

## Planning Committee

Wednesday 14 September 2022

6.30 pm

Ground Floor Meeting Room G02A - 160 Tooley Street, London SE1 2QH

### Membership

Councillor Richard Livingstone (Chair)  
Councillor Kath Whittam (Vice-Chair)  
Councillor Ellie Cumbo  
Councillor Nick Johnson  
Councillor Richard Leeming  
Councillor Reginald Popoola  
Councillor Bethan Roberts  
Councillor Cleo Soanes

### Reserves

Councillor Sam Foster  
Councillor Jon Hartley  
Councillor Sarah King  
Councillor Sunny Lambe  
Councillor Margy Newens  
Councillor Sandra Rhule  
Councillor Michael Situ  
Councillor Emily Tester

---

### INFORMATION FOR MEMBERS OF THE PUBLIC

---

#### Access to information

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

#### Babysitting/Carers allowances

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

#### Access

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

#### Contact

Gregory Weaver on 02075253667 or email: [greg.weaver@southwark.gov.uk](mailto:greg.weaver@southwark.gov.uk)

---

Members of the committee are summoned to attend this meeting

**Althea Loderick**

Chief Executive

Date: 6 September 2022



# Planning Committee

Wednesday 14 September 2022

6.30 pm

Ground Floor Meeting Room G02A - 160 Tooley Street, London SE1 2QH

## Order of Business

Item No.	Title	Page No.
	<b>PART A - OPEN BUSINESS</b>	
	<b>PROCEDURE NOTE</b>	
<b>1.</b>	<b>APOLOGIES</b>	
	To receive any apologies for absence.	
<b>2.</b>	<b>CONFIRMATION OF VOTING MEMBERS</b>	
	A representative of each political group will confirm the voting members of the committee.	
<b>3.</b>	<b>NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT</b>	
	In special circumstances, an item of business may be added to an agenda within five clear days of the meeting.	
<b>4.</b>	<b>DISCLOSURE OF INTERESTS AND DISPENSATIONS</b>	
	Members to declare any personal interests and dispensation in respect of any item of business to be considered at this meeting.	
<b>5.</b>	<b>MINUTES</b>	3 - 15
	To approve as correct records the minutes of the meetings held on 19 July 2022 and 26 July 2022.	

<b>Item No.</b>	<b>Title</b>	<b>Page No.</b>
6.	<b>TO RELEASE £700,703.45 OF SECTION 106 FUNDING FROM THE GREEN BUILDINGS FUND TO FUND MANOR GROVE COUNCIL HOMES REFURBISHMENT PROGRAMME</b>	16 - 97
7.	<b>DEVELOPMENT MANAGEMENT</b>	98 - 101
7.1.	<b>COLECHURCH HOUSE, LONDON BRIDGE WALK, LONDON</b>	102 - 249
7.2.	<b>35-39 PARKHOUSE STREET, LONDON SE5 7TQ</b>	250 - 355

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

#### **EXCLUSION OF PRESS AND PUBLIC**

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

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

#### **PART B - CLOSED BUSINESS**

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

**BLANK PAGE**

Date: 6 September 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.

**Please note:**

Those wishing to speak at the meeting should notify the constitutional team by email at [ConsTeam@southwark.gov.uk](mailto:ConsTeam@southwark.gov.uk) in advance of the meeting by **5pm** on the working day preceding the meeting.

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

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

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



+

## Planning Committee

MINUTES of the Planning Committee held on Tuesday 19 July 2022 at 6.30 pm at Ground Floor Meeting Room G02 - 160 Tooley Street, London SE1 2QH

---

**PRESENT:** Councillor Kath Whittam (Vice-Chair in the chair)  
 Councillor Ellie Cumbo  
 Councillor Nick Johnson  
 Councillor Richard Leeming  
 Councillor Bethan Roberts  
 Councillor Sam Foster (reserve)

**OTHER MEMBERS PRESENT:** Councillor Richard Livingstone (speaking as a ward councillor)

**OFFICER SUPPORT:** Colin Wilson (Head of Strategic Development)  
 Sadia Hussain (Deputy Head of Law, Property and Development)  
 Troy Davies (Team Leader Old Kent Road)  
 Gerald Gohler (Constitutional Officer)

### 1. APOLOGIES

There were apologies for absence from Councillors Reginald Popoola and Cleo Soanes, and for lateness from Councillor Sam Foster.

### 2. CONFIRMATION OF VOTING MEMBERS

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

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

The chair drew members' attention to the members' pack and the addendum report.

#### 4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

There were none.

#### 5. DEVELOPMENT MANAGEMENT

##### RESOLVED:

1. That the determination of planning applications, or formal observations and comments, the instigation of enforcement action and the receipt of the reports included in the attached items were 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 be agreed.
3. That where reasons for decisions or conditions were not included or not as included in the reports relating to an individual item, they be clearly specified and agreed.

At this point, the meeting took a short recess of two minutes to allow Councillor Sam Foster to join.

Having joined the meeting, Councillor Sam Foster confirmed that he was a voting member of the committee and that he had no interests or dispensations to declare.

#### 5.1 TUSTIN ESTATE LAND BOUNDED BY MANOR GROVE ILBERTON ROAD HILLBECK CLOSE OLD KENT ROAD SE15

**Planning Application Number:** 22/AP/1221

Pages 6 to 246 of the main agenda pack and pages 1 to 4 of the addendum report.

##### PROPOSAL:

*Hybrid application comprising a full planning application for Phase 1 comprising the demolition of Hillbeck Close, Ullswater House and garages at Manor Grove and the erection of four buildings at 2/3- storeys (D1 and D2), 5/9-storeys (C) and 7/13-storeys (G1) providing 167 homes (Class C3) with associated parking, public realm, open spaces, landscaping and ancillary infrastructure; and the refurbishment of properties at Manor Grove. Outline planning permission (all matters reserved except for access) for phases 2, 3 and 4 comprising the demolition of Bowness House, Pilgrims Way Primary School, Kentmere House and*

*Heversham House and the erection of 12 buildings (A, B, E1, E2, E3, E4, F1, F2, G2, H, J and Pilgrims Way Primary School) ranging in height from 2 to 21 storeys to provide up to 57,786 sqm of floorspace (GEA), comprising up to 523 affordable and market homes (Class C3), up to 3,452 sqm (GEA) of flexible commercial floorspace (Class E, F1 and sui generis) and up to 2,214 sqm (GEA) of educational floorspace (Class F1) including temporary space for the children's centre, with associated parking, public realm, open spaces (including MUGA), landscaping and ancillary infrastructure. Providing a total of 690 homes (Use Class C3) and 5,666 sqm (GEA) of non-residential floorspace (Use Classes E, F1 and sui generis).*

The committee heard the officer's introduction to the report and addendum report.

Members of the committee asked questions of the officers present.

There were no objectors present and wishing to speak.

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

A representative of the supporters living within 100 metres of the development site addressed the meeting. Members of the committee asked questions of the supporters' representative.

Councillor Richard Livingstone addressed the committee in his capacity as a ward councillor and answered questions put by members of the committee. Having responded to all the questions put by members of the committee, Councillor Livingstone left the meeting room.

The committee discussed the application and asked further questions of planning officers.

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

**RESOLVED:**

1. That planning permission be granted subject to conditions, referral to the Mayor of London and the completion of a unilateral undertaking.
2. That the environmental information be taken into account as required by Regulation 30 of the Town and Country Planning (Environmental Impact Assessments) Regulations 2017.
3. That following issue of the decision it be confirmed that the Director of Planning shall place a statement on the Statutory Register pursuant to Regulation 30 of the Town and Country Planning (Environmental Impact Assessments) Regulations and that for the purposes of Regulation 30(1) (d) the main reasons and considerations on which the Local Planning



Authority's decision is based shall be set out as in the report.

4. In the event that the requirements of (1.) are not met by 1 December 2022 that the Director of Planning and Growth be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 418 of the report.

The meeting ended at 8.00 pm.

**CHAIR:**

**DATED:**



## Planning Committee

MINUTES of the Planning Committee held on Tuesday 26 July 2022 at 6.30 pm at Ground Floor Meeting Room G02 - 160 Tooley Street, London SE1 2QH

---

**PRESENT:** Councillor Richard Livingstone (Chair)  
Councillor Kath Whittam (Vice-Chair)  
Councillor Nick Johnson  
Councillor Richard Leeming  
Councillor Reginald Popoola  
Councillor Bethan Roberts

**OTHER MEMBERS PRESENT:** Councillor Jason Ochere (ward councillor)  
Councillor Ian Wingfield (ward councillor)

**OFFICER SUPPORT:** Colin Wilson, Head of Strategic Development  
Sadia Hussain, Acting Deputy Head of Law (Property and Development)  
Dipesh Patel, Group Manager - Major Applications and New Homes Team  
Michael Tsoukaris, Group Manager Design & Conservation  
Victoria Lewis, Team Leader, Development Management  
Alex Oyebade, Team Leader Transport Policy  
Gemma Usher, Team Leader, Development Management  
Patrick Cronin, Planning Officer  
Sean Good, NRP Ltd (external)  
Jacob Kut, Avison Young (external)  
Maria Lugangira, Principal Constitutional Officer  
Gerald Gohler, Constitutional Officer

### 1. APOLOGIES

There were apologies for absence from Councillors Ellie Cumbo and Cleo Soanes.

## 2. CONFIRMATION OF VOTING MEMBERS

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

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

The chair drew members' attention to the members' pack and the addendum report.

The chair also informed the meeting that the development management items would be heard in the following order:

- Item 8.3 Burgess Business Park, Parkhouse Street London SE5 7TJ
- Item 8.1 Zone L, Canada Water Masterplan Surrey Quays Road London Southwark SE16 7LL
- Item 8.2 Zone F, Canada Water Masterplan Surrey Quays Road London Southwark SE16 7LL

## 4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

The following members of the committee declared interests in respect of:

### **Item 8.1 Zone L, Canada Water Masterplan Surrey Quays Road London Southwark SE16 7LL**

Councillor Nick Johnson, non-pecuniary, as this item was partly in his ward, but he would approach the application with an open mind.

Councillor Bethan Roberts, non-pecuniary, as this item was partly in her ward, but she would approach the application with an open mind.

Councillor Kath Whittam, non-pecuniary, as this item was partly in her ward, but she would approach the application with an open mind.

### **Item 8.2 Zone F, Canada Water Masterplan, Surrey Quays Road London Southwark, SE16 7LL**

Councillor Nick Johnson, non-pecuniary, as this item was partly in his ward, but he would approach the application with an open mind.

Councillor Bethan Roberts, non-pecuniary, as this item was partly in her ward, but

she would approach the application with an open mind.

Councillor Kath Whittam, non-pecuniary, as this item was partly in her ward, but she would approach the application with an open mind.

## 5. MINUTES

The chair informed the committee that the minutes of the meeting held on 11 July 2022 needed to be amended to reflect that Councillor Margy Newens had attended as a reserve member.

### **RESOLVED:**

That the minutes of the meeting which took place on 11 July 2022, including the above amendment, be agreed.

## 6. ARTICLE 4 DIRECTION TO WITHDRAW THE PERMITTED DEVELOPMENT RIGHTS FOR THE DEMOLITION OF NO. 41 LINDEN GROVE, SE15 3LW

Report: see pages 6 to 32 of the main agenda pack.

The chair informed the meeting that while the committee did not normally hear representations from members of the public when making decisions on Article 4 reports, he had received a request from the owners of the property in question asking to address the meeting, and had decided to allow them to address the committee for three minutes.

The meeting heard the officer's introduction to the report. There were no questions from members of the committee.

The owner of the property addressed the committee and answered questions posed by the committee.

Members of the committee put further questions to officers.

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

### **RESOLVED:**

1. That an immediate Article 4(1) direction (Appendix A of the report) to withdraw the permitted development right granted by the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), which would otherwise permit the demolition of no.41 Linden Grove (site identified in Appendix B of the report) that has been identified as a heritage asset, be approved.

2. That consultations be undertaken for a period of six weeks in relation to the immediate Article 4(1) direction.
3. That the equalities analysis of the proposed Article 4(1) direction (Appendix C of the report) be noted.

**7. TO RELEASE £487,532.15 OF SECTION 106 FUNDING FROM THE GREEN BUILDINGS FUND FOR ITS ADMINISTRATION, PROJECT DELIVERY AND MANAGEMENT; AND CARBON OFFSETTING AND CLIMATE CHANGE WORK**

Report: see pages 33 to 42 of the main agenda pack and page 1 of the addendum report.

The committee heard the officer's introduction to the report and considered the information contained therein.

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

**RESOLVED:**

That the release of £487,532.15 of pooled Section 106 carbon offsetting financial contributions from the council's Green Buildings Fund towards the funding of three climate change officer roles (x 2 on Grade 12 and x 1 on Grade 11) on two-year fixed term contracts, be approved.

**8. DEVELOPMENT MANAGEMENT**

**RESOLVED:**

1. That the determination of planning applications, or formal observations and comments, the instigation of enforcement action and the receipt of the reports included in the attached items were 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 be agreed.
3. That where reasons for decisions or conditions were not included or not as included in the reports relating to an individual item, they be clearly specified and agreed.

**8.3 BURGESS BUSINESS PARK, PARKHOUSE STREET LONDON SE5 7TJ**

**Planning Application Number: 21/AP/1342**

Report: Pages 400 to 764 of the main agenda pack and pages 7 to 13 of the

addendum report.

**PROPOSAL:**

*Demolition of the existing buildings and redevelopment of the site to provide residential units (Class C3), flexible commercial floorspace (Class E) and community floorspace (Class F) within 12 blocks of between 2-13 storeys, with car and cycle parking and associated hard and soft landscaping and public realm improvements.*

The committee heard the officer's introduction to the report and addendum report.

Representatives of the objectors to the proposal addressed the committee and answered questions put by the committee.

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

There were no supporters living within 100 metres of the development site who wished to speak.

Councillors Jason Ochere and Ian Wingfield addressed the committee in their capacity as ward councillors, and answered questions put by members of the committee.

The committee discussed the application and asked further questions of the planning officers.

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

**RESOLVED:**

1. That planning permission be granted subject to:
  - a. The conditions set out in the report (as amended by the addendum report)
  - b. The applicant entering into an appropriate legal agreement
  - c. Referral to the Mayor of London.
2. That environmental information be taken into account as required by Regulation 26 of the Town and Country Planning (Environmental Impact Assessments) Regulations 2017 (as amended).
3. That following the issuing of the permission, the director of planning and growth places a statement on the Statutory Register pursuant to Regulation 30 of the Town and Country Planning (Environmental Impact Assessments) Regulations 2017 (as amended) and that for the purposes of Regulation

30(1)(d) the main reasons and considerations on which the planning committee's decision is based shall be set out as in this report, and shall inform the Secretary of State of the decision.

4. That in the event that the requirements of paragraph 1 above are not met by 30 September 2022, the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 499 of the report.
5. That the following be addressed via the Section 106 agreement:
  - i. The employment offset fund and employment on site should be prioritised for residents and businesses in the Camberwell area
  - ii. TfL contributions should only be used for additional services.

## **8.1 ZONE L, CANADA WATER MASTERPLAN SURREY QUAYS ROAD LONDON SOUTHWARK SE16 7LL**

### **Planning Application Number: 21/AP/3775**

Report: pages 48 to 234 of the main agenda pack and pages 1 to 5 of the addendum report.

### **PROPOSAL:**

*Details of all reserved matters (Access, Appearance, Landscaping, Layout and Scale) relating to Development Zone L of the Canada Water Masterplan, comprising the construction of three residential buildings with flexible retail/workspace/community uses (Classes A1-A4, B1 and D1) at ground floor level alongside car parking, cycle parking, landscaping, public realm, plant and associated works.*

*This application is pursuant to hybrid planning permission for the Canada Water Masterplan ref. 18/AP/1604 dated 29th May 2020, which was accompanied by an Environmental Statement. Consequently the application is accompanied by a Statement of Conformity submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) regulations 2017. This ES Statement of Conformity should be read in conjunction with the Canada Water Masterplan ES which can be viewed in full on the Council's website (18/AP/1604).*

The committee heard the officer's introduction to the report and addendum report.

The meeting briefly adjourned from 20:49 to 20:50 to allow Councillor Richard Leeming to answer an urgent telephone call.

Members of the committee asked questions of the officers present.

**ACTION:** Officers to provide information about greening across the masterplan area to members of the committee.

There were no objectors present and wishing to speak.

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

There were no supporters living within 100 metres of the development site or ward councillors wishing to address the meeting.

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

**RESOLVED:**

1. That all reserved matters (Access, Appearance, Landscaping, Layout and Scale) relating to Development Zone L of hybrid planning permission 18/AP/1604 be approved, subject to conditions (as amended by the addendum report).
2. That it should be noted that this Reserved Matters Application is bound by the Section 106 legal agreement and conditions attached to the Outline Planning Permission 18/AP/1604.
3. That environmental information must be taken into account as required by Regulation 26(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).

**8.2 ZONE F, CANADA WATER MASTERPLAN, SURREY QUAYS ROAD LONDON SOUTHWARK, SE16 7LL**

**Planning Application Number: 21/AP/4712**

Report: pages 235 to 399 of the main agenda pack and pages 5 to 7 of the addendum report.

**PROPOSAL:**

*Details of all reserved matters (Access, Appearance, Landscaping, Layout and Scale) relating to Development Zone F of the Canada Water Masterplan, comprising a residential-led (Class C3) building and a combined office (Class B1) and residential (Class C3) building, both of which would include flexible retail/workspace (Classes A1-A4 and B1) at ground floor level alongside disabled car parking, cycle parking, servicing provision, landscaping, public realm, plant, a single-storey basement and associated works.*



*This application is pursuant to hybrid planning permission for the Canada Water Masterplan ref. 18/AP/1604 dated 29th May 2020, which was accompanied by an Environmental Statement. Consequently the application is accompanied by a Statement of Conformity submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) regulations 2017. This ES Statement of Conformity should be read in conjunction with the Canada Water Masterplan ES which can be viewed in full on the Council's website (18/AP/1604).*

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

There were no objectors present and wishing to speak.

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

There were no supporters living within 100 metres of the development site or ward councillors wishing to address the meeting.

The committee discussed the application and asked further questions of planning officers.

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

**RESOLVED:**

1. That planning permission be granted subject to the additional conditions and informatives as set out in the draft recommendation at Appendix 1 of the report (and amended by the addendum report).
2. That it be noted that this Reserved Matters Application is bound by the s106 legal agreement and conditions attached to the Outline Planning Permission 18/AP/1604.
3. That environmental information be taken into account as required by Regulation 26(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended).

The meeting ended at 22:24.

**CHAIR:**

**DATED:**



<b>Item No.</b> 6.	<b>Classification:</b> Open	<b>Date:</b> 14 September 2022	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>		To release £700,703.45 of Section 106 funding from the Green Buildings Fund to fund Manor Grove Council Homes Refurbishment Programme	
<b>Ward(s) or groups affected:</b>		Old Kent Road	
<b>From:</b>		Director of Planning and Growth	

## RECOMMENDATION

1. That planning committee approves the release of £700,703.45 from the council's Green Buildings Fund to fund energy efficiency improvement works as part of the refurbishment of up to 18 council homes on Manor Grove within the Tustin Estate as set out below. A more detailed breakdown of funds that will be drawn down is included elsewhere in this report.

## BACKGROUND INFORMATION

2. This will be taken from Section 106 Legal Agreements associated with the following planning permissions:

Permission Ref	Address	Amount
16/AP/5235	VARCOE SERVICE STATION 1 VARCOE ROAD, LONDON, SE16 3DG	£68,562.96
17/AP/4546	180 ILBERTON ROAD, LONDON, SE15 1NT	£21,434.56
18/AP/3167	151-157 TOWER BRIDGE ROAD, LONDON SE1 3JE	£9,721.80
18/AP/0710	GARAGES, WELSFORD STREET, LONDON SE1 5RA	£31,031.74
18/AP/2895	2 VARCOE ROAD, LONDON, SE16 3DG	£111,168.00
17/AP/3170	18-19 CRIMSCOTT STREET, LONDON, SE1 5TE	£88,206.47
17/AP/3757	62 HATCHAM ROAD AND 134-140 ILBERTON ROAD, LONDON SE15 1TW	£105,421.57

Permission Ref	Address	Amount
18/AP/0091	DOCKLEY ROAD INDUSTRIAL ESTATE, 2 DOCKLEY ROAD, LONDON, LONDON SE16 3SF	£146,811.87
20/AP/1390	Southwark Park Day Centre 345 Southwark Park Road London Southwark SE16 2JN	£59,982.89
17/AP/1688	179 Ilderton Road, London, SE16 3LA.	£5,870.09
18/AP/4195	ANTONY HOUSE AND RODERICK HOUSE, RAYMOUTH ROAD, LONDON SE16 2DJ	£52,491.50
		<b>£700,703.45</b>

- Although the conditions of the Green Buildings Fund do not stipulate the need for geo-fencing of funds collected, it was decided that the funds would be taken from projects that took place in the relevant wards.

### Green Buildings Fund

- The Green Buildings Fund is the council's carbon offsetting fund. It is a collection of financial contributions secured by planning obligations that have been secured through Section 106 legal agreements, where a major new development has not achieved net zero carbon emissions, and a financial contribution is collected by the council for each tonne of carbon to make up shortfalls to net zero.
- Planning obligations are legal obligations entered into by the council and developer to mitigate the impacts of a development proposal. This obligation allows new developments to comply with planning policy where it has not been possible to achieve all of the required carbon emissions savings. The fund is ring-fenced to be used to 'offset' by funding a range of carbon saving projects offsite elsewhere in Southwark.
- Cabinet considered a report on 19 October 2021 and agreed the following recommendations that defined the scope and approach for the Green Buildings Fund:
  - That all secured carbon offset funding is held and consolidated in a carbon offset fund called the Green Buildings Fund to maximise carbon offsetting opportunities.
  - That the Green Buildings Fund is spent to deliver carbon offsetting projects in accordance with the council's Climate Change Strategy and Action Plan. The initial focus of offsetting projects will be the de-carbonisation and retrofitting of community buildings, schools and council housing.

- That officers will prepare recommendations with input from relevant cabinet members on which carbon offsetting projects to fund. The relevant delegated officer or the planning committee will approve the release of the funds for carbon offsetting projects using existing s106 processes.
  - That the funding criteria for carbon offsetting projects will be agreed by officers and relevant cabinet members.
  - That officers seek other sources of co-funding for the Green Buildings Fund, and review options for a new local carbon offset price in parallel to the New Southwark Plan early review, to encourage greater onsite carbon reduction performance and ensure the carbon offset price fully covers offsetting costs.
7. The Green Building Fund receives payments using a carbon offset price at £2,850 per tonne of carbon which is a rate of £95 per tonne of carbon over a 30-year period. This price was adopted in November 2020 and is applicable to all relevant major residential and non-residential schemes. The price is consistent with the price defined in the London Plan (2021). The previous carbon offset price was £1,800 at a rate of £60 per ton of carbon over a 30-year period. The majority of funds that have collected within the Green Building Fund were secured at the previous rate of £60 per tonne, with some historic contributions secured at different rates prior to 2016.

### **Green Buildings Fund - current total**

8. As of August 2022, the financial contributions collected by the council to be used to offset the total tonnes of carbon from approved planning permissions that have commenced construction or are completed total £5,710,198.49.
9. As of August 2022, the council has allocated £578,100.54 of carbon offset payments including £90,568.39 for Canal Grove Cottages approved in August 2021, and £487,532.15 for staff approved in July 2022.
10. The total amount of funding that remains to be allocated, once the requested amount in this report has been deducted, will total £5,132,097.95

### **KEY ISSUES FOR CONSIDERATION**

#### Project overview

11. A grant from the Green Buildings Fund is requested to finance energy efficiency improvement works as part of the refurbishment of up to 18 council homes at Manor Grove, within the Tustin Estate.
12. The project meets the Green Buildings Fund eligibility criteria.

13. Options for the future of the low rise homes on the Tustin Estate were developed with residents in 2019 and 2020. Due to a majority of freehold properties in Manor Grove, a final option was developed following an options survey which was the demolition and rebuild of the low rise blocks and refurbishment of the council homes in Manor Grove. Residents voted in favour of this proposal in a GLA compliant ballot.
14. Designs for the Tustin Estate low rise redevelopment programme were subsequently progressed and a planning application submitted for full consent for Phase 1 and outline consent for Phases 2-4. Phase 1 includes the Manor Grove refurbishment. The planning committee made a resolution to grant in July 2022.
15. The homes are currently in overall poor condition with a range of issues including damp, roof leaks and damage to brickwork and concrete. The homes are highly energy inefficient and tenants experience high energy costs.
16. Full refurbishment of the homes is proposed to bring these to decent homes standards, improve energy efficiency and reduce CO2 emissions. The full refurbishment scope includes roof replacements, structural repairs, removal of asbestos and new kitchens and bathrooms.

#### Scope of works

17. A Green Buildings Fund grant is requested to finance the following energy efficiency improvement measures:
  - Insulated roof decking on the new roofs
  - Solar panels
  - Wall insulation
  - New double glazed windows
  - Replacement of gas boiler systems with air source heat pump systems including mechanical ventilation and new radiators.
18. These works will substantially improve energy efficiency and deliver significant carbon savings. The works are expected to extend the serviceable life of the properties by at least 30 years.
19. Planning consent will be obtained as part of the Tustin Estate Phase 1 application.

#### Delivery

20. The refurbishment works will be undertaken by Bouygues, the contractor for the Tustin scheme.
21. Cabinet agreed the procurement strategy for a delivery partner for the Tustin Estate Low Rise Programme in July 2021, approving the use of a two-stage procurement process using the Pagabo framework. The two-stage process comprises a Pre-

Construction Services Agreement (PCSA) to deliver pre-construction services as the first stage, followed by a Development Agreement for the delivery of the scheme including the construction works as the second stage.

22. The PCSA was awarded to BY Development (trading as Linkcity) which is the development arm of construction firm Bouygues UK. Bouygues will deliver the works. A decision to enter into the Development Agreement will be considered by cabinet on 18 October 2022.
23. The Manor Grove refurbishment works are programmed to commence in spring 2023 and are anticipated to be undertaken in tranches of 4-6 properties, taking six months per tranche.
24. The contractor has extensive construction experience and a strong track record including new build and refurbishments. Specialist sub-contractors will be appointed for the energy efficiency related works including the installation of air source heat pumps.
25. Due to the scale of the works, tenants will need to move temporarily. A re-housing strategy is being developed using void properties elsewhere on the estate. Tenants will be eligible to receive disturbance payments to cover costs such as storage, post redirection and utilities disconnections and reconnections

#### Itemised costings

26. Below is a table showing the breakdown of refurbishment measures that will be taken to improve energy performance and at what cost:

<b>Area</b>	<b>Works</b>	<b>Total</b>
Roof	Insulated roof decking	37,500
Roof	PVs	63,000
External walls	Block up external cupboard under stairs	4,500
External walls	Cavity wall insulation and insulated plasterboard	160,000
External walls	External door and frame replacement	18,000
External walls	Replace dpc to 20% of properties	10,000
Windows & external doors	Replacement windows and patio doors - triple glazing	149,000
Internal walls & partitions	Remove fireplace and block up chimney	9,000
Services	Air source heat pump systems	117,000
Services	Mechanical ventilation systems	45,000

Services	Replacement radiators throughout properties	14,400
	Builders work in connection of services	8,820
	<b>Sub total</b>	<b>636,220</b>
	Contingency	63,780
	<b>Total</b>	<b>700,000</b>

### Emissions reductions

27. The sustainability and energy consultants for the Tustin scheme, Greengage, have carried out analysis to estimate the current emissions from the homes and the carbon savings that could be delivered by the proposed works. Current emissions are calculated based on EPC ratings and proposed emissions are based on performance of the proposed materials and systems.
28. The table below sets out the expected reduction in emissions that would be created by the proposed energy efficiency improvement works:

Estimated current emissions per year from the 18 properties in total (tonnes of carbon)	380.2
Estimated emissions per year following proposed works from 18 properties in total (tonnes of carbon)	35.8
<b>Estimated emissions savings per year (tonnes of carbon)</b>	<b>344.4</b>

29. The works are currently estimated at £700,000. This results in a cost of £67.75 per tonne of carbon a year over 30 years.

### Monitoring

30. Contract performance will be monitored and managed by the project management team within Southwark Construction with support from external construction project management consultants.
31. Following completion of the works, new EPC surveys will be carried out to provide a new rating and carbon emissions value.

### **Climate change implications and carbon concurrent**

#### Carbon emissions

32. The use of £700,703.45 of funding from the Green Buildings Fund to finance the proposed energy efficiency improvement measures would spend the financial contributions that have been received to offset 344.4 tonnes per annum of carbon



emissions that will be emitted by the approved new buildings within the borough over 30 years. This equates to 10,322 tonnes of residual carbon emissions in total over the 30-year period.

<b>Permission Ref</b>	<b>Account No</b>	<b>Type</b>	<b>Address</b>	<b>Amount</b>
16/AP/5235	W08275	<i>Carbon Offset (Green Fund)</i>	VARCOE SERVICE STATION 1 VARCOE ROAD, LONDON, SE16 3DG	£68,562.96
17/AP/4546	W08215	<i>Carbon Offset (Green Fund)</i>	180 ILDERTON ROAD, LONDON, SE15 1NT	£21,434.56
18/AP/3167	W08745	<i>Carbon Offset (Green Fund)</i>	151-157 TOWER BRIDGE ROAD, LONDON SE1 3JE	£9,721.80
18/AP/0710	W08735	<i>Carbon Offset (Green Fund)</i>	GARAGES, WELSFORD STREET, LONDON SE1 5RA	£31,031.74
18/AP/2895	W08785	<i>Carbon Offset (Green Fund)</i>	2 VARCOE ROAD, LONDON, SE16 3DG	£111,168.00
17/AP/3170	W08495	<i>Carbon Offset (Green Fund)</i>	18-19 CRIMSCOTT STREET, LONDON, SE1 5TE	£88,206.47
17/AP/3757	W08425	<i>Carbon Offset (Green Fund)</i>	62 HATCHAM ROAD AND 134-140 ILDERTON ROAD, LONDON SE15 1TW	£105,421.57
18/AP/0091	W08795	<i>Carbon Offset (Green Fund)</i>	DOCKLEY ROAD INDUSTRIAL ESTATE, 2 DOCKLEY ROAD, LONDON, LONDON SE16 3SF	£146,811.87
20/AP/1390	W07975	<i>Carbon Offset (Green Fund)</i>	Southwark Park Day Centre 345 Southwark Park Road London Southwark SE16 2JN	£59,982.89
17/AP/1688	W00095	<i>Carbon Offset (Green Fund)</i>	179 Ilderton Road, London, SE16 3LA.	£5,870.09
18/AP/4195	W08965	<i>Carbon Offset (Green Fund)</i>	ANTONY HOUSE AND RODERICK HOUSE, RAYMOUTH ROAD, LONDON SE16 2DJ	£52,491.50

Permission Ref	Account No	Type	Address	Amount
				£700,703.45

33. The table below shows the total emissions to be offset by the proposed works that will be drawn down on the Green Buildings Fund:

Total cost of works (£)	Current emissions per year (tonnes CO2)	Proposed emissions per year	Total reduction in emissions per year	Life time reduction in emissions (over 30 year period)	Cost per tonne of carbon per year (£)
£700,000	380.2	35.8	344.4	10,322	£67.75

34. The cost per tonne used to calculate financial contributions were secured at the previous carbon offset rate of £60 per tonne.
35. The planning permissions were identified due to the historic date that the council received the financial contribution, and the low carbon prices that were used to calculate the financial contribution. It is recognised, however, that it will be more difficult to offset carbon emissions due to the low carbon price compared to the current price of £95 per tonne.

#### Meeting Southwark's Climate Change Strategy and Action Plan

36. In July 2021, the council adopted its Climate Change Strategy and Action Plan for tackling the climate emergency. The plan sets out how emissions in the borough can be reduced from buildings, transport and waste disposal. The strategy sets out the action that the council will undertake to achieve its ambition to do all it can to achieve a net zero carbon borough by 2030 across five key priority areas.
37. The table sets out how Action Points from the Strategy will be accelerated through the funding of this project:

Action Point		Contribution towards meeting the Action Point
B.2.i	Through the Green Buildings Fund, allocate £2 million for internal capital projects that meet the eligibility criteria by 2024	This will be the first internal project to be allocated Green Buildings Fund and will provide learning for further projects.

Action Point		Contribution towards meeting the Action Point
E.1.iii	Prioritise energy efficiency improvements and maximise funding for the worst-performing social housing properties -phase 3 proposed & current works	This project is expected to raise the energy efficiency of up to 18 Southwark council homes from a rating of D or E to A.
E.3.iii	Focus on pilot schemes for low carbon homes which can inform policy, including piloting Southwark's first 'PassivHaus' council homes	This project will replace individual gas boiler systems with air source heat pumps and new ventilation and radiator systems.

### Financial implications

38. As noted above, the release of £700,703.45 of the received financial contributions will result in £5,132,097.95 remaining in the collected funds of the Green Buildings Fund to fund carbon offsetting projects.
39. The wider refurbishment works including structural work and internal renovations is expected to be funded through the Housing Investment Programme and this will be considered by cabinet on 18 October 2022.

### Community, equalities (including socio-economic) and health impacts

#### Community impact statement

40. The implementation of the Green Buildings Fund will have a positive impact for the community. Our commitment to meeting the challenge of the climate emergency opens enormous opportunity for the borough, its residents and businesses. By taking an approach that puts social justice at the centre there is an opportunity to tackle not just the climate emergency, but to reshape our borough, to create a better, fairer Southwark. The decision to release the recommended funding will deliver wider benefits, improving the quality of homes and community buildings, reducing air pollution, improving health and creating good quality green jobs through the delivery of more sustainable buildings and places.
41. This project will provide a number of benefits to council tenants at Manor Grove. Residents are currently experiencing high energy bills as these homes are heated by individual gas boilers and have minimal insulation. The proposed project will significantly reduce tenants' energy costs by providing sufficient insulation and

replacing gas boilers with air source heat pumps. This may have a significant impact in alleviating fuel poverty.

42. The properties also suffer from issues with damp which will be remediated through the proposed works, delivering significant health benefits for residents.
43. Due to the scale of the works required, tenants will need to move temporarily for health and safety reasons. A re-housing strategy is being developed to find temporary homes on the estate. The council's housing team will work very closely with tenants to support them through the relocation process and to make sure that their housing and medical needs are met.

### **Equal opportunities**

44. In everything we do as a council, we seek to promote equality. The implementation of the Green Buildings Fund to deliver energy efficiency projects will tackle the climate emergency and have a positive impact for all, including those with protected characteristics as it will reduce future carbon emissions, helping to mitigate climate change, and deliver more sustainable homes and workplaces that meet higher standards of climate change mitigation and adaptation.
45. A full Equalities and Health Impact Assessment (EHIA) for the Tustin Estate redevelopment programme, including the Manor Grove refurbishment, was completed in December 2020. This was updated in March 2022 on the basis of the planning application (Appendix 1).
46. The EHIA found that the majority vote in the residents ballot in combination with the scheme's potential to provide improved living conditions, housing quality, accessibility, public realm and community facilities presents a compelling case that the redevelopment is in the public interest. The EHIA sets out the potential risks and how the council has sought to mitigate these risks through a range of measures focused on engagement, rehousing assistance and compensation options.
47. The temporary re-housing strategy will be developed in line with the recommendations of the EHIA.

### **Resource Implications**

#### Project

48. There are no additional staffing implications for delivery of this project and staffing needs will be met through existing structures.

49. External consultants including project management consultants for the delivery of the project will be appointed in accordance with the council's Contract Standing Orders.

### **Financial implications**

50. As noted above, the release of £700,703.45 of the received financial contributions will result in £5,132,097.95 remaining in the collected funds of the Green Buildings Fund to fund carbon offsetting projects.
51. The costs of the feasibility process for this project, including design, energy assessments and cost planning, have been met through the Housing Investment Programme, as approved by cabinet in July 2021.
52. The wider refurbishment works including structural work and internal renovations is expected to be funded through the Housing Investment Programme and this will be considered by cabinet on 18 October 2022.

### **Legal implications**

53. Please see the response from director of law and governance at paragraphs 57 to 60 below.

### **Consultation**

54. This report is releasing funds from a number of Section 106 legal agreements that were secured from across the borough. As these contributions are for the purpose of funding Planning Policy officer resourcing and evidence base work for planning policy purposes, it has not been considered necessary to consult.

## **SUPPLEMENTARY ADVICE FROM OTHER OFFICERS**

### **Director of Planning and Growth**

55. The legal agreements referred to have been reviewed to ensure that they have contributed toward the Green Buildings Fund and that the funds are unallocated.
56. The proposed allocation would finance energy efficiency improvement works as part of the refurbishment of up to 18 council homes at Manor Grove, within the Tustin Estate and would improve energy efficiency and reduce CO2 emissions.

### **Director of Law and Governance**

57. Should the planning committee be satisfied with the contents of this report then it has the power to make the decisions recommended at paragraph 1 of this report by virtue of Part 3F paragraphs 9 of the council's constitution being the expenditure of funds over £100,000 secured through s106 legal agreements.
58. Carbon offset contributions from section 106 agreements have been pooled in the Green Buildings Fund since cabinet's decision to do so on 19 October 2021. The

individual contributions are compliant with the requirement of regulation 122 of the Community Infrastructure Regulation 2010 that they be directly related to the development as they are proportionate to the amount of carbon emissions generated by the development. The individual section 106 agreements require the contributions to be spent on projects that will offset the amount of carbon generated. This is consistent with the process of pooling contributions and spending the pooled funds on projects that will in aggregate offset the carbon generated by the totality of projects contributing to the pool.

59. The Equality Act 2010 introduced the public sector equality duty, which merged existing race, sex and disability equality duties and extended them to include other protected characteristics; namely age, gender reassignment, pregnancy and maternity, religion and belief and sex and sexual orientation, including marriage and civil partnership. In summary those subject to the equality duty, which includes the Council, must in the exercise of their functions: (i) have due regard to the need to eliminate unlawful discrimination, harassment and victimisation; and (ii) foster good relations between people who share a protected characteristic and those who do not. Paragraphs 44 to 47 and Appendix 1 of the report confirm that some aspects of the overall estate regeneration will have some negative effects on certain groups and that these will be addressed through mitigation and enhancement measures. Once complete the regeneration will deliver substantial positive effects. The same paragraphs and appendix confirm that the proposals support the council's equalities and human rights policies and promote social inclusion.
60. The Human Rights Act 1998 imposed a duty on the council as a public authority to apply the European Convention on Human Rights; as a result the council must not act in a way which is incompatible with these rights. The most important rights for highway and planning purposes are Article 8 (respect for homes); Article 6 (natural justice) and Article 1 of the First Protocol (peaceful enjoyment of property). The implementation of these proposals is not anticipated to breach any of the provisions of the Human Rights Act 1998.

#### **Strategic Director of Finance and Governance CAP22/024**

61. This report seeks approval from the planning committee to release the sum of £700,703.45 from the agreements listed at paragraphs 1 and 31, towards energy efficiency improvement works to council homes on Manor Grove, Tustin Estate. Details of works to be carried out are outlined at paragraphs 15-16.
62. The director of planning and growth confirms the section 106 receipts associated with the agreements listed in this report have not been allocated to other projects, and the proposed allocation accords with the terms of the agreements.

63. The strategic director of finance and governance notes the resource and financial implications at paragraphs 48-52, confirms that the council has received the related section 106 funds and they are available for the purposes outlined in this report.
64. Staffing and any other costs associated with this recommendation are to be contained within existing departmental budgets

## BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Green Buildings Fund	Constitutional Team 160 Tooley Street, London, SE1	Paula Thornton Paula.thornton@southwark.gov.uk
<b>Link (please copy and paste into your browser):</b> <a href="https://moderngov.southwark.gov.uk/documents/s102256/Report%20Green%20Buildings%20fund.pdf">https://moderngov.southwark.gov.uk/documents/s102256/Report%20Green%20Buildings%20fund.pdf</a>		
S106 Legal Agreements	Planning Division 160 Tooley Street, London, SE1	Neil Loubser 020 7525 5451
Tustin Estate Low Rise Redevelopment Delivery Programme	Constitutional Team 160 Tooley Street, London, SE1	Paula Thornton Paula.thornton@southwark.gov.uk
<b>Link (please copy and paste into your browser):</b> <a href="https://moderngov.southwark.gov.uk/mglIssueHistoryHome.aspx?IId=50025098&amp;optionId=0">https://moderngov.southwark.gov.uk/mglIssueHistoryHome.aspx?IId=50025098&amp;optionId=0</a>		

## APPENDICES

No.	Title
Appendix 1	Tustin Estate Regeneration: Equality and Health Impact Assessment, 21 March 2022 (to follow)
Appendix 2	Tustin Estate – site plan



## AUDIT TRAIL

<b>Lead Officer</b>	Dennis Sangweme, Head of Development Management	
<b>Report Authors</b>	Osama Shoush, Southwark Construction Vanessa Parry-O'Driscoll, Climate Change Project Officer	
<b>Version</b>	Final	
<b>Dated</b>	24 August 2022	
<b>Key Decision?</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments sought</b>	<b>Comments included</b>
Director of Law and Governance	Yes	Yes
Strategic Director of Finance and Governance	Yes	Yes
Director of Planning and Growth	Yes	Yes
<b>Date final report sent to Constitutional Team</b>		31 August 2022

**Tustin Estate Regeneration:  
Equality and Health Impact  
Assessment**

21 March 2022





Mott MacDonald  
10 Fleet Place  
London EC4M 7RB  
United Kingdom

T +44 (0)20 7651 0300  
mottmac.com

# **Tustin Estate Regeneration: Equality and Health Impact Assessment**

21 March 2022

## Issue and Revision Record

Revision	Date	Originator	Checker	Approver	Description
A	28/02/2022	Emma Will, Jemima Addae	Sarah Marshall	James Beard	Draft reflecting 'Hybrid' Planning Application option
B	21/03/2022	Emma Will, Jemima Addae	Sarah Marshall	James Beard	Final

**Document reference:** 418208 | 1 | B

**Information class:** Standard

---

This document is issued for the party which commissioned it and for specific purposes connected with the above-captioned project only. It should not be relied upon by any other party or used for any other purpose.

We accept no responsibility for the consequences of this document being relied upon by any other party, or being used for any other purpose, or containing any error or omission which is due to an error or omission in data supplied to us by other parties.

This document contains confidential information and proprietary intellectual property. It should not be shown to other parties without consent from us and from the party which commissioned it.

---

# Contents

<b>Executive summary</b>	<b>1</b>
Overview of the commission	1
Summary of the EHIA	1
Findings	1
<b>1 Introduction</b>	<b>2</b>
1.1 Purpose of the EHIA	2
1.2 The Equality and Health Impact Assessment	2
1.3 Overall approach to the EHIA	4
1.4 Tasks Undertaken	4
1.5 Methodology for identifying and assessing equality and health effects	5
<b>2 Tustin Estate Improvement Programme</b>	<b>7</b>
2.1 Overview: Tustin Estate	7
2.2 Renewal of the Estate	<b>Error! Bookmark not defined.</b>
<b>3 Summary of evidence</b>	<b>10</b>
3.1 Summary	10
<b>4 Area profile and proportionality</b>	<b>16</b>
2.3 Overview of the socio-demographic profile of the area	16
2.4 Overview of community resources within the Estate	17
2.5 Overview of businesses within the Estate	17
<b>5 Impact assessment</b>	<b>Error! Bookmark not defined.</b>
5.1 Impact on residents and community resources during renewal	18
5.2 Impact on businesses during renewal	20
5.3 Impact on community following renewal process	22
<b>6 Overall equality and health effects</b>	<b>24</b>
6.1 Overview: assessing equality risks and opportunities	24
6.2 Risks and opportunities during renewal	24
6.3 Risks and opportunities following renewal	29
<b>7 Conclusion and action plan</b>	<b>32</b>
7.1 Conclusion	32
7.2 Action plan	32

## Appendices 35

<b>A. Analysis of existing evidence</b>	<b>36</b>
A.1 Impact on resident and community resources during renewal	36
A.2 Impacts on businesses during renewal	41
A.2.4 Impacts on customer base	43
A.3 Impact on community following renewal process	43
<b>B. Area profile and proportionality</b>	<b>46</b>
B.1 Socio-demographic profile of the area	46
B.2 Community resources	9
B.3 Businesses	10
B.4 Health profile	10
Socio-demographic monitoring	12

## Tables

Table 2.1: Tenure mix per block	7
Table 2.2: Details of renewal options	<b>Error! Bookmark not defined.</b>
Table 3.1: Evidence summary	10
Table 4.1: Socio- demographic baseline	16
Table 4.2: List of community facilities within the Estate	17
Table 5.1: Impact on residents and community resources during renewal	18
Table 5.2: Impact on businesses during renewal	21
Table 5.3: Impact on community following renewal process	22
Table 6.1: Impact on residents and community resources during renewal (from the ballot up to delivery)	25
Table 6.2: Impact on businesses during renewal (from the ballot up to delivery)	27
Table 6.3: Impact on the Tustin Estate community following the renewal process	29
Table 7.1: Tustin Estate recommended action plan	32
Table A.14: Employment and unemployment	10
Table A.25: Median annual pay	10

## Figures

Figure 1.1: Article 149 of the Equality Act: The Public Sector Equality Duty	2
Figure 1.2: Determinants of Health	4

## Photos

Photo 2.1: Heversham House, Tustin Estate 7

## Maps

Map 4.1: Community facilities within and surrounding the Estate  
Map 4.2: Businesses within the Estate 17

# Executive summary

## Overview of the commission

Mott MacDonald has been commissioned by Southwark Council to undertake an Equality and Health Impact Assessment (EHIA) of the improvement programme (“the Programme”) for Tustin Estate, in the London Borough of Southwark.

## Summary of the EHIA

The EHIA process is focussed on the potential effects, including health effects, likely to be experienced by those living and working in the community in light of their ‘protected characteristics’ under the Equality Act 2010. It identifies any differential or disproportionate effects (both positive and negative) on those with protected characteristics that may arise from the Programme and sets out potential mitigation or enhancement measures that the Council can put in place to address them.

This EHIA presents summary equality and health findings for the ‘Hybrid’ Planning Application of the Estate, which has progressed following a vote on the outline masterplan by residents in a ballot held in February 2021.

‘Hybrid’ Planning Application is set out in more detail in Table 2.2 in Chapter 2.

## Findings

The process of research and analysis for this ‘Hybrid’ Planning Application EHIA has identified several impacts that could arise from the renewal programme, split into three broad categories: potential impact on residents and community resources during renewal; potential impact on businesses during renewal; and potential impact on the community following the renewal process.

The assessment considers the impacts of the renewal process—particularly the impact on residents and businesses. The assessment also explores the impact of the delivery of the renewed Estate on the current and future Estate community. The table below sets out findings from the assessment. Potential impacts in the first column have been identified through a review of published literature, the scope of which is based on an understanding of the context and proposed activities associated with the Estate redevelopment.

Assessment of equality effects has been undertaken in light of the characterisation of the effects –including sensitivity of the affected parties to the renewal, distribution of those groups on the Estate, nature of the effect and mitigation measures in place to address the effect. This includes reference to COVID-19 where relevant. Recommendations have been made for addressing any potential residual effects on these groups.

The assessment found that the regenerated Estate has the potential to provide improved living conditions, housing quality, accessibility, public realm and community facilities. This, coupled with the majority vote in the February 2021 ballot for the redevelopment to go ahead means there is a compelling case in the public interest for the redevelopment. Whilst this must be weighed against the acknowledged potential risks, the Council has sought to mitigate these through a range of reasonable and proportionate measures focused on engagement, rehousing assistance and compensation options in order to improve the outcomes of the redevelopment for the current and future Estate community.



# 1 Introduction

This 'Hybrid' Planning Application EHIA outlines the findings of the impact assessment for the chosen renewal option and provides recommendations for mitigation and further enhancement where appropriate.

This chapter sets out the purpose and scope of the 'Hybrid' Planning Application Equality and Health Impact Assessment (EHIA) of the improvement programme ('the Programme') of Tustin Estate, in the London Borough of Southwark. The chapter also sets out requirements of the Equality Act 2010 ('the Equality Act'), the approach to EHIA, and tasks undertaken throughout this process.

## 1.1 Purpose of the EHIA

The purpose of the EHIA is to help Southwark Council ('the Council') understand the potential risks and opportunities of the illustrative masterplan of the chosen renewal option, with a particular focus on people with characteristics protected under the Equality Act and the health of the local population (including on health inequalities).

Protected characteristics include the following (as defined by the Equality Act):<sup>1</sup> age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex, and sexual orientation.

This 'Hybrid' Planning Application EHIA outlines the findings of the impact assessment for the chosen renewal option and provides recommendations for mitigation and further enhancement where appropriate.

## 1.2 The Equality and Health Impact Assessment

This 'Hybrid' Planning Application EHIA sets out the key potential equality and health impacts of the chosen renewal option for Tustin Estate. The approach to this report includes components of both Equality Impact Assessment (EqIA) and Health Impact Assessment (HIA).

### 1.2.1 Equality Impact Assessment

#### 1.2.1.1 The Public Sector Equality Duty

This EHIA has been undertaken as part of a process supporting the fulfilment of the Council's obligations under current UK equality legislation, and in particular the Equality Act. The Equality Act sets out a Public Sector Equality Duty (PSED), at section 149 and is set out in Figure 1.1 below.

**Figure 1.1: Article 149 of the Equality Act: The Public Sector Equality Duty**

- (1) A public authority must, in the exercise of its functions, have due regard to the need to—
- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
  - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
  - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- (2) A person who is not a public authority but who exercises public functions must, in the exercise of those functions, have due regard to the matters mentioned in subsection (1).
- (3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—
- (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
  - (b) 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;
  - (c) 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.

Source: Equality Act 2010

The PSED is intended to support good decision-making. It encourages public authorities such as the Council to understand how different people will be affected by their activities. This means services and policies are appropriate and accessible to all and meet different people's needs. The Council must demonstrate that it has shown due regard to the aims of the PSED throughout the decision-making process to deliver the Programme. The process used to do this must take account of the protected characteristics which are identified below in section 1.1.1.1.

<sup>1</sup> Government Equalities Office/Home Office (2010): 'Equality Act 2010' Available at: [www.legislation.gov.uk](http://www.legislation.gov.uk)

### 1.2.1.2 Protected characteristics

An EqIA provides a systematic assessment of the likely or actual effects of policies or proposals on social groups with the following protected characteristics (as defined by the Equality Act):<sup>2</sup>

Protected characteristic	Equality and Human Rights Commission (EHRC) definition
Age	A person belonging to a particular age (for example 32-year olds) or range of ages (for example 18 to 30-year olds).
Disability	A person has a disability if she or he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.
Gender reassignment	The process of transitioning from one gender to another.
Marriage and civil partnership	Marriage is a union between a man and a woman or between a same-sex couple. Couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples (except where permitted by the Equality Act).
Pregnancy and maternity	Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.
Race	Refers to the protected characteristic of race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.
Religion and belief	Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (such as Atheism). Generally, a belief should affect someone's life choices or the way they live for it to be included in the definition.
Sex	A man, woman or non-binary person.
Sexual orientation	Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

An EqIA does this through the following approaches:

- Assessing whether one or more of these groups could experience disproportionate effects (over and above the effects likely to be experienced by the rest of the population) as a result of the proposed renewal option. An EqIA includes examining both potential positive and negative effects.
- Identifying opportunities to promote equality more effectively.
- Developing ways in which any disproportionate negative effects could be removed or mitigated to prevent any unlawful discrimination and minimise inequality of outcomes.

### 1.2.1.3 Assessing equality impacts

While the PSED does not specify a particular process for considering the likely effects of policies, programmes and projects on different sections of society for public authorities to follow, this process is usually undertaken through some form of equality analysis, which can include EHIA's.

Undertaking an EHIA helps to demonstrate how a public authority is complying with the PSED by:

- providing a written record of the equality and health considerations which have been taken into account;

- ensuring that decision-making includes a consideration of the actions that would help to avoid or mitigate any negative impacts on particular protected groups; and
- supporting evidence-based and more transparent decision-making.

By understanding the effect of their activities on different people, and how inclusive delivery can support and open opportunities, public bodies can be more efficient and effective. The EHIA process therefore helps public bodies to deliver the Government's overall objectives for public services.

### 1.2.1.4 Local Planning Policy

As well as meeting the requirements of the Equality Act (see section 1.2), the following local planning policy and strategy documents have a bearing on this assessment'

Southwark Plan 2022 Policy

- SP2 Southwark Together
- SP5 Thriving Neighbourhoods and tackling health inequalities
- P1 Social rented and intermediate housing
- P7 Housing for older people
- P8 Wheelchair accessible and adaptable housing
- P33 Business relocation
- P47 Community uses
- P65 Improving air quality

London Plan 2021 Policy

- GG1 Building strong and inclusive communities
- GG3 Creating a healthy city
- SD1 Opportunity areas
- SD10 Strategic and local regeneration
- T2 Healthy Streets

<sup>2</sup> Government Equalities Office/Home Office (2010): 'Equality Act 2010'. Available at: [www.legislation.gov.uk](http://www.legislation.gov.uk)

## 1.2.2 Health Impact Assessment

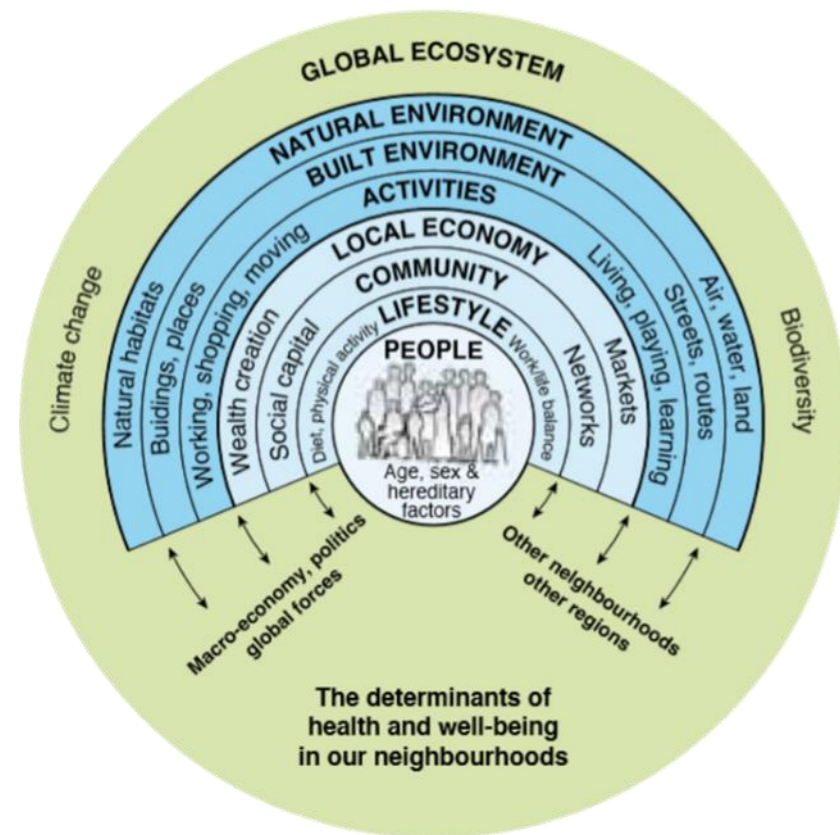
### 1.2.2.1 Assessing health impacts

Health as a component of the EHIA will focus on assessing whether certain sections of the population (based on the protected characteristic groups defined above) will experience health impacts disproportionately or differentially when compared to other sections of the population. The HIA component of this assessment identifies potential health risks and opportunities associated with the renewal option, focussing on key health aspects of the regeneration process (e.g. relocation, construction effects) and how this intersects with health inequalities. The mitigations Southwark has in place to prevent adverse effects on health for vulnerable sections of society are also outlined.

### 1.2.2.2 Determinants of health

The approach to the HIA aspect of this report uses the World Health Organization's (WHO) definition of health as a 'state of complete physical, mental and social well-being and not merely the absence of disease or infirmity'. Health inequity (avoidable differences in health) was considered, introducing a notion of fairness. The figure below highlights the determinants of health in a community context.

Figure 1.2: Determinants of Health



Source: Barton and Grant (2006) The health map, based on a public health concept by Whitehead and Dahlgren, The Lancet 1991. Department for Health (2010) Health impact assessment of government policy

## 1.3 Overall approach to the EHIA

The approach to EHIA employs the bespoke Mott MacDonald INCLUDE toolkit, which sets out the following steps:



## 1.4 Tasks Undertaken

The 'Hybrid' Planning Application EHIA is the third EHIA produced, aligned with the decision-making process on the Estate.

The Initial EHIA comprised a series of tasks undertaken to understand the equality and health effects of the original five scenarios put forward for the renewal of the estate. Once potential effects were identified, they were assessed against the renewal scenario. The initial EHIA was used to inform the residents ahead of the initial ballot in September 2020.

The Final Option EHIA was intended to provide further detail and analysis on the Final Option that was selected by residents and being taken forward by Southwark Council.

This 'Hybrid' Planning Application considers to the updates to provides updated detail and analysis of the final chosen masterplan for the renewal .

Within the steps above, the following tasks were undertaken to deliver the assessments:

### 1.4.1 Understanding the project

**Discussion with Southwark Council:** Initial discussions were undertaken with the Council to gain a better understanding of the Estate and the approach to the Programme. A further discussion was undertaken prior to beginning the EHIA of the 'Hybrid' Planning Application to receive an update on the Programme.

**Estate walkover:** A visit to the Estate was undertaken in December 2019. The visit included a viewing of the low-rise blocks on the Estate: Ullswater House, Hillbeck Close, Heversham House, Kentmere House, and Manor Grove; Pilgrims Way Primary School; and the Tustin Community Centre.

**Review of renewal proposals:** A review of documentation associated with the renewal, planned mitigation measures and impacts on residents was undertaken on an ongoing basis, as it was produced. This was repeated for the Final Option and 'Hybrid' Planning Application Option.

### 1.4.2 Evidence, distribution, and proportionality

**Initial desk-based evidence and literature review:** In order to better understand the potential risks and opportunities arising from the redevelopment, and to help to identify possible mitigation measures and opportunities associated with the programme, relevant published literature from governmental, academic, third sector and other sources were reviewed and updated throughout all EqlA stages. This allowed for the characterisation of potential risks and opportunities typically associated with estate regeneration and relocation, to understand whether they applied in this instance.

This process was repeated for the 'Hybrid' Planning Application EHIA, to update the literature and capture any potential new effects.

**Demographic analysis of the Estate and surrounding area:** A social and demographic profile of Tustin Estate was collated using publicly available data and compared to wider social and demographic data for Southwark, London and England. This work was undertaken in the baseline stage and updated in subsequent stages to reflect newly available data.

### 1.4.3 Engagement and analysis

**Residents Project Group meetings:** The EqlA team participated in three Residents Project Group (RPG) meetings between December 2019 and February 2020 to provide ongoing background, information and updates on the EHIA process and findings. Input to the EHIA from the RPG was provided through this process.

**Drop-in events:** Presented the EHIA process and findings at a design options drop-in event in February 2020 and a final options drop-in event in March 2020 to provide the wider Estate community with information about the EHIA, gather feedback on how they felt the proposals would affect them and help them understand the differences between the options from an equality and health perspective.

**Youth session:** Provided input to a youth session run by Common Grounds (the architects commissioned to design the options) and reviewed the engagement summary. It was important to engage youth in this process as, while typically affected by activities concerning regeneration and community planning, they are often under-engaged in mainstream consultation activities. This youth session forms part of a longer running youth engagement strategy which aims to set up a Young Persons Steering Group for the Estate with the potential for advising on future governance and engagement.

The session provided an overview of the current project and allowed young people to share local knowledge and insight. The intention of this was to understand shared experiences and think of possible design interventions to facilitate their vision for the local area they live in.

**Analysis of Starting the Conversation Questionnaire:** The autumn 2019 'Starting the Conversation' questionnaire conducted by Southwark Council aimed to understand the household needs of residents and picked up some common themes relating to particular equality groups around how the Estate could be improved. Feedback is incorporated in Chapter 3 Equality Risks and Opportunities. Analysis of demographic information with respect to who was engaged through the questionnaire is incorporated in the Appendix.

**Final Option Engagement Session:** An engagement session was held in November 2020 to take local residents through the final Final Option for the redevelopment, and present on the EHIA process. The session took attendees through the potential equality impacts of the development, as well as Southwark Councils plan to mitigate these. Feedback was also received on areas important to the attendees in making their decisions; and their thoughts on the future of the

estate. Co-design workshops were held with residents DDG sub-group which focused on design progress and invite discussion on key issues and potential resolution. The workshops were held monthly between 28<sup>th</sup> October and 25<sup>th</sup> November 2021, which looked to gain their views on the below themes:

- Community facilities and landscape 28<sup>th</sup> October
- Manor Grove design workshop. 13<sup>th</sup> November and 2<sup>nd</sup> December
- Sustainability, energy and transport. 25<sup>th</sup> November

### 1.4.4 Impact assessment

**Assessment of potential impacts:** Potential impacts were identified and assessed using the research undertaken in the stages above. Assessment of impacts was undertaken in light of the sensitivity of the affected parties to regeneration and relocation, and distribution of people with protected characteristics amongst residents of the Estate. Both adverse and beneficial impacts were identified in the context of the mitigation measure implemented by the Council.

Types of equality effects considered: Potential effects arising from the redevelopment will be assessed as either differential or disproportionate.

- **Differential effects:** Differential effects occur where people with protected characteristics are likely to be affected in a different way to other members of the general population. This may be because groups have specific needs or are more susceptible to the effect due to their protected characteristics. Differential effects are not dependent on the number of people affected.
- **Disproportionate effects:** Disproportionate effects occur where there is likely to be a comparatively greater effect on an equality group than on other sections of the general population. Disproportionate effects may occur if the affected community includes a higher than average proportion of people with a particular protected characteristic, or because people from a particular protected characteristic group are the primary users of an affected resource.

**Action planning and making recommendations:** An action plan has been developed which outlines the responsibilities to involved affected parties following submission of the 'Hybrid' Planning Application EHIA. A series of further recommendations have been developed to help manage the renewal process in a way that minimised the potential for adverse effects where appropriate.

## 1.5 Methodology for identifying and assessing equality and health effects

### 1.5.1 Assessing equality and health effects

The assessment of effects across the EHIA process is predominantly qualitative and outlines the nature of the impact on:

- residents living in low-rise and tower blocks on Tustin Estate;
- commercial properties on Tustin Estate, including employees and customer bases;
- community facilities on Tustin Estate and their service users;
- owners of residential and commercial property on Tustin Estate; and
- the local community.

The assessment considers:

- whether the proposed renewal option will have a positive or negative effect on the lives of those who live in the area;
- the relationship of the effect to the renewal option proposed within the Programme (e.g. direct relationship such as loss of property or indirect relationship such as loss of access to services);
- the severity of change; and
- the resilience of those who are affected.

## 2 Tustin Estate Improvement Programme

This chapter sets out the context of Tustin Estate and the renewal option proposed as part of the improvement programme. It provides background to the Estate including its history and current situation, before outlining the final renewal proposal.

### 2.1 Overview: Tustin Estate

Tustin Estate is a five-hectare brick-built housing estate located in the London Borough of Southwark, on the Southwark and Lewisham border. Constructed in the 1960s and 1970s, the Estate is made up of 526 properties spread over six low-rise blocks and three 20 storey towers; a one form entry Primary School, retail units, Tustin Community Centre, open space, resident parking and a district heating system. Many of the blocks are in need of significant reinvestment; and there is currently major renovation works underway on the three tower blocks as part of a separate improvement programme. Consequently, this assessment focuses on the low-rise blocks as they are the subject of focus for the proposed option for improvement.

The tenure mix of households eligible for rehousing per low rise block subject to demolition as of June 2021 is listed in Table 2.1 below. Previous versions of this EHIA included 47 temporary accommodation households in Ullswater House. These households were moved to alternative accommodation during the COVID-19 pandemic as the homes were not self-contained. As a result The Manor Grove homes have also not been included as these are not subject to demolition.

**Table 2.1: Tenure mix per block**

Block	Total no. of properties	Temporary Accommodation Tenants <sup>3</sup>	Applicants on housing waiting list	Council Tenants	Leasehold	Freehold	Void
Bowness House	34	1	3	18	15	0	0
Heversham House	98	4	16	66	28	0	0
Hillbeck Close	32	3	0	20	5	0	4
Kentmere House	38	4	8	31	3	0	0
<b>Total</b>	<b>202</b>	<b>12</b>	<b>27</b>	<b>135</b>	<b>51</b>	<b>0</b>	<b>4</b>

Source: Southwark Council (correct as of February 2022. Housing waiting list correct as of June 2021)

<sup>3</sup> subsequent to the effects of Covid 19 this block has been decanted to allow for social distancing practices to be adhered to.

**Photo 2.1: Heversham House, Tustin Estate**



Source: Southwark Council

### Housing Need

The Housing Needs Assessment process was started in 2019 as part of the options development process. In advance of the ballot, before the pandemic, housing needs assessments for all residents were administered by Resident Services Officers making an appointment by phone to visit residents at home to complete the assessment. During the pandemic, the assessments were completed by phone. Where Resident Services Officers were not able to contact residents, the council asked the appointed independent tenant and homeowner adviser to visit and arrange for the assessment to be completed.

Following the ballot and cabinet approval of the re-housing strategy for Phase 1 (Hillbeck), in-depth housing needs assessments (attached) were undertaken with Hillbeck residents. At times when COVID-19 restrictions were not in place, the Resident Services Officer made an appointment with residents to visit and complete the assessment. During COVID-19 restrictions, assessments were completed over the phone. Assessments were completed with all residents and resident leaseholders. The Resident Services Officer has also supported the private tenants of non-resident leaseholders to provide housing advice. A similar approach will be taken for later phases.

The accessibility needs of residents were taken into consideration in completing the assessment – for example one resident who is hard of hearing preferred for the assessment and ongoing discussions to be done by text message.

In January 2022, a Housing Needs Assessment was carried out by Southwark Council in order to identify the sizes of homes required by the current residents of the Estate after renewal. A

summary of current need to be met by the new Estate, as broken down by current residence, is found in the table below.

**Table 2.2: Housing Needs Assessment**

Summary of Need	1 Bed	2 Bed	3 Bed	4 Bed	5 Bed	Total
Bowness House	0	0	25	3	0	28
Heversham House	15	20	41	7	1	84
Hillbeck Close	22	0	0	0	0	22
Kentmere House	27	0	0	0	0	27
<b>Totals</b>	<b>64</b>	<b>20</b>	<b>66</b>	<b>10</b>	<b>1</b>	<b>161</b>

Source: Southwark Council (correct as of February 2022)

## 2.2 Renewal of the Estate

### History of Tustin Estate regeneration

Southwark Council is the biggest social landlord in London and has committed to delivering a target of 11,000 new council homes for social rent by 2043. Tustin Estate is also subject to the Southwark Planning policy framework, including the Old Kent Road Area Action Plan which establishes a minimum target of 20,000 new homes and 10,000 new jobs in the area.

It has launched a 'Great Estates' programme, with the aim of guaranteeing that every estate is clean, safe, and cared for, and to give residents the opportunity to improve their estate. Tustin Estate is intended to be a leading example of this programme.

In 2016 Tustin Estate residents were engaged in discussions about the future of the estate, and as a result of these discussions it was determined that Southwark would undertake a major refurbishment programme of the three high rise towers. No decision was made with regard to the low rise blocks and consequently no major investment has been made.

The council has since reengaged with residents through the Tustin Community Association (TCA) and has worked with local representatives and the community to develop detailed options for the future of the Estate that were taken to ballot in September 2020 and February 2021.

### Renewal scenarios

#### Initial options

Options for the Programme were developed by Common Grounds, taking account of feedback from Tustin Estate residents, the Council and other consultants involved in the process to date.

Five scenarios were initially considered for the redevelopment of the Estate:

- Option 1 simply involved the maintenance of the Estate with no new builds
- Option 2 and 3 required part refurbishment/part demolition of the Estate and new builds
- Option 4 required the complete demolition and rebuild of the Estate
- Option 5 required almost complete demolition of the estate, with the exception of Manor Grove, which would be maintained and infilled with new homes.

### Impact of COVID- 19

Due to the emergence of the COVID- 19 pandemic in March 2020, and subsequent national restrictions, Southwark Council temporarily postponed the consultation and engagement period designed to whittle down the five options. In July 2020, as some restrictions began to lift after the first lockdown, the consultation was re- started to refresh residents' memories on the options and continue conversations regarding the renewal options. Social distancing requirements meant that gatherings of groups was not permitted, and therefore additional efforts were made to ensure that residents continued to receive the information they required through online RPG meetings and public events, letter drops, telephone calls (including with those residents known to be vulnerable or requiring additional assistance in interpreting information), and socially distanced one to one meetings where required.

### Residents Ballot

In September 2020, residents were asked to rank the options in order of preference in a ballot. Option 4, which would see the full redevelopment of the Estate, including Manor Grove, was the favoured option of all blocks on the Estate with the exception of Manor Grove residents. Manor Grove is where all freeholders on the Estate live.

Option 5 was the second most favoured option for Manor Grove residents, just following Option 1.

### Announcement of Final Option

The decision on which option to take forward was based on the results of the options survey, its alignment with council policies and aims, and supporting information in the Cost Benefit Analysis and the EHIA. It was determined that the Final Option for the Estate was Option 5 - the complete demolition and re-provision of all blocks with the exception of Manor Grove. The Manor Grove homes would be retained and refurbished, with infill housing established. The decision to proceed with Option 5 was based on taking all of the above information into account, and because it allows for the benefits of both Option 4 and Option 5 to be realised.

The Final Option was taken to a ballot of residents in February 2021, with the option to vote Yes or No on the Final Option. The majority of residents (87% of a 64% turnout) voted Yes to take forward the Final Option and redevelop the Estate,

### 'Hybrid' Planning Application

After the Residents Ballot voted Yes to take forward the redevelopment of the Estate, Southwark's Cabinet approved the delivery plan including appointing a design team to develop a Masterplan for planning submission. Details of the Masterplan are presented in the following table.

Table 2.3: 'Hybrid' Planning Application breakdown

	Refurbishment	Decanting and demolition	New Homes	Retail offerings and community facilities	Public realm offerings
'Hybrid' Planning Application	<ul style="list-style-type: none"> <li>Manor Grove refurbishment to the following standard: <ul style="list-style-type: none"> <li>Every home will have the option of being refurbished to meet Decent Homes Standard, Southwark Standard</li> <li>New kitchens and bathrooms for council tenants when these are due for replacement.</li> <li>Energy efficiency improvements.</li> <li>Improvements to bin stores.</li> <li>Improvements to communal entrances.</li> </ul> </li> <li>Total number of 49 homes maintained</li> </ul>	<ul style="list-style-type: none"> <li>Decanting, demolition and re-provision of all blocks with the exception of Manor Grove.</li> </ul>	<ul style="list-style-type: none"> <li>Replacement of all existing homes subject to demolition including 200 Council homes and 49 leasehold</li> <li>Total of 689 new homes, of which 68% will be affordable</li> <li>Dedicated housing provision for key workers</li> <li>60% of homes available for affordable rent, including some reserved for key workers</li> <li>All new homes will achieve zero net carbon</li> <li>Dedicated housing for the over 55's</li> <li>New family homes with gardens</li> <li>All new homes will meet the Wheelchair User Dwelling Standards, and 10% will meet the Adaptable Dwellings Standard.</li> </ul>	<ul style="list-style-type: none"> <li>Reprovision of retail units, with an assumed number of 10 businesses of 100sqm.</li> <li>Additional commercial space of 142 sqm.</li> <li>1,380 sqm of non-residential reprovision in total</li> <li>Relocation options on Tustin Estate on an interim or permanent basis.</li> <li>New school building at the heart of the estate, with space to accommodate future extension to a 2 form entry provision.</li> <li>EV charging points</li> </ul>	<ul style="list-style-type: none"> <li>Enhanced and enlarged green space at the heart of the estate, with provision for landscaped play, social and visual amenity for residents.</li> <li>Priority for pedestrians through new estate, with new pedestrian routes and limited vehicle movements.</li> <li>Improvements to fencing.</li> <li>Improved lighting.</li> <li>Clearer and more secure routes for people passing through the estate.</li> <li>New 'Quiet Route' through estate to enable new walking and cycling routes.</li> <li>Majority of trees retained, and new trees planted for a net gain in trees.</li> <li>New play facilities.</li> </ul>



## 3 Summary of evidence

This chapter sets out a summary of evidence. It includes existing evidence potential equality effects associated with the Tustin Estate Improvement Programme and associated protected characteristic groups who may be disproportionately affected, based on the initial desk-based review, as well as a summary of resident feedback.

### 3.1 Summary

The below table summarises the existing evidence of potential effects and associated protected characteristic groups who may be disproportionately affected. This includes reference to COVID-19 where relevant as well as a summary of key stakeholder feedback. Risks are defined as potential adverse effects resulting from the Programme, and opportunities are defined as potential benefits. Protected characteristic groups include those defined in Chapter 1. For the purposes of this EHIA, sub-groups have been identified within certain protected characteristic group categories based on the desk-based evidence review to improve the assessment.

- Within 'age', all age ranges are considered, but specific sub-groups include children (aged under 16), younger people (aged 16-24), and older people (aged over 65).
- Within 'race', all races and ethnicities are considered, but the sub-group of ethnic minority is identified to refer to non-White British communities.
- Within 'religion and belief', all religious and belief groups are considered, but the term 'Minority faith groups' refers to religious groups who are not Christian (Buddhist, Hindu, Jewish, Muslim, Sikh, and 'other').
- Within 'sexual orientation' and 'gender reassignment', all sexual orientations and gender statuses are considered, but the 'Lesbian, Gay, Bisexual, Transgender Plus' (LGBT+) community is considered together.
- Within 'sex', the sub-groups of men and women are used.
- Within 'pregnancy and maternity', pregnant women are reported as a sub-group where the effect only relates to pregnancy.

**Table 3.1: Evidence summary**

Effects on residents during the renewal process	Affected groups	Risk or opportunity	Key resident feedback
<p><b>Loss of social infrastructure and access to community resources:</b></p> <p>The renewal process can involve temporary or permanent resettlement of residents and demolition of housing and community resources. This can lead to the risk of loss of social infrastructure and access to these resources. In particular, it can increase residents' distances from facilities or places of social connection located on or in close proximity to their neighbourhood.</p> <p>The ongoing COVID-19 pandemic and regulations have had already had an impact on access to social infrastructure and resources, and as such any further impacts may have cumulative negative effects, especially on older people and disabled people.</p> <p>This can lead to increased stress and anxiety in children who may need to change school; and loneliness and isolation in older people which can turn to negative health outcomes such as poor mental health and obesity. Disabled people and pregnant women may also experience negative health impacts from this, including increased stress and anxiety.</p>	<ul style="list-style-type: none"> <li>• Children</li> <li>• Older people</li> <li>• Disabled people</li> <li>• People from ethnic minority backgrounds</li> <li>• Minority faith groups</li> <li>• Pregnancy and maternity</li> </ul>	Risk	<p>A poll of residents in attendance at an online engagement event undertaken in November 2020, a majority of attendees selected social impact and community as one of the most important areas they would consider whilst making their decision about the future of the Estate.</p> <p>In an Estate walkaround in August 2021, residents fed back that they like the communal garden and terraces currently at Kentmere. Residents also fed back that they enjoyed the deck access to the properties as it provided space for social interaction. Residents highlighted that they liked the existing green space.</p>

Effects on residents during the renewal process

	Affected groups	Risk or opportunity	Key resident feedback
<p><b>Access to finance:</b> Where renewal schemes require residents to resettle, it can lead to an increase in their financial outgoings due to costs associated with moving and obtaining new housing. Relocation costs could include removal services, the need to adapt a new home or buy new furniture. Access to the required finance to obtain new housing may be most limited for those at risk of financial exclusion, who experience difficulty accessing appropriate and mainstream financial services, such as bank accounts, loans and mortgages.</p>	<ul style="list-style-type: none"> <li>• Young people</li> <li>• Older people</li> <li>• Disabled people</li> <li>• People from ethnic minority backgrounds</li> <li>• Women</li> </ul>	Risk	<p>At an online public event, residents raised concerns about the affordability of new homes, and the costs associated with moving.</p>
<p><b>Appropriate, accessible and affordable housing</b> Where renewal schemes require the resettlement of many residents, issues can arise regarding sourcing suitable housing that meets the needs of families with children, people requiring adaptable and accessible housing, and people seeking affordable housing. A lack of suitable housing can lead to families living in overcrowded properties. Overcrowding can lead to negative impacts on children’s health, putting them at increased risk of developing respiratory conditions, infections, psychological problems, SIDS, and stress. Health effects caused by poor housing, such as respiratory disease, is more likely to impact upon older people.</p>	<ul style="list-style-type: none"> <li>• Children</li> <li>• Disabled people</li> <li>• People from ethnic minority backgrounds</li> </ul>	Risk	<p>At a public event, residents wanted to hear about how the different options will address the current accessibility issues of the existing homes, as existing homes do not have appropriate space for those with mobility difficulties.</p> <p>A poll of residents in attendance at an online engagement event undertaken in November 2020, a majority of attendees noted that they felt the No vote option would not address the issue of overcrowding.</p> <p>In an Estate walkaround in August 2021, residents fed back that they liked the existing generous size of homes.</p>
<p><b>Health effects:</b> Relocation can have a negative impact on an individual’s mental health and well-being. Relocation can create a great deal of stress and anxiety amongst children, young people and older people due to the need to adapt to new routines, facilities and surroundings. Health effects may also arise as a result of the environmental effects of demolition and construction processes. Health effects may also result from social isolation due to housing relocation, and impacts of the COVID-19 pandemic, such as poorer mental health, obesity, alcoholism, and a greater risk of hospitalisation. Older people and disabled people are also likely to be disproportionately affected by changes in air quality that may arise during any construction period as increased air pollution can impact upon underlying respiratory conditions. Air pollution can also contribute to health impacts in young children, including long term cognitive issues and neurodevelopment. Additionally, antenatal exposure to air pollution may alter the lung development of a baby whilst in the womb. If a baby is exposed to significant levels of air pollution, this can increase the risk of premature birth and low birth weight Noise pollution can also have adverse health impacts including sleep disturbance and stress.</p>	<ul style="list-style-type: none"> <li>• Older people</li> <li>• Disabled people</li> <li>• Pregnant women</li> <li>• Children</li> </ul>	Risk	<p>Some residents fed back concerns with how the construction elements of the refurbishment and infill options would work, particularly questioning if residents would be expected to remain living in their homes during construction.</p> <p>A poll of residents in attendance at an online engagement event undertaken in November 2020, a majority of attendees identified health and wellbeing as one of the most important areas they would consider whilst making their decision about the future of the Estate.</p>
<p><b>Safety and security:</b> In the lead up to the renewal process and during the decanting and demolition of properties in the area, properties will be vacated and can fall into disrepair. This can attract unwanted activity including anti-social behaviour and crime, which can affect those who are more likely to be a victim or witness of crime or those who are more fearful of crime. It has been suggested that fear of crime can contribute to social isolation, particularly for vulnerable groups such as women, older people, children and ethnic minority groups.</p>	<ul style="list-style-type: none"> <li>• Young people</li> <li>• Disabled people</li> <li>• People from ethnic minority backgrounds</li> <li>• LGBT+ people</li> <li>• Men</li> </ul>	Risk	<p>Tustin Estate residents mentioned that the existing security, ASB issues on the Estate.</p> <p>A poll of residents in attendance at an online engagement event undertaken in November 2020, a majority of attendees identified safety as one of</p>

Effects on residents during the renewal process

	Affected groups	Risk or opportunity	Key resident feedback
	<ul style="list-style-type: none"> <li>• Older people</li> <li>• Women</li> <li>• Children</li> </ul>		the most important areas they would consider whilst making their decision about the future of the Estate.
<p><b>Accessibility and mobility in the area:</b> Evidence has indicated that during construction the accessibility and mobility of the local area can be affected. In particular, construction can cause difficulties in relation to increased traffic in the local area, reducing parking (construction vehicles and subcontractors in parking), the construction activities blocking access to homes, shops, bus stops and pavements and safe routes, as well as effects on wayfinding.</p>	<ul style="list-style-type: none"> <li>• Older people</li> <li>• Disabled people</li> </ul>	Risk	<p>Residents at a public event raised the importance of maintaining parking availability throughout construction.</p> <p>Residents at an Estate walkaround in August 2021 highlighted that motorbikes and scooters use existing pedestrian pathways to short cut through estate Residents also commented that the current private vehicle routes reduce safety and visibility around the greenspace in the estate.</p>
<p><b>Information and communication:</b> The process of regeneration often requires two-way communication between residents and the council and or housing authorities in order for residents to understand the option available to them. The process of relocation itself also requires communication with a variety of organisations including the council, housing associations and removal companies. Such communication could be direct via the phone, face to face or over email, or could be indirect via websites, leaflets etc. Some groups of individuals may find communication more challenging than others and this is likely to depend upon the exact method and format of communication.</p>	<ul style="list-style-type: none"> <li>• Older people</li> <li>• Disabled people</li> <li>• People from ethnic minority backgrounds</li> </ul>	Risk	In a poll of residents in attendance at an online engagement event undertaken in November 2020, a majority of attendees agreed that the Cost Benefit Analysis and Initial Equality and Health Assessment were useful in helping them to make a decision about the future of the Estate.

Effects on businesses during the renewal process

<p><b>Potential redundancy of employees associated with business loss or relocation:</b> The renewal process may result in the closure and relocation of businesses. These changes may result in business owners becoming unemployed, redundancies or in current staff being unable to access ongoing employment at a different location. Older people, disabled people and minority ethnic people may particularly be at risk if faced with redundancy and/or extended periods of unemployment due to typically facing additional barriers in securing interviews and offers of new employment. In addition, older people are more likely to be self-employed, meaning that they could face further barriers in finding new roles in the labour market. Closure or relocation may affect the customer base and net revenue of businesses, resulting in restructuring and redundancy of staff as a result.</p>	<ul style="list-style-type: none"> <li>• People from ethnic minority backgrounds</li> <li>• Older people</li> <li>• Disabled people</li> <li>• Young people</li> <li>• Women</li> </ul>	Risk	No feedback received on this topic. There will be further engagement with businesses as the detailed design moves forward.
<p><b>Potential loss of business:</b> The renewal process may result in the closure and relocation of businesses. Research evidence shows that minority ethnic people are more likely to be self-employed and twice as likely to be in precarious work conditions than their White British counterparts in the UK. In addition, older people are also more likely to be self-employed, representing one in five self-employed population in the UK, placing them at potentially greater risk where businesses are affected.</p>	<ul style="list-style-type: none"> <li>• People from ethnic minority backgrounds</li> <li>• Older people</li> </ul>	Risk	No feedback received on this topic. There will be further engagement with businesses as the detailed design moves forward.
<p><b>Impact of redundancy on health and well-being:</b> Involuntary job loss due to redevelopment and renewal can have disproportionate health and well-being effects for certain groups. Older workers are at an increased risk of cardiovascular disease due to increased stress resulting from contributing factors such as a lower likelihood of re-employment, a substantial loss of income and the severance of work-based social interactions. Redundancy can create an increased risk of family tension and disruption, and that job loss for a parent can have detrimental effects on children including lowered self-esteem and socio-psychological well-being.</p>	<ul style="list-style-type: none"> <li>• Older people</li> <li>• Children</li> </ul>	Risk	No feedback received on this topic. There will be further engagement with businesses as the detailed design moves forward.

## Effects on residents during the renewal process

	Affected groups	Risk or opportunity	Key resident feedback
<p><b>Access to commercial finance:</b> For businesses, redevelopment and renewal may result in relocation or closure. This may result in a need to access finance to secure new premises, which can be more difficult for particular groups.</p>	<ul style="list-style-type: none"> <li>• People from ethnic minority backgrounds</li> </ul>	Risk	No feedback received on this topic. There will be further engagement with businesses as the detailed design moves forward.
<p><b>Impact on customer base:</b> Potential closure or relocation of businesses could reduce the availability of services in the local area. Research evidence suggests that certain groups, such as older people, disabled people and minority ethnic groups may be more reliant on existing networks and links to shops and commercial services. As a result, sudden changes in locations of businesses could reduce their access to services and lead to social isolation and negative mental health outcomes.</p>	<ul style="list-style-type: none"> <li>• Older people</li> <li>• Disabled people</li> <li>• People from ethnic minority backgrounds</li> </ul>	Risk	No feedback received on this topic. There will be further engagement with businesses as the detailed design moves forward.

## Effects on community following renewal process

<p><b>Tackling crime and disorder:</b> Levels of crime have in part been attributed to the urban environment. It has been argued that the opportunity for some forms of crime can be reduced through thought-out approaches to planning and design of neighbourhoods and towns. Reducing potential for crime can affect those more likely to fear crime or be a victim or witness of crime.</p>	<ul style="list-style-type: none"> <li>• Young people</li> <li>• Disabled people</li> <li>• People from ethnic minority backgrounds</li> <li>• LGBT people</li> <li>• Men</li> <li>• Older people</li> <li>• Women</li> <li>• Children</li> </ul>	Opportunity	<p>Tustin Estate residents mentioned the need to improve security, safety on the Estate and address ASB.</p> <p>In a residents feedback event held in December 2021, residents stressed the need for safety to be built into the design of the new estate, eg. with better lighting, overlooking of public space, and security.</p>
<p><b>Improved access, mobility and navigation:</b> Renewal processes open up opportunities to create spaces and places that can be accessed and effectively used by all, regardless of age, size, ability or disability, using principles of inclusive design. There are a number of equality groups who can experience difficulties with access, mobility and navigation who could benefit from improvements in this area. Children who cannot move about safely and independently on foot and bicycle often become less physically active, reducing opportunities for children to develop certain cognitive, motor and physical skills – as well as contributing towards childhood obesity risks.</p>	<ul style="list-style-type: none"> <li>• Children</li> <li>• Older people</li> <li>• Disabled people</li> </ul>	Opportunity	<p>Residents at a public event raised the importance of ensuring all parking would be replaced following redevelopment.</p> <p>In a residents feedback event held in December 2021, residents again stressed the need to continue to be able to park on the estate; and ensure that parking is available throughout construction.</p>
<p><b>Improved public realm and green space:</b> Renewal offers an opportunity to improve the public realm. The ability to access and use the public realm is vitally important to ensuring people feel that they are active members of their society. This includes basic activities such as using local shops or meeting up with people in a shared space outside close to home. In addition, the opening up of green space has been shown to impact positively on both physical and mental health. Inner-city green space can promote social cohesion and instil a sense of community. Social contact is especially important for the health and wellbeing of older people. Green space can also have a positive role in a child's cognitive development, their wellbeing, and is linked to lower BMIs. Access to green space has also been shown to have positive health benefits for disabled people, and people with autism or learning difficulties in particular.</p>	<ul style="list-style-type: none"> <li>• Older people</li> <li>• Children</li> <li>• People from ethnic minority backgrounds</li> <li>• Disabled people</li> </ul>	Opportunity	<p>A poll of residents in attendance at an online engagement event undertaken in November 2020, a majority of attendees identified green space provision as an important area they would consider whilst making their decision about the future of the Estate.</p> <p>In a residents feedback event held in December 2021, residents noted that the landscaping around Manor Grove should also be improved. Residents liked the plans for rain gardens, sensory gardens and outdoor seating in the green space. Residents also</p>

## Effects on residents during the renewal process

	Affected groups	Risk or opportunity	Key resident feedback
<p><b>Provision of community resources and improved social cohesion:</b> Community resources provide important places of social connection and promote wellbeing for many groups. For example, community hubs can provide an accessible centre point for local activities, services and facilities. They allow for a cross section of the community to be brought together in a safe place, allowing for better social cohesion and helping to address social isolation.</p> <p>An opportunity to socialise can have a positive effect on the loneliness of older people and disabled people, which may in turn provide positive health benefits. Social contact and out-of-classroom learning can also improve the wellbeing of children</p>	<ul style="list-style-type: none"> <li>• Children</li> <li>• Older people</li> <li>• Disabled people</li> <li>• People from ethnic minority backgrounds</li> <li>• Pregnant women</li> <li>• LGBT people</li> </ul>	Opportunity	<p>liked that there would be different types of play spaces located around the estate.</p> <p>Tustin Estate residents noted they would like to see improved amenities for children and young people.</p>
<p><b>New employment opportunities:</b> Renewal can act as a means of promoting economic growth and supporting job creation. For example, property development can contribute to urban economic regeneration by enabling local stores to grow and expand, and through attracting investment to the area and revitalising neighbourhoods. It can also facilitate improved connectivity between communities and places of employment and education. Improved opportunities to access employment and education can serve to help address issues of inequality and improve social mobility.</p>	<ul style="list-style-type: none"> <li>• Older people</li> <li>• Disabled people</li> <li>• People from ethnic minority backgrounds</li> <li>• Women</li> <li>• Young people</li> </ul>	Opportunity	Residents at a public event asked about employment opportunities that would come from the redevelopment process.
<p><b>Improved housing provision:</b> Renewal can lead to improvements in housing provision within the regeneration area therefore improving appropriateness, accessibility and affordability, as well as its quality and efficiency in energy consumption.</p> <p>Warm and insulated homes can help prevent against the health and wellbeing impacts of living in a cold home. Children living in cold homes are more than twice as likely to suffer from a variety of respiratory problems than children living in warm homes. Cold housing can negatively affect children's educational attainment, emotional wellbeing and resilience. Effects of cold housing are also evident among older people in terms of higher mortality risk, physical health and mental health.</p>	<ul style="list-style-type: none"> <li>• Children</li> <li>• Older people</li> <li>• Disabled people</li> <li>• People from ethnic minority backgrounds</li> </ul>	Opportunity	<p>Tustin Estate residents felt that the rebuild option for the Estate was beneficial because they would provide larger homes with newer amenities</p> <p>Residents wanted to hear about how the different options will address the current accessibility issues of the existing homes, as existing homes do not have appropriate space for those with mobility difficulties.</p> <p>A poll of residents in attendance at an online engagement event undertaken in November 2020, some attendees identified that they believed the Yes option would lead to better living conditions on the Estate.</p> <p>In an Estate walkaround in August 2021, residents fed back that more storage provision in the new homes would be beneficial.</p> <p>In a residents feedback event held in December 2021, residents stressed the importance of providing enough daylight in the new homes, with windows on both sides. Residents wanted confirmation regarding the wheelchair accessibility of homes.</p>



## 4 Area profile and proportionality

This chapter is split into three sections: providing an overview of the socio-demographic profile of the Estate (the study area outlined in Chapter 2), and an overview of community resources businesses on the Estate.

### 2.2 Overview of the socio-demographic profile of the area

The area profile summary below provides a demographic characterisation of the area in which Tustin Estate falls. The baseline compares the socio-demographic profile of the Estate with the London Borough of Southwark, the Greater London region, and England. The summary includes analysis of protected characteristic groups under the Equality Act 2010 and the current socio-economic context of the area. In comparing these regions, where the Estate deviates by more than 3%, the difference is considered to be significant and is reported as such.

The data used in the baseline is the most current publicly available data from the Office of National Statistics. Where there are higher proportions of certain groups on the Estate, this is written in **bold text**.

A more detailed breakdown of the baseline can be found in Appendix A.

**Table 4.1: Socio-demographic baseline**

Protected Characteristic	Estate comparison with Southwark, Greater London and England <sup>4</sup>
<b>Age</b>	<ul style="list-style-type: none"> <li>Population of children (under 16) is consistent with other areas.<sup>5</sup></li> <li>Population of young people (16-24) is consistent with other areas.</li> <li><b>Population of working age people (16-64) living on the Estate (71%) is broadly in line with that of Southwark (73%) but higher than Greater London and England (67% and 62% respectively).</b></li> <li>Population of older people (65+) is consistent with other areas.</li> </ul>
<b>Disability<sup>6</sup>:</b>	<ul style="list-style-type: none"> <li><b>The population of disabled people living on the Estate is higher (16%) than Southwark or Greater London (14%), but in line with England (18%).</b></li> </ul>
<b>Gender reassignment</b>	<ul style="list-style-type: none"> <li>No information is publicly available for the Estate</li> </ul>
<b>Marriage and civil partnerships</b>	<ul style="list-style-type: none"> <li>Population of those who are married or in a civil partnership is lower than or consistent with other areas.</li> </ul>
<b>Pregnancy and maternity</b>	<ul style="list-style-type: none"> <li>The general fertility rate (live births per 1000 women aged 16-44) and total fertility rate (avg. number of children born per woman) is lower than other areas; number of live births as a proportion of the total population is consistent with other areas.</li> </ul>
<b>Race</b>	<ul style="list-style-type: none"> <li><b>76% of people who live on the Estate are from an ethnic minority background. This is significantly higher than the proportion of people from an ethnic minority background who live in Southwark (60%), Greater London (55%) and England (20%).</b> <ul style="list-style-type: none"> <li><b>The largest ethnic minority group on the Estate are those from a Black African background (28%). This is significantly higher than the proportion in Southwark (16%), Greater London (7%), and England (2%).</b></li> </ul> </li> <li>All other ethnic minority groups on the Estate are consistent with other areas</li> <li>There are lower proportions of White British people when compared to other areas.</li> </ul>
<b>Religion</b>	<ul style="list-style-type: none"> <li><b>59% of people who live on the Estate identify as Christian. This is higher than the Christian population in Southwark (53%) and Greater London (59%).</b></li> <li>Populations of people from other religious and faith groups are consistent with other areas.</li> </ul>
<b>Sex</b>	<ul style="list-style-type: none"> <li>The population of men and women is consistent with other areas.</li> </ul>
<b>Sexual orientation</b>	<ul style="list-style-type: none"> <li>No information is publicly available for the Estate</li> </ul>

Source: Office for National Statistics data

<sup>4</sup> To determine the population within the Estate code point data was used. Code point data is a point representing a postcode area (there are multiple within the Estate boundary). Each code point is assigned with Lower Super Output Area (LSOA) data from the LSOA that the point falls in. An LSOA is the smallest geographical area (an average of 1,500 residents and 650 households) for which most population data is published (beyond Census data).

<sup>5</sup> When comparing populations between areas, where the Estate differs by more than 3%, the difference is considered to be significant and is reported this way – e.g. <3% is consistent with other areas and >3% is higher or lower than other areas.

<sup>6</sup> Defined here as 'People whose day to day activities are limited in any way as a result of being disabled or because of a long-term health condition'

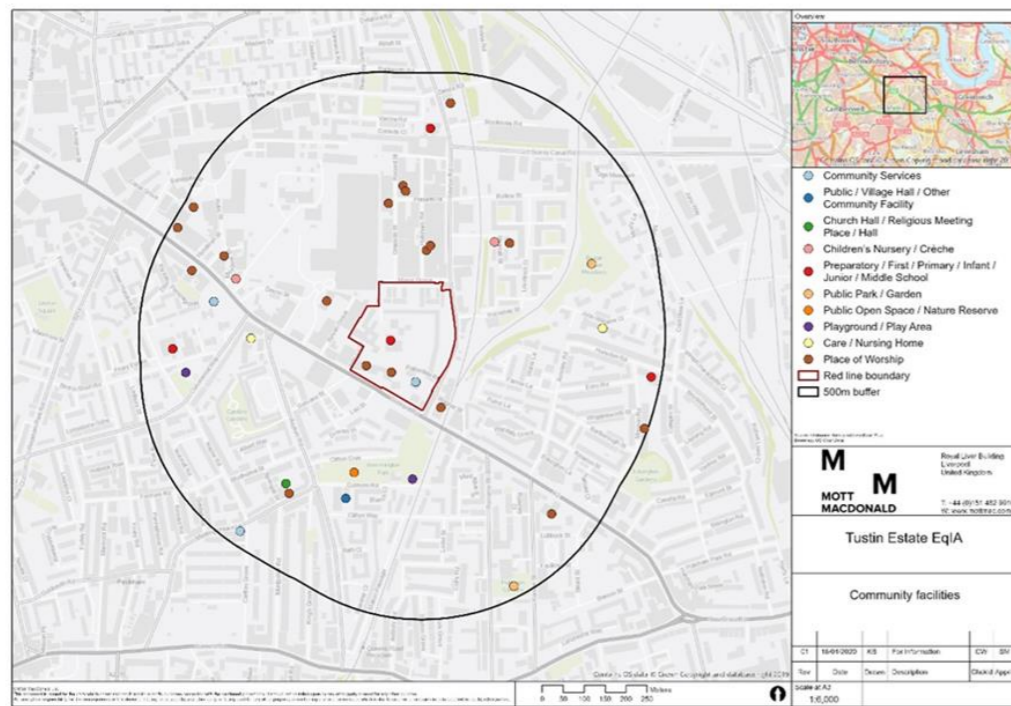
### 2.3 Overview of community resources within the Estate

There are a number of community facilities and resources located both within, and in close proximity to, Tustin Estate which are likely to be accessed by protected characteristic groups, or if they were to be lost, would potentially adversely affect protected characteristic groups. Within the Estate boundary, there are two Christian faith groups which are likely to be affected by the project. Children are likely to be impacted by relocation of the Pilgrims Way Primary School and day care / learning centre. There is also the Tustin Estate Community Centre, which is available for use by all residents of the current Estate. Table 4.2 below lists the community facilities located within the Estate boundary.

**Table 4.2: List of community facilities within the Estate**

Name	Category	Address
Day care / learning centre	Education	803 Old Kent Road
Pilgrims Way Primary School and Nursery	Infant School	Manor Grove
Tustin Community Centre	Community Services	Windermere Point
Divine Prophetic Interdenominational Ministries	Faith group	801 Old Kent Road
Redeemed Assemblies	Faith group	821 Old Kent Road

**Map 4.1: Community facilities within and surrounding the Estate**



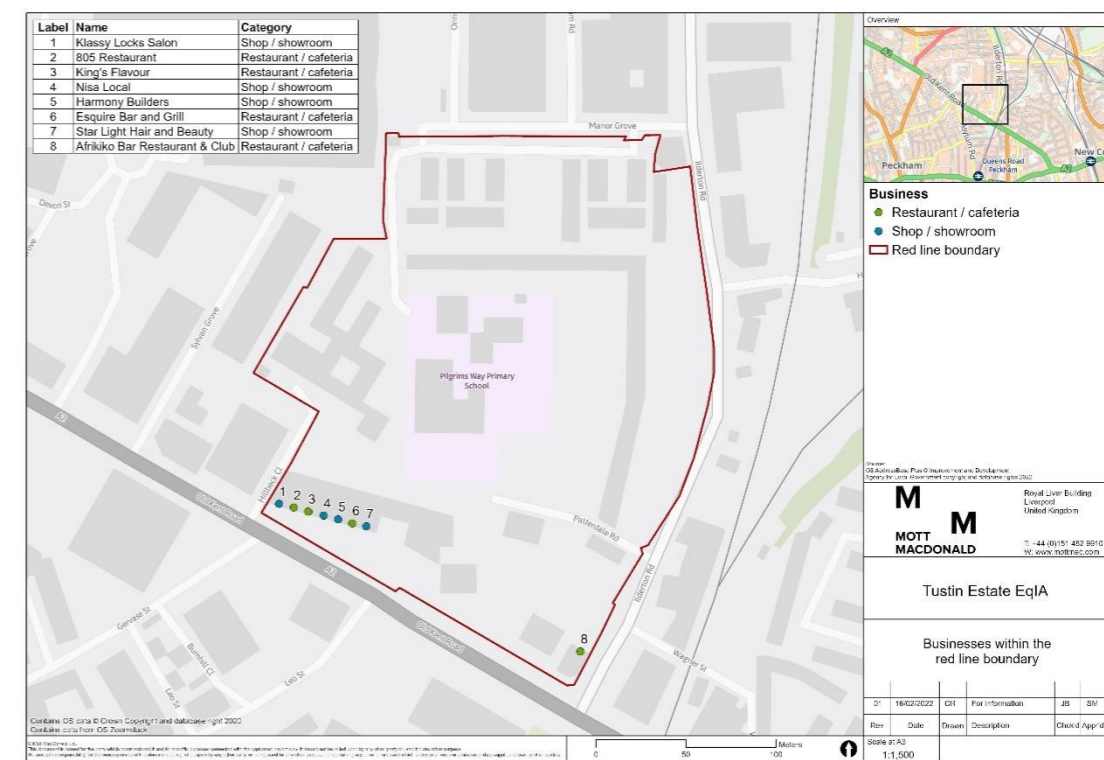
Source: OS AddressBase

### 2.4 Overview of businesses within the Estate

There are a number of commercial units located on the Estate facing Old Kent Road in Bowness House. The businesses include two restaurants, a takeaway, a convenience store, an accountancy and a hair and beauty salon. These may be affected by any demolition and rebuild option on the Estate, which could have equality impacts on owners and employees, and potentially local residents.

Map 4.2 maps and labels the businesses located within the Estate boundary.

**Map 4.2: Businesses within the Estate**



Source: OS AddressBase



## 5 Equality and health impacts

This chapter sets out the potential impacts of the renewal option on protected characteristic groups and outlines existing Southwark Council mitigation measures. The impacts split into three sections: Table 5.1 outlines the impact on residents and community resources during renewal, Table 5.2 outlines the impact on businesses during renewal, and Table 5.3 outlines the impact on communities after the renewal process is complete.

### 5.1 Impact on residents and community resources during renewal

The following table describes the potential impacts of the renewal option on protected characteristic groups, with a focus on impacts for residents and local community resources during the renewal process. These impacts have been identified through a review of published literature and through engagement with residents. Potential disproportionate effects on particular groups based on the demographic analysis of the Estate are also identified. Finally, existing measures Southwark Council has in place to mitigate or enhance impacts are set out.

**Table 5.1: Impact on residents and community resources during renewal**

Potential equality and health risks	Affected groups <sup>7</sup>	Impact	Existing Southwark Council mitigations or enhancements
<p><b>Loss of social cohesion and access to community resources</b></p> <p>The renewal process can involve temporary or permanent resettlement of residents and demolition of housing and community resources. This could lead to the risk of loss of social infrastructure and temporary or permanent access to this amenity provision. In particular, it can increase residents' distances from facilities or places of social connection located on or in close proximity to their neighbourhood. For example, relocation accompanied by a school move has the potential to be particularly stressful and disruptive to children. In addition, older people can experience feelings of isolation from relocation if long-standing community links are broken and older people are already more likely to experience feelings of isolation compared to other groups within society.</p>	<ul style="list-style-type: none"> <li>Children</li> <li>Older people</li> <li><b>Disabled people</b></li> <li>Pregnancy and maternity</li> <li><b>Ethnic minority groups</b></li> <li>Minority faith groups</li> </ul>	<p><b>Neutral</b></p> <ul style="list-style-type: none"> <li>No change in social cohesion as residents able to remain on Estate during renewal</li> </ul> <p><b>Risks</b></p> <ul style="list-style-type: none"> <li>Temporary loss of play area.</li> <li>Reduced access to community facilities and social infrastructure during construction due to temporary loss of resources (e.g. churches).</li> </ul>	<ul style="list-style-type: none"> <li>A community led gardening project was developed prior to the renewal process and will be continued throughout, promoting social cohesion and minimising social isolation, which has been exacerbated by COVID 19 restrictions.</li> <li>Where demolition is taking place, residents have the option to remain on the Estate during construction and continue to access their social networks and community resources, such as the TRA hall (subject to COVID-19 restrictions). There are a series of housing solutions to enable residents to remain on Estate if a temporary move is needed.</li> <li>Pilgrim's Way school will remain open during the renewal process, so there will be no requirement for pupils to change schools while the new school is being built.</li> <li>A phasing plan has been developed to limit the number of temporary moves to a maximum of two, with residents only making one move in most circumstances.</li> <li>Public realm works to be staggered to ensure there is always access to green and recreational space.</li> <li>Temporary amenity space will be provided throughout the redevelopment process.</li> <li>Dedicated resident support continues to be available online and in person where needed, and has also been available throughout the COVID-19 pandemic.</li> </ul>
<p><b>Difficulty accessing finance (e.g. costs associated with moving home)</b></p> <p>Although the renewal process can often increase the value of properties it can also reduce the affordability of housing in the area and contribute to financial exclusion. This means that some groups of people within society are not able to purchase a renewed home as they are unable to get the required mortgage or loan. In addition, where renewal requires residents to relocate, it can lead to an increase in their financial outgoings due to costs associated with moving and securing new housing. Relocation costs could include removal services, the need to adapt a new home or buy new furniture.</p>	<ul style="list-style-type: none"> <li>Young people</li> <li>Older people</li> <li><b>Disabled people</b></li> <li><b>Ethnic minority groups</b></li> <li>Women</li> </ul>	<p><b>Opportunity</b></p> <ul style="list-style-type: none"> <li>Possible lower service charges for resident leaseholders after renewal</li> <li>Homes connected to the new district heating system and built to new building standards may have lower energy bills</li> </ul> <p><b>Risks</b></p> <ul style="list-style-type: none"> <li>Costs associated with resettlement such as securing new accommodation and moving home.</li> <li>Financial implications associated with new build option for freeholders.</li> </ul>	<ul style="list-style-type: none"> <li>Homeowners will be offered the market value of their home.</li> <li>Should a residents home require demolition, a Home Loss Payment (sum in recognition of home loss) and a Disturbance Payment would be made to Council tenants and homeowners. The Home Loss Payment would be a one-time payment, whilst the Disturbance Payment may be made more than once where necessary to facilitate multiple moves. This includes reimbursement of funds for removals, disconnection and reconnection of cooker/washing machine, redirection of mail, BT Telephone Installation, cable TV/TV installation and reasonable adjustments to carpets and curtains.</li> <li>A number of options are available to leaseholders on the site, including shared ownership, an equity loan, and shared equity options. For leaseholders who cannot meet the equity requirements for these, council tenancies will be available, subject to financial appraisal.</li> <li>Leaseholders and freeholders will have access to an independent chartered surveyor to carry out a market evaluation of the properties and discuss this with the council surveyors.</li> </ul>

<sup>7</sup> Groups that have been highlighted in bold, blue text are also disproportionately represented in the study area.

- New build Council rents in line with new homes across Southwark.
- Council tax may increase for those in new homes.
- Service charges may increase for council tenants
- Southwark Council commitment to work with leaseholders and freeholders to ensure that no household is worse off as a result of renewal.
- Additional costs for freeholders resulting from the works to the wider estate as well as costs related to services and utilities will be set out in detail as the earliest opportunity.
- Council tenants will receive information regarding the indicative rent and council tax of each property size before the selection process.
- Resident leaseholders who wish to remain on the Estate will be able to choose their home once planning permission has been obtained, and will be provided with information on the cost and council tax band of the properties.
- Support will be provided to help residents deal with utility companies and any change in benefit claims

### Appropriate, accessible and affordable housing

Where renewal schemes require the resettlement of many residents, issues can arise regarding sourcing suitable housing that meets the needs of families with children, people requiring adaptable and accessible housing, people seeking affordable housing and large intergenerational ethnic minority households.

- Children
- Older people
- **Disabled people**
- **Ethnic minority groups**

#### Risks

- Challenge finding appropriate temporary housing for those with specific housing needs (e.g. disabled people, families with children)

- Residents will be supported to access homes that meet their needs and preferences.
- All council residents whose homes will be demolished will be offered a like- for- like replacement home on the new Estate
- 10% of new build housing to be wheelchair accessible, in line with national government requirements.
- All tenanted homes will be adapted for residents' needs as required.
- Those with special housing needs to be prioritised through rehousing process.
- All new and refurbished social rented homes will be owned and managed by Southwark Council. They will all have Council rent levels.
- A mix of housing sizes and typologies will be available in the redevelopment, to provide for different housing needs.
- All new homes will have access to a balcony, patio, or roof terrace.
- A variety of tenures will be available to allow homeowners to stay on the estate including shared equity and rehousing as a Council tenant.
- Tenants who are overcrowded in the low rise blocks will be offered new accommodation to meet their housing needs.
- New housing block built specifically for older people who are not living with children.
- All new and refurbished social rented homes will be owned and managed by Southwark Council. They will all have Council rent levels.
- 13 new 'Hidden Homes' built within the high rise towers to accommodate low rise Tustin residents.

### Health effects

Health effects may arise as a result of stress due to relocation, the environmental effects of demolition and construction processes and/or as a result from social isolation due to housing relocation.

- Children
- Older people
- **Disabled people**
- Pregnancy and maternity

#### Risks

- Noise exposure from demolition and construction.
- Poorer air quality from demolition and construction.
- Health effects associated with rehousing (stress, isolation).
- Impacts of noise and air pollution on school pupils and their learning during construction.

- Potential health impacts related to stress due to relocation would be mitigated through rehousing support outlined above. There will also be a dedicated team in place to help with questions or information throughout the process.
- Housing solutions to enable residents to remain on Estate if they need to move temporarily, where possible.
- Public realm works to be staggered to ensure there is always access to green and recreational space.
- Pilgrims Way Primary School will retain access to their play space until completion of the new school playground.
- Temporary amenity space will be provided throughout the redevelopment process.
- New communal outdoor space to mitigate health impacts of social isolation, which may have been exacerbated as a result of the COVID- 19 pandemic.
- Environmental effects to be mitigated through considerate construction practices and environmental management planning.

### Safety and security

In the lead up to renewal, and during the decanting and demolition of properties in the area, properties will be vacated. If these are not maintained properly there is a risk that they could fall into disrepair. This could attract unwanted activity including anti-social behaviour and

- Children
- Young people
- Older people

#### Risks

- Potential for anti-social behaviour and vandalism during decanting and demolition period.

- Properties to be secured through appropriate measures, including phasing of redevelopment so the Estate is not left vacant.
- 'One move approach' to relocation of residents will ensure the Estate remains occupied during the construction period.

<p>crime, which can affect those who are more likely to be a victim or witness of crime or those who are more fearful of crime.</p>	<ul style="list-style-type: none"> <li>• Disabled people</li> <li>• Ethnic minority groups</li> <li>• LGBT</li> <li>• Men</li> <li>• Women</li> </ul>
<p><b>Accessibility and mobility in the surrounding area</b>                  Evidence suggests that during construction the accessibility and mobility of the local area can be affected. In particular, construction can cause difficulties in relation to increased traffic on local roads, reducing parking (as construction vehicles may use existing parking facilities), the construction activities blocking access to homes, shops, bus stops and pavements and safe routes, as well as effects on wayfinding.</p>	<ul style="list-style-type: none"> <li>• Older people <b>Risks</b></li> <li>• Disabled people                         <ul style="list-style-type: none"> <li>• The presence of tradesmen’s vehicles and construction vehicles during refurbishment may temporarily reduce access and parking.</li> <li>• The presence of more vehicles in the area may increase local traffic.</li> <li>• Potential for construction activities might block some access routes and could impact on wayfinding.</li> </ul> </li> </ul> <ul style="list-style-type: none"> <li>• Resident car owners who currently have a parking permit will be re- provided with a parking permit for the redeveloped estate. Blue badge parking permits will also be re-provided.</li> <li>• The existing five disabled parking bays will be re-provided in the new Estate, with an additional provision of 16 (reflecting 3% of the total new homes on the Estate)</li> <li>• Accessibility of Estate to be considered through construction planning (e.g. ensuring hoarding does not sever the Estate).</li> </ul>
<p><b>Information and communication</b>                  Complex material and information on the regeneration may present a challenge to those who have different information and communication needs.</p>	<ul style="list-style-type: none"> <li>• Older people <b>Risks</b></li> <li>• Disabled people</li> <li>• Ethnic minority groups</li> </ul> <ul style="list-style-type: none"> <li>• Residents will need to spend time understanding the option available to them in order to make an informed decision.</li> </ul> <ul style="list-style-type: none"> <li>• Southwark Council will fund independent resident advice which will include training and support in design and construction stages to ensure that residents can meaningfully engage in decision making.</li> <li>• Series of face to face and online meetings held with residents to discuss issues and concerns of residents.</li> <li>• A dedicated Tustin team of housing officers will be established to liaise with residents throughout the development.</li> <li>• Information is published online as it is made available for all to access.</li> <li>• Language interpretation and face to face engagement available.</li> <li>• Additional support will be provided where required due to a language barrier or literacy needs.</li> <li>• Support will be provided to help residents deal with utility companies and any change in benefit claims.</li> </ul>

**5.2 Impact on businesses during renewal**

The following table describes the potential impacts of the renewal option on protected characteristic groups, with a focus on the businesses on Tustin Estate during the renewal process. These impacts have been identified through a review of published literature and through engagement with residents. Potential disproportionate effects on particular groups based on the demographic analysis of the Estate are also identified. Finally, existing measures Southwark Council has in place to mitigate or enhance impacts are set out.

Table 5.2: Impact on businesses during renewal

Potential equality and health risks	Affected groups <sup>8</sup>	Impact	Existing Southwark Council Mitigations or enhancements
<p><b>Potential redundancy of employees associated with business loss or relocation</b></p> <p>The renewal process may result in the closure and relocation of businesses. These changes may result in business owners becoming unemployed, redundancies or in current staff being unable to access ongoing employment at a different location. Older people, disabled people and minority ethnic people may particularly be at risk if faced with redundancy and/or extended periods of unemployment due to typically facing additional barriers in securing interviews and offers of new employment. In addition, older people are more likely to be self-employed, meaning that they could face further barriers in finding new roles in the labour market. Closure or relocation may affect the customer base and net revenue of businesses, resulting in restructuring and redundancy of staff as a result.</p>	<ul style="list-style-type: none"> <li>Older people</li> <li>Disabled people</li> <li>Ethnic minority groups</li> <li>Young people</li> <li>Women</li> </ul>	<p><b>Risk</b></p> <ul style="list-style-type: none"> <li>Relocation options for businesses on an interim or permanent basis may result in current staff not being able to access work.</li> </ul>	<ul style="list-style-type: none"> <li>Relocation options to be discussed with businesses on a case by case basis. Options will include a permanent move to a property nearby, or a temporary relocation nearby with a permanent return to the Estate after Phase 4 in autumn 2029.</li> <li>Signposting to employment through Southwark Works. Dedicated business support available.</li> <li>Demolition of the commercial plots to take place in Phase 4 to maintain the commercial use by businesses for as long as possible.</li> </ul>
<p><b>Potential loss of businesses</b></p> <p>The renewal process may result in the closure and relocation of businesses. Research evidence shows that minority ethnic people are more likely to be self-employed and twice as likely to be in precarious work conditions than their White British counterparts in the UK. In addition, older people are also more likely to be self-employed, representing one in five self-employed population in the UK, placing them at potentially greater risk where businesses are affected.</p>	<ul style="list-style-type: none"> <li>Older people</li> <li>Ethnic minority groups</li> </ul>	<p><b>Risk</b></p> <ul style="list-style-type: none"> <li>Renewal process may result in the permanent closure of businesses due to impacts to trading and customer base.</li> </ul>	<ul style="list-style-type: none"> <li>Relocation options to be discussed with businesses on a case by case basis- options will include a permanent move to a property nearby, or a temporary relocation nearby with a permanent return to the Estate.</li> <li>Demolition of the commercial plots to take place in Phase 4 to maintain the commercial use by businesses for as long as possible.</li> <li>Dedicated business support available. Relocation fund to be made available where appropriate.</li> </ul>
<p><b>Access to commercial finance</b></p> <p>For businesses, redevelopment and renewal may result in effects on trade, relocation or closure. This may result in a need to access finance, which can be more difficult for particular groups.</p>	<ul style="list-style-type: none"> <li>Ethnic minority groups</li> </ul>	<p><b>Risk</b></p> <ul style="list-style-type: none"> <li>Potential costs from disruption to business trading.</li> <li>Cost of relocation and securing new premises, either on a temporary or permanent basis.</li> </ul>	<ul style="list-style-type: none"> <li>Relocation options to be discussed with businesses on a case-by-case basis. Options will include a permanent move to a property nearby, or a temporary relocation nearby with a permanent return to the Estate.</li> <li>Dedicated business support available. Relocation fund to be made available where appropriate.</li> <li>Signposting to employment through Southwark Works. Dedicated business support available.</li> </ul>
<p><b>Impact of redundancy on health and well-being</b></p> <p>Involuntary job loss due to redevelopment and renewal can have disproportionate health and well-being effects for families with children and older people.</p>	<ul style="list-style-type: none"> <li>Children</li> <li>Older people</li> </ul>	<p><b>Risk</b></p> <ul style="list-style-type: none"> <li>Relocation may cause businesses to close and staff to be made redundant.</li> </ul>	<ul style="list-style-type: none"> <li>Relocation options to be discussed with businesses on a case-by-case basis. Options will include a permanent move to a property nearby, or a temporary relocation nearby with a permanent return to the Estate.</li> <li>Demolition of the commercial plots to take place in Phase 4 to maintain the commercial use by businesses for as long as possible.</li> <li>Signposting to employment through Southwark Works. Dedicated business support available.</li> </ul>
<p><b>Impacts on local customers</b></p> <p>Potential closure or relocation of businesses could reduce the availability of services in the local area. Research evidence suggests that certain groups, such as <b>older people, disabled people</b> and <b>minority ethnic groups</b> may be more reliant on existing networks and links to shops and commercial services. As a result, sudden changes in locations of businesses could reduce their access to services and lead to social isolation and negative mental health outcomes.</p>	<ul style="list-style-type: none"> <li>Older people</li> <li>Disabled people</li> <li>Ethnic minority groups</li> </ul>	<p><b>Risk</b></p> <ul style="list-style-type: none"> <li>Relocation or closure of businesses may impact upon local customers who are reliant on them for goods, services, or social interaction.</li> </ul>	<ul style="list-style-type: none"> <li>Relocation options to be discussed with businesses on a case by case basis- options will include a permanent move to a property nearby, or a temporary relocation nearby with a permanent return to the Estate. Once businesses enter into these discussions, they will be able to proactively communicate the plan with their customer base.</li> <li>Demolition of the commercial plots to take place in Phase 4 to maintain the commercial use by businesses for as long as possible.</li> </ul>

<sup>8</sup> Estate demographic information does not apply to businesses therefore no Groups that have been highlighted in bold, blue text are also disproportionately represented in the study area

### 5.3 Impact on community following renewal process

The following table describes the potential impacts of the renewal option on protected characteristic groups, with a focus on the Estate and wider community following the renewal process. These impacts have been identified through a review of published literature and through engagement with residents. Potential disproportionate effects on particular groups based on the demographic analysis of the Estate are also identified. Finally, existing measures Southwark Council has in place to mitigate or enhance impacts are set out.

**Table 5.3: Impact on community following renewal process**

Potential equality and health opportunities	Affected groups <sup>9</sup>	Impact of Redevelopment
<p><b>Tackling crime and disorder</b></p> <p>Levels of crime can be in part been attributed to the urban environment. It has been argued that the opportunity for some forms of crime can be reduced through well thought-out approaches to planning, and the design of neighbourhoods and towns. Reducing potential for crime can affect those more likely to fear crime or be a victim or witness of crime.</p>	<ul style="list-style-type: none"> <li>• Children</li> <li>• Young people</li> <li>• Older people</li> <li>• <b>Disabled people</b> <ul style="list-style-type: none"> <li>• <b>Ethnic minority groups</b></li> </ul> </li> <li>• LGBT</li> <li>• Men</li> <li>• Women</li> </ul>	<p><b>Opportunity</b></p> <ul style="list-style-type: none"> <li>• Better external lighting for safety and visibility.</li> <li>• Clearer and more secure routes for people passing through the estate</li> <li>• Estate to promote safety and security through new design.</li> <li>• Paths and green spaces overlooked by houses to create feeling of safety.</li> <li>• Designed to Secured by Design Standards.</li> </ul>
<p><b>Improved access, mobility and navigation</b></p> <p>Renewal processes open up opportunities to create spaces and places that can be accessed and effectively used by all, regardless of age or disability, using principles of inclusive design. There are a number of equality groups who can experience difficulties with access, mobility and navigation who could benefit from improvements in this area.</p>	<ul style="list-style-type: none"> <li>• Children</li> <li>• Older people</li> <li>• <b>Disabled people</b></li> </ul>	<p><b>Opportunity</b></p> <ul style="list-style-type: none"> <li>• Better external lighting for safety and visibility.</li> <li>• Clearer and more secure routes for people passing through the estate.</li> <li>• New estate priorities pedestrians, with clear separate pedestrian routes and new access to existing routes</li> <li>• Improved signage for wayfinding</li> <li>• Secure and controlled parking.</li> <li>• New benches.</li> </ul>
<p><b>Improved public realm and green space</b></p> <p>Renewal offers an opportunity to improve the public realm. The ability to access and use the public realm is vitally important to ensuring people feel that they are active members of their community. This includes basic activities such as using local shops or meeting up with people in a shared space outside close to home. In addition, the opening up of green space has been shown to impact positively on both physical and mental health.</p>	<ul style="list-style-type: none"> <li>• Children</li> <li>• Older people</li> <li>• <b>Disabled people</b> <ul style="list-style-type: none"> <li>• <b>Ethnic minority groups</b></li> </ul> </li> </ul>	<p><b>Opportunity</b></p> <ul style="list-style-type: none"> <li>• Enhanced and enlarged green space at heart of estate, promoting health and wellbeing for different equality groups.</li> <li>• New network of green spaces across the development</li> <li>• New active space within 'Tustin Common', with play areas and seating</li> <li>• Enhanced bicycle storage provision to facilitate active travel, promoting healthier lifestyles.</li> <li>• Electric charging points for vehicles.</li> <li>• New communal outdoor space in blocks.</li> </ul>

<sup>9</sup> Groups that have been highlighted in bold, blue text are also disproportionately represented in the study area

### Provision of community resources and improved social cohesion

Community resources provide important places of social connection and promote wellbeing for many groups. For example, community hubs can provide an accessible centre point for local activities, services and facilities. They allow for a cross section of the community to be brought together in a safe place, allowing for better social cohesion and helping to address social isolation.

- Children
- Older people
- **Disabled people**
  - **Ethnic minority groups**
- Pregnancy and maternity
- LGBT

### Opportunity

- A mix of shared communal spaces in new blocks.
- Increased access to community resources such as the community garden.
- Possibility of tenants managing community spaces.
- New school building at the heart of the estate with space for outdoor learning to improve health and wellbeing
- New church premises on Estate.
- New outdoor communal space in blocks, and new park area, to improve social cohesion and reduce isolation after the COVID- 19 pandemic.
- Separate and dedicated amenity space for residents of the Over 55 homes.

### Risk

- New community moving on to Estate and effects on social cohesion<sup>10</sup>

### New employment opportunities

Renewal can act as a means of promoting economic growth and supporting job creation. For example, property development can contribute to urban economic regeneration by enabling local stores to grow and expand, and through attracting investment to the area and revitalising neighbourhoods. It can also facilitate improved connectivity between communities and places of employment and education. Improved opportunities to access employment and education can serve to help address issues of inequality and improve social mobility.

- Young people
- Older people
- **Disabled people**
  - **Ethnic minority groups**
- Women

### Opportunity

- Improved commercial spaces for existing businesses.
- Construction employment onsite (varying by the amount of construction required for the job).
- Increased commercial space on site for new businesses

### Improved housing provision

Renewal can lead to improvements in housing provision within the regeneration area, thereby improving suitability, accessibility and affordability, as well as its quality and efficiency in energy consumption.

- Children
- Older people
- **Disabled people**
  - **Ethnic minority groups**

### Opportunity

- All new homes built to new building, space and accessibility standards.
- Potential health effects of overcrowding are addressed.
- Private external space for every home (garden, patio or balcony) to capture health benefits of access to outdoor space.
- New homes designed to maximise natural daylight and views
- Energy efficiency improvements to address potential health effects of cold housing.
- Mixture of shared and private external space in blocks .
- Housing to suit different needs, including family homes
- Large uplift in new homes.
- Dedicated housing for the over 55s with separate amenity space
- All new homes will meet the Wheelchair User Dwelling Standards, and 10% will meet the Adaptable Dwellings Standard.
- All tenanted homes will be adapted for residents needs as required.

### Neutral

- Where relevant, new tenancy agreements will be drawn up.
- Where relevant, leaseholder deeds will change in line with changing ownership arrangements.
- No change to status of freeholders on estate.

<sup>10</sup> Risk to be mitigated through phasing strategy and a dedicated support team to help integrate residents into new community.

## 6 Overall equality and health effects

This section identifies the potential impacts that could arise for people with protected characteristics, as a result of the redevelopment of the Estate. It shows the potential impact of risks and opportunities without mitigation, following mitigation and then highlights the likely overall equality effect if recommendations are adhered to.

### 6.1 Overview: assessing equality risks and opportunities

The scale below has been used to identify the extent of both risks and opportunities. Where there is more than one impact, the rating summarises the overall impact. Please note that the rating following mitigation captures where there may be possible further mitigation measures that could be put in place by the Council to further reduce the effect, or the impact has been reduced for identified protected characteristic groups to a level that is no worse than that experienced by the rest of the population.

Major risk	XXX
Moderate risk	XX
Minor risk	X
Neutral	0
Minor opportunity	✓
Moderate opportunity	✓✓
Major opportunity	✓✓✓

### 6.2 Risks and opportunities during renewal

Tables 6.1 and 6.2 identify the potential impacts on residents, community resources and businesses located within the low-rise blocks on the Estate during the renewal process, for the period between a successful ballot up to completed delivery. It shows the potential impact of risks and opportunities without mitigation, following mitigation measures that have been put in place by Southwark Council and then highlights the likely overall equality effect if Southwark Council adhere to the recommendations.

**Table 6.1: Impact on residents and community resources during renewal (from the ballot up to delivery)**

Potential impact	Without mitigation	With mitigation	Recommendations	Overall equality and health effect
<p><b>Loss of social cohesion and access to community resources</b></p> <p>The renewal process can involve temporary or permanent resettlement of residents and demolition of housing and community resources. This could lead to the risk of loss of social infrastructure and temporary or permanent access to this amenity provision.</p>	XXX	X	<ul style="list-style-type: none"> <li>Work proactively and constructively through a range of channels, including face to face engagement where possible with residents, keeping up-to-date records of changing needs and circumstances, particularly if residents who will be most affected by refurbishment and/or redevelopment in order to remediate feelings of social isolation.</li> <li>Maintain continuity in access to community resources (e.g. churches and play areas) where possible. If this is not possible, consider pop-up spaces for these uses.</li> </ul>	<p>There are likely to be no adverse effects on equality groups due to a loss of social cohesion.</p> <p>There may be limited effects on equality groups due to temporarily reduced access to some community resources during the renewal period under the Final Option.</p> <p><b>Overall, this risk is considered to be managed through a range of proportionate measures.</b></p>
<p><b>Difficulty accessing finance (e.g. costs associated with moving home)</b></p> <p>Although the renewal process can often increase the value of properties it can also reduce the affordability of housing in the area and contribute to financial exclusion.</p>	XX	X	<ul style="list-style-type: none"> <li>Work proactively and constructively through a range of channels, including face to face engagement where possible, keeping up-to-date records of changing needs and circumstances— particularly those who are most affected by financial exclusion.</li> <li>Ensure that residents are signposted to the reallocation process (including financial advice) available online or via telephone, if necessary, to comply with COVID- 19 social distancing and self-isolation recommendations.</li> <li>Early estimates of changes to rent and service charges as a result of the vote should be communicated to residents as soon as possible.</li> </ul>	<p>There should be no significant adverse effects on the ability of equality groups to access finance, although there may be some effects linked to increases in rent, council tax, and service charges after renewal.</p> <p><b>Overall, this risk is considered to be managed through a range of proportionate measures.</b></p>
<p><b>Appropriate, accessible and affordable housing</b></p> <p>Where renewal schemes require the resettlement of many residents, issues can arise regarding sourcing suitable housing that meets the needs of families with children, people requiring adaptable and accessible housing, people seeking affordable housing and large intergenerational Ethnic Minority Background households.</p>	XXX	O	<ul style="list-style-type: none"> <li>Work proactively and constructively through a range of channels, including face to face engagement where possible, keeping up-to date records of changing needs and circumstances – particularly those who are most affected by a change to affordable and appropriate housing.</li> <li>Ensure that residents are signposted to the reallocation process (including financial advice) available online or via telephone, if necessary, to comply with COVID- 19 social distancing and self-isolation recommendations.</li> </ul>	<p>There is likely to be no adverse effect on equality groups with relation to access to appropriate, accessible, and affordable housing during the renewal period.</p> <p><b>Overall, this risk is considered to be managed through a range of proportionate measures.</b></p>



Potential impact	Without mitigation	With mitigation	Recommendations	Overall equality and health effect
<p><b>Health effects</b></p> <p>Health effects may arise as a result of stress due to relocation, the environmental effects of demolition and construction processes, including on school pupils, and/or as a result from social isolation due to housing relocation.</p>	XX	X	<ul style="list-style-type: none"> <li>Demolition works should be monitored closely and disruption should be minimised through the creation of a Construction Environmental Management Plan (CEMP), which would be implemented by the contractor carrying out the works, in order to address health impacts related to noise and air quality.</li> <li>Throughout the improvement works, identify and work with vulnerable people whose protected characteristics may make them more vulnerable to adverse health impacts.</li> <li>Access to communal outdoor space should be maintained during the construction period to limit impacts on health caused by social isolation.</li> </ul>	<p>There may be minor adverse impacts on equality groups during the renewal period due to the noise and air quality impacts of construction during the renewal period; and the potential stress associated with moving home.</p> <p><b>Overall, this risk is considered to be managed through a range of proportionate measures.</b></p>
<p><b>Safety and security</b></p> <p>In the lead up to renewal, and during the decanting and demolition of properties in the area, properties will be vacated. This could attract unwanted activity including anti-social behaviour and crime, which can affect those who are more likely to be a victim or witness of crime or those who are more fearful of crime.</p>	X	O	<ul style="list-style-type: none"> <li>Ensure best practices for enhancing safety and preventing crime are considered throughout the planning and construction process.</li> <li>Ensure a process is in place for reporting and addressing incidents of Anti-Social Behaviour (ASB) within the Estate.</li> <li>Monitor the security of the Estate and consider additional security where concerns are flagged. However, any enhanced security measures should only be implemented as a last resort, if deemed necessary, and in conjunction with residents, as it risks adding to a sense of vulnerability, isolation, and loss of sense of community for residents.</li> </ul>	<p>The impact of safety and security is likely to cause no adverse impacts on equality groups on the estate due to the mitigations and recommendations.</p> <p><b>Overall, this risk is considered to be managed through a range of proportionate measures.</b></p>
<p><b>Accessibility and mobility in the surrounding area</b></p> <p>Evidence suggests that during construction the accessibility and mobility of the local area can be affected. In particular, construction can cause difficulties in relation to increased traffic on local roads, reducing parking (as construction vehicles may use existing parking facilities), the construction activities blocking access to homes, shops, bus stops and pavements and safe routes, as well as effects on wayfinding</p>	XXX	X	<ul style="list-style-type: none"> <li>As with health impacts, good access and mobility would be maintained through the creation of a CEMP, which would set out arrangements for any necessary diversions, which should provide well-signed routes that limit extra travelling distances. The CEMP should also ensure that access is maintained through measures such as such as limiting pavement obstructions and maintaining disabled parking. The CEMP should specifically consider the needs of protected characteristic groups who may have limited mobility.</li> </ul>	<p>There are potential minor impacts on accessibility and mobility which may affect equality groups during the renewal period.</p> <p><b>Overall, this risk is considered to be managed through a range of proportionate measures.</b></p>

Potential impact	Without mitigation	With mitigation	Recommendations	Overall equality and health effect
<p><b>Information and communication</b></p> <p>Complex material and information on the regeneration may present a challenge to those who have different information and communication needs.</p>	X	O	<ul style="list-style-type: none"> <li>• Accessible format consultation materials, including but not limited to, easy read, different community languages, audio, and braille, should be available if requested.</li> <li>• Access to information and communication should be available in a number of formats, including online, telephone and one to one meetings, to ensure that all residents have safe access to information and support services as COVID- 19 restrictions continue.</li> <li>• Information should be provided in a clear and easy to understand way and communicated in a timely manner. This includes keeping website information up to date.</li> <li>• Up-to-date information about the renewal, including what is going on before, during and after all stages of the renewal process should be shared with residents, businesses and community resources. This provides them with the means to understand the options available to them in order to make an informed decision on what they need to do and when.</li> </ul>	<p>There are likely to be no adverse impacts on equality groups due to information and communication during the renewal period.</p> <p><b>Overall, this risk is considered to be managed through a range of proportionate measures.</b></p>

**Table 6.2: Impact on businesses during renewal (from the ballot up to delivery)**

Potential impact	Without mitigation	With Mitigation	Recommendations	Overall Equality and health effect
<p><b>Barriers to reemployment</b></p> <p>The renewal process may result in the closure and relocation of businesses. These changes may result in business owners becoming unemployed, redundancies or in current staff being unable to access ongoing employment at a different location.</p>	XX	X	<ul style="list-style-type: none"> <li>• Offer business development support to existing businesses to ensure they are equipped to maximise the opportunity that the refurbishment and/or redevelopment may bring, such as information on how they might diversify their business.</li> </ul>	<p>There may be some minor adverse effects on equality groups due to barriers to reemployment during renewal.</p> <p><b>Overall, this risk is considered to be largely managed through a range of proportionate measures, however consideration should be given to adding the detail provided in the recommendations to the existing proposed measures.</b></p>

Potential impact	Without mitigation	With Mitigation	Recommendations	Overall Equality and health effect
<p><b>Potential loss of businesses</b></p> <p>The renewal process may result in the closure and relocation of businesses. Research evidence shows that minority ethnic people are more likely to be self-employed and twice as likely to be in precarious work conditions than their White British counterparts in the UK. In addition, older people are also more likely to be self-employed, representing one in five self-employed population in the UK, placing them at potentially greater risk where businesses are affected.</p>	XX	X	<ul style="list-style-type: none"> <li>Work proactively and constructively through a range of channels, including face to face engagement where possible with vulnerable business owners and employees.</li> <li>Offer business development support to existing businesses to ensure they are equipped to maximise the opportunity that the refurbishment and/or redevelopment may bring. This should include engagement with each of the businesses to understand each business model, trading history, relocation requirements and identification of areas for support and diversification.</li> <li>Ensure that a business relocation and support approach is implemented to assist businesses in the relocation process and ensure minimum business disruption and to prevent the loss of business, if the business chooses to relocate permanently.</li> <li>Businesses should qualify for disturbance payments in reflection of the potential impact of the redevelopment on their business.</li> </ul>	<p>There may be some minor adverse effects on equality groups due to potential loss of business.</p> <p><b>Overall, this risk is considered to be largely managed through a range of proportionate measures, however consideration should be given to adding the detail provided in the recommendations to the existing proposed measures.</b></p>
<p><b>Access to commercial finance</b></p> <p>For businesses, redevelopment and renewal may result in effects on trade, relocation or closure. This may result in a need to access finance, which can be more difficult for particular groups.</p>	XX	X	<ul style="list-style-type: none"> <li>Ensure businesses are fully informed of the timescales that would affect them as soon as possible, including when they if and would need to vacate the premises and the period of time they would be inactive for before being able to reopen on the refurbished or redeveloped Estate.</li> <li>Businesses should qualify for disturbance payments in reflection of the potential impact of the redevelopment on their business.</li> </ul>	<p>There may be some minor adverse effects on equality groups due to difficulty accessing commercial finance during renewal.</p> <p><b>Overall, this risk is considered to be largely managed through a range of proportionate measures, however consideration should be given to adding the detail provided in the recommendations to the existing proposed measures.</b></p>
<p><b>Impact of redundancy on health and well-being</b></p> <p>Involuntary job loss due to redevelopment and renewal can have disproportionate health and well-being effects for families with children and older people.</p>	XX	X	<ul style="list-style-type: none"> <li>Work proactively and constructively through a range of channels, including face to face engagement where possible with vulnerable business owners and employees.</li> </ul>	<p>There may be some minor adverse effects on equality groups due to the impact of redundancy on health and wellbeing.</p> <p><b>Overall, this risk is considered to be largely managed through a range of proportionate measures, however consideration should be given to adding the detail provided in the recommendations to the existing proposed measures.</b></p>
<p><b>Impacts on local customers</b></p> <p>Potential closure or relocation of businesses could reduce the availability of services in the local area.</p>	XX	X	<ul style="list-style-type: none"> <li>Work proactively and constructively through a range of channels, including face to face engagement where possible with business owners and employees.</li> </ul>	<p>There may be some minor adverse effects on equality groups due to impacts on local customers.</p>

Potential impact	Without mitigation	With Mitigation	Recommendations	Overall Equality and health effect
				Overall, this risk is considered to be largely managed through a range of proportionate measures, however consideration should be given to adding the detail provided in the recommendations to the existing proposed measures.

### 6.3 Risks and opportunities following renewal

Table 6.3 below identifies the potential impacts on the future Tustin Estate community (residents, community resources and businesses) following the renewal process, following completed delivery. It shows the potential impact of risks and opportunities without mitigation, following mitigation measures that have been put in place by Southwark Council and then highlights the likely overall equality effect if Southwark Council adhere to the recommendations.

**Table 6.3: Impact on the Tustin Estate community following the renewal process**

Potential impact	Without mitigation	With Mitigation	Recommendations	Overall Equality and health effect
<p><b>Tackling crime and disorder</b></p> <p>Levels of crime can be in part been attributed to the urban environment. It has been argued that the opportunity for some forms of crime can be reduced through well thought-out approaches to planning, and the design of neighbourhoods and towns. Reducing potential for crime can affect those more likely to fear crime or be a victim or witness of crime.</p>	✓✓✓	✓✓✓	<ul style="list-style-type: none"> <li>Follow Crime Prevention Through Environmental Design (CPTED) and Secure by Design principles in designing the built environment and public realm.<sup>11</sup></li> </ul>	<p>There is likely to be a major positive impact on equality groups due to the impact on tackling crime and disorder after delivery of the redevelopment programme.</p> <p><b>Overall, this risk is considered to be managed through a range of proportionate measures.</b></p>
<p><b>Improved access, mobility and navigation</b></p> <p>Renewal processes open up opportunities to create spaces and places that can be accessed and effectively used by all, regardless of age or disability, using principles of inclusive design. There are a number of equality groups who can experience difficulties with access, mobility and</p>	✓✓✓	✓✓✓	<ul style="list-style-type: none"> <li>Ensure the design of movement networks and public spaces specifically addresses the mobility needs of vulnerable groups. This can be achieved by applying principles of inclusive design.<sup>12</sup></li> </ul>	<p>There is likely to be a major positive impact on equality groups due to improved access, mobility, and navigation after delivery of the redevelopment programme.</p> <p><b>Overall, this risk is considered to be managed through a range of proportionate measures.</b></p>

<sup>11</sup> Jeffery (1971) 'Crime Prevention Through Environmental Design'. Sage publications

Secured by Design (2014) 'Secured by Design: Reducing crime by good design'. Available at: <https://mbp.co.uk/wp-content/uploads/2017/06/Secured-by-Design-Reducing-Crime-by-Good-Design-reduced.pdf>

<sup>12</sup> Design Council (2006) 'The Principles of Inclusive Design'. Available at: <https://www.designcouncil.org.uk/sites/default/files/asset/document/the-principles-of-inclusive-design.pdf>

Department for Transport (2005) 'Inclusive mobility' Available at: <https://www.gov.uk/government/publications/inclusive-mobility>

Department for Transport (2007) 'Manual for Streets'. Available at: <https://www.gov.uk/government/publications/manual-for-streets>

Potential impact	Without mitigation	With Mitigation	Recommendations	Overall Equality and health effect
navigation who could benefit from improvements in this area.				
<p><b>Improved public realm and green space</b></p> <p>Renewal offers an opportunity to improve the public realm. The ability to access and use the public realm is vitally important to ensuring people feel that they are active members of their community. This includes basic activities such as using local shops or meeting up with people in a shared space outside close to home. In addition, the opening up of green space has been shown to impact positively on both physical and mental health.</p>	✓✓✓	✓✓✓	<ul style="list-style-type: none"> <li>Involve the local community in planning and designing improvements to the public realm and green spaces, specifically targeting protected characteristic groups that are likely to benefit from improvements e.g. children, older people and disabled people.</li> <li>Ensure the design of movement networks and public spaces specifically addresses the mobility needs of vulnerable groups. This can be achieved by applying principles of inclusive design.</li> </ul>	<p>There is likely to be a major positive impact on equality groups due to improved public realm and green space after delivery of the redevelopment programme.</p> <p><b>Overall, this risk is considered to be managed through a range of proportionate measures.</b></p>
<p><b>Provision of community resources and improved social cohesion</b></p> <p>Community resources provide important places of social connection and promote better health and wellbeing for many groups. For example, community hubs can provide an accessible centre point for local activities, services and facilities. They allow for a cross section of the community to be brought together in a safe place, allowing for better social cohesion and helping to address social isolation.</p>	✓✓✓	✓✓✓	<ul style="list-style-type: none"> <li>Continue to involve the local community in decisions about which resources should be incorporated into the area, specifically targeting protected characteristic groups that are likely to benefit from improvements.</li> <li>Ensure analysis is undertaken to understand on any potential pressure on public services that could result from redevelopment (eg. extra pressure on schools and health care services).</li> </ul>	<p>There is likely to be a major positive impact on equality groups due to the provision of community resources and improved social cohesion after delivery of the redevelopment programme</p> <p><b>Overall, this risk is considered to be managed through a range of proportionate measures.</b></p>
<p><b>New employment opportunities</b></p> <p>Renewal can act as a means of promoting economic growth and supporting job creation. For example, property development can contribute to urban economic regeneration by enabling local stores to grow and expand, and through attracting investment to the area and revitalising neighbourhoods. It can also facilitate improved connectivity between communities and places of employment and education. Improved opportunities</p>	✓✓✓	✓✓✓	<ul style="list-style-type: none"> <li>Work with owners of new businesses in the renewal area to employ local people, focussing on groups that are vulnerable to unemployment e.g. ethnic minority groups, disabled people, young people.</li> </ul>	<p>There is likely to be a major positive impact on equality groups due to new employment opportunities after delivery of the redevelopment programme</p> <p><b>Overall, this risk is considered to be managed through a range of proportionate measures.</b></p>

Potential impact	Without mitigation	With Mitigation	Recommendations	Overall Equality and health effect
to access employment and education can serve to help address issues of inequality and improve social mobility.				
<p><b>Improved housing provision</b></p> <p>Renewal can lead to improvements in housing provision within the regeneration area, thereby improving suitability, accessibility and affordability, as well as its quality and efficiency in energy consumption, addressing potential effects of cold housing.</p>	✓✓✓	✓✓✓	<ul style="list-style-type: none"> <li>Ensure housing meets the needs of current and future residents.</li> </ul>	<p>There is likely to be a major positive impact on equality groups due to improved housing provision after delivery of the redevelopment programme</p> <p><b>Overall, this risk is considered to be managed through a range of proportionate measures.</b></p>

## 7 Conclusion and action plan

### 7.1 Conclusion

The EqIA has identified a number of risks, opportunities and potential impacts that could arise for those with protected characteristics, as a result of the redevelopment of the Estate. The details of these impacts are set out in detail in Chapter 5 Impact Assessment.

The assessment found that the regenerated Estate has the potential to provide improved living conditions, housing quality, accessibility, public realm and community facilities. This, coupled with the majority vote in the February 2021 ballot for the redevelopment to go ahead means there is a compelling case in the public interest for the redevelopment. This must be weighed against the acknowledged potential risks set out above. In this case, the Council has sought to mitigate these through a range of reasonable and proportionate measures focused on engagement, rehousing assistance and compensation options in order to improve the outcomes of the redevelopment for the current and future Estate community.

### 7.2 Action plan

The following action plan seeks to establish activities and responsibilities following the planning application to continue to identify and address equality issues where they arise. It is the responsibility of Southwark Council to implement any recommendations and mitigations identified.

**Table 7.1: Tustin Estate recommended action plan**

Recommendation	Potential impact addressed	Timeframe	Responsibility
Work proactively and constructively through a range of channels, including face to face engagement where possible with residents, keeping up-to-date records of changing needs and circumstances, particularly if residents who will be most affected by refurbishment and/or redevelopment in order to remediate feelings of social isolation.	Loss of social cohesion and access to community resources Difficulty accessing finance Appropriate, accessible and affordable housing Impact of redundancy on health and well-being Loss of business	Ongoing during renewal period until completion of renewal (2028)	Southwark Council, especially the council's engagement team Independent resident advisor
Maintain continuity in access to community resources (e.g. churches and play areas) where possible. If this is not possible, consider pop-up spaces for these uses.	Loss of social cohesion and access to community resources	Ongoing during renewal period until completion of renewal (2028)	Southwark Council
Ensure that residents are signposted to the reallocation process (including financial advice) available online or via telephone, if necessary, to comply with COVID- 19 social distancing and self-isolation recommendations.	Difficulty accessing finance Appropriate, accessible and affordable housing	Ongoing, with priority during the Preparation period (Spring 2021- Summer 2022)	Southwark Council, especially the council's engagement team Independent resident advisor
Demolition works should be monitored closely and disruption should be minimised through the creation of a Construction Environmental Management Plan (CEMP), which would be implemented by the contractor carrying out the works, in order to address health impacts related to noise and air quality.	Health effects	Ongoing- periods of demolition from Autumn 2022- Autumn 2028	Southwark Council, contractor (TBC)
Throughout the improvement works, identify and work with vulnerable people whose protected characteristics may make them more vulnerable to adverse health impacts.	Health effects	Ongoing during renewal period until completion of renewal (2028)	Southwark Council, especially the council's engagement team
Access to communal outdoor space should be maintained during the construction period to limit impacts on health caused by social isolation.	Health effects	Ongoing during renewal period until completion of renewal (2028)	Southwark Council, contractor (TBC)

Recommendation	Potential impact addressed	Timeframe	Responsibility
Ensure best practices for enhancing safety and preventing crime are considered throughout the planning and construction process.	Safety and security	Ongoing during renewal period until completion of renewal (2028)	Southwark Council, contractor (TBC)
Ensure a process is in place for reporting and addressing incidents of Anti-Social Behaviour (ASB) within the Estate.	Safety and security	Ongoing	Southwark Council, especially the council's engagement team
Monitor the security of the Estate and consider additional security where concerns are flagged. However, any enhanced security measures should only be implemented as a last resort, if deemed necessary, and in conjunction with residents, as it risks adding to a sense of vulnerability, isolation, and loss of sense of community for residents.	Safety and security	Ongoing	Southwark Council
Offer business development support to existing businesses to ensure they are equipped to maximise the opportunity that the refurbishment and/or redevelopment may bring, such as information on how they might diversify their business.	Barriers to reemployment	Ongoing until new business space opens in Winter 2026	Southwark Council
Accessible format consultation materials, including but not limited to, easy read, different community languages, audio, and braille, should be available on request.	Information and communication	Ongoing during renewal period until completion of renewal (2028)	Southwark Council
Access to information and communication should be available in a number of formats, including online and in one to one meetings, to ensure that all residents have safe access to information and support services as COVID- 19 restrictions continue.	Information and communication	Ongoing during renewal period until completion of renewal (2028)	Southwark Council
Ensure businesses are fully informed of the timescales that would affect them as soon as possible, including when they if and would need to vacate the premises and the period of time they would be inactive for before being able to reopen on the refurbished or redeveloped Estate.	Difficulty accessing commercial finance	Ongoing during Preparation period (Spring 2021- Summer 2022) up until businesses move in Phase 2 (Summer 2024)	Southwark Council
Follow Crime Prevention Through Environmental Design (CPTED) and Secure by Design principles in designing the built environment and public realm.	Tackling crime and disorder	Ongoing during renewal period until completion of renewal (2028)	Southwark Council, Common Grounds
Ensure the design of movement networks and public spaces specifically addresses the mobility needs of vulnerable groups. This can be achieved by applying principles of inclusive design.	Improved access, mobility and navigation Improved public realm and green space	Ongoing until completion of public space.	Southwark Council, Common Grounds
Involve the local community in planning and designing improvements to the public realm and green spaces, specifically targeting protected characteristic groups that are likely to benefit from improvements e.g. children, older people and disabled people.	Improved access, mobility and navigation	Ongoing until completion of public space.	Southwark Council, Common Grounds
Continue to involve the local community in decisions about which resources should be incorporated into the area, specifically targeting protected characteristic groups that are likely to benefit from improvements.	Provision of community resources and improved social cohesion	Ongoing	Southwark Council
Ensure analysis is undertaken to understand on any potential pressure on public services that could result from redevelopment (eg. extra pressure on schools and health care services).	Provision of community resources and improved social cohesion	Ongoing during Preparation period, and updated subsequently if relevant.	Southwark Council
Work with owners of new businesses in the renewal area to employ local people, focussing on groups that are vulnerable to unemployment e.g. ethnic minority groups, disabled people, young people.	New employment opportunities	Ongoing	Southwark Council
Ensure housing meets the needs of current and future residents.	Improved housing provision	Ongoing	Southwark Council



Recommendation	Potential impact addressed	Timeframe	Responsibility
Up-to-date information about the renewal, including what is going on before, during and after all stages of the renewal process should be shared with residents, businesses and community resources. This provides them with the means to understand the options available to them in order to make an informed decision on what they need to do and when.	Information and communication	Ongoing	Southwark Council, especially the council's engagement team
Businesses should qualify for disturbance payments in reflection of the potential impact of the redevelopment on their business	Potential loss of businesses	Ongoing	Southwark Council
Offer business development support to existing businesses to ensure they are equipped to maximise the opportunity that the refurbishment and/or redevelopment may bring. This should include engagement with each of the businesses to understand each business model, trading history, relocation requirements and identification of areas for support and diversification.	Potential loss of businesses	Ongoing	Southwark Council
Ensure that a business relocation and support approach is implemented to assist businesses in the relocation process and ensure minimum business disruption and to prevent the loss of business, if the business chooses to relocate permanently.	Potential loss of businesses	Ongoing	Southwark Council

# Appendices

## A. Analysis of existing evidence

This chapter sets out the finding of the desk-based review process, providing a literature review of the potential effects of the renewal on people with protected characteristics. All potential risks and opportunities of a typical housing renewal project have been considered.

Section A.1 discusses the potential effects on residents and community resources associated with rehousing. Section A.2 provides an overview of the potential effects of renewal on businesses and section A.3 sets out the community effects of estate renewal. All are segmented into key thematic areas and summarised in the impact assessment in Chapter 5.

### A.1 Impact on resident and community resources during renewal

#### A1.1 Loss of social cohesion and access to community resources

The renewal process can involve temporary or permanent resettlement of residents and demolition of housing and community resources. This could lead to the risk of loss of social infrastructure and temporary or permanent access to this amenity provision. In particular, it can increase residents' distances from facilities or places of social connection located on or in close proximity to their neighbourhood. This can impact on all parts of the community, but can have a disproportionately negative effect on children, older people, disabled people, people who are pregnant, people from ethnic minority backgrounds and people from minority faith groups.

##### Children

The instability caused by involuntary relocation has the potential to be particularly disruptive to children. Such disruption can be attributed to stress and anxiety relating to changing schools and the need to adapt to new routines, staff, facilities and peers. It is generally accepted that children develop better in stable environments with a degree of routine; sudden and dramatic disruptions can be both stressful and affect feelings of security.<sup>13</sup>

Evidence outlined by the Centre for Social Justice has indicated that where residential moves are accompanied by school moves for older children, the impact can be severe. It suggests that school moves can disrupt learning and are associated with a weaker educational performance within secondary school, particularly for children from disadvantaged backgrounds.<sup>14</sup> Only 27 per cent of students who move secondary schools three times or more achieve five A\* to C grade GCSEs, compared to the national average of 60 per cent.<sup>15</sup> Research from the Centre for Social Justice also found that two or more school moves before the age of twelve can lead to behavioural problems later in childhood.<sup>16</sup>

<sup>13</sup> Sandstrom, H and Huerta, S (2013) 'The Negative Effects of Instability on Child Development' Available at: <https://www.urban.org/sites/default/files/publication/32706/412899-The-Negative-Effects-of-Instability-on-Child-Development-A-Research-Synthesis.PDF>

<sup>14</sup> The Centre for Social Justice (2016) 'Home Improvements, a social justice approach to housing policy'. Available at: <https://www.centreforsocialjustice.org.uk/core/wp-content/uploads/2016/08/Home-Improvements-full-report.pdf>

<sup>15</sup> The Centre for Social Justice (2016) 'Home Improvements, a social justice approach to housing policy'.

<sup>16</sup> The Centre for Social Justice (2016) 'Home Improvements, a social justice approach to housing policy'. Available at: <https://www.centreforsocialjustice.org.uk/core/wp-content/uploads/2016/08/Home-Improvements-full-report.pdf>

<sup>17</sup> University of Manchester (undated) 'The impact of primary-secondary school transition for children with autism spectrum conditions: a longitudinal, mixed-methods study'. Available at: <http://documents.manchester.ac.uk/display.aspx?DocID=20008%20>

<sup>18</sup> Yeung, J., Wearing, S., & Hills, A. P. (2008). *Child transport practices and perceived barriers in active commuting to school. Transportation Research Part A: Policy and Practice*, 42(6), 895-900.

<sup>19</sup> Joseph Rowntree Foundation (2016) 'Falling short: the experience of families living below the minimum income standard'. Available at: <https://www.jrf.org.uk/report/falling-short-experiences-families-below-minimum-income-standard>

Children with autism spectrum conditions may also find new routines, expectations, and social relationships of a new school environment to be especially challenging, which can have further negative effects on educational attainment and wellbeing.<sup>17</sup>

Relocation can often mean a longer journey travelling to school, which can result in negative effects on health and well-being due to increased time spent inactive. Research has found that the travel distance to school influences the transportation mode choice of children, and longer distances can result in a change from active transportation such as cycling or walking, to sedentary transportation, such as vehicular transport.<sup>18</sup>

Children from low-income families may be particularly impacted by relocation due to loss of local informal child care support. A study from the Joseph Rowntree Foundation showed that informal childcare support from grandparents was one important factor in enabling parents to work, generating income and preventing families from going without daily necessities.<sup>19</sup>

Relocation can also have negative mental health effects on children and adolescents for a number of reasons, including: weakened social ties, disturbed social networks, household disruption, social isolation and a reduction in parent-child interactions.<sup>20</sup>

Loss of relationships with peers and adults can cause anxiety and hinder both social development and educational attainment.<sup>21</sup> Children at key stage two experience an average of a twelve per cent drop in Maths and English attainment within a year of a changing schools.<sup>22</sup>

The loss of facilities where children can socialise, and play could be particularly detrimental to children living in the local area. Demolition and resource relocation could adversely affect access to child social networks. Evidence suggests that early years provision plays an important role in a child's development and that free play in early childhood is a vital experience through which child learn social, conceptual and creative skills, as well as increasing their knowledge and understanding of the world.<sup>23</sup>

##### Older people

The loss of long-standing community links risks creating feelings of isolation, particularly amongst older people. Age UK research indicates that physical isolation, a lack of social resources and a removal of familiarity can all contribute to feelings of isolation and loneliness amongst older people.<sup>24</sup> Age UK research indicates that physical isolation, a lack of social resources and a removal of familiarity can all contribute to feelings of isolation and loneliness amongst older people.<sup>25</sup> This in turn can lead to negative health outcomes such as poorer mental health, a higher likelihood of developing certain health conditions (e.g. obesity and alcoholism) and a greater risk of hospitalisation.<sup>26</sup> Loneliness increases the likelihood of mortality by 26 per cent

<sup>20</sup> Morris, T, Manley D, Northstone, K, Sabel, C, (2017): 'How do moving and other major life events impact mental health? A longitudinal analysis of UK children'

<sup>21</sup> Adam, Emma K., and P. Lindsay Chase-Lansdale. (2002): 'Home Sweet Home(s): Parental Separations, Residential Moves, and Adjustment in Low-Income Adolescent Girls.' *Developmental Psychology* 8(1) :792-80

<sup>22</sup> RSA. (2013): 'Falling between the cracks; Exploring in-year admissions in schools in England'

<sup>23</sup> Nation Children's Bureau (2007): 'Free Play in Early Childhood'

<sup>24</sup> Age UK (2015) 'Evidence Review: Loneliness in Later Life'. Available at: [https://www.ageuk.org.uk/globalassets/age-scotland/documents/reports-and-publications/reports-and-briefings/health-wellbeing/rb\\_june15\\_loneliness\\_in\\_later\\_life\\_evidence\\_review.pdf](https://www.ageuk.org.uk/globalassets/age-scotland/documents/reports-and-publications/reports-and-briefings/health-wellbeing/rb_june15_loneliness_in_later_life_evidence_review.pdf)

<sup>25</sup> Age UK (2015) 'Evidence Review: Loneliness in Later Life'. Available at: [https://www.ageuk.org.uk/globalassets/age-scotland/documents/reports-and-publications/reports-and-briefings/health-wellbeing/rb\\_june15\\_loneliness\\_in\\_later\\_life\\_evidence\\_review.pdf](https://www.ageuk.org.uk/globalassets/age-scotland/documents/reports-and-publications/reports-and-briefings/health-wellbeing/rb_june15_loneliness_in_later_life_evidence_review.pdf)

<sup>26</sup> IoTUK (2017): 'Social Isolation and Loneliness in the UK' Available at: <https://iotuk.org.uk/social-isolation-and-loneliness-report/>

among those over the age of 65 and raises the risk of developing conditions, such as high blood pressure, heart disease and stroke.<sup>27</sup> The link between older people and the likelihood of experiencing feelings of isolation and loneliness indicates that this group may be disproportionately negatively impacted by relocation. This can equally be the case for older people remaining in or very close to an area being redeveloped.<sup>28</sup>

As demolition proceeds, local amenities and services (such as shops, community centres and health facilities) may decide to close. Some community resources may be included in the demolition process. The loss of these resources can have a disproportionately negative effect on older people remaining in the neighbouring areas, who may find it more challenging to travel to new services outside of their neighbourhood.<sup>29</sup> Furthermore, for local businesses, the loss of their traditional customer base following the relocation of residents can force closures, further reducing the choice of services available to people in the community, with older people among the most likely to be affected. Research from Age UK found that reduced access to community facilities can, have serious negative effects on mental health and wellbeing, and increase rates of cardiovascular disease in older people.<sup>30</sup>

The impact of the COVID- 19 pandemic has already had an impact on feelings of social isolation amongst older people. In the UK, from March 2020, almost nine million people over the age of 70 were advised by the Government to 'strictly adhere' to social distancing rules, only leaving their home for essential purposes. Restrictions have increased social isolation and feelings of loneliness for older people.<sup>31</sup>

### Disabled people

Relocation has the potential to cause stress, anxiety and uncertainty for disabled people. Changes, both minor and major, to some disabled people's routines and surroundings may adversely affect feelings of security and comfort. For example, research shows that people on the autism spectrum, tend to prefer set routines (such as traveling via the same routes) and rigid structures (such as preferences to room layouts or objects) as they can help to bring order to their daily life so that they know what is going to happen and when.<sup>32</sup> Similarly, for those suffering from dementia or Alzheimer's learning about and interpreting new environments can be difficult, and relocation can create feelings of dissonance, confusion and discomfort.<sup>33</sup>

The loss of community links may also have a disproportionate impact on disabled people. Findings from the Jo Cox Commission on loneliness found that over half of disabled people say they are lonely, with around one in four feeling lonely every day.<sup>34</sup> The report also states that forming and maintaining social connections can be a

challenge for people with a range of disabilities, including those with sensory impairments, learning disabilities, autism, physical and mobility impairments, mental health conditions, dementia, head and brain injury, neurological conditions, cancer and HIV. As disabled people can experience more barriers to forming social connections the loss of existing local social connections through residential displacement or loss of social resources could lead to disabled people experiencing further loneliness and isolation.

Relocation can also create stress, anxiety and uncertainty for people with disabilities regarding the accessibility of their new home. A report published by the EHRC identifies that across all housing tenures, there is a severe shortage of accessible housing. For example, one in three disabled people living in private rented properties live in unsuitable accommodation. This figure is one in five for disabled people living in social housing, and one in seven for disabled people who own their own home. Overall, in England, only 7% of homes offer the basic four accessibility features to make a home fully accessible (level access to the entrance, a flush threshold, sufficiently wide doorways and circulation space, and a toilet at entrance level).<sup>35</sup> This suggests that disabled people are more likely to be concerned about the accessibility of their new home compared to other residents. Additionally, a report by Leonard Cheshire Disability highlights that only 4% of those with mobility impairments who have looked for accessible homes said they were easy to find. In addition, they also found that some disabled people have also experienced difficulties in terms of local authorities being reluctant to fund adaptations that would allow them to live independently.<sup>36</sup>

The disruption of social networks caused by relocation may also cause negative health outcomes for people with mental health problems and autism, many of whom depend on social networks to maintain their standard of living<sup>37</sup>. People with mental health problems may be disproportionately impacted by stress and anxiety, especially if relocation is unexpected or accompanied by financial stress<sup>38</sup>. Research from Wilding (2017) found that increased rates of mental ill health are associated with involuntary residential relocation.<sup>39</sup>

The impact of the COVID- 19 pandemic and restrictions throughout 2020 have also had a negative impact on feelings of social isolation amongst disabled people. In May 2020 the Office for National Statistics found that nearly two thirds of disabled people said that COVID-19 concerns were affecting their wellbeing, compared with half of non-disabled people. One of the main reasons cited was feelings of loneliness or isolation.<sup>40</sup>

### Ethnic minority and/or minority faith groups

Ethnic minority and minority faith communities are also likely to experience adverse effects as a result of relocation. It has been identified that these groups may be more reliant on social networks, faith and cultural facilities. They are likely to have concerns over loss of social

<sup>27</sup> Age UK (2015): 'Campaign to end loneliness: threat to health'.

<sup>28</sup> Age UK (2015): 'Loneliness and Isolation evidence review'

<sup>29</sup> A. Power (2008) 'Does demolition or refurbishment of old and inefficient homes help to increase our environmental, social and economic viability'. Available at: <https://www.sciencedirect.com/science/article/pii/S0301421508004709>

<sup>30</sup> Age UK (2015): 'Campaign to end loneliness): 'Threat to health'

<sup>31</sup> Wu, Bei (2020): 'Social isolation and loneliness among older adults in the context of COVID-19: a global challenge'. Available at: <https://ghrp.biomedcentral.com/articles/10.1186/s41256-020-00154-3>

<sup>32</sup> National Autistic Society (2016) 'Obsessions, repetitive behaviour and routines'. Factsheet. Available at: <https://www.autism.org.uk/about/behaviour/obsessions-repetitive-routines.aspx>

<sup>33</sup> Son, G. R., Therrien, B., & Whall, A. (2002). 'Implicit memory and familiarity among elders with dementia'. *Journal of Nursing Scholarship*, 34(3), 263-267. Available at: <https://lemosandcrane.co.uk/resources/Journal%20of%20Nursing%20Scholarship%20-%20Implicit%20Memory%20and%20Familiarity%20Among%20Elders%20with%20Dementia.pdf>

<sup>34</sup> Sense for the Jo Cox Commission on Loneliness (2017) 'Someone cares if I'm not there'. Available at: <https://www.sense.org.uk/support-us/campaign/loneliness/>

<sup>35</sup> DCLG (2015). 'English Housing Survey: Adaptations and Accessibility Report' Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/539541/Adaptations\\_and\\_Accessibility\\_Report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/539541/Adaptations_and_Accessibility_Report.pdf)

<sup>36</sup> Leonard Cheshire Disability (2014): 'The hidden housing crisis' Available at: <https://www.leonardcheshire.org/sites/default/files/Hidden%20Housing%20Crisis%20July%202014.pdf>

<sup>37</sup> National Autism Society. (2017): 'Moving house' URL: <https://www.autism.org.uk/movinghouse> 56

<sup>38</sup> Wilding et al., (2018): 'Place and preference effects on the association between mental health and internal migration within Great Britain' *Health and Place*. 52(1), pp 180-187

<sup>39</sup> Wilding et al., (2018): 'Place and preference effects on the association between mental health and internal migration within Great Britain' *Health and Place*. 52(1), pp 180-187

<sup>40</sup> ONS (2020): 'Coronavirus and the social impacts on disabled people in Great Britain: May 2020'. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/coronavirusandthesocialimpactsondisabledpeopleingreatbritain/may2020>

networks and facilities, as well as fears of isolation, harassment or language barriers in new locations.<sup>41</sup> ethnic minority communities also tend to experience greater difficulty in accessing health care when compared to other sections of the population, and rehousing may exacerbate the issue.<sup>42</sup>

### Pregnancy and maternity

Evidence has suggested that women who move home while pregnant tend to experience an increase in stress and depression levels above and beyond that of women who move home when not pregnant.<sup>43</sup> Evidence also suggests that the stress and physical exercise involved with relocation can slightly increase the risk of miscarriage, preterm delivery, small for gestational age new-borns, low birthweight, preeclampsia / gestational hypertension and can exacerbate deep vein thrombosis which pregnant women are more at risk of.<sup>44</sup>

Relocation can result in adverse health effects on those who are pregnant.. A 2015 survey carried out by the Care Quality Commission assessed the impact that having the same midwife had on pregnant women. The results showed that women who had the same midwife throughout pregnancy had more positive midwifery experiences than those who did not. The most negative experiences occurred with those who wanted to see the same midwife but were unable to.<sup>45</sup> Should relocation result in the need to make changes to preestablished antenatal services and relationships, this could negatively impact pregnant individuals.

#### A.1.2 Difficulty accessing finance (e.g. costs associated with moving home)

The need for residents to resettle can lead to an increase in their financial outgoings due to costs associated with moving and obtaining new housing. Rehousing costs could include removal services, the need to adapt a new home or buy new furniture. Access to the required finance to obtain new housing may be most limited for those at risk of financial exclusion, who experience difficulty trying to access appropriate and mainstream financial services, such as bank accounts, loans and mortgages.

Financial exclusion arises when an individual faces difficulty when trying to access appropriate and mainstream financial services. In the UK, certain groups are particularly vulnerable to financial exclusion. These include, **young people** not in employment, **lone parents**, **ethnic minority** groups and **older people**.<sup>46</sup> For example, young people may be unable to purchase a property due to cutbacks in social housing and increased house pricing.<sup>47</sup> For older people, research suggests that they (particularly those who have paid off a previous mortgage or those with no recent experience of moving home) are more reluctant to move.<sup>48</sup> Older people often lack the same financial means and income flexibility that afford people from younger age groups and those in full time employment the widest range of home ownership options. Relocation may

<sup>41</sup> Joseph Rowntree Foundation (2007) 'Demolition, Relocation and affordable rehousing: Lessons from the housing market renewal pathfinders'. Available at: <https://www.jrf.org.uk/report/addressing-housing-affordability-clearance-and-relocation-issues-housing-market-renewal>

<sup>42</sup> BME Health Forum (2010) 'Good Access in Practice: Promoting community development in the delivery of healthcare'. Available at: [http://bmehf.org.uk/files/9013/6536/5135/Good\\_Access\\_in\\_Practice\\_final.pdf](http://bmehf.org.uk/files/9013/6536/5135/Good_Access_in_Practice_final.pdf)

<sup>43</sup> Tunstall, H., Pickett, K. and Johnsen, S. (2010): 'Residential mobility in the UK during pregnancy and infancy: Are pregnant women, new mothers and infants 'unhealthy migrants'?'

<sup>44</sup> NHS (2016): 'Deep vein thrombosis'; Royal College of Physicians and Faculty of Occupational Medicine (date unknown): 'Advising women with a healthy, uncomplicated, singleton pregnancy on: heavy lifting and the risk of miscarriage, preterm delivery and small for gestational age'

<sup>45</sup> Care Quality Commission (2015): '2015 survey of women's experiences of maternity care'. Available at: [https://www.cqc.org.uk/sites/default/files/20151215b\\_mat15\\_statistical\\_release.pdf](https://www.cqc.org.uk/sites/default/files/20151215b_mat15_statistical_release.pdf)

<sup>46</sup> Joseph Rowntree Foundation (2008): 'Financial inclusion in the UK: Review of policy and practice'. Available at: <https://www.jrf.org.uk/sites/default/files/jrf/migrated/files/2234.pdf>

<sup>47</sup> Financial Conduct Authority (2016) 'Access to Financial Services in the UK' Available here: <https://www.fca.org.uk/publication/occasional-papers/occasional-paper-17.pdf>

also require older people who have savings and investments to use them in order to secure a new home, affecting their financial independence and stability.

Further, according to evidence presented to the House of Commons Communities and Local Government Committee, low income ethnic minority households often have limited experience of institutional loan finance.<sup>49</sup> They may also be less able to access commercial loans due to poor credit-ratings or their location in 'high risk' postcodes.

Those people from an ethnic minority background are more likely to live in low income households compared to those who are White British or from Other White Ethnic groups.<sup>50</sup>

Financial exclusion is also geographically focussed. It is often the case that large numbers of financially excluded individuals live in areas where there are high levels of **deprivation**. Research suggests that approximately 35% of people living in deprived do not have a bank account, and that 68% of financially disengaged people living in the top 10% most financially exclude postcodes.<sup>51</sup>

According to evidence presented to the House of Commons Communities and Local Government Committee, relocation may also impact people who have savings and investments to use them in order to secure a new home, affecting their financial independence and stability.<sup>52</sup>

#### A.1.3 Issues accessing appropriate, accessible and affordable housing

As renewal processes often involve the rehousing of many residents, issues may arise regarding sourcing suitable housing that meets the needs of the following groups:

##### Children

Families with children may also find it difficult to find housing that can accommodate their needs. A 2016 report highlighted that 3.6 million children in England are thought to be affected by poor housing, and a higher proportion of children live in overcrowded conditions than any other age group.<sup>53</sup> Children who live in overcrowded accommodation have an increased risk of developing respiratory conditions, infections and psychological problems.<sup>54</sup> It can also increase their risk of injury, for example, bed sharing, which is more likely to occur in overcrowded houses, has been identified as a factor contributing to Sudden Infant Death Syndrome (SIDS). Sleep disturbance is also more common amongst children in overcrowded households. Overall, overcrowded conditions present a potential source of stress and can negatively impact a child's emotional and physical health in the long term.<sup>55</sup>

<sup>48</sup> Joseph Rowntree Foundation (2007) 'Demolition, Relocation and affordable rehousing: Lessons from the housing market renewal pathfinders'. Available at: <https://www.jrf.org.uk/report/addressing-housing-affordability-clearance-and-relocation-issues-housing-market-renewal>

<sup>49</sup> House of Commons Communities and Local Government Committee (2011) 'Regeneration Sixth Report of Session 2010–12'. Available at: <https://publications.parliament.uk/pa/cm201012/cmselect/cmcomloc/1014/1014.pdf>

<sup>50</sup> Department for Work and Pensions (2015) 'Low income'

<sup>51</sup> Resolution Foundation (2007): 'In brief: Financial exclusion'.

<sup>52</sup> House of Commons Communities and Local Government Committee (2011) 'Regeneration Sixth Report of Session 2010–12'. Available at: <https://publications.parliament.uk/pa/cm201012/cmselect/cmcomloc/1014/1014.pdf>

<sup>53</sup> National Children's Bureau (2016): 'Housing and the health of young children: Policy and evidence briefing for the VCSE sector'. Available at: <https://www.ncb.org.uk/sites/default/files/field/attachment/Housing%20and%20the%20Health%20of%20Young%20Children.pdf>

<sup>54</sup> House of Commons Communities and Local Government Committee (2011) 'Regeneration Sixth Report of Session 2010–12'. Available at: <https://publications.parliament.uk/pa/cm201012/cmselect/cmcomloc/1014/1014.pdf>

<sup>55</sup> National Children's Bureau (2016): 'Housing and the health of young children: Policy and evidence briefing for the VCSE sector'. Available at: <https://www.ncb.org.uk/sites/default/files/field/attachment/Housing%20and%20the%20Health%20of%20Young%20Children.pdf>

## Disabled people

Disabled people (particularly those with mobility impairments) often experience difficulties trying to find a suitable, accessible home. A report by Leonard Cheshire Disability highlights that only 4% of those with mobility impairments who have looked for accessible homes said they were easy to find. In addition, they also found that some disabled people have also experienced difficulties in terms of local authorities being reluctant to fund adaptations that would allow them to live independently.<sup>56</sup>

A report published by the Equality and Human Rights Commission has further highlighted some of the existing issues in terms of housing for disabled people. The report states that across all housing tenures, there is a severe shortage of accessible housing. For example, one in three disabled people living in private rented properties live in unsuitable accommodation. This figure is one in five for disabled people living in social housing, and one in seven for disabled people who own their own home. Overall, in England, only 7% of homes offer the basic four accessibility features to make a home fully accessible (level access to the entrance, a flush threshold, sufficiently wide doorways and circulation space, and a toilet at entrance level).<sup>57</sup> One conclusion of the report was that there are too many gaps in data held by local authorities. For example, 65% of local authorities do not know whether its social or affordable rented housing stock is accessible.<sup>58</sup>

People with a disability who live in social housing could experience particularly acute effects. The introduction of the 'removal of the spare room subsidy' or 'bedroom tax' in 2013 has had a disproportionate impact on disabled people in social housing; two thirds of those affected have a disability. Research shows that disabled people have found it difficult to take up proposed mitigation measures, such as taking up work, working longer hours or downsizing, and thus have had their income reduced by £12 to £22 per week, depending on the number of spare bedrooms. These changes have resulted in increased poverty and adverse effects on health, well-being and social relationships of disabled residents in social housing.<sup>59</sup>

## Ethnic minority

Research by the Runnymede Trust highlighted that people from all ethnic minority groups are more likely to live in overcrowded housing when compared to the White British population. For example, around 40% of Black African and 36% of Bangladeshi people in the UK live in overcrowded housing.<sup>60</sup>

Ethnic minority households may also be impacted by the availability of affordable housing when relocating to new areas. It was reported in 2017 that rents are less affordable for most ethnic

minority groups when compared to White British households.<sup>61</sup> Two-fifths of people from an ethnic minority background live in low-income households.<sup>62</sup> Additionally, evidence from the Runnymede Trust suggests that ethnic minority communities are more likely to experience homelessness than their white counterparts.<sup>63</sup> Therefore, it is possible that ethnic minority households could experience difficulties in finding suitable housing that accommodates their needs.

## Older people

When relocating, a lack of affordable and/or quality housing is more likely to adversely affect older people (and particularly pensioners) who have lower average incomes than working-age people and are therefore less likely to be able to secure additional sources of income to buy a new property.<sup>64</sup> Research by the Joseph Rowntree Foundation found that older people often lack the same financial means and income flexibility compared to other age groups, especially younger people and those in employment.<sup>65</sup> A lack of financial means can limit the range of ownership options available to older people and relocation may cause older people to use savings and investments in order to secure a new home. This can potentially affect their long-term financial independence and stability.<sup>66</sup> Research from the Council of Mortgage Lending shows that older people only account for one per cent of all mortgage lending, which further indicates that they may experience difficulties in accessing finance to facilitate relocation.<sup>67</sup>

Older people are also more likely to need specialist housing which meets their needs. Evidence estimates that the potential national demand for specialist retirement housing, which cannot be met from existing stock.<sup>68</sup> As such, it is likely to be more difficult for older people to relocate to appropriate housing. Health effects, such as increases in respiratory disease, have been associated with poor housing and could arise as a consequence of the need to relocate to a less well-suited property. Older people have a higher rate of health conditions such as respiratory disease, compared to the general population. This makes such effects more likely to arise amongst this group.<sup>69</sup>

### A.1.4 Health effects

Relocation can have a negative impact on an individual's mental health and well-being, as measured by the SF-12 Mental Health Composite Score<sup>70</sup> and Warwick-Edinburgh Mental Wellbeing Scale test.<sup>71</sup> These tests have shown that relocation can create increased levels of depression and anxiety.<sup>72</sup> The associated impacts have been found to be more severe when there is a lack or perceived lack of control over the decision.<sup>73</sup> This stress has been attributed to

<sup>56</sup> Leonard Cheshire Disability (2014): 'The hidden housing crisis' Available at:

<https://www.leonardcheshire.org/sites/default/files/Hidden%20Housing%20Crisis%20July%202014.pdf>

<sup>57</sup> DCLG (2015). 'English Housing Survey: Adaptations and Accessibility Report' Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/539541/Adaptations\\_and\\_Accessibility\\_Report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/539541/Adaptations_and_Accessibility_Report.pdf)

<sup>58</sup> Equality and Human Rights Commission (2018): 'Housing and disabled people: Britain's hidden crisis'. Available at:

<https://www.equalityhumanrights.com/sites/default/files/housing-and-disabled-people-britains-hidden-crisis-main-report.pdf>

<sup>59</sup> Moffatt, S., Lawson, S., Patterson, R., Holding, E., Dennison, A., Sowden, S., & Brown, J. (2015). A qualitative study of the impact of the UK 'bedroom tax'. *Journal of Public Health*, 38(2), 197-205.

<sup>60</sup> Runnymede Trust (2016) 'Ethnic Inequalities in London: Capital For All'. Available at:

<https://www.runnymedetrust.org/uploads/images/London%20Inequality%20report%20v3.pdf>

<sup>61</sup> Shelter (2017) 'BAME homelessness matters and is disproportionately rising – time for the government to act'. Available at:

<http://blog.shelter.org.uk/2017/10/bame-homelessness-matters-and-is-disproportionately-rising-time-for-the-government-to-act/>

<sup>62</sup> The Poverty Site (2017). See: <http://www.poverty.org.uk/06/index.html>

<sup>63</sup> Runnymede Trust (2014) 'Black and Asian Britons more likely to be homeless or live in overcrowded houses'.

<https://www.runnymedetrust.org/news/558/272/Black-and-Asian-Britons-more-likely-to-be-homeless-or-live-in-overcrowded-homes.html>

<sup>64</sup> Council of Mortgage Lending. (2015): 'Pension tension: the challenges for older borrowers'

<sup>65</sup> Joseph Rowntree Foundation. (2007): 'Demolition, Relocation and affordable rehousing: Lessons from the housing market renewal pathfinders.'

<sup>66</sup> Joseph Rowntree Foundation. (2007): 'Demolition, Relocation and affordable rehousing: Lessons from the housing market renewal pathfinders'

<sup>67</sup> Council of Mortgage Lending. (2015): 'Pension tension: the challenges for older borrowers'

<sup>68</sup> Housing Age UK (2014): 'Housing in later life'

<sup>69</sup> Housing Age UK (2014): 'Housing in later life'

<sup>70</sup> The SF-12 is a multipurpose short form survey with 12 questions, all selected from the SF-36 Health Survey (Ware, Kosinski, and Keller, 1996). The questions are combined, scored, and weighted to create two scales that provide glimpses into mental and physical functioning and overall health-related-quality of life.

<sup>71</sup> The Warwick-Edinburgh Mental Well-being scale was developed to enable the monitoring of mental wellbeing in the general population and the evaluation of projects, programmes and policies which aim to improve mental wellbeing. WEMWBS is a 14 item scale with 5 response categories, summed to provide a single score ranging from 14-70. The items are all worded positively and cover both feeling and functioning aspects of mental wellbeing.

<sup>72</sup> Cleland, C., Kearns, A., Tannahill, C. and Ellaway, A. (2016). The impact of life events on adult physical and mental health and well-being: longitudinal analysis using the GoWell health and well-being survey. Available at: <https://bmresnotes.biomedcentral.com/articles/10.1186/s13104-016-2278-x>

<sup>73</sup> Thomson H, Petticrew M, Douglas M. (2003): 'Health impact assessment of housing improvements: Incorporating research evidence'. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1732281/pdf/v057p00011.pdf>

the anticipation of disruption, extra costs for residents and undermining of community stability and support networks.

#### Children, young people, older people and disabled people

Relocation can create a great deal of stress and anxiety amongst **children** and **young people** due to the need to adapt to new routines, facilities and surroundings.<sup>74</sup>

There is also evidence that involuntary relocation can have a significant impact on **older people**. For example, it has been shown that mortality rates for those moved involuntarily due to urban renewal (either temporarily or permanently) can be higher than non-movers and those who move voluntarily.<sup>75</sup>

As noted above, for older people and disabled people, the loss of community connections due to relocation may lead to feelings of isolation and loneliness, which are in turn linked to negative health outcomes such as poorer mental health, a higher likelihood of developing certain health conditions (e.g. obesity and alcoholism) and a greater risk of hospitalisation.<sup>76</sup>

Older people and disabled people are also likely to be disproportionately affected by changes in air quality that may occur throughout the demolition and construction stages of a scheme. Older people with respiratory conditions such as asthma are likely to be more susceptible to the effects of air pollution when compared to other groups. This is particularly the case if they have underlying COPD (Chronic Obstructive Pulmonary Disease).<sup>77</sup> Disabled people with heart or lung conditions are also at an increased risk of becoming ill and needing treatment as a result of air pollution.<sup>78</sup>

Noise pollution may arise as a result of demolition and construction. Research has linked noise pollution to several adverse outcomes for older people, including cardiovascular diseases, sleep disturbance, tinnitus, and stress.<sup>79</sup>

#### Expectant mothers and children

There are associated health effects related to the demolition of housing and the displacement from housing. For example, it has been found that the birth weight of babies can be affected by demolition and displacement. This is due to the potential for expectant mothers to experience an increase in stress and loss of social support when displacement occurs.<sup>80</sup> As the redevelopment involves both demolition and relocation, it is possible that this adverse impact may arise.

Children are likely to be disproportionately affected by changes in noise pollution and air quality that may occur throughout the demolition and construction stages of a scheme. Noise

associated with demolition and construction can also impact the health of vulnerable people remaining in the nearby community. Research shows that noise can negatively affect children's cognitive learning and memory.<sup>81</sup>

Exposure to air pollution during infancy can result in neurodevelopment and long-term cognitive health problems.<sup>82</sup> In addition, research from Asthma UK highlights that air pollution is more detrimental to children when compared to other age groups with the condition. This is due to children have faster breathing rates and lungs that are still developing.<sup>83</sup>

Lastly, antenatal exposure to air pollution may alter the lung development of a baby whilst in the womb. If a baby is exposed to significant levels of air pollution, this can increase the risk of premature birth and low birth weight.<sup>84</sup>

#### A.1.5 Safety and security

In the lead up to the renewal process and during the decanting and demolition of properties in the area, properties will be vacated and can fall into disrepair. This can attract unwanted activity including anti-social behaviour and crime such as increased vandalism, arson, break-ins and other damage to neighboring homes.<sup>85</sup>

#### Children, young people, older people, disabled people, ethnic minority groups, LGBT people, men and women

This potential increase in crime can impact a number of vulnerable groups remaining in the community during demolition who are more likely to be a victim or witness of crime. An Ipsos MORI survey on public views of policing in England and Wales in 2016 determined that groups who were more likely to have had contact with their local police as a victim or witness include: young people aged 16-34, disabled people, those from ethnic minority backgrounds, and lesbian, gay, bisexual and transgender (LGBT) people.<sup>86</sup>

The Crime Survey for England and Wales (CSEW), has also identified that a number of protected characteristic groups are more likely to be victims to crime:

- Men are more likely to be victims of violent crime than women.<sup>87</sup>
- Mixed and Asian ethnic groups are more likely to have said they were victim of crime compared to white people.<sup>88</sup>
- Younger people aged 16 to 24 are more likely to be victims of violence than those in older age groups.<sup>89</sup>

<sup>74</sup> Sandstrom, H and Huerta, S (2013): 'The Negative Effects of Instability on Child Development'. Available at: <https://www.urban.org/sites/default/files/publication/32706/412899-The-Negative-Effects-of-Instability-on-Child-Development-A-Research-Synthesis.PDF>

<sup>75</sup> Danermark BD, Ekstrom ME and Bodin LL (1996): 'Effects of residential relocation on mortality and morbidity among elderly people'. Available at: [https://www.academia.edu/19474641/Effects\\_of\\_residential\\_relocation\\_on\\_mortality\\_and\\_morbidity\\_among\\_elderly\\_people](https://www.academia.edu/19474641/Effects_of_residential_relocation_on_mortality_and_morbidity_among_elderly_people)

<sup>76</sup> IoTUK (2017) 'Social Isolation and Loneliness in the UK'. Available at: <https://iotuk.org.uk/social-isolation-and-loneliness-report/>

<sup>77</sup> Asthma UK (2017): 'Pollution'. Available at <https://www.asthma.org.uk/advice/triggers/pollution/>

<sup>78</sup> Department for Environmental Food and Rural Affairs (2013): 'Guide to UK Air Pollution Information Resources'. Available at:

<sup>79</sup> World Health Organisation (2011): 'Burden of disease from environmental noise Quantification of healthy life years lost in Europe'. Available at: [http://www.who.int/quantifying\\_ehimpacts/publications/e94888.pdf?ua=1](http://www.who.int/quantifying_ehimpacts/publications/e94888.pdf?ua=1)

<sup>80</sup> Kramer, M., et al. (2012): 'Housing Transitions and Low Birth Weight Among Low-Income Women: Longitudinal Study of the Perinatal Consequences of Changing Public Housing Policy'. Available at: <https://www.ncbi.nlm.nih.gov/pubmed/23078464>

<sup>81</sup> Gupta, A. et al (2018): 'Noise Pollution and Impact on Children Health'. Available at: <https://link.springer.com/article/10.1007/s12098-017-2579-7>

<sup>82</sup> Royal College of Physicians (2016) 'Every breath we take: the lifelong impact of air pollution'. Available at: <https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution>

<sup>83</sup> Asthma UK (2017): 'Pollution'. Available at <https://www.asthma.org.uk/advice/triggers/pollution/>

<sup>84</sup> British Lung Foundation (2016): 'How air pollution affects your children's lungs'. Available at: <https://www.blf.org.uk/support-for-you/signs-of-breathing-problems-in-children/air-pollution>

<sup>85</sup> Power, A. (2010): 'Housing and sustainability: demolition or refurbishment?'. Available at [https://uk-air.defra.gov.uk/assets/documents/reports/cat14/1406191156\\_060618\\_Guide\\_to\\_UK\\_Air\\_Pollution\\_Information\\_Resources-issue\\_2-FINAL.pdf](https://uk-air.defra.gov.uk/assets/documents/reports/cat14/1406191156_060618_Guide_to_UK_Air_Pollution_Information_Resources-issue_2-FINAL.pdf) <https://www.icevirtuallibrary.com/doi/abs/10.1680/udap.2010.163.4.205>

<sup>86</sup> Ipsos MORI (2016): 'Public views of policing in England and Wales'. Available at: <https://www.ipsos.com/sites/default/files/migrations/en-uk/files/Assets/Docs/Publications/sri-public-views-of-policing-in-england-and-wales.pdf>

<sup>87</sup> Office for National Statistics (2018) 'The nature of violent crime in England and Wales: year ending March 2018' Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/thenatureofviolentcrimeinenglandandwales/yearendi-ngmarch2018>

<sup>88</sup> Gov.uk (2019) 'Victims of crime'. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/crime-justice-and-the-law/crime-and-reoffending/victims-of-crime/latest>

<sup>89</sup> Gov.uk (2019) 'Victims of crime'. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/crime-justice-and-the-law/crime-and-reoffending/victims-of-crime/latest>

In addition, the fear of crime is also more prevalent amongst the following groups, and consequently this can have an effect on individual mental health and wellbeing.<sup>90</sup>

- Evidence from Age UK suggests that although older people are generally at a lower risk of crime compared to other ages, they are often more fearful of crime.<sup>91</sup>
- Fear of crime can be an issue for women when they are travelling. Data from the ONS Crime Survey for England and Wales suggests that women fear more for their safety than men when walking alone at night – two fifths of women reported feeling 'somewhat unsafe' and one in eight reported feeling 'very unsafe'.<sup>92</sup>
- A study by Transport for London highlights that ethnic minority individuals are more likely to express concerns over safety and security when travelling (particularly after dark) than white people and are more likely to say that their frequency of travel is affected 'a lot' or 'a little' due to these concerns.<sup>93</sup>
- Research from Stonewall demonstrates that LGBT people often fear for their safety and well-being in public spaces and on pedestrian journeys.<sup>94</sup>

It has been suggested that fear of crime can contribute to social isolation, particularly for vulnerable groups such as children, older people, ethnic minority groups and women.<sup>95</sup>

#### A.1.6 Accessibility and mobility in the surrounding area

Evidence suggests that during construction the accessibility and mobility of the local area can be affected. In particular, construction can cause difficulties in relation to increased traffic in the local area, reducing parking (construction vehicles and subcontractors in parking), the construction activities blocking access to homes, shops, bus stops and pavements and safe routes, as well as effects on wayfinding.

##### Children

Changes in road traffic levels may reduce children's access to community and recreational facilities due to road severance and traffic delays.<sup>96</sup> Increased traffic in proximity to schools, or community facilities that are frequently used by children can also impact their concentration and long-term cognitive development.<sup>97</sup>

##### Disabled people

Research shows that the presence of vehicular traffic can present a barrier for disabled people accessing community resources. National Travel Survey data shows disabled people are generally more likely to experience travel difficulties in the daily trips that they make.<sup>98</sup> Disabled people who travel by car are more likely to report difficulties due to congestion and roadworks, especially where the severity of the disability increases.<sup>99</sup> Short-term change to

transport networks and road alignment can act as a barrier for disabled people wanting to access community facilities, exacerbating issues such as loneliness and social isolation.<sup>100</sup>

##### Older people

Changes to surface transport resulting from renewal of a housing estate may affect how older people interact with community facilities.<sup>101</sup> Older people may find it difficult to access public spaces further away from their home or integrate into new social networks, due to severance caused by increases in road traffic.<sup>102</sup>

#### A.1.7 Information and communication

Complex material and information on the regeneration may present a challenge to those who have different information and communication needs, this includes but is not limited to people with learning disabilities, people with low literacy levels, older people, people with visual or hearing impairments and people who use English as a second language.

Best practice guidance<sup>103</sup> and evidence suggests that the following processes can ensure that information documents are fully accessible to everyone and reduce concerns regarding access to information:

- information should be in short, concise sentences without jargon;
- pictures should be included where possible to support the text;
- the format, layout and length of document should be carefully considered;
- easy read, braille, audio and large print should be provided upon request; and
- information should be translated into people's first language upon request.

## A.2 Impacts on businesses during renewal

### A.2.1 Barriers to reemployment

The renewal programme may result in the closure and relocation of businesses. These changes may create redundancies or result in current staff being unable to access future employment at a different location. The following protected characteristic groups face barriers to employment and are therefore more likely to be affected by loss of existing employment due to business closure or relocation.

##### Older people

Research suggests that those who are older when they are made redundant experience additional barriers to returning to employment, one of these is the potential challenge of

<sup>90</sup> Stafford, M et al. (2006) 'Association between fear of crime and mental health and physical functioning'. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2040373/>

<sup>91</sup> Age UK (2006) 'Crime and fear of crime: help the aged policy statement 2006'. Available at: [https://www.ageuk.org.uk/documents/en-gb/for-professionals/communities-and-inclusion/crime\\_and\\_fear\\_of\\_crime\\_2006\\_pro.pdf?dtrk=true](https://www.ageuk.org.uk/documents/en-gb/for-professionals/communities-and-inclusion/crime_and_fear_of_crime_2006_pro.pdf?dtrk=true)

<sup>92</sup> ONS (2015) Crime Survey for England and Wales. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/crimeinenglandandwales/2015-07-16>

<sup>93</sup> Transport for London (2013) 'Attitudes to Safety and Security – Annual Report'. Available at: <https://tfl.gov.uk/corporate/publications-and-reports/safety-and-security>

<sup>94</sup> Stonewall (2017) LGBT in Britain: Hate Crime. Available at: <https://www.stonewall.org.uk/comeoutforLGBT/qbt-in-britain/hate-crime>

<sup>95</sup> Lorenc, T et al (2013) 'Fear of crime and the environment: systematic review of UK qualitative evidence'. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3666893/>

<sup>96</sup> Hiscock, R. and Mitchell, R (2011) 'What is needed to deliver places that provide good health to children?' Available at: [http://www.edphis.org.uk/Report\\_on\\_Place\\_and\\_Children.pdf](http://www.edphis.org.uk/Report_on_Place_and_Children.pdf)

<sup>97</sup> Institute of Education (2001): 'The effect of travel modes on children's mental health, cognitive and social development: a systematic review'

<sup>98</sup> Department for Transport (2019): 'National Travel Survey: 2018'

<sup>99</sup> Department for Transport (2017) 'Disabled people's travel behaviour and attitudes to travel' Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/647703/disabled-peoples-travel-behaviour-and-attitudes-to-travel.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/647703/disabled-peoples-travel-behaviour-and-attitudes-to-travel.pdf)

<sup>100</sup> Equality and Human Rights Commission (2017): 'Being disabled in Britain: a journey less equal'

<sup>101</sup> DfT (2017): Health impact analysis for the draft Airports National Policy Statement'

<sup>102</sup> NatCen (2019): 'Transport, health and wellbeing: an evidence review for the Department for Transport'

<sup>103</sup> Change (2015): 'how to make information accessible: a guide to producing easy read documents' Available at: [How-to-make-info-accessible-guide-2016-Final \(changepeople.org\)](https://www.changepeople.org/accessible-guide-2016-final) Department for Health and Social Care (2010): 'Making written information easier to understand for people with learning disabilities' Available at: [Making written information easier to understand for people with learning disabilities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/647703/making-written-information-easier-to-understand-for-people-with-learning-disabilities-GOV-UK) MENCAP (date unknown): 'Making myself clear' Available at: [Making-Myself-Clear.pdf \(accessibleinfo.co.uk\)](https://www.mencap.org.uk/info/10486/10486/10486/making_myself_clear)



securing interviews for new positions.<sup>104</sup> According to research by Age UK, once unemployed, only 23% of people aged 50 years or above secure a new job within three months (compared to 35% of 35-49-year olds).<sup>105</sup> Research by Anglia Ruskin University found that older white British men were 22% less likely to be invited for interview when compared to their 28-year-old counterparts, and that that ageism increases for older male ethnic minority applicants and female applicants.<sup>106</sup> These groups may therefore experience disproportionate negative effects as a result of the loss of existing businesses and associated employment.

As **older people** may be more likely to own their own business, they may find relocation much more difficult than other groups. According to ONS data there were 4.6 million self-employed people in the UK at the end of 2015, which was an increase from 3.8 million in 2008; 43% of those were over 50.<sup>107</sup> After the 2008 recession, many older people were made redundant and there was a widely-reported lack of jobs suitable for people over the age of 50,<sup>108</sup> with many finding it difficult to find a new employer. Many took this as an opportunity to start their own businesses. Therefore, older business owners may be more likely to be disproportionately affected by relocation, particularly due to the time it takes to establish and build a customer base in a new location.

Older people, and people from ethnic minority backgrounds may be disproportionately impacted by the potential closure of small businesses, where self-employment is common. Research shows that part-time self-employment is highest among those over the age of 55, and that older people are the fastest growing age group of self-employed people, with those aged over 70 showing the greatest increase of those becoming self-employed out of the total UK workforce between 2001 and 2015.<sup>109</sup>

### Disabled people

According to research from the Equality and Human Rights Commission, disabled people are more likely to experience barriers to employment than non-disabled people. More than a third of disabled people in employment (36 per cent) say that they are limited in the amount or type of work that they do compared with less than a fifth (19 per cent) of non-disabled people. This increases to (66 per cent) for unemployed disabled people who say they are limited in the amount or type of work they could do, compared to 31 per cent of unemployed non-disabled people.<sup>110</sup> This means that disabled people could be disproportionately impacted by loss of employment, particularly if their current working conditions would be difficult to find or replicate elsewhere, or if they have to travel further to work.

### Ethnic minority groups

People from an ethnic minority background may be disproportionately impacted by loss of employment, as they are more likely to experience unemployment and face barriers to employment and social mobility. Research has shown that while educational attainment among people of minority ethnic backgrounds has improved, this has not been reflected in social mobility and job opportunities.<sup>111</sup> People from an ethnic minority background are also more likely to be unemployed. In 2017, just under 4% of White people were unemployed, compared with 8% from all non-White ethnic groups combined. Pakistani and Bangladeshi ethnic groups had the highest rate of unemployment, at 10%.<sup>112</sup>

#### A.1.1 Potential redundancy of employees associated with business loss or relocation

The redevelopment programme may lead to the closure or relocation of some businesses. These changes may create direct redundancies or indirect redundancies as a result in staff being unable to access employment once it has relocated to a new location. Such changes are likely to particularly impact some protected characteristic groups including older people, disabled people and minority ethnic groups.

Research suggests that **older people** who are made redundant face additional barriers to finding new employment compared to the other age groups, especially when attempting to secure interviews for potential new positions.<sup>113</sup> Once unemployed, only 23% of those over the age of 50 gain employment within three months, compared to 35% of 35-49 year olds. Research by Anglia Ruskin University found that older white British men were also 22% less likely to be invited for interview when compared to their 28-year-old counterparts.<sup>114</sup> This suggests that older people who lose their job as a result of the redevelopment may be significantly adversely impacted compared to the general population.

The proportion of **minority ethnic** workforce in the UK is expected to rise to almost 21% by 2051 and this is currently not reflected in the majority of workplaces, with many ethnic minorities concentrated in lower paying jobs.<sup>115</sup> According to the Chartered Institute of Personnel and Development (CIPD) research, people from minority ethnic communities are significantly more likely to say that people's identity or background can have an effect on the opportunities they are given than white British employees.<sup>116</sup> Minority ethnic people are also more likely to say that experiencing discrimination is a problem in their workplace.<sup>117</sup> Research by the Centre of Social Investigation (CSI) also highlights that British employers are more likely to discriminate against job applicants with an ethnic minority background when making hiring decisions.<sup>118</sup> The same CSI study also shows that Black Africans and applicants from the Middle East and North Africa (MENA) countries are more likely to be disproportionately discriminated against, when compared to the applicants of other minority ethnic groups.

<sup>104</sup> Leeds University Business School (2004): 'The Economic and Social Impact of Redundancies from Corus and Allied Steel and Wire in Wales'

<sup>105</sup> Age UK (2013): 'Older Workers at High Redundancy Risk' available at: <https://www.ageuk.org.uk/latest-press/archive/older-workers-at-high-redundancy-risk/>

<sup>106</sup> The Prince's Responsible Business Network (2017). 'Factsheet: Why employers need to tackle ageism in redundancy and recruitment processes.' Available at: [https://age.bitc.org.uk/sites/default/files/business\\_in\\_the\\_community\\_factsheet\\_-\\_tackling\\_age\\_bias\\_in\\_processes.pdf](https://age.bitc.org.uk/sites/default/files/business_in_the_community_factsheet_-_tackling_age_bias_in_processes.pdf)

<sup>107</sup> Chartered Institute of Personnel and Development (2018): Megatrends

<sup>108</sup> Chartered Institute of Personnel and Development (2018): Megatrends

<sup>109</sup> Institute of Directors (2017) 'The Age of the Older Entrepreneur'. Available at: <https://www.iod.com/Portals/0/PDFs/Campaigns%20and%20Reports/Start%20ups/Older-Entrepreneur-Report-loD.pdf>

<sup>110</sup> Equality and Human Rights Commission (2013). *Barriers to unemployment and unfair treatment at work: a quantitative analysis of disabled people's experiences*. Available at: <https://www.equalityhumanrights.com/sites/default/files/research-report-88-barriers-to-employment-and-unfair-treatment-at-work-disabled-peoples-experiences.pdf>

<sup>111</sup> Brown, L., Heath, A., Li, Y., & Nazroo, J. (2013). *Addressing ethnic inequalities in social mobility: research findings from the CoDE and Cumberland Lodge policy workshop*. Available at: <http://hummedia.manchester.ac.uk/institutes/code/briefings/policy/code-social-mobility-briefing-Jun2014.pdf>

<sup>112</sup> Annual population survey (2018). 'Ethnicity facts and figures: Unemployment'

<sup>113</sup> Centre for Aging Better (2020): 'Supporting Over 50s back to work' Available at: [supporting-over-50s-back-to-work.pdf](https://supporting-over-50s-back-to-work.pdf) (ageing-better.org.uk)

<sup>114</sup> Age UK (2013): 'Older Workers at High Redundancy Risk'

<sup>115</sup> The McGregor-Smith Review (2017): 'Race in the workplace' Available at: [Race in the workplace: The McGregor-Smith review](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/641117/race-in-the-workplace-the-mcgregor-smith-review.pdf) (publishing.service.gov.uk)

<sup>116</sup> CIPD (2017): 'Addressing the barriers to BAME employee career progression to the top' Available at: [\\*addressing-the-barriers-to-BAME-employee-career-progression-to-the-top\\_tcm18-333336.pdf](https://www.cipd.co.uk/media/1833336/addressing-the-barriers-to-bame-employee-career-progression-to-the-top-tcm18-333336.pdf) (cipd.co.uk)

<sup>117</sup> CIPD (2017): 'Addressing the barriers to BAME employee career progression to the top' Available at: [\\*addressing-the-barriers-to-BAME-employee-career-progression-to-the-top\\_tcm18-333336.pdf](https://www.cipd.co.uk/media/1833336/addressing-the-barriers-to-bame-employee-career-progression-to-the-top-tcm18-333336.pdf) (cipd.co.uk)

<sup>118</sup> CSI (2019): 'Are employers in Britain discriminating against ethnic minorities?' Available at: [Are employers in Britain discriminating against ethnic minorities?\\_final.pdf](https://www.ox.ac.uk/files/1234/are-employers-in-britain-discriminating-against-ethnic-minorities-final.pdf) (ox.ac.uk)

## A.2.2 Impact of redundancy on health and well-being

### Older people

Involuntary job loss due to redevelopment may have disproportionate health effects for older workers. Older workers are at an increased risk of cardiovascular disease due to increased stress resulting from contributing factors such as a lower likelihood of re-employment, a substantial loss of income and the severance of work-based social interactions.<sup>119</sup>

### Children

Involuntary redundancy may also disproportionately impact the wellbeing of children. Research has shown that redundancy can create an increased risk of family tension and disruption, and that job loss can have detrimental effects on children including lowered self-esteem and socio-psychological well-being.<sup>120</sup> This is, in turn, is connected to effects on children's education attainment. Studies have shown that effects of parental redundancy on children including higher likelihood of grade repetition, dropout, suspension or expulsion from school, lower educational attainment and lower income of children in adulthood.<sup>121</sup>

## A.2.3 Access to commercial finance

Renewal may result in effects on trade, relocation or closure. This may result in a need to access finance, which can be more difficult for particular groups

For businesses, redevelopment and renewal may result in relocation or closure. This may result in a need to access finance to secure new premises.

### Ethnic minority groups

Research indicates that businesses owned by members of some ethnic groups are more likely to be denied a loan outright in comparison to White-owned businesses. Black African owned businesses are four times more likely to be denied a loan outright, Black Caribbean-owned businesses are three and a half times more likely, Bangladeshi-owned businesses are two and a half times more likely, and Pakistani-owned businesses are one and a half times more likely. This suggests that ethnic minority-owned businesses tend to experience greater difficulties in securing financial support, which could be detrimental where redevelopment results in a reduction in affordable commercial premises.<sup>122</sup>

## A.2.4 Impacts on customer base

With the announcement of demolition, local businesses and community facilities may relocate. Such relocation may impact the customer base that businesses have accumulated from the local area should the new business premises be further afield from existing customers.

Research suggests that **older people** may find it harder to access services and amenities that are located further away. For **disabled people**, especially those who have mobility impairments, the relocation or closure of businesses can reduce accessibility to services and amenities which they rely on, potentially increasing social isolation and the likelihood of negative mental health outcomes. People belonging to **minority ethnic groups** may also be more reliant on existing networks and links with local infrastructure when compared to other ethnic groups.

## A.3 Impact on community following renewal process

### A.3.1 Tackling crime and disorder

Levels of crime have in part be attributed to the urban environment. Using theoretical approaches such as Rational Choice Theory<sup>123</sup> and Broken Windows Theory,<sup>124</sup> a strong argument has developed which links the design of neighbourhoods and towns to levels of crime and disorder.<sup>125</sup> It has been argued that the opportunity for some forms of crime can be reduced through better thought-out approaches to planning and design of neighbourhoods and towns. For example, concepts such as Crime Prevention Through Environmental Design (CPTED)<sup>126</sup> are more frequently used today to ensure buildings and public spaces are designed in a way that aims to reduce the occurrence of crime and alter the environmental factors that might encourage criminal behaviour. Indeed, evidence suggests that homes built to 'Secured by Design' principles can reduce burglary and crime rates by up to 75%.<sup>127</sup>

### Children, young people, older people, disabled people, ethnic minority groups, men, women and LGBT people

Changes to the urban environment that affect crime and disorder can impact on those who are more likely to be a victim or witness of crime, including young people, disabled people, people from ethnic minority backgrounds, men and LGBT people. Changes may also affect those who are likely to be adversely impacted by fear of crime, including children, older people, ethnic minority groups, women and LGBT people.

### A.3.2 Improved access, mobility and navigation

Aging and being disabled can lead to a decline in physical or cognitive functions, resulting in decreased social activity and narrowing of social networks.<sup>128</sup> Leisure activities are considered to be effective mediators between social relationships and wellbeing of **older people** and **disabled people**. This is because leisure is scientifically proven to help people overcome their stress resulting from a chronic condition or negative life event. Leisure activities provide disabled and old people with social support, and further mediate their stress-health relationship. Availability of leisure services and facilities could therefore benefit older and disabled people, who are in a greater need for social interaction than the general population.<sup>129</sup>

<sup>119</sup> Gallo, W. T., Bradley, E. H., Falba, T. A., Dubin, J. A., Cramer, L. D., Bogardus Jr, S. T., & Kasl, S. V. (2004). 'Involuntary job loss as a risk factor for subsequent myocardial infarction and stroke: findings from the Health and Retirement Survey'. American journal of industrial medicine, 45(5), 408-416. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1351254/pdf/nihms-6175.pdf>

<sup>120</sup> Brand, J. E. (2015). 'The far-reaching impact of job loss and unemployment'. Annual review of sociology, 41, 359-375. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4553243/>

<sup>121</sup> Brand, J. E. (2015). 'The far-reaching impact of job loss and unemployment'. Annual review of sociology, 41, 359-375. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4553243/>

<sup>122</sup> Enterprise Research Centre (2013): 'Diversity and SMEs'. Available at: <https://www.enterpriseresearch.ac.uk/wp-content/uploads/2013/12/ERC-White-Paper-No-3-Diversity-final.pdf>

<sup>123</sup> Felson and Clarke (1998) 'Opportunity Makes the Thief, Practical Theory of Crime Prevention'. Available at: <https://pdfs.semanticscholar.org/09db/dbce90b22357d58671c41a50c8c2f5dc1cf0.pdf>

<sup>124</sup> Wilson and Kelling (1982) 'Broken Windows: The police and neighbourhood safety'. Available at: <https://www.theatlantic.com/magazine/archive/1982/03/broken-windows/304465/>

<sup>125</sup> See for example, Monahan and Gemmell (2015) 'Reducing Crime Hotspots in City Centres'. Available at: <http://www.bre.co.uk/filelibrary/Briefing%20papers/102417-Crime-Hotspots-Briefing-Paper-v4.pdf>

<sup>126</sup> Jeffery (1971) 'Crime Prevention Through Environmental Design'. Sage publications

<sup>127</sup> Secured by Design (2014) 'Secured by Design: Reducing crime by good design'. Available at: <https://mbp.co.uk/wp-content/uploads/2017/06/Secured-by-Design-Reducing-Crime-by-Good-Design-reduced.pdf>

<sup>128</sup> Wray et al. (2014): 'Social relationships, leisure activity and health in older adults' Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4467537/>

<sup>129</sup> Liu et al. (2018): 'Social interaction patterns of the disabled people in asymmetric social dilemmas' Available at: <https://www.frontiersin.org/articles/10.3389/fpsyg.2018.01683/full>

### A.3.3 Improve public realm and green space

The ability to access and use the public realm is vitally important to ensuring people feel that they are active members of their society. This includes basic activities such as using local shops or meeting up with people in a shared space outside close to home.<sup>130</sup>

However, it has been acknowledged that **disabled people** and **ethnic minority** communities are less likely to take part in public life than other sections of the population.<sup>131</sup> For disabled people, public spaces can often be inaccessible. The presence of vehicular traffic and lack of accessible design (such as the use of appropriate paving and lighting) can present a barrier to using outdoor, shared public spaces.<sup>132</sup> And, evidence suggests that in areas where over 40% of residents are ethnic minority, there is 11 times less green space when compared to areas where residents are largely White.<sup>133</sup>

The inclusion of community gardens and other public green spaces through redevelopment can also benefit **older people, children, and disabled people**. Research reports that interaction with nature or gardening can improve attentional functioning for children who have Attention Deficit Hyperactivity Disorder (ADD) and can also reduce stress levels and improve self-esteem for children. Such inclusion can also improve self-identity and a sense of purpose for those with dementia, and can generally improve social interaction, social mixing, and community building.<sup>134</sup>

Better access to, and management of, the public realm is also important to the provision of play space for children. When children are able to play in an outdoor environment, they tend to be more active which supports positive mental health and wellbeing.

#### Disabled people

Research into the health benefits of urban green space has found that it can positively impact both physical and mental health. With physical health, a UK study found that those who live within 500 meters of accessible green space are 24% more likely to take part in 30 minutes of physical activity daily. In terms of mental health, green space can provide areas that encourage social interaction and integration and can indirectly benefit the wellbeing of users.<sup>135</sup>

#### Ethnic minority

Research has found that in urban areas ethnic minority groups tend to have less access to local green space, and the space they can access is often of poor quality. For example, in the UK, wards that have an ethnic minority population of less than 2% have six times as much green space as wards where the ethnic minority population is over 40%.<sup>136</sup> The provision of green space is therefore likely to benefit this group.

#### Children

Children are likely to benefit from urban green space. Research carried out by UCL highlighted that urban green space can have a positive role in a child's cognitive functioning. The study

found that children who lived in areas with more green space outperformed those from areas with less green space.<sup>137</sup> Exposure to green space is also important for a child's wellbeing and healthy development. However, children living in London can experience barriers in access to green space compared to the rest of the UK. This is due to the high population densities, deficiencies in green space and poor access to private gardens that are characteristic of London.<sup>138</sup>

The presence of urban green space also presents an opportunity to incorporate play space into regeneration schemes. Research by Play England has highlighted the benefits of play to children, and how play is central to a child's physical, psychological and social wellbeing. Play space can enable children to form friendships, interact with others and feel part of a group, something that is important to levels of self-esteem. Play space can also encourage children to have familiarity with an area and identify as part of a community. Lastly, ensuring that outdoor play space is fun and enjoyable for children is a key motivator for physical activity and exercise.<sup>139</sup>

#### Older people

Urban green space may also benefit older people. Evidence suggests that inner-city green space can promote social cohesion and instil a sense of community. Social contact is especially important for the health and wellbeing of older people as social isolation has been linked to poor health and increased mortality rates.<sup>140</sup>

However, in order to ensure the best outcomes, the design and maintenance of green space is important. Well designed and maintained spaces that have attractive green areas and planted vegetation are perceived as safer and more 'walkable'. If green space is not maintained and becomes littered and derelict, the appeal of the green space decreases and anti-social behaviour can occur.<sup>141</sup> Evidence shows that safety of urban green space is particularly important to women and ethnic minority individuals. These groups may perceive themselves as vulnerable when visiting urban green spaces due to previous experiences of victimisation or harassment. Such experiences can result in these groups feeling fearful of urban green space.<sup>142</sup>

Overall, the provision and maintenance of green spaces in urban areas can make an important contribution to the health and wellbeing of several groups, specifically ethnic minority, children and older people. However, such space must be appropriately managed and maintained to ensure positive outcomes, and so that users (particularly women and ethnic minority individuals) feel safe.

### A.3.4 Provision of community resource and improved social cohesion

community resources provide important places of social connection and promote wellbeing for **children, older people, disabled people, people from an ethnic minority background and pregnant women**. Regeneration of areas can include both continued access to and the creation

<sup>130</sup> House of Commons Women and Equalities Committee (2017): 'Building for Equality: Disability and the Built Environment'.

<sup>131</sup> Greater London Authority (2017): 'The Mayor's vision for a diverse and inclusive city: Draft for consultation'.

<sup>132</sup> House of Commons Women and Equalities Committee (2017): 'Building for Equality: Disability and the Built Environment'.

<sup>133</sup> CABE (2016): 'Community green: using local spaces to tackle inequality and improve health'.

<sup>134</sup> Maheshwari, S. (2017). 'Food in the City: Review of Psychological Impact of Growing Food in Urban Spaces'. *Journal of Innovation for Inclusive Development*, 2(1), 36-43.

<sup>135</sup> Houses of Parliament, Parliamentary Office of Science & Technology (2016): 'Green Space and Health'. Available at:

<https://www.ethnicity-facts-figures.service.gov.uk/housing/housing-conditions/fuel-poverty/latest>

<http://researchbriefings.files.parliament.uk/documents/POST-PN-0538/POST-PN-0538.pdf>

<sup>136</sup> Commission for Architecture and the Built Environment (2010): 'Community green: Using local spaces to tackle inequality and improve health'. Available at: <https://www.designcouncil.org.uk/sites/default/files/asset/document/community-green-full-report.pdf>

<sup>137</sup> UCL (2018): 'Greener neighbourhoods may be good for children's brains'. Available at:

<https://www.ucl.ac.uk/oe/news/2018/sep/greener-neighbourhoods-may-be-good-childrens-brains>

<sup>138</sup> London Sustainable Development Commission (2011): 'Sowing the seeds: Reconnecting London's children with nature'. Available at:

[https://www.london.gov.uk/sites/default/files/lscdc\\_-\\_sowing\\_the\\_seeds\\_-\\_full\\_report\\_2011.pdf](https://www.london.gov.uk/sites/default/files/lscdc_-_sowing_the_seeds_-_full_report_2011.pdf)

<sup>139</sup> Play England (2012): 'A literature review on the effects of a lack of play on children's lives'. Available at:

<http://www.playengland.net/wp-content/uploads/2015/09/a-world-without-play-literature-review-2012.pdf>

<sup>140</sup> World Health Organisation (2016): 'Urban green spaces and health, a review of evidence'. Available at:

[http://www.euro.who.int/\\_data/assets/pdf\\_file/0005/321971/Urban-green-spaces-and-health-review-evidence.pdf?ua=1](http://www.euro.who.int/_data/assets/pdf_file/0005/321971/Urban-green-spaces-and-health-review-evidence.pdf?ua=1)

<sup>141</sup> Houses of Parliament, Parliamentary Office of Science & Technology (2016): 'Green Space and Health'. Available at:

<http://researchbriefings.files.parliament.uk/documents/POST-PN-0538/POST-PN-0538.pdf>

<sup>142</sup> World Health Organisation (2016): 'Urban green spaces and health, a review of evidence'. Available at:

[http://www.euro.who.int/\\_data/assets/pdf\\_file/0005/321971/Urban-green-spaces-and-health-review-evidence.pdf?ua=1](http://www.euro.who.int/_data/assets/pdf_file/0005/321971/Urban-green-spaces-and-health-review-evidence.pdf?ua=1)

of community resources, improving social cohesion and community relations. This can impact on all parts of the community, but can have a disproportionate effect on the above groups

Improved provision of affordable and accessible facilities for sports and physical activity would positively impact groups that often face barriers to participation, including older people, disabled people, ethnic minority communities, and those who identify as LGBT.<sup>143</sup>

### A.3.5 New employment opportunities

Renewal and regeneration where done effectively can act as a means of promoting economic growth and supporting job creation.<sup>144</sup> For example, property development can contribute to urban economic regeneration through the enabling of local stores to grow and expand, and through attracting investment to the area and revitalising neighbourhoods. It can also facilitate improved connectivity between communities and places of employment and education. Improved opportunities to access employment and education can serve to help address issues of inequality and improve social mobility, this may particularly benefit the protected characteristic groups who are more likely to face barriers to employment. These groups include older people, disabled people, and those from an ethnic minority background.

New opportunities may also positively affect other protected characteristics groups who are more likely to face unemployment, including young people and women. Statistics released in 2018 have shown that for the first time since the 1980s, British women are more likely to be unemployed than men. For young people, amongst those aged 16-24, 11.2% are Not in Education, Employment or Training (NEET). Recent unemployment statistics for the UK show that young people are around four times more likely to be unemployed than their adult counterparts aged 25-64.<sup>145</sup>

### A.3.6 Improved housing provision

Regeneration can lead to the relocation of residents. Whilst negative effects can arise as a result of relocation, positive effects may also arise. This is particularly likely to be the case should residents move to an area with more green space, and better air quality. Groups that are susceptible to air pollution (see section A.1.4), and may therefore benefit from relocation, include children, older people, disabled people and those who are pregnant.

Section 3.3.3 outlines the importance of appropriate, accessible and affordable housing for particular protected characteristic groups, including children, disabled people, and people from an ethnic minority background. The regeneration of the area will improve the housing provision in the local areas increasing capacity and quality. This can affect all parts of the community but can have a disproportionate effect on the above groups.

#### Children and older people

Through redevelopment, homes can be re-provided to a high standard, including better sound proofing and lower energy costs and consumption levels.<sup>146</sup> With regard to noise, reduced levels due to redevelopment can disproportionately impact children and older people.

With regard to insulation, the Decent Homes Standard (DHS) requires local authorities to make sure all social housing provides a reasonable degree of thermal comfort to its residents. This includes ensuring efficient heating is provided with use of minimum insulation levels. However, the DHS does not require local authorities to ensure all social housing is heated affordably, and therefore does not always automatically serve to address issues such as fuel poverty.<sup>147</sup>

Fuel poverty and cold housing can have several detrimental effects on individual's physical and mental health. Children living in cold homes are more than twice as likely to suffer from a variety of respiratory problems than children living in warm homes. Cold housing can negatively impact children's educational attainment, emotional wellbeing and resilience.<sup>148</sup>

Effects of cold housing are also evident among older people in terms of higher mortality risk, physical health and mental health. Older people spend on average 80% of their time at home, making them more susceptible to cold or damp related health problems. Cold temperatures can increase the levels of minor illnesses such as colds and flu, contribute towards excess winter deaths, negatively affect mental health, and exacerbate existing conditions such as arthritis and rheumatism.<sup>149</sup>

#### Disabled people

Research from disability charity Scope evidences that long term impairments or conditions have a significant impact on energy costs, with many disabled people consuming more energy because of their impairment or condition. In particular those with limited mobility report having to use more heating to stay warm.<sup>150</sup>

#### People from an ethnic minority background

In England, fuel poverty is more common with ethnic minority households when compared to White households.<sup>151</sup> Data shows that in 2015, 16% of ethnic minority households were living in fuel poverty compared to 10% of White households.<sup>152</sup>

<sup>143</sup> Assembly, N. I. (2010). 'Barriers to Sports and Physical Activity Participation'.

<sup>144</sup> Communities and Local Government (2012) 'Regeneration to enable growth: A toolkit supporting community-led regeneration'. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/5983/2064899.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/5983/2064899.pdf)

<sup>145</sup> UK Government (2018) 'Unemployment'. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/work-pay-and-benefits/unemployment-and-economic-inactivity/unemployment/latest>

<sup>146</sup> City of Westminster Council (2018): 'My Ebury: Shaping the preferred scenario'.

<sup>147</sup> Centre for Sustainable Energy (2006): 'Tackling fuel poverty at local and regional level: opportunities to deliver action and policies to stimulate success'. Available at: [https://www.cse.org.uk/downloads/reports-and-publications/fuel-poverty/tackling\\_fuel\\_poverty\\_at\\_local\\_and\\_regional\\_level.pdf](https://www.cse.org.uk/downloads/reports-and-publications/fuel-poverty/tackling_fuel_poverty_at_local_and_regional_level.pdf)

<sup>148</sup> Marmot Review Team (2011) 'The Health Impacts of Cold Homes and Fuel Poverty'. London: Department of Epidemiology and Public Health, University College London.

<sup>149</sup> The Housing and Ageing Alliance (2013) 'Policy Paper: Health, Housing and Ageing', Available at [www.housingalliance.org/HAA/](http://www.housingalliance.org/HAA/)

<sup>150</sup> Scope (2018) 'Out in the Cold', Available at <https://www.scope.org.uk/Scope/media/images/Out-in-the-cold.pdf>

<sup>151</sup> This does not include White ethnic minority households.

<sup>152</sup> Department for Business, Energy and Industrial Strategy (2017): 'Ethnicity facts and figures: Fuel poverty'. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/housing/housing-conditions/fuel-poverty/latest>

## B. Area profile and proportionality

This appendix is split into three sections. Section A.1 provides an overview of the socio-demographic profile of the Estate (the study area outlined in Chapter 2). An overview of community resources is provided in Section A.2. Section A.3 provides the results of socio-demographic monitoring for the area which has been collated through a review of the Starting the Conversation questionnaire administered by Southwark Council.

### B.1 Socio-demographic profile of the area

The area profile below provides a wider contextual demographic characterisation of the area in which the Estate falls. The data includes the current social and economic context of the area and relevant comparators, namely the London Borough of Southwark, the Greater London region, and England. In comparing these regions, where the Estate deviates by more than 3%, the difference is considered to be significant and is reported as such.

The demographic data<sup>153</sup> has been sourced from publicly available data and only applies to the resident population.

#### Age

The tables and figures below show the population for key age groups within the Estate and the above comparator areas. The figures show both the proportion and density of each age group within the different areas.

#### Children (under 16 years)

The table below indicates that the proportion of people under the age of 16 on the Estate is broadly in line with Southwark, Greater London, and England (18% compared with 19%, 21% and 19% respectively).

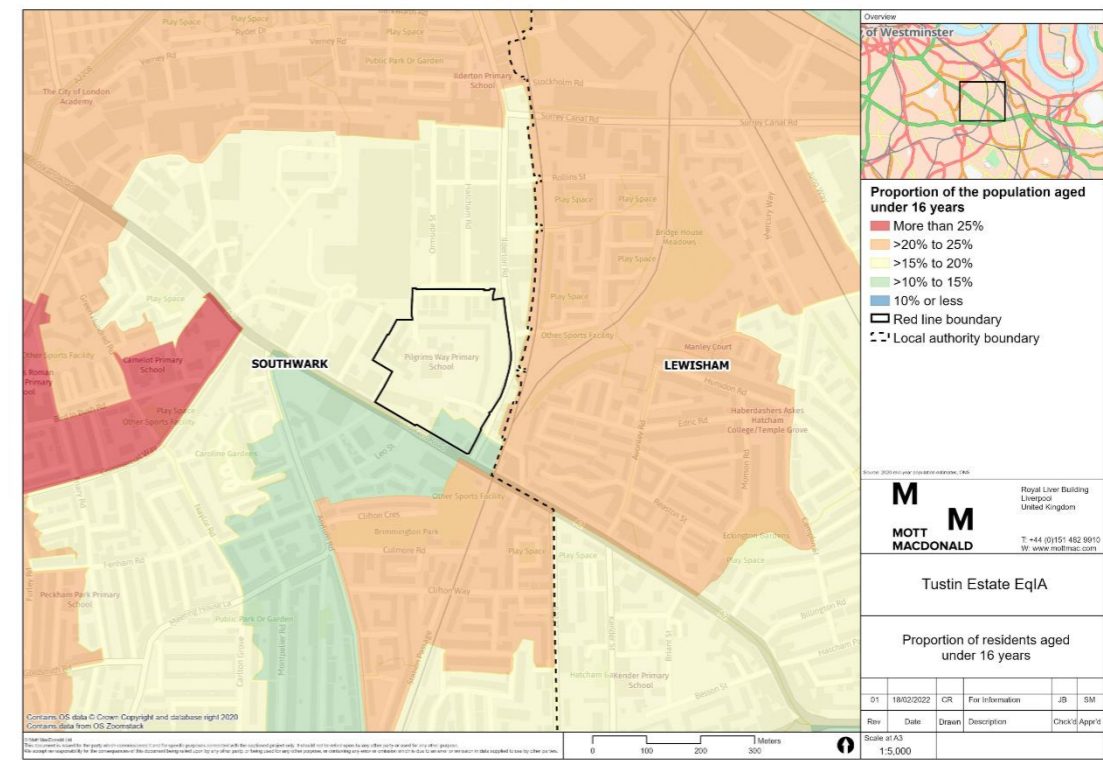
**Table B.1: Children (under 16 years)**

Location	Total population, 2020	Children (under 16 years)	%
Estate	1,190	211	18%
Southwark	320,017	60,065	19%
Greater London	9,002,488	1,853,207	21%
England	56,550,138	10,852,240	19%

Source: ONS 2020 mid-year population estimates

The following figure, Map A.1, illustrates that the proportion of children within the Estate ranges between 11% to 20% of the population; lower than most surrounding areas but higher than the area south of the Estate

**Map B.1: Proportion of children under 16 within the Estate**

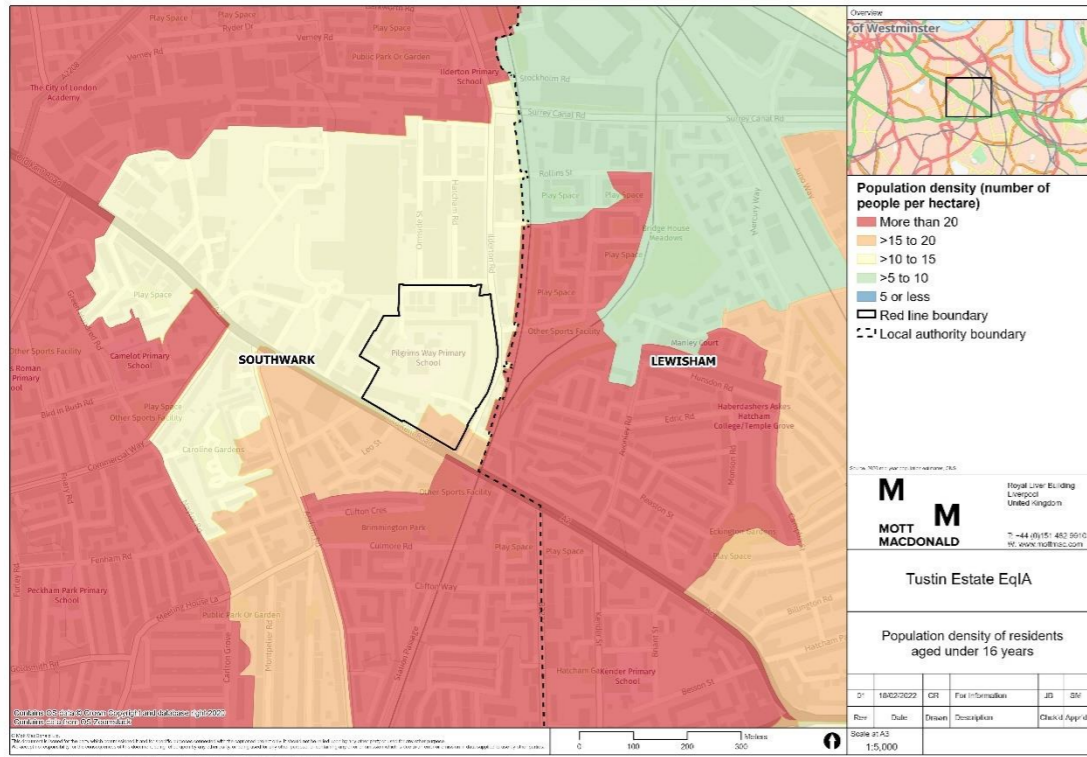


Source: Mott MacDonald

<sup>153</sup> In order to calculate statistics for the Estate, codepoint data was used, which includes a point representing each postcode area. Lower Super Output (LSOA) data is shared between the codepoints that fall within each LSOA, and is summed up for where the codepoints fall within the Estate.

Map A.2, below, illustrates that the density of children within the Estate is lower than most of the surrounding areas, with a density of 11 to 15 children per hectare through most of the Estate.

**Map B.2: Population density of children under 16 within the Estate**



Source: Mott MacDonald

**Young people (16-24 years)**

Table A.2 shows that the proportion of young people aged 16-24 within the Estate (10%) is broadly in line with Southwark, Greater London and England (11%, 10% and 11% respectively).

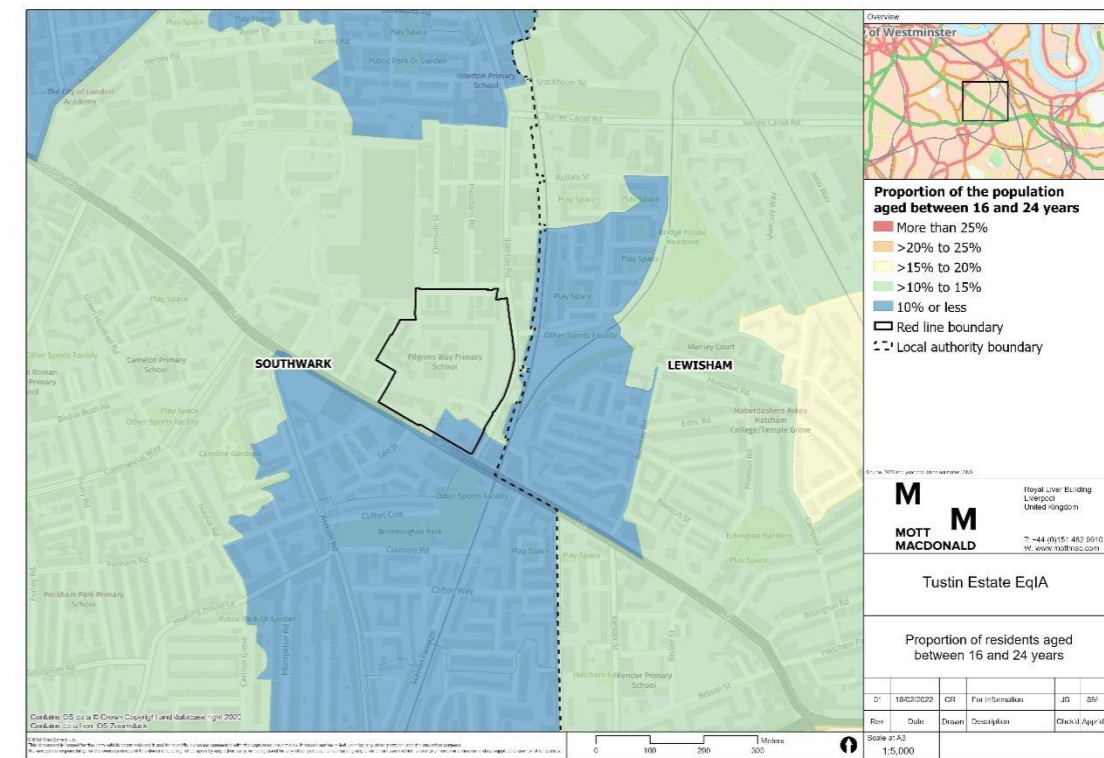
**Table B.2: Young people (16-24 years)**

Location	Total population, 2020	Young people (16-24 years)	%
Estate	1,190	118	10%
Southwark	320,017	33,947	11%
Greater London	9,002,488	930,728	10%
England	56,550,138	5,950,637	11%

Source: Office of National Statistics (2020) Mid- year population estimates

Map A.3, below, demonstrates that proportions of young people aged 16-24 within the Estate are less than 15% across the Estate. This is broadly in line with most of the surrounding areas, with slightly lower proportions to the north and south.

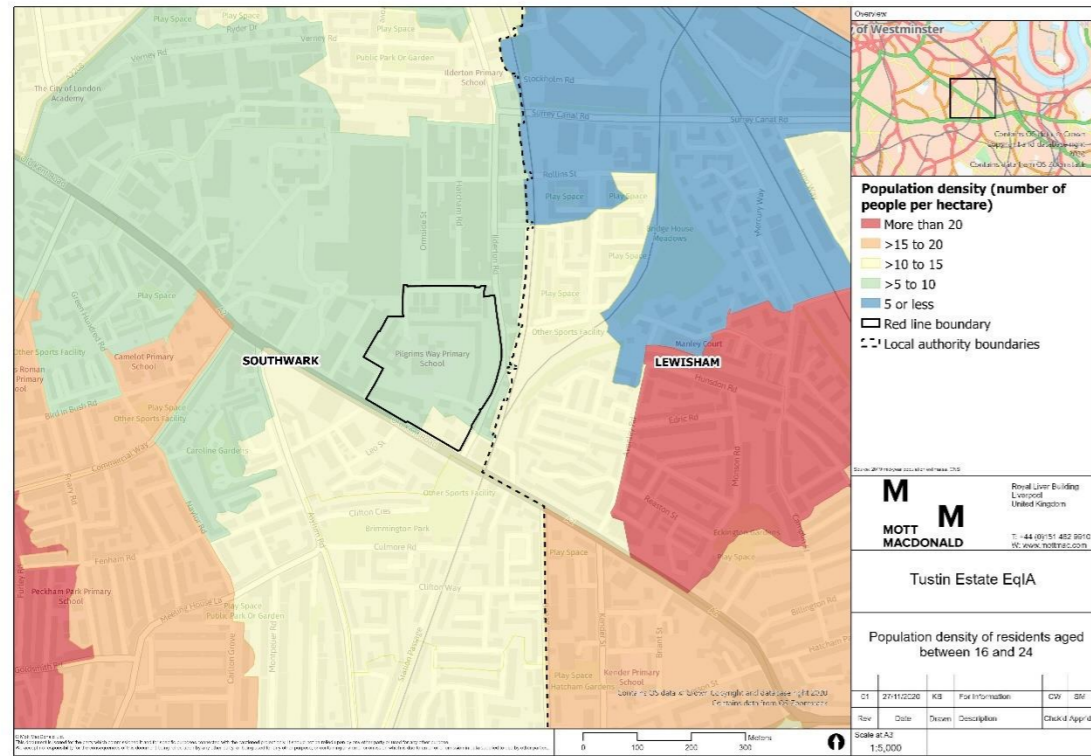
**Map B.3: Proportion of young people aged 16-24 within the Estate**



Source: Mott MacDonald

Map A.4 illustrates that there are lower population densities of young people aged 16-24 across the Estate when compared to surrounding areas, with approximately 6 to 10 young people per hectare across the estate.

**Map B.4: Population density of young people aged 16-24 within the Estate**



Source: Mott MacDonald

**Working aged people (16- 64)**

The percentage of working age people (aged between 16 and 64) on the Estate (71%) is broadly in line with that of Southwark (73%) but higher than Greater London and England (67% and 62% respectively).

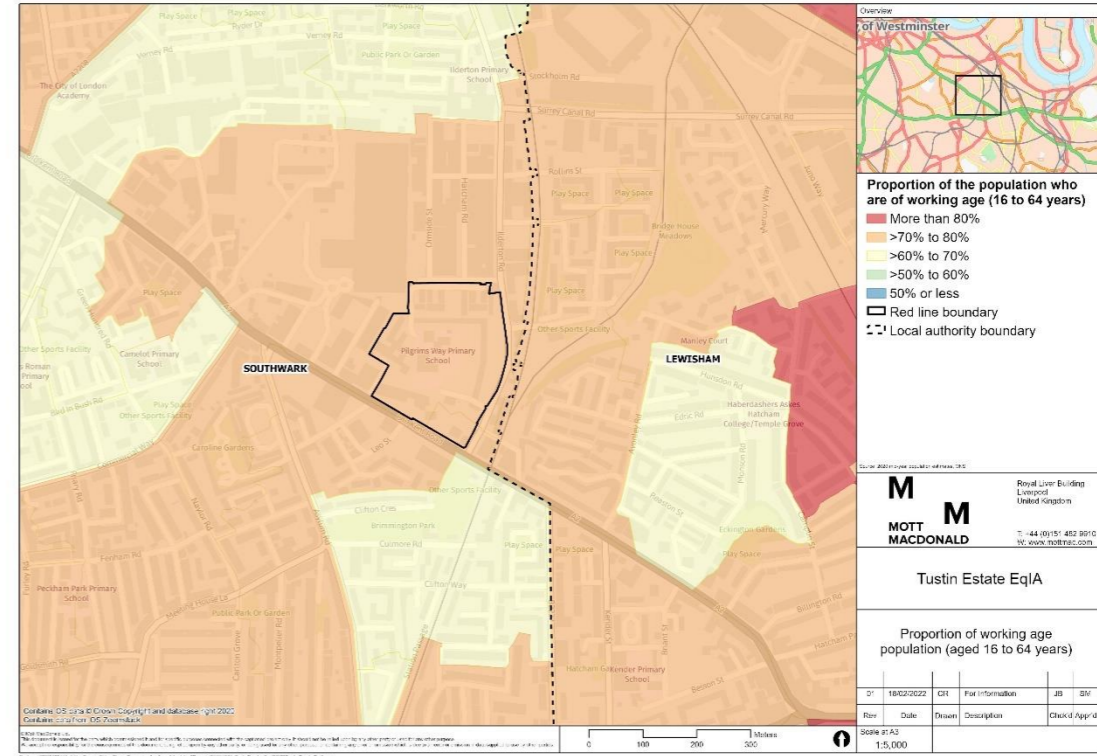
**Table B.3: Working age population**

Location	Total population, 2019	Working age population	%
Estate	1,190	844	71%
Southwark	320,017	232,014	73%
Greater London	9,002,488	6,050,828	67%
England	56,550,138	35,233,879	62%

Source: ONS 2020 mid-year population estimates and 2011 Census

Map B.5, below, demonstrates that the proportion of working age residents on the Estate is between 71% and 80%, in line with most surrounding areas.

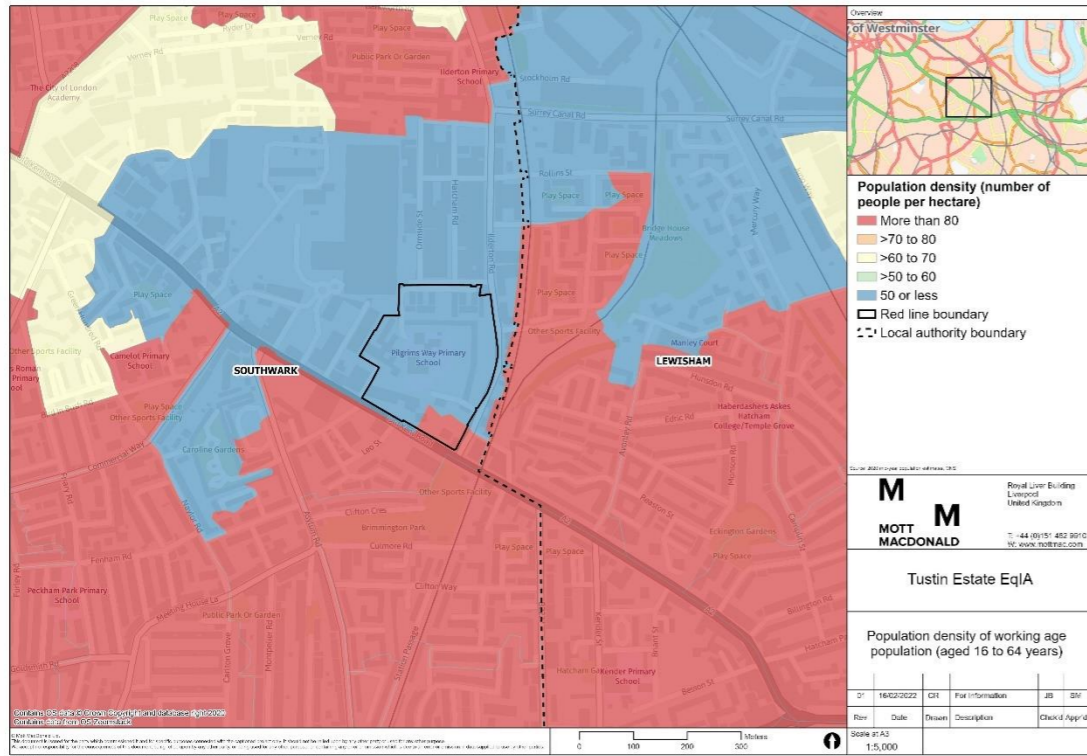
**Map B.5: Proportion of residents aged between 16 and 64.**



Source: Mott MacDonald

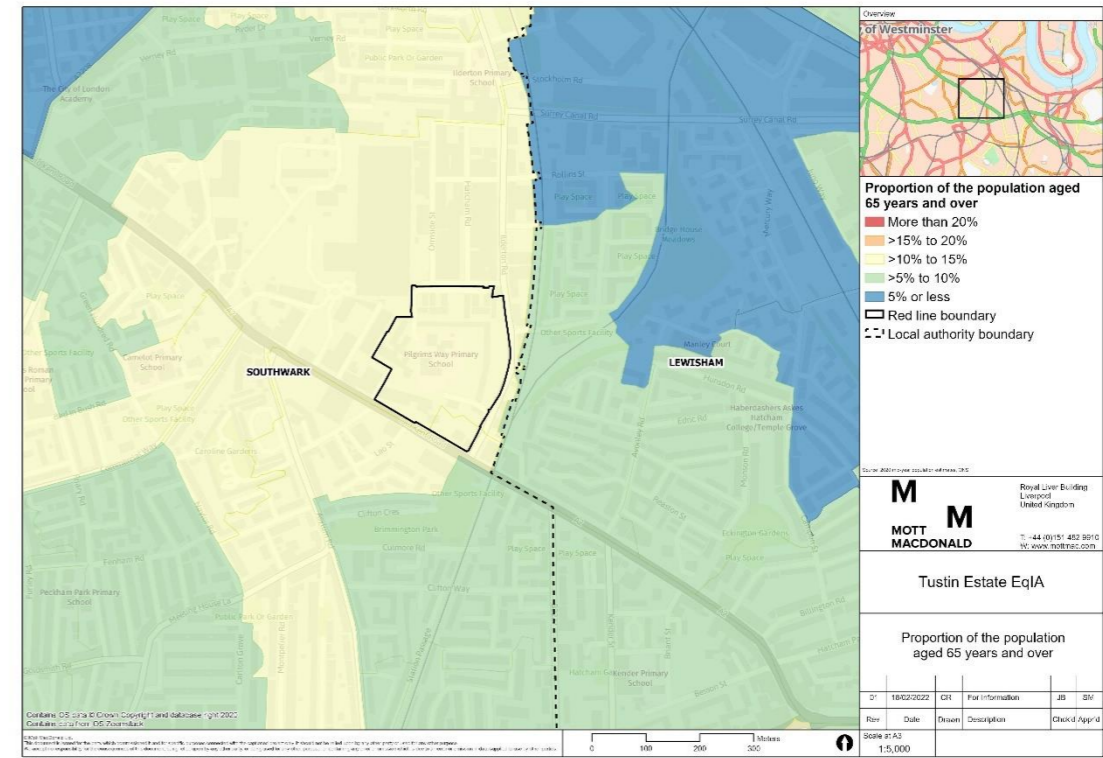
Map A.6, demonstrates that there is a lower density of working age people on the Estate when compared to surrounding areas. Most of the Estate has a density of less than 50 working age people per hectare. However, in a small area in the south east this density rises to more than 80 working age people per hectare.

**Map B.6: Population density of working age people**



Source: Mott MacDonald

Map B.7: Proportion of residents aged 65 and over



Source: Mott MacDonald

Older people (over 65 years)

The percentage of older people over 65 years within the Estate (11%) is broadly in line with Southwark and Greater London (9% and 12% respectively), but significantly lower than England as a whole (18%).

Table B.4: Older people (65+ years)

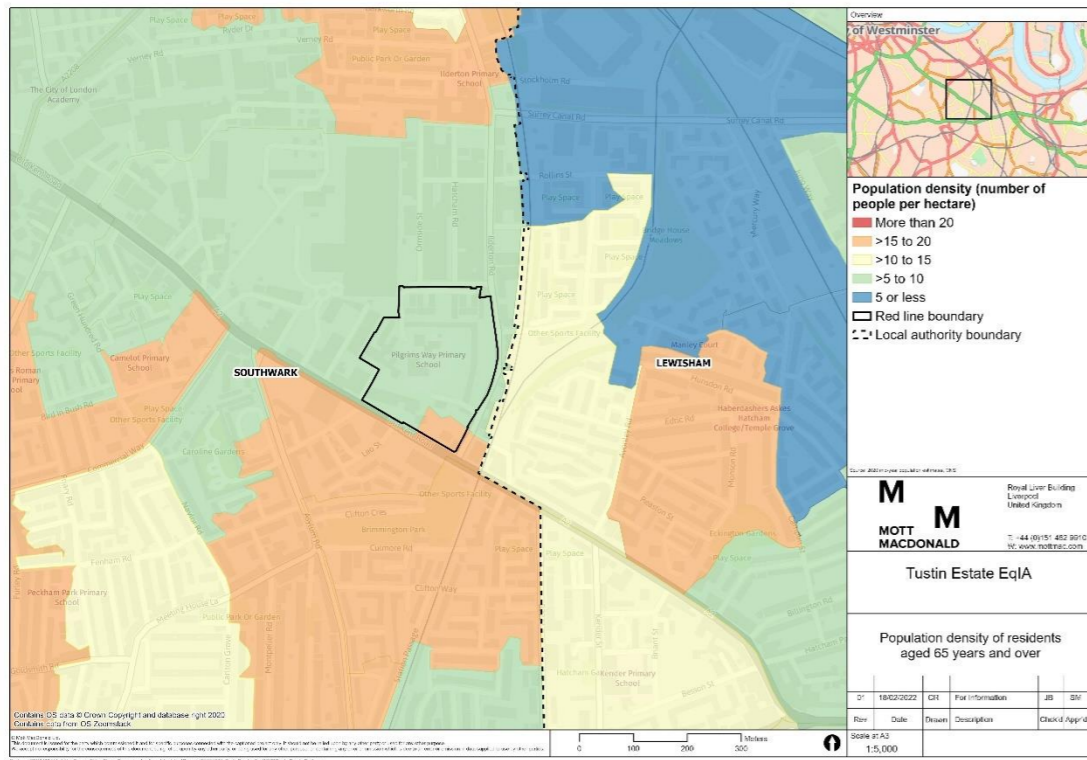
Location	Total population, 2020	Older people (65+ years)	%
Estate	1,190	135	11%
Southwark	320,017	27,938	9%
Greater London	9,002,488	1,098,453	12%
England	56,550,138	10,464,019	18%

Source: Office for National Statistics (2020) Mid- year population estimate

Map A.7, below, demonstrates that that proportions of older people over 65 years within the Estate, ranging between 11% and 15%, is in line with the proportion of older people living in the areas immediately surrounding the Estate.



Map B.8: Population density of people aged over 65 years



Source: Mott MacDonald

Disabled people

The table below shows the proportion of disabled people living in the Estate, Southwark, Greater London, and England.

There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Southwark and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). People in existing poor health with long-term conditions that limit their day-to-day activities may be more sensitive to changes such as increased air pollutants from construction.

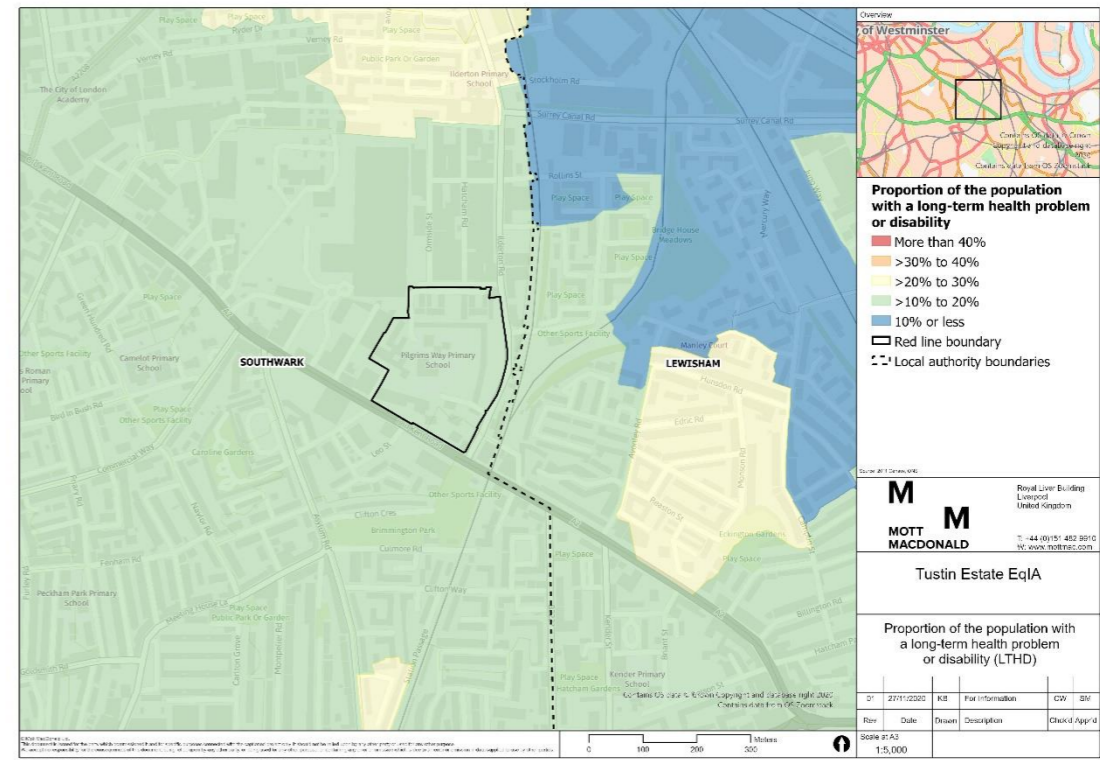
Table B.5: Population with a long-term health problem or disability limiting day-to-day activities

Disability	Estate	Southwark	Greater London	England
Limited a lot	8%	7%	7%	8%
Limited a little	9%	7%	7%	9%
Not limited	84%	86%	86%	82%

Source: Office of National Statistics (2011) Census data

Map A.9, below, shows that the proportion of people in the Estate living with a long-term health condition or disability ranges from 11% to 20%, broadly in line with most surrounding areas.

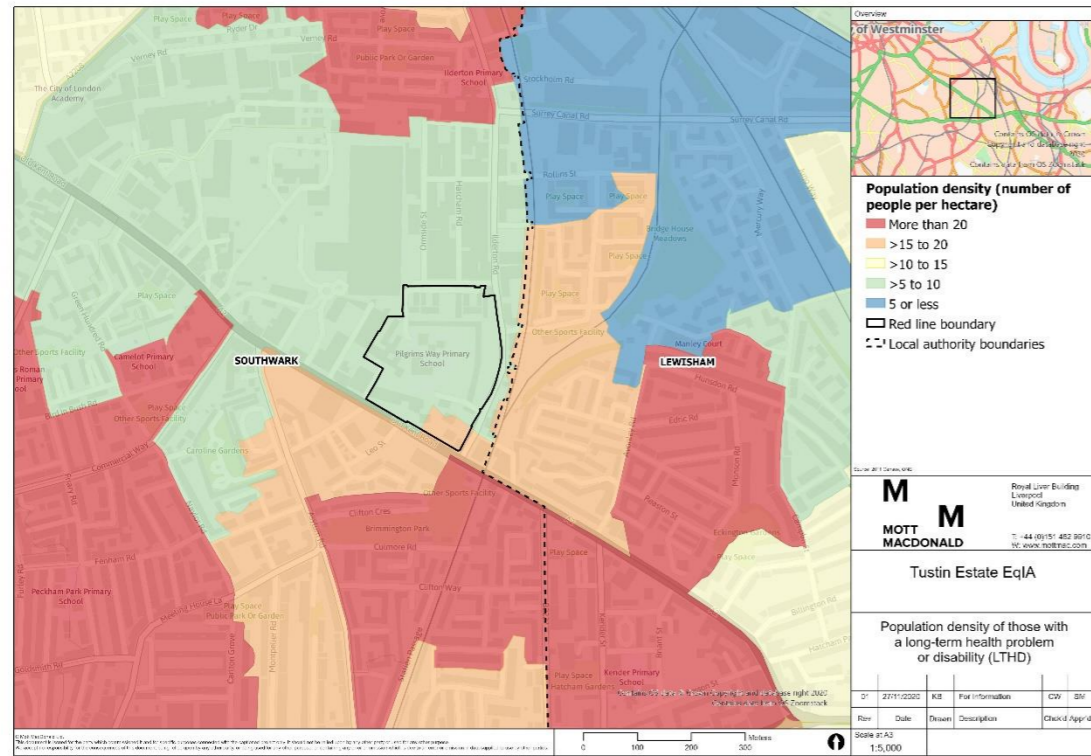
Map B.9: Proportion of residents with a long-term health condition or disability



Source: Mott MacDonald

Map A.11, below, illustrates that across the majority of the Estate, the density of people with a long-term health problem or disability is between 6 and 10 people per hectare. This is lower than most areas surrounding the Estate.

**Map B.10: Population density of people within the Estate with a long-term health problem or disability**



Source: Mott MacDonald

**Gender reassignment**

There are no Census or other data for the number of gender variant people with the Estate, Southwark, Greater London, or England. Data on gender identity is currently limited as there are still a number of methodological challenges obtaining this data such as privacy and acceptability; complexity; accuracy; terminology; small sample universe, and the scope of information required.<sup>154</sup> The ONS, though, has estimated that the size of the Trans community in the UK could range from 65,000 to 300,000.<sup>155</sup>

**Marriage and civil partnership**

The total proportion of those who are married or in a civil partnership that live within the Estate (30%) is lower than Southwark, Greater London, and England (29%, 40%, and 47% respectively).

The table below shows that there is a lower percentage of married people within the Estate (25%), compared to Southwark (29%). However, both the Estate and Southwark's percentage of married people are considerably lower than both Greater London, and England (40% and 47% respectively). The proportion of people in a civil partnership in the Estate (0.5%) is broadly in line with that in Southwark, Greater London and England (0.9%, 0.4% and 0.2% respectively). The proportion of people on the Estate who are separated, but still legally married, (6%) is broadly in line with figures in Southwark, Greater London and England (4%, 3% and 3% respectively).

**Table B.6: Population married or in a civil partnership**

Location	All usual residents aged 16+, 2011	Married	%	In a civil partnership	%	Separated (still legally married or in a civil partnership)	%
Estate	870	270	31%	4	0.5%	54	6%
Southwark	234,901	66,997	29%	2,159	0.9%	10,080	4%
Greater London	6,549,173	2,608,345	40%	27,425	0.4%	211,500	3%
England	42,989,620	20,029,369	47%	100,288	0.2%	1,141,196	3%

Source: Office for National Statistics 2011 Census

<sup>154</sup> Office for National Statistics (date unknown): 'Gender identity update'

<sup>155</sup> Office for National Statistics (2009): 'Trans Data Position Paper'.

## Pregnancy and maternity

Table A.7, below, shows that live births in Southwark, as a proportion of the total population (1.3%), are broadly in line with Greater London and England figures (1.3% and 1.1% respectively). Estate level data is not available for pregnancy and maternity.

**Table B.7: Live births by mothers' usual area of residence**

Births	Southwark	Greater London	England
Female population aged between 16 and 44	80,405	1,978,845	10,581,832
Total population	320,017	9,002,488	56,550,138
Live births by mothers' usual area of residence	3,557	111,688	585,195
Live births by mothers' usual area of residence (%)	1.3%	1.3%	1.1%

Source: Office of National Statistics 2020 mid-year population estimates.

Table A.8 below shows that the General Fertility Rate (all live births per 1000 women aged 16 to 44) in Southwark (44.2) is lower than that of the general fertility rate in Greater London (56.4) and England (55.3). The Total Fertility Rate in Southwark (1.18) is lower than the total fertility rate in Greater London (1.54) and England (1.59).

**Table B.8: General and total fertility rates**

Fertility Rate	Southwark	Greater London	England
General fertility rate (all live births per 1000 women aged 16 to 44)	44.2	56.4	55.3
Total fertility rate (average number of children born per woman)	1.18	1.54	1.59

Source: ONS 2020 mid-year population estimates and Live births in England and Wales : birth rates down to local authority areas 2018

## Race and ethnicity

The table below provides a breakdown of the race and ethnicities of residents on the Estate compared with Southwark, Greater London, and England. The proportion of those from an Ethnic Minority background (76%) is considerably higher than Southwark (60%), Greater London (55%) and England (20%). The largest ethnic minority group on the Estate are those from a Black African background (28%). This is higher than the proportion in Southwark (16%), Greater London (7%), and England (2%).

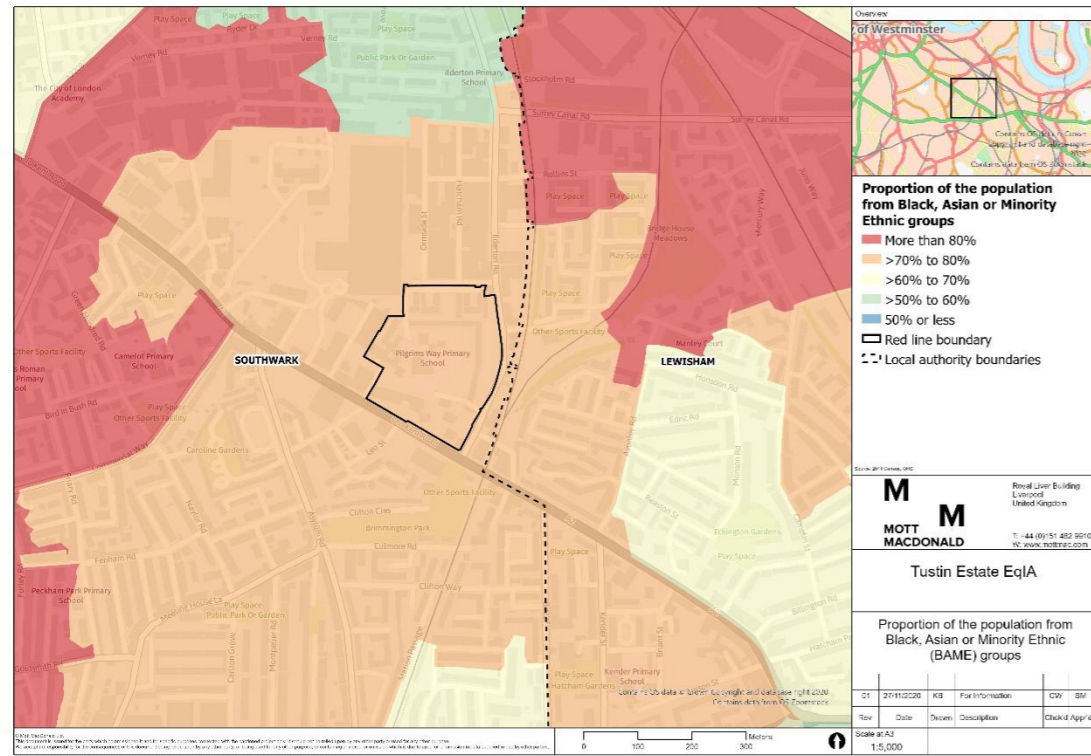
**Table B.9: Population by race and ethnicity**

Race and ethnicity	Estate	Southwark	Greater London	England
<b>White British</b>	<b>24%</b>	<b>40%</b>	<b>45%</b>	<b>80%</b>
<b>Ethnic minority</b>	<b>76%</b>	<b>60%</b>	<b>55%</b>	<b>20%</b>
Irish	2%	2%	2%	1%
Gypsy or Irish Traveller	0.1%	0.1%	0.1%	0.1%
Other White	12%	12%	13%	5%
White and Black Caribbean	3%	2%	1%	0.8%
White and Black African	2%	1%	0.8%	0.3%
White and Asian	0.5%	1%	1%	0.6%
Other mixed	2%	2%	1%	0.5%
Indian	1%	2%	7%	3%
Pakistani	0.3%	0.6%	3%	2%
Bangladeshi	0.6%	1%	3%	0.8%
Chinese	2%	3%	2%	0.7%
Other Asian	3%	3%	5%	2%
Black African	28%	16%	7%	2%
Black Caribbean	8%	6%	4%	1%
Other Black	6%	4%	2%	0.5%
Arab	1%	0.8%	1%	0.4%
Any other ethnic group	4.5%	2%	2%	0.6%

Source: Office for National Statistics 2011 Census

Map A.11 below illustrates that people from an ethnic minority background represent three quarters of the population within the Estate and in surrounding areas. There are similar proportions of people from an ethnic minority background within the Estate compared to surrounding area, with nearly all areas containing proportions between 71% and 80%.

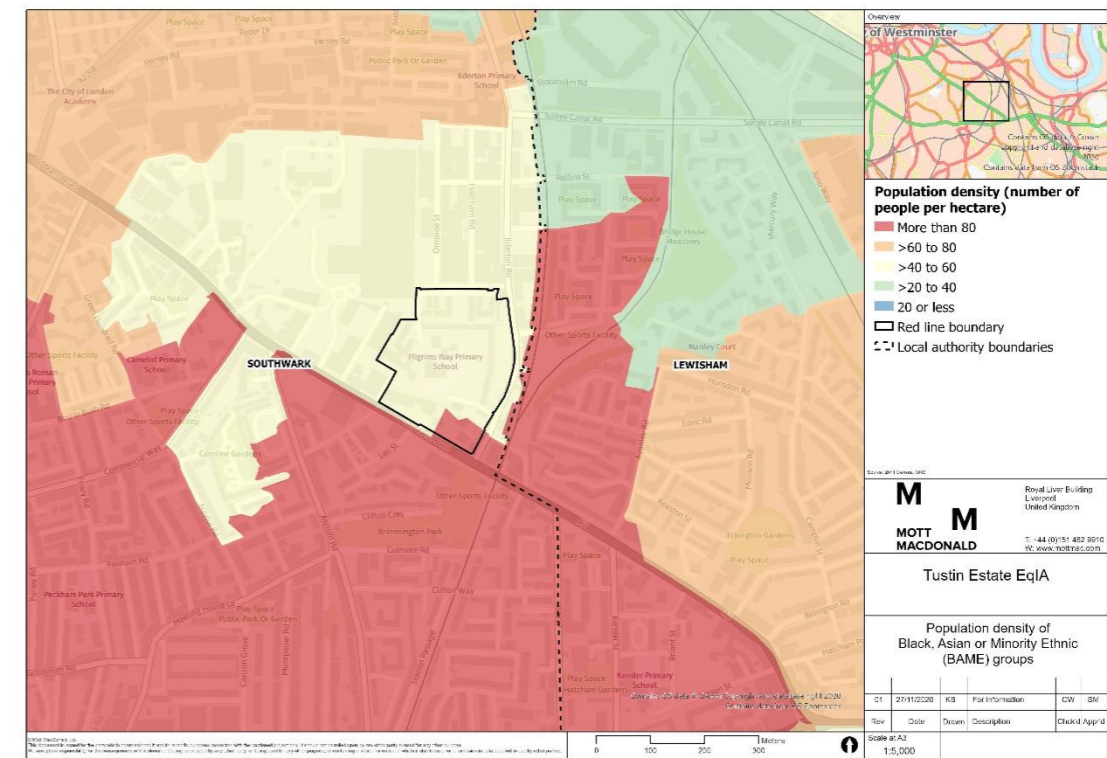
**Map B.11: Proportion of people from an Ethnic Minority background within the Estate**



Source: Mott MacDonald

Map A.12, below, indicates that there is a lower density of people from an ethnic minority background within the Estate when compared to surrounding areas. Most of the Estate has a density of between 41 to 60 people from an ethnic minority background per hectare. A small area of the Estate in the south has a higher density of people per hectare (80 people per hectare).

**Map B.12: Population density of people from an ethnic minority background within the Estate**



Source: Mott MacDonald

## Religion and belief

The table below provides a religious profile of the Estate, compared with Southwark, Greater London, and England. The Estate has a higher Christian population (59%) compared to Southwark (53%) and Greater London (48%) but is in line with that of England (59%). Proportions of people from minority faith groups are broadly in line with those for Southwark, Greater London and England.

**Table B.10: Population by religion or belief**

Religion and belief	Estate	Southwark	Greater London	England
<b>Christian</b>	59%	53%	48%	59%
<b>Minority Faith*</b>				
Buddhist	1%	1%	1%	0.5%
Hindu	0.4%	1%	5%	2%
Jewish	0.1%	0.3%	2%	0.5%
Muslim	11%	9%	12%	5%
Sikh	0.4%	0.2%	2%	0.8%
Other Religion	0.7%	0.5%	0.6%	0.4%
No Religion	17%	27%	21%	25%
Religion Not Stated	9%	9%	8%	7%

Source: Office of National Statistics 2011 Census

## Sex

The following table shows the proportion of the population who are male and female on the Estate, compared to Southwark, Greater London and England. Proportions of males (52%) and females (48%) that live within the Estate are broadly in line with other areas.

**Table B.11: Population by Sex**

Sex	Estate	Southwark	Greater London	England
Male	53%	50%	50%	49%
Female	47%	50%	50%	51%

Source: ONS 2020 mid-year population estimates

## Sexual orientation

There is no data available on this protected characteristic for the study area. However, emerging experimental statistics relating to sexual identity are available nationally and at a regional level.

In 2017, estimates from the Annual Population Survey (APS)<sup>156</sup> showed that 93% of the UK population identified as heterosexual or straight and 2% of the population identified themselves as lesbian, gay or bisexual (LGB). This comprised of:

- 1.3% identifying as gay or lesbian
- 0.7% identifying as bisexual
- A further 0.6% of the population identified themselves as “other”, which means that they did not consider themselves to fit into the heterosexual or straight, bisexual, gay or lesbian categories.
- A further 4.1% refused or did not know how to identify themselves.

<sup>156</sup> Source: Office for National Statistics (2017): See: <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualidentityuk/2016>

### B.2 Community resources

There are a number of community facilities and resources located both within, and in close proximity to, Tustin Estate. Within the estate, these include a primary school, two faith groups, a daycare/learning centre, and a community centre. Table A.13 lists the community facilities located within the Estate boundary.

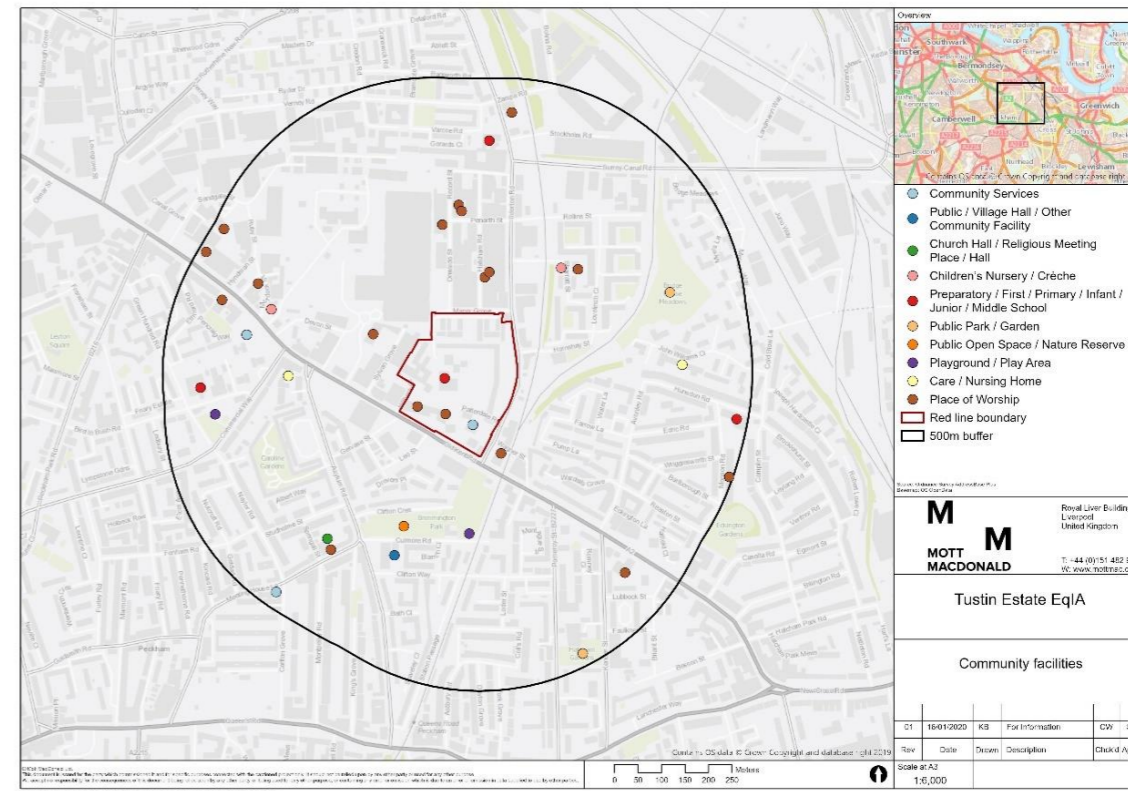
**Table B.12: : List of community facilities within the Estate**

Name	Category	Address
Day care / learning centre	Education	803 Old Kent Road
Pilgrims Way Primary School	Infant School	Manor Grove
Divine Prophetic Interdenominational Ministries	Church	
Redeemed Assemblies	Church	
Tustin Community Centre	Community Services	Windermere Point

Source: AddressBase

Map A.14 below maps the location of community resources and facilities within and surrounding the estate, which are likely to be accessed by protected characteristic groups, or if they were to be lost, would potentially adversely affect protected characteristic groups. Within the Estate boundary, there are two Christian churches which will predominately be used by members of that faith. Children are likely to be impacted by the relocation of the Pilgrims Way Primary School and the day care/learning centre. There is also the Tustin Estate Community Centre, which is available for use by all residents of the current estate.

**Map B.13: Community resources within and around the Estate**

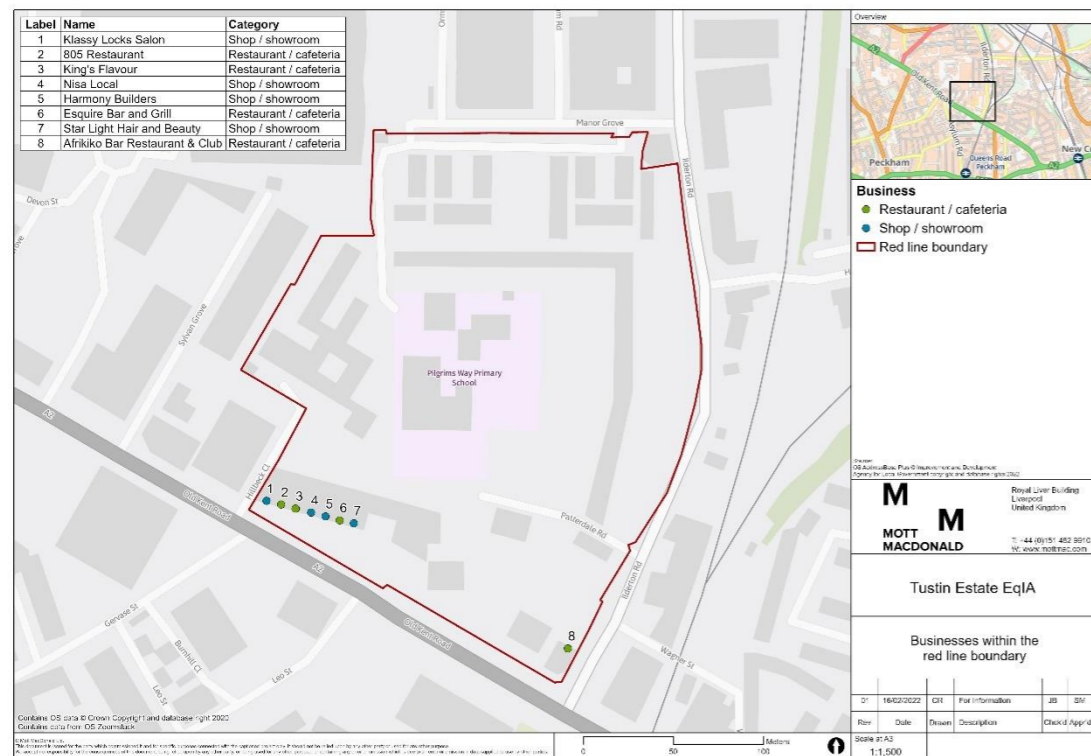


Source: AddressBase

### B.3 Businesses

There are a number of commercial units located on the Estate facing Old Kent Road in Bowness House. The businesses occupying these units are mapped and labelled in Map A.15 below. The businesses include two restaurants, a convenience store, one hair and beauty salon, one take away and an accountancy. These may be affected by any demolition and rebuild option on the Estate, which could have equality impacts on owners and employees, and potentially local residents.

Map B.14: Businesses within the Estate



Source: Southwark Council business information

### B.4 Health profile

The following presents a human health overview for the Estate. Where Estate-level information is not available, data is shown for the wider Borough.

#### Local economy

Good quality employment and local economic conditions are important determinants of health. The following table highlights employment, unemployment and proportion of those claiming Jobseeker's Allowance (JSA) and those claiming Universal Credit (UC). The claimant count combines all those claiming benefit principally for the reason of being unemployed.

Table A.24: Employment and unemployment

Location	Claimants as a % of working age population	Unemployment rate (%)	Employment rate (%)
Southwark	4%	5%	78%
Greater London	3%	5%	74%
England	2%	4%	75%

Source: Nomis Labour Market Profile (2018-2020) \*data for the Estate is not available.

Unemployment in the local area is in line with Greater London and England, as is the proportion of people claiming Job Seekers Allowance (JSA) or Universal Credit. The employment rate in Southwark (78%) is higher than England (75%).

Table A.35: Median annual pay

Location	Full-time workers (£)	Part-time workers (£)
Southwark	39,183	10,585
Greater London	36,797	10,699
England	30,661	10,521

Source: Nomis Labour Market Profile (2019) \*data for the Estate is not available.

Median income for full-time workers in Southwark is higher than both London and England, at £39,183 per annum, compared to £36,797 and £30,661, respectively. For part-time workers, income is broadly in line with that of London and England, at £10,585 per annum, compared to £10,699 in London and £10,521 in England.

#### Deprivation

The index of Multiple Deprivation (IMD) brings together data covering seven different aspects or 'domains' of deprivation into a weighted overall index for each Lower-layer Super Output Area (LSOA) in England.<sup>157158</sup> The scores are then used to rank the LSOAs nationally and to calculate an IMD score for each local authority area. These are then divided into deciles or

<sup>157</sup> The domains used in calculating the index are: Income; Employment; Education, Skills and Training; Health Deprivation and Disability; Crime; Barriers to Housing and Services; and Living Environment.

<sup>158</sup> LSOAs are a geographical unit which has an average of 1,500 residents and 650 households. They were developed following the 2001 census, through the aggregation of smaller census output areas, to create areas with a reasonably compact shape and which were socially similar (assessed through housing type). (<https://data.gov.uk/dataset/c481f2d3-91fc-4767-ae10-2efdf6d58996/lower-layer-super-output-areas-lsoas>)

quintiles, with 1 being the most deprived 20% of LSOAs, and 5 the least deprived 20% of LSOAs (in the case of quintiles).

The following table shows the proportion of the population of the Site who live in each deprivation quintile. The Site falls within an area of higher deprivation, where the entire population lives within the most or second most deprived quintile. The Site has a higher proportion of those living in the most deprived quintile (25%), compared with Southwark, Greater London, and England (21%, 16%, and 20% respectively). A considerably higher number of people (75%) live in the second most deprived quintile, compared with Southwark (47%), Greater London (32%) and England (21%).

There is evidence to suggest that people living in the most deprived areas in England spend more time in ill health compared the rest of the population.

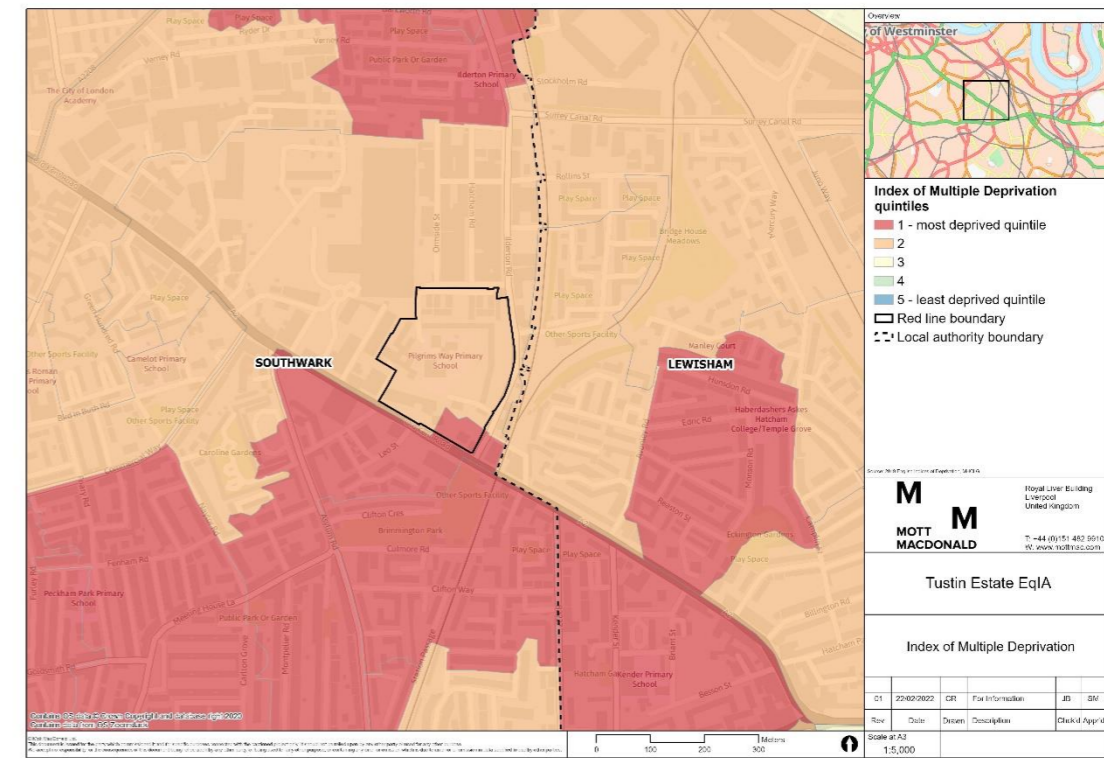
**Table B.15: Population by deprivation**

Location	Most deprived quintile (%)	Second most deprived quintile (%)	Third most deprived quintile (%)	Fourth most deprived quintile (%)	Least deprived quintile (%)
Site	25%	75%	0%	0%	0%
Southwark	21%	47%	21%	8%	3%
Greater London	16%	32%	23%	17%	12%
England	20%	21%	20%	20%	19%

Source: ONS 2020 mid-year population estimates and 2019 Indices of Multiple Deprivation

Map A.16, below, shows that most of the Site is in the second most deprived quintile.

**Map B.15: Index of Multiple Deprivation**



Source: Mott MacDonald

**Human health**

The table below provides an overview of the health of the population in Southwark. Figures for the Estate are unavailable. Consideration has been given to conditions and impairments that may be exacerbated by the improvement programme construction and design, including potential impacts such as relocation and associated social cohesion impacts, an increase in air pollution or noise, or loss/gain of public open space and recreation facilities.

**Table B.16: Human health indicators**

Category	Indicator	Southwark	Southwark %	England	England %
Physical activity	Percentage of physically active adults (PHE 2019 estimates)	-	72%	-	66%
	Obese children (Year 6) (PHE 2019)	-	27%	-	22%
Cardiovascular and respiratory health	Emergency hospital admissions for Chronic Obstructive Pulmonary Disease	613	-	415	-



Category	Indicator	Southwar k	Southwark %	England	England %
	(COPD) per 100,000				
	Under 75 mortality rates from cardiovascular diseases (PHE 2019) per 100,000	88	-	72	-
	Under 75 mortality rates from all respiratory diseases (PHE 2019) per 100,000	31	-	29	-
	Mortality rate for deaths involving COVID-19 (2020) per 100,000	177.3		140.1	
Mental health	Social isolation: % of adult social care users who have as much social contact as they would like (18+ years) (PHE 2019/20)	-	34%	-	46%
	% reporting depression or anxiety (PHE 2020)	-	14%	-	14%
Life expectancy	Male life expectancy at birth	79	-	79	-
	Female life expectancy at birth	83	-	83	-

Source: Public Health England (2017-2019)

Southwark has better rates of healthy behaviours in terms of levels of physical activity with a larger proportion of physically active adults (72%) compared to England (66%). However, Southwark has poorer rates of health behaviour in terms of childhood obesity, with high child obesity (27%) compared to the figure for England (22%).

There is likely a higher prevalence of those with respiratory and cardiovascular conditions in Southwark when compared to England, as mortality and hospital admissions from these diseases are higher. Mortality due to COVID-19 in 2020 was also higher in Southwark than in England.

Adults who are social care users in Southwark reportedly feel lonelier than those elsewhere in London – Southwark reports higher loneliness amongst adult social care users than any other borough. When compared to England, only 34% of respondents reported having as much social contact as they would like compared to 46%. However, those reporting depression or anxiety in Southwark is in line with England.

Male healthy life expectancy is broadly in line with the national average. Female healthy life expectancy is (number of years a person can expect to live in good health) higher than the national average. Healthy life expectancy at birth is an overall measure of how social, economic and environmental conditions in an area are affecting a population.

### Socio-demographic monitoring

#### Equality Survey

In Autumn 2019, Southwark Council arranged to visit each of the 289 occupied low-rise homes on Tustin Estate to administer the ‘Starting the Conversation’ paper questionnaire. The intention of this survey was to attain an understanding of household needs across the Estate.

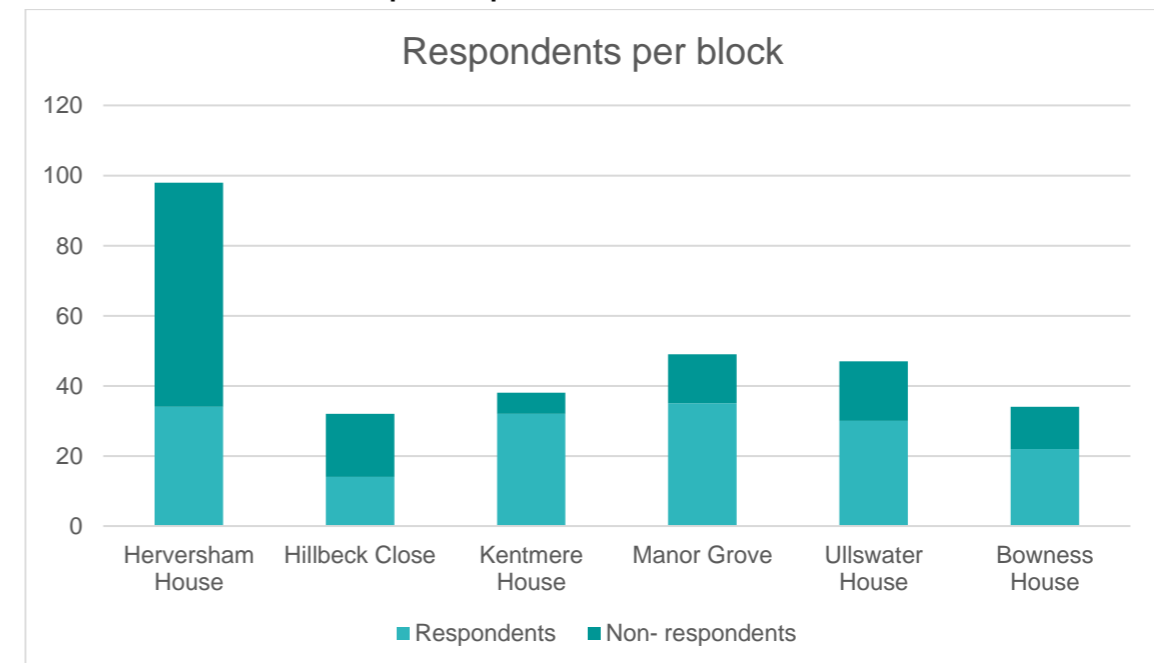
The visits were made on an appointment basis and lasted around 60 minutes each. In instances where it was difficult to make contact with the resident, homes were visited at least three times to arrange an appointment.

202 of the 289 homes were visited (70%), including 166 of the 219 tenanted homes (76%). 10 households refused to take part in the survey.

The survey only asked about the characteristics of the person responding to the survey, and to report on household needs with respect to those living in the household.

#### Analysis

Chart B.1: Residents and responses per block



Source: Southwark

Those who completed the equality survey were asked to outline their demographic details. The results have been outlined below.

### Age

Residents that live in the properties that took part in the survey are from a range of ages. The majority of residents who took part in the survey were aged between 35-44 (39 residents) followed by those aged 45- 54 (35 residents) and those aged between 55-64 (31 residents).

Most of the blocks had a similar age trend, with a range of ages with the majority of respondents of working age. Of the older people who completed the survey (31 respondents in total), the majority live in either Manor Grove (12 respondents) or Kentmere House (11 respondents). 34% of the respondents in both Manor Grove and Kentmere House were older people.

Children and young people were also identified through the survey. One respondent identified themselves as being under 16 and four identified themselves as being 16-24, three of whom live in Ullswater house.

### Disability

Of the residents who participated in the survey, just under a quarter of people (39 respondents) reported that their day to day activities were limited to some extent because of a health problem or disability. Nearly half of these respondents (18) reported that this limited their day to day activity 'a lot'.

Of the respondents who described the nature of their disability (40), the majority (30 respondents) reported that this was or included a physical or mobility impairment. 10 respondents reported either a hearing or vision impairment, or long-term mental illness, eight reported having memory problems and four reported having learning difficulties.

Of the respondents who described the nature of their disability (40), nearly half (19) were older people.

### Gender reassignment

Of the residents who took part in the survey, nobody identified themselves as being transgender. Three chose not to answer the question.

### Marriage and Civil Partnerships

The survey did not ask respondents about their marital status.

### Pregnancy and Maternity

The survey did not ask respondents if where they were pregnant or had been pregnant in that last year.

### Race and ethnicity

Of Tustin Estate residents who took part in the survey, two-thirds identified as being from an ethnic minority background. Half (83) of the residents who took part in the survey identified as black. Of those who identified as black, 48 identify as being from a black British or Nigerian background.

One third of residents who took part in the survey (59) identify themselves as white, and just under one tenth (15) identify themselves as being from an Asian background.

Of the residents who took part in the survey, the distribution of race and ethnicity reported across different blocks is mostly even.

### Religion and belief

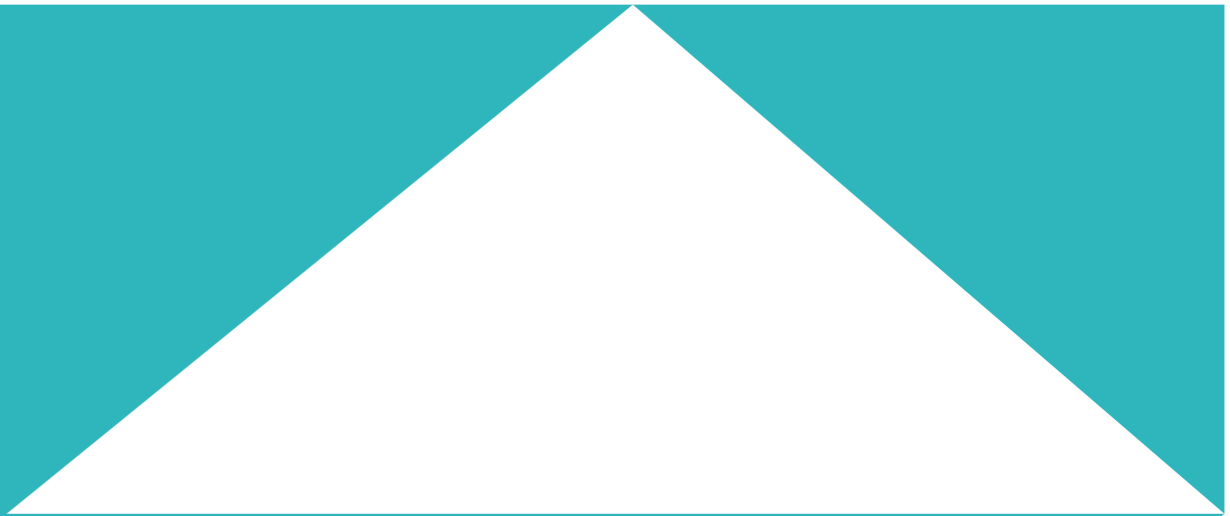
Of the residents who took part in the survey, over half (96 respondents) identify as being Christian, followed by those with no religion (34) and those who identify as Muslim (30) . Residents of a minority faith were also identified through the survey – two respondents reported that they are Buddhist, one reported they are Jewish, one reported they are a Jehovah's Witness, and one identified as Orthodox.

### Sex

The majority of residents who responded to the survey were female (109). 59 respondents were male and two residents chose not to answer the question. Of those who responded, the majority of women (25) live in Heversham House, and the majority of men (14) live in Kentmere House.

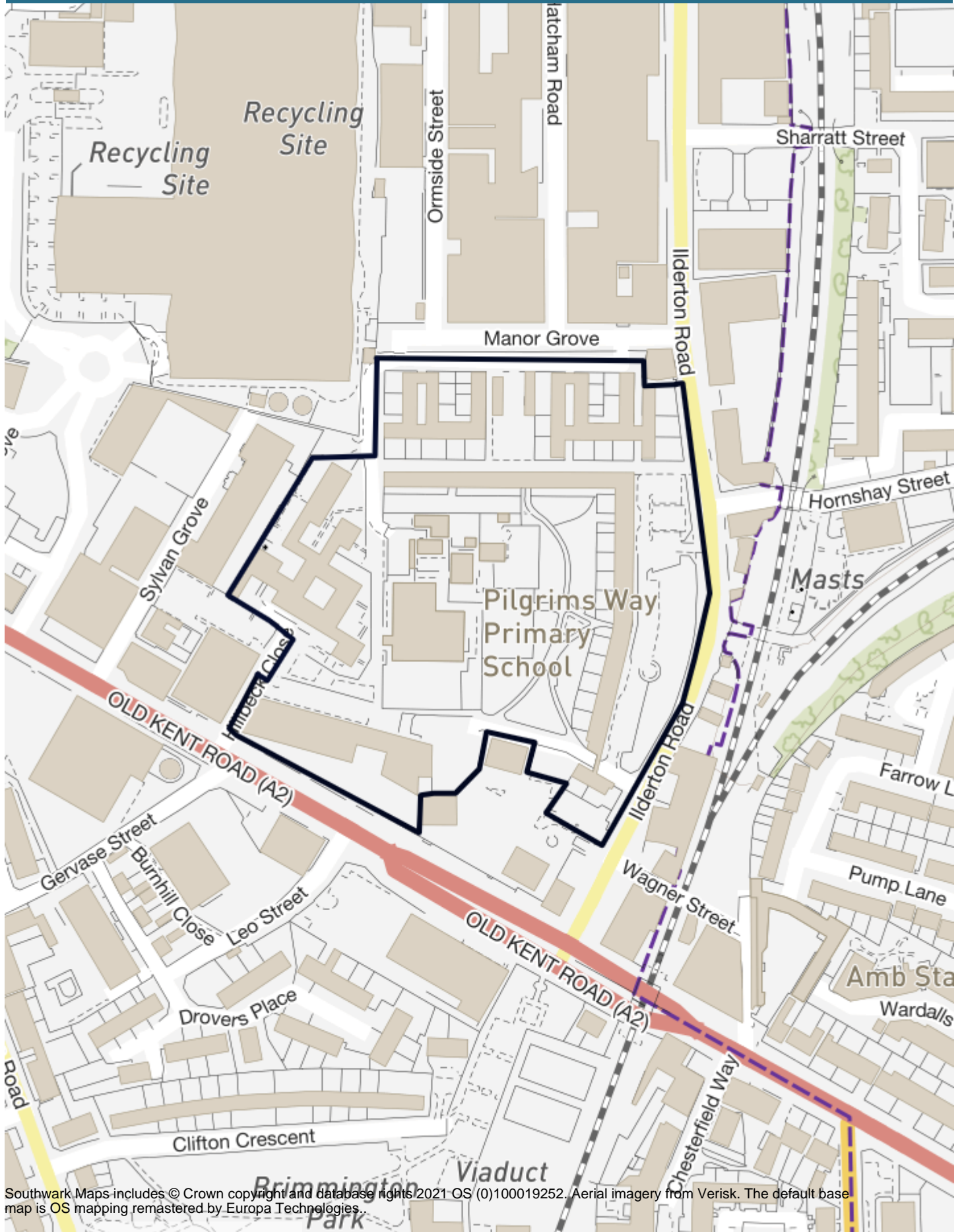
### Sexual Orientation

Of the residents who took part in the survey, nearly all (162) reported as identifying as heterosexual or straight. One resident identified themselves as being gay, one resident identified themselves as being bisexual, and nine residents chose not to answer the question.





TUSTIN ESTATE LAND BOUNDED BY MANOR GROVE ILLERTON ROAD HILLBECK CLOSE OLD KENT ROAD, LONDON, SE1



Southwark Maps includes © Crown copyright and database rights 2021 OS (0)100019252. Aerial imagery from Verisk. The default base map is OS mapping remastered by Europa Technologies.

<b>Item No.</b> 7	<b>Classification:</b> Open	<b>Date:</b> 14 September 2022	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>		Development Management	
<b>Ward(s) or groups affected:</b>		All	
<b>From:</b>		Proper Constitutional Officer	

## RECOMMENDATIONS

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

## BACKGROUND INFORMATION

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

## KEY ISSUES FOR CONSIDERATION

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

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

#### **Community impact statement**

11. Community impact considerations are contained within each item.

#### **SUPPLEMENTARY ADVICE FROM OTHER OFFICERS**

##### **Director of Law and Democracy**

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

development plan, the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published, as the case may be (s38(5) Planning and Compulsory Purchase Act 2004).

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

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

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

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

## BACKGROUND DOCUMENTS

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

## APPENDICES

No.	Title
None	

## AUDIT TRAIL

<b>Lead Officer</b>	Chidilim Agada, Head of Constitutional Services		
<b>Report Author</b>	Gregory Weaver, Constitutional Officer Sadia Hussain, Acting Deputy Head of Law (Property and Development)		
<b>Version</b>	Final		
<b>Dated</b>	6 September 2022		
<b>Key Decision?</b>	No		
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>			
<b>Officer Title</b>	<b>Comments sought</b>	<b>Comments included</b>	
Director of Law and Democracy	Yes	Yes	
Director of Planning	No	No	
<b>Cabinet Member</b>	No	No	
<b>Date final report sent to Constitutional Team</b>			6 September 2022



# Agenda Item 7.1



20/AP/3013 - COLECHURCH HOUSE, LONDON BRIDGE, SE1 2SS



Southwark Maps includes © Crown copyright and database rights 2021 OS (0)100019252. Aerial imagery from Verisk. The default base map is OS mapping remastered by Europa Technologies.

## Contents

Contents .....	1
EXECUTIVE SUMMARY .....	4
BACKGROUND INFORMATION .....	6
Site location and description .....	6
Details of proposal .....	7
Planning history of the site, and adjoining or nearby sites .....	19
KEY ISSUES FOR CONSIDERATION .....	19
Summary of main issues .....	19
Legal context .....	19
Planning policy .....	20
ASSESSMENT .....	22
Principle of the proposed development in terms of land use .....	22
Theatre .....	25
Environmental impact assessment .....	28
Design .....	29
Impact of proposed development on amenity of adjoining occupiers and surrounding area .....	53
Environmental matters .....	67
Energy and sustainability .....	74
Planning obligations (S.106 agreement) .....	79
Mayoral and borough community infrastructure levy (CIL) .....	81
Community involvement and engagement .....	82
Consultation responses from local groups .....	85
Community impact and equalities assessment .....	91
Human rights implications .....	92
Positive and proactive statement .....	92
Positive and proactive engagement: summary table .....	93
CONCLUSION .....	93
BACKGROUND DOCUMENTS .....	95
APPENDICES .....	95
AUDIT TRAIL .....	95



<b>Item No.</b> 7.1	<b>Classification:</b> OPEN	<b>Date:</b> 14 September 2022	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>	<p><b>Development Management planning application:</b> Application 20/AP/3013 for: Full Planning Application</p> <p><b>Address:</b> Colechurch House, London Bridge Walk, London Southwark</p> <p><b>Proposal:</b> Redevelopment of the site to include demolition of Colechurch House, pedestrian footbridge and walkway and erection of an elevated 22-storey building (+ 4-storey basement) above a public park and providing office floorspace, retail floorspace, restaurant/café floorspace, leisure floorspace (all Use Class E), theatre and a bar (Sui Generis), delivered alongside a replacement pedestrian footbridge, public realm improvements, roof gardens, cycle parking, servicing, refuse, plant areas and other associated works incidental to the development.</p>		
<b>Ward(s) or groups affected:</b>	London Bridge and West Bermondsey		
<b>From:</b>	Director of Planning and Growth		
<b>Application Start Date</b>		<b>PPA Expiry Date</b> 31 December 2022	
<b>Earliest Decision Date</b>			

## RECOMMENDATIONS

1. That planning permission is granted subject to conditions, referral to the Mayor of London and the applicant entering into an appropriate legal agreement; and
2. That environmental information be taken into account as required by Regulation 26(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended); and
3. That the planning committee in making their decision has due regard to the potential Equalities impacts that are outlined in this report; and
4. That following the issue of planning permission, the director of planning and growth write to the secretary of state notifying them of the decision, pursuant to Regulation 30(1)(a) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017; and
5. That following issue of planning permission, the director of planning and growth place a statement on the Statutory Register pursuant to Regulation 28(1) of the TCP (EIA) Regulations 2017, which contains the information required by Regulation 28 and, for the purposes of Regulation 28(1)(h) being the main

reasons and considerations on which the planning committee's decision was based shall be set out in the report; and

6. That, in the event that the requirements of (1) are not met by 31 December 2022 that the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in Paragraph 320 of this report.

## **EXECUTIVE SUMMARY**

7. The proposal is for a large, commercial led redevelopment of the site known as Colechurch House, located at the confluence of Tooley Street and Duke Street Hill, adjacent to London Bridge and Borough High Street. The development would comprise mainly offices and ancillary restaurant at upper levels. At ground floor and basement levels there would be a new theatre, retail units, restaurant/café and a gym. The building would rise to a maximum height of 104.2m (AOD) and 22 commercial storeys and as such would be classed as a tall building.
8. The development has been conceived as a single, tall building, raised above ground level in order to create a generous new public realm which would occupy the ground floor footprint of the building and create new north-south pedestrian linkages and visual connections. The development would see the creation of landscaped public open space on a site that is currently hard landscaped. The elevated building would open up views of the Grade II listed St Olaf House and views to Tooley Street which runs along the northern boundary of the site. At street level the proposed building would be much more engaging with active frontages and visual interest along Tooley Street and the new landscaped public realm opening out onto Duke Street Hill.
9. The architecture and standard of design of the new building is considered to be exceptional and befitting of a building of this scale in such a central London location where the standard of new development architecture is one of excellence. The proposed office accommodation would be of a high standard and would meet the needs of modern office users.
10. The development would provide a new theatre with two venues of different capacities, 250 people for the main theatre and 150 for the second theatre where both are proposed to have flexible a configuration. It is intended that the theatre would become a new home for Southwark Playhouse and the theatre would be offered to them on affordable terms as part of the applicants affordable workspace offer and this would equate to a 75% discount on market rent levels. Additional office space and retail space would be provided as affordable workspace bringing the total on-site offer to 8% with the remaining 2% being provided as an in lieu payment to fund the fit out of the theatre space to a specification agreed with Southwark Playhouse.
11. The development would be highly energy efficient and sustainable with an on-site carbon reduction of 55% above the 2013 Building Regulations in addition to a carbon offset payment that would help the development achieve Carbon Zero targets. It is expected that the development would achieve BREEAM 'Outstanding' and this would be a conditioned requirement of any consent.

12. The site is located in the Central Activities Zone, the Bankside Borough and London Bridge Opportunity Area and the London Bridge District Town Centre, and is allocated in the Southwark Plan as NSP55. The proposals are consistent with the site allocation and the objectives of the development plan for this area.
13. The impact on the amenity of neighbours in terms of privacy, outlook and daylight/sunlight is set out in the report. It is noted that whilst there would be no significant adverse impacts on any residents, there would be some impacts on the windows of London Bridge Hospital, closest to the site. None of the windows or rooms that would be affected are homes and as such the standards of the BRE cannot be strictly applied. The use of these spaces is transient in nature and as such would not lead to any significant adverse impacts on users. These impacts need to be considered in the context of the character of the area in line with the flexibility expected by the BRE when looking at dense urban environments. These impacts also need to be balanced against the significant benefits of delivering this scheme
14. The development would be reliant on the Stopping Up (closure) of London Bridge Walk and whilst this has been concluded as being acceptable in planning terms, the applicant would need to make a separate application for permission to close Joan Street from the Highways Authority (LBS).
15. A total of 257 letters were sent to local residents as part of the council's neighbour consultation exercise and 14 letters of objection were received. A total of 154 letters of support have also been received. A detailed breakdown of the objections is included at paragraph 27.

Use Class	Existing sqm	Proposed sqm	Change +/-
Use Class E (a) to (f) retail/financial services	1,569	1,522	-47
Use Class E (g) i) Office	4,993	43,925	+38,932
Affordable workspace Use Class E	0	3,744 (8%)	+3,744
Sui Generis	0	2,0696	+2,0696
Jobs	165	Up to 3050	Up to + 2,885

16. CO2 Savings beyond part L Bldg. Regs.	55%
Trees lost	2 Class B and 7 Class C
Trees gained	38 (29 net gain)

	Existing	Proposed	Change +/-
Urban Greening Factor	0	0.28	+0.28
Public open space	-	2,277sqm	
Greenfield Run Off Rate	Unknown	1.34l/s	-1.34l/s
Green/Brown Roofs	0	547sqm	+547sqm

EVCPS (on site)	0	1	+ 1
Cycle parking spaces	0	815	+815

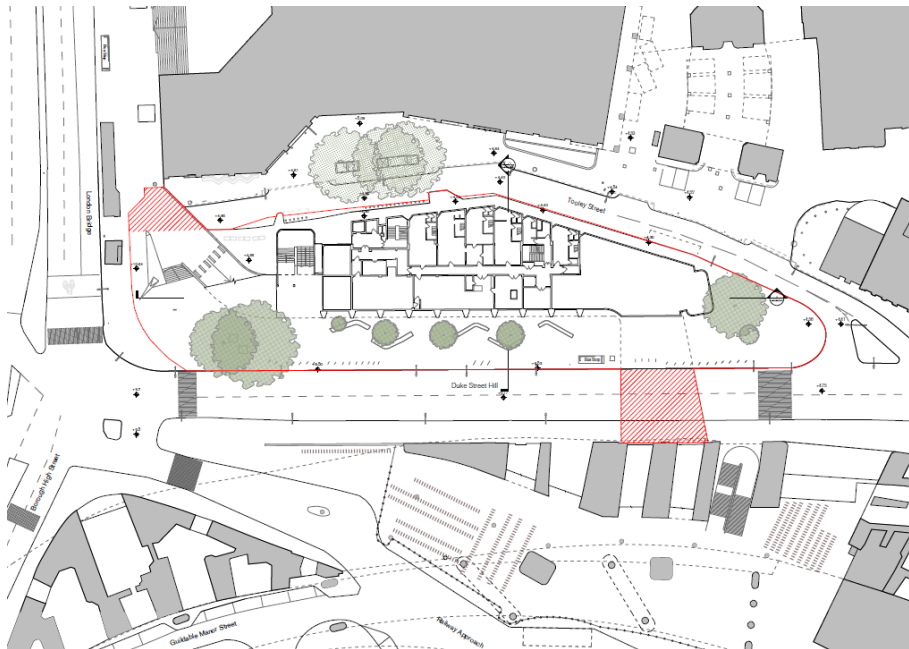
18.	CIL (estimated)	£3,580,062.40
	MCIL (estimated)	£7,670,315.99
	S106	£2,996,503 (equivalent)

## BACKGROUND INFORMATION

### Site location and description

19. The application site measures approximately 0.28 hectares and is bounded to the north and east by Tooley Street, to the south by Duke Street Hill and to the west by London Bridge. The site is currently occupied by Colechurch House, a 1960's concrete commercial building providing offices and retail floorspace. The retail spaces are located at lower ground, ground and first floor level with all office accommodation located on the remaining upper levels. There is a car park with capacity for 15 cars located at lower ground floor level and accessed from Tooley Street. The application site also encompasses the majority of the existing footway on the north side of Duke Street Hill. An elevated walkway with a footbridge linking to London Bridge Station is provided above Duke Street Hill from the south of the site. The River Thames is located approximately 55 metres to the north of the site.

Image – Site location plan



20. The existing building is of low architectural quality and is hampered by large expanses of inactive frontages on Tooley Street and Duke Street Hill which further diminishes the appearance of the building and fails to contribute positively to the area. The elevated walkway (known as London Bridge Walk) and footbridge are busy routes during the morning and evening rush hour however

they are only lightly used outside of these times. The footbridge is a dominant feature within the local streetscape.

Image – Colechurch House



21. The building is set within a hard landscaped public realm characterised by footways and street furniture as well as some street trees. None of the trees are protected by way of a formal Tree Preservation Order although the trees along the eastern boundary are within the Tooley Street conservation area and as such benefit from provisional protection. The western end of the site is marked by The Southwark Gateway Needle sculpture designed by Eric Parry, and the Borough High Street conservation area flanks the western boundary. The site is a central and prominent location within the London Bridge district town centre.
22. The surrounding area is characterised largely by London Bridge Station and the significant commercial development surrounding the station. The immediate area is predominantly commercial with some retail. There are also significant healthcare facilities in the area with London Bridge Hospital immediately to the north and east of the site and Guy's Hospital campus to the south of the site on the opposite side of London Bridge Station.
23. The surrounding townscape is varied and there is a range of building heights, including tall buildings such as The Shard (306m), Guy's Hospital Tower (142m) and the News International Building (78m); to the lower rise buildings eastwards along Tooley Street and further south within the Borough High Street conservation area. There are various tall buildings on the north side of the River Thames within the City of London.

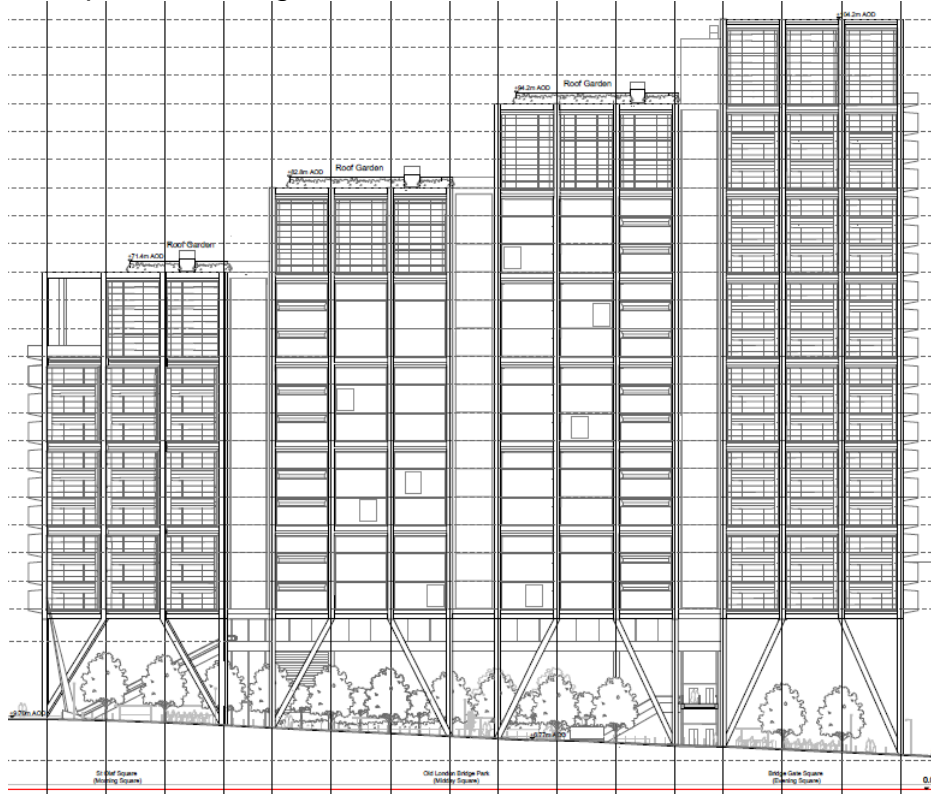
### **Details of proposal**

24. Planning consent is sought for the demolition of the existing Colechurch House and redevelopment of the site to provide a new elevated 22 storey building with four levels of basement. The redevelopment would provide new offices, retail



space, a gym, food and beverage outlets and a new theatre incorporating an ancillary bar.

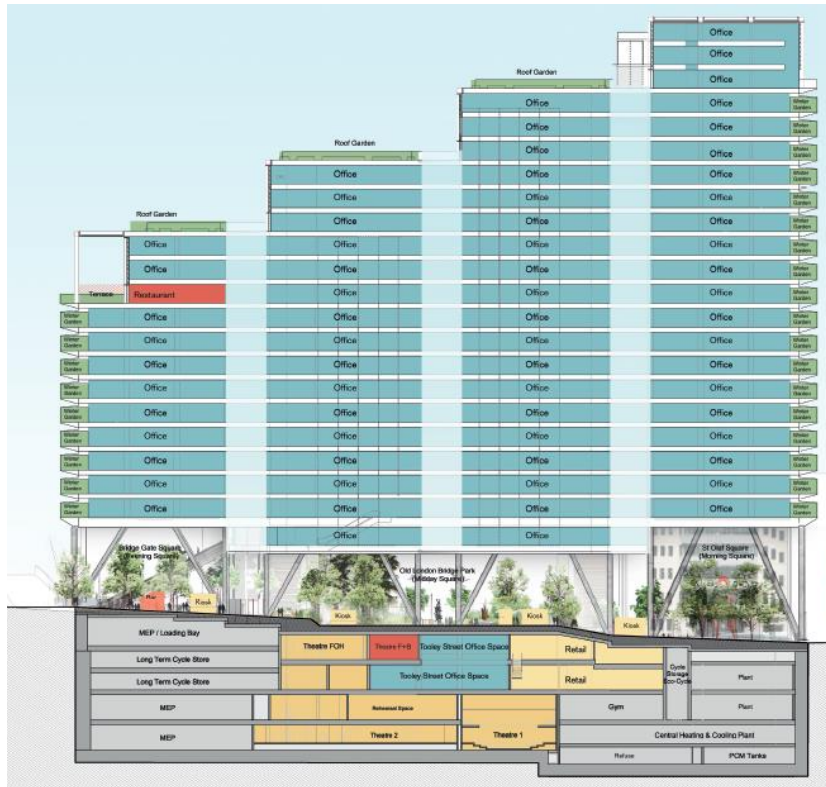
Image – Proposed building as viewed from Duke Street Hill



25. The relevant land use floor areas are set out in the table below:

Use	Use Class	Proposed GIA (sqm)	Proposed GEA (sqm)
Office	Class E	43,925	46,821
Theatre	Sui Generis	2,696	3,195
Retail	Class E	465	522
Restaurant/Café	Class E	691	717
Gym	Class E	366	525
Bar (ancillary to theatre)	Sui Generis	20	20
<b>Total</b>	-	<b>48,163</b>	<b>51,800</b>

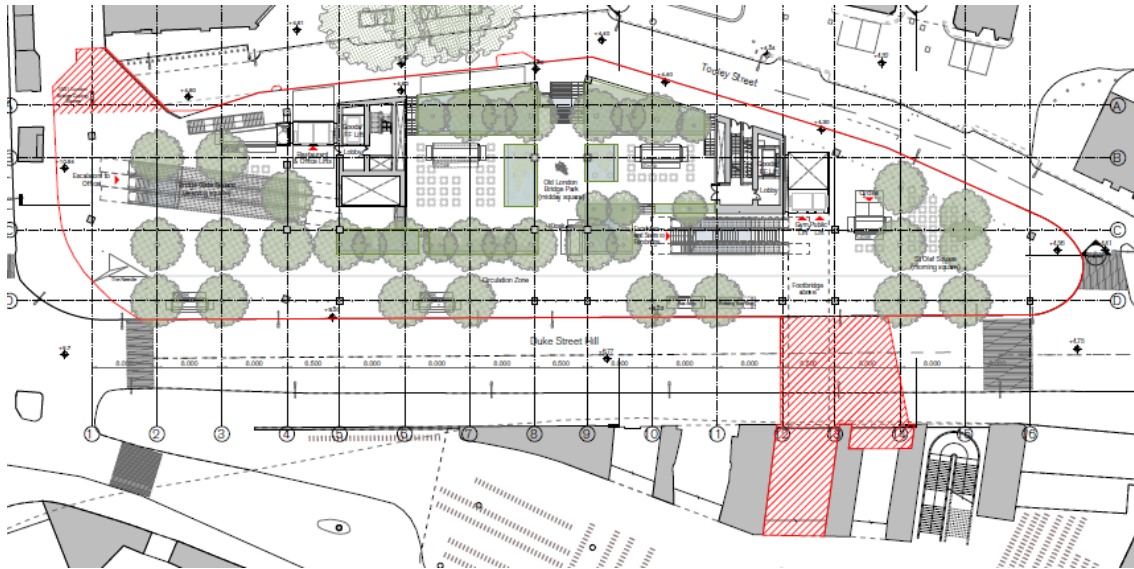
26. The proposed building would rise to 22 storeys and would be elevated above pavement level by between 11.3 metres and 18.5 metres, allowing for the creation of a new landscaped public realm beneath the elevated building on Duke Street Hill. This new public realm would provide a new landscaped open space as well as pedestrian and visual connections from Duke Street Hill through to Tooley Street to the north of the site. The footbridge to London Bridge Station would be demolished and replaced by a new footbridge, incorporated into the new development. This footbridge would be located to the eastern end of the site and would be accessed by escalators and lifts.



27. The building would rise to a maximum height of 104.2 metres (AOD) and would step down westwards to create four distinct elements. The above ground part of the building would accommodate the office space as well as a restaurant at level 11. The office space would be accessed from escalators and lifts at the western end of the side where it bounds London Bridge. The theatre, retail units, gym and all back of house functions/plant would be located at lower ground and basement levels, all of which would be accessed at grade from Tooley Street to the north of the site, taking advantage of the difference in levels between Tooley Street and Duke Street Hill. This would allow a new public realm and landscaping to be created below the elevated building as well as creating both visual and pedestrian links through the site. This is shown in detail on the image below which shows the retail and theatre entrances on Tooley Street with the new public realm on Duke Street Hill located above:



28. The development would provide a total of 815 cycle parking spaces as well as changing and showering facilities. The proposed cycle parking provision will comprise 593 long stay spaces at basement level, 160 short stay spaces and 44 long stay spaces within an automated cycle store accessed from the ground floor public realm. A further 18 short stay cycle spaces would be provided within the public realm. The scheme would be car free with the exception of a single accessible parking space that would be located within the basement and accessed from Tooley Street.



29. All servicing activity would be undertaken on-site in a dedicated service yard accessed via Tooley Street. The facility would provide three loading bays to accommodate the peak servicing demands of the proposed development. The applicant is also proposing to adopt a delivery consolidation solution to significantly reduce the number and size of vehicles travelling to the site each day.

### Consultation responses from members of the public and local groups

30. Letters were sent to local residents when the application was first received in November 2020, at this time the application was advertised as EIA development in the local press and site notices were posted. Following the submission of revised/additional information in September 2021, a re-consultation was undertaken for the application. Taking both consultations together, 154 letters of support and 14 letters of objection have been received. The comments for both objection and support are set out in the table below:

Objection	Officer response
The proposed building is too large and is out of proportion with its immediate surroundings.	It is acknowledged that the proposed building is significantly taller than the existing Colechurch House however, officers consider the scale and massing to be an appropriate response to the sites specific location within the CAZ, town centre and opportunity area. The site has been given an allocation within The Southwark Plan which states that the site is suitable for a taller building. There are also numerous examples of much taller buildings within the immediate vicinity and as such it is not considered that the building would be too tall for or disproportionate within its

	<p>surroundings. The site sits outside of the Tooley Street and Borough High Street conservation areas, and the impact on nearby heritage assets has been considered and found, on balance and with regard to the benefits of the development, to be acceptable.</p>
<p>The trees would be difficult to maintain and would be unlikely to receive enough light.</p>	<p>The applicant has provided details of tree pits, soil depth and light penetration. Officers are satisfied that the trees would have sufficient soil depth, irrigation and natural light to grow and thrive.</p>
<p>No consideration seems to have been given to scale and leaving open space which is actually open and not covered.</p>	<p>The site is long and narrow with roads and pavements on both sides. Elevating the building is considered to be an innovative and high quality solution to providing a generous space at ground floor. The design of the building is such that it maximises the amount of space given to landscaping and public realm at ground floor level.</p>
<p>The demolition of the pedestrian bridge to the upper part of the main line station would result in increased numbers crossing the road at this busy, dangerous junction, to be made more complex by the imminent introduction of cycle lanes. This would be particularly apparent during rush hours when large numbers of pedestrians flood across London Bridge to or from the stations and when traffic is busiest.</p>	<p>The applicant amended the scheme to re-provide the pedestrian footbridge. As such, pedestrian access to London Bridge Station via a footbridge would be preserved as part of the application. Mitigation for the period of construction when the footbridge would not be available, has been agreed and would be secured in the s106 agreement.</p>
<p>The proposed public realm is unlikely to be successful and could be yet another area with noisy food and (licensed) beverage contributing to anti-social behaviour.</p>	<p>The proposed public realm would be a well landscaped space that would provide new routes and visual connections. Whilst there would be some seating this is not considered to be a threat to amenity or a risk for anti-social behaviour. The site is open in nature with lots of natural surveillance and as such would enhance the street level experience in this part of London Bridge.</p>
<p>The proposed materials are</p>	<p>The proposed materials are considered</p>

inadequate for this location.	to be high quality and appropriate to the architectural style of the building providing a robust response to the detailed elevational design. Conditions regarding materials would be imposed in order to secure the highest standards.
The building is too large in the context of the surrounding listed buildings.	The significance of all the nearby listed buildings and the contribution of their urban settings to that significance has been considered. Where it is considered that there is harm arising to the setting of a number of heritage assets due to the scale and massing of the proposal and its incursion into views of heritage assets it has been recognised and considered. The harm overall is considered to be at the low end of 'less than substantial' harm as defined by the NPPF and where it can be considered in the balance against both the public benefits and the benefits inherent in the design of the building which would open up new views of the listed buildings as a result of the building being elevated above the streets. It is considered that, individually and overall, the acknowledged harm would be outweighed by the benefits of the scheme.
The proposed building is likely to cause adverse impacts due to high winds.	Wind and microclimate has been fully considered as part of the application and there would be no significant impacts as a result of the proposed development.
The development will result in very few benefits for local people and it will have significant negative impacts on local residents in terms of anti-social behaviour and pollution.	The provision of a substantial, high quality public realm, new pedestrian routes, job creation, retail opportunities and the inclusion of a new theatre are considered to be substantial public benefits.
The restaurants and bars, including that which would be ancillary to the theatre, are inappropriate in this area and would impact on local residents.	The site is located in the CAZ and within both a town centre and opportunity area. The proposed range of uses are considered entirely appropriate for the location and conditions would be used in order to manage and mitigate any potential impacts.

<p>Servicing, taxis idling and bars/restaurant entrances cannot be allowed on the northern part of the site. It will significantly affect the amenity of local residents and the patients at London Bridge Hospital.</p>	<p>Trip generation is considered in full in the transport section of this report. It is not considered that the development would generate vehicle trips that would have any adverse impact on the local road network or any adjacent or nearby occupiers. Entrances to the theatres and retail units being positioned on Tooley Street is considered appropriate and will animate what is currently a very inactive part of the Thames Path.</p>
<p>The plans will significantly affect the daylight and sunlight of local residents, the office buildings to the north and also the patients at London Bridge Hospital.</p>	<p>The application site has been identified in policy, including in the Southwark Plan, as being suitable for a taller building and it is anticipated that there would be a degree of impact as a result of redevelopment. Developing sites in highly urbanised environments often results in some unavoidable impacts to daylight and sunlight. Recognising the challenges associated with developing inner city sites, the numerical targets given in the BRE are expected to be treated with a degree of flexibility, having due regard for the existing and emerging context within which these sites are located. The application site is within a Central London Opportunity Area and accordingly the standards should be applied with some degree of flexibility.</p> <p>Given the small number of windows overall that would experience significant effects and the site specific circumstances including the nature of the affected rooms and windows, it is considered that the overall impact would be acceptable given the benefits of the proposed development, the provision of a significant new public realm, offices, theatre, retail and significant employment opportunities. On balance, officers consider that, when reading the BRE guidance with the required flexibility, and in view of the positive benefits of the development proposal, the degree of harm to amenity would not justify withholding planning permission in this case.</p>

Comments from The London Bridge Experience	
Concern that The London Bridge Experience hasn't been properly acknowledged in any of the application documents and reports and The London Bridge Experience wish to fully respected and included in all relevant applications.	The London Bridge Experience has been fully considered as part of the officer assessment of the application through review of the application documents, consideration of the impacts on the London Bridge Experience and through officer site visit.
There are concerns that the development would result in noise and vibration impacts on The London Bridge Experience and that this would disrupt operations and visitor experience.	Whilst it is acknowledged that there may be some short term impacts during the construction period, officers consider that these can be adequately mitigated by way of condition.
There are concerns that the development would affect the stability of the site and result in structural issues and movement.	There is no evidence to suggest that the development of the site would result in any structural issues or movement.
Concerns have been raised with regard to dust and debris during demolition and construction and the air quality impacts this could have on visitors.	Dust and debris would be managed through a Construction Environmental Management Plan and this would be secured either as a condition or as part of the S106 Agreement.
There are concerns that pedestrian and vehicular access could be affected during demolition and construction and that this would have adverse impacts on the operation of the business	Access on Duke Street Hill and Tooley Street would be maintained.
The removal of London Bridge Walk and the Duke Street Hill walkway could have an impact on the operation of the business both in terms pedestrian movement and bin storage	Whilst originally proposed for removal, The pedestrian footbridge would now be re-provided as part of the development. Pedestrian movement would be improved as part of the development.
The development would result in the loss of The London Bridge Experience box office on Duke Street	This is a commercial matter between tenant and landlord.

Hill and this would have an impact on the business.	
The existing staircase from Duke Street Hill to Tooley Street would be removed as part of the redevelopment and it isn't clear what other routes would be retained both during and post construction.	Whilst the staircase would be removed, new pedestrian north south routes would be provided thereby improving north south connectivity. Access along Tooley Street and Duke Street Hill would be maintained during construction.
The development would have an impact on drainage and water movement in the area and could result in water ingress to The London Bridge Experience.	The Environment Agency have reviewed the submitted Flood Risk Assessment and have raised no objections subject to conditions.
It is unclear what developer agreements are in place to improve the London Bridge tunnel.	Improvements to London Bridge Tunnel are not considered to be necessary as a result of the proposed development which will be improving the street environment on Tooley Street and Duke Street Hill.
Party wall issues.	These are not a planning matter.
<b>Comments from Shard Quarter</b>	
The proposed height, scale and massing is not proportionate to the site or its locational context and it would not make a positive contribution to the London skyline and landscape.	Officers consider that the height scale and stepped massing of the design is an appropriate and proportionate response to the site and its location, meeting the requirements of both Southwark Plan and London Plan policies. The high quality architecture is considered to make a positive contribution to the London skyline.
The development would have a harmful impact on strategic and local views and would fail to respond positively to the local character and townscape of London Bridge and the primacy of The Shard.	The effect of the proposed design has been considered both in the local and Strategic views through accurate visual representations (AVRs) as defined by the LVMF. Whilst it is acknowledged that there would be some visibility in the Strategic and local views, the effect has been assessed qualitatively and where there may be any harm identified it is considered to be of the lowest order of less than substantial and comfortably outweighed by the benefits of



	redeveloping the site. This is discussed in more detail in the main report. The height of the proposed building is significantly lower than the Shard and, coupled with its stepped profile it is not considered that the primacy of The Shard is challenged by the proposal.
The development would have a harmful impact on the Conservation Area and the setting of the adjacent listed buildings due to its height, form and massing.	In the main, the proposal is located outside the Tooley Street Conservation Area, (although at the junction of Tooley Street and Duke Street Hill it is within the Conservation Area). Due to being elevated above ground level, it would open up views of a number of listed buildings and the buildings in the conservation area especially from the south. This is considered to be a positive aspect of the design. The effect of the proposal on the setting of this urban conservation area has been considered in detail and the impact on heritage assets is discussed in more detail in the main report.
The removal of the walkway and pedestrian footbridge would have a detrimental impact on the public highway, both in terms of safety and capacity	The pedestrian footbridge has now been reintroduced.
Objection on the basis of highway capacity, which has not been fully considered.	Officers consider that the Transport Assessment and ES suitably review the issues of highway capacity/impacts.
Objection to the proposed Stopping Up.	In planning terms the proposed Stopping Up Order is considered acceptable however the applicant will have to make a formal application to Southwark Highways in order to secure a Stopping Up Order and this would be separate to any planning consent.
<b>Comments from Oblix</b>	
There is no policy support for a tall building in this location	The site benefits from an allocation in the Southwark Plan 2022 (NSP55) which states that the site is suitable for a taller building.
The proposals will fail to contribute to the London skyline and will not complement the London Bridge Tall	Proposed building is of a proportionate height and scale for its location and the standard of architecture is exemplary

<p>Building Cluster as the proposed development will be located away from the cluster on the River front, therefore jarring against the backdrop of The Shard and harming the River front views by providing a building that is out of scale with neighbouring properties. The building is too tall and would harm the primacy of The Shard.</p>	<p>and would make a positive contribution to the local townscape and the London skyline. The height of the proposed building is significantly lower than the Shard and the proposed building would very much be in the foothills of the cluster at London Bridge. As such, the primacy of The Shard is not threatened by the proposal.</p>
<p>The building fails to relate to its surroundings at street level and does not make a positive contribution to the townscape.</p>	<p>As set out above and in the main body of the report, the proposed building is considered to be suitable in terms of scale and massing, it responds positively to its surroundings at street level through the new public realm and the standard of architecture would make a positive contribution to the townscape.</p>
<p>The height of the building is not proportionate to the significance of the location and the size of the site nor does the development respond positively to the local character and townscape.</p>	<p>Officers consider that the height scale and massing is proportionate to the site and its location, meeting the requirements of both Southwark Plan and London Plan policies. The high quality architecture is considered to make a positive contribution to the townscape.</p>
<p>The HTVIA is not a robust document and Southwark should place little weight on it when assessing the impacts of the Proposed Development.</p>	<p>Officers consider the HTVIA to be a robust document, this was also reviewed independently on the Councils behalf by Land Use Consultants. Officers therefore consider it to be an appropriate detailed and robust document.</p>
<p>The proposed development will harm the significance of a number of designated heritage assets including St Paul's Cathedral, Tower of London and Southwark Cathedral.</p>	<p>Whilst it is acknowledged that there would be some harm to strategic and local views, the harm is considered to be less than substantial and comfortably outweighed by the benefits of redeveloping the site. This is discussed in more detail in the main report.</p>
<p>The proposed development would harm views from Oblix restaurant within the Shard and will affect the vitality and viability of the restaurant.</p>	<p>There is no entitlement to a view over a third party's land.</p>
<p>The proposed development would significantly impact the useable area of Oblix restaurant where tables can be located, damaging the restaurant's unique selling point and directly affecting revenue.</p>	<p>It is a commercial choice for the operators of Oblix restaurant how they choose to locate tables and organise their space however the issue of views out from the restaurant is not a planning matter as there is no entitlement to a view over a third party's land and the</p>

	development site is located a sufficient distance away to ensure that Oblix is not enclosed.
The proposals provide very little in the way of active frontages. The ground floor commercial units deliver only small kiosk uses which provide for very little active street level uses particularly along the Duke Street Hill. There is a risk of anti-social behaviour.	The proposal would result in active frontages along a stretch of Tooley Street that currently has very little in the way of animation. The new public realm would open out onto Duke Street Hill and would greatly improve the street level experience of this part of London Bridge.
<b>Comments in support</b>	
<ul style="list-style-type: none"> <li>• The inclusion of a theatre will serve the community very well for years to come.</li> <li>• The Southwark Playhouse does great work, not only supporting the arts and culture industry, but also working with the local community, creating employment opportunities, and attracting new people to the area.</li> <li>• The Southwark Playhouse is an important cultural and community hub. It would be a valuable addition to the area.</li> <li>• The plans are hugely exciting and will open new opportunities for this area of London Bridge, which is currently quite a depressing space particularly at night time.</li> <li>• The development is modern and sustainable and it introduces green space to the area.</li> <li>• The building also has the benefit of making the street level open for public access.</li> <li>• The facilities look amazing and it will bring cultural life to the area.</li> <li>• The restaurant offering is very welcome as the area, although busy, is poorly served apart from takeaways.</li> <li>• Whilst the station itself has undergone a welcome transformation the surrounding area is poor and quite threatening at night. This new development is uplifting and offers hope for this extremely busy spot.</li> <li>• The plans will create a fantastic new building at the gateway to London Bridge.</li> <li>• There is a lot to support in the plans, and in particular the new park, affordable venue for Southwark Playhouse theatre and the net-zero carbon design of the building. The idea of putting the building up in the air and giving back the street level to the public is great.</li> <li>• The redevelopment and replacement of Colechurch House is long overdue. The proposed development will enhance the area.</li> <li>• The different parks underneath the building are a godsend to local office workers</li> <li>• The opening up of a view of art deco St Olaf's House from Duke Street Hill/Tooley Street is a great benefit.</li> <li>• London Bridge has changed greatly since 2000 and this is a continuation in the right direction.</li> <li>• Fosters &amp; Partners are world class architects and this is a dramatic leap forward for the area.</li> <li>• The garden will be welcomed as will the new office space.</li> </ul>	

- This has similarities to the Bloomberg building in the city and is very welcome.
- It is rare to see such a beautifully crafted facade developed so intelligently and scientifically for each aspect.

### **Planning history of the site, and adjoining or nearby sites.**

31. Any decisions which are significant to the consideration of the current application are referred to within the relevant sections of the report. A fuller history of decisions relating to this site, and other nearby sites, is provided in Appendix 3.

## **KEY ISSUES FOR CONSIDERATION**

### **Summary of main issues**

32. The main issues to be considered in respect of this application are:
- Principle of the proposed development in terms of land use and compliance with the site allocation NSP55;
  - Affordable workspace
  - Environmental impact assessment
  - Design, including layout, building heights, landscaping and ecology;
  - Heritage considerations
  - Archaeology
  - Impact of proposed development on amenity of adjoining occupiers and surrounding area, including privacy, daylight and sunlight
  - Transport and highways, including servicing, car parking and cycle parking
  - Environmental matters, including construction management, flooding and air quality
  - Energy and sustainability, including carbon emission reduction
  - Ecology and biodiversity
  - Planning obligations (S.106 undertaking or agreement)
  - Mayoral and borough community infrastructure levy (CIL)
  - Consultation responses and community engagement
  - Community impact, equalities assessment and human rights
  - All other relevant material planning considerations
33. These matters are discussed in detail in the 'Assessment' section of this report.

### **Legal context**

34. 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 and the Southwark Plan 2022. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers determining planning applications for development within Conservation Areas to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

Section 66 of the Act also requires the authority to pay special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest which they possess.

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

### **Planning policy**

36. The statutory development plans for the Borough comprise the London Plan (2021) and The Southwark Plan (2022). The National Planning Policy Framework (2021) is a material consideration but is not part of the statutory development plan. A list of policies which are relevant to this application is provided at Appendix 3. Any policies which are particularly relevant to the consideration of this application are highlighted in the report.

#### Policy designations

37. The site is subject to the following policy designations:
- Air Quality Management Area
  - Bankside, Borough and London Bridge Opportunity Area
  - Central Activities Zone
  - London Bridge District Town Centre
  - Protected Shopping Frontage SF12
  - Strategic Cultural Area
  - Thames Policy Area

#### Site allocation NSP55

38. The application site benefits from an allocation within the Southwark Plan 2022. Allocation NSP55 refers specifically to the application site and requires redevelopment to:
- Provide at least the amount of employment floorspace (E(g), B class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater; and
  - Contribute to a vibrant pedestrian area with retail, community or leisure uses (as defined in the glossary) which create an active street frontage; and
  - Provide a high quality pedestrian environment which links to London Bridge and the Thames Path; and
  - Provide ground floor active frontages on Duke Street Hill, including retail, community or leisure uses (as defined in the glossary).

NSP 55 sets out that the site is suitable for a taller building, subject to a range of considerations, including its location within the Thames Policy Area.

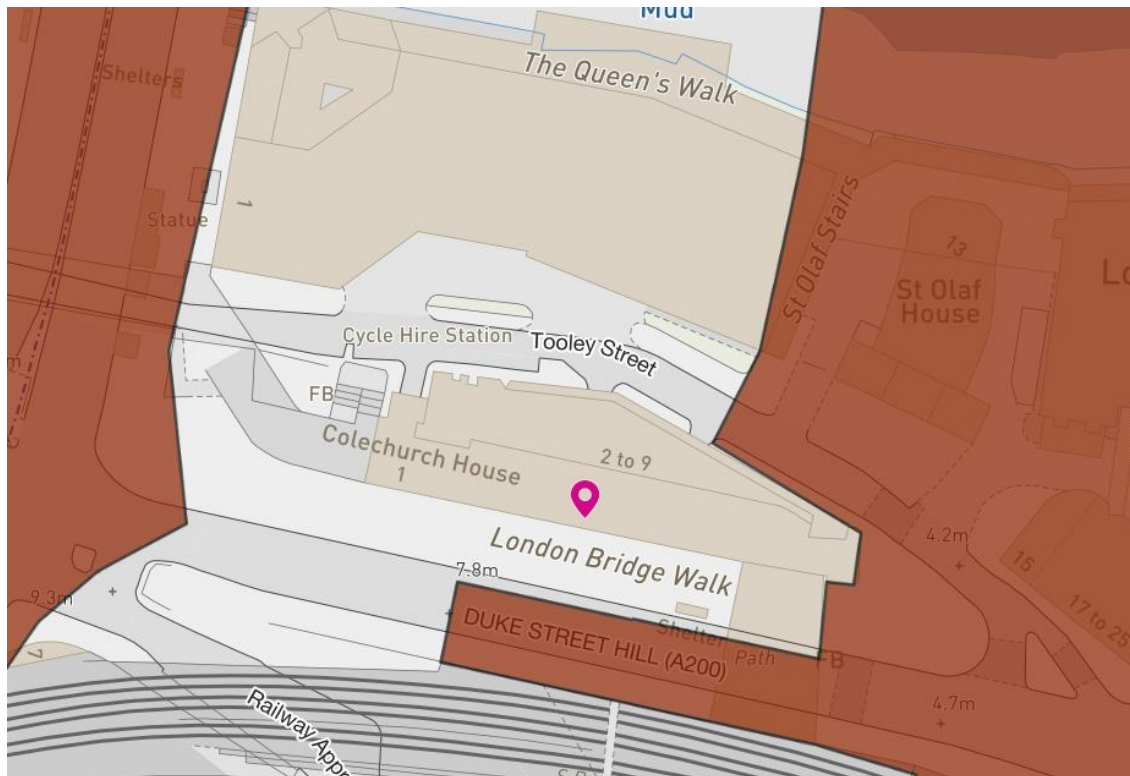
39. The site is located within Flood Zone 3 as identified by the Environment Agency flood map, which indicates a high probability of flooding however it benefits from

protection by the Thames Barrier.

### Conservation areas

40. A small section of the eastern end of the application site at the apex of Duke Street Hill and Tooley Street is located within the Tooley Street Conservation Area. The Borough High Street Conservation Area flanks the western boundary of the site.

Image – Conservation areas (brown)



### Listed Buildings

41. The existing Colechurch House is not listed however the following listed buildings are in close proximity to the site:
- Southwark Cathedral (Grade I);
  - St Olaf House (Grade II\*);
  - London Bridge Hospital Riverside Block and 17-25 Tooley Street (Grade II);
  - Denmark House, 15 Tooley Street (Grade II);
  - 29, 31, 33 Tooley Street (Grade II);
  - Bridge over London Bridge Station (Grade II);
  - Archway of old London Bridge on Tooley Street (Grade II);
  - Hibernia Chambers (Grade II); and
  - 4, 6, 8 and 10 Borough High Street (Grade II).

### London View Management Framework protected views

42. • View 2A.1 – Parliament Hill to St Paul's Cathedral

- View 3A.1 - Kenwood Gazebo to St Paul's Cathedral
- Tower of London World Heritage Site

## ASSESSMENT

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

#### Relevant policy designations

43. The redevelopment of the site would be office led and would generate a significant uplift in employment floorspace as well as a significant cultural offering in the form of the proposed theatre. The development also proposes retail use, a gym, food and beverage outlets and an extensive new public realm. The new public realm would significantly improve the street level experience of this area and would improve animation, activity and interest at street level in addition to improving pedestrian connectivity and legibility.

#### *CAZ, District Town Centre and Opportunity Area*

44. The National Planning Policy Framework (NPPF) was updated in 2021. At the heart of the NPPF is a presumption in favour of sustainable development. The framework sets out a number of key principles, including a focus on driving and supporting sustainable economic development. Relevant paragraphs of the NPPF are considered in detail throughout this report. The NPPF also states that permission should be granted for proposals unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.
45. London Bridge is part of the London Central Activities Zone, the Bankside, Borough and London Bridge Opportunity Area and the London Bridge District Town Centre. London Bridge has the potential to grow its strategic office provision, shops, leisure, culture, science and medical facilities. The site allocations in London Bridge will deliver around 57,000sqm (gross) offices and employment workspaces, 2,100sqm (gross) retail, community and leisure floorspace and up to 10,000 new jobs.

#### *London Bridge Area Vision*

46. The site is located within AV.11 – London Bridge Area Vision. Development in London Bridge Should:
- Attract global commerce with headquarter and local offices and build on its reputation for arts and crafts, food and trade while serving local needs through its town centre role;
  - Support the creation of a distinctive and inspiring world class environment through a mix of inspiring new architecture, restored and reactivated warehouses and other heritage revealed with 'placemarks', public art and quality public realm that provides openness, connectivity and a 'green grid'. Greenery and innovations in environmental resilience should be incorporated into buildings;

- Build on the fabric of local alleyways and yards to create quiet, green routes with clean air;
- Strengthen the cultural offer of the area and diversify activities and shops;
- Make sure the new standard of London Bridge Station is upheld and the Shard remains significantly taller and more visible than surrounding buildings as the station's landmark;
- Improve local accessibility and interchange at the station with enhanced walking, cycling, tube, bus and boat routes;
- Contribute towards the development of the Low Line, a new public realm corridor adjacent to historic railway arches, with lively accessible spaces for creativity, new jobs and retail;
- Harness the expertise and infrastructure from Kings College London, Guy's Hospital and other medical and science facilities to develop a strong, dynamic and specialised local economy that will attract new specialised services and research and promote health and wellbeing in the local environment.
- Enhance the sense of place and visitor and cultural activities along the Thames riverfront, and encourage use of riverboat services, waterborne freight and the Thames Path in a safe and sustainable way;
- Support the development of vibrant new high streets on St Thomas Street, Crucifix Lane and Tooley Street, complementing the distinct character of nearby Bermondsey Street.

#### *Southwark Plan Site Allocation NSP55*

47. The site benefits from a site allocation within The Southwark Plan. NSP55 which covers the site, states that development must:
- Provide at least the amount of employment floorspace (E(g), B class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater; and
  - Contribute to a vibrant pedestrian area with retail, community or leisure uses (as defined in the glossary) which create an active street frontage; and
  - Provide a high quality pedestrian environment which links to London Bridge and the Thames Path; and
  - Provide ground floor active frontages on Duke Street Hill, including retail, community or leisure uses (as defined in the glossary).

#### *Conclusions on policy designations*

48. The principle of a development containing a mix of uses including Class E office space, Class E retail, Class E restaurant/café, Class E gym and Sui Generis theatre with ancillary bar would support the role and functioning of the Central Activities Zone, the London Bridge District Town Centre as well as being consistent with the policies for the Opportunity Area and the site allocation. The acceptability of each use will be considered below.

#### Offices

49. Promoting the economy and creating employment opportunities is a key priority



for the planning system. The site lies within a London Plan Opportunity Area (Policy SD1) and within a District Town Centre (Policy SD6). London Plan Policy GG5 requires local planning authorities to plan for sufficient employment and industrial spaces to support economic growth whilst Policies E1 and E2 deal specifically with the provision of B Use Class (now called Class E(g) since the change to the Use Classes Order in 2021). London Plan Policy E11 requires development proposals to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases.

50. Southwark Plan Policy SP4 seeks to ensure that Southwark can develop a strong, green and inclusive economy. To achieve this the development plan aims to deliver at least 460,000sqm of new office space between 2019 and 2036 (equating to around 35,500 jobs). The policy states that around 80% of new offices will be delivered in the Central Activities Zone and sets a strategic target of 10,000 new jobs for the Borough, Bankside and London Bridge Opportunity Area. Policy SP4 further requires 10% of all new employment floorspace to be affordable workspace for start-ups and existing and new small and independent businesses in Southwark. Finally, the policy identifies the CAZ and district town centres as appropriate for delivering approximately 19,670sqm of retail floorspace.
51. The aforementioned London Plan and Southwark Plan policies support the provision of a commercial led development on this site. The existing Colechurch House provides approximately 4,993sqm of office employment floorspace and supports approximately 165 jobs. However, the building is in poor condition and in its current state is unlikely to attract new tenants. The proposed development would provide 43,925sqm (GIA) of Class E(g) office floorspace that would have the potential to support up to 3,050 jobs. This represents an uplift in office employment floorspace of approximately 38,932sqm and an increase in the number of jobs by approximately 2,885 full time positions. This uplift in employment floorspace and job provision would satisfy the aims of the London Plan and the Southwark Plan in creating new jobs and high quality office space within the Central Activities Zone, the Bankside, Borough and London Bridge Opportunity Area and the London Bridge Town Centre and is a welcome benefit of the development.

### Retail, food & drink and gym

52. London Plan Policy SD6 and Southwark Plan policies identify this site as being within a town centre. The existing building provides 1,569sqm of retail floorspace however this is largely poor quality and located within the elevated walkway which has little beneficial impact on the vitality of the surrounding retail area and protected shopping frontage.
53. The proposed development would provide 465sqm of retail space, 691sqm of restaurant/café space and 366sqm of leisure floorspace, all of which fall within Class E. This equates to an overall provision of 1,522sqm of floorspace. Whilst this would represent a minor 47sqm reduction in retail floorspace provision, it should be noted that the proposed Class E accommodation would be high quality and would contribute more positively to the vitality and viability of the surrounding retail environment than the current Colechurch House.

54. In line with Southwark Plan Policy P37 – Protected Shopping Frontages, the development would provide active ground floor uses that provide a service to the general public and would enhance the shopping frontage. Due to the elevated nature of the building, the retail frontages would be on Tooley Street as opposed to Duke Street Hill however this is considered to be acceptable as the frontages would activate a busy portion of Tooley Street that forms part of the Thames Path but currently has very little animation or activation whilst providing a high quality public realm and landscaped area onto Duke Street Hill. The retail provision would be appropriate for this location in accordance with the aforementioned policies. Given the town centre location, the range of appropriate uses set out in the site allocation and national Government's clear intention to allow flexibility for commercial uses this is considered to be appropriate.

### Theatre

55. The development would provide a new theatre (2696sqm) with ancillary bar (20sqm). The theatre would have two venues of different capacities, 250 people for the main theatre and 150 for the second theatre where both are proposed to have flexible a configuration. It is intended that it would be operated by Southwark Playhouse. London Plan policy HC5 supports the development of new cultural venues in town centres and places with good public transport connectivity. This policy seek to ensure that Opportunity Areas and large-scale mixed-use developments include new cultural venues. Southwark Plan policy P46 states that development will be permitted where:
- New leisure, arts and cultural uses are provided; and
  - It delivers or supports the delivery of public art projects, independent museums and theatres; and
  - New arts and cultural venues of strategic significance are proposed within the South Bank Cultural Quarter, Elephant and Castle Cultural Quarter, Old Kent Road and Canada Water Opportunity Area Cores and Peckham and Camberwell Creative Enterprise Zone.
56. The application site is located within the Strategic Cultural Area and more specifically within the South Bank Cultural Quarter. The provision of a theatre in this location would bolster Southwark's thriving leisure, arts and cultural sector. Promotion of new cultural facilities and specifically a theatre would allow Southwark to build on its strengths and further enhance the vibrant arts, leisure and cultural scene. This would bring further employment, engage local people and visitors, and create opportunities for training and learning. The delivery of a theatre is fully supported by both London Plan and Southwark Plan policies and is considered to be a positive element of the scheme that would enhance the cultural offering in this vibrant part of London.

### Conclusion on land use

57. The proposal involves the provision of high quality office floorspace alongside retail, leisure and theatre space which are acceptable town centre uses. The provision of new offices is fully supported and the provision of modern, high quality offices is considered to be a benefit of the scheme and would facilitate

the growth of employment within the Central Activities Zone and the Opportunity Area. The proposed development would include a mix of uses that are appropriate for the site's location within the CAZ, Opportunity Area, town centre and cultural quarter.

### Affordable workspace

58. London Plan Policy E2 requires the provision of a range of low-cost Class B1 business space to be supported to meet the needs of micro, small and medium sized enterprises and to support firms wishing to start up and expand. The policy states “development proposals for new B1 business floor space greater than 2,500sqm, or a locally determined lower threshold in a local development plan document, should consider the scope to provide a proportion of flexible workspace suitable for micro, small and medium sized enterprises.
59. Policy E3 of the London Plan deals specifically with affordable workspace. The policy states “In defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purposes”. The policy identifies the circumstances in which it would be appropriate to secure affordable space.
60. Southwark Plan Policy P31 deals with affordable workspace. Criterion 2 of the policy requires Major ‘B Use Class’ development proposals to deliver at least 10% of the floorspace as affordable workspace on site at a discounted market rent for a period of at least 30 years. The policy recognises that there are many different forms that such space could take depending on the site location, characteristics and existing/proposed uses on site. The space should be offered to existing business on site first and then small and independent local businesses. Only where on-site provision would be impracticable are developers permitted to make a payment in lieu of the on-site provision.
61. In exceptional circumstances affordable retail, affordable cultural uses, or public health services which provide a range of affordable access options for local residents, may be provided as an alternative to affordable workspace (employment uses). This will only be acceptable if there is a demonstrated need for the affordable use proposed and with a named occupier. If the alternative affordable use is no longer required in the future, the space should be made available for affordable workspace (employment uses).
62. The proposed development would provide a total of 46,831sqm of employment floorspace and as such a total of 4,683sqm of affordable workspace should be provided in order to comply with planning policy.
63. The applicant proposed to satisfy the affordable workspace offer through the provision of an affordable retail unit, an affordable Class E (g) office space and through providing the theatre as an alternative to affordable workspace. This would be broken down as follows:

Use	Floorspace (sqm)
Theatre (inc ground floor kiosk)	2,703
Class E(g) office space	791

Retail/Restaurant unit	162
Total (inc 2% of communal areas)	3,744

65. In floorspace terms the proposed offer equates to 8%. Policy P31 does allow for a commuted sum in exceptional circumstances. The 2% affordable workspace shortfall would equate to approximately 939sqm. This would need to be provided within the main office building and would take up a small portion of one of the typical officer floors. It would be difficult to find an affordable workspace provider who would be able to manage such a space given the increased service charges that would likely be applied and the fact that it would be separated from the rest of the affordable Class E(g) floorspace. In this instance, given the configuration of the building, the principle of a commuted sum is considered acceptable.
66. The required commuted sum would work out at £2,220,350. However, the applicant is proposing to offer the theatre to Southwark Playhouse at £160,000 per year which would result in a 78% discount on market rent. Additionally, the developer is proposing to fit out the theatre to a specification agreed with Southwark Playhouse. This would result in an additional cost to the developer of approximately £2,660,000 and as such the developer is proposing that no commuted sum be payable in this case due to the fit out costs of the theatre and the significant discount on market rent of the theatre space. Officers consider the provision of a community based theatre in this location to be a significant benefit of the scheme and would assist in the relocation of a well-regarded local theatre group back to London Bridge. The fit out of the theatre space in lieu of a commuted sum is also considered acceptable in this instance and the costs of the fit out would far exceed the commuted sum and would minimise costs to Southwark Playhouse.
67. In terms of the remainder of the affordable workspace offer, the Class E(g) office space and affordable retail unit would be offered at a 75% discount on market rent with relevant stair casing from a peppercorn rent to the 75% level over the course of a 24 month period as set out below:
- 0-6 months at 100% discount (rent free period);
  - 7-13 months at 60% discount on the Local Open Market Rent;
  - 14-22 months at 40% discount on the Local Open Market Rent; and
  - From month 23 onwards at 75% of the Local Open Market Rent.
68. In addition, the Section 106 Agreement would include an Affordable Workspace Strategy. This would ensure, among other things, that:
- the workspace is provided for a 30-year period at the discounts set out above;
  - no more than 50% of the market rate floorspace can be occupied until the affordable workspace has been fitted-out ready for occupation;
  - updated costs and schedules for the fit out of the theatre including final costs and the requirement for any balancing payments should the fit out costs not exceed the commuted sum;
  - an updated affordable workspace strategy setting out contingency plans for the conversion of the theatre space to general Class E(g) affordable

workspace should Southwark Playhouse ultimately decide not to take on the space;

- detailed plans showing final location of affordable workspace;
- a management plan is in place to secure the appointment of a Workspace Provider and a methodology for that Provider to support the occupiers;
- appropriate marketing of the affordable workspace will be conducted; and
- the rates and service charges payable by the tenant will be capped.

## **Environmental impact assessment**

69. Environmental Impact Assessment is a statutory procedure that provides for a process assesses and reports upon the beneficial and adverse (positive and negative) environmental effects of development projects. The proposed development falls within Schedule 2, Category 10(b) 'Urban Development Project' of the EIA Regulations 2017 and constitutes EIA development having regard to its potential for likely significant environmental effects
70. Regulation 3 of the EIA Regulations precludes the granting of planning permission unless the council has undertaken an environmental impact assessment, taking account of the environmental information, which includes the ES, any further information, any representations made by consultation bodies, and any other person, about the environmental effects of the development.
71. In accordance with the EIA regulations, an environmental statement (ES) comprising a non-technical summary, environmental statement and technical appendices accompanies the application. That information has been taken into account. Officers are satisfied that the ES is up to date and that the effects described in the ES properly identify the likely significant effects of the proposed development on the environment.

## **Alternatives**

72. The EIA Regulations require the ES to provide information on the alternative options considered by the applicant and this includes a 'Do Nothing' scenario. It is stated by the applicant's consultants and accepted by officers that the 'Do Nothing' alternative would leave the application site in its current state. It should be noted that it has also been established in the Southwark Plan that the site represents an opportunity to redevelop a currently underutilised parcel of land in the heart of London to provide a sustainable and high quality office space, food/retail, cultural provision and public realm.
73. The 'Do Nothing' scenario is considered to have no environmental benefits compared with the proposed redevelopment of the site as the 'Do Nothing' scenario would leave an allocated sustainable, brownfield site in central London under used and would not bring forward the various benefits associated with development such as improved public realm and employment opportunities.
74. No alternative sites or locations have been considered for the proposed development as the site benefits from a site allocation and policy support to deliver a strategic development in this location.
75. The ES also describes the design evolution of the scheme which has been

influenced by environmental factors, particularly site connectivity; townscape and heritage; LVMF Views; wind; daylight, sunlight and overshadowing; ecology and biodiversity. As such, the final version of the scheme has been designed having full regard to the constraints and opportunities presented by the site as well as issues raised during the process.

### *Cumulative impacts*

76. The ES considers cumulative effects arising from the proposed development in combination with other surrounding consented and planned developments and where relevant these effects are discussed further in the topic specific chapters later in the report.
77. A detailed assessment of the likely potential and residual impacts of the scheme is provided in the relevant sections of this report, taking into account the ES and the material planning policy considerations. In summary, officers are satisfied that the ES is adequate to enable a fully informed assessment of the environmental effects of the proposal.

### **Design**

78. The NPPF stresses that good design is a key aspect of sustainable development and is indivisible from good planning (paragraph 124). Chapter 3 of the London Plan seeks to ensure that new developments optimise site capacity whilst delivering the highest standard of design in the interest of good place making. New developments must enhance the existing context and character of the area, providing high quality public realm that is inclusive for all with high quality architecture and landscaping. The importance of good design is further reinforced in the Southwark Plan Policies P13 and P14 which require all new buildings to be of appropriate height, scale and mass, respond to and enhance local distinctiveness and architectural character; and to conserve and enhance the significance of the local historic environment. Any new development must take account of and improve existing patterns of development and movement, permeability and street widths; and ensure that buildings, public spaces and routes are positioned according to their function, importance and use. There is a strong emphasis upon improving opportunities for sustainable modes of travel by enhancing connections, routes and green infrastructure. Furthermore all new development must be attractive, safe and fully accessible and inclusive for all

### Site context

79. London Plan Policy D3 requires developments to make the most efficient use of land to optimise density, using an assessment of site context and a design-led approach and this is reflected in Southwark Plan Policy P18.
80. The proposal involves the comprehensive redevelopment of the site at the eastern end of Tooley Street/Duke Street Hill. The site currently includes a seven storey concrete commercial building (constructed in the 1970s). A small strip of the eastern edge of the site is in the Tooley Street conservation area and the Borough High Street conservation area lies adjacent to the western site boundary. There are several listed buildings in the immediate vicinity of the site including the Grade II listed St Olaf's House and London Bridge Hospital which

are both located on Tooley Street to the north. The Grade I listed Southwark Cathedral is located further away to the west on the other side of London Bridge and Borough High Street. The report assesses the impact of these proposals on all affected heritage assets below. The immediate context of the site is varied, characterised by principal pedestrian and vehicular routes as well as major rail infrastructure at London Bridge Station.

81. The site falls within the Central Activities Zone (CAZ) and the Bankside, Borough and London Bridge (BBLB) Opportunity Area that are characterised in this location by a rich mix of historic and modern buildings, streets and places; the vibrancy and diversity of its uses; and by landmark buildings and infrastructure, including most noticeably the Shard, which dominates the skyline with its monumental scale and outstanding architecture. The Shard forms the central and tallest element of a group of tall buildings clustered around the station with further tall buildings such as Fielden House and News International consolidating the cluster.

### Site layout

82. London Plan Policy D8 requires new developments to create well designed, accessible, safe, inclusive attractive and well-connected public realm where appropriate. The policy sets out a range of criteria which new public realm should address. In respect of site layout and public realm Southwark Plan Policy P13 requires developments to ensure that the urban grain and site layout take account of and improve existing patterns of development and movement, permeability and street widths; to ensure that buildings, public spaces, open spaces and routes are positioned according to their function, importance and use and to ensure that a high quality public realm that encourages walking and cycling and is safe, legible, and attractive is secured. Landscaping must be appropriate to the context, including the provision and retention of street trees and use of green infrastructure. The detailed design of all areas of public realm must be accessible and inclusive for all ages and people with disabilities as well as providing opportunities for formal and informal play and adequate outdoor seating for residents and visitors.
83. The proposed site layout and building footprint is rational and legible. This is reinforced not only in the built form but in the new central and site wide public realm, providing a high quality public open space with high levels of access and informal surveillance.
84. The building is positioned in an east west alignment, following the line of both Tooley Street and Duke Street Hill to the north and south respectively which serves to reinforce the street pattern and urban form. The building is tallest at its eastern edge and progressively steps down eastwards in response to heritage views and the London Bridge cluster and would comprise a foothill building on the periphery of the cluster meeting the requirement set out in the NSP London Bridge Vision AV.11 that development should “Make sure that the new standard of London Bridge Station is upheld and the Shard remains significantly taller and more visible than surrounding buildings as the stations landmark;”. The building would be raised above ground in order to provide a site wide public realm and pedestrian routes through the site. This would address the requirement of Policy P17, 2. 6. Tall Buildings to provide a functional open space that is appropriate to

the height and size of the building and to policy P17, 2.5 which requires tall buildings to respond positively to local character and townscape as it would open up views of the listed buildings to the north on Tooley Street.

### Height scale, massing and tall buildings

85. London Plan Policy D9 deals with tall buildings. The policy sets out a list of criteria against which to assess the impact of a proposed tall building (location/visual/functional/environment /cumulative). London Plan Policy D4 requires that all proposals exceeding 30 metres in height must have undergone at least one design review or demonstrate that they have undergone a local borough process of design scrutiny.
86. Southwark Plan Policy P17 deals with tall buildings. The policy sets out a list of requirements for tall buildings. The policy states that tall buildings must:
1. Be located at a point of landmark significance; and
  2. Have a height that is proportionate to the significance of the proposed location and the size of the site; and
  3. Make a positive contribution to the London skyline and landscape, taking into account the cumulative effect of existing tall buildings and emerging proposals for tall buildings; and
  4. Not cause a harmful impact on strategic views, as set out in the London View Management Framework, or to our Borough views; and
  5. Respond positively to local character and townscape; and
  6. Provide a functional public space that is appropriate to the height and size of the proposed building; and
  7. Provide a new publicly accessible space at or near to the top of the building and communal facilities for users and residents where appropriate

#### *Point of landmark significance*

87. A point of landmark significance is where a number of important routes converge, where there is a concentration of activity and which is or will be the focus of views from several directions. In this case the site, located at the confluence of Duke Street Hill / Tooley Street and the southern bridgehead of London Bridge is at a historic point of landmark significance not just for the borough, but also for London being at the primary crossing to the City of London from the south. It also provides one of the primary access points to London Bridge station, a strategically important transport hub.

#### *Height proportionate to significance of the location and size of the site*

88. Its location one block back from the foreshore and within the London Bridge Opportunity Area as defined by the GLA means that introduces height in a layered way behind the established development at the River edge. The proposed design also responds to its landmark location by stepping down from east to west to better reflect the historic scale and open character at the crossing when viewed from the River. In this way the proposal has responded appropriately to this landmark location with the design sculpted to reflect its sensitive historic context.



89. Set at 104m in height it is around a third of the height of the Shard nearby and is considered a 'foothill' building to its 300m plus prominent neighbour. In this respect, the proposal reflects its location within the London Bridge cluster, contributing to but not challenging the primacy of the Shard. It achieves this by remaining low at its western end – closest to the axis of London Bridge and the Grade I Listed Southwark Cathedral – and rising to its peak at the eastern end – closest to the Shard – where it is no taller than around a third the height of the Shard and with an articulated massing that is noticeably lesser than the combined Fielden House and News International buildings also visible in most approaches, reinforcing its role and position as a 'foothills' building. It is important to note that this is not just a function of the numerical absolute height of the building in relation to the height of the Shard. Critical to the buildings design is its careful consideration of its form and modelling in long, medium and short views within the wider city townscape, including axial views along London Bridge, Borough High Street and Tooley Street. Officers have worked with the developer to achieve revisions to the scheme that have ensured the relationship with the London Bridge cluster and the Shard meet the requirements of both AV.11 London Bridge Vision and P17 Tall Buildings. Consequently the height of the building is carefully moderated and sculpted around its sensitive location largely outside, partly inside and adjacent to conservation areas. As a consequence the proposed design is considered to be set at a height that is proportionate to the significance of the proposed location and the size of the site.

*Positive contribution to the London skyline*

90. The area immediately around London Bridge Station has been transformed since the construction of the Shard and a number of developments immediately around it. The site, which is an NSP allocation site NSP55 is considered "suitable for taller buildings" providing those taller buildings do not detract from the primacy of the Shard and subject to "considerations of impacts on existing character, heritage and townscape. The design is mannered and defined by three key characteristics: its elevation (with tree-like stilts) from the street; its division into four slender and stepped blocks each crowned by a light-weight frame; and its deeply recessed glazed gaps between each stepped block and prow-like ends. In this way the proposal has form and silhouette that gives it a strong architectural identity - recognisable from various approaches and intended to make a positive contribution to the London skyline and landscape.
91. Due to the long slender plan of the building the initial concern from officers was that the building would appear slab-like, potentially dominating views especially from the north or south. In effect, with its highly articulated form which steps down from 23 storeys, to 20, 17 and 14 storeys (east to west) the form is highly sculpted and articulated. At its western end the light-weight frame becomes an open terrace and the building appears to steps down further to 11-storeys to align more closely with the 1 London Bridge.
92. In this way the building profile reflects how the design has adapted to respond to its context. It takes a form that echoes the profile of the London Bridge cluster, with the tallest buildings located immediately around the Shard and more modest heights around the foothills of the cluster and particularly beyond the immediate cluster where heights respond to the conservation areas. In this way the design

is considered appropriate, taking into account the cumulative effect of existing tall buildings nearby.

*Not cause a harmful impact on strategic, LVMF or borough views*

93. The application is accompanied by a TVIA which provides detailed and zoomed views of viewpoints within the LVMF, Important Borough Views and wider townscape views. In these instances views are considered both in their own right to chart the townscape impact of the proposed design, and separately to recognise any harm caused. The impact on all views will be considered further in the heritage section below. In conclusion, whilst there would be some harm to views as a result of the tall building, the harm is considered to be less than substantial.
94. Five key areas have been assessed as part of the TVIA:
1. Tower of London World Heritage Site;
  2. LVMF Views 2A.1 from Parliament Hill and 3A.1 from Kenwood House
  3. Views of Southwark Cathedral;
  4. River view from London Bridge; and
  5. Views from Borough High Street.
95. These views are considered in the context of the policy and how they contribute to the significance of heritage asset and the impact of the development on all of these views will be considered further in the heritage section below. The NPPF sets out in paras 193-196 the need to give great weight to the conservation of the heritage asset (and the more important the asset, the greater the weight); evaluate the extent of harm or loss of its significance; generally refuse consent where harm is substantial; and, where necessary, weigh this harm against the public benefits of the scheme. Para 203 goes on to advise taking into account the effect of a scheme on the significance of a non-designated heritage asset. With regard to the tested views, whilst there would be some harm resulting from the development, the harm is considered to be less than substantial and outweighed by the public benefits. This is set out in more detail in the heritage section below.

*Respond positively to local character and townscape*

96. The majority of the site is not within a conservation area, but as noted earlier that part at the junction of Tooley Street with Duke Street Hill is within a conservation area and, there are conservation areas bounding the site and a number of listed buildings in close proximity. The surrounding townscape is varied both in terms of architectural style and scale, with heights range from the tall buildings at The Shard, News International, Fielden House and Guys Hospital Tower forming a clear cluster, and to the lower rise buildings along Tooley Street and Borough High Street Reflecting their location within conservation areas. Large scale modern commercial buildings are also found at More London. The proposed development sits within the wider area of the cluster focussed around London Bridge station but has been designed to carefully reflect its position on the periphery of the cluster, maintaining the Shard as the significantly taller and more visible central, point of this cluster. The architectural design and materials proposed would successfully integrate with both the modern commercial

developments and the richness of the heritage buildings that are located close to the site. In addition by lifting the building up it would better reveal adjacent listed buildings on the north of Tooley Street (can you state which ones please, I believe London Bridge Hospital and St Olafs House) as referenced in para 76. In this respect the development would respond positively to the local character.

*Provide a functional public space*

97. A key design feature and one of the public benefits of the scheme is the ground floor public space and garden. To achieve this the entire building has been raised on V-shaped stilts and the result is a landscape that will extend from Duke Street Hill to Tooley Street. The area involves a significant change of levels as Duke Street Hill rises to meet the Bridge and Tooley Street extends beneath and the landscape is designed around this to provide accessible routes across with steps, ramps and access platforms integrated seamlessly into the landscape.
98. The information submitted with the application demonstrates that, due to the low established scale and wide proportions of the station approach to the south, coupled with the substantial height of this space, the degree of solar penetration, even in winter, will ensure that the landscape will benefit from good exposure to sunlight. The devotion of much of the ground floor to landscape offers the prospect of a development that is both well lit and landscape led.
99. Further, the landscape will not only provide mature planting, trees and lush greenery and a place to sit, but it will also accommodate the commuting public moving to and from London Bridge Station. The station bridge will be re-provided as an elegant slender feature with escalators from Duke Street Hill. The removal of the existing utilitarian bridge will enhance views along Duke Street Hill towards the Grade 1 listed Southwark Cathedral, and will enhance the setting of the Duke Street Hill and Borough High Street conservation areas as well as the townscape of Duke Street Hill. This will provide a further public benefit to the scheme. The success of the development will rely to a large degree on the success and sustainability of this landscape. A condition and obligation is recommended to ensure that its detailed design and mature character of the landscape is delivered and maintained in the longer term. Accordingly it is considered that this landscape could provide the required functional public space appropriate to the height and size of the proposed building.

*Provide a new publicly accessible space at or near to the top of the building*

100. The proposal includes a restaurant at Level 11 which is accessible to the public. This is prominently located at the bridgehead with an open terrace in the framed feature at the top of the first tier. This will not only offer unique views of the River Thames but good views of Southwark Cathedral and even St Paul's to the west.

Architectural design and materials

101. Southwark Plan Policy P14 sets out the criteria for securing high quality design. In respect of architectural design and materials the policy requires all developments to demonstrate high standards of design including building fabric, function and composition; presenting design solutions that are specific to the site's historic context, topography and constraints; responding positively to the

context using durable, quality materials which are constructed and designed sustainably to adapt to the impacts of climate change.

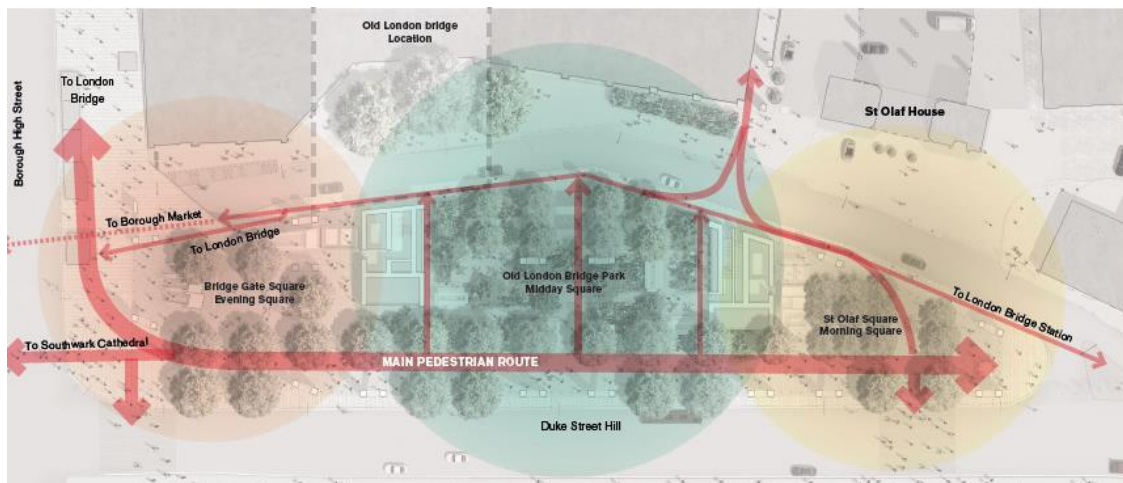
102. The proposed building would comprise four distinct stepped elements that would step down westwards. The facades exhibit a clear order, rhythm, texture and depth. The detailed elevational architecture of the building complements its massing strategy which successfully breaks up the mass and slenderises the proportions of the building particular in east and west views.
103. The architects have taken elements of the surrounding townscape to inform the architectural design and choice of materials for this development. The material palette has been informed by the recurring colours and textures found in the local context. The indicative material for the solid parts of the façade is brushed anodised aluminium in light bronze for the frame and the external louvres. Precast white polished concrete is proposed for the exposed columns and tapered floor slabs. The canopies to the south have integrated photovoltaic panels at optimal angles for energy generation and are located in a way so as to not be visible either from street level or the interior of the building. The windows are deeply recessed within the expressed triple stack frame attribute to the façade an inherently three dimensional appearance and allows the play of shadows to add modelling and articulation to the façade. The windows are clear double and triple glazing panels.
104. The proposed material for the exposed columns and beams at ground plane is white polished concrete. The choice of material for the extensive ceiling below the building is based on the intention to maximise the perceived brightness of the space. In order to maximise light levels, the finishing for the extensive ceiling is profiled white back-painted glass. This type of finish will reflect and bounce the light towards the ground. The material itself appears bright, reducing the contrast between the sky and the ceiling.
105. Overall, the elevational architecture is considered to be of the highest standards and would be successful in expressing the building's component parts well and giving the building a clear and coherent identity. The materials proposed are considered to be appropriate and high quality and would be secured by condition.

### Landscaping, trees and urban greening

106. London Plan Policy G7 and Southwark Plan Policy P61 recognise the importance of retaining and planting new trees wherever possible within new developments, Policy G5 requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. The policy identifies a scoring system for measuring urban greening on a particular site (Urban Greening Factor) and suggests a target score of 0.3 for predominately commercial development.
107. With regards to trees, London Plan Policy G7 states that development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees, there

should be adequate replacement based on the existing value of the benefits of the trees removed. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

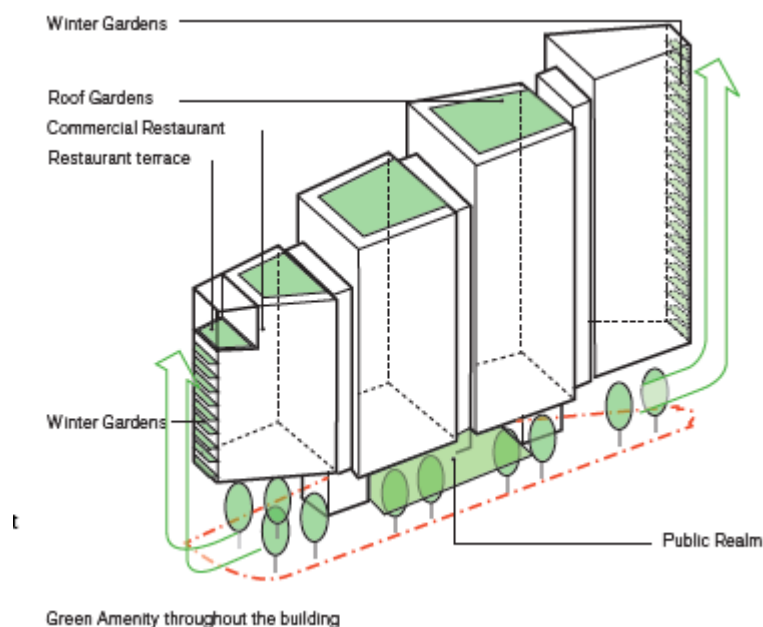
108. At the present time the site comprises mainly buildings, walkways and hard landscaping with a limited number of street trees on Duke Street Hill. Therefore the opportunity exists for significant improvements to be made in terms of soft landscaping proposals and contribution towards urban greening. At present there are a total of nine trees on site seven are Category C and two are Category B. These trees are located on street within the site boundary and it is proposed that all nine trees be removed in order to enable development to take place and to undertake a long term planting strategy for the site that would see trees appropriately located in order to maximise their impact on public amenity.
109. As part of the re-development plans, a total of 38 new trees would be planted on site and these would be a mixture of single and multi-stem species. This would be a significant improvement on the current situation and would result in higher value trees with greater canopy cover than at present. The 38 new trees would also contribute to the 981.98% biodiversity net gain that would be achieved in the site and is supported by the council's ecologist.
110. Landscaping and public realm are central to the development's design and are considered to be one of the most significant public benefits of the scheme, with the potential to transform the street level experience of this part of London Bridge. The proposed building would be elevated by up to 18.5 metres in order to accommodate a fully accessible public realm beneath the building, which would improve pedestrian connectivity, visual linkages and create a series of generous and accessible new public spaces. The public realm would comprise three character areas, each designed in response to their orientation and how they would be used.



111. Morning Square would be located to the eastern end of the site and would capture the morning sun. This area would accommodate the escalators and lift/stairs providing access to the replacement footbridge connecting to London Bridge Station. Whilst this area would be landscaped and feature tree planting, it would also accommodate public art and some seating areas reflecting a balance between hard and soft landscaping in response to its character as a

busy node at the junction of Tooley Street and Duke Street Hill.

112. Midday Square would be located centrally within the site and would be the most heavily landscaped and tree planted part of the public realm. Midday Square would also provide pedestrian linkages to Tooley Street and the entrances to the theatre and retail units. The character of Midday Square would be of a soft landscaped space with trees, green walls, seating and further opportunities for local/public art.



113. Evening Square makes up the third and final part of the public realm. Located to the west of the site and named due to its position in taking advantage of the evening sun, this part of the public realm has been designed as the front door to the development with the access points for the offices above being located centrally within this space. This is likely to be a high transit space and this is reflected in the fact that it would be a more hard landscaped space than Midday Square and Morning Square although there would still be ample room for tree planting.
114. The three ground level squares each serve a different purpose and have been designed accordingly. Whilst all three squares would feature tree planting, the central Midday Square would be the hub of the green planted spaces, drawing people in and providing access to the retail and theatre entrances on Tooley Street. Midday Square would contribute most significantly to the Urban Greening Factor for the site.
115. When originally submitted, the site was anticipated to achieve a score of 0.3 UGF and as such would have fully complied with London Plan Policy. However, due to TfL requirements for increased footpath widths to accommodate increased pedestrian flows (including landing areas for escalators, stairs and lifts serving the replacement footbridge), some of the landscaping at ground floor level had to be redesigned. This resulted in a reduction of the proposed number of trees from the original 40 to the now proposed 38. As such the Urban Greening Factor has been reduced to 0.28UGF.

116. The proposed development dramatically increases green cover across the site through green walling, street trees, and intensive planting and intensive green roofs. It is considered that this level of planting would not be possible without raising the building above ground and as such the score of 0.28UGF is considered acceptable in this instance taking into account the site specific circumstances and the requirements set out by TfL.

### Design Review Panel

117. The proposal was reviewed by the Design Review Panel in September 2020 at pre-application stage. The panel criticised the loss of the pedestrian bridge and the visual impact of the proposal especially from the north and east and they questioned the quality of the landscape and the prominence of the Southwark Playhouse.
118. Overall the panel welcomed the involvement of a high profile architect on this proposal. They noted the ambition to create a highly sustainable building in this location and concluded that this is a key piece of urban infrastructure at this important river crossing.
119. In response to these issues the bridge would now be reinstated as part of this development. Further, the TVIA includes the views considered by the panel and especially the view from the east along Tooley Street where the building is it its tallest. In this respect the elevated building and prow-like design presents a narrow vertical profile from this side that will accentuate its verticality without causing harm to the established setting.

### Designing out crime

120. Policy D3 of the London Plan 2021 states that measures to design out crime should be integral to development proposals and be considered early in the design process. Developments should ensure good natural surveillance, clear sight lines, appropriate lighting, logical and well-used routes and a lack of potential hiding places. Policy P16 of the Southwark Plan 2022 reinforces this and states that development must provide clear and uniform signage that helps people move around and effective street lighting to illuminate the public realm. These issues are important consideration and the development would be required to achieve Secure By Design Accreditation. This would be a conditioned requirement of any consent issued, as recommended by the Metropolitan Police.

### Fire safety

121. A Fire Safety Strategy (updated in June 2021) has been submitted to demonstrate compliance with the requirements of London Plan Policy D12. This policy requires developments to achieve the highest standards of fire safety and ensure that they identify suitably positioned unobstructed outside space for appliances, incorporate features to reduce risk to life and injury in the event of a fire; designed and constructed in order to minimise the spread of a fire; and provide suitable and convenient means of escape for all building users.
122. The policy requires that the Fire Strategy statement should include information

in terms of the building's construction, means of escape for all users, fire suppression features and measures that would reduce risk to life and injury. The strategy should also include details of how access would be provided for fire service personnel and equipment as well as provision for appliances to gain access to the building.

123. The submitted Fire Statement has been prepared in accordance with Policy D12 of the London Plan. The Fire Strategy sets out that the building would be served by an automatic suppression system in the form of sprinklers with a fire detection and alarm system. The strategy also provides information on emergency power supplies, means of escape, basis of design, means of construction and the competency of the strategy authors. The development would include dedicated fire fighter stairs and lifts as well as combined passenger/evacuation lifts.

### **Heritage considerations**

124. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to consider the impacts of a development on a listed building or its setting and to pay special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Further, Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers determining planning applications for development within Conservation Areas to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.
125. Chapter 16 of the NPPF contains national policy on the conservation of the historic environment. It explains that great weight should be given to the conservation of heritage assets. The more important the asset, the greater the weight should be (paragraph 199). Any harm to, or loss of significance of a designated heritage asset should require clear and convincing justification (paragraph 200). Pursuant to paragraph 201, where a proposed development would lead to substantial harm or total loss of significance of a designated heritage asset, permission should be refused unless certain specified criteria are met. Paragraph 202 explains that where a development would give rise to less than substantial harm to a designated heritage asset, the harm should be weighed against the public benefits of the scheme. Paragraph 203 deals with non-designated heritage assets and explains that the effect of development on such assets should be taking into account, and a balanced judgment should be formed having regard to the scale of any harm or loss and the significance of the asset. Working through the relevant paragraphs of the NPPF will ensure that a decision-maker has complied with its statutory duty in relation to Conservation Areas and Listed Buildings.
126. Development plan policies (London Plan Policy HC1 and Southwark Plan Policies P19, P20 and P21) echo the requirements of the NPPF in respect of heritage assets and require all development to conserve or enhance the significance and the settings of all heritage assets and avoid causing harm.

### **The Tooley Street Conservation Area**

127. The property is not listed but part of the site is included in the Tooley Street



conservation area. The eastern-most corner of the site is within the Conservation Area boundary which skirts the existing reinforced concrete building, and includes the historic buildings of the River frontage to the north and extends a short distance to the west along Duke Street Hill. Given that part of the site is within the conservation area it is necessary to assess impacts on the Tooley Street Conservation area as required by s72 (as well as its impact on neighbouring conservation areas).

128. The existing building is a mid-rise concrete-framed building in the brutalist style designed around an elevated walkway which connects London Bridge Station to the London Bridge crossing. The building is an interesting example of this typology but is not listable and is not of sufficient architectural interest or significance to warrant its preservation. The building itself is not in a conservation area. Its demolition can be justified and considered in the planning balance overall.
129. The adopted Conservation Area Appraisal (2003) defines the significance of the Hays Wharf Sub-Area (Sub-Area 1) primarily in the views “from north bank where it presents a solid block of development from London Bridge to the Crown Court at Battle Bridge Lane.” To the south and within the blocks the appraisal goes on to highlight a “*range of intimate spaces, from the bustle and café character of Hay’s Galleria, to the quite precious and private drive-through to the entrance of St Olaf House.*” This duality of character is noted in the appraisal and in the hierarchy of significance the river presence is rightly prescient.
130. The eastern-most edge of the site is currently a widened pavement. It does not include any historic built fabric and its inclusion in the conservation area outline is not due to a particular historic feature. In essence its inclusion appears to be that the open space in this location contributes to the appreciation of the significance of the Conservation Area, primarily because it offers unobstructed views of a number of listed buildings including the Grade II\* listed St Olaf House and its drive-through entrance when viewed from Duke Street Hill and thus contributes positively to its setting.
131. The proposal responds to this intimate setting and the entire building is raised on stilts to a height of approximately 15m in this location. The effect of elevating the new building in this way will be that a new soffit is created on the site approximately at the parapet height of the historic townscape offering largely uninterrupted views, and in some cases framing, the local views of these buildings.
132. The building is at its tallest on the eastern edge of the site and as such is likely to have the greatest material impact on this small part of the conservation area on which it sits. However, the substantial elevation of the building especially in this location, its careful consideration of views of the historic townscape from Tooley Street and Duke Street Hill will not only conserve the open setting of these buildings but would also, when one considers the enhancements to the public realm, offer a considerable enhancement to the presence of the conservation area from the south.
133. The river view of the conservation area and the presence of Sub-Area 1 in particular is largely unaffected by the proposal. Views of St Olaf House and its

relationship to the area are unaffected – with the stepped profile of the tall building layered behind the primary river frontage and merging with other tall buildings around the base of the Shard which retains its primacy as the centre of the cluster.

134. In conclusion, it is considered the effect of the proposal on the conservation area, due to its substantial elevation above the ground plane and localised emphasis on the visibility of preserved historic townscape, the opening up of previously restricted views of buildings and especially of the southern façade and distinctive drive-through entrance of the grade 2\* St Olaf House, the proposal is only likely to cause limited harm to the character and appearance of the conservation area. Whilst the presence of a tall building in this location cannot go unnoticed, its elevation on columns above the ground plane, its emphasis on the public realm and its sensitive response to features of significance to the historic townscape, ensures that the limited harm caused is at the lowest order of Less than Substantial as defined by paragraph 199 of the NPPF (2021).
135. The NPPF requires that harm should be avoided and, where identified clear and convincing justification for that harm should be required. In this case, part of the justification includes the minimal impact on the physical space within the conservation area, the fact that no built fabric of significance is affected and the way that the design deliberately sets out to minimise any impact on the setting of the conservation area, and in fact reveals and frames adjacent listed buildings leading to less than substantial harm being caused as set out in the above paragraphs. . The NPPF goes on in paragraph 201 to state that, where less than substantial harm is considered the only justification that can be considered in the balance are any substantial public benefits arising due to the development. In this case the devotion of most of the site to a publicly accessible landscape, the provision of a public footbridge to the station that enhances the setting of both the Borough High Street and Tooley Street conservation areas and the setting of the grade 1 listed Southwark Cathedral and the inclusion of a new theatre as part of the development, together with the conservation benefits of opening up views of the historic townscape are considered to outweigh the limited harm to the character and appearance of the conservation area and meets the test set out in guidance policy.

#### Listed buildings

136. The property sits between two conservation areas, the Tooley Street CA to the east and the Borough High Street CA to the west. As well as those closest to the site listed in paragraph 32, the wider area includes a number of other listed buildings, and a more comprehensive list is set out below:
137. The Grade I Listed:
- Southwark Cathedral; and
  - The George Inn;
- The Grade II\* Listed:
- St Olaf House;
  - 9A St Thomas Street;
  - Nos 9, 11 and 13 St Thomas Street; and
  - Guys Hospital main buildings including Wings and Chapel;
- The Grade II Listed in the immediate area:
- Southern archway of London Bridge;

- Hibernia Chambers;
- Bridge House;
- 6, 8 and 10 Borough High Street;
- Joiner Street Bridge;
- London Bridge Hospital; and
- 29,31 and 33 Tooley Street

138. The proposal, due to its substantial scale, will alter the settings of the immediate Listed buildings. In an urban setting such as this where modern buildings are often located immediately adjacent to heritage assets it is not unusual to consider such change but in doing so it is necessary to consider the significance of each asset, the contribution of their setting to that significance and to understand where harm may arise to their significance as a consequence of the development. In this context, the devotion of the ground plane to a public space coupled with the elevation of the building by around 11 to 15m will help to establish a new setting for the affected heritage assets opening up views that are currently unavailable and the replacement of the existing utilitarian footbridge with a lighter structure better reveals parts of the heritage townscape. How this impacts individual heritage assets is set out in the following paragraphs.
139. The application is accompanied by a TVIA which provides detailed and zoomed views of LVMF defined views, Important Borough Views and wider townscape views. In these instances views are considered both in their own right to chart the townscape impact of the proposed design and separately to recognise any harm caused. In this respect five key areas have been the focus of attention:

#### The Tower of London

##### 1. The Tower of London World Heritage Site.

140. The proposal is likely to appear as an incidental feature from the wider Tower environs, set behind the More London development and the River frontage buildings and within the Shard Cluster, similar in height to the recently completed Fielden House and London Bridge Place buildings.
141. The TVIA demonstrates that the building would not be visible from the views of highest significance identified in the Tower of London Setting Study, the Inner Ward views around the Tower itself and the views from Royal Mint Court. In this respect it is considered that the proposal does not give rise to harm to the Outstanding Universal Value of the Tower of London World Heritage Site.

#### St Paul's Cathedral

##### 2. The LVMF Views 2A.1 from Parliament Hill and 3A.1 from Kenwood House.

142. In the LVMF view from Parliament Hill the proposal is located immediately to the left of the dome of St Paul's. The proposal will appear in the Wider Setting Consultation area, in the backdrop to the Strategic Landmark of St Paul's Cathedral. The LVMF notes that in the backdrop to St Paul's is the London Bridge cluster currently visible in in this view. It goes on to state that: "*the Shard with its distinctive shape and high quality materials provides a strong orientation point to allow the viewer to recognise St Paul within the wider panorama.*"



143. The building's stepped form responds deliberately to this specific view with the first step aligning with the top of the peristyle. Beyond that and from the second step the building is angled away from the dome. The zoomed-in view demonstrates that the stepped profile does not interact with the dome above the peristyle and it will remain below the distant horizon.
144. It is considered that there is some limited harm arising to this LVMF View (2A.1) due to the close interaction between the silhouette of the building and the dome and peristyle. Notwithstanding this, the harm is considered to be of the lowest order of less than substantial harm, only apparent in the highly zoomed in view and not detracting from the viewer's ability to recognise and appreciate St Paul's Cathedral. The GLA has not raised a concern about this impact of the proposal in this London Panorama and whilst Historic England have not raised a formal objection in this regard, they have expressed concerns that the development would cause some harm to this protected view. In conclusion the less than substantial harm arising could be considered in the balance against the public benefits arising from this proposal.
145. In the view from Kenwood House the proposal will appear a short distance to the left of the dome of St Paul's Cathedral. Here too the proposal will be at the edge of the backdrop Wider Setting Consultation area of St Paul's. The zoomed-in view once again demonstrates that the proposal is lowest closest to the dome and rising away from it and stays well below the distant horizon. The GLA have not raised any concerns about this view. It is not considered that the development gives rise to any harm to this protected view.



146. In conclusion, the proposal does not give rise to harm in this LVMF View (3A.1) and will not affect the viewer's ability to recognise and appreciate the Strategic Landmark of St Paul's Cathedral

### Southwark Cathedral

#### 3. Views of Southwark Cathedral

147. Whilst the wider London views are significant, the local views of and around Southwark Cathedral have been a key consideration. In this respect one of the main areas of concern has been the approach to the Cathedral along Winchester Walk from the west. The Cathedral itself is Grade I Listed and is the centre-piece of this part of the Borough High Street Conservation Area.
148. In early design iterations, the proposed building potentially clashed with the cathedral spire in views along Winchester Walk. During the course of the pre-application discussions the design was amended with a reduction in height from 128m to 104m in height. At this reduced height, the TVIA now demonstrates that the tower would be partially visible from the western-most end of Winchester Walk to around its mid-way point on the southern (Borough Market Car Park) side of the street. Whilst only visible from these limited viewpoints it has to be borne in mind that the street is usually very busy and so this is a view that will be experienced by relatively large numbers of people. Nonetheless the revisions to the development are considered to have significantly reduced the impact of the scheme on the listed cathedral building as set out below.
149. In assessing this view officers considered in particular that this is an experience from within the conservation area and one of the main approaches to the cathedral terminated by a clear view of the cathedral spire. This approach and view contributes positively to the significance of the cathedral and the conservation area and their settings. The TVIA demonstrates that visibility of the tower, which would appear behind the Cathedral, to the left hand side of the tower, and whilst it fills a space currently open to the sky it does not intrude into

the crown of the cathedral spire. The greatest visibility is at the western end of Winchester Walk and by around mid-point the proposed building disappears from view. As a consequence, bearing in mind the significance of the cathedral (being Grade I Listed) and the degree of visibility, it is considered that there is some harm arising and that this harm is of the lowest order of less than substantial.



150. In these cases decision-makers have to consider whether the limited harm arising to the setting of the cathedral and the conservation area due to the degree of visibility from Winchester Walk, can be justified convincingly. The harm is considered to be at the lowest order of less than substantial when we consider the extent of the impact i.e. that the scheme fills in a currently open sky space to the left of the tower when viewed from Winchester Walk and then the scheme disappears from view behind the cathedral as one gets closer to the cathedral and its environs.
151. Any harm to a designated heritage asset must be given considerable weight, and balanced against the public benefits arising in accordance with the NPPF and thus the statutory duties which are engaged. In carrying out that balancing exercise, it is relevant to note that the harm is partly driven by one of the substantial public benefits of the development which is the ground floor public landscape, which could only be delivered successfully by the raising the building on stilts above the ground plane. Raising the building in this way has resulted in some visibility of the scheme in conjunction with the cathedral from Winchester Walk.
152. Further, it is considered that the delivery of a high quality landscaped public space in the Colechurch House site will deliver wider benefits, not only to those accessing the site but also the substantial numbers of commuters using London Bridge Station every day.
153. In conclusion, it is considered that the lowest order of less than substantial harm

to the setting of Southwark Cathedral and the Borough High Street Conservation Area due to the visibility from Winchester Walk is outweighed convincingly by the substantial public benefits arising from the development including the ground floor public landscape, the affordable workspace (including the re-provided Southwark Playhouse) and the exemplary quality of the design.

The setting of listed buildings (in order of proximity)

154. *St Olaf House*

St Olaf House is Grade II\* listed and as such is one of the borough's most significant listed buildings. Its primary façade is onto the River where it forms part of the block of development forming a continuous and highly significant frontage visible from the north bank. The development will have a limited effect on the views of St Olaf House from the north and will appear in the backdrop as a highly articulated mass and stepped glazed façade. Due to its articulated massing and stepped profile, rising from the lowest point at the west to the highest point in the east, the design compliments the group of buildings around the Shard, appears in the secondary layer of visibility to the rear of St Olaf House and does not detract from its river setting.

155. To the rear onto Tooley Street St Olaf House has a distinguished frontage, drive-through portico and a public underpass offering access to the River Walk. This allows the viewer to enjoy and appreciate its authentic Art Deco design and its features of significance close-up. By lifting the entire building up on stilts and turning most of the site into a publicly accessible landscape the development has opened up routes and views of the southern facade St Olaf House – previously largely hidden behind the current Colechurch House. The design has specifically responded to this challenge with the degree of elevation above the ground plane calibrated to optimise visibility of this listed building and open up new views and routes to and from the River. In this respect the harm arising as a consequence of the substantial building being located so close to this important Listed Building is counter balanced to a degree by the enhancement to the setting of the listed building created by the redevelopment and the residual harm is considered to be limited and of a lesser order of Less than Substantial harm.

156. In conclusion, it is considered that the lowest order of less than substantial harm to the setting of St Olaf House due to the scale and massing of the development is outweighed convincingly by the substantial public benefits arising from the development including the enhancement to the setting of St Olaf House, ground floor public landscape, the affordable workspace (including the re-provided Southwark Playhouse) and the exemplary quality of the design.

157. *London Bridge Hospital*

London Bridge Hospital comprises a group of buildings and includes Nos 15, 17-25 and 29-33 Tooley Street. The significance of the London Bridge Hospital is two-fold, firstly in respect of its River presence (where it forms part of that cohesive group of buildings together with St Olaf House and the Hays Galleria) and secondly in respect of its street frontage on Tooley Street.

158. The development will have a limited effect on the views of London Bridge Hospital from the north and will appear in the backdrop as a highly articulated mass and stepped glazed façade. Due to its articulated massing and stepped

profile it is considered that the design compliments the group of buildings around the Shard, will appear in the backdrop and to the side of London Bridge Hospital and does not detract from its river setting.

159. When viewed from Tooley Street the Grade II Listed London Bridge Hospital forms a rich and cohesive historic townscape. It is a group that defines this part of the conservation area and mainly appreciated from the south along Tooley Street. By lifting the entire building up the development has opened up views of the London Bridge Hospital and with the soffit of the new building elevated to the parapet height of the hospital buildings, it reinforces the cohesive historic character of this group of listed buildings. In this respect the harm arising as a consequence of the substantial building located so close to this important Listed Building is considered to be limited and of a lesser order of Less than Substantial harm.
160. In conclusion, it is considered that the lowest order of less than substantial harm to the setting of London Bridge Hospital, due to the scale and massing of the development elevated above the view-line is outweighed convincingly by the substantial public benefits arising from the development including the ground floor public landscape, the affordable workspace (including the re-provided Southwark Playhouse) and the exemplary quality of the design.
161. *Southern archway of London Bridge*  
The significance of this listed structure is largely contained within the structure of the modern bridge with fragments visible on the east-west approach along Tooley Street/Montague Close. The development will have no impact on the setting of this heritage asset invisible in the easterly approach (where it would be located behind the viewer) and largely shielded from view by Bridge House in the approach along Montague Close.
162. *Joiner Street Bridge*  
The significance of this listed structure is largely contained within the structure of the modern London Bridge Station and visible mainly and recessed in the pedestrian entrance/exit to the Station. The development will have no impact on the setting of this heritage asset invisible in the northerly approach from Tooley Street and shielded from view by the station superstructure as one exits.
163. *Hibernia Chambers, Bridge House and 6, 8 and 10 Borough High Street*  
The significance of this group of buildings is in their relationship with London Bridge and the Cathedral to the rear. On the Bridge they are a cohesive group of historic buildings forming a largely unbroken historic frontage on the western edge of the bridge approach. They are a striking group of buildings for historic guilds and cooperatives currently repurposed as commercial offices with some retail. Their primary facades and highest significance are onto the Bridge but to the rear they form the built edge of Southwark Cathedral environs.
164. The development is to the east of these buildings and outside the conservation area and when considered in the context of the four lanes of highway of the Bridge and the largely modern townscape of the eastern edge of the Bridge the impact on the setting of these heritage assets is considered to be limited. Further, and by starting low at the bridgehead and rising away from these buildings to the east the development is considered to have a limited impact if



any on the setting of these heritage assets.

165. *The St Thomas Street group*

To the south of the Station is a number of Listed Buildings mainly located within Sub Area 4 of the Borough High Street. These include the Grade I Listed George Inn and the Grade II\* Listed 9A St Thomas Street, Nos 9, 11 and 13 St Thomas Street; and Guys Hospital main buildings including Wings and Chapel.

166. The development is hidden from view by the recently completed News Building and as such will not impact on the settings of these highly significant Listed Buildings

167. In conclusion and when the significance of the listed buildings identified above are considered together with the contribution of their settings any harm arising due to the development is limited and where it is noted has been considered to be at the lower end of Less than Substantial. In this case, any harm to the listed buildings and their settings is comprehensively outweighed by the substantial public benefits arising due to the development including the improvement to the setting of some of the listed buildings, ground floor public landscape, the affordable workspace (including the re-provided Southwark Playhouse) and the exemplary quality of the design.

4. The river view from London Bridge

168. From this location, the development is seen in the context of the London Bridge cluster, the River frontage and Southwark Cathedral. As a primary approach from the north and one that encompasses heritage assets of the highest significance, this view encapsulates the contrasts of the modern city – the scale and design of the modern development sitting alongside the historic setting and fine grain of the historic city, but with the new interventions standing clearly separate from the key historic features.



169. In this view the stepped profile and articulated form of the design is apparent. The building introduces height closer to the River edge but does so in a measured way – set behind the warehouses forming the River edge. Beyond that, its stepped profile and vertical articulation appears to respond to the lower scale and finer grain of the Borough High Street Conservation Area and Cathedral to the right of the bridge whilst rising to the left to reflect the modern scale of the Shard, which continues to remain significantly taller than and the towers that surround it, including this proposal.
170. In this context the proposal is considered to complement the established townscape and form of the London Bridge cluster as it reduces in height towards Southwark Cathedral. There is no additional harm arising to any heritage assets as a consequence and the proposal is considered to comply with policy in this view.

#### 5. The Borough High Street View

171. This view is located at the busy junction of Borough High Street and Southwark Street in the southern approach to London Bridge. Here the viewer is located within the Borough High Street Conservation Area and where a number of listed buildings are visible in the foreground. In the background and also visible in the view are the Shard and a number of the glass-clad towers clustered around it, with the Shard maintaining its primacy in the view.
172. The proposal appears to mediate between the glass-clad buildings in the backdrop, and the more distant form of 1 London Bridge in this view. The lower tier is most prominent with the second and part of the third tier also visible in the gap between London Bridge Place and 1 London Bridge. Its stepped form together with the open framed design of the lowest tier appear to respond to the urban setting and it does not appear discordant in this view. Further, its slender vertical blocks and its masonry materiality and adds a new and dynamic materiality to the cluster.



173. Accordingly, it is considered that there is no harm arising to the character and appearance of the conservation area and its setting in this view. The stepped form of the building appears to lead the eye of the viewer towards the location of London Bridge and its design contributes positively to the amenity of the area. In this way the building forms part of a highly articulate backdrop highlighting the bridgehead beyond and creating a focus to the view that is centred on the River crossing.
174. In conclusion, the development is an elegant and highly articulated design that is exemplary in many respects. The stated ambition to establish a highly sustainable development together with a ground plane devoted to publicly accessible landscape is unique and potentially ground-breaking. Added to that, the provision of a high quality and well established theatre as well as an important piece of commuter infrastructure – the bridge – will ensure that the development will deliver exemplary design in this location.
175. In assessing the proposal Officers have recognised some less than substantial harm (as defined by paragraph 199 of the NPPF) arising to heritage assets due to this proposal. Of the harms identified all have been at the lowest end of the spectrum. In particular the impact of the proposal on views of Southwark Cathedral and the Borough High Street Conservation Area from Winchester Walk as well as the LVMF View 2A.1 from Parliament Hill is highlighted in the assessment above
176. The NPPF goes on to state that any harm to heritage assets should be avoided and requires compelling justification before it can be considered in the balance. Paragraph 202 goes on to state that: *Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.*

177. In this case the substantial public benefits arising including the ground-based public landscape, the re-provided Southwark Playhouse Theatre and affordable workspace, the re-provided and improved pedestrian bridge as well as the exemplary quality of design are considered substantial public benefits that provide compelling justification for the limited harm identified. These public benefits are in addition to the redevelopment of an under-utilised site, the delivery of high quality office building and a new rooftop restaurant.

## Archaeology

178. Archaeology has been considered in full in Chapter 12 of the ES. Baseline data has been collated within a 250m study area, agreed by the Southwark Archaeology Officer. A suitable range of sources are stated to have been consulted. The ES has considered the potential effects resulting from the demolition and construction of the proposed development on the following potentially sensitive assets (receptors):
- Prehistoric remains;
  - Roman remains;
  - Later medieval building foundation remains and cut features;
  - Post-medieval building remains, including basements and cellars; and
  - Remains of John Rennie's 1831 London Bridge.
179. The site occupies a highly significant location within Southwark within a Tier 1 Archaeological Priority Area. The line of medieval and post medieval Borough High Street will run through the footprint of this building. It is most likely the Roman alignment of Borough High Street also runs through the footprint of Colechurch House. The boundary of Bermondsey St Olave's historic parish is also within the footprint of the building. This site has the potential to contain archaeological evidence from both sides of the historic alignment of Borough High Street from the roman, post roman, medieval and post-medieval periods. The site includes buildings likely to occupy the west side of this road.
180. Much of the footprint of Colechurch House has previously been excavated, and has received limited publication despite the significance of the remains excavated. The site also contains remains of the grade II listed John Rennie, 1831 London Bridge. These have been examined in archaeological work for the base of the Southwark Needle, now located within the pavement of London Bridge, at the junction with Duke Street Hill. The remains excavated appear to consist of granite corbel tables, indicating the façade of the bridge might continue to the south.
181. The remains of Rennie's 1832 London Bridge are known to survive within the site boundary. Archaeological monitoring by the PCA recovered two parts of a probably corbel table, that are now displayed on Duke Street Hill, in construction works for the Southwark Needle. The east wall of this grade II listed building is within the red line boundary of the site, and appears to be within the construction area. Archaeological evaluation should enable a clearer definition to be made of the character and significance of surviving remains.
182. The applicants note the agreed WSI for an archaeological evaluation in paragraph 12.46 of the ES chapter. The works for this WSI have been partially

carried out; one trench was excavated within the existing basement of Colechurch House, the second trench, to the south wall was not possible due to the needs of essential retail within the building to use the space.

183. The excavated trench revealed another historic basement that was not shown on Goad's insurance mapping. However, it was apparent from this trench that the sands and gravels below Colechurch House, within this historic property boundary survived to a level paralleled at Fennings Wharf, therefore there is the potential for prehistoric archaeology, in the form of burials and cut features to be present where sand and gravels from the eyot surface survive. Above these natural deposits was a depth of archaeological material.
184. Within the footprint of the proposed basement level there is therefore the potential for archaeology from the prehistoric, roman, medieval and post-medieval periods to be present. These remains have been impacted by previous development of the site, and earlier archaeological works. Due to the scale of foundations of modern Colechurch House, its predecessor buildings and previous archaeological excavations, survival of archaeological material is likely to be varied across the site.
185. Following the results of the evaluation, further archaeological mitigation works should be undertaken to ensure the suitable management of the archaeological resource on site. Early consideration should be made to ensure the provision of access to the evaluation and subsequent mitigation works and to timetable in the needs of access into the construction programme of the building.
186. The presence of fabric from grade II listed John Rennie's London Bridge and Colechurch House itself are both of archaeological interest. The management of built fabric from the listed bridge will be a key heritage concern.
187. Whilst there would be no adverse effects on archaeological heritage as a result of the completed and operational development, it is acknowledged that there would be unavoidable effects during the demolition and construction phase. Demolition and construction works including the breaking out of existing foundation/floor slab, the excavation of the basement, pile removal, insertion of new piles and lift pits, and landscaping works are likely to have an impact on potential buried archaeological assets.
188. A phased programme of archaeological mitigation comprising an initial archaeological trenched evaluation, which would help to establish the nature, extent and significance of any archaeological remains within the site is agreed as the most appropriate way to offset the significant adverse effects of the development. The proposed mitigation strategy, in addition to the scope of the assessment, has been discussed and agreed with the Council's Archaeologist.
189. The results of the evaluation would enable an informed decision in respect of an appropriate mitigation strategy for any significant archaeological assets which could comprise targeted excavation if areas of significant remains are identified. A watching brief could be carried out for remains of lesser significance. This would ensure that significant archaeological assets are not removed without record.

190. As such, the council's archaeologist has recommended conditions relating to archaeological evaluation, archaeological building recording, archaeological mitigation, archaeological foundation and basement design, archaeological reporting and a final condition setting out a public engagement programme.

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

191. The importance of protecting neighbouring amenity is set out Southwark Plan Policy P56 which states "Development should not be permitted when it causes an unacceptable loss of amenity to present or future occupiers or users". The adopted 2015 Technical Update to the Residential Design Standards SPD 2011 expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.
192. A development of the size and scale proposed will clearly have potential significant impacts on the amenities and quality of life of occupiers of properties both adjoining and in the vicinity of the site. The proposal has required an EIA in order to ascertain the likely associated environmental impacts and how these impacts can be mitigated. The accompanying Environmental Statement (ES) and addendum deals with the substantive environmental issues. An assessment then needs to be made as to whether the residual impacts, following mitigation, would amount to such significant harm as to justify the refusal of planning permission.

### Outlook and privacy

193. In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear. The closest neighbours to Colechurch House are the buildings to the north on Tooley Street, none of which are in residential use. The proposed development would maintain or exceed the minimum distances as set out in the supplementary planning document and as such it is considered that there would be no significant adverse impact in terms of overlooking or loss of outlook.

### Daylight

194. A daylight and sunlight report has been submitted as part of the Environmental Statement. The report assesses the scheme based on the Building Research Establishments (BRE) guidelines on daylight and sunlight.
195. The BRE Guidance provides a technical reference for the assessment of amenity relating to daylight, sunlight and overshadowing. The guidance within it is not mandatory and the advice within the guide should not be seen as an instrument of planning policy. The guidance notes that within dense urban environments and areas of modern high rise buildings, a higher degree of obstruction may be unavoidable to match the height and proportion of existing buildings. This site benefits from an allocation in the Southwark Plan that indicates that redevelopment of the site could include taller buildings and there are existing tall buildings in the area such as The Shard, News International building and Guys Hospital Tower which are in close proximity to the site as well as consented

schemes along St Thomas Street to the south of London Bridge Station.

196. The BRE sets out the detailed daylight tests. The first is the Vertical Sky Component test (VSC), which is the most readily adopted. This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27% which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by about 20% of their original value before the loss is noticeable. In terms of the ES, the level of impact on loss of VSC is quantified as follows;

Reduction in VSC	Level of effect
0-19.9%	Negligible
20-29.9%	Minor
30-39.9%	Moderate
40% +	Major

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

198. The ES considers the effects on the following neighbouring buildings:

- 27-23 Tooley Street (London Bridge Hospital - Main Building);
- 29-33 Tooley Street (London Bridge Hospital – Urgent Care Centre);
- Shard Place (Residential)
- 15-25 Tooley Street (Emblem House/Denmark House – London Bridge Hospital);
- 13 Tooley Street (St Olaf’s House – London Bridge Hospital);
- Southwark Cathedral
- Southwark Cathedral Annex

199. 29-33 Tooley Street, Shard Place and Southwark Cathedral and annex would all remain fully compliant with the BRE in terms of both VSC and NSL and will not be considered further in the report. The tables below outline the general results in terms of the loss of VSC and NSL that would be experienced by the remaining buildings and a more localised assessment of the affected properties is detailed below.

Table – VSC Results

Property	No. of windows tested	No. retaining at least 80% of their baseline value	No. with minor adverse impact of up to 29.9% reduction in VSC	No. with moderate adverse impact of between 30%-39.9% reduction in VSC	No. with major adverse impact of over 40% reduction in VSC
27-33 Tooley Street	75	48	1	14	12
15-25 Tooley Street	217	123	39	39	16
13 Tooley Street	127	6	3	19	99

Table NSL Results

Property	No. of rooms tested	No. retaining at least 80% of their baseline value	No. with minor adverse impact of up to 29.9% reduction in VSC	No. with moderate adverse impact of between 30%-39.9% reduction in VSC	No. with major adverse impact of over 40% reduction in VSC
27-33 Tooley Street	57	48	2	6	1
15-25 Tooley Street	31	26	3	1	1
13 Tooley Street	71	24	22	3	22

### *27-33 Tooley Street*

200. This building is in healthcare use and is the main building of London Bridge Hospital. The BRE is designed to assess daylight and sunlight impacts on residential properties and as such cannot be strictly applied to non-residential uses. However, in this instance it is considered useful in helping to gauge the level of impact on daylight and sunlight as a result of the proposed development. A total of 75 windows have been assessed for VSC and 57 rooms assessed for NSL. Whilst 48 windows would comply with the BRE in terms of VSC, 14 windows would see moderate losses of up to 39.9% and 12 windows would see losses in excess of 40% which is categorised as a major loss of VSC.
201. However, these 75 windows serve 57 rooms and all of the rooms have been assessed for NSL with 48 rooms complying with the BRE and only one room experiencing a major loss of NSL. Many of the windows that would see losses of VSC would experience these losses, in some part, due to existing obstructions such as proximity of adjacent buildings. Overall, given the high level of NSL compliance and the transient nature of the use of these rooms, the impact on this building is considered to be acceptable.

### *15-25 Tooley Street*



202. This building is in healthcare use and provides outpatient facilities for London Bridge Hospital. A total of 217 windows have been assessed for VSC and 31 rooms assessed for NSL. Whilst 123 windows would comply with the BRE in terms of VSC, 39 windows would see moderate losses of up to 39.9% and 16 windows would see losses in excess of 40% which is categorised as a major loss of VSC.
203. The 217 windows assessed all serve rooms that provide outpatient facilities and as such are transitory in their use. It should also be added that of the 38 rooms assessed for NSL, only one window would see a moderate loss of NSL and one window would see a major loss. Overall the effect on this building is considered to be minor. Given the high level of NSL compliance and the transient nature of the use of these rooms, the impact on this building is considered to be acceptable.

*13 Tooley Street*

204. This building (St Olave's House) also provides outpatient facilities as part of London Bridge Hospital. Of the 127 windows assessed for VSC, only six would comply with the BRE. There would be 19 windows experiencing moderate losses of VSC and 99 windows experiencing major losses of VSC. In terms of NSL, 71 rooms were assessed and 24 would remain compliant. The remaining rooms would see minor losses (22 rooms), moderate losses (three rooms) and major losses (22 rooms). The overall effect to this building is considered to be moderate and although the effect on amenity of these rooms from reduced daylight levels is recognised, the impact is considered acceptable given the use of the building as outpatient facilities and commercial uses.

Sunlight

205. Only the building at 13 Tooley Street has been assessed for sunlight as this is the only building that meets the orientation criteria specified by the BRE in terms of the positioning and location of rooms/windows. Whilst there would be a loss of sunlight in terms of both annual sunlight hours and winter sun, the level of loss is considered acceptable taking into account the existing sunlight levels and the non-residential nature of the building which accommodates outpatient facilities and some commercial spaces.

Overshadowing of amenity spaces

206. The ES has also considered overshadowing of amenity spaces including the Thames Path, the River Thames and Southwark Cathedral. On the 21 March it was determined that there would be no effect on Southwark Cathedral or the annex. There would be some additional shadow cast throughout the day on the Thames Path however this effect would be negligible given the existence of substantial buildings already in existence closer to the Thames Path. Additionally, there would be some shadow cast throughout the day on the River Thames, however this effect would not be significant.
207. On the 21 June it was determined that there would be no effect on the Thames Path or River Thames. Whilst there would be some additional shadow cast

throughout the day on Southwark Cathedral and the annex the effect would be negligible.

208. On the 21 December it was determined that there would be no effect on the Thames Path or Southwark Cathedral and annex. Whilst there would be some additional shadow cast throughout the day on the River Thames, the effect would be not be significant.

### Conclusion on daylight and sunlight

209. The daylight and sunlight assessment presented as part of the ES demonstrates that there would be several windows that would see noticeable losses of VSC and rooms that would see noticeable losses of NSL beyond the BRE guidelines. None of the windows or rooms that would be affected are homes and as such the standards of the BRE cannot be strictly applied. The affected windows and rooms serve patient and outpatient facilities at London Bridge Hospital. The use of these spaces is transient in nature and as such would not lead to any significant adverse impacts on users.
210. The application site has been identified in policy, including in The Southwark Plan, as being suitable for a taller building and it is anticipated that there would be a degree of impact as a result of redevelopment. Developing sites in highly urbanised environments often results in some unavoidable impacts to daylight and sunlight. Recognising the challenges associated with developing inner city sites, the numerical targets given in the BRE are expected to be treated with a degree of flexibility, having due regard for the existing and emerging context within which these sites are located. The application site is within a Central London Opportunity Area and accordingly the standards should be applied with some degree of flexibility.
211. Given the small number of windows overall that would experience significant effects and the site specific circumstances set out above including the nature of the affected rooms and windows, it is considered that the overall impact would be acceptable given the benefits of the proposed development in redeveloping a currently under-used site, the provision of a significant new public realm, offices, theatre, retail and significant employment opportunities. On balance, officers consider that, when reading the BRE guidance with the required flexibility, and in view of the positive benefits of the development proposal, the degree of harm to amenity would not justify withholding planning permission in this case.

### Solar glare

212. Solar glare has been considered as part of the ES in Chapter 11. A total of 25 road and 24 rail locations have been tested. Sixteen of the 25 road locations are considered to either have no effect or negligible effects. At the remaining nine locations it is considered that minor adverse effects could occur and these are not considered to be significant. This is because solar reflections occur within 30° to 10° or between 10° to 5° of the driver's line of sight for a short period of time. A number of these locations include viewpoints which are not affected by solar reflections from the proposed development or with reflections which occur

above the 5° visor cut-off line, which the driver may deploy should this become necessary.

213. In terms of the rail viewpoints, the reflective elements of the scheme would be visible from within 30° of the driver's line of sight on approach to London Bridge Station on seven tracks. All 24 viewpoints considered would experience minor adverse effects which would not be considered significant. This is because the train would be travelling at a reduced speed as it approaches London Bridge Station and the majority of solar reflections occur above the 5° cut off line so the driver would be able to deploy the visor should this become necessary.

## **Transport and highways**

214. Chapter 9 of the NPPF seeks to ensure that transport issues are properly addressed as part of development proposals. Proposals must assess the impact upon existing transport networks, promote and maximise opportunities for sustainable transport modes whilst mitigating any adverse transport related environmental effects and must make a significant contribution to improving accessible movement and permeability as a key priority for place making. Paragraph 111 states "development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe".
215. This approach is reflected in Chapter 10 of the London Plan and Southwark Plan Policies P49 – P55, which require development proposals to maximise sustainable modes of transport by minimising car journeys, to deliver enhanced walking and cycling opportunities and safe, accessible routes to public transport. Developments should be car free save for disabled parking provision and mitigation will be secured where necessary to address impacts upon the road and public transport networks to serve new developments
216. This application was accompanied by a Transport Assessment and transport has been fully considered as part of the ES under chapter 7 – Traffic and Transport. The documents have been reviewed by the Council's Transport Policy and Highways Teams, and Transport for London (TfL).

## **Site context**

217. The site is bounded by Tooley Street to the north and east with Duke Street Hill forming the southern boundary and the western boundary being flanked by Borough High Street as it approaches London Bridge. Duke Street Hill (A200) and Borough High Street/London Bridge (A3) both form part of the TLRN whilst Tooley Street is a Southwark- controlled road.
218. London Bridge London Underground (LU) station is located opposite the application site and provides Jubilee and Northern line services. London Bridge National Rail Station is also located opposite the site and is served by Southern, Southeastern and Thameslink services. London Bridge Station has been substantially redeveloped and improved with significantly upgraded capacity and accessibility. There are a total of 15 bus routes available within a 150 metre radius of the application site including services from the adjacent London Bridge bus station which is operated by TfL. Consequently, the site has a Public

Transport Accessibility Level (PTAL) of 6b (the highest possible on a scale of 1-6b).

219. There is a cycle hire station located on Tooley Street adjacent to the site, with a capacity of 21 cycles. The local area is well covered by Legible London signage, including a large 'key' sign on the corner of Duke Street Hill where it meets Tooley Street. There are a range of cycle routes adjacent to or in close proximity to the site including:

- Route 4 of the National Cycle Network (NCN);
- Route 22 of the Local Cycle Network (LCN);
- Cycleway 4 (CW4) which links Bermondsey, Canada Water and Greenwich.

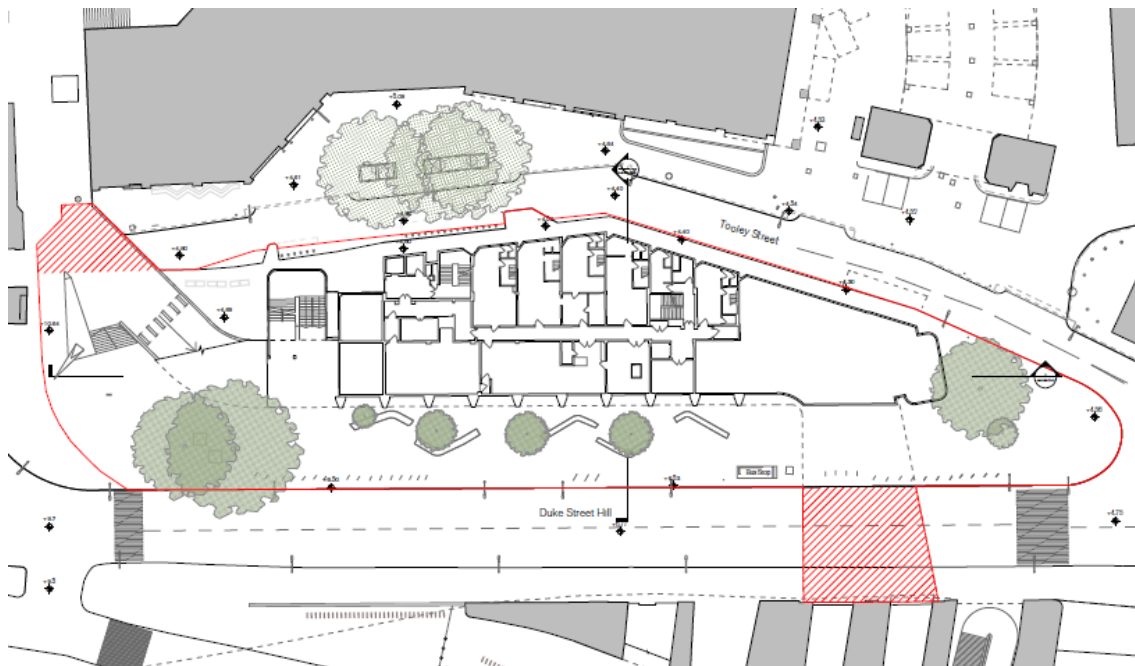
220. Riverboat services are provided from London City Pier which is located approximately 370 metres to the west and provides connections to Battersea, North Greenwich, Tower Bridge and Westminster.

## Site layout

### Existing

221. Vehicular access is currently gained from Tooley Street to the rear of the site. From London Bridge there begins an elevated walkway (London Bridge Walk) that rises along the Duke Street Hill frontage and subsequently becomes a footbridge that provides direct access to London Bridge Station. Access to Colechurch House and the majority of the retail units is taken from this elevated walkway.

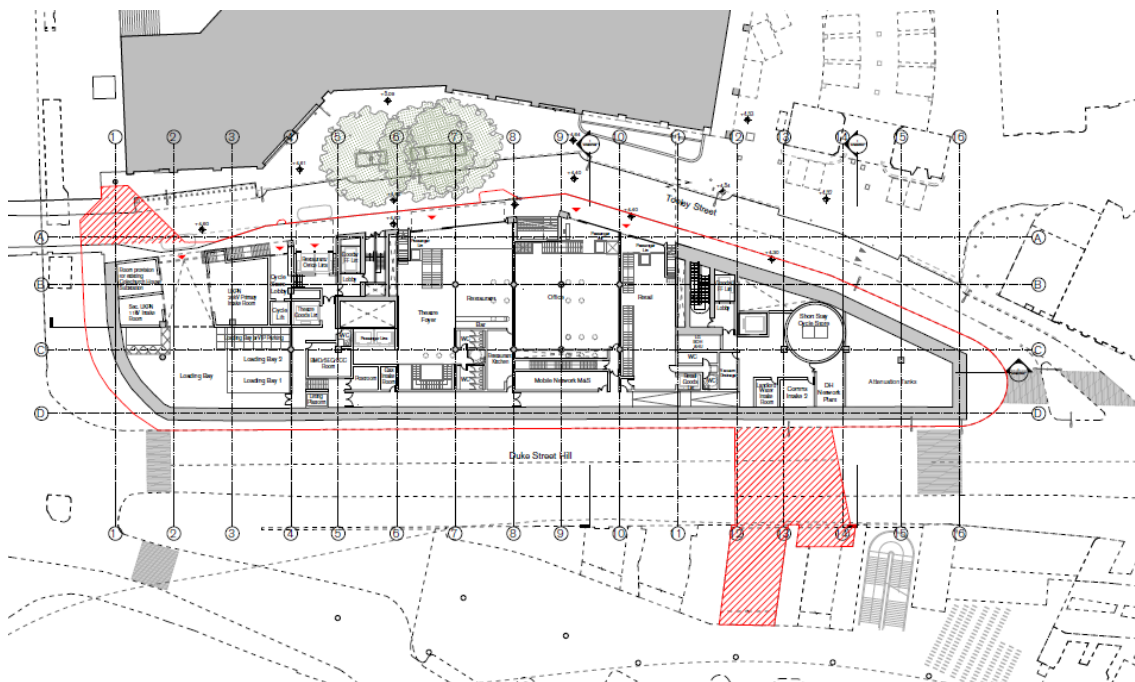
### Image – Existing arrangement



### Proposed

222. The existing Colechurch House and elevated walkway and footbridge would be demolished. The new building would be elevated well above street level, allowing a new public realm to be provided at grade with visual and pedestrian links through the site from Duke Street Hill to Tooley Street. A new replacement pedestrian footbridge linking to London Bridge Station would be provided at the eastern end of the site in the bridge's current location.
223. The development proposes to retain a single vehicular access point in the existing location on Tooley Street at the northern end of the site. This would be located at lower ground floor level, taking into account the difference in levels between Duke Street Hill and Tooley Street, and would provide access to a loading area with three servicing bays each with capacity to accommodate an 8m long box van. The loading area would also provide access to the accessible parking space.

Image – Proposed arrangement



224. Pedestrian access to the site would be achieved from a number of locations depending on what facility/use is being accessed. The retail units, theatre and affordable workspace would be accessed from Tooley Street whilst the offices and restaurants would be accessed via escalators at grade on Duke Street Hill adjacent to London Bridge. Access to the new pedestrian footbridge linking to London Bridge Station would be gained from the escalators and lifts that are proposed from the eastern end of Duke Street Hill.

### Trip generation

225. In terms of proposed vehicle movements associated with the proposed development, the Council's Transport Policy Team have reviewed the applicant's Transport Assessment as well as the travel surveys within the TRICS database. The office part of the development would be anticipated to generate 57 and 52 two way vehicle movements in the morning and evening peak periods respectively. The remaining uses (gym, restaurant, retail, theatre) would be

expected to generate 16 and 11 two way vehicle movements in the morning and evening peaks respectively. Overall, this development would be expected to produce 73 and 63 two-way vehicle movements in the morning and evening peak hours. Although these figures are higher than the vehicle movements predicted by the applicant's consultant, the Council's transport officer considers that this level of net supplementary vehicular traffic would not have any noticeable adverse impact on the prevailing vehicle movements on the adjoining roads.

226. As far as public transport is concerned, the development is anticipated to generate an additional 963 and 1047 two way public transport trips in the morning and evening peaks respectively across underground, train and bus services. Given the high public transport accessibility level of the site and the various options available for public transport, this level of trip generation is not expected to have any significant adverse impact on the public transport network.
227. Additional mitigation/travel plan measures proposed include the provision of cycling shower /change facilities, travel information and appointment of a travel plan co-ordinator who would promote sustainable travel including organising and publicising sustainable travel events in addition to monitoring the travel plan. A Construction Logistics Plan, Demolition and Environmental Management Plan and Travel Plan would be secured in the S106 Agreement alongside contributions towards improved bus services.

### Servicing and deliveries

228. It is proposed that all servicing would take place from within a dedicated on-site servicing yard accessed from Tooley Street. This servicing yard would be sufficiently sized in order to accommodate the peak demands of the development without any servicing activities having to take place from the street. The servicing yard would have capacity to accommodate three eight metre long box vans and swept paths have been provided to demonstrate that all vehicles would be able to access and egress the site in a forward gear therefore minimising any highways safety impacts.
229. The development is expected to generate 116 servicing trips per day however this is expected to be reduced significantly through the use of delivery consolidation services. Off-site consolidation is proposed for the site. The primary role of delivery consolidation centres is to reorganise non-perishable goods in order to provide a more economic and environmentally friendly delivery strategy. The key functions of delivery consolidation are to:
- reduce the number of vehicles on the road network surrounding the site;
  - improve vehicle capacity utilisation;
  - undertake deliveries outside of peak hours; and,
  - mitigate against missed deliveries through scheduling.
230. The use of delivery consolidation, which would be secured in the legal agreement, is anticipated to reduce the number of servicing trips by at least 50%.

### Refuse storage arrangements

231. Refuse will be stored within a central store in the basement which is sufficiently

sized and located to accommodate all waste generated by the proposed development. The bins would be transferred to the lower ground floor servicing area directly accessed from Tooley Street for collection. These details would be secured by condition.

### Car parking

232. London Plan Policy T6 seeks to encourage car free and car limited development as much as possible and sets maximum car parking standards for different uses whilst recognising the need for an appropriate provision of disabled parking and adequate arrangements for servicing. Non-residential uses should provide a minimum of 1 disabled space. All car parking spaces must be fitted with electric vehicle charging points. Southwark Plan Policies P54 and P55 set out car parking standards for various land uses and echo the requirements of the London Plan in terms of setting maximum car parking standards and promoting car free development save for minimum disabled provision.
233. The development is proposed to be 'car free' with the exception of one accessible car parking space which must be equipped with electric vehicle charging facilities. This provision is in line with development plan policies and should be secured by conditions.

### Cycle parking and cycling facilities

234. London Plan Policy T5 sets minimum cycle parking standards for different uses. Southwark Plan Policy P53 sets out a higher requirement than the London Plan standards.
235. The development proposes a total of 815 secure cycle parking spaces within a basement store (593 spaces) and an automated cycle store (204 spaces) as well as some cycle parking in the public realm (18 spaces). It is proposed that the existing 34 Sheffield stands located within the public realm, which provide cycle parking for 68 bicycles, be relocated to the automated cycle store.
236. The 815 cycle parking spaces being proposed includes 637 long stay spaces and 178 short stay spaces. All of the basement cycle parking would be long stay whilst the automated cycle store would comprise 16 short stay spaces and an additional 44 long stay spaces. The basement level cycle parking would be accessed by two lifts which are able to accommodate the peak demands of cyclists.
237. The automated cycle store would provide an innovative and efficient approach to cycle parking and has been employed in other major world cities. The store is formed of a large cylindrical drum located within the basement levels of the building and accessed from a 'hub' unit located above ground which cyclists use to access the store. The key information and benefits of the automated store, are as follows:
- The store is available to users 24/7, with no risk to parking overnight;
  - The average retrieval time is only 13 seconds, ranging from 8 to 17 seconds – comparable to the time taken to lock a bike at a conventional stand;

- Traditional parking can appear full even if there is surplus capacity which deters usage. Users are able to clearly and swiftly determine the number of spaces available;
- For large cycle stores it can be difficult to locate cycles or remember where yours is parked. This is not an issue with an automated solution;
- The store enables users to leave possessions (including helmets) attached to the bike and therefore removes the hassle of carrying cumbersome kit with users;
- Users don't have to negotiate doors, lifts or ramps with their bikes.
- Theft of bikes is a deterrent for cycling; and,
- Servicing and maintenance is undertaken on a preventative regime with an exceptionally low incident rate based on comparable usage in other cities

238. The development generates a cycle parking requirement of 804 cycle parking spaces and by providing 815 spaces, there would be an 11 space overprovision which is welcomed.

### Pedestrian footbridge

239. When originally submitted, the development proposed the complete removal of the pedestrian footbridge linking to London Bridge Station with no replacement bridge proposed. Following significant objection from TfL and Southwark officers, the developer amended the scheme and now proposes to provide a new replacement footbridge that would safely deliver pedestrians from Duke Street Hill to London Bridge Station.

240. A new bridge is preferred over a refurbished bridge as the existing bridge is not DDA compliant due to the steep access ramps and access to the bridge is not clear for people who may not be familiar with the local area. The existing bridge therefore has significant accessibility and legibility shortcomings. It is also considered that the bridge does not contribute to a safe environment outside of peak times due to the enclosed and covered nature of the bridge, with instances of antisocial behaviour and more serious crimes such as theft and drug use having been reported.

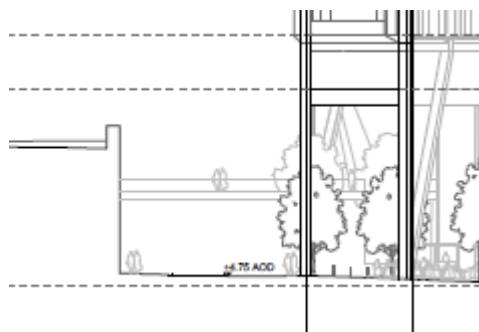
241. The proposed replacement footbridge has been sensitively designed to be incorporated into the proposed public realm in a manner which addresses the existing issues associated with the current bridge. The key attributes of the proposed footbridge are:

- A clear height of 5.03m is maintained above the Duke Street Hill carriageway beneath the bridge – a height which is no less than the existing structure.
- The bridge will measure 5m in width;
- The bridge will be open and transparent, contributing to a safer environment for users;
- The bridge will be designed to be DDA compliant and complemented by a public lift to take people between Duke Street Hill and the bridge; and,
- The bridge will be principally accessed from Duke Street Hill via two escalators and a central stair.





## Image – Replacement footbridge



242. In order to preserve access to London Bridge Station at all times and to minimise impacts on the junctions and pedestrian crossings of Duke Street Hill and Tooley Street, the applicant is proposing to provide a temporary footbridge that would be operational prior to the existing bridge being removed and would continue to be operational until such time as the new bridge is completed and available for use by the public. This would be secured in the legal agreement and would assist in minimising disruption to pedestrian movement during the demolition and construction phase.

### Pedestrian comfort

243. TfL's Pedestrian Comfort Level (PCL) Assessment Guidance provides an empirical way of determining the acceptability of suitable widths of pedestrian spaces. Whilst it is designed for footways, consideration has been given to the guidance to ensure the suitability of the width of the bridge. The PCL guidance states that a Score of 'C+' is the minimum score that TfL accept for sites at 'transport interchanges' and at locations defined as 'office and retail' which both accurately describe the location of the proposed development. The proposed bridge would meet the C+ requirement during the morning peak and an improved score of B during the evening peak and as such meets the TfL criteria. In terms of pedestrian comfort at ground level, six areas were assessed (as shown below)
244. All areas assessed met the C+ minimum requirement with two areas scoring B- and two areas scoring A-. As such it is considered that the ground level plan would comfortably be able to accommodate the predicted pedestrian flows as designed.

### Healthy streets

245. London Plan Policy T2 requires development proposals to demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance. The development provides the opportunity to greatly improve the pedestrian environment, improving the street level experience, improving pedestrian connectivity and legibility, promoting sustainable forms of transport and the use of public transport modes and the re-provision of the footbridge linking to London Bridge Station.
246. This development would be car free save for a single accessible car parking space thus promoting walking, cycling and use of public transport. Contributions have been secured for sustainable transport modes to accommodate the

demand created by future occupiers of the site. The scheme has been designed to enhance public realm on Duke Street Hill as well as improved connections to Tooley Street and the network of streets towards the riverside. The development seeks to significantly enhance biodiversity through the new landscaped public realm on Duke Street Hill and seeks to improve air quality. The scheme has been designed to minimise air and noise pollution as much as possible

### Environmental impacts

247. Environmental impacts from traffic and transport have been considered in the ES under Chapter 7. The assessment in the ES focuses on analysing the effects relating to severance (being or the feeling of being isolated or separated from something); pedestrian amenity, fear and intimidation; delay for drivers, cyclists and pedestrians; accidents and safety and public transport. The assessment firstly reviews the demolition and construction period and then looks at impacts once the development is completed and operational.
248. There would be an increase in the number of vehicles on surrounding roads during the demolition and construction phase of the development. Most of the heavy goods vehicles traffic movements associated with the construction will occur outside of the typical highway network peak periods and would be spread evenly throughout the day. The increase in the number of total construction traffic across the assessment area would be no greater than 9% and whilst there would be a greater increase in heavy duty vehicles (HDV's) on Tooley Street, it should be noted that the increase is from a very low baseline figure, particularly in the context of the wider traffic numbers on the remainder of the assessment area and the low absolute increase in vehicle numbers overall. It should also be noted that this increase in vehicle numbers would be short terms and temporary, being associated with the construction phase of the development.
249. There would be no significant adverse effects on pedestrians (in terms of severance, delay, amenity, fear & intimidation), cyclists (in terms of delay, amenity, fear & intimidation) or car drivers (in terms of delay) during demolition and construction of the proposed development. As the effects of demolition and construction traffic would not be significant, no specific mitigation measures are required. However, a Construction Logistics Plan will be prepared and implemented during demolition and construction of the proposed development, in agreement with the London Borough of Southwark, which would include measures in order to minimise the effects from demolition and construction traffic. This would be subject to consultation with London Bridge Hospital in order to minimise disruption to the operation of the facility.
250. Once completed and operational, the assessment has focused on transport considerations such as increased trips on the local highway network. The proposed development is not anticipated to generate delivery and servicing vehicle trips during morning and afternoon peak periods on the transport network owing to the proposed restrictions set out in the delivery and servicing management plan that would restrict deliveries to outside the hours of 8-9am and 5-6pm.
251. There would be no significant adverse effects on pedestrians (in terms of severance, accidents and safety), cyclists (in terms of severance, accidents and

safety) and car drivers (in terms of delay, accidents and safety) once the proposed development is completed and operational. There would be an increase in the number of trips associated with the development on public transport when compared with the baseline conditions, with an increase in the number of people travelling locally by public transport. However, these effects are not considered to be significant or detrimental. As there would be no significant adverse impacts, no specific mitigation is proposed.

252. Consideration has also been given to the potential for cumulative effects that could occur during the construction phase and as part of the completed development. In both instances the effects are considered negligible and as such not significant.
253. Climate change has been considered as part of the traffic and transport ES assessment and it is concluded that it will not have a direct effect on severance; delay; or amenity, fear and intimidation. Changing to more sustainable and active travel modes, lower emission vehicles and improved technology (which would also increase telecommuting and flexible working) could result in a reduction in peak hour traffic and the consequent reduced emissions and traffic volumes could have a benefit for cyclists and pedestrians.

## **Environmental matters**

### Flood risk

254. The application site is located within Flood Risk Zone 3A and as such a Flood Risk Assessment, Basement Impact Assessment and Drainage Strategy have been submitted as part of the application. The main source of flood risk in Southwark is as a result of tidal activity within the River Thames which lies approximately 55 metres to the north of the site. It should be noted that the site would benefit from protection by the Thames Barrier up to the 1 in 1000 year event.
255. The proposed development does not include any residential accommodation and all of the proposed uses are classified as "less vulnerable" and as such are acceptable within Flood Zone 3a. The site itself has been assessed as being at low risk of flooding from rivers or tidal sources; from surging sewers; groundwater sources; artificial sources; and surface water flooding. The Environment Agency have been consulted on the proposed development and have raised no objection subject to the imposition of conditions regarding piling; SUDS; and contamination, remediation and verification. These conditions would be attached to any consent issued.

### Sustainable urban drainage (SUDS)

256. SUDS has been considered as part of the submitted Flood Risk Assessment. The SUDS assessment reviewed various SUDS strategies for their suitability to be employed within the development. Given the site specific circumstances and limited external space associated with the development, the opportunity to incorporate significant SUDS technologies is difficult, particularly with regards to rain gardens, ponds or permeable surfaces. Instead, the development would incorporate an attenuation tank of a minimum 220 cubic metres to allow the

reduction of the peak discharge rate to 1.34 litres/sec. The proposed location of the attenuation tank is at the lower ground level, to the east of the building.

### Noise and vibration

257. The ES considers the potential for noise and vibration impacts during demolition, construction and operation of the development. This is reported within Chapter 9 of the ES. Once complete and operational, the noise and vibration assessment considered noise and vibration effects associated with operational road traffic noise on surrounding roads, operational noise from building services systems and operational noise from the proposed uses.
258. A demolition and construction environmental management plan would be required as part of any consent issued and this would include appropriate noise and vibration management and monitoring measures. The assessment identified that further mitigation measures would be required during the demolition and construction phase in order to reduce the significant effects that were still anticipated to occur. These mitigation measures include noise monitoring at sensitive locations and carrying out works in accordance with best practicable means.
259. Whilst the implementation of mitigation measures would reduce demolition and construction noise levels at sensitive receptors, it is anticipated that some significant adverse effects are likely to remain when works are undertaken nearest to the sensitive receptors. There is expected to be a temporary significant adverse effect in relation to noise at London Bridge Hospital (Olaf House and Emblem House) and overall this has been categorised as moderate adverse.
260. Whilst the remaining receptors nearby would experience some adverse effects during demolition/piling and construction, including One London Bridge (commercial), Minerva House, The Mudlark (residential), and Southwark Cathedral (place of worship), these are not anticipated to be significant. Negligible effects would be experienced at residential receptors Shard Place and the Shard which are not significant.
261. The assessment also identified the potential for significant adverse vibration effects at The Mudlark, Minerva House, Southwark Cathedral, Shard Place, The Shard, London Bridge Hospital (Olaf House and Emblem House) and One London Bridge, given their proximity to the site boundary. The assessment identifies appropriate mitigation measures such as attended monitoring of vibration at the closest receptors to assist in controlling levels at sensitive receptors and the implementation of continuous flight augered piling. With these mitigation measures in place, the effects on these receptors are likely to be temporary and adverse but are not deemed to be not significant.
262. In terms of the completed and operational development, no significant effects are anticipated from road traffic associated with the development. Conditions will be imposed on any consent issued to ensure that all plant noise would be in line with the council's limits and standards. Conditions would also be imposed to limit the hours of use of balconies and terraces. There is the potential for noise breakout from the theatre to the street however this could be controlled by employing suitable sound insulation at construction stage as well as the provision

of sound absorption within entrance corridors and through appropriate attenuation of ventilation pathways. This would minimise any potential effects and impacts and it is considered that there would be no likely significant noise or vibration effects as a result of the completed and operational development.

### Ground conditions (land contamination)

263. Ground conditions have been considered and reported in Chapter 13 of the ES and considers the effects of the demolition and construction and operational development on workers, site users, ground gas, soil and water. During the demolition and construction phase, the potentially significant adverse effects on ground conditions were considered to be:
- Potential remobilisation and creation of contaminant pathways as a result of construction activities such as piling;
  - Potential for demolition and construction workers to be exposed to landfill/ground gas;
  - Potential for building materials and construction/demolition workers to be exposed to Unexploded Ordnance (also known as 'UXO') and potential leaching/pollution from existing UXO; and
  - Potential for demolition and construction workers coming into direct contact with contaminated soils and/or contaminated groundwater and/or surface water.
264. The ES assumes that standard mitigation measures would be put in place, such as the implementation of a Demolition and Construction Environmental Management Plan; control of asbestos in line with the 2012 Asbestos Regulations; and surface water run-off from the development being discharged into the combined sewer under Tooley Street. These standard mitigation measures alongside additional mitigation measures will ensure that there would be no significant adverse effects during the demolition and construction phase. The additional mitigation measures that will be secured include the submission of a Piling Method Statement; Ground Gas Mitigation Strategy; and Foundation Works Risk Assessment. Standard conditions would ensure appropriate remediation for all expected and unexpected contamination.
265. Once the development is completed and operational, no significant adverse effects are anticipated, as a result of the implementation of the previously mentioned mitigation measures. It should be noted that the water quality of the surface water run-off will result in a minor beneficial effect on hydrology.

### Air quality

266. The application site is located within an Air Quality Management Area and the impact of the development on air quality has been assessed as part of the ES. The results of this assessment are reported in Chapter 8 of the ES. In terms of potential air quality effects, the assessment has considered:
- the impacts of the demolition and construction phase of the proposed development on dust soiling and concentrations of PM10 at existing sensitive receptors during the demolition and construction period;

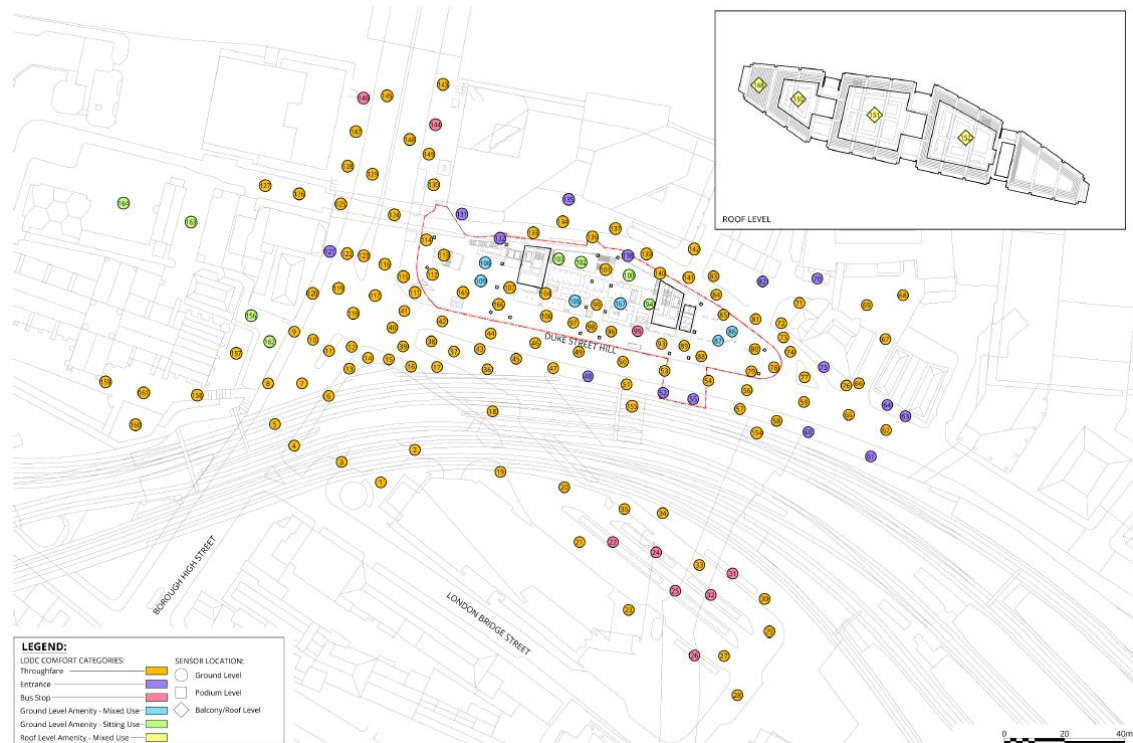
- the impacts of changes to highway movements;
- the impacts of existing emission sources of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> on future residents and users of the development;
- whether or not the proposed development is 'air quality neutral'; and
- the cumulative impacts on air quality of the proposed development in combination with cumulative schemes identified in the local area.

267. The demolition and construction phase of a development is temporary and short term. It is acknowledged that there would be an increase in the number of heavy goods vehicles (HGV) on the roads as a result of the demolition and construction phase of the development. All demolition and construction works have the potential to generate significant adverse effects on air quality without appropriate mitigation measures in place. In line with standard air quality guidance, mitigation measures will be put in place to ensure that there are no significant effects. Mitigation measures will include use of dust suppression equipment (such as fine water sprays); prohibition of HGV's from idling; use of a delivery schedule to minimise local disruption; recycling of on-site concrete; pre-demolition soft strip of the building followed by a floor by floor demolition; and provision of wheel washing facilities. With these mitigation measures in place there would be no significant air quality effects during the demolition and construction period, which by their nature would be short term and temporary.
268. In terms of the completed development, road traffic emissions associated with the development were assessed for nitrogen dioxide as having beneficial effects at St Olaf House and Denmark House on Tooley Street and at London Bridge Hospital (Urgent Care Centre). A slight adverse impact was identified at two receptor locations at Denmark House however these are not considered to be significant and Denmark House does not provide patient accommodation. Negligible effects were recorded at all other receptors and no significant effects were identified overall. For PM<sub>2.5</sub> and PM<sub>10</sub> all effects were negligible, and therefore not significant. On this basis there is no requirement for additional mitigation for the operational stage of the development and the scheme would meet or exceed Air Quality Neutral.

### Wind

269. Wind microclimate has been considered as part of the ES and the results are set out in Chapter 10 of the ES. The assessment seeks to understand whether any undesirable wind conditions would be created on site or within the surrounding area as a result of the proposed development. It considers if the resultant wind speed changes would be suitable for the intended use of specific locations around and within the site in terms of comfort and safety.
270. The assessment of the wind conditions requires a standard against which the measurements can be compared. This assessment of the wind tunnel results adopts the Lawson Comfort Criteria which are the well established guidelines that have been in use for over 30 years. The Lawson Criteria establishes four pedestrian activities (comfort categories) taking into account that less active pursuits require more benign wind conditions. The four categories include: sitting, standing, strolling and walking.

271. The assessment considered areas within the site, at ground level (such as thoroughfares and building entrances), roadways, pedestrian crossings, bus stops, amenity areas (at ground floor and podium level including seating areas), and roof terraces. In addition, areas around other buildings surrounding the site (such as building entrances), roads, nearby bus stops, car parks and thoroughfares have been tested. The image below details the probe locations that have been used as well as their current use:



272. The ES has tested a number of scenarios, including Configuration 1- baseline (the existing situation); Configuration 2 – The proposed development with existing surrounding buildings; Configuration 3 - The Proposed Development with Cumulative Surrounding Buildings; Configuration 4 - Proposed Development with Proposed Landscaping and the Existing Surrounding Buildings; Configuration 5 - Proposed Development with Proposed Landscaping and the Cumulative Surrounding Buildings; Configuration 6 - Proposed Development with Proposed Landscaping, Wind Mitigation and the Existing Surrounding Buildings; and Configuration 7 - Proposed Development with Proposed Landscaping, Wind Mitigation and the Cumulative Surrounding Buildings.
273. For the purposes of the assessment, the most relevant configurations that will be addressed in more detail are Configuration 1; Configuration 6 and Configuration 7. Configuration 1 relates to the existing building and surroundings (baseline). The ES notes that during the windiest season, the current conditions range from suitable for sitting to uncomfortable for all pedestrian use. There are several instances of conditions being one category higher than their intended use such as the bus stop (probe location 26) within London Bridge Bus Station whereby conditions are suitable for strolling as opposed to standing.
274. Wind conditions during the summer season are typically the same or one category calmer ranging from suitable for sitting to walking use within and



surrounding the site. There is one existing location with strong winds with the potential to be a safety concern for cyclists and more vulnerable pedestrians in the existing context. This is probe location 1 which sits at the west end of the News International Building where are winds exceeding 15m/s for approximately 23 hours per year.

275. Configuration 6 assess the wind conditions with the proposed development in place alongside the proposed landscaping, wind mitigation and the existing surrounding buildings. In terms of pedestrian comfort, the ES notes that during the windiest season, wind conditions would range from suitable for sitting to strolling use on-site and sitting to walking use off-site. During the summer season, wind conditions on and off-site would typically be one category calmer with on-site conditions ranging from sitting to standing use.
276. On-site thoroughfares around development would have wind conditions ranging from suitable for standing to strolling use during the windiest season and would represent negligible to minor/moderate beneficial effects. Off-site thoroughfares around the proposed development would have wind conditions similar to those in the baseline, ranging from suitable for sitting to uncomfortable for all pedestrian use during the windiest season. This would be consistent with the baseline scenario and would represent a negligible (not significant) effect. Furthermore, there would be no significant adverse effects at any entrances, bus stops, roads or car parks.
277. Ground floor amenity areas both on and off-site have also been considered. On-site ground floor amenity areas, such as the new public spaces would have wind conditions ranging from suitable for sitting to standing use during the summer season with effects from the development ranging from negligible to minor beneficial. Off-site ground floor amenity areas around the proposed development would have wind conditions similar to those in the baseline, ranging from suitable for sitting to standing use during the summer season and would represent a negligible effect.
278. With regards to strong winds, the only location where strong winds would be anticipated would be at probe location 1 and this is the same as the conditions under the baseline scenario and as such is not an impact of the development.
279. Configuration 7 is largely the same as Configuration 6 with the exception that Configuration 7 includes cumulative surrounding development within the assessment as opposed to the existing townscape. With the inclusion of the proposed landscaping and wind mitigation in the context of cumulative surrounding development, wind conditions off-site would be as presented in Configuration 6 throughout the year and there would be no significant adverse effects.
280. The ES demonstrates that wind conditions across the site and surrounding area would range from sitting to walking use throughout the year with generally calmer conditions in the summer months. Proposed mitigation would help reduce unsuitable conditions and it is noted that there would be no major effects as a result of the development. With the appropriate mitigation in place there would be no instances of strong winds or significant effects that would compromise safety, as a result of the proposed development. In order to ensure the outcomes

of the ES are realised with regards to wind microclimate and to ensure a suitable process to mitigate any further wind impacts that may be identified during and post construction, a Post Construction Wind Mitigation Review will be required as part of the S106 agreement.

### Ecology

281. The applicant has submitted a Biodiversity Net Gain Assessment. The application site presently has very low ecological value. The submitted assessment concludes that there is an opportunity to increase biodiversity net gain by approximately 981.98% through design measures such as bird boxes, bat boxes, green roofs, green walls, street trees, intensive podium planting and insect boxes. The Council's Ecologist has reviewed the application and raises no objection subject to conditions. The relevant conditions would be imposed on any consent issued whilst an Ecological Management Plan would be secured as part of the S106 Agreement

### Light pollution

282. The ES has considered light pollution as part of the daylight and sunlight assessment (Chapter 11) and notes that mitigation measures would be put in place such as occupancy sensors; dimmable lights; and exterior lights shut off at 23:00 (with the exception of the lights within the lower parts of the building and those required at street level to illuminate the public realm).
283. Pre curfew, the assessment showed that there would be no effect at Denmark House, Shard Place or Southwark Cathedral and Annex. A negligible effect was identified at London Bridge Hospital Main Building and St Olaf House for light intrusion pre-curfew (before 11pm).
284. Post curfew the assessment continued to show that there would be no effect at Shard Place or Southwark Cathedral and Annex. A negligible effect was identified at Denmark House and London Bridge Main Building for light intrusion post-curfew. The remaining building, 13 Tooley Street (St Olaf's House, London Bridge Hospital) would experience a significant effect (major adverse) for light intrusion post curfew.
285. The light intrusion to St Olaf House would be above the 5 lux threshold established by the ES and would affect rooms on two elevations. However, on one of the internal elevations of St Olaf House, the impacts only marginally exceed the 5 lux threshold, experiencing approximately 7.5 lux. On the closest elevation, approximately 15-17.5 lux would occur however, it is important to note that the building is of predominantly commercial use as opposed to patient accommodation and as such is not sensitive to light intrusion. It should also be noted that the assessment shows a worst-case scenario whereby the office would be fully lit at night. Taking this into account alongside the nature of the use of St Olaf House, the level of impact is considered to be acceptable.

### Socio-economics

286. Socio-economics is assessed in Chapter 6 of the ES. The assessment notes that the site currently provides up to 165 full time jobs and that the loss of the existing

employment on site, during demolition and construction, would be an adverse effect, albeit temporary and not significant. The demolition and construction phase of the development would be expected to generate up to 420 full time positions and whilst this effect would be beneficial, it would not be significant.

287. Once completed, the development would have the potential to generate up to 3,050 full time jobs which would be a net increase of up to 2,885 full time jobs on this site. This effect would be beneficial at local and borough level. In terms of local spending associated with the completed development, the proposal would have the potential to generate between £5.5 million and £7.1 million. Given the site is close to amenities, shops and transport links, it could be expected for much of this to be spent in the local economy. The new employees accommodated by the development would have a beneficial effect on the local economy through this additional spending. No mitigation measures are required in this instance.

### **Energy and sustainability**

288. Chapter 9 of the London Plan deals with all aspects of sustainable infrastructure and identifies the reduction of carbon emissions as a key priority. Policy SI2 requires all developments to be net zero carbon with a minimum onsite reduction of 35% for both commercial and residential. Non-residential development should achieve 15 per cent reduction through energy efficiency measures. Where developments are unable to meet net zero carbon targets any shortfall between the minimum 35% and zero carbon must be mitigated by way of a payment towards the carbon offset fund. The energy strategy for new developments must follow the London Plan Hierarchy (be lean/ be clean/ be green/be seen) and this must be demonstrated through the submission of an Energy Strategy with applications and post construction monitoring for a period of 5 years.
289. Southwark Plan Policies P69 and P70 reflect the approach of the London Plan by seeking to ensure that non-residential developments achieve a BREEAM rating of 'Excellent' and include measures to reduce the effects of overheating using the cooling hierarchy. The policies reflect the London Plan approach of 'lean, green and clean' principles and requires non-residential buildings to be zero carbon with an onsite reduction of at least 40%. Any shortfall can be addressed by way a contribution towards the carbon offset green fund.

### Whole life cycle and carbon capture

290. Policy SI 2 – Minimising Greenhouse Gas Emissions of the London Plan requires developments to calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken that would serve to reduce life-cycle carbon emissions.
291. Whole Life Cycle carbon emissions are those associated with the construction, use and eventual deconstruction of a development over its whole life cycle, considering impacts of construction materials, along with their repair, maintenance and replacements, as well as regulated and unregulated operational carbon emissions. A Whole Life Carbon Assessment and GLA Template was submitted.
292. The applicants submission states that they are aiming to maximise the

opportunity of reuse of materials in various applications, where feasible and that they continue to engage with the supply chain to look at alternative and innovative materials with lower embodied carbon in order that where new materials need to be used, they can have the lowest possible embodied carbon.

293. A pre-demolition audit has also been completed in order to assess what materials can be reused and recycled. The audit confirms that 100% of the bricks, concrete, insulation materials, timber, electrical equipment/materials, tiles/ceramics, metals, plasterboard, plastic, and soils used in the current building will either be reused, recycled or recovered. Of the remaining materials only asphalt (50%), hazardous waste (2%), floor coverings (5%), glass (5%) and vegetation (50%) would be sent to landfill. Overall, 51.1% of material currently used on the site would be reused, 48.5% would be recycled, 0.2% would be recovered and only 0.01% would be landfill.

### Carbon emission reduction

294. As previously stated, the London Plan requires a minimum 35% carbon reduction whilst the Southwark Plan requires a minimum 40% carbon reduction on site. Both policies accept that the difference between these targets and 100% can be balanced through a financial contribution to the carbon offset fund. The combination of the optimised passive design measures, energy-efficient plant selection and the innovative ambient loop heat pump design, result in an overall annual carbon reduction of 55% relative to the current 2013 Part L2A target emission rate (TER) for the building, using SAP10 carbon numbers. This would be accompanied by a carbon offset payment of £619,528 which would bring the development to carbon zero and achieve the aims of the policies of both the London Plan and the Southwark Plan. More detail on the strategy to achieve the 55% carbon reduction is set out below:

### Be Lean (use less energy)

295. The development would incorporate a range of passive and active design measures that would reduce carbon emissions through energy efficient design and construction. Passive measures would include:
- Optimising the building façade to achieve improved u values and taking advantage of the buildings orientation in designing the facades in order to maximise daylight penetration and minimise solar gain. For instance, the lift and stair cores are placed on the south façade where they shield the office space from excess solar glare; and
  - The use of natural ventilation to assist in managing heating and cooling;
296. Active measures would include:
- The use of Ground Sourced Heat Pumps (GSHP) and water sourced heat pumps;
  - Digital Building Management System and metering to monitor and control building services and enable optimum operation;
  - EC/DC motors for fan coil units;
  - Ventilation heat recovery;

- Low energy lighting;
- Use of low energy white goods; and
- High efficiency lifts/elevators.

### Be Clean (supply energy efficiently)

297. Currently there are no nearby district heating networks within 1km of the site that the development could connect to and no on-site CHP system is proposed given the negative carbon value that can be attached to CHP. As such, no carbon savings are reported from the 'Be Clean' stage of the energy hierarchy. The development would be futureproofed in order to ensure the potential to connect to a future district heating network should one become available.

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

298. The proposed development will employ the use of photovoltaic panels and a close loop ground sourced heat pump. The photovoltaic panels will be façade mounted and will be secured as part of an energy strategy in the legal agreement.
299. The close loop ground sourced heat pump would provide heating and cooling to the proposed building. Full details of this technology and how it will ultimately be applied would also be secured as part of an updated site wide energy strategy to be secured as part of the legal agreement.

### Be Seen (Monitor and review)

300. The London Plan asks developers to monitor energy use during occupation and to incorporate monitoring equipment to enable occupants to monitor and reduce their energy use. In accordance with London Plan policies it is appropriate to secure post completion monitoring within the s106 agreement. The applicant has confirmed that the development would be metered and that a building management system would be utilised. As built, the applicant commits to updating the contextual and energy performance data onto the Be Seen portal and would confirm that the metering installation is installed and correctly calibrated. When operational, the applicant commits to submitting energy performance data annually for at least five years and where performance differs from estimated performance then they would identify the cause and take action where necessary. These commitments would be secured in the legal agreement.

### Circular economy

301. Policy SI 7 Reducing Waste and Supporting the Circular Economy of the London Plan requires referable applications to promote circular economy outcomes and aim to be net zero-waste. These applications are required to submit a Circular Economy Statement to demonstrate:
1. How all materials arising from demolition and remediation works will be re-used and/or recycled.
  2. How the proposal's design and construction will reduce material demands and enable building materials, components and products to be

- disassembled and re-used at the end of their useful life.
3. Opportunities for managing as much waste as possible on site.
  4. Adequate and easily accessible storage space and collection systems to support recycling and re-use.
  5. How much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy.
  6. How performance will be monitored and reported.
302. The applicant seeks to develop the site in a manner that clearly demonstrates tangible sustainability measures to include health and wellbeing for the occupants, energy solutions and water saving features. This includes the creation of a significant street level open space. The building has been designed to be low carbon both in terms of its operation and embodied carbon for construction.
303. The proposed building would exceed the carbon emissions saving targets and would reduce water consumption and the use of unsustainable materials. A pre-demolition audit has been completed that maximises the use of reused, upcycled or recycled materials and works towards closing the loop of waste generation during construction with a 90% diversion from landfill. Procurement will follow sustainable lines and the supply chain would be required to source and deliver lower carbon materials to the site.
304. The development has been designed for ease of disassembly and the grid structure has been rationalised in order to promote pre-fabrication and modularization. The applicant has committed to optimise material use and use the whole life-cycle carbon analysis for assisting the decision making process. Finally, when operational, the development would employ a waste management and waste collection strategy that would maximise recycling. This would be secured by way of a condition.

### Overheating

305. London Plan Policy SI4 Managing heat risk and Southwark Plan policy P69: Sustainability standards set out the cooling hierarchy that should be followed when developing a cooling strategy for new buildings. The 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).
306. The steps set out in the hierarchy have been applied to the proposed development in sequence and systematically as part of the design process and is set out below in sequential order:

Minimise internal heat generation through energy efficient design

307. Glazing ratio optimised throughout the building to provide enough daylight and solar control glass applied to minimise solar gains. LED lighting is proposed to reduce internal heat gains.

Reduce the amount of heat entering the building through the orientation, shading, albedo, fenestration, insulation and green roofs and walls

308. The glazing ratio has been derived by data-driven design in limiting solar gains and managing daylight levels and respond to the solar exposure and façade orientation. The glazing area is maximised to the north for daylighting and optimised to the most exposed elevations to manage solar gains. Also, external shading elements have been dimensioned to assist in providing shading without significantly increasing embodied carbon. Roof terraces and green roofs are proposed to various office levels and the plant roof. The plant screen would be covered by a green wall and these urban greening strategies will contribute to creating a microclimate to reduce the urban heat island impact locally.

Manage the heat within the building through exposed internal thermal mass and high ceilings

309. A minimum of 2.9m of floor to ceiling height is proposed to the office areas. Moreover, concrete plank slabs will be exposed and provide thermal mass storage internally.

Use passive ventilation

310. Natural ventilation is possible through openings and vents in the façade for natural ventilation and for night-time cooling.

Use mechanical ventilation

311. Highly efficient mechanical ventilation with heat recovery is proposed for fresh air supply all year round.

Use active cooling systems (ensuring they are the lowest carbon options)

312. All previous measures contributed to reducing the peak cooling demand and decreasing the size of fan coil units for thermal comfort as well as using efficient heat pumps with waste heat recovery opportunity.

## BREEAM

313. Southwark Plan Policies P69 requires the development to achieve BREEAM 'excellent'. A BREEAM Pre-assessment report has been undertaken based on the illustrative scheme which demonstrates that an "excellent" standard can be achieved which meets the policy requirement and is therefore acceptable however the applicant has confirmed that they would be able to achieve BREEAM 'Outstanding' and as such an appropriate condition should be imposed on any consent issued in order to secure this standard.

## Planning obligations (S.106 agreement)

314. London Plan Policy Df1 and Southwark Plan Policy IP3 advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. These policies are reinforced by the Section 106 Planning Obligations 2015 SPD, which sets out in detail the type of development that qualifies for planning obligations. 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

315. Only defined site specific mitigation that meets the tests in Regulation 122 can be given weight.

Planning Obligation	Mitigation	Applicant Position
Archaeology	£11,171	Agreed.
Carbon offset	£619,528	Agreed.
Employment during construction	Provide 103 jobs, 103 short courses and 25 construction industry apprentices for Southwark residents or make a payment of £442,900	Agreed.
Employment in the development	Provide 302 sustained jobs for unemployed Southwark residents or make a payment of £1,298,600	Agreed.
Transport for London	Cycle hire - £220,000 Wayfinding - £33,000 Healthy Streets - A contribution is sought towards the Healthy Streets scheme.	Agreed. Agreed. Still under discussion with the applicant and would be finalised as part of any Stage II referral to the Mayor.
Transport (site specific)	Buses - £270,000 Roads - £8,000 Footways - £28,832 Raised tables - £40,000 DSP Bond - £24,472	Agreed.
Trees	Not specifically required unless unforeseen issues prevent trees from being planted or they die within five	Agreed.



	years of completion of the development in which case a contribution will be sought - £10,000 per tree.	
Admin fee	2% of the total of all financial contributions.	

316. The legal agreement would also secure the following S.278 works:

- Repave the footway including new kerbing fronting the development on Tooley Street (LB Southwark), London Bridge/Borough High Street and Duke Street Hill (TfL) in accordance with the SSDM requirements;
- Construct proposed vehicle crossover / loading bay entrance on Tooley Street using materials in accordance with SSDM requirements;
- Promote a TMO to amend any parking arrangements, modification of waiting restrictions along Tooley Street. Works to include road markings and signage;
- Reconstruct any redundant vehicle crossovers as footway along Tooley in accordance with the SSDM standards;
- Improve and or provide new pedestrian crossings to provide connectivity between the development and the River Walk;
- Provision of two raised tables and removal of street clutter on Tooley Street;
- Upgrade street lighting to current LBS standards. Include the possibility to provide lamp columns mounted to the new building in order to improve effective footway widths;
- Change all utility covers on footway areas to recessed type covers;
- Remove or relocate any street furniture fronting the development if required. Include the possibility to install any sign plates on the walls of the new building in order to improve effective footway widths; and,
- Rectify any damaged footways, kerbs, inspection covers and street furniture due to the construction of the development. footways should be paved with yorkstone natural stone slab paving and with 300mm wide granite kerbs.

317. The applicant would be required to enter into a separate S.278 Agreement with Transport for London for works taking place on the TLRN. Transport for London would require the following S.278 works:

- Providing/upgrading eastbound Duke Street Hill bus stop/cycle parking/lighting;
- Improving the pedestrian crossing on Duke Street Hill;
- Improving the layout of junctions of Duke Street Hill/London Bridge and Duke Street Hill/Tooley Street;
- Street tree planting/replacement of failures and a commuted sum for maintenance (to be agreed with TfL);
- Altering kerb lines on Duke Street Hill (temporary);
- Providing segregated cycle lane eastbound (temporary);
- Temporary stairs landing on TLRN (temporary); and

- Widening crossings on Duke St Hill and altered signal times (temporary).
318. The legal agreement must also include an obligation requiring the applicant to enter into a S.247 Agreement for the stopping up of the highway on this site. This refers specifically to the required Stopping Up of London Bridge Walk and the footbridge linking to London Bridge Station.
319. The legal agreement should secure the following strategy documents:
- Affordable Workspace Strategy - including a marketing and management strategy;
  - Construction Logistics Plan – including details of diversions for buses during construction, funding for any bus diversions and how the temporary pedestrian bridge will provide continued bridge access during the course of demolition and construction;
  - Delivery and Servicing Plan – including full details of the delivery consolidation service;
  - Demolition and Construction Environmental Management Plan – setting out appropriate dust monitoring and noise assessment/monitoring;
  - Ecological Management Plan;
  - Employment Skills and Business Support Plan;
  - Estate Management Plan – setting out how the public realm would be managed and maintained in addition to full details of public access and security;
  - Landscaping Strategy;
  - Site Wide Energy Strategy – including full details of Be Seen monitoring, details of PV panels and commitment to future proofing the site for onward connection to any future district heating network;
  - Theatre Design Strategy;
  - Travel Plan; and
  - Wind Mitigation Post Construction Review.
320. In the event that an agreement has not been completed by 31 December 2022, the committee is asked to authorise the director of planning to refuse permission, if appropriate, for the following reason:
321. In the absence of a signed S106 legal agreement there is no mechanism in place to mitigate against the adverse impacts of the development through contributions and it would therefore be contrary to London Plan (2021) Policies DF1 (Delivery of the Plan and Planning Obligations) T9 (Funding transport infrastructure through planning) and E3 (Affordable workspace), Southwark Plan (2022) Policies P28 (Access to employment and training), P31 (Affordable Workspace), P70 (Energy), IP3 (Community infrastructure levy (CIL) and Section 106 planning obligations), the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015), Paragraph 57 of the NPPF.

### **Mayoral and borough community infrastructure levy (CIL)**

322. 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 invests in London as a whole, primarily Crossrail. Southwark's CIL will provide for infrastructure that supports growth in Southwark. In this instance, based on information provided by the applicant, an estimated Mayoral CIL payment of £7,670,315.99 and a Southwark CIL payment of £3,580,062.40 would be due. This figure is an estimate only, and would be calculated in more detail when CIL Additional Information and Assumption of Liability forms are submitted prior to implementation.

## Community involvement and engagement

323. The developer has submitted a statement of community involvement that summarises the consultation that has taken place on the application. This includes an extensive programme of pre-application meetings in addition to consultation and engagement with key stakeholders and the wider community. The consultation area contained approximately 4,300 addresses surrounding the site, with a mix of residential and commercial uses. In addition to consulting with residents, the consultation programme identified the following political, community and business stakeholders:

Political	Community	Business
<ul style="list-style-type: none"> <li>• Borough &amp; Bankside Ward councillors</li> <li>• Florence Eshalomi AM MP</li> <li>• LB Southwark Cabinet Members</li> <li>• London Bridge &amp; West Bermondsey Ward Councillors</li> <li>• Neil Coyle MP</li> </ul>	<ul style="list-style-type: none"> <li>• Bankside Open Spaces Trust</li> <li>• Fair Community Housing</li> <li>• Historic England</li> <li>• Historic Royal Palaces</li> <li>• Leathermarket JMB</li> <li>• Living Bankside</li> <li>• Southwark Cathedral</li> <li>• Southwark Cyclists</li> </ul>	<ul style="list-style-type: none"> <li>• Better Bankside</li> <li>• Borough Market</li> <li>• Colechurch House building tenants</li> <li>• Guy's &amp; St Thomas' NHS Trust</li> <li>• HCA</li> <li>• King's College London</li> <li>• London Bridge Experience</li> <li>• Network Rail</li> <li>• News International</li> <li>• REM</li> <li>• Sellar</li> <li>• Shangri La Hotel</li> <li>• St Martins Property Group</li> <li>• Team London Bridge BID</li> <li>• TfL</li> <li>• The Arch Company</li> </ul>

324. The applicant has set out the following stakeholder meetings that took place as part of the consultation programme:

Meeting	Date	Attendees	Summary of Discussions
London Bridge & West Bermondsey ward councillors	17 June 2020	<ul style="list-style-type: none"> <li>• Cllr Humaira Ali</li> </ul>	<ul style="list-style-type: none"> <li>• Proposed park and public realm</li> </ul>

		<ul style="list-style-type: none"> <li>• Cllr William Hougbo</li> <li>• Cllr Damian O'Brien</li> </ul>	<ul style="list-style-type: none"> <li>• Public access to roof terrace</li> <li>• Security of park.</li> </ul>
LB Southwark Cabinet	24 June 2020	<ul style="list-style-type: none"> <li>• Cllr Johnson Situ</li> <li>• Cllr Stephanie Cryan</li> </ul>	<ul style="list-style-type: none"> <li>• Height</li> <li>• Possible occupiers inc. Southwark Playhouse</li> <li>• Sustainability.</li> </ul>
Team London Bridge BID	16 June 2020	<ul style="list-style-type: none"> <li>• Nadia Broccardo</li> <li>• Jack Skillen</li> </ul>	<ul style="list-style-type: none"> <li>• Public realm,</li> <li>• connectivity, area masterplan, bridge removal.</li> </ul>
Leathermarket JMB	19 June 2020	<ul style="list-style-type: none"> <li>• Andy Bates</li> <li>• Michele King</li> </ul>	<ul style="list-style-type: none"> <li>• Local employment opportunities.</li> </ul>
The Arch Co	22 June 2020	<ul style="list-style-type: none"> <li>• Clare Fowler</li> <li>• Lorna Blake</li> </ul>	<ul style="list-style-type: none"> <li>• Area masterplan, station works.</li> </ul>
Southwark Cathedral	24 June 2020	<ul style="list-style-type: none"> <li>• Andrew Nunn</li> <li>• Matthew Knight</li> </ul>	<ul style="list-style-type: none"> <li>• Impact on views, wind and shadowing on the Cathedral.</li> </ul>
Landscape workshop 1 with BOST	22 July 2020	<ul style="list-style-type: none"> <li>• Jessica Beatty</li> <li>• Tim Wood</li> </ul>	<ul style="list-style-type: none"> <li>• Design workshop focused on the proposed park and landscape.</li> </ul>
Landscape workshop 2 with BOST	29 July 2020	<ul style="list-style-type: none"> <li>• Tim Wood</li> <li>• Deborah Nagan</li> </ul>	<ul style="list-style-type: none"> <li>• Follow-up to first workshop.</li> </ul>
London Bridge Experience	19 August 2020	<ul style="list-style-type: none"> <li>• James Kislingbury</li> <li>• Danny Scriven</li> </ul>	<ul style="list-style-type: none"> <li>• Neighbourly issues relating to proposed development and construction.</li> </ul>
Southwark Cathedral Fabric Advisory Committee (FAC)	8 September 2020	<ul style="list-style-type: none"> <li>• Members of the FAC</li> </ul>	<ul style="list-style-type: none"> <li>• Environment impacts on the Cathedral.</li> </ul>

Pedestrian Bridge Working Group	17 September 2020	<ul style="list-style-type: none"> <li>• Network Rail</li> <li>• TfL</li> <li>• City of London</li> <li>• Town Legal</li> <li>• Cllr Dan Taylor</li> </ul>	<ul style="list-style-type: none"> <li>• Improving the pedestrian access between London Bridge and London Bridge station at ground level.</li> </ul>
STAMP (Shad Thames Area Management Partnership)	1 October 2020	<ul style="list-style-type: none"> <li>• Janet Morris</li> </ul>	<ul style="list-style-type: none"> <li>• Discussion of the park proposals and other public realm improvement.</li> </ul>
Team London Bridge BID	5 October 2020	<ul style="list-style-type: none"> <li>• Nadia Broccardo</li> <li>• Jack Skillen</li> </ul>	<ul style="list-style-type: none"> <li>• Activation of Tooley St.</li> <li>• In support of removing footbridge.</li> </ul>

325. In terms of public consultation, Covid 19 required that consultation events were undertaken online. The applicant held a Zoom webinar on Saturday 20 June between 10am and 11am and then a second webinar on Tuesday 23 June between 4.30pm and 5.30pm. The webinar was an opportunity for the Applicant's team to present the initial proposals to neighbours and stakeholders, giving neighbours the opportunity to ask questions and get clarifications on the scheme.
326. Neighbouring residents and businesses were formally notified about the exhibition by a flyer distributed to approximately 4,300 addresses in the local area. A copy of the flyer is included in Appendix 3 of the Statement of Community involvement.
327. The SCI confirms that around 30 people attended the webinar and the key issues raised were:
- Clarification was sought on the access route to the river walk.
  - The main issues with the current building, including anti-social behaviour, graffiti and petty crime
  - Support towards the public park and public realm improvements
  - Impact on traffic flow as a result of removing the footbridge
  - Anticipated timescales for the planning application and construction
328. A further public consultation event was undertaken on Thursday 1 October between 12pm and 8pm and again on Saturday 3 October between 10am and 2pm. This was a more traditional face to face exhibition consultation event and was held at Unit 2, London Bridge Walk. As well as repeating the previous steps of sending letters to residents, neighbours and occupiers, the applicant advertised the event in The Southwark News, a copy of which is included in the

SCI.

329. In order to cater to those who were unable to attend an in-person exhibition, the applicant held two further Zoom webinars on Tuesday 6 October and Wednesday 7 October from 5pm to 6pm.
330. As part of its statutory requirements the Local Planning Authority sent letters to surrounding residents, displayed site notices in the vicinity, and issued a press notice publicising the planning application. Adequate efforts have, therefore, been made to ensure the community has been given the opportunity to participate in the planning process. Details of consultation and any re-consultation undertaken by the Local Planning Authority in respect of this application are set out in the appendices.

### **Consultation responses from local groups**

331. Better Bankside – Concerns are raised regarding the potential use of Montague Close and Borough Market for servicing and consider that a consolidated servicing strategy should be employed on this site. Whilst the automated cycle store is supported there is a concern that employees using non-office spaces would not benefit from changing/shower facilities. There is a concern that the development does not meet London Plan cycle standards. Generally, Better Bankside welcome the improved permeability through and around the site and consider the public park to be well considered but query how micro-climate and user comfort of these spaces have been tested, given how exposed the principal park areas fronting on to Duke Street Hill and Borough High Street are likely to be. Better Bankside suggest that further attention needs to be given to the urban realm along the Tooley Street frontage and how it connects under London Bridge and suggest that this whole stretch should be treated as a shared space environment and is not a secondary frontage to the development.
332. **Response** – The development would implement a delivery consolidation strategy and this would be secured as part of the S106 agreement. The intention is that Tooley Street be the main access and egress point for vehicular traffic and this could be secured as part of the obligation. The primary use of the site is as an office and office staff who use either of the cycle stores (basement or automated), would have access to the changing and shower facilities. The microclimate of the park has been fully considered and it would be well lit with wind conditions appropriate for its use. The development would result in significant improvements on Tooley Street which lacks animation and activity along this stretch however the Council's Transport department would not be supportive of a shared surface environment due to road safety implications.

### **Consultation responses from external and statutory consultees**

333. Arqiva – No objections  
**Response** – Noted.
334. Borough Market - The Trustees of Borough Market Southwark (TBMS) are generally welcoming of investment in the area but have raised some concerns about the impact of the proposals on the operation of the market. These concerns relate primarily to delivery and servicing, the potential impacts of using Montague

Close and Bedale Street as a servicing route and the impacts the increased traffic levels would have on the market as well as pedestrian conflict. TBMS seek assurances that all construction traffic be restricted from using Montague Close/Bedale Street and that they be consulted on future Construction and Environmental Management Plans. With regard to the retail units being proposed, TBMS would welcome the introduction of artisan/independent traders and small scale cafes and would urge the Council to impose conditions/obligations to prevent large food uses and supermarkets from the site. TBMS also request that the site provide public toilets and that a wayfinding strategy be secured which TBMS should be involved in the development of.

335. **Response** – Whilst the servicing strategy does indicate that the site could be accessed from Tooley Street and Montague Close, it is the intention that Tooley Street be the main route for vehicular access and egress to the site and this can be secured as part of the Delivery and Service management Plan obligation. Construction traffic would access the site from Tooley Street or Duke Street Hill and this would be secured under the Construction Environmental Management Plan on which the Council agree to consult TBMS. Given the location of the proposed development opposite London Bridge Station as opposed to within Borough Market, it is not considered appropriate to restrict the type of end user that could occupy the retail units however it should be noted that the size, design and location of the retail units are such that they would likely not meet the requirements of a supermarket or large scale food use. Wayfinding has been secured as part of the legal agreement through TfL's established Legible London scheme.
336. City of London – The City of London support the proposed re-development and have commented that the proposal is well designed and sustainable with important amenities for occupiers. The inclusion of a new theatre for Southwark Playhouse, bringing this cultural use back to London Bridge and making its creative output and community outreach more accessible is supported. The scheme's inclusion of a new public park for London will be an amenity for workers, residents, and visitors as well as the contribution it will make to health and wellbeing in the area. The replacement of the existing footbridge on London Bridge Walk, with a new safe and accessible pedestrian bridge of lightweight and minimalist design will enable a more pleasant route for local and commuting pedestrians to and from London Bridge. It also opens up historic views to Southwark Cathedral that have been long obscured.  
**Response** – Noted.
337. Environment Agency – No objection subject to conditions.  
**Response** – Noted and agreed.
338. Greater London Authority – The GLA have commented that they are strongly supportive of the proposed development in principle. The principle of the proposed office-led mixed use redevelopment within the CAZ and Opportunity Area is strongly supported. The proposal would provide a significant quantitative increase and qualitative enhancement to the existing office, retail, leisure and cultural offer. The Council should robustly secure the proposed affordable workspace and the new theatre.

339. Overall, the scheme is of a high design and architectural quality. Whilst the height and massing could be supported, further information is required on the functional and environmental impacts of the tall building. Further clarification on inclusive access is required. The fire statement should be revised to provide further information prior to Stage 2 referral. The proposal would marginally diminish the viewer's ability to perceive and appreciate St Paul's Cathedral from LVMF view 2A.1 and would have less than substantial harm to the setting of the Grade I listed St Paul's Cathedral from this strategic view.
340. The proposal would result in less than substantial harm to the setting of the Tower of London World Heritage Site (and designated heritage assets within it); the Grade I listed St Paul's Cathedral and Southwark Cathedral, and other designated heritage assets. At this stage, it is considered that the public benefits in terms of public realm improvements, provision of affordable workspace and employment creation could outweigh the identified harm.
341. The proposed cycle and car parking is broadly acceptable. Further clarification on cycle parking access and queues management; a replacement cycle hire docking station; and further consideration of off-site cycle parking is required to improve the overall quantum. The removal of the pedestrian footbridge and management of pedestrian flows at Duke Street Hill, including road safety requires further consideration. Given the development's impact on TLRN, footways and cycling routes it will be important to consider and enhance where appropriate the local cycling and walking network and facilities. In this respect, a section 278 agreement is required to secure proposed public realm works and financial contributions are sought towards public realm improvements, improved signage and cycle hire re-provision and other infrastructure works. The proposed servicing strategy and construction management requires further clarification. Travel plans, delivery and servicing plans and construction logistics plans should also be secured.
342. Further information and amendments to energy strategy, urban greening, flood risk assessment, drainage strategy, air quality assessment, and circular economy strategy is required.
343. Response – The applicant has suitably revised the Fire Strategy to take into account the comments made by the GLA at Stage I. Further information has also been provided on energy, flood risk, drainage, air quality and circular economy. Officers have reviewed this information alongside the detailed comments made by the GLA and consider that the information suitably addresses all concerns. This would be confirmed with the GLA as part of the Stage II referral process.
344. It is acknowledged that the UGF of 0.28 does not meet the London Plan policy requirement of 0.3 and as such a landscaping strategy attached to the legal agreement will ensure that the applicant maximises the landscaping potential of the site and that all efforts to increase this score would be made.
345. The overall quantum of cycle parking has now been improved in light of the GLA comments and there would now be an overprovision when assessed against the London Plan standards. Further provisions such as a cycle hire docking station, S.278 works and financial contributions have been secured in the proposed Heads of Terms for the legal agreement. Additionally, the applicant is re-



providing the pedestrian footbridge and as such this reduces the potential for road safety impacts on Duke Street Hill. The theatre and other affordable workspace would be secured as part of the legal agreement.

346. Historic England - Historic England has no issues with the proposed redevelopment of Colechurch House in principle, and recognises the significant opportunities that the scheme presents in improving the urban environment and public realm within and around the site. Concerns have been expressed about the impact of the proposed development on St Paul's Cathedral and the Tower of London. The development site is located within the Wider Setting Consultation Area for two views protected by the Mayor of London, these are Parliament Hill summit to St Paul's Cathedral (LVMF 2A.1) and Kenwood viewing gazebo to St Paul's Cathedral (LVMF 3A.1).
347. The protected views of St Paul's Cathedral have been affected by existing and consented tall building development around London Bridge Station, the largest of which is The Shard, which was completed in 2012. In View 2A.1 these appear almost as a wall of development that partially blocks the silhouette. However, the dome remains clear of any development from its lantern eastwards in this view, preserving the suburban backdrop and ensuring the cathedral's dominance within a wider-London context. The tall buildings around London Bridge have also affected other important heritage views including those from the Inner Ward of the Tower of London World Heritage Site which is located across the Thames to the north east of the development site.
348. The impact of these proposals on St Paul's Cathedral in the Protected Vista from Parliament Hill (LVMF 2A.1) is the most sensitive. By appearing directly behind the peristyle of the dome - a key architectural element of Wren's design, the proposed development would fail to "preserve or enhance the clarity with which the silhouette of the Cathedral can be distinguished from its background" thus conflicting with the guidance contained within the LVMF SPG. Historic England consider that the impact of the development in this view would cause a medium, yet serious level of less-than-substantial harm to the significance of St Paul's Cathedral. Historic England also consider that the development would cause some harm to the Grade I and scheduled buildings that frame Tower Green at the west end of the Inner Ward of the Tower of London.
349. **Response** - These issues have been set out in full in the design and heritage section of the main report. In the LVMF view from Parliament Hill the proposal is located immediately to the left of the dome of St Paul's. The buildings stepped form responds deliberately to this specific view with the first step aligning with the top of the peristyle. Beyond that and from the second step the building is angled away from the dome. The zoomed-in view demonstrates that the stepped profile does not interact with the dome above the peristyle and it will remain below the distant horizon. Officers accept that there is some limited harm arising to this LVMF View (2A.1) due to the close interaction between the silhouette of the building and the dome and peristyle. Notwithstanding this, officers consider the harm to be of the lowest order of less than substantial harm, only apparent in the highly zoomed in view and not detracting from the viewer's ability to recognise and appreciate St Paul's Cathedral.
350. In the view from Kenwood House the proposal will appear a short distance to the

left of the dome of St Paul's Cathedral. Here too the proposal will be at the edge of the backdrop Wider Setting Consultation area of St Paul's. The zoomed-in view once again demonstrates that the proposal is lowest closest to the dome and rising away from it and stays well below the distant horizon. Officers consider that the proposal does not give rise to harm in this LVMF View (3A.1) and will not affect the viewer's ability to recognise and appreciate the Strategic Landmark of St Paul's Cathedral.

351. In terms of the Tower of London views, the proposal would be visible from the wider Tower environs, set behind the More London development and the river frontage buildings and within the Shard Cluster, similar in height to the recently completed Fielden House and London Bridge Place buildings. The TVIA demonstrates that the building would not be visible from the views of highest significance identified in the Tower of London Setting Study – the Inner Ward views around the Tower itself and the views from Royal Mint Court. In this respect it is considered that the proposal does not give rise to harm to the Outstanding Universal Value of the Tower of London World Heritage Site.
352. London Borough of Camden – No objection.  
**Response** – Noted.
353. London Borough of Lambeth – No objections.  
**Response** – Noted.
354. London Fire Brigade – LFB have commented that they note the provisions of the Fire Safety Strategy.  
**Response** – Noted.
355. Metropolitan Police – The Metropolitan Police consider that this development is suitable to achieve Secured By Design accreditation, and in order to assist the development with achieving Secured By Design standards, relevant conditions regarding secured by design measures and accreditation should be imposed.  
**Response** - Noted and agreed, the relevant conditions would be imposed on any consent issued.
356. NATS – No objection.  
**Response** – Noted.
357. Natural England – No objection.  
**Response** – Noted.
358. Network Rail – Support the principle of the proposals and request informatives regarding asset protection.  
**Response** – Noted. The relevant informatives would be added to any consent issued.
359. Royal Borough of Greenwich – No objections.  
**Response** – Noted.
360. Southwark Cathedral – Fully supportive of the removal of the footbridge which destroys an ancient view of the cathedral and are not supportive of a replacement footbridge.

**Response** – The existing footbridge is large, bulky and covered and is a prominent feature in the street and views along Duke Street Hill. The proposed replacement footbridge would be lightweight, open to the sky and with transparent balustrades so as to reduce and minimise any impacts on views along Duke Street Hill.

361. Team London Bridge – Team London Bridge support the re-provision of a footbridge and consider that the new footbridge would allow for improved views of heritage assets in the local area. Concerns have been raised that the UGF score has reduced from 0.3 to 0.28 and TLB consider that this could be improved by providing green walls, more mature trees and increased planting at the west end of Duke Street Hill. Whilst TLB welcome the opportunity to provide a new public realm under the building, the finishes and detailed design will need to be carefully considered. TLB would welcome additional detail on bike lifts, cycle hire docking stations, servicing arrangements and sustainability targets.
362. **Response** – The final, refined design of the footbridge would be secured by condition as will all material finishes and final design/planting of the public realm. Further opportunity to maximise planting is secured as part of the Landscaping Strategy in the legal agreement. The legal agreement would also secure a Delivery and Servicing Management Plan, and Energy Strategy. A contribution towards cycle hire has been secured and TfL will be involved in finalising a location. In terms of the cycle lift, this would be accessed from Tooley Street and would provide direct access to the cycle store area.
363. Thames Water – No objections subject to relevant conditions and informatives.  
**Response** – Noted and agreed, the relevant conditions and informatives would be attached to any consent issued.
364. Theatres Trust – The Theatres Trust welcome the inclusion of this theatre space within the proposed development and wish to see that it is delivered. The Theatres Trust offer detailed advice and comments with regards to signage/promotion/wayfinding in order to ensure the visibility of the theatre as well as advice regarding the bar and restaurant which will be an important part of revenue generation for the occupying theatre. Detailed comments and advice have been given with regards to the fit out of the theatre space including structural/acoustic/drainage/technical details as well as comments with regard to evacuation, capacity, accessibility and movement space. The Theatres Trust recommend that the applicant appoint a specialised theatre consultant to provide advice both on the design and co-ordination with the base build. Their expertise would also be beneficial in determining the scoping of and specification of works for the fit out for example best materials, fixtures and fittings for the theatre.
365. **Response** – A detailed theatre design strategy would be secured as part of the S106 Agreement. This would secure details of the final design and finish of the theatre and the Council agree that The Theatres Trust should be a consultee on this document. This would ensure that the detailed technical comments provided by The Theatres Trust can be considered during the next stage of the design process. The applicant has been working with Southwark Playhouse to date and it is considered that the input of The theatres Trust would be beneficial.
366. Transport for London – When initially consulted on the proposed development,

TfL objected to the removal of the pedestrian footbridge. It was considered that the removal of the pedestrian footbridge would result in adverse network impacts due to the displaced pedestrians trying to access/egress London Bridge Station, an associated reduction in pedestrian comfort levels, impacts on road safety and the bus station due to increased pedestrian flow and impacts on future network management. As such, the applicant was encouraged to revise the scheme to reinstate the pedestrian footbridge and this was fully supported by TfL and the access to the new footbridge being via lifts and escalators is considered to make the bridge more attractive for use than the current footbridge. TfL consider that a contribution should be made to fund any public transport diversions that may be required during construction as well as contributions towards cycle hire, healthy streets and legible London signage. TfL have requested that the legal agreement secure a Travel Plan, Construction Logistics Plan and Delivery/Service Management Plan.

367. **Response** – Noted and agreed. The revised scheme would provide a replacement footbridge and this addresses the majority of TfL's concerns. The relevant contributions sought by TfL have been agreed with the applicant and the legal agreement would secure the requested strategies and plans and these would be fully consulted upon with TfL.
368. Twentieth Century Society – Object to the demolition of Colechurch House which they consider to be a non-designated heritage asset. The Society also considers that the demolition of this building contravenes the spirit of paragraph 148 of the NPPF. Buildings like this also contain a large quantity of embodied carbon and substantial environmental harm results from their demolition.
369. **Response** – Whilst there are many fine examples of brutalist architecture in the Borough and central London, the existing Colechurch House is considered to be of limited architectural or heritage merit. Whilst it would be possible to refurbish the building, it would not be possible to address some of the more significant shortcomings of the building, such as the harsh frontages on Duke Street Hill and Tooley Street nor would it be possible to realise the significant benefits that come forward from the proposed scheme such as employment creation, affordable workspace, a new theatre and a significantly improved public realm.

### **Community impact and equalities assessment**

370. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights.
371. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
372. 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:
1. The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act

2. 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
3. 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.

373. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership. The proposal would result in the provision of a more accessible footbridge across Tooley Street which would benefit those with mobility impairments. Similarly the provision of a new purpose built theatre would enable that to also be fully accessible, both for staff and for audiences. The training/apprentice programme during construction would positively benefit local communities, which have a high proportion of people from BAME backgrounds. The existing business uses on the site including a number of shops would close, but these would not impact individuals with protected characteristics.

### **Human rights implications**

374. This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.
375. This application has the legitimate aim of providing a mixed use commercial development incorporating offices, retail, theatre, gym and a new public realm. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

### **Positive and proactive statement**

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

377. The council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the development plan and core strategy and submissions that are in accordance with the application requirements.

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

Was the pre-application service used for this application?	YES
If the pre-application service was used for this application, was the advice given followed?	YES
Was the application validated promptly?	YES
If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	YES
To help secure a timely decision, did the case officer submit their recommendation in advance of the agreed Planning Performance Agreement date?	YES

### **CONCLUSION**

378. The redevelopment of Colechurch House to provide a large scale commercial scheme is supported by current development plan policies as is the principle of a taller building. The development would result in a substantial increase in jobs and employment opportunities due to the provision of high quality office accommodation and a substantial increase in commercial floorspace on a central, sustainable, highly connected brownfield site. The development has the potential to provide up to 3,050 jobs on a site that benefits from the highest levels of public transport availability. Sustainable transport is promoted through the provision of extensive and high quality cycling facilities including parking, showering facilities, changing rooms and an automated cycle store.
379. The detailed design of the building, elevating the ground floor well above ground level, allows the development to bring forward significant public realm benefits through the creation of a site wide landscaped public space at the base of the building. This space would provide a much needed green space in a central location that would be a benefit enjoyed by workers, visitors and residents. The new public realm would improve pedestrian connectivity due to the new legible north south route through the site and would open up views to the Grade II listed London bridge Hospital and St Olaf House. The public realm would achieve an UGF of 0.28 which is considered acceptable given the improvement in landscaped space over the consented scheme and that that design of the development has maximised the landscaping potential. The new public realm is a key design feature of the new development and is considered to be a significant benefit of the scheme, greatly improving the street level experience of this part of London Bridge.
380. The development would incorporate a new theatre space, providing a new home for Southwark Playhouse. The theatre would be offered to Southwark Playhouse on affordable terms with a discount equivalent to 75% of market rent. The

provision of a theatre in this location would bolster Southwark's thriving leisure, arts and cultural sector. Promotion of new cultural facilities and specifically a theatre would allow Southwark to build on its strengths and further enhance the vibrant arts, leisure and cultural scene. This would bring further employment, engage local people and visitors, and create opportunities for training and learning. The delivery of a theatre is fully supported by both London Plan and Southwark Plan policies and is considered to be a positive element of the scheme that would enhance the cultural offering in this vibrant part of London.

381. The proposal would not give rise to significant harm to neighbouring amenity by way of overlooking, loss of privacy, noise or disturbance. It is recognised that there will be some adverse impact by way of daylight/sunlight impacts to London Bridge Hospital. Given the small number of windows overall that would experience significant effects and the site specific circumstances, including the nature of the affected rooms and windows, it is considered that the overall impact would be acceptable given the benefits of the proposed. On balance, officers consider that, when reading the BRE guidance with the required flexibility, and in view of the positive benefits of the development proposal, the degree of harm to amenity would not justify withholding planning permission in this case.
382. Whilst there would be some harm to the views of some nearby heritage assets, including St Pauls Cathedral, Southwark Cathedral and the Tower of London, this is considered to be less than substantial harm which would be outweighed by the wider benefits of the proposal such as significant employment benefits, the provision of a new theatre on affordable terms to Southwark Playhouse, additional affordable workspace, greatly enhanced public realm, improved pedestrian and visual connectivity and the provision of a high quality building that would make a valuable contribution to the townscape.
383. The development would achieve Carbon Zero status through a combination of an in lieu payment and a 55% carbon reduction on site. The on-site carbon reduction of 55% alongside the scheme being expected to achieve BREEAM Outstanding will result in one of the most energy efficient and sustainable buildings in London.
384. Developments of this size and nature have the potential for significant environmental impacts and therefore an Environmental Statement has been submitted. The impacts identified in the Environmental Statement have been assessed and taken into account and should be considered in determining the application. No impacts of a significant scale have been identified which are not capable of being mitigated through detailed design, through conditions, or through provisions in the S106 agreement.
385. The application is considered to be in compliance with the development plan, and emerging documents, when read as a whole, and It is therefore recommended that planning permission be granted, subject to conditions, the timely completion of a S106 Agreement and referral to the Mayor of London.

## BACKGROUND DOCUMENTS

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

## APPENDICES

No.	Title
Appendix 1	Recommendation (draft decision notice)
Appendix 2	Relevant planning policy
Appendix 3	Planning history of the site and nearby sites
Appendix 4	Consultation undertaken
Appendix 5	Consultation responses received.

## AUDIT TRAIL

<b>Lead Officer</b>	Stephen Platts, Director of Planning and Growth	
<b>Report Author</b>	Terence McLellan, Team Leader	
<b>Version</b>	Final	
<b>Dated</b>	31 August 2022	
<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments included</b>
Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
<b>Date final report sent to Constitutional Team</b>		31 August 2022



## APPENDIX 1

**Development Management – 14.09.2022 – Draft  
Recommendation**

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

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

Reference no. / Plan/document name / Revision:	Received on:
A-P-053-XX-01 - LONGITUDINAL SECTION AA GENERAL ARRANGEMENT SECTION Plans - Proposed 02	12.10.2020
A-P-053-XX-02 - CROSS SECTION BB GENERAL ARRANGEMENT SECTION Plans - Proposed 02	12.10.2020
A-P-053-XX-03 - CROSS SECTION CC GENERAL ARRANGEMENT SECTION Plans - Proposed 02	12.10.2020
A-P-064-XX-01 - SOUTH ELEVATION GENERAL ARRANGEMENT ELEVATION Elevations - Proposed 02	12.10.2020
A-P-064-XX-02 - NORTH ELEVATION GENERAL ARRANGEMENT ELEVATION Elevations - Proposed 02	12.10.2020
A-P-064-XX-03 - EAST AND WEST ELEVATION GENERAL ARRANGEMENT ELEVATION Elevations - Proposed 02	12.10.2020
A-P-031-01-01 - LEVEL 01 OFFICE GENERAL ARRANGEMENT PLAN Floor Plans - Proposed	12.10.2020
A-P-031-02-01 - LEVEL 02 OFFICE RECEPTION/OFFICE GENERAL ARRANGEMENT PLAN Floor Plans - Proposed	12.10.2020

A-P-031-03-01 - LEVEL 03 OFFICE GENERAL ARRANGEMENT PLAN Floor Plans - Proposed	12.10.2020
A-P-031-04-01 - LEVEL 04 OFFICE GENERAL ARRANGEMENT PLAN Floor Plans - Proposed	12.10.2020
A-P-031-05-01 - LEVEL 05 OFFICE GENERAL ARRANGEMENT PLAN Floor Plans - Proposed	12.10.2020
A-P-031-06-01 - LEVEL 06 OFFICE GENERAL ARRANGEMENT PLAN Floor Plans - Proposed	12.10.2020
A-P-031-07-01 - LEVEL 07 OFFICE GENERAL ARRANGEMENT PLAN Floor Plans - Proposed	12.10.2020
A-P-031-08-01 - LEVEL 08 OFFICE GENERAL ARRANGEMENT PLAN Floor Plans - Proposed	12.10.2020
A-P-031-09-01 - LEVEL 09 OFFICE GENERAL ARRANGEMENT PLAN Floor Plans - Proposed	12.10.2020
A-P-031-10-01 - LEVEL 10 OFFICE GENERAL ARRANGEMENT PLAN Floor Plans - Proposed	12.10.2020
A-P-031-11-01 - LEVEL 11 OFFICE/RESTAURANT GENERAL ARRANGEMENT PLAN Floor Plans - Proposed	12.10.2020
A-P-031-12-01 - LEVEL 12 OFFICE GENERAL ARRANGEMENT PLAN Floor Plans - Proposed	12.10.2020
A-P-031-13-01 - LEVEL 13 OFFICE GENERAL ARRANGEMENT PLAN Floor Plans - Proposed	12.10.2020
A-P-031-14-01 - LEVEL 14 OFFICE/ROOF GARDEN GENERAL ARRANGEMENT PLAN Floor Plans - Proposed	12.10.2020
A-P-031-15-01 - LEVEL 15 OFFICE GENERAL ARRANGEMENT PLAN Floor Plans - Proposed	12.10.2020
A-P-031-16-01 - LEVEL 16 OFFICE GENERAL ARRANGEMENT PLAN Floor Plans - Proposed	12.10.2020

A-P-031-17-01 - LEVEL 17 OFFICE ROOF GARDEN GENERAL ARRANGEMENT PLAN Floor Plans - Proposed	12.10.2020
A-P-031-18-01 - LEVEL 18 OFFICE GENERAL ARRANGEMENT PLAN Floor Plans - Proposed	12.10.2020
A-P-031-19-01 - LEVEL 19 OFFICE GENERAL ARRANGEMENT PLAN Floor Plans - Proposed	12.10.2020
A-P-031-20-01 - LEVEL 20 OFFICE ROOF GARDEN GENERAL ARRANGEMENT PLAN Floor Plans - Proposed	12.10.2020
A-P-031-21-01 - LEVEL 21 OFFICE GENERAL ARRANGEMENT PLAN Floor Plans - Proposed	12.10.2020
A-P-031-22-01 - LEVEL 22 OFFICE GENERAL ARRANGEMENT PLAN Floor Plans - Proposed	12.10.2020
A-P-031-B1-01 - LEVEL B1 BASEMENT GENERAL ARRANGEMENT PLAN Floor Plans - Proposed 02	12.10.2020
A-P-031-B1M-01 - LEVEL B1 MEZZANINE BASEMENT GENERAL ARRANGEMENT PLAN Floor Plans - Proposed 02	12.10.2020
A-P-031-B2-01 - LEVEL B2 BASEMENT GENERAL ARRANGEMENT PLAN Floor Plans - Proposed 02	12.10.2020
A-P-031-B3-01 - LEVEL B3 BASEMENT GENERAL ARRANGEMENT PLAN Floor Plans - Proposed 02	12.10.2020
A-P-031-B4-01 - LEVEL B4 BASEMENT GENERAL ARRANGEMENT PLAN Floor Plans - Proposed 02	12.10.2020
A-P-031-LG-01 - LEVEL LOWER GROUND TOOLEY STREET GENERAL ARRANGMENT PLAN Floor Plans - Proposed 02	12.10.2020
A-P-031-RF-01 - ROOF LEVEL GENERAL ARRANGEMENT PLAN Plans - Proposed	12.10.2020

Reason:

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

2. **Time limit condition**

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.

3. **Pre-commencement condition**

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

Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk)

4. **Pre-commencement condition**

Prior to the commencement of development (excluding demolition to ground level) approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the Local Planning Authority:

1. A preliminary risk assessment which has identified:

- o all previous uses
  - o potential contaminants associated with those uses
  - o a conceptual model of the site indicating sources, pathways and receptors
  - o potentially unacceptable risks arising from contamination at the site.
2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site. 3
3. The results of the site investigation and detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express consent of the Local Planning Authority. The scheme shall be implemented as approved.

Reason: To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution in line with the National Planning Policy Framework (NPPF) (Paragraph 174). The site is located over a Secondary Aquifer and it is understood that the site may be affected by historic contamination.

#### 5. **Pre-commencement condition**

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

Reason: 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. We recommend that where soil contamination is present, a risk assessment is carried out in accordance with our guidance 'Piling into Contaminated Sites'. We will not permit piling activities on parts of a site where an unacceptable risk is posed to controlled waters.

## 6. **Pre-commencement condition**

- a) Prior to the commencement of any development (excluding demolition to ground level), a site investigation and risk assessment shall be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site.
- i) The Phase 1 (desk study, site categorisation; sampling strategy etc.) shall be submitted to the Local Planning Authority for approval before the commencement of any intrusive investigations.
- ii) Any subsequent Phase 2 (site investigation and risk assessment) shall be conducted in accordance with any approved scheme and submitted to the Local Planning Authority for approval prior to the commencement of any remediation that might be required.
- b) In the event that contamination is present, a detailed remediation strategy to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment shall be prepared and submitted to the Local Planning Authority for approval in writing. The scheme shall ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. The approved remediation scheme (if one is required) shall be carried out in accordance with its terms prior to the commencement of development, other than works required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority shall be given two weeks written notification of commencement of the remediation scheme works.
- c) Following the completion of the works and measures identified in the approved remediation strategy, a verification report providing evidence that all works required by the remediation strategy have been completed shall be submitted to and approved in writing by the Local Planning Authority.
- d) In the event that potential contamination is found at any time when carrying out the approved development that was not previously identified, it shall be reported in writing immediately to the Local Planning Authority, and a scheme of investigation and risk assessment, a remediation strategy and verification report (if required) shall be submitted to the Local Planning Authority for approval in writing, in accordance with a-c above.

### Reason

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with The NPPF 2021; and

Policy,P64 - Contaminated Land and Hazardous Substances of the Southwark Plan 2022.

#### 7. **Pre-commencement condition**

No development shall take place (i) demolition (ii) construction, until a Construction Method Statement has been submitted to and approved in writing by the Local Planning Authority in consultation with London Underground. The approved statement shall be adhered to throughout the construction period. The Statement shall provide for:

- a) the parking of vehicles of site operatives and visitors;
- b) loading and unloading of plant and materials;
- c) storage of plant and materials used in constructing the development;
- d) the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
- e) wheel washing facilities;
- f) measures to control the emission of dust and dirt during construction;
- g) a scheme for recycling / disposing of waste resulting from demolition and construction works

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of pollution and nuisance, in accordance with the NPPF 2021; and Policy P56 Protection of Amenity of the Southwark Plan 2022.

#### 8. **Pre-commencement condition**

Prior to works commencing on the sub structure, full details of all proposed tree planting shall be submitted to and approved in writing by the Local Planning Authority. Details will include tree pit cross sections, planting and maintenance specifications and confirmation of location, species, sizes, nursery stock type, supplier and defect period. All tree planting shall be carried out in accordance with those details and at those times. Planting shall comply with BS5837: Trees in relation to demolition, design and construction (2012) and BS: 4428 Code of practice for general landscaping operations.

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

To ensure the proposed development will preserve and enhance the visual amenities of the locality and is designed for the maximum benefit of local biodiversity, in addition to the attenuation of surface water runoff in accordance with the National Planning Policy Framework 2021; Policy G5 - Urban Greening and G7 - Trees and Woodlands of the London Plan 2021; and Policies P13 - Design of Places and P61 - Trees of the Southwark Plan 2022.

**9. Pre-commencement condition**

Prior to the commencement of development (with the exception of demolition works, site clearance, site investigations, excavation and piling , a Vehicle Dynamics Assessment shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Metropolitan Police. The development shall then be implemented in accordance with any approval given.

**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; Policy D11 - Safety Security and Resilience to Emergency of the London Plan 2021; and Policy P16 - Designing out Crime of the Southwark Plan 2022.

**10. Pre-commencement condition**

Prior to the commencement of development (with the exception of demolition works, site clearance and site investigations works), a Blast Mitigation Impact Assessment shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Metropolitan Police. The development shall then be implemented in accordance with any approval given.

**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; Policy D11 - Safety Security and Resilience to Emergency of the London Plan 2021; and Policy P16 - Designing out Crime of the Southwark Plan 2022.



**11. Pre-commencement condition**

Prior to the commencement of development (with the exception of demolition works, site clearance, site investigations, excavation and piling ), details of all proposed Hostile Vehicle Mitigation shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Metropolitan Police. The development shall then be implemented in accordance with any approval given.

**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; Policy D11 - Safety Security and Resilience to Emergency of the London Plan 2021; and Policy P16 - Designing out Crime of the Southwark Plan 2022.

**12. Pre-commencement condition**

Before any work hereby authorised begins, excluding demolition to slab level, 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 the NPPF 2021; Policy HC1 - Heritage Conservation and Growth of the London Plan 2021; and Policy P23 - Archaeology of the Southwark Plan 2022.

**13. Pre-commencement condition**

Before any work hereby authorised begins, including demolition, the applicant shall secure the implementation of a programme of archaeological building recording 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 record buildings of archaeological interest to ensure the preservation of archaeological remains by record in

accordance with the NPPF 2021; Policy HC1 - Heritage Conservation and Growth of the London Plan 2021; and Policy P23 - Archaeology of the Southwark Plan 2022.

**14. Pre-commencement condition**

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

Reason: In order that the details of the programme of works for the archaeological mitigation are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site in accordance with the NPPF 2021; Policy HC1 - Heritage Conservation and Growth of the London Plan 2021; and Policy P23 - Archaeology of the Southwark Plan 2022.

**15. Pre-commencement condition**

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 the NPPF 2021; Policy HC1 - Heritage Conservation and Growth of the London Plan 2021; and Policy P23 - Archaeology of the Southwark Plan 2022.

**16. Pre-commencement condition**

a) Prior to commencement of the development (excluding demolition and site investigation works) hereby permitted, the applicant shall submit to and

receive the Local Planning Authority's approval of a Public Engagement Programme which shall set out:

- 1) How the field work areas will be hoarded to provide opportunities for passers-by to safely view the excavations;
  - 2) Detailed drawings (artwork, design, text and materials, including their location and a full specification of the construction and materials) for the public interpretation and presentation display materials celebrating the historic setting of the site, which will be located on suitably visible public parts of the temporary site hoarding;
  - 3) Details of at least one event, such as a heritage trail, that will be held during the field work phase (as a minimum this should state the date/time, duration, individuals involved and advance promotional measures for the event, and provide an outline of the content of the event);
- b) Prior to the commencement of the fieldwork phase, the hoarding shall be installed in full accordance with the LPA-approved details referred to in parts a.1 and a.2 of the condition, and the hoarding shall remain as such and in place throughout the fieldwork phase.
- c) During the fieldwork phase, the event (referred to in part a.3) shall be carried out. d) Before first occupation of any part of the development, detailed drawings (artwork, design, text and materials, including their location and a full specification of the construction and materials) for the public interpretation and presentation display materials celebrating the historic setting of the site, in some form of permanent display case or signage to be installed within a publicly-accessible part of the development hereby approved. The approved display case or signage shall be installed in accordance with the approval and shall not be replaced other than with a display case or signage of similar specification and bearing the same information.

Reason: To promote the unique setting of the application site and provide information on the special archaeological and historical interest of this part of Southwark, in accordance with the NPPF 2021; Policy HC1 - Heritage Conservation and Growth of the London Plan 2021; and Policy P23 - Archaeology of the Southwark Plan 2022.

#### 17. **Pre-commencement condition**

Secure by design

The development hereby permitted shall incorporate security measures to minimise the risk of crime and to meet the specific security needs of the development in accordance with the principles and objectives of Secured by Design. Details of these measures shall be submitted to and approved in writing by the local planning authority prior to commencement of above grade works

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; Policy D11 - Safety Security and Resilience to Emergency of the London Plan 2021; and Policy P16 - Designing out Crime of the Southwark Plan 2022.

**18. Pre-commencement condition**

A. Prior to demolition of the existing footbridge over Duke Street Hill, full details of the interim (for the construction period) replacement footbridge (including details of access, plans, elevations and details of materials), shall be submitted to and approved in writing by the Local Planning Authority. The interim replacement footbridge will be carried out in accordance with any approval given and retained until such time as the permanent replacement footbridge is ready for use.

B. Prior to construction of the permanent replacement footbridge over Duke Street Hill, full details (including access, plans, elevations and details of materials), shall be submitted to and approved in writing by the Local Planning Authority. The replacement footbridge will be carried out in accordance with any approval given.

Reason: In order that the Local Planning Authority may be satisfied as to the design and details in accordance with the National Planning Policy Framework 2021; Policy D4 - Delivering Good Design of the London Plan 2021; and Policy P14 - Design Quality of the Southwark Plan 2022.

**19. Above grade condition**

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 roof terraces, green walls, planters, base planting, cross sections, surfacing materials of any access, or pathways layouts, materials and edge details), shall be submitted to and approved in writing by the Local Planning Authority. The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use.

The planting, seeding and/or turfing shall be carried out in the first planting season following completion of building works and any trees or shrubs that is found to be dead, dying, severely damaged or diseased within five years of

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

To ensure the proposed development will preserve and enhance the visual amenities of the locality and is designed for the maximum benefit of local biodiversity, in addition to the attenuation of surface water runoff in accordance with the National Planning Policy Framework 2021; Policy G5 - Urban Greening and G7 - Trees and Woodlands of the London Plan 2021; and Policies P13 - Design of Places and P61 - Trees of the Southwark Plan 2022.

**20. Above grade condition**

Before any construction above grade hereby authorised begins, an Ecological 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 Ecological 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 an mandatory criteria of BREEAM (LE5) to monitor long term impact on biodiversity a requirement is to produce a Landscape and Habitat Management Plan

**21. Above grade condition**

Details of Swift bricks (no.18) shall be submitted to and approved in writing by the Local Planning Authority prior to any construction works above grade. No less than three nesting bricks shall be provided and the details shall include the exact location, specification and design of the habitats. The boxes / bricks shall be installed within the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained.

The Swift nesting bricks 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 nest/roost features and mapped locations and Southwark Council agreeing the submitted plans, and once the nest/roost features are installed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the nest/roost features have been installed to the agreed specification.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with the NPPF 2021; Policy G6 - Biodiversity and Access to Nature of the London Plan 2021; and policy P60 - Biodiversity of the Southwark Plan 2022.

**22. Above grade condition**

Prior to above grade construction commencing, material samples/sample-panels/sample-boards of all external facing materials including finish and details of colouration, to be used in the carrying out of this permission shall be presented on site and approved in writing by the Local Planning Authority; the development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order to ensure that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing in accordance with the National Planning Policy Framework 2021; Policy D4 - Delivering Good Design of the London Plan 2021; and Policy P14 - Design Quality of the Southwark Plan 2022.

**23. Above grade condition**

1:5/10 typical section detail-drawings through all buildings facades; parapets; heads, cills and jambs of all openings; entrance lobbies; shop frontages; roof edges; details of typical window openings, terraces, roof gardens, soffits, entrances (inc servicing) and shopfronts to be used in the carrying out of this permission shall be submitted to and approved in writing by the Local Planning Authority before any construction work above grade in connection with this permission is carried out. The scope of details to be submitted to the Local Planning Authority shall be agreed prior to submission. The development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order that the Local Planning Authority may be satisfied as to the design and details in accordance with the National Planning Policy Framework 2021; Policy D4 - Delivering Good Design of the London Plan 2021; and Policy P14 - Design Quality of the Southwark Plan 2022.

**24. Above grade condition**

Full-scale mock-ups of the facades shall be presented on site (or a location agreed with the Local Planning Authority) and approved in writing by the Local Planning Authority before any construction work above grade for the relevant building in connection with this permission is carried out; the development shall not be carried out otherwise than in accordance with any such approval given. The detailed scope of mock up requirements must be agreed with the Local Planning Authority in advance of the mock ups being constructed and presented on site.

Reason:

In order that the Local Planning Authority may be satisfied as to the design and details in accordance with the National Planning Policy Framework 2021; Policy D4 - Delivering Good Design of the London Plan 2021; and Policy P14 - Design Quality of the Southwark Plan 2022.

**25. Above grade condition**

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

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

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

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

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

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with the NPPF 2021; Policy G6 - Biodiversity and Access to Nature of the London Plan 2021; and policy P60 - Biodiversity of the Southwark Plan 2022

**26. Above grade condition**

Before any above grade work hereby authorised begins, details (1:50 scale drawings) of the facilities to be provided for the secure and covered storage of cycles shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the cycle parking facilities provided shall be retained and the space used for no other purpose, and the development shall not be carried out otherwise than 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 - Cycling of the London Plan 2021; and Policy P53 - Cycling of the Southwark Plan 2022.

**27. Above grade condition**

BREEAM

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

(b) Before the first occupation of the building hereby permitted, a certified Post Construction Review (or other verification process agreed with the local planning authority) shall be submitted to and approved in writing by the Local



Planning Authority, confirming that the agreed standards at (a) have been met.

**Reason**

To ensure the proposal complies with The National Planning Policy Framework 2021; Policy SI2 - Minimising Greenhouse Gas Emissions and Policy SI3 Energy Infrastructure of the London Plan 2021; and Policy P69 - Sustainability Standards and Policy P70 - Energy of the Southwark Plan 2022.

, 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.

**28. Pre-Occupation condition**

Prior to occupation of the development, a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a 'long-term monitoring and maintenance plan') for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, if appropriate, and for the reporting of this to the local planning authority. Any long-term monitoring and maintenance plan shall be implemented as approved.

**Reason:** To ensure that the site does not pose any further risk to human health or the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with the National Planning Policy Framework (NPPF) (Paragraph 174).

**29. Pre-Occupation condition**

Any such security measures shall be implemented prior to occupation in accordance with the approved details which shall 'seek to achieve' the secured by design accreditation award from the Metropolitan Police Service.

**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; Policy D11 - Safety Security and Resilience to Emergency of the London Plan 2021; and Policy P16 - Designing out Crime of the Southwark Plan 2022.

30. **Pre-Occupation condition**

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

Reason - The development may lead to low / no water pressures and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid low / no water pressure issues."Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

31. **Pre-Occupation condition**

Before the first occupation of the development, details of showering facilities to be provided for commercial units over 1000 sq.m shall be submitted to and approved in writing by the Local Planning Authority and thereafter the shower facilities shall be retained and the space used for no other purpose.

Reason:

In order to ensure that satisfactory facilities are provided and retained in order to encourage the use of non-car based travel, in accordance with the National Planning Policy Framework (2021); Policy T2 (Healthy streets) of the London Plan (2021); and Policy P53 - Cycling of the Southwark Plan 2022.

32. **Pre-Occupation condition**

Before the first occupation of the development hereby permitted begins, details of the arrangements for the storing of refuse shall be submitted to and approved in writing by the Local Planning Authority.

Thereafter, the approved refuse storage facilities shall be provided and made available for use by the occupiers of the development and the facilities shall thereafter be retained and shall not be used or the space used for any other purpose.

Reason:

To ensure that the refuse will be appropriately stored within the site thereby protecting the amenity of the site and the area in general from litter, odour and potential vermin/pest nuisance in accordance with: the National Planning Policy Framework 2021; SI8 - Waste Capacity and Waste Self Sufficiency of the London Plan 2021; Policy D4 - Design Quality and Policy P62 - Reducing Waste of the Southwark Plan 2022.

**33. Pre-Occupation condition**

The commercial units hereby permitted shall not occupied until a site wide signage strategy detailing the design code for the proposed frontage of the commercial units facing The Cut (including advertisement zones, awnings, and spill-out zones) shall be submitted to and approved in writing by the Local Planning Authority and thereafter implemented in accordance with the approved details.

Reason

In order to ensure that the quality of the design and details are in accordance with the NPPF 2021; Policy D4 Delivering Good Design of the London Plan 2021; and Policy P14 - Design Quality of the Southwark Plan 2022.

**34. Pre-Occupation condition**

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

Reason

In order to ensure that that the ventilation ducting and ancillary equipment will not result in an odour, fume or noise nuisance and will not detract from the appearance of the building in the interests of amenity in accordance with The

National Planning Policy Framework 2021; SI1 - Improving Air Quality of the London Plan 2021; Policy P65 - Improving Air Quality and P14 - Design Quality of the Southwark Plan 2022.

35. **Pre-Occupation condition**

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

Reason: To ensure that occupants have the opportunity to plan a response to flood events which can save them valuable time should an event occur.

36. **Compliance condition**

Whilst the principles and installation of sustainable drainage schemes are to be encouraged, no drainage systems for the infiltration of surface water drainage into the ground are permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

Reason: To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants. This is in line with the National Planning Policy Framework (NPPF) (Paragraph 174). Infiltrating water has the potential to cause remobilization of contaminants present in shallow soil/made ground which could ultimately cause pollution of groundwater.

37. **Compliance condition**

The machinery, plant or equipment installed or operated in connection with the carrying out of this permission shall be so enclosed and/or attenuated that noise does not, at any time, increase the ambient equivalent noise level when the plant, etc., is in use as measured at any adjoining or nearby

premises in separate occupation; or (in the case of any adjoining or nearby residential premises) as measured outside those premises.

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance from plant and machinery in accordance with the National Planning Policy Framework 2021; Policy D14 - Noise of the London Plan 2021; and Policy P14 - Design Quality, and Policy P66 - Reducing Noise Pollution and Enhancing Soundscapes of the Southwark Plan 2022.

**38. Compliance condition**

Other than for maintenance purposes, repair purposes or means of escape, the office terraces shall not be used outside of the following hours:

10:00 - 23:00 daily

Unless otherwise agreed in writing with the Local Planning Authority.

Reason:

To ensure that 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; Policy D14 - Noise of the London Plan 2021; and Policy P14 - Design Quality of the Southwark Plan 2022.

**39. Compliance condition**

Hours of use

The use hereby permitted for cafe/bar restaurant purposes shall not be carried on outside of the hours of:

07:00 - 23:30 on Monday to Saturday and;

08:00 - 23:00 on Sundays and Bank Holidays.

Reason:

To safeguard the amenities of neighbouring residential properties in accordance with the National Planning Policy Framework 2021; Policy D14 - Noise of the London Plan 2021; and Policy P14 - Design Quality, and Policy P66 - Reducing Noise Pollution and Enhancing Soundscapes of the Southwark Plan 2022.

**40. Compliance condition**

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

**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; Policy D14 - Noise of the London Plan 2021; and Policy P14 - Design Quality, Policy P66 - Reducing Noise Pollution and Enhancing Soundscapes of the Southwark Plan 2022.

**41. Compliance condition**

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 unless otherwise agreed in writing by the Local Planning Authority.

**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 National Planning Policy Framework 2021; Policy D4 - Delivering Good Design of the London Plan 2021; and Policy P14 - Design Quality of the Southwark Plan 2022.

**42. Special condition**

**Environment Agency - Further contamination**

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be

implemented as approved, verified and reported to the satisfaction of the Local Planning Authority.

Reason: There is always the potential for unexpected contamination to be identified during development groundworks. We should be consulted should any contamination be identified that could present an unacceptable risk to Controlled Waters.

43. **Special condition**

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 the NPPF 2021; Policy HC1 - Heritage Conservation and Growth of the London Plan 2021; and Policy P23 - Archaeology of the Southwark Plan 2022.

44. **Special condition**

Within 12 months of first occupation, a Whole Life Cycle 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 whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.

Reason

To maximise the reduction in greenhouse gas emissions and to minimise peak and annual energy demand in compliance with the NPPF 2021; Policy SI2 of the London Plan 2021; Policy P69 - Sustainability Standards and policy P70 Energy of the Southwark Plan 2022.

Informative notes to the applicant relating to the proposed development

#### Guidance for works in close proximity to Network Rail's infrastructure

The developer must ensure that their proposal, both during construction and after completion does not:

- o encroach onto Network Rail land
- o affect the safety, operation or integrity of the company's railway and its infrastructure
- o undermine its support zone
- o damage the company's infrastructure
- o place additional load on cuttings
- o adversely affect any railway land or structure
- o over-sail or encroach upon the air-space of any Network Rail land
- o cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future

Network Rail strongly recommend the developer complies with the following comments and requirements to maintain the safe operation of the railway and protect Network Rail's infrastructure.

#### Future maintenance

The development must ensure any future maintenance can be conducted solely on the applicant's land. The applicant must ensure that any construction and subsequent maintenance can be carried out to any proposed buildings or structures without adversely affecting the safety of/or encroaching upon Network Rail's adjacent land and air-space. Therefore, any buildings should be situated at least 2 metres (3m for overhead lines and third rail) from Network Rail's boundary. Network Rail require the 2m (3m for overhead lines and third rail) stand off to allow for construction and future maintenance of a building and without requirement for access to the operational railway environment which may not necessarily be granted or if granted subject to railway site safety requirements and special provisions with all associated railway costs charged to the applicant. Any less than 2m (3m for overhead lines and third rail) and there is a strong possibility that the applicant (and any future resident) will need to utilise Network Rail land and air- space to facilitate works.

The applicant / resident would need to receive approval for such works from the Network Rail Asset Protection Engineer, the applicant / resident would need to submit the request at least 20 weeks before any works were



due to commence on site and they would be liable for all costs (e.g. all possession costs, all site safety costs, all asset protection presence costs).

However, Network Rail is not required to grant permission for any third-party access to its land. No structure/building should be built hard-against Network Rail's boundary as in this case there is an even higher probability of access to Network Rail land being required to undertake any construction / maintenance works. Equally any structure/building erected hard against the boundary with Network Rail will impact adversely upon our maintenance teams' ability to maintain our boundary fencing and boundary treatments.

#### Drainage

Storm/surface water must not be discharged onto Network Rail's property or into Network Rail's culverts or drains except by agreement with Network Rail. Suitable drainage or other works must be provided and maintained by the Developer to prevent surface water flows or run-off onto Network Rail's property. Proper provision must be made to accept and continue drainage discharging from Network Rail's property; full details to be submitted for approval to the Network Rail Asset Protection Engineer. Suitable foul drainage must be provided separate from Network Rail's existing drainage. Soakaways, as a means of storm/surface water disposal must not be constructed within 20 metres of Network Rail's boundary or at any point which could adversely affect the stability of Network Rail's property. After the completion and occupation of the development, any new or exacerbated problems attributable to the new development shall be investigated and remedied at the applicants' expense.

#### Plant & Materials

All operations, including the use of cranes or other mechanical plant working adjacent to Network Rail's property, must at all times be carried out in a "fail safe" manner such that in the event of mishandling, collapse or failure, no plant or materials are capable of falling within 3.0m of the boundary with Network Rail.

#### Scaffolding

Any scaffold which is to be constructed within 10 metres of the railway boundary fence must be erected in such a manner that at no time will any poles over-sail the railway and protective netting around such scaffold must be installed. The applicant/applicant's contractor must consider if they can undertake the works and associated scaffold/access for working at height within the footprint of their property boundary.

#### Piling

Where vibro-compaction/displacement piling plant is to be used in development, details of the use of such machinery and a method

statement should be submitted for the approval of the Network Rail's Asset Protection Engineer prior to the commencement of works and the works shall only be carried out in accordance with the approved method statement.

#### Fencing

In view of the nature of the development, it is essential that the developer provide (at their own expense) and thereafter maintain a substantial, trespass proof fence along the development side of the existing boundary fence, to a minimum height of 1.8 metres. The 1.8m fencing should be adjacent to the railway boundary and the developer/applicant should make provision for its future maintenance and renewal without encroachment upon Network Rail land. Network Rail's existing fencing / wall must not be removed or damaged and at no point either during construction or after works are completed on site should the foundations of the fencing or wall or any embankment therein, be damaged, undermined or compromised in any way. Any vegetation on Network Rail land and within Network Rail's boundary must also not be disturbed. Any fencing installed by the applicant must not prevent Network Rail from maintaining its own fencing/boundary treatment.

#### Lighting

Any lighting associated with the development (including vehicle lights) must not interfere with the sighting of signalling apparatus and/or train drivers vision on approaching trains. The location and colour of lights must not give rise to the potential for confusion with the signalling arrangements on the railway. The developers should obtain Network Rail's Asset Protection Engineer's approval of their detailed proposals regarding lighting.

#### Noise and Vibration

The potential for any noise/vibration impacts caused by the proximity between the proposed development and any existing railway must be assessed in the context of the National Planning Policy Framework which hold relevant national guidance information. The current level of usage may be subject to change at any time without notification including increased frequency of trains, night time train running and heavy freight trains.

#### Vehicle Incursion

Where a proposal calls for hard standing area/parking of vehicles area near the boundary with the operational railway, Network Rail would recommend the installation of a highways approved vehicle incursion barrier or high kerbs to prevent vehicles accidentally driving or rolling onto the railway or damaging lineside fencing.

### Landscaping

Where trees/shrubs are to be planted adjacent to the railway boundary these shrubs should be positioned at a minimum distance greater than their predicted mature height from the boundary. Certain broad leaf deciduous species should not be planted adjacent to the railway boundary as the species will contribute to leaf fall which will have a detrimental effect on the safety and operation of the railway. We would wish to be involved in the approval of any landscaping scheme adjacent to the railway. Where landscaping is proposed as part of an application adjacent to the railway it will be necessary for details of the landscaping to be known and approved to ensure it does not impact upon the railway infrastructure. Any hedge planted adjacent to Network Rail's boundary fencing for screening purposes should be so placed that when fully grown it does not damage the fencing or provide a means of scaling it. No hedge should prevent Network Rail from maintaining its boundary fencing. Lists of trees that are permitted and those that are not permitted are provided below and these should be added to any tree planting conditions:

### Thames Water

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](mailto:developer.services@thameswater.co.uk)



## **Relevant Policies**

### **National Planning Policy Framework**

The revised National Planning Policy Framework ('NPPF') was published on 20 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. Paragraph 218 states that the policies in the Framework are material considerations, which should be taken into account in dealing with applications. The following chapters are relevant:

- Chapter 2 Achieving sustainable development
- Chapter 6 Building a strong, competitive economy
- Chapter 7 Ensuring the vitality of town centres
- Chapter 8 Promoting healthy and safe communities
- Chapter 9 Promoting sustainable transport
- Chapter 11 Making effective use of land
- Chapter 12 Achieving well-designed places
- Chapter 14 Meeting the challenge of climate change, flooding and coastal change
- Chapter 16 Conserving and enhancing the historic environment

### **New London Plan 2021**

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:

- GG1 Building strong and inclusive communities
- GG2 Making the best use of land
- GG3 Creating a healthy city
- GG5 Growing a good economy
- GG6 Increasing efficiency and resilience
- Policy SD1 Opportunity Areas
- Policy SD6 Town centres and high streets
- Policy SD7 Town centres: development principles and Development Plan Documents
- Policy SD8 Town centre network
- Policy SD9 Town centres: Local partnerships and implementation
- 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 D8 Public realm
- Policy D9 Tall buildings
- Policy D10 Basement development

Policy D11 Safety, security and resilience to emergency  
 Policy D12 Fire safety  
 Policy D13 Agent of Change  
 Policy D14 Noise Policy S1 Developing London's social infrastructure  
 Policy S2 Health and social care facilities  
 Policy S6 Public toilets  
 Policy E1 Offices  
 Policy E2 Providing suitable business space  
 Policy E3 Affordable workspace  
 Policy E8 Sector growth opportunities and clusters  
 Policy E9 Retail, markets and hot food takeaways  
 Policy E10 Visitor infrastructure  
 Policy E11 Skills and opportunities for all  
 Policy HC1 Heritage conservation and growth  
 Policy HC2 World Heritage Sites  
 Policy HC3 Strategic and Local Views  
 Policy HC4 London View Management Framework  
 Policy HC5 Supporting London's culture and creative industries  
 Policy HC6 Supporting the night-time economy  
 Policy G1 Green infrastructure  
 Policy G5 Urban greening  
 Policy G6 Biodiversity and access to nature  
 Policy G7 Trees and woodlands  
 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 8 Waste capacity and net waste self-sufficiency  
 Policy SI 12 Flood risk management  
 Policy SI 13 Sustainable drainage  
 Policy T1 Strategic approach to transport  
 Policy T2 Healthy Streets  
 Policy T3 Transport capacity, connectivity and safeguarding  
 Policy T4 Assessing and mitigating transport impacts  
 Policy T5 Cycling  
 Policy T6 Car parking  
 Policy T6.2 Office parking  
 Policy T6.3 Retail parking  
 Policy T6.5 Non-residential disabled persons parking  
 Policy T7 Deliveries, servicing and construction  
 Policy T9 Funding transport infrastructure through planning

### Southwark Plan 2022

ST1 Southwark's Development targets  
 ST2 Southwark's Places

SP2 Southwark Together  
 SP3 Great start in life  
 SP4 Green and inclusive economy  
 SP5 Thriving neighbourhoods and tackling health equalities  
 SP6 Climate Change  
 P13 Design of places  
 P14 Design quality  
 P16 Designing out crime  
 P17 Tall buildings  
 P18 Efficient use of land  
 P20 Conservation areas  
 P21 Conservation of the historic environment and natural heritage  
 P22 Borough views  
 P23 Archaeology  
 P28 Access to employment and training  
 P30 Office and business development  
 P31 Affordable workspace  
 P35 Town and local centres  
 P44 Broadband and digital infrastructure  
 P45 Healthy developments  
 P47 Community uses  
 P49 Public transport  
 P50 Highways impacts  
 P51 Walking  
 P53 Cycling  
 P54 Car Parking  
 P55 Parking standards for disabled people and the mobility impaired  
 P56 Protection of amenity  
 P57 Open space  
 P59 Green infrastructure  
 P60 Biodiversity  
 P61 Trees  
 P62 Reducing waste  
 P64 Contaminated land and hazardous substances  
 P65 Improving air quality  
 P66 Reducing noise pollution and enhancing soundscapes  
 P67 Reducing water use  
 P68 Reducing flood risk  
 P69 Sustainability standards  
 P70 Energy  
 NSP55

#### Mayors SPD/SPGs

Accessible London: Achieving an Inclusive Environment (October 2014)  
 The control of dust and emissions during construction and demolition (July 2014)  
 Town Centres (July 2014)  
 Character and Context (June 2014)  
 Sustainable Design and Construction (April 2014)  
 Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy (April 2013)

London View Management Framework (March 2012)  
Planning for Equality and Diversity in London (October 2007)

Southwark SPDs/SPGs

Design and Access Statements (2007)  
S106 and CIL (2015) S106 and CIL Addendum (2017)  
Sustainability Assessments (2007)  
Sustainable Design and Construction (2009)  
Sustainable Transport (2009)



**Planning History****Relevant Planning History**

No relevant planning history

## Consultation undertaken and received

### Consultation Undertaken

#### Notices:

Site • Date Notice • Expiry Date of Notice: 28.10.2021

Notice was displayed:  
e: 30.09.2021

Press • Date Notice • Expiry Date of Notice: 07.11.2021

Notice was published:  
e: 30.09.2021

#### Consultation Letters to Neighbours and Local Groups:

Recipient Address:

Date Letter Sent:

- Flat 5, Minerva House, Montague Close
- Flat 5, Minerva House, Montague Close
- Flat 5, Minerva House, Montague Close
- Basement, 10 Borough High Street, London
- Basement, 10 Borough High Street, London
- Basement, 10 Borough High Street, London
- Fourth Floor And Fifth Floor, Minerva House, Montague Close
- Fourth Floor And Fifth Floor, Minerva House, Montague Close
- Fourth Floor And Fifth Floor, Minerva House, Montague Close
- Part Sixth Floor East Wing, Cottons Centre, Hays Lane
- Part Sixth Floor East Wing, Cottons Centre, Hays Lane
- Part Sixth Floor East Wing, Cottons Centre, Hays Lane
- Flat 12, Minerva House, Montague Close
- Flat 12, Minerva House, Montague Close
- Flat 12, Minerva House, Montague Close
- 2 London Bridge Walk, London, Southwark
- 2 London Bridge Walk, London, Southwark

16.11.2020 and  
29.09.2021

- 2 London Bridge Walk, London, Southwark
- 23 Duke Street Hill, London, Southwark
- 23 Duke Street Hill, London, Southwark
- 23 Duke Street Hill, London, Southwark
- 17 Duke Street Hill, London, Southwark
- 17 Duke Street Hill, London, Southwark
- 17 Duke Street Hill, London, Southwark
- Refectory, Southwark Cathedral, Montague Close
- Refectory, Southwark Cathedral, Montague Close
- Refectory, Southwark Cathedral, Montague Close
- Flat 2, Minerva House, Montague Close
- Flat 2, Minerva House, Montague Close
- Flat 2, Minerva House, Montague Close
- 2 Bridge Arcade, Green Dragon Court, London
- 2 Bridge Arcade, Green Dragon Court, London
- 2 Bridge Arcade, Green Dragon Court, London
- Part Third Floor Front Small, Cottons Centre, Hays Lane
- Part Third Floor Front Small, Cottons Centre, Hays Lane
- Part Third Floor Front Small, Cottons Centre, Hays Lane
- Suite 509, 6 Hays Lane, London
- Suite 509, 6 Hays Lane, London
- Suite 509, 6 Hays Lane, London
- Suite 210, 6 Hays Lane, London
- Suite 210, 6 Hays Lane, London
- Suite 210, 6 Hays Lane, London
- Railway Arches 2D And 2E, Montague Close, London
- Railway Arches 2D And 2E, Montague Close, London
- Railway Arches 2D And 2E, Montague Close, London
- 7 Borough High Street, London, Southwark
- 7 Borough High Street, London, Southwark
- 7 Borough High Street, London, Southwark
- Intelligent Financial Systems Ltd, 1 London Bridge, London
- Intelligent Financial Systems Ltd, 1 London Bridge, London
- Intelligent Financial Systems Ltd, 1 London Bridge, London
- Quarter Bar And Lounge, 8-18 London Bridge Street,  
London
- Quarter Bar And Lounge, 8-18 London Bridge Street,  
London
- Quarter Bar And Lounge, 8-18 London Bridge Street,  
London
- Second Floor, 6-10 Borough High Street, London
- Second Floor, 6-10 Borough High Street, London
- Second Floor, 6-10 Borough High Street, London
- 47-49 Tooley Street, London, Southwark
- 47-49 Tooley Street, London, Southwark
- 47-49 Tooley Street, London, Southwark

- Emblem House, 17-25 Tooley Street, London
- Emblem House, 17-25 Tooley Street, London
- Emblem House, 17-25 Tooley Street, London
- First Floor East, Cottons Centre, Cottons Lane
- First Floor East, Cottons Centre, Cottons Lane
- First Floor East, Cottons Centre, Cottons Lane
- Ground Floor, 10 Borough High Street, London
- Ground Floor, 10 Borough High Street, London
- Ground Floor, 10 Borough High Street, London
- 19A Borough High Street, London, Southwark
- 19A Borough High Street, London, Southwark
- 19A Borough High Street, London, Southwark
- 3 London Bridge Walk, London, Southwark
- 3 London Bridge Walk, London, Southwark
- 3 London Bridge Walk, London, Southwark
- Flat 13, 4-6 London Bridge Street, London
- Flat 13, 4-6 London Bridge Street, London
- Flat 13, 4-6 London Bridge Street, London
- 4 Hays Lane, London, Southwark
- 4 Hays Lane, London, Southwark
- 4 Hays Lane, London, Southwark
- Ground Floor Rear West, Bridge House, 4 Borough High Street
- Ground Floor Rear West, Bridge House, 4 Borough High Street
- Ground Floor Rear West, Bridge House, 4 Borough High Street
- Suite 309, 6 Hays Lane, London
- Suite 309, 6 Hays Lane, London
- Suite 309, 6 Hays Lane, London
- Suite 310 To 313, 6 Hays Lane, London
- Suite 310 To 313, 6 Hays Lane, London
- Suite 310 To 313, 6 Hays Lane, London
- Suite 204 To 206, 6 Hays Lane, London
- Suite 204 To 206, 6 Hays Lane, London
- Suite 204 To 206, 6 Hays Lane, London
- 2 Railway Approach, London, Southwark
- 2 Railway Approach, London, Southwark
- 2 Railway Approach, London, Southwark
- Ground And First Floor East, 1 London Bridge, London
- Ground And First Floor East, 1 London Bridge, London
- Ground And First Floor East, 1 London Bridge, London
- Flat 9, 4-6 London Bridge Street, London
- Flat 9, 4-6 London Bridge Street, London
- Flat 9, 4-6 London Bridge Street, London
- Kiosk, London Bridge Walk, London

- Kiosk, London Bridge Walk, London
- Kiosk, London Bridge Walk, London
- Fifth Floor West, 1 London Bridge, London
- Fifth Floor West, 1 London Bridge, London
- Fifth Floor West, 1 London Bridge, London
- Suite 502, 6 Hays Lane, London
- Suite 502, 6 Hays Lane, London
- Suite 502, 6 Hays Lane, London
- Office B Third Floor, 2 London Bridge, London
- Office B Third Floor, 2 London Bridge, London
- Office B Third Floor, 2 London Bridge, London
- Fourth Floor, 4-6 London Bridge Street, London
- Fourth Floor, 4-6 London Bridge Street, London
- Fourth Floor, 4-6 London Bridge Street, London
- 9A Borough High Street, London, Southwark
- 9A Borough High Street, London, Southwark
- 9A Borough High Street, London, Southwark
- Ground Floor Front, 4 Borough High Street, London
- Ground Floor Front, 4 Borough High Street, London
- Ground Floor Front, 4 Borough High Street, London
- Flat 6, Minerva House, Montague Close
- Flat 6, Minerva House, Montague Close
- Flat 6, Minerva House, Montague Close
- 6 Tooley Street, London, Southwark
- 6 Tooley Street, London, Southwark
- 6 Tooley Street, London, Southwark
- 26 Car Spaces, Cottons Centre, Cottons Lane
- 26 Car Spaces, Cottons Centre, Cottons Lane
- 26 Car Spaces, Cottons Centre, Cottons Lane
- Suite 211, 6 Hays Lane, London
- Suite 211, 6 Hays Lane, London
- Suite 211, 6 Hays Lane, London
- Suite Cinnamon, 6 Hays Lane, London
- Suite Cinnamon, 6 Hays Lane, London
- Suite Cinnamon, 6 Hays Lane, London
- Jamie's Bar And Dining, 8-18 London Bridge Street,  
London
- Jamie's Bar And Dining, 8-18 London Bridge Street,  
London
- Jamie's Bar And Dining, 8-18 London Bridge Street,  
London
- Office B Fourth Floor, 2 London Bridge, London
- Office B Fourth Floor, 2 London Bridge, London
- Office B Fourth Floor, 2 London Bridge, London
- Office C Second Floor, 2 London Bridge, London
- Office C Second Floor, 2 London Bridge, London

- Office C Second Floor, 2 London Bridge, London
- 11 Borough High Street, London, Southwark
- 11 Borough High Street, London, Southwark
- 11 Borough High Street, London, Southwark
- 3 London Bridge Street, London, Southwark
- 3 London Bridge Street, London, Southwark
- 3 London Bridge Street, London, Southwark
- 2 London Bridge, London, Southwark
- 2 London Bridge, London, Southwark
- 2 London Bridge, London, Southwark
- Part First Floor, 6-8 Borough High Street, London
- Part First Floor, 6-8 Borough High Street, London
- Part First Floor, 6-8 Borough High Street, London
- Flat 20, 4-6 London Bridge Street, London
- Flat 20, 4-6 London Bridge Street, London
- Flat 20, 4-6 London Bridge Street, London
- Flat 11, 4-6 London Bridge Street, London
- Flat 11, 4-6 London Bridge Street, London
- Flat 11, 4-6 London Bridge Street, London
- Flat 5, 4-6 London Bridge Street, London
- Flat 5, 4-6 London Bridge Street, London
- Flat 5, 4-6 London Bridge Street, London
- Suite 202, 6 Hays Lane, London
- Suite 202, 6 Hays Lane, London
- Suite 202, 6 Hays Lane, London
- First Floor Rear, 4 Borough High Street, London
- First Floor Rear, 4 Borough High Street, London
- First Floor Rear, 4 Borough High Street, London
- Seventh Floor, Cottons Centre, Hays Lane
- Seventh Floor, Cottons Centre, Hays Lane
- Seventh Floor, Cottons Centre, Hays Lane
- Part Fourth Floor Small, Cottons Centre, Hays Lane
- Part Fourth Floor Small, Cottons Centre, Hays Lane
- Part Fourth Floor Small, Cottons Centre, Hays Lane
- Part Sixth Floor, Cottons Centre, Hays Lane
- Part Sixth Floor, Cottons Centre, Hays Lane
- Part Sixth Floor, Cottons Centre, Hays Lane
- Flat 10, Minerva House, Montague Close
- Flat 10, Minerva House, Montague Close
- Flat 10, Minerva House, Montague Close
- Flat 21, 4-6 London Bridge Street, London
- Flat 21, 4-6 London Bridge Street, London
- Flat 21, 4-6 London Bridge Street, London
- Flat 18, 4-6 London Bridge Street, London
- Flat 18, 4-6 London Bridge Street, London
- Flat 18, 4-6 London Bridge Street, London

- Flat 12, 4-6 London Bridge Street, London
- Flat 12, 4-6 London Bridge Street, London
- Flat 12, 4-6 London Bridge Street, London
- Flat 1, 4-6 London Bridge Street, London
- Flat 1, 4-6 London Bridge Street, London
- Flat 1, 4-6 London Bridge Street, London
- Basement, 6-10 Borough High Street, London
- Basement, 6-10 Borough High Street, London
- Basement, 6-10 Borough High Street, London
- Cottons Gym, Cottons Centre, Cottons Lane
- Cottons Gym, Cottons Centre, Cottons Lane
- Cottons Gym, Cottons Centre, Cottons Lane
- Suite 411, 6 Hays Lane, London
- Suite 411, 6 Hays Lane, London
- Suite 411, 6 Hays Lane, London
- Second Floor East, 1 London Bridge, London
- Second Floor East, 1 London Bridge, London
- Second Floor East, 1 London Bridge, London
- Second Floor, Cottons Centre, Cottons Lane
- Second Floor, Cottons Centre, Cottons Lane
- Second Floor, Cottons Centre, Cottons Lane
- Office B Second Floor, 2 London Bridge, London
- Office B Second Floor, 2 London Bridge, London
- Office B Second Floor, 2 London Bridge, London
- Flat 2, 4-6 London Bridge Street, London
- Flat 2, 4-6 London Bridge Street, London
- Flat 2, 4-6 London Bridge Street, London
- Part Ground Floor South, Cottons Centre, Hays Lane
- Part Ground Floor South, Cottons Centre, Hays Lane
- Part Ground Floor South, Cottons Centre, Hays Lane
- Arches 971 To 972, 19 Duke Street Hill, London
- Arches 971 To 972, 19 Duke Street Hill, London
- Arches 971 To 972, 19 Duke Street Hill, London
- Car Space 1, 1 London Bridge, London
- Car Space 1, 1 London Bridge, London
- Car Space 1, 1 London Bridge, London
- Gift Shop, Southwark Cathedral, Montague Close
- Gift Shop, Southwark Cathedral, Montague Close
- Gift Shop, Southwark Cathedral, Montague Close
- Part First Floor And Part Second Floor, 6-8 Borough High Street, London
  - Part First Floor And Part Second Floor, 6-8 Borough High Street, London
  - Part First Floor And Part Second Floor, 6-8 Borough High Street, London
- Part Basement St Martins, Cottons Centre, Hays Lane

- Part Basement St Martins, Cottons Centre, Hays Lane
- Part Basement St Martins, Cottons Centre, Hays Lane
- Fifth Floor, 8 Montague Close, London
- Fifth Floor, 8 Montague Close, London
- Fifth Floor, 8 Montague Close, London
- Strategic Insight, 1 London Bridge, London
- Strategic Insight, 1 London Bridge, London
- Strategic Insight, 1 London Bridge, London
- Cottons Gym, Cottons Centre, Hays Lane
- Cottons Gym, Cottons Centre, Hays Lane
- Cottons Gym, Cottons Centre, Hays Lane
- Suite 207, 6 Hays Lane, London
- Suite 207, 6 Hays Lane, London
- Suite 207, 6 Hays Lane, London
- Flat 14, 4-6 London Bridge Street, London
- Flat 14, 4-6 London Bridge Street, London
- Flat 14, 4-6 London Bridge Street, London
- 10 Montague Close, London, Southwark
- 10 Montague Close, London, Southwark
- 10 Montague Close, London, Southwark
- Suite 102, 6 Hays Lane, London
- Suite 102, 6 Hays Lane, London
- Suite 102, 6 Hays Lane, London
- Part Fourth Floor And Part Fifth Floor, Cottons Centre, Hays Lane
- Part Fourth Floor And Part Fifth Floor, Cottons Centre, Hays Lane
- Part Fourth Floor And Part Fifth Floor, Cottons Centre, Hays Lane
- Part Third Floor, 6-8 Borough High Street, London
- Part Third Floor, 6-8 Borough High Street, London
- Part Third Floor, 6-8 Borough High Street, London
- Flat 9, Minerva House, Montague Close
- Flat 9, Minerva House, Montague Close
- Flat 9, Minerva House, Montague Close
- Second Floor, Montague Chambers, Montague Close
- Second Floor, Montague Chambers, Montague Close
- Second Floor, Montague Chambers, Montague Close
- Flat 1, Minerva House, Montague Close
- Flat 1, Minerva House, Montague Close
- Flat 1, Minerva House, Montague Close
- Third Floor East, 1 London Bridge, London
- Third Floor East, 1 London Bridge, London
- Third Floor East, 1 London Bridge, London
- Fourth Floor, 3 London Bridge Street, London
- Fourth Floor, 3 London Bridge Street, London



- Fourth Floor, 3 London Bridge Street, London
- Ground Floor Rear East, Bridge House, 4 Borough High Street
- Ground Floor Rear East, Bridge House, 4 Borough High Street
- Ground Floor Rear East, Bridge House, 4 Borough High Street
- Suite 307, 6 Hays Lane, London
- Suite 307, 6 Hays Lane, London
- Suite 307, 6 Hays Lane, London
- E2x Limited, 1 London Bridge, London
- E2x Limited, 1 London Bridge, London
- E2x Limited, 1 London Bridge, London
- Suite 314, 6 Hays Lane, London
- Suite 314, 6 Hays Lane, London
- Suite 314, 6 Hays Lane, London
- Part Ground Floor, Cottons Centre, Cottons Lane
- Part Ground Floor, Cottons Centre, Cottons Lane
- Part Ground Floor, Cottons Centre, Cottons Lane
- 1 London Bridge Street, London, Southwark
- 1 London Bridge Street, London, Southwark
- 1 London Bridge Street, London, Southwark
- Conference Rooms, Southwark Cathedral, Montague Close
- Conference Rooms, Southwark Cathedral, Montague Close
- Conference Rooms, Southwark Cathedral, Montague Close
- Twelfth Floor West, 1 London Bridge, London
- Twelfth Floor West, 1 London Bridge, London
- Twelfth Floor West, 1 London Bridge, London
- Third Floor And Fourth Floor, 4 Borough High Street, London
- Third Floor And Fourth Floor, 4 Borough High Street, London
- Third Floor And Fourth Floor, 4 Borough High Street, London
- London Bridge Underground Station, 21 Duke Street Hill, London
- London Bridge Underground Station, 21 Duke Street Hill, London
- London Bridge Underground Station, 21 Duke Street Hill, London
- Suite Coriander, 6 Hays Lane, London
- Suite Coriander, 6 Hays Lane, London
- Suite Coriander, 6 Hays Lane, London

- Suite 302, 6 Hays Lane, London
- Suite 302, 6 Hays Lane, London
- Suite 302, 6 Hays Lane, London
- Suite 504, 6 Hays Lane, London
- Suite 504, 6 Hays Lane, London
- Suite 504, 6 Hays Lane, London
- Suite Basil, 6 Hays Lane, London
- Suite Basil, 6 Hays Lane, London
- Suite Basil, 6 Hays Lane, London
- Suite 104, 6 Hays Lane, London
- Suite 104, 6 Hays Lane, London
- Suite 104, 6 Hays Lane, London
- Sixth And Seventh Floors East, 1 London Bridge, London
- Sixth And Seventh Floors East, 1 London Bridge, London
- Sixth And Seventh Floors East, 1 London Bridge, London
- Flat 7, 4-6 London Bridge Street, London
- Flat 7, 4-6 London Bridge Street, London
- Flat 7, 4-6 London Bridge Street, London
- Office A1 Third Floor, 2 London Bridge, London
- Office A1 Third Floor, 2 London Bridge, London
- Office A1 Third Floor, 2 London Bridge, London
- 15 Borough High Street, London, Southwark
- 15 Borough High Street, London, Southwark
- 15 Borough High Street, London, Southwark
- Part Sixth Floor And Seventh Floor, Cottons Centre, Hays Lane
- Part Sixth Floor And Seventh Floor, Cottons Centre, Hays Lane
- Part Sixth Floor And Seventh Floor, Cottons Centre, Hays Lane
- First Floor Front, 4 Borough High Street, London
- First Floor Front, 4 Borough High Street, London
- First Floor Front, 4 Borough High Street, London
- Third Floor, 6-10 Borough High Street, London
- Third Floor, 6-10 Borough High Street, London
- Third Floor, 6-10 Borough High Street, London
- Suite 213, 6 Hays Lane, London
- Suite 213, 6 Hays Lane, London
- Suite 213, 6 Hays Lane, London
- Flat 6, 4-6 London Bridge Street, London
- Flat 6, 4-6 London Bridge Street, London
- Flat 6, 4-6 London Bridge Street, London
- Part Ground Floor North, Cottons Centre, Hays Lane
- Part Ground Floor North, Cottons Centre, Hays Lane
- Part Ground Floor North, Cottons Centre, Hays Lane
- 1-3 Tooley Street, London, Southwark

- 1-3 Tooley Street, London, Southwark
- 1-3 Tooley Street, London, Southwark
- Part Third Floor Rear Small, Cottons Centre, Hays Lane
- Part Third Floor Rear Small, Cottons Centre, Hays Lane
- Part Third Floor Rear Small, Cottons Centre, Hays Lane
- Suite 508, 6 Hays Lane, London
- Suite 508, 6 Hays Lane, London
- Suite 508, 6 Hays Lane, London
- Suite 103, 6 Hays Lane, London
- Suite 103, 6 Hays Lane, London
- Suite 103, 6 Hays Lane, London
- Units 1 And 2 Lower Level Walkway, Cottons Centre,  
Cottons Lane
  - Units 1 And 2 Lower Level Walkway, Cottons Centre,  
Cottons Lane
  - Units 1 And 2 Lower Level Walkway, Cottons Centre,  
Cottons Lane
- Part Basement, Cottons Centre, Cottons Lane
- Part Basement, Cottons Centre, Cottons Lane
- Part Basement, Cottons Centre, Cottons Lane
- Office A Second Floor, 2 London Bridge, London
- Office A Second Floor, 2 London Bridge, London
- Office A Second Floor, 2 London Bridge, London
- Flat 3, 4-6 London Bridge Street, London
- Flat 3, 4-6 London Bridge Street, London
- Flat 3, 4-6 London Bridge Street, London
- Ground Floor North, Cottons Centre, Cottons Lane
- Ground Floor North, Cottons Centre, Cottons Lane
- Ground Floor North, Cottons Centre, Cottons Lane
- Second Floor West, 1 London Bridge, London
- Second Floor West, 1 London Bridge, London
- Second Floor West, 1 London Bridge, London
- 43 Railway Approach, London, Southwark
- 43 Railway Approach, London, Southwark
- 43 Railway Approach, London, Southwark
- Creams Cafe, 4 Tooley Street, London
- Creams Cafe, 4 Tooley Street, London
- Creams Cafe, 4 Tooley Street, London
- 14 Borough High Street, London, Southwark
- 14 Borough High Street, London, Southwark
- 14 Borough High Street, London, Southwark
- 20-26 London Bridge Street, London, Southwark
- 20-26 London Bridge Street, London, Southwark
- 20-26 London Bridge Street, London, Southwark
- 7 London Bridge Walk, London, Southwark
- 7 London Bridge Walk, London, Southwark

- 7 London Bridge Walk, London, Southwark
- Flat 16, 4-6 London Bridge Street, London
- Flat 16, 4-6 London Bridge Street, London
- Flat 16, 4-6 London Bridge Street, London
- Flat 8, 4-6 London Bridge Street, London
- Flat 8, 4-6 London Bridge Street, London
- Flat 8, 4-6 London Bridge Street, London
- Part First Floor And Second Floor, 11 Borough High Street, London
  - Part First Floor And Second Floor, 11 Borough High Street, London
  - Part First Floor And Second Floor, 11 Borough High Street, London
- Flat 22, 4-6 London Bridge Street, London
- Flat 22, 4-6 London Bridge Street, London
- Flat 22, 4-6 London Bridge Street, London
- Suite 506, 6 Hays Lane, London
- Suite 506, 6 Hays Lane, London
- Suite 506, 6 Hays Lane, London
- Suite 501, 6 Hays Lane, London
- Suite 501, 6 Hays Lane, London
- Suite 501, 6 Hays Lane, London
- Suite 409, 6 Hays Lane, London
- Suite 409, 6 Hays Lane, London
- Suite 409, 6 Hays Lane, London
- Suite 208, 6 Hays Lane, London
- Suite 208, 6 Hays Lane, London
- Suite 208, 6 Hays Lane, London
- Suite 201, 6 Hays Lane, London
- Suite 201, 6 Hays Lane, London
- Suite 201, 6 Hays Lane, London
- Suite 101, 6 Hays Lane, London
- Suite 101, 6 Hays Lane, London
- Suite 101, 6 Hays Lane, London
- 5 London Bridge Street, London, Southwark
- 5 London Bridge Street, London, Southwark
- 5 London Bridge Street, London, Southwark
- Part Basement Part Ground Floor And Second Floor, Cottons Centre, Hays Lane
  - Part Basement Part Ground Floor And Second Floor, Cottons Centre, Hays Lane
  - Part Basement Part Ground Floor And Second Floor, Cottons Centre, Hays Lane
- Third Floor, Minerva House, Montague Close
- Third Floor, Minerva House, Montague Close
- Third Floor, Minerva House, Montague Close

- London Bridge Confectioner, 19 Duke Street Hill, London
- London Bridge Confectioner, 19 Duke Street Hill, London
- London Bridge Confectioner, 19 Duke Street Hill, London
- Sixth Floor, Cottons Centre, Hays Lane
- Sixth Floor, Cottons Centre, Hays Lane
- Sixth Floor, Cottons Centre, Hays Lane
- Destination Health, 8 London Bridge Street, London
- Destination Health, 8 London Bridge Street, London
- Destination Health, 8 London Bridge Street, London
- 6 London Bridge Walk, London, Southwark
- 6 London Bridge Walk, London, Southwark
- 6 London Bridge Walk, London, Southwark
- 35 Tooley Street, London, Southwark
- 35 Tooley Street, London, Southwark
- 35 Tooley Street, London, Southwark
- First Floor, Colechurch House, 1 London Bridge Walk
- First Floor, Colechurch House, 1 London Bridge Walk
- First Floor, Colechurch House, 1 London Bridge Walk
- E D And F Man, 3 London Bridge Street, London
- E D And F Man, 3 London Bridge Street, London
- E D And F Man, 3 London Bridge Street, London
- Basement And Part Ground Floor, 4 Tooley Street, London
- Basement And Part Ground Floor, 4 Tooley Street, London
- Basement And Part Ground Floor, 4 Tooley Street, London
- Fourth Floor, Colechurch House, 1 London Bridge Walk
- Fourth Floor, Colechurch House, 1 London Bridge Walk
- Fourth Floor, Colechurch House, 1 London Bridge Walk
- Third Floor, 11 Borough High Street, London
- Third Floor, 11 Borough High Street, London
- Third Floor, 11 Borough High Street, London
- Denmark House, 15 Tooley Street, London
- Denmark House, 15 Tooley Street, London
- Denmark House, 15 Tooley Street, London
- Suite 408, 6 Hays Lane, London
- Suite 408, 6 Hays Lane, London
- Suite 408, 6 Hays Lane, London
- Medicare First Ltd, 2 London Bridge, London
- Medicare First Ltd, 2 London Bridge, London
- Medicare First Ltd, 2 London Bridge, London
- Railway Arch 2F, Montague Close, London
- Railway Arch 2F, Montague Close, London
- Railway Arch 2F, Montague Close, London
- Second Floor, 8-10 Borough High Street, London
- Second Floor, 8-10 Borough High Street, London
- Second Floor, 8-10 Borough High Street, London
- 5 London Bridge Walk, London, Southwark

- 5 London Bridge Walk, London, Southwark
  - 5 London Bridge Walk, London, Southwark
  - Basement And Third Floor, Colechurch House, London
- Bridge Walk
- Basement And Third Floor, Colechurch House, London
- Bridge Walk
- Basement And Third Floor, Colechurch House, London
- Bridge Walk
- Flat 8, Minerva House, Montague Close
  - Flat 8, Minerva House, Montague Close
  - Flat 8, Minerva House, Montague Close
  - 34 Railway Approach, London, Southwark
  - 34 Railway Approach, London, Southwark
  - 34 Railway Approach, London, Southwark
  - 9 London Bridge Walk, London, Southwark
  - 9 London Bridge Walk, London, Southwark
  - 9 London Bridge Walk, London, Southwark
  - 1 Duke Street Hill, London, Southwark
  - 1 Duke Street Hill, London, Southwark
  - 1 Duke Street Hill, London, Southwark
  - 8 London Bridge Walk, London, Southwark
  - 8 London Bridge Walk, London, Southwark
  - 8 London Bridge Walk, London, Southwark
  - 4-5 London Bridge Walk, London, Southwark
  - 4-5 London Bridge Walk, London, Southwark
  - 4-5 London Bridge Walk, London, Southwark
  - Flat 15, 4-6 London Bridge Street, London
  - Flat 15, 4-6 London Bridge Street, London
  - Flat 15, 4-6 London Bridge Street, London
  - Flat 4, 4-6 London Bridge Street, London
  - Flat 4, 4-6 London Bridge Street, London
  - Flat 4, 4-6 London Bridge Street, London
  - Flat 10, 4-6 London Bridge Street, London
  - Flat 10, 4-6 London Bridge Street, London
  - Flat 10, 4-6 London Bridge Street, London
  - Suite 209, 6 Hays Lane, London
  - Suite 209, 6 Hays Lane, London
  - Suite 209, 6 Hays Lane, London
  - Suite 401, 6 Hays Lane, London
  - Suite 401, 6 Hays Lane, London
  - Suite 401, 6 Hays Lane, London
  - Suite 308, 6 Hays Lane, London
  - Suite 308, 6 Hays Lane, London
  - Suite 308, 6 Hays Lane, London
  - Suite 303, 6 Hays Lane, London
  - Suite 303, 6 Hays Lane, London

- Suite 303, 6 Hays Lane, London
- Suite 403 To 407, 6 Hays Lane, London
- Suite 403 To 407, 6 Hays Lane, London
- Suite 403 To 407, 6 Hays Lane, London
- Fourth And Fifth Floors East, 1 London Bridge, London
- Fourth And Fifth Floors East, 1 London Bridge, London
- Fourth And Fifth Floors East, 1 London Bridge, London
- Ground Floor, 2 London Bridge, London
- Ground Floor, 2 London Bridge, London
- Ground Floor, 2 London Bridge, London
- Part Ground Floor, 21 Borough High Street, London
- Part Ground Floor, 21 Borough High Street, London
- Part Ground Floor, 21 Borough High Street, London
- Southwark Cathedral, Montague Close, London
- Southwark Cathedral, Montague Close, London
- Southwark Cathedral, Montague Close, London
- Part Fifth Floor Control Risks Group, Cottons Centre, Hays Lane
- Part Fifth Floor Control Risks Group, Cottons Centre, Hays Lane
- Part Fifth Floor Control Risks Group, Cottons Centre, Hays Lane
- Units 1 And 2 Lower Level Walkway, Cottons Centre, Hays Lane
- Units 1 And 2 Lower Level Walkway, Cottons Centre, Hays Lane
- Units 1 And 2 Lower Level Walkway, Cottons Centre, Hays Lane
- 8-18 London Bridge Street, London, Southwark
- 8-18 London Bridge Street, London, Southwark
- 8-18 London Bridge Street, London, Southwark
- Barrowboy And Banker, 6-8 Borough High Street, London
- Barrowboy And Banker, 6-8 Borough High Street, London
- Barrowboy And Banker, 6-8 Borough High Street, London
- London Bridge Hospital, 27-33 Tooley Street, London
- London Bridge Hospital, 27-33 Tooley Street, London
- London Bridge Hospital, 27-33 Tooley Street, London
- Sub Basement And Basement And Ground Floor, 4-6 London Bridge Street, London
- Sub Basement And Basement And Ground Floor, 4-6 London Bridge Street, London
- Sub Basement And Basement And Ground Floor, 4-6 London Bridge Street, London
- Eighth Floor East, 1 London Bridge, London
- Eighth Floor East, 1 London Bridge, London
- Eighth Floor East, 1 London Bridge, London

- Third Floor, Colechurch House, 1 London Bridge Walk
- Third Floor, Colechurch House, 1 London Bridge Walk
- Third Floor, Colechