space proposed in AAP masterplan.	585sqm 585 x 205 = £119,525

138. The off-site provision would generate a financial contribution of £119,925. The payment of the financial contribution, which would be secured through the Section 106 Legal Agreement. The money would go towards improvements of public parks and spaces within the Old Kent Road Opportunity Area.

Overall off site contribution

139. In total, as set out above, the proposals under consideration would generate a financial contributions of £226,217.50 relating to amenity space, play space and public open space, all of which would go directly towards new and existing park spaces in the AAP area.

Sunlight amenity analysis within the proposed development

140. BRE guidance for overshadowing to gardens and open spaces within a development recommends that at least 50% of any garden or amenity area should receive at least two hours of sunlight on 21 March. The results show that 34% of the amenity area at the first floor and 74% of the amenity area at the tenth floor will receive at least two hours of sunlight on 21 March. Whilst the amenity area at first floor does not meet the BRE 50% recommendation, given it is a large amenity area, it will receive a reasonable amount of well sunlit space. It is considered that the first floor terrace space provides sufficient useable space for the occupants who will reside within the proposed development. In addition, given residents have the opportunity to use the other amenity terrace (which does provide a very well sunlit environment), this illustrates that the scheme should not be refused based on the sunlight amenity for the first floor terrace falling below the 50% recommendation contained within the BRE guidance.

Conclusion on outdoor amenity space, play space and public open space

141. In conclusion, given the density and site coverage of the scheme under consideration, Officers are on balance satisfied with the quality and quantity of outdoor amenity space proposed. Whilst there is a shortfall for public open space and private amenity space, due to the development being maximised on the subject site, this is fully mitigated by the agreed financial contributions that would directly fund the maintenance of open spaces within the OKROA. Where amenity space is proposed on site, it is well planned, with efficient layouts that do not restrict movement or circulation. The landscape proposals are well thought through and of acceptable quality, which is a positive aspect of the scheme. To ensure the spaces delivered are of the highest quality, detailed landscape design can be secured by condition.

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

142. 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

143. The retention of the light industrial use through the provision of Class E floorspace within the ground floor, and the introduction of C3 Residential Use to the upper floors, is compatible with the predominantly light industrial character of the surrounding area. By having the commercial use at ground level, the residential would be raised above those uses, giving a degree of separation and maintaining the residential amenity of the new flats. The Asda supermarket is located opposite the site, and its chiller units are located on the Ossory Road side of the supermarket site. In order to ensure that “agent of change” principles are applied, the applicant has assessed noise conditions in the flats by XCO2 (see paragraph 202 below) and a condition will require the details of any acoustic insulation and associated ventilation to be submitted and agreed by the council before works begin on site. In terms of the impact of the new residential on existing residential neighbours that is considered below.

Daylight and sunlight impacts

144. 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

145. 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.
146. 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."
147. The BRE guideline tests undertaken for this daylight assessment are the Vertical Sky Component (VSC) and No Sky Line (NSL). 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.
148. 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

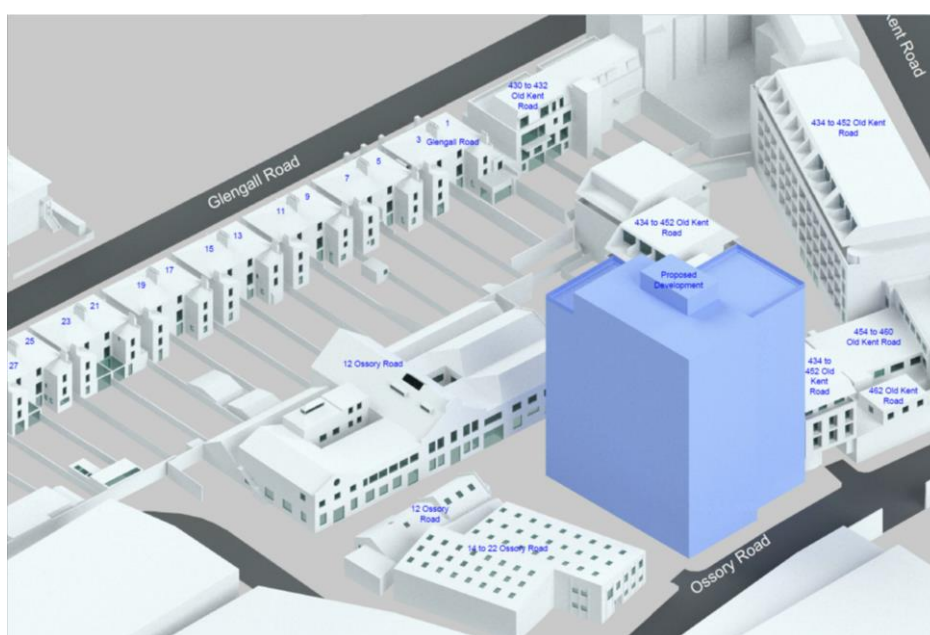
149. In relation to sunlight, the BRE recommends that the Annual Probable Sunlight Hours (APSH) received at a given window in the proposed case should be at least 25% of the total available, including at least 5% in winter. Where the

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

150. 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.'
151. Given the predominantly industrial character along Ossory Road, the residential properties potentially affected by this developed are the occupiers 430 to 432, 434 to 452, 454 to 460 & 462 Old Kent Road, and nos. 1-27 Glengall Road. The following paragraphs analyse the daylight and sunlight impacts for the neighbouring buildings

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



Daylight and sunlight impacts

152. The properties are located to the north and north west of the site with each residential dwelling having windows serving habitable spaces that face the proposal and have therefore been included within the assessment.
153. The 25 affected windows from the VSC test between nos. 434-452 are already impacted by an existing overhang and/or projection. The BRE guidelines acknowledges that where a window has an overhang or projecting wings on one or both sides of it, a larger relative reduction in VSC may be unavoidable, as the design of the building itself contributes to the poor daylighting for the affected properties. The guidelines states that to one way to demonstrate this is to test the windows without the existing obstruction in place. Therefore, an additional calculation has been undertaken with the results specifying that without wings or overhangs in place, 13 of the 25 windows would surpass the BRE criteria (windows 192, 202, 221 to 225, 265 to 267, 269, 270 & 273). The VSC test for these properties demonstrates that the development would result in a lower impact on the affected windows than the existing overhangs and wings. Of the remaining 12 windows (post the additional analysis above), 10 of these windows fall only slightly short of the recommended VSC target (Before/after ratios of between 0.7 to 0.79 – against the BRE target of 0.8).

Images: Location of windows 192, 202, 221-225,



Image: Location of windows 265-267, 269, 270 and 273



154. The APSH test shows that all of the windows that face within 90 degrees of due south have been tested for direct sunlight. The habitable room windows pass both the total annual sunlight hours test and the winter sunlight hours test with the exception being for 10 windows at 434 to 435 Old Kent Road. As with the VSC test detailed above, these windows are already hampered by an overhang and/or projecting wing. The same additional calculation has been undertaken for sunlight and the results demonstrate that without the wings/overhangs in place, five of the ten windows would surpass the BRE criteria (windows 192, 211 & 216 to 218).

Image: Location of windows 192, 211, and 216-218



155. The results of the overshadowing test demonstrate that only four of the 25 gardens tested fall short of the recommendations. Whilst the test indicates that these gardens do not achieve ideal levels of sunlight, there are existing mitigating effects to consider. Of the four gardens, three are relatively small, and it is quite often not practical for small gardens to meet the 21 March two-hour sunlight recommendation. The reason for this is that small gardens, by their nature, are tightly enclosed. This is because a small garden is often close to a boundary fence, or a neighbouring building which casts a shadow over significant areas of the garden at ground level. Notwithstanding the above, considering that 21 of the 25 gardens will enjoy good levels of sunlight in accordance with the BRE gardens and open space test, it is considered on balance that the results in this instance are acceptable.

Image: Existing natural daylight into garden spaces



Image: Proposed natural daylight into garden spaces



Daylight and sunlight conclusions

156. The proposed development will have an impact on the light receivable to neighbouring properties along Old Kent Road, and also to sunlight to garden areas, particularly to those on Old Kent Road. The dwellings on the eastern side of Glengall Road were not tested for daylight/sunlight impacts due to their distance from the development; however, potential overshadowing and sunlight loss to garden amenity spaces were tested as shown in the diagram above. The transient shadowing analysis undertaken for the dwellings along Glengall Road shows that there will be some loss of sunlight in the morning summer hours due to the shadow cast. However, the analysis demonstrates that the amount of sunlight available is compliant with BRE guidelines for having at least two hours of light on 21 March.

157. The assessment undertaken demonstrates that the non-compliance with the BRE recommendations for residential properties is restricted to properties at nos. 434-452 Old Kent Road. On balance, officers are satisfied that the scheme achieves an adequate level of compliance with the BRE recommendations, and due to the existing mitigating factors mentioned in this assessment, the loss of daylight or sunlight from the development is on balance not substantial enough to warrant a reason to refuse this application.

Overlooking of neighbouring properties

158. In order to prevent harmful overlooking, the Residential Design Standards SPD requires proposed developments to achieve a distance of 12m between the front elevations of buildings and/or across a highway, and a minimum of 21m between rear elevations.
159. East of the subject site across Ossory Road sits the Asda superstore, which is in excess of 12m distance and in commercial use. As such, no unacceptable overlooking of these premises will occur. To the south of the site is the Hireman building located at 14-22 Ossory Road. It is separated from the subject site by a cobbled highway. This building is currently in use for commercial purposes, however, the site has received planning permission (19/AP/7610) for a mixed use redevelopment consisting of a part 10/part 11 storey building that includes residential accommodation from second floor and above. The application scheme would maintain a 15m minimum distance to the closest habitable rooms should the Hireman scheme be built to its northern boundary line. In pre-application discussions on that site planning officers have sought to ensure that the internal layout of the flats minimises direct overlooking between the two developments. Given the above, it is therefore considered that the 15m separation distance is acceptable.
160. The bottling plant factory lies immediately to the West of the Application Site and the New Southwark Plan seeks to retain this as SIL. Given its' ongoing industrial use, overlooking is not an issue. The subject site is a minimum of 65 metres from the closest habitable windows to the rear of the properties on Glengall Road. During public consultation on the scheme some objection comments referenced potential overlooking to properties on Glengall Road. Given the considerable separation distance, the degree of overlooking is considered to be limited and therefore acceptable.
161. There are no windows located in the nearest adjoining property at 2B Ossory Road, located to the North of the subject site. One secondary window and one window serving the communal hallway are proposed in the Northern flank elevation, which is to be obscure glazed, and a condition reflecting this is attached to the decision notice. In light of the above assessment, no detrimental overlooking opportunities would occur from this development.

Transport considerations

162. 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.
163. 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.
164. The Mayors Transport Strategy (MTS) includes three strategic challenges that are of significant importance to assessing this application:
 - Good growth
 - New homes and jobs
 - A good public transport experience
165. 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.
166. 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

Proposed site layout

167. The proposed site layout will improve the walking experience. 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.

Trip generation

168. The proposed scheme will; generate largely sustainable methods of trips it is estimated that motorised vehicle trips will be average 28 per day.

Servicing and delivery

169. Delivery and servicing for the proposed residential and light industrial uses will be undertaken on-street from Ossory Road, along the frontage of the site. Waiting restrictions in the form of single/double yellow lines, or a loading bay along the sites frontage could be introduced to allow delivery and servicing vehicles to stop along the sites frontage unimpeded. Refuse collection will take place on-street on Ossory Road. Residential refuse will be collected by LBS's waste collection team. The refuse vehicle will stop on street along the frontage of the site by the residential refuse store entrance, as shown in Drawing 31123/AC/016_B. The refuse store is located within 10m of the collection point on Ossory Road and will be wheeled to the back of the refuse vehicle by the council's waste operatives as part of their existing rounds.
170. Collection of the light industrial waste will be undertaken by private waste contractors. The private waste contractors will also stop along Ossory Road, and will wheel the refuse bins from the commercial bin store to the back of the refuse vehicle. It is estimated that the site will generate in the region of 28 deliveries per day.
171. 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 floorspace. In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, this is not intended as a financial penalty, but as a means of mitigating any harmful impacts from the proposed development and ensuring a better quality of life for current and future residents. As such, it is considered to meet the CIL Regulations 122 test, in that it would be:
 - i. Necessary to make the development acceptable in planning terms;
 - ii. Directly related to the development; and
 - iii. Fairly and reasonably related in scale and kind to the development
172. The proposal is for the management of the new development to monitor the daily vehicular activity of the site both commercial and residential accommodation, quarterly for a period of two years from 75% occupancy. If the site meets or better its own baseline target the bond will be returned within six 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 £12,200.00 based on the 117 units of residential accommodation and 421sqm of non-residential floorspace. The applicant has agreed to the contribution which can be collected via the legal agreement.

Type	Quantum	Bond Amount
Residential	117	£11,700.00
Non Residential	421sqm	£500.00
Daily Trips	28	£12,200.00

173. 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

174. The site is situated within a designated Controlled Parking Zone (CPZ) 'Trafalgar' Zone 'T' is operational Monday – Friday 08:00 – 18:30, enabling Pay & Display for a maximum of four hours with the exception of zone 'Trafalgar' permit holders. CPZ T extension has been consulted and will include loading and pay and display bays on Ossory Road subject to formal consultation will be in place autumn 2022.
175. The proposed development will be car-free. At this location sufficient evidence demonstrated that if a future resident required blue badge there is capacity for on street provision in the vicinity and this together with the Pocket Homes surveys from their current occupied developments in London have no blue badge car owners. That future disabled residents could be dropped off and collected at kerbside. There will be a S106 obligation that prevents residents and office users of the proposed development from obtaining resident parking permits of the existing CPZ.

Public transport

176. The site is well served by local bus routes. The main bus routes are located on Old Kent Road along the frontage of the Asda store, within a 100-150m walk of the site. There are also services which can be accessed from Trafalgar Avenue which is located 450m to the west of the site. The nearest rail station to the site is South Bermondsey Station which is located circa 1.5km north east of the site, or a 17 minute walk.
177. As a borough Southwark agree 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. Secured by S106.

Active transport

Walking and public realm

178. The application will need to provide for wider footways into the existing carriageway. This will be delivered through the S278 agreement. The development will benefit from the proposals to connect Ossory Road to the proposed linear park, which is part of the green belt proposals across the whole of south London. The linear park will provide a direct link between Burgess Park and Old Kent Road, and further across Southwark.

Cycling

179. The site is located close to Quietways and will benefit from the proposed link to the new linear park. TfL have an aspiration for Healthy Streets for the Old Kent Road but scheme is currently unfunded. Cycle parking for the residential development in accordance with the London Plan 2021 and Southwark minimum cycle parking standards will provide a minimum of 118 secure cycle parking spaces for residents and two secure cycle parking spaces for staff, and a further 14 visitors spaces for both uses.
180. There will be a separate access from Ossory Road to the cycle store. An internal route is provided between the bike store, the residential refuse store and the residential lobby. The cycle parking for the light industrial workspace will also be provided in line with the London Plan 2021 and Southwark standards. The proposed light industrial workspace will provide two secure and covered long stay cycle parking spaces on the ground floor, and two visitor cycle parking spaces in the form of Sheffield stands. An obligation within the S106 is to be secured towards the delivery of a new Cycle Hire Docking Station of £50 per residential unit. In addition to this, a condition is attached to the decision regarding a detailed design of the cycle provision.

Construction

181. The applicant will need to submit a full construction management plan for approval. The Section 106 would secure a detailed Construction and Environmental Management Plan CEMP 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

182. 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 obligations and conditions mentioned in this section of the report.

Archaeology

183. The site is within the 'Bermondsey Lake' Archaeological Priority Zone (APZ), which is designed to protect the palaeological environment and prehistoric archaeology recovered from the shoreline and relict fills of the large Late Glacial Bermondsey Lake and the associated riverine geology and topology. The site is also close to the 'Old Kent Road' APZ, which has the potential to contain features associated with the former route of 'Watling Street', the major Roman road between London and Canterbury. When the New Southwark Plan is adopted, the site will lie within the newly extended 'North Southwark and Roman Roads' Tier 1 Archaeological Priority Area (APA).
184. Saved Policy 3.19 of the Southwark Plan (2007) requires that proposals for development in APZ/As should be accompanied by an archaeological desk-based assessment (DBA) and an evaluation report (the results of digging archaeological trial trenches). The proposed development does not include a basement but has foundations, lift pits and other ground interventions relating to the proposed development will still have an impact on archaeological remains.
185. The council's archaeologist has reviewed the submitted DBA and recommends that prior to any work starting on site it is necessary for the applicant's archaeologist to adequately assess the archaeology likely to be present on site. This includes mapping evidence for the potential course of the roman road by looking at the evidence, and plotting this on a map. This should include the examination of antiquarian sources, there is a great volume of information in Blanche's history of Camberwell concerning the construction of the Grand Surrey Canal and the course of the roman road in this area that can be considered alongside modern archaeological work. This study of the course of the roman road in this area should be included within the WSI required by condition for the archaeological evolution. Should the roman road be present within the site it will be required to be preserved in situ, this can be secured by condition as can any subsequent mitigation works. Conditions recommended by the archaeologists are attached to this decision.

Aviation

186. 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

187. 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.

188. Arqiva did not respond to a consultation letter regarding the development sent on 15/09/2021. It is therefore considered that Arqiva do not have an objection to the proposed development.

Environmental considerations

Wind and microclimate

189. A microclimate is the distinctive climate of a small-scale area and the variables within it, such as temperature, rainfall, wind or humidity may be subtly different to the conditions prevailing over the area as a whole. The main characteristics of microclimates within London are temperatures and wind. As the development does not propose a large area of space between the two buildings, the scheme is not of a scale that could potentially have any significant impact on wind conditions around the site or any adverse effects on pedestrian and residents' comfort.

Fire safety

190. Policy D12 of the London Plan 2021 expects all development proposals to achieve the highest standards of fire safety and to this end requires applications to be supported by an independent Fire Strategy, produced by a third party suitably qualified assessor.
191. The strategies demonstrate how the development would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. The provision of a suitably-sized evacuation lift in the residential core is also proposed in line with Policy D5 of the London Plan. The measures contained within the statements have been secured via planning condition within the decision notice.

Flood risk and water resources

192. 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.
193. The Environment Agency (EA) has reviewed the submitted information in relation to flood risk and has no objection to the proposed development. On the advice of the EA, recommendations attached to this decision include a condition relating to Piling. 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.

194. The council's Flood Risk Team has reviewed the revised Flood Risk Assessment and Drainage and are satisfied with the surface water runoff rates being limited to 1.47l/s which is compliant with the greenfield runoff rates. This results in a significant improvement on the existing runoff rates currently on site. A pre-commencement condition has been attached to the decision notice seeking full details of the proposed surface water drainage system incorporating Sustainable Drainage Systems (SuDS).

Ground conditions and contamination

195. A Phase 2 Environmental Study has been submitted by RSK (Ref: 29909-R02 (02)) dated 16th August 2021. The findings from the report indicate that an additional intrusive site investigation shall be completed with further sampling in previously inaccessible areas (as recommended in the submitted RSK report 29909-R02 (02) of 16th August 2021
196. The council's Environmental Protection Team (EPT) have reviewed the Phase 2 assessment and accordingly recommended the attachment of a condition to require a further site investigation and risk assessment is undertaken. This investigation should include a detailed remediation and/or mitigation strategy to be prepared and submitted. This condition has been included on the draft decision notice.
197. The Environment Agency have reviewed the proposals in relation to contaminated land and made the following recommendation.
198. "We have reviewed the document 'Phase 2 Environmental Study' by RSK (reference 29909-R02 (02)) dated 16th August 2021). The study has indicated the potential for ground contamination to be present and has recommended an additional intrusive investigation to assess this. It should be considered that planning permission should only be granted to the proposed development as submitted if the appropriate planning conditions are attached to the approval.
199. The recommended conditions are included in the draft decision notice.

Air quality

200. 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." An Air Quality Assessment (AQA) was submitted with the application, which considers the air quality impacts arising from the construction and operational use of the development, taking into account all relevant local and national guidance and regulations The AQA concludes that subject to the offered mitigation the effects on air quality during construction and operation are considered to be negligible. EPT Officers agree with the conclusions of the report and raise no objection.

Noise and vibration

201. An environmental noise and impact assessment has been undertaken by XCO2 dated August 2021. The findings of the report indicate that with the appropriate mitigation in the form of the specified glazing and ventilation, internal noise levels within the proposed dwellings will be acceptable. EPT Officers have reviewed the submitted report and raise no objection to the development subject to a list of conditions that should be attached to the planning permission.

Agent of change

202. Where new noise- and other nuisance-generating development is proposed close to residential and other sensitive uses, Policy D13 of the London Plan 2021 requires the proposal, as the incoming 'agent of change', to be designed to mitigate and manage any impacts from existing sources on the future users/occupiers. Developments should be designed to ensure that established noise and other nuisance-generating uses remain viable and can grow without unreasonable restrictions placed on them.
203. An objection to the development has been submitted by the adjacent ASDA site based on the Agent of Change principles. Concerns have been raised from ASDA on the grounds of potential noise disturbance to occupants of the proposed flats from existing operations of the store, and in particular the service yard at the junction of Ossory Road and Old Kent Road. As mentioned earlier in this report the Asda chiller units are also located on this side of the store. The objection comment was received by the council on 08.11.2021.
204. In light of the objection comment received, it is considered that incident sound levels due to typical operations within the Asda service yard are expected to be significantly lower than the ambient sound levels due to the general noise environment, as is demonstrated in the noise assessment report submitted as part of this application. An Acoustic Assessment in line with BS Standard 8233: 2014 has been submitted that demonstrates compliance with acoustics in residential design. In order to reduce noise transfer to the units on the principal elevation of the building, acoustic purge panels have been added, allowing the homes to be ventilated whilst still providing acoustic protection. However, an acoustic survey will need to be undertaken for noise in industrial areas. This is to be secured by condition before acoustic details are agreed.
205. It should be noted that the existing residential premises at 2B Ossory Road are slightly closer to the service yard entrance compared with the closest of the proposed new flats and have an unimpeded view of the majority of the service yard. It is therefore considered that the residential uses would not prejudice their existing operation, subject to details being submitted and approved as set out in the decision notice, and as such is in accordance with London Plan Policy D13.

Sustainable development implications

Energy

206. Policy SI2 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. Policy SI3 require consideration of decentralised energy networks, Policy SI4 deals with managing heat risk and Policy SI5 is concerned with protecting and conserving water resources and associated infrastructure.
207. Policy 13 of the Core Strategy and Saved Policy 3.4 of the Southwark Plan 2007 sets out the borough approach to ensuring that new developments tackle climate change. The approach is generally consistent with London Plan Policies but also requires new commercial developments to meet BREEAM 'Excellent'.
208. As per the carbon emission reduction policies of the London Plan 2021 and local development framework, both the residential and non-residential elements of the proposal would be expected to achieve zero carbon (with offset permitted once an on-site 35% carbon reduction against part L of the Building Regulations 2013 has been achieved). Southwark Council's carbon offset cost is £95 for every tonne of carbon dioxide emitted per year over a period of 30 years. This is the equivalent of £2,850 per tonne of annual residual carbon dioxide emissions.
209. An Energy Assessment and Sustainability Strategy based on the Mayor's hierarchy has been submitted by the applicant. This details how the targets for carbon dioxide emissions reduction are to be met. A combination of 'Be Lean' 'Be Clean' and 'Be Green' measures have been employed in an attempt to achieve the reduction in line with the GLA guidance on preparing energy statements, the Southwark Core Strategy 2011 and the Southwark Sustainable Design and Construction SPD.

Be Lean (use less energy)

210. In line with GLA guidance, gas-boilers with gross efficiency of 89.5% have been included for supply of space heating and hot water for all spaces within the scheme in the SAP and SBEM calculations. At the 'Be Lean' stage, the proposed development meets the GLA target of 10% regulated CO2 emission reductions for the residential portion of the scheme, and a 15% reduction for the non-domestic portion of the scheme. The proposals incorporate a range of passive and active design measures that will reduce the energy demand for space conditioning, hot water and lighting. The regulated carbon saving achieved in this step of the Energy Hierarchy is 11.1% over the site wide baseline level with SAP10 emission factors.

Be Clean (supply energy efficiently)

211. The subject site is located within an area where there are plans for the delivery of a district heat network (SELCHP). A site-wide heat network served by a single

energy centre on site is proposed; a strategy which will 'future proof' the connection of the development to the Peckham/Old Kent Road SELCHP extension. In the event where the proposed development will be constructed prior to the DHN extension becoming available, a communal system plant supplied by high efficiency gas-fired condensing boilers to supply heating and hot water to the dwellings will be implemented. This system will have the ability to be retrofitted to enable the connection to the SELCHP extension and wider district heating network when it becomes available. The regulated carbon saving achieved in this step of the Energy Hierarchy is 55.4% over the site wide baseline levels with SAP10 carbon factors.

Be Green (Low or Carbon Zero Energy)

212. The renewable technologies feasibility study carried out for the development identified photovoltaics (PV's) as a suitable option for the development. The PV's shall comprise 6.5kWp (43m²) of horizontal roof mounted arrays. The PV array will be connected to the domestic part of the development. The panels are considered to generate significant carbon savings, whilst having minimal impact on the appearance of the building and no adverse impact on the amenity of neighbouring buildings.
213. The estimated cumulative CO₂ savings on site are 68.8% for the residential and 59.8% for the commercial elements of the developments against SAP10 carbon factors. With the SAP10 carbon factors, to achieve 'zero carbon' for the residential portion of the scheme, 24.1 tonnes per annum of regulated CO₂, equivalent to 723.6 tonnes over 30 years. The shortfall to a zero carbon from baseline for the new build non-domestic portion of the scheme would be 1.3 tonnes per annum of regulated CO₂, equivalent to 38.9 tonnes over 30 years. A Carbon Offset payment of £69,540 will be paid to reach 'Zero Carbon'. This payment will be secured through the S106 Agreement.

Overheating

214. London Plan Policy SI4 and Policy P68 of the NSP set out the cooling hierarchy that should be followed when developing a cooling strategy for new buildings. The six-step hierarchy is as follows:
 - Minimise internal heat generation through energy efficient design; then
 - Reduce the amount of heat entering the building through the orientation, shading, albedo, fenestration, insulation and green roofs and walls; then
 - Manage the heat within the building through exposed internal thermal mass and high ceilings; then
 - Use passive ventilation; then
 - Use mechanical ventilation; then
 - Use active cooling systems (ensuring they are the lowest carbon options).
215. The potential risk of overheating will be mitigated by incorporating both passive and active design measures. The space heating and hot water to both the domestic and non-domestic elements of the development will be provided by a

communal system linked to the DHN. Before the connection is available heat and hot water will be provided by high efficiency gas boilers. All heat sources and pipe work will be sufficiently insulated to avoid excess heat loss into internal space.

216. Efficient lighting will be used to further minimise internal heat gains and reduce energy expenditure. Appropriately sized windows will reduce solar heat gains. Glazing with low transmittance will be used throughout the development to reduce solar gains and reduce the risk of overheating. The dwellings have allowed for passive ventilation as a strategy for providing fresh air and dissipating heat. Acoustically treated ventilation panels will be incorporated in the bedrooms overlooking Ossory Road to allow for purge ventilation while avoiding high noise levels.
217. Overall, the assessment shows that the residential portion of the scheme will meet the overheating criteria under DSY1 weather scenario with the proposed design. Overheating risk for the non-domestic space have been reduced as far as feasible, and artificial cooling is recommended to enable full compliance with TM52. The non-residential unit is being designed as shell and core and the air source heat pumps are recommended to be installed as part of tenant fit out.

Whole life cycle and carbon capture

218. London Plan Policy SI2 requires a calculation of whole life cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment (WLCA). This captures a development's unregulated emissions, its embodied emissions and the carbon impact of mid-life maintenance and end- of-life dismantling.
219. To further reduce carbon emissions over the lifecycle of the building, low embodied carbon materials will be used as far as practically possible, whilst also focusing on design practices to reduce waste production.
220. A condition is attached to the decision notice regarding an updated Whole Life-Cycle (WLC) Carbon Assessment demonstrating compliance with Part F of Policy SI 2 - Minimising greenhouse gas emissions of the London Plan 2021. The final wording of the condition will be agreed with the GLA during the Stage 2 process post committee.

Circular economy statement

221. Policy GG5 of the London Plan 2021 promotes the benefits of transitioning to a circular economy as part of the aim for London to be a zero-carbon city by 2050. Policy D3 requires the principles of the circular economy to be taken into account in the design of development proposals in line with the circular economy hierarchy. Policy SI7 requires referable applications to develop circular economy statements.

222. The submitted Economy Statement demonstrates the sustainability measures incorporated into the design of the development, and outlines the adoption of circular economy principles throughout the design, construction and operation of the proposed development. Through the incorporation of fundamental sustainability principles, the proposed development has:

- Designed out the need for building components and materials;
- Use of reclaimed materials and remanufactured components over new;
- Product selection considering its entire lifecycle, such as products which can be remanufactured or reused; products with high recycled content; products designed for disassembly; and recyclable or compostable materials.

223. A Post Completion Circular Economy Report condition has been attached to this decision. The final wording of the condition will be agreed with the GLA during the Stage 2 process post committee.

BREEAM

224. Strategic Policy 13 of the Core Strategy requires commercial units to achieve BREEAM “Excellent”. New Southwark Plan Policy P68 to provide BREEAM assessment on commercial units of 500sqm or more. As the proposed commercial unit is 421sqm in floor space, the development falls below the threshold identified in NSP P68 for non-residential development.

Water efficiency

225. For the residential aspect of the development, the applicant’s Energy Assessment and Sustainability Strategy confirms that the dwellings would have a maximum indoor water consumption of 105 litres per person per day, in line with the optional standard in Part G of the Building Regulations. This will be achieved through the provision of efficient water fittings throughout the development, including aerated shower heads and taps (also helping to reduce hot water demand), dual flush toilets, and low water consumption appliances where provided. Therefore the development complies with Policy SI5 of the London Plan 2021.

Digital connectivity infrastructure

226. The NPPF recognises the need to support high-quality communications infrastructure for sustainable economic growth and to enhance the provision of local community facilities and services. To ensure London’s long-term global competitiveness, Policy SI6 (Digital Connectivity Infrastructure) of the London Plan 2021 requires development proposals to:

- be equipped with sufficient ducting space for full fibre connectivity infrastructure;
- achieve internet speeds of 1GB/s for all end users, through full fibre connectivity or an equivalent.

- meet expected demand for mobile connectivity; and
- avoid reducing mobile capacity in the local area.

227. A pre-commencement is attached to the decision notice that requires detailed plans to be submitted to and approved in writing by the Local Planning Authority demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development. This is in line with the requirements of Policy SI6 of the London Plan 2021.

Planning obligations (section 106 undertaking or agreement)

228. Saved Policy 2.5 of the Southwark Plan and Policy DF1 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

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

Table: Section 106 Financial Obligations

Planning obligation	Mitigation	Applicant's position
Local Economy and Workspace		
Employment and training (during construction)	<ul style="list-style-type: none"> • 15 sustained jobs for unemployed Southwark residents during the construction phase of the development. Where this is not possible to meet this requirement, a charge of £4,300 per job not provided will be applied; • 15 Southwark residents trained in pre- or post-employment short courses. Where this is not 	Agreed

	<p>possible to provide a payment a charge of £150 per resident will be applied;</p> <ul style="list-style-type: none"> 3 new apprenticeship start or in work NVQ. Where this is not possible to provide a payment a charge of £1,500 per apprenticeship will be applied. 	
Employment and enterprise	Allow for local procurement and supply chain measures during construction and after construction.	Agreed
Housing and Viability		
Wheelchair Units	12 Wheelchair accessible are to be provided.	Agreed
Management Plan	Management, operation and promotion strategy to be submitted and agreed prior to occupation.	Agreed
Transport and Highways		
Public Transport Infrastructure Contribution	Contribution towards the improvement of local bus stops (up to a maximum of £315,900 (£2,700 x 117)).	Agreed
Highway works	<ul style="list-style-type: none"> A detailed Construction Management Plan (CMP) and a £40 per unit (£4,680) contribution for Construction Management within the OKR AAP area. This is for the council to manage cumulative impacts on the highways and environment. A detailed Delivery and Service Plan (DSP) and a DSP Bond calculated at £100 per residential unit and £100 per 500 sqm non-residential (£12,200) 	Agreed

	<ul style="list-style-type: none"> • A contribution towards the provision of a TfL Cycle Hire Docking Station (£5,850) • This would be made available to TfL for a period up to five years subject to evidence of need. • s.278 works with the highway authority for highway works, tree planting and traffic management change. 	
Parking permit restriction	This development would be excluded from those eligible for car parking permits under any future CPZ operating in this locality.	Agreed
Energy, Sustainability and the Environment		
Futureproofing for connection to District Heat Network (DHN)	Prior to occupation, a CHP Energy Strategy must be approved setting out how the development will be designed and built so that it will be capable of connecting to the District CHP in the future.	Agreed
Achieving net carbon zero	an off-set payment of £69,540	Agreed
Archaeology monitoring/supervision fund	Contribution towards cost of providing technical archaeological support (£6,778 for schemes under 10,000sqm)	Agreed
Open Space	A contribution of £226,217.50 for open space shortfall on site	Agreed
Administration fee	Maximum contribution to cover the costs of monitoring these necessary planning obligations, calculated as 2% of total sum	Agreed

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

- Affordable housing provisions and delivery controls;

- Site management plan;
- Employment, Skills and Business Support Plan (Construction Phase);
- 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;
- Securing Hawkins\Brown Architects or similar architects to deliver the building detailed design, unless otherwise agreed in writing

231. The S106 heads of terms agreed would satisfactorily mitigate against the adverse impacts of the proposed development.
232. In the event that a satisfactory legal agreement has not been entered into by 2 August 2022, it is recommended that the Director of Planning and Growth 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), and London Plan (2021) policies H4 'Delivering affordable housing' and DF1 'Delivery of the Plan and Planning Obligations', as well as guidance in the council's Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015)”.

S278 Works Outline

233. An S278 agreement will need to be undertaken with Southwark Highways for works to the highway, and traffic management changes.

Mayoral and Southwark Community Infrastructure Levy (CIL)

234. 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.
235. The site is located within Southwark CIL Zone 2 and MCIL2 Band2 zone. Based on the existing floor areas provided in the agent’s CIL Form1 dated 07-Sep-21, the gross amount of CIL (pre-relief) is approximately **£1,886,695.07** consisting £386,295.14 of Mayoral CIL and £1,500,399.93 of Borough CIL. CIL Relief can

be claimed for a number of types of affordable housing, but the tenure Discounted Market Sale of (20% below market value) proposed is not eligible to claim CIL Mandatory Social Housing 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.

Conclusion on planning issues

236. The major redevelopment of the site is supported and welcomed in principle. The principle of housing on the site is also accepted, and would be in line with policy aspirations to increase the number of new homes in the area.
237. The proposed mix of uses would add to the vibrancy of the area which would be complemented the creation of frontages onto Ossory Road that assists in activating the development at street level.
238. The scheme would deliver the following major regeneration benefits:
 - 117 new residential units to the borough's housing stock;
 - 39 affordable intermediate housing
 - The provision of high quality light industrial floorspace;
 - A contribution to parks and open spaces within the OKR, including delivery mechanisms secured through the Section 106;
 - The site will benefit significantly from biodiversity net gain which is 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
239. The proposals would deliver a good standard of accommodation, which would comply with the majority of the standards and principles of exemplary residential design, as set out in Southwark's residential design standards SPD. Whilst the design of the development results in a third of the development being dual aspect, rather than it being predominantly dual aspect owing to the type of accommodation being provided (all 1 bed flats), the key habitable rooms for each flat will be provided with generously portioned windows to maximise the levels of daylight received. Furthermore, all units have access to the communal amenity spaces located on the second, tenth and eleventh floors.
240. The development would reduce car dependency whilst also accommodating a significant uplift in cycle parking on site. 118 cycle spaces are allocated for residents of the scheme whilst 12 visitor cycle spaces are also proposed. Two long stay cycle parking spaces will be provided for commercial users. One Sheffield stand externally in the courtyard, in the south west corner of the building, will provide 2 short stay spaces for cyclists visiting the commercial aspect of the development. The improvements to the public footway along Ossory Road are considered to enhance the public realm whilst also improving the pedestrian experience through comfort and circulation when entering, visiting or moving past the site.

241. The impacts of the scheme on neighbouring properties in relation to daylight and sunlight would on balance not result in detrimental harm to the living conditions of neighbouring occupiers. Furthermore, where the results would not satisfy the BRE Guidelines, the retained levels would be within the range considered acceptable for an urban location.
242. The architectural design is considered to be of a high quality and would significantly improve the site within the context of the surrounding area
243. It is therefore recommended that planning permission be granted subject to conditions, referral to the GLA, and the agreement of a Section 106 Legal Agreement under the terms as set out above.

Statement of community involvement

244. Consultation was carried out by the applicant prior to the submission of the planning, and during the consideration of the application. The consultation undertaken was carried out with the local community and key stakeholders from the area. Revised pre-app meetings took place following Members recommendation to refuse planning permission 20/AP/0009 in October 2020. This is summarised in the tables below, which are taken from the submitted Development Consultation Charter.

Table: List of meetings

Meetings	Date	Attendees	Summary of discussions
Pre application meetings (Southwark Council)	1 pre-application meeting Pre-application meeting date: 24/06/2021	Council Officers	The revised proposals were presented to Officers for both the Ossory Road site and the Credon House site which are now proposed to be linked schemes to provide a mix of market, discounted market sale (intermediate) and social rent housing. The principle of two linked applications was supported by Officers, as was the provision of a mix of tenures. Specific comments relating to the Ossory Road site were focussed on the provision of amenity space and servicing for the commercial space.

			<p>Following this meeting, balconies have been added to all of the market units, as well as the communal amenity space provided at first and tenth floors. Given the size of the commercial unit and the limited number of vehicle movements expected, servicing is proposed on street and will be via a loading bay located immediately adjacent to the Application Site on Ossory Road. The loading bay forms part of the councils future proposals for parking and loading arrangements along Ossory Road.</p>
Vital OKR	18/08/2021	Vital OKR Team	<p>A meeting with the founder of VITAL OKR took place on the 18th August 2021 to discuss the revised proposals for the site. Overall Mr Brearley was supportive of the proposals although noting it was unfortunate that the application scheme resulted in a reduction in light industrial floorspace from the existing unit and the previous scheme. He recognised however that the need to deliver a viable scheme, link 2-10 Ossory Road with Credon House and deliver 50% affordable housing with a policy compliant mix impacted on overall viability.</p>

Table: List of public consultation events carried out

Public consultation events	Date	Attendees	Summary of feedback
Online Webinar	28/07/2021	<p>Invitations were sent to 4,872 local residents and businesses.</p> <p>Specific invitations were sent to:</p> <ul style="list-style-type: none"> • Ward Councillors • Vital OKR • Capital Industries (for Credon) • Small Beer Company (for Credon) • Pocket registrants in Southwark <p>14 people attended the virtual consultation and were able to ask questions throughout and after the presentation via a chat forum. Questions were then answered by Pocket and the design team.</p>	<p>Given the Covid-19 pandemic, this public consultation event was held virtually. Members of the public were presented with an overview of Pocket Living and their delivery of affordable homes alongside details of the proposals and scheme drawings for the revised schemes at 2-10 Ossory Road and Credon House. Members of the design team included Pocket Living, Gort Scott and Hawkins Brown. A Q&A session was held with questions asked about outdoor amenity space, noise impacts, affordability, design and the provision of light industrial space.</p>
Public Website	First available on 16th July 2021 (website is still live)	Details of the website were included on the invites sent to local residents and businesses	A dedicated consultation website has been set up and can be found at https://pocketoldkentroad.com/ . The consultation website provides visitors with the

		inviting them to attend the webinar.	<p>option to view the consultation webinar and submit feedback via an online survey.</p> <p>To date 29 responses have been received from the online survey. The written feedback is strongly positive and can be summarised as follows:</p> <ul style="list-style-type: none"> • Welcoming provision of affordable homes which will be of particular benefit to younger people in London • Requesting more information on how one would purchase a Pocket Home • Supportive of the delivery of 50% affordable homes across the two schemes • Welcoming the opportunity for Southwark residents to buy their own homes, it was considered more developments like this were needed • Supportive of the delivery of high-quality amenity space to encourage social interaction between residents
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Consultations

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

consultation replies

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

Summary of consultation responses

247. This application was subject to a round of statutory consultation in September 2021.

248. At the time of writing, 20 consultation responses had been received from members of the public comprising of eight responses objecting to the proposal, and 12 responses supporting the proposal.
249. The main issue raised by residents objecting to the proposed development are:
- Proposed housing only suitable for single people and not families
 - Proposed units are too small
 - Height of development out of character for the area – height should be six storeys
 - Overshadowing to neighbouring properties resulting in loss of daylight and sunlight to habitable windows and amenity spaces
 - Negative impact on the character of the Glengall Road Conservation Area
250. Officer response: The development has been assessed in depth in the main body of the report above
251. The comments received in support of the application are summarised below:
- The scheme would provide affordable housing choice for people that work locally and are on a single income
 - Building height and design compliant with masterplan
 - On-site communal amenity is beneficial to future residents

GLA

252. The GLA's Stage 1 response considers the principle of development and proposed land uses to be appropriate and generally in compliance with London Plan policies. The design is also considered acceptable. However, the report also raises a few issues whereby more information was required at the planning application stage. Through the application process, these have been addressed, as set out below.
253. Whole Carbon Life Cycle: The applicant is required to update the detailed planning stage tab of the GLA WLC template and provide clarifications on material quantities and other aspects of the assessment.
254. Circular Economy: Additional information relating to bill of materials, recycling and waste reporting and operational waste is required; and a commitment to post-completion reporting, secured by planning condition, is also required.
255. Energy: The development should ensure that the projected and (where possible) further savings are achieved, and the proposed PV strategy should be revisited with an aim to maximising PV provision. Connection to the SELCHP is also required and the applicant must agree to the maximum timescale for reliance on temporary gas boiler plant.
256. Officer Response: The applicant has submitted the whole life cycle carbon assessment, circular economy statement and GLA reporting energy memo

during the application in response to the stage 1 report from GLA, and will continue discussions with the GLA post committee

TfL

- 257. Cycle Parking: Should be designed in accordance with London Cycle Design Standards (LCDS), which is also required as part of Policy T5.
- 258. Officer Response: The wording of the above grade cycle design condition attached requires the proposed cycle storage to be in line with LCDS.
- 259. Docking Station: an appropriate contribution towards the provision of a cycle hire docking station should be secured through the S106 agreement, along with free membership.
- 260. Officer Response: This is to be secured in the S106 Agreement
- 261. Delivery and Service Plan: A full DSP should be secured by condition in line with Policy T7 of the London Plan. This should be prepared in accordance with TfL guidance, detailing the measures that will be implemented to mitigate the impact of delivery and servicing.
- 262. Officer Response: Within the OKROA, the DSP is secured through a bond contribution within the S106 Agreement.
- 263. Construction Plan: A full Construction Logistics Plan (CLP) should be secured by condition, in line with Policy T7. This should be prepared in line with TfL guidance and provide detail on how the construction will minimise impact on the surrounding transport network and adhere to the Mayor's Vision Zero approach.
- 264. Officer Response: A CEMP and DEMP is secured through the S106 Agreement. Along with a £40 per unit (£4,680) contribution for Construction Management within the OKR AAP area. This is for the council to manage cumulative impacts on the highways and environment.

London Underground

- 265. No comments to make on the application.

Metropolitan Police

- 266. The Designing Out Crime Officer has advised that they have not yet met with the applicants but are confident 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.
- 267. Officer response: The recommended conditions are included with this recommendation.

Natural England

268. No comments to make on the application.

Environment Agency

269. No objection to the development subject to conditions being attached to the decision notice.

Historic England (HE)

270. Historic England raises no objection to the scheme

Arqiva

271. Arqiva did not respond to a consultation letter sent to them dated 15.09.2021

Thames Water

272. On the basis of information provided, Thames Water do not object to the development and advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
273. Officer response: The recommended informatives have been attached to this decision notice of this application.

Network Rail

274. Network rail have no comments to make on this application.

Health and Safety Executive

275. HSE Officers recommend that since the application of MSVS and automatic opening vents (AOVs) is proposed in the Fire Statement. The corridors will be dependent on the outcome of a computational fluid dynamic (CFD) analysis with regards to the safety of people using the corridors in the event of a fire.

Internal consultees

276. The advice received from other Southwark Officers has been summarised throughout this report.

Community impact statement / Equalities Assessment

277. 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.
278. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.
279. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights
280. 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

281. The subject site has been subject to one relevant application of note which is detailed below:

18/EQ/0369

‘Redevelopment of the site for a residential-led mixed-use development within a part 10 part 16 storey building containing 117 affordable units (102 1B1P AND 15 2B3P units)’

Decision: Closed

20/AP/0009

‘Demolition of existing building and redevelopment of the site to construct a part two, part ten, part eleven storey building comprising of 105 units (Use Class C3), light industrial space (Use Class B1), service yard, cycle storage and associated plant rooms’

Decision: Committee Members recommended to refuse application based on lack of social rent units in the proposal, and lack of private amenity space

Pre-application advice

282. Additional Pre-application advice was provided in advance of the submission of this application, following on from the recommendation from Committee Members for the development under reference 20/AP/0009. A number of meetings were held with the applicant and discussions centred on the provision of affordable housing, the height and massing of the proposals, the linking of the development with the Credon House redevelopment to provide Affordable Workspace, family rented social units, and intermediate market units. Additionally, the amenity space, quality of the residential accommodation and potential impacts upon surrounding occupiers were discussed during the pre-application stage.

Planning history of adjoining sites

283. The council has received a number of planning applications recently in the Old Kent Road Opportunity Area. These include the following:
284. 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 five residential units (3 x 2-bedroom and two studio flats) on upper floors.

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

285. 17/AP/2773 Malt Street Regeneration Site, Land Bounded By Bianca Road, Latona Road, Haymerle Road, Frensham Street, and Malt Street

Application type: FULL and OUTLINE

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

Detailed Component (Phase 1):

Full planning permission for the demolition of existing buildings and structures and redevelopment of the central area for the erection of a total of four 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 floorspace 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 floorspace 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: Planning permission granted (30th October 2020).

286. 18/AP/0897 Ruby Triangle Site, Land bounded by Old Kent Road, Ruby Street and Sandgate Street

Application type: FULL

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

Decision: Granted planning permission (6 June 2019)

287. 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 (5 March 2019).

288. 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: Planning permission granted (13 May 2020).

289. 19/AP/7610 14-22 Ossory Road

Application type: FULL

Demolition of the existing building and redevelopment of the site to deliver a building of part-ten part-eleven 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.

Decision: Planning permission granted (5th November 2021).

Planning policy

290. The statutory development plans for the Borough comprise the National Planning Policy Framework 2021, London Plan 2021, 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

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

- The Old Kent Road Opportunity Area;
- Draft OKR AAP site OKR 10;
- 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

292. 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

293. The revised National Planning Policy Framework ('NPPF') was published in July 2021 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.

294. Paragraph 218 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.

295. 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

296. National Planning Policy Guidance (2014) is a web-based resource which brings together planning guidance on various topics into one place.

London Plan 2021

297. On 2 March 2021, the Mayor of London published the London Plan 2021. The spatial development strategy sets a strategic framework for planning in Greater London and forms part of the statutory Development Plan for Greater London. The relevant policies are:
298. Policy SD1 - Opportunity Areas
 Policy SD2 - Collaboration in the Wider South East
 Policy SD3 - Growth locations in the Wider South East and beyond
 Policy SD6 - Town centres and high streets
 Policy SD7 - Town centres: development principles and Development Plan Documents
 Policy SD10 - Strategic and local regeneration
 Policy D1 - London's form, character and capacity for growth
 Policy D2 - Infrastructure requirements for sustainable densities
 Policy D3 - Optimising site capacity through the design-led approach
 Policy D4 - Delivering good design
 Policy D5 - Inclusive design
 Policy D6 - Housing quality and standards
 Policy D7 - Accessible housing
 Policy D9 - Tall buildings
 Policy D11 - Safety, security and resilience to emergency
 Policy D12 - Fire safety
 Policy D13 - Agent of Change
 Policy D14 - Noise
 Policy H1 - Increasing housing supply
 Policy H2 - Small sites
 Policy H4 - Delivering affordable housing
 Policy H5 - Threshold approach to applications
 Policy H6 - Affordable housing tenure
 Policy H7 - Monitoring of affordable housing
 Policy H9 - Ensuring the best use of stock
 Policy H10 - Housing size mix
 Policy H11 - Build to Rent
 Policy S1 - Developing London's social infrastructure
 Policy S4 - Play and informal recreation
 Policy E1 - Offices
 Policy E2 - Providing suitable business space
 Policy E3 - Affordable workspace
 Policy E9 - Retail, markets and hot food takeaways
 Policy E11 - Skills and opportunities for all
 Policy HC3 - Strategic and Local Views
 Policy HC4 - London View Management Framework
 Policy G1 - Green infrastructure
 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 6 - Digital connectivity infrastructure
 Policy SI 7 - Reducing waste and supporting the circular economy
 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 T6.5 - Non-residential disabled persons parking
 Policy T7 - Deliveries, servicing and construction
 Policy T9 - Funding transport infrastructure through planning

299. The London Plan 2021 identifies the Old Kent Road as an Opportunity Area with significant potential for residential and employment development with an indicative capacity for 12,000 new homes and 5,000 new jobs. Opportunity Areas are described in the London Plan (2021) are identified as significant locations with development capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility.

Mayoral SPGs

300. The following Mayoral SPGs are relevant to the consideration of this application:
301. 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

302. 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 5 - Providing new homes
 Strategic policy 6 - Homes for people on different incomes
 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

303. 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)

304. 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)
 Heritage SPD (2021)

Emerging planning policy

New Southwark Plan

305. The New Southwark Plan is now at an advanced stage. The New Southwark Plan (NSP) was submitted to the Secretary of State in January 2020. The Examination in Public (EiP) for the NSP took place between February and April 2021. The Inspectors wrote a post hearings letter on 28 May 2021 and under Section 20(7)(c) of the Planning and Compulsory Purchase Act (2004) the council asked the Inspectors to recommend Main Modifications to ensure the Plan is sound. The council consulted on the Main Modifications as recommended by the Inspectors from 6 August 2021 to 24 September 2021.
306. It is anticipated that the plan will be adopted in February 2022 and will replace the saved policies of the 2007 Southwark Plan, the 2011 Core Strategy, the Aylesbury Area Action Plan 2010, the Peckham and Nunhead Area Action Plan 2014 and the Canada Water Area Action Plan 2015.
307. 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)

308. 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 five years, with a first draft published in 2016. The December 2020 draft version was consulted on from 11 January 2021 to 10 May 2021. As the document is still in draft form, it can only be attributed limited weight.
309. 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 10 which covers the area bounded by Ossory Road, Latona Road and the Cantium Retail Park Requirements for this allocation site include the re-provision of existing industrial floorspace, and to provide residential accommodation in Use Class C3, and the provision of Affordable Workspace.

Environmental impact assessment

310. The scheme was not considered to be of sufficient scale and impact to require an Environmental Impact Assessment (EIA) to be carried out in accordance with Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Human rights implications

311. 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.
312. 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

313. None.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file 2385-22 Application file 21/AP/3246 Southwark Local Development Framework and Development Plan Documents	Chief Executive Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov. uk Case officer telephone: 0207 525 1513 Council website: www.southwark.gov.uk

APPENDICES

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

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth		
Report Author	Troy Davies, Team Leader		
Version	Final		
Dated	20 January 2022		
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			20 January 2022

APPENDIX 1**Recommendation (draft decision notice)**

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	POCKET LIVING OSSORY ROAD LIMITED	Reg. Number	
Application Type	Full Planning Application		
Recommendation	Grant subject to Legal Agreement	Case Number	21/AP/3246

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

Demolition of the existing building and construction of a part one, part ten and part eleven storey building (42.65M AOD) comprising up to 421sqm of Class E floorspace at ground floor and up to 117 homes (Class C3). Provision of ancillary plant, amenity spaces, cycles and refuse 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: 2-10 OSSORY ROAD, LONDON, SE1 5PA

In accordance with application received on 15/09/2021

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

PLOR-HBA-01-00-DR-A-080050 REV P2 - PROPOSED SITE PLAN
 PLOR-HBA-01-00-DR-A-080100 REV P2 - GROUND FLOOR PLAN
 PLOR-HBA-01-01-DR-A-080101 REV P2 - LEVEL 01 FLOOR PLAN
 PLOR-HBA-01-02-DR-A-080102 REV P2 - LEVEL 02 FLOOR PLAN
 PLOR-HBA-01-03-DR-A-080103 REV P1 - LEVEL 03 FLOOR PLAN

PLOR-HBA-01-04-DR-A-080104 REV P1 - LEVEL 04 FLOOR PLAN
 PLOR-HBA-01-05-DR-A-080105 REV P1 - LEVEL 05 FLOOR PLAN
 PLOR-HBA-01-06-DR-A-080106 REV P1 - LEVEL 06 FLOOR PLAN
 PLOR-HBA-01-07-DR-A-080107 REV P1 - LEVEL 07 FLOOR PLAN
 PLOR-HBA-01-08-DR-A-080108 REV P1 - LEVEL 08 FLOOR PLAN
 PLOR-HBA-01-09-DR-A-080109 REV P1 - LEVEL 09 FLOOR PLAN
 PLOR-HBA-01-10-DR-A-080110 REV P2 - LEVEL 10 FLOOR PLAN
 PLOR-HBA-01-11-DR-A-080111 REV P2 - LEVEL 11 FLOOR PLAN
 PLOR-HBA-01-ZZ-DR-A-080200 REV P3 - PROPOSED EAST ELEVATION
 PLOR-HBA-01-ZZ-DR-A-080201 REV P3 - PROPOSED SOUTH ELEVATION
 PLOR-HBA-01-ZZ-DR-A-080202 REV P3 - PROPOSED WESTERN ELEVATION
 PLOR-HBA-01-ZZ-DR-A-080203 REV P3 - PROPOSED NORTH ELEVATION
 PLOR-HBA-01-ZZ-DR-A-080300 REV P2 - PROPOSED SECTION AA
 PLOR-HBA-01-ZZ-DR-A-080301 REV P2 - PROPOSED SECTION BB
 PLOR-HBA-01-ZZ-DR-A-080302 REV P2 - PROPOSED SECTION CC
 PLOR-HBA-01-ZZ-DR-A-080501 REV P1 - TYPICAL UNIT LAYOUT - TYPE 01
 PLOR-HBA-01-ZZ-DR-A-080502 REV P1 - TYPICAL UNIT LAYOUT - TYPE 02
 PLOR-HBA-01-ZZ-DR-A-080503 REV P1 - UNIT LAYOUT - TYPE 03 WCA
 PLOR-HBA-01-ZZ-DR-A-080504 REV P1 - UNIT LAYOUT - TYPE 04 WCA
 PLOR-HBA-01-10-DR-A-080505 REV P1 - UNIT LAYOUT - TYPE 05 WCA

Reason:

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

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

Reason:

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

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

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

Reason: In order that the 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 2021.

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

Reason: In order that the details of the programme of works for the archaeological mitigation are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site in accordance with Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and the National Planning Policy Framework 2021.

- 5 Before any work, hereby authorised, excluding demolition to ground slab level, archaeological evaluation and site investigation works, begins, the applicant shall submit a detailed scheme showing the complete scope and arrangement of the basement and foundation design, and all associated subterranean groundworks, including the construction methods. The submitted documents should show how archaeological remains will be protected by a suitable mitigation strategy. The detailed scheme will need to be approved in writing by the Local Planning Authority and the development shall only be carried out in accordance with the approval given.

Reason: In order that all below ground impacts of the proposed development are known and an appropriate protection and mitigation strategy is achieved to preserve archaeological remains by record and/or 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 2021.

- 6 Prior to the commencement of development, including demolition, an updated Circular Economy Statement demonstrating compliance with Part B of Policy SI 7 'Reducing waste and supporting the circular economy' of the London Plan 2021 and including measures for monitoring and reporting against the targets within the Circular Economy Statement shall be submitted and approved in writing by the Local planning Authority. The assessment shall develop a strategy for the implementation of circular economy principles in both the approved building's and wider site's operational phase, in addition to developing an end-of-life strategy for the development according to circular economy principles, including disassembly and deconstruction.

Reason:

To promote resource conservation, waste reduction, material re-use, recycling and reduction in material being sent to land fill in compliance with Policy SI 7 of the London plan 2021.

- 7 No works (excluding demolition and site clearance) shall commence until full details of the proposed surface water drainage system incorporating Sustainable Drainage Systems (SuDS) have been submitted to and approved in writing by the Local Planning Authority, including detailed design, size and location of attenuation units and details of flow control measures. The strategy should achieve a reduction in surface water runoff rates during the 1% Annual

Exceedance Probability (AEP) event plus climate change allowance, as detailed in the *Flood Risk Assessment* (report reference: P450200-REP-C-002-FRA, dated 31/08/2021, rev. B), *Drainage Strategy* (report reference: P450200-REP-C-001, rev. 03, dated 27 September 2021) and *SuDS - Response to Planning Comment* (dated 12/01/2022, dated rev. P1) prepared by Whitby Wood. The applicant must demonstrate that the site is safe in the event of blockage/failure of the system, including consideration of exceedance flows.

Reason: To minimise the potential for the site to contribute to surface water flooding in accordance with Southwark's Strategic Flood Risk Assessment (2017) and Policy SI 13 of the London Plan (2021).

- 8
 - a) Prior to the commencement of development works, intrusive site investigation shall be completed with further sampling in previously inaccessible areas (as recommended in the submitted RSK report 29909-R02 (02) of 16th August 2021) and associated risk assessment shall be completed to fully characterise the nature and extent of any contamination of soils and ground water on the site.
 - b) In the event that contamination is found that presents a risk to future users or controlled waters or other receptors, a detailed remediation and/or mitigation strategy shall be prepared and submitted to the Local Planning Authority for approval in writing. The strategy shall detail all proposed actions to be taken to bring the site to a condition suitable for the intended use together with any monitoring or maintenance requirements. The scheme shall also ensure that as a minimum, the site should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. The approved remediation scheme (if one is required) shall be carried out and implemented as part of the development.
 - c) Following the completion of the works and measures identified in the approved remediation strategy, a verification report providing evidence that all works required by the remediation strategy have been completed, together with any future monitoring or maintenance requirements shall be submitted to and approved in writing by the Local Planning Authority.
 - d) In the event that potential contamination is found at any time when carrying out the approved development that was not previously identified, it shall be reported in writing immediately to the Local Planning Authority, and a scheme of investigation and risk assessment, a remediation strategy and verification report (if required) shall be submitted to the Local Planning Authority for approval in writing, in accordance with a-d 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 2021.

- 9 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:

- o A detailed specification of demolition and construction works at each phase of development including consideration of all environmental impacts and the identified remedial measures;
- o Site perimeter continuous automated noise, dust and vibration monitoring;
- o 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.;
- o 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.)
- o 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.;
- o Site waste Management - Accurate waste stream identification, separation, storage, registered waste carriers for transportation and disposal at appropriate destinations.
- o 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:-

- o Southwark Council's Technical Guide for Demolition & Construction at <http://www.southwark.gov.uk/construction>
- o Section 61 of Control of Pollution Act 1974,
- o The London Mayors Supplementary Planning Guidance 'The Control of Dust and Emissions During Construction and Demolition',
- o 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',
- o BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Noise',
- o BS 5228-2:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Vibration'
- o BS 7385-2:1993 Evaluation and measurement for vibration in buildings. Guide to damage levels from ground-borne vibration,
- o BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings - vibration sources other than blasting,
- o 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 (2021).

- 10 Details of access for fire appliances as required by part 5B of the Building Regulations and details of adequate water supplies for fire fighting purposes should be provided prior to the implementation of the scheme and should be secured in perpetuity on completion of the scheme.

Reason: To meet the requirements for fire safety set out in policy D12 of the London Plan 2021

- 11 Prior to commencement of any works (with the exception of demolition to ground level and archaeology), detailed plans shall be submitted to and approved in writing by the Local Planning Authority demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development. The development shall be carried out in accordance with the approved plans and maintained as such in perpetuity.

REASON:

To provide high quality digital connectivity infrastructure to contribute to London's global competitiveness, in accordance with: the National Planning Policy Framework 2021, and; Policy SI 6 (Digital Connectivity Infrastructure) of the London Plan 2021.

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

Reason:

To ensure that the development does not harm groundwater resources in line with the National Planning Policy Framework (NPPF) (Paragraph 174). The developer should be aware of the potential risks associated with the use of piling where contamination is an issue. Piling or other penetrative methods of foundation design on contaminated sites can potentially result in unacceptable risks to underlying groundwaters. The EA recommend that where soil contamination is present, a risk assessment is carried out in accordance with our guidance 'Piling into Contaminated Sites'. The EA will not permit piling activities on parts of a site where an unacceptable risk is posed to controlled waters.

- 13 Prior to commencement of construction, an acoustic assessment shall be submitted to the Local Planning Authority to assess the impact of commercial noise from surrounding commercial operations on future occupants of the development. The assessment shall be conducted in

accordance with BS4142:2014+A1-2019. The assessment shall include a review of currently proposed acoustic, ventilation, and overheating mitigation measures and a scheme of further or enhanced mitigation measures as may be necessary to ensure that future occupants do not suffer significant adverse impacts, and other adverse impacts are mitigated and minimised. Once approved the mitigation measures shall be implemented in full and permanently maintained thereafter.

Reason

To ensure that occupiers of proposed dwellings do not suffer a loss of amenity by reason of noise nuisance due to commercial noise in accordance with the National Planning Policy Framework 2021, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007).

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

- 14 Prior to the commencement of any above grade works (excluding demolition), details of bird and/or bat nesting boxes / bricks shall be submitted to and approved in writing by the Local Planning Authority. No less than 24 Swift bricks the top of the eastern elevation which shall be internal and set into the wall shall be provided and the details shall include the exact location, specification and design of the habitats.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with policies: G6 of the London Plan 2021, Policy 3.28 of the Southwark Plan and Strategic Policy 11 of the Southwark Core Strategy.

- 15 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 openingsto 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 2021, Policy D9 Tall Buildings of the London Plan 2021, 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).

- 16 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 2021, Policy D9 Tall Buildings of the London Plan 2021, 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)

- 17 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 2021, Strategic Policy 12 - Design and conservation of The Core Strategy 2011 and Saved Policy 3.14 Designing out crime of the Southwark Plan 2007.

- 18 Prior to the commencement of any above grade works (excluding demolition), details and 1:50 scale drawings of the secure cycle parking facilities in line with London Cycle Design Standards 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 2021, Policy T5 of the London Plan 2021, Strategic Policy 2 - Sustainable Transport of The Core Strategy 2011 and Saved Policy 5.3 Walking and Cycling of the Southwark Plan 2007.

- 19 Prior to the commencement of any above grade works (excluding demolition), details of the biodiversity green/brown roof shall be submitted to and approved in writing by the Local Planning Authority. The biodiversity green/brown roof 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 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 brown roof 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 G1 (Green Infrastructure) and G5 (Urban Greening) and of the London Plan 2021; Strategic Policy 11 (Design and Conservation) of the Core Strategy 2011, and; Saved Policy 3.28 (Biodiversity) of the Southwark Plan 2007.

- 20 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)(2)(a) 'wheelchair adaptable':- at least 10%

M4 (Category 2) 'accessible and adaptable dwellings':- remaining units

Reason:

In order to ensure the development complies with Core Strategy 2011 Strategic Policy 5 (Providing new homes) and London Plan 2021 Policy D7 (Accessible Housing).

- 21 Prior to the commencement of any above grade works (excluding demolition), full particulars of the sprinkler system to be used within the ground floor unit 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.

- 22 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 2021, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan 2007.

- 23 Prior to the installation of any lighting, a detailed lighting strategy and design for all internal and external lighting, demonstrating compliance with the Institute of Lighting Professionals (ILP) Guidance Notes, shall be submitted to and approved by the Local Planning Authority in writing. 23.00 hrs shall be the curfew for light pollution / light spillage assessment and implementation of the approved lighting strategy. If mitigation is required to avoid harmful light pollution or light spillage it shall be implemented prior to the first use of the building and retained as such thereafter.

Reason:

In order that the council may be satisfied as to the details of the development in the interest of the visual amenity of the area, the amenity and privacy of adjoining occupiers, and their protection from light nuisance, in accordance with The National Planning Policy Framework 2021, Strategic Policy 12 Design and Conservation and Strategic Policy 13 High environmental standards of The Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity and 3.14 Designing out crime of the Southwark Plan 2007.

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

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

Reason:

So that the council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2021; Strategic Policies 11 (Open Spaces and Wildlife), 12 (Design and conservation) and 13 (High Environmental Standards) of The Core Strategy 2011, and; Saved Policies 3.2 (Protection of

Amenity), 3.12 (Quality in Design) 3.13 (Urban Design) and 3.28 (Biodiversity) of the Southwark Plan 2007.

- 25 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 notwithstanding all permitted development rights shall remain in light industrial use.

The facilities approved shall be installed unless otherwise agreed in writing, and practical completion of the 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 2021.

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.

- 26 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 2021, 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

- 27 Prior to commencement for each building details shall be submitted to and approved in writing by the local planning authority demonstrating that a minimum of at least one lift per core (or more subject to capacity assessments) will be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building. The development shall be carried out in accordance with these details and maintained as such in perpetuity.

Reason: In order to ensure that the proposed development complies with the requirements of the London Fire Brigade and Policy D12 Fire Safety of the London Plan 2021

- 28 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 defensible space), 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.

- 29 Party floors/ceiling between the commercial premises and residential dwellings shall be designed to achieve a minimum weighted standardized level difference of 57dB 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 2021.

- 30 Before the marketing of the development to residential occupiers, details to ensure the promotion of car free living is clear to the occupiers of the development hereby permitted.

Reason:

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

- 31 No dwelling shall be occupied until a drainage verification report prepared by a suitably qualified engineer has been submitted to and approved in writing by the Local Planning Authority. The report shall provide evidence that the drainage system (incorporating SuDS) has been constructed according to the approved details and specifications (or detail any minor variations where relevant) as detailed in the *Flood Risk Assessment* (report reference: P450200-REP-C-002-FRA, dated 31/08/2021, rev. B), *Drainage Strategy* (report reference: P450200-REP-C-001, rev. 03, dated 27September 2021) and *SuDS - Response to Planning Comment* (dated 12/01/2022, dated rev. P1) prepared by Whitby Wood, and shall include plans, photographs and national grid references of key components of the drainage network such as surface water attenuation structures, flow control devices and outfalls. The report shall also include details of the responsible management company.

Reason: To ensure the surface water drainage complies with Southwark's Strategic Flood Risk Assessment and Policy SI 13 of the London Plan (2021).

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.

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

Bedrooms - 35dB LAeq T†, 30 dB L Aeq T*, 45dB LAFmax T *

Living and Dining rooms- 35dB LAeq T †

* - Night-time - 8 hours between 23:00-07:00

† - Daytime - 16 hours between 07:00-23:00

Following completion of the development and prior to occupation, a validation test shall be carried out on 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 2021.

- 33 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.

Suitable acoustic treatments shall be used to ensure compliance with the above standard. 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).

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

Reason:

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

- 35 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 2021, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity of The Southwark Plan 2007.

- 36 The commercial unit 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 2021.

- 37 Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order and any associated provisions of the Town and Country Planning General Permitted Development Order (including any future amendment or enactment of those Orders), the Class E use hereby permitted shall only be for light industrial uses as detailed in the Ground Floor Plan (PLOR-HBA-01-00-DR-A-080100 REV P2

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 2021.

- 38 The development hereby permitted shall be carried out in accordance with the Fire Safety Strategy by Jensen Hughes dated 6th September 2021.

Reason:

In order to ensure that the fire safety of the proposed development has been duly considered, as required by policy D12 'Fire safety' of the London Plan (2021).

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

Reason:

In order to ensure that no telecommunications plant or equipment which might be detrimental to the design and appearance of the building and visual amenity of the area is installed on the roof of the building in accordance with Chapter 12 (Achieving well-designed places) of the National Planning Policy Framework (2021); Policy D4 (Delivering good design) of the London Plan (2021); 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).

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

Reason:

In order to ensure that no additional plant is placed on the roof of the building in the interest of the appearance and design of the building and the visual amenity of the area in accordance with Chapter 12 (Achieving well-designed places) of the National Planning Policy Framework (2021); Policy D4 (Delivering good design) of the London Plan (2021); 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).

- 41 No meter boxes, flues, vents or pipes [other than rainwater pipes] or other appurtenances not shown on the approved drawings shall be fixed or installed on the street elevation of the building.

Reason:

To ensure such works do not detract from the appearance of the building (s) in accordance with Chapter 12 (Achieving well-designed places) the National Planning Policy Framework (2021); Policy D4 (Delivering good design) of the London Plan (2021); Strategic Policy 12 (Design and Conservation) of the Core Strategy (2011); and Saved Policies 3.12 (Quality in Design) and 3.13 (Urban Design) of the Southwark Plan (2007).

Special condition(s) - the following condition(s) are required post completion of relevant condition imposed in other sections of this decision notice

- 42 Within one year of the completion of the archaeological work on site, an assessment report detailing the proposals for the off-site analyses and post-excavation works, including publication

of the site and preparation for deposition of the archive, shall be submitted to and approved in writing by the Local Planning Authority, and the works detailed in the assessment report shall not be carried out otherwise than in accordance with any such approval given. The assessment report shall provide evidence of the applicant's commitment to finance and resource these works to their completion.

Reason: In order that the archaeological interest of the site is 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 2021.

- 43 No later than three months following substantial completion of the final residential unit within the development hereby consented, a Post Completion Circular Economy Report setting out the predicted and actual performance against all numerical targets in the relevant Planning Stage Circular Economy Statement shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that Planning Stage Circular Economy Statement has been implemented in the construction and delivery of the development, and that all on-going operational measures and mechanisms have been satisfactorily implemented, in order to achieve Circular Economy goals and in accordance with: the National Planning Policy Framework 2021, and; Policies GG6 (Increasing Efficiency and Resilience) and SI7 (Reducing Waste and Supporting the Circular Economy) of the London Plan 2021.

- 44 Within 12 months of first occupation of the development, an updated Whole Life-Cycle (WLC) Carbon Assessment demonstrating compliance with Part F of Policy SI 2 - Minimising greenhouse gas emissions of the London Plan 2021, shall be submitted and approved in writing by the Local Planning Authority. This assessment should calculate updated whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment based on actual emissions. The updated assessment should evidence what actions have been taken in implementing the development to reduce whole life-cycle carbon emissions, including assessment and evidencing of recommendations set out in the approved Sustainability Statement (authored by XCO2, dated September 2021).

Reason

To maximise the reduction in greenhouse gas emissions and to minimise peak and annual energy demand in compliance with Policy SI2 of the London Plan 2021.

Informative notes to the applicant relating to the proposed development

THAMES WATER

1. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverting-our-pipes>

2. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-ordiverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

APPENDIX 2**Consultation undertaken**

Site notice date: 22/09/2021

Press notice date: 23/09/2021

Case officer site visit date: n/a

Neighbour consultation letters sent: 15/09/2021

Internal services consulted

Transport Policy

Archaeology

Local Economy

Ecology

Highways Development and Management

Highways Licensing

Flood Risk Management & Urban Drainage

Urban Forester

Public Health

Waste Management

Environmental Protection

Community Infrastructure Levy Team

Statutory and non-statutory organisations

Arqiva

Environment Agency

Greater London Authority

Health and Safety Executive

Historic England

London Fire & Emergency Planning Authority

Natural England - London & South East

Metropolitan Police Service (Designing Out Crime)

Transport for London

Thames Water

Vital OKR

APPENDIX 3**Consultation responses received****Internal services**

Transport Policy

Archaeology

Design and Conservation Team [Formal]

Local Economy

Ecology

Highways Development and Management

Flood Risk Management & Urban Drainage

Urban Forester

Waste Management

Environmental Protection

Community Infrastructure Levy Team

Statutory and non-statutory organisations

Environment Agency

Greater London Authority

Health and Safety Executive

Heritage England

Metropolitan Police Service (Designing OUT Crime)

Thames Water

Transport for London

Neighbour and local groups consulted:

	430A Old Kent Road, London, Southwark
The Occupier	
The Occupier	43 Milestone House, 434 Old Kent Road, London
The Occupier	21 Glengall Road, London, Southwark
The Occupier	Flat 21, George Elliston House, Old Kent Road
The Occupier	Flat 12, Lanark House Mawbey Estate, Old Kent Road
The Occupier	Flat 7, Tevatree House, Old Kent Road
The Occupier	26 Glengall Road, London, Southwark
The Occupier	Flat 4, 41 Glengall Road, London
The Occupier	45 Milestone House, 434 Old Kent Road, London
The Occupier	13 Milestone House, 434 Old Kent Road, London
The Occupier	8 Milestone House, 434 Old Kent Road, London
The Occupier	Flat 4, 77 Trafalgar Avenue, London
The Occupier	25 Glengall Road, London, Southwark
The Occupier	Flat 38, George Elliston House, Old Kent Road
The Occupier	Flat 34, George Elliston House, Old Kent Road
The Occupier	Flat 5, Lanark House Mawbey Estate, Old Kent Road
The Occupier	Flat 18, Lanark House Mawbey Estate, Old Kent Road
The Occupier	Flat 2, Oleander House, 430 Old Kent Road
The Occupier	Flat 8, 41 Glengall Road, London
The Occupier	36 Milestone House, 434 Old Kent Road, London
The Occupier	25 Milestone House, 434 Old Kent Road, London
The Occupier	15 Milestone House, 434 Old Kent Road, London
The Occupier	12 Milestone House, 434 Old Kent Road, London
The Occupier	Flat 48, Oleander House, 1B Glengall Road
The Occupier	Flat 43, Oleander House, 1B Glengall Road
The Occupier	Flat 7, 77 Trafalgar Avenue, London
The Occupier	Flat 3, 77 Trafalgar Avenue, London
The Occupier	Flat 62, Oleander House, 1A Glengall Road
The Occupier	Flat 25, Portway House, 2A Ossory Road
The Occupier	Flat 18, Portway House, 2A Ossory Road
The Occupier	Flat 10, Portway House, 2A Ossory Road
The Occupier	Flat 8, Portway House, 2A Ossory Road
The Occupier	Flat 7, Portway House, 2A Ossory Road
The Occupier	Flat 17, Oleander House, 1B Glengall Road
The Occupier	Ground Floor Flat, 50 Glengall Road, London
The Occupier	Flat 33, Oleander House, 1B Glengall Road
The Occupier	37 Milestone House, 434 Old Kent Road, London
The Occupier	Flat 28, Lanark House Mawbey Estate, Old Kent Road
The Occupier	Flat 1, Oleander House, 430 Old Kent Road
The Occupier	12 Ossory Road, London, Southwark
The Occupier	Flat 45, George Elliston House, Old Kent Road
The Occupier	Flat 41, George Elliston House, Old Kent Road
The Occupier	Flat 35, George Elliston House, Old Kent Road
The Occupier	Flat 19, Lanark House Mawbey Estate, Old Kent Road

The Occupier	Flat 17, Lanark House Mawbey Estate, Old Kent Road
The Occupier	Flat 1, Lanark House Mawbey Estate, Old Kent Road
The Occupier	3 Glengall Terrace, London, Southwark
The Occupier	29 Glengall Road, London, Southwark
The Occupier	Flat 50, Oleander House, 1B Glengall Road
The Occupier	42 Milestone House, 434 Old Kent Road, London
The Occupier	Flat Top Floor 3, 462 Old Kent Road, London
The Occupier	32 Milestone House, 434 Old Kent Road, London
The Occupier	3 Milestone House, 434 Old Kent Road, London
The Occupier	Flat B, 44 Glengall Road, London
The Occupier	Flat 6, Oleander House, 430 Old Kent Road
The Occupier	Flat 4, Oleander House, 430 Old Kent Road
The Occupier	Flat 12, 77 Trafalgar Avenue, London
The Occupier	Flat 14, Oleander House, 1B Glengall Road
The Occupier	Flat 11, Oleander House, 430 Old Kent Road
The Occupier	Ground Floor Flat, 40A Glengall Road, London
The Occupier	Flat 2, 41 Glengall Road, London
The Occupier	28 Glengall Road, London, Southwark
The Occupier	39 Glengall Road, London, Southwark
The Occupier	19 Glengall Road, London, Southwark
The Occupier	Flat 42, George Elliston House, Old Kent Road
The Occupier	Flat 39, George Elliston House, Old Kent Road
The Occupier	Flat 13, George Elliston House, Old Kent Road
The Occupier	Flat 8A, Lanark House Mawbey Estate, Old Kent Road
The Occupier	Flat 8, Lanark House Mawbey Estate, Old Kent Road
The Occupier	Flat 26, Lanark House Mawbey Estate, Old Kent Road
The Occupier	Flat 5, Tevatree House, Old Kent Road
The Occupier	Flat 3, Tevatree House, Old Kent Road
The Occupier	Flat 28, Oleander House, 1B Glengall Road
The Occupier	Flat 12, Oleander House, 430 Old Kent Road
The Occupier	46 Milestone House, 434 Old Kent Road, London
The Occupier	30 Milestone House, 434 Old Kent Road, London
The Occupier	28 Milestone House, 434 Old Kent Road, London
The Occupier	6 Milestone House, 434 Old Kent Road, London
The Occupier	2 Milestone House, 434 Old Kent Road, London
The Occupier	Flat 51, Oleander House, 1B Glengall Road
The Occupier	Flat 46, Oleander House, 1B Glengall Road
The Occupier	Flat 1, 77 Trafalgar Avenue, London
The Occupier	Flat 59, Oleander House, 1A Glengall Road
The Occupier	Flat 55, Oleander House, 1A Glengall Road
The Occupier	Flat 11, Portway House, 2A Ossory Road
The Occupier	Flat 9, Portway House, 2A Ossory Road
The Occupier	Flat 4, Portway House, 2A Ossory Road
The Occupier	11A Glengall Road, London, Southwark
The Occupier	Flat 11, 77 Trafalgar Avenue, London
The Occupier	Flat 6, 41 Glengall Road, London
The Occupier	Flat 3, Oleander House, 430 Old Kent Road
The Occupier	Flat 7, George Elliston House, Old Kent Road

The Occupier	Flat 6, George Elliston House, Old Kent Road
The Occupier	Flat 17, George Elliston House, Old Kent Road
The Occupier	Flat 1, George Elliston House, Old Kent Road
The Occupier	Flat 2, Tevatree House, Old Kent Road
The Occupier	35 Glengall Road, London, Southwark
The Occupier	First Floor Flat, 34 Glengall Road, London
The Occupier	Flat 45, Oleander House, 1B Glengall Road
The Occupier	Flat 39, Oleander House, 1B Glengall Road
The Occupier	Flat 37, Oleander House, 1B Glengall Road
The Occupier	19 Milestone House, 434 Old Kent Road, London
The Occupier	Milestone House, 434 Old Kent Road, London
The Occupier	Flat 27, Oleander House, 1B Glengall Road
The Occupier	3 Glengall Road, London, Southwark
The Occupier	17 Glengall Road, London, Southwark
The Occupier	Flat 43, George Elliston House, Old Kent Road
The Occupier	Flat 25, George Elliston House, Old Kent Road
The Occupier	Flat 24, George Elliston House, Old Kent Road
The Occupier	Flat 20, George Elliston House, Old Kent Road
The Occupier	Flat 16, George Elliston House, Old Kent Road
The Occupier	Flat 2, Lanark House Mawbey Estate, Old Kent Road
The Occupier	14-22 Ossory Road, London, Southwark
The Occupier	Flat 30, Oleander House, 1B Glengall Road
The Occupier	38 Milestone House, 434 Old Kent Road, London
The Occupier	35 Milestone House, 434 Old Kent Road, London
The Occupier	Flat 53, Oleander House, 1B Glengall Road
The Occupier	Basement Flat, 5 Glengall Road, London
The Occupier	Flat 57, Oleander House, 1A Glengall Road
The Occupier	Flat 56, Oleander House, 1A Glengall Road
The Occupier	Flat 4, Roman House, 2B Ossory Road
The Occupier	Flat 29, Portway House, 2A Ossory Road
The Occupier	Flat 28, Portway House, 2A Ossory Road
The Occupier	Flat 22, Portway House, 2A Ossory Road
The Occupier	Flat 19, Portway House, 2A Ossory Road
The Occupier	Flat 15, Portway House, 2A Ossory Road
The Occupier	2 Glengall Terrace, London, Southwark
The Occupier	37 Glengall Road, London, Southwark
The Occupier	1 Milestone House, 434 Old Kent Road, London
The Occupier	Flat 29, George Elliston House, Old Kent Road
The Occupier	Flat 14, George Elliston House, Old Kent Road
The Occupier	Flat 4, George Elliston House, Old Kent Road
The Occupier	Flat 26, George Elliston House, Old Kent Road
The Occupier	Flat 12, George Elliston House, Old Kent Road
The Occupier	Flat 52, Oleander House, 1B Glengall Road
The Occupier	Flat 42, Oleander House, 1B Glengall Road
The Occupier	24 Milestone House, 434 Old Kent Road, London
The Occupier	21 Milestone House, 434 Old Kent Road, London
The Occupier	Flat 21, Oleander House, 1B Glengall Road
The Occupier	48B Glengall Road, London, Southwark

The Occupier	9A Glengall Road, London, Southwark
The Occupier	40 Glengall Road, London, Southwark
The Occupier	Flat 5, George Elliston House, Old Kent Road
The Occupier	Flat 40, George Elliston House, Old Kent Road
The Occupier	Flat 3, George Elliston House, Old Kent Road
The Occupier	Flat 2, George Elliston House, Old Kent Road
The Occupier	Flat 22, Lanark House Mawbey Estate, Old Kent Road
The Occupier	Flat 11, Lanark House Mawbey Estate, Old Kent Road
The Occupier	Flat 22, Oleander House, 1B Glengall Road
The Occupier	Flat 5, Oleander House, 430 Old Kent Road
The Occupier	Flat 5, 41 Glengall Road, London
The Occupier	33 Milestone House, 434 Old Kent Road, London
The Occupier	20 Milestone House, 434 Old Kent Road, London
The Occupier	4 Milestone House, 434 Old Kent Road, London
The Occupier	Flat 54, Oleander House, 1B Glengall Road
The Occupier	Flat 64, Oleander House, 1A Glengall Road
The Occupier	Flat 58, Oleander House, 1A Glengall Road
The Occupier	Flat 27, Portway House, 2A Ossory Road
The Occupier	Flat 26, Portway House, 2A Ossory Road
The Occupier	Flat 20, Portway House, 2A Ossory Road
The Occupier	Flat 6, Portway House, 2A Ossory Road
The Occupier	Flat 13, Lanark House Mawbey Estate, Old Kent Road
The Occupier	5 Glengall Terrace, London, Southwark
The Occupier	49 Milestone House, 434 Old Kent Road, London
The Occupier	Flat 19, George Elliston House, Old Kent Road
The Occupier	22 Milestone House, 434 Old Kent Road, London
The Occupier	Flat 15, George Elliston House, Old Kent Road
The Occupier	Flat 6, Tevatree House, Old Kent Road
The Occupier	Flat 4, Lanark House Mawbey Estate, Old Kent Road
The Occupier	Flat 23, Lanark House Mawbey Estate, Old Kent Road
The Occupier	Flat 14, Lanark House Mawbey Estate, Old Kent Road
The Occupier	Flat 3, 41 Glengall Road, London
The Occupier	Flat 34, Oleander House, 1B Glengall Road
The Occupier	Shop, 462 Old Kent Road, London
The Occupier	34 Milestone House, 434 Old Kent Road, London
The Occupier	Flat 19, Oleander House, 1B Glengall Road
The Occupier	Ground Floor And First Floor Flat, 27 Glengall Road, London
The Occupier	Upper Ground Floor Flat, 34 Glengall Road, London
The Occupier	Unit B, 2-10 Ossory Road, London
The Occupier	33 Glengall Road, London, Southwark
The Occupier	13 Glengall Road, London, Southwark
The Occupier	46 Glengall Road, London, Southwark
The Occupier	1 Glengall Terrace, London, Southwark
The Occupier	Flat 31, George Elliston House, Old Kent Road
The Occupier	Flat 27, George Elliston House, Old Kent Road
The Occupier	Flat 22, George Elliston House, Old Kent Road
The Occupier	Flat 24, Lanark House Mawbey Estate, Old Kent Road
The Occupier	Flat 20, Lanark House Mawbey Estate, Old Kent Road

The Occupier	454-460 Old Kent Road, London, Southwark
The Occupier	Flat 23, Oleander House, 1B Glengall Road
The Occupier	Flat 7, Oleander House, 430 Old Kent Road
The Occupier	39 Milestone House, 434 Old Kent Road, London
The Occupier	26 Milestone House, 434 Old Kent Road, London
The Occupier	18 Milestone House, 434 Old Kent Road, London
The Occupier	10 Milestone House, 434 Old Kent Road, London
The Occupier	7 Milestone House, 434 Old Kent Road, London
The Occupier	Flat Ground Floor 1, 462 Old Kent Road, London
The Occupier	First Floor Flat, 40A Glengall Road, London
The Occupier	Flat 6, Roman House, 2B Ossory Road
The Occupier	Flat 3, Roman House, 2B Ossory Road
The Occupier	Flat 1, Roman House, 2B Ossory Road
The Occupier	Flat 30, Portway House, 2A Ossory Road
The Occupier	Flat 21, Portway House, 2A Ossory Road
The Occupier	Flat 17, Portway House, 2A Ossory Road
The Occupier	Flat 16, Portway House, 2A Ossory Road
The Occupier	Flat 1, Portway House, 2A Ossory Road
The Occupier	462 Old Kent Road, London, Southwark
The Occupier	Flat 41, Oleander House, 1B Glengall Road
The Occupier	Flat 33, George Elliston House, Old Kent Road
The Occupier	1 Glengall Road, London, Southwark
The Occupier	Flat 24, Oleander House, 1B Glengall Road
The Occupier	31 Milestone House, 434 Old Kent Road, London
The Occupier	Ground Floor And First Floor Flat, 9 Glengall Road, London
The Occupier	Flat 29, Oleander House, 1B Glengall Road
The Occupier	Flat 27, Lanark House Mawbey Estate, Old Kent Road
The Occupier	Flat 9, 77 Trafalgar Avenue, London
The Occupier	Flat 44, George Elliston House, Old Kent Road
The Occupier	Flat 37, George Elliston House, Old Kent Road
The Occupier	Flat 23, George Elliston House, Old Kent Road
The Occupier	Flat 9, Lanark House Mawbey Estate, Old Kent Road
The Occupier	23 Glengall Road, London, Southwark
The Occupier	42 Glengall Road, London, Southwark
The Occupier	32 Glengall Road, London, Southwark
The Occupier	48A Glengall Road, London, Southwark
The Occupier	452 Old Kent Road, London, Southwark
The Occupier	48 Milestone House, 434 Old Kent Road, London
The Occupier	Flat 6, 77 Trafalgar Avenue, London
The Occupier	36 Glengall Road, London, Southwark
The Occupier	4 Glengall Terrace, London, Southwark
The Occupier	Flat 11, George Elliston House, Old Kent Road
The Occupier	Flat 15, Lanark House Mawbey Estate, Old Kent Road
The Occupier	Flat 10, Lanark House Mawbey Estate, Old Kent Road
The Occupier	Flat 40, Oleander House, 1B Glengall Road
The Occupier	Flat 31, Oleander House, 1B Glengall Road
The Occupier	Flat 25, Oleander House, 1B Glengall Road
The Occupier	47 Milestone House, 434 Old Kent Road, London

The Occupier	44 Milestone House, 434 Old Kent Road, London
The Occupier	Second Floor Flat, 50 Glengall Road, London
The Occupier	Flat C, 44 Glengall Road, London
The Occupier	Flat 8, 77 Trafalgar Avenue, London
The Occupier	Flat 2, Roman House, 2B Ossory Road
The Occupier	Flat 24, Portway House, 2A Ossory Road
The Occupier	Flat 3, Portway House, 2A Ossory Road
The Occupier	14 Milestone House, 434 Old Kent Road, London
The Occupier	40 Milestone House, 434 Old Kent Road, London
The Occupier	Flat 4, Tevatree House, Old Kent Road
The Occupier	Flat Middle Floor 2, 462 Old Kent Road, London
The Occupier	Flat 28, George Elliston House, Old Kent Road
The Occupier	Flat 32, George Elliston House, Old Kent Road
The Occupier	Flat 9, George Elliston House, Old Kent Road
The Occupier	Flat 30, George Elliston House, Old Kent Road
The Occupier	Flat 21, Lanark House Mawbey Estate, Old Kent Road
The Occupier	15 Glengall Road, London, Southwark
The Occupier	Flat 47, Oleander House, 1B Glengall Road
The Occupier	Flat 7, 41 Glengall Road, London
The Occupier	Flat 16, Oleander House, 1B Glengall Road
The Occupier	Flat 9, Oleander House, 430 Old Kent Road
The Occupier	Basement Flat, 27 Glengall Road, London
The Occupier	35A Glengall Road, London, Southwark
The Occupier	38 Glengall Road, London, Southwark
The Occupier	24 Glengall Road, London, Southwark
The Occupier	Flat 8, George Elliston House, Old Kent Road
The Occupier	Flat 36, George Elliston House, Old Kent Road
The Occupier	Flat 18, George Elliston House, Old Kent Road
The Occupier	Flat 10, George Elliston House, Old Kent Road
The Occupier	Flat 3, Lanark House Mawbey Estate, Old Kent Road
The Occupier	Flat 16, Lanark House Mawbey Estate, Old Kent Road
The Occupier	Flat 1, Tevatree House, Old Kent Road
The Occupier	Flat 38, Oleander House, 1B Glengall Road
The Occupier	Flat 35, Oleander House, 1B Glengall Road
The Occupier	Flat 20, Oleander House, 1B Glengall Road
The Occupier	Flat 15, Oleander House, 1B Glengall Road
The Occupier	Flat 13, Oleander House, 1B Glengall Road
The Occupier	Flat 10, Oleander House, 430 Old Kent Road
The Occupier	Flat 8, Oleander House, 430 Old Kent Road
The Occupier	23 Milestone House, 434 Old Kent Road, London
The Occupier	17 Milestone House, 434 Old Kent Road, London
The Occupier	Flat 5, 77 Trafalgar Avenue, London
The Occupier	Flat 14, Portway House, 2A Ossory Road
The Occupier	Flat 12, Portway House, 2A Ossory Road
The Occupier	Flat 5, Portway House, 2A Ossory Road
The Occupier	Flat 2, Portway House, 2A Ossory Road
The Occupier	Flat 6, Lanark House Mawbey Estate, Old Kent Road
The Occupier	Flat 36, Oleander House, 1B Glengall Road

The Occupier	16 Milestone House, 434 Old Kent Road, London
The Occupier	First Floor And Second Floor Flat, 5 Glengall Road, London
The Occupier	30 Glengall Road, London, Southwark
The Occupier	11 Milestone House, 434 Old Kent Road, London
The Occupier	Flat 7, Lanark House Mawbey Estate, Old Kent Road
The Occupier	Flat 25, Lanark House Mawbey Estate, Old Kent Road
The Occupier	Flat 19A, Lanark House Mawbey Estate, Old Kent Road
The Occupier	Flat A, 44 Glengall Road, London
The Occupier	29 Milestone House, 434 Old Kent Road, London
The Occupier	27 Milestone House, 434 Old Kent Road, London
The Occupier	5 Milestone House, 434 Old Kent Road, London
The Occupier	Flat 32, Oleander House, 1B Glengall Road
The Occupier	First Floor Flat, 50 Glengall Road, London
The Occupier	Basement Flat, 34 Glengall Road, London
The Occupier	Flat 1, 41 Glengall Road, London
The Occupier	11B Glengall Road, London, Southwark
The Occupier	7 Glengall Road, London, Southwark
The Occupier	31 Glengall Road, London, Southwark
The Occupier	15A Glengall Road, London, Southwark
The Occupier	Flat 26, Oleander House, 1B Glengall Road
The Occupier	Flat 18, Oleander House, 1B Glengall Road
The Occupier	432 Old Kent Road, London, Southwark
The Occupier	41 Milestone House, 434 Old Kent Road, London
The Occupier	9 Milestone House, 434 Old Kent Road, London
The Occupier	Flat 49, Oleander House, 1B Glengall Road
The Occupier	Flat 44, Oleander House, 1B Glengall Road
The Occupier	Flat 2, 77 Trafalgar Avenue, London
The Occupier	Flat 10, 77 Trafalgar Avenue, London
The Occupier	Flat 63, Oleander House, 1A Glengall Road
The Occupier	Flat 61, Oleander House, 1A Glengall Road
The Occupier	Flat 60, Oleander House, 1A Glengall Road
The Occupier	Flat 5, Roman House, 2B Ossory Road
The Occupier	Flat 23, Portway House, 2A Ossory Road
The Occupier	Flat 13, Portway House, 2A Ossory Road
The Occupier	30 Monmouth Court, Coopers Road, London
The Occupier	17 Relf Road, London, SE15 4JS
The Occupier	15 Pelier Street, London, SE17 3JG
The Occupier	Apartment 32, 2 Woods Road, London
The Occupier	14C Wilson Road, Camberwell, London
The Occupier	23 Glengall Road, London, Se156nj
The Occupier	21 Glengall Road, London, SE15 6NJ
The Occupier	Flat 57 Ambleside Point Tustin Estate London SE15 1EB, ,
The Occupier	29 Glengall Road, London, SE15 6NJ
The Occupier	86 Penton Place, Flat A, Walworth, London
The Occupier	33 Glengall Road, LONDON, SE15 6NJ
The Occupier	King's College London , 57 Waterloo Road,, London SE1 8WA
The Occupier	8 Arundel Buildings, Webb Street, SE1 4AS, ,
The Occupier	Flat 24 Portway House, 2a Ossory Road, London

The Occupier	42 Glengall Road, London, SE15 6NH
The Occupier	23 glengall Road, london, SE156NJ
The Occupier	7 Wilmot Close, Peckham, London

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OPEN**MUNICIPAL YEAR 2021-22****COMMITTEE:****PLANNING COMMITTEE****NOTE:**

Original held in Constitutional Team; all amendments/queries to Gerald Gohler/ Gregory Weaver, Constitutional Team, Email: Gerald.gohler@southwark.gov.uk or Gregory.weaver@southwark.gov.uk

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Councillor Damian O'Brien	1		
Councillor Cleo Soanes	1		
Councillor Dan Whitehead	1		
Councillor James Coldwell	1		
Councillor Bill Williams	1		
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		Sarah Newman	1
Councillor Radha Burgess (reserve)		COMMUNICATIONS TEAM	
Councillor Victor Chamberlain (reserve)			
Councillor Jon Hartley (reserve)		Louise Neilan	
Councillor Nick Johnson (reserve)			
Councillor Eleanor Kerslake (reserve)		LEGAL TEAM	
Councillor James McAsh (reserve)			
Councillor Victoria Mills (reserve)		Jonathan Gorst	1
Councillor Margy Newens (reserve)			
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		TOTAL PRINT RUN	18
		List Updated: 25 January 2022	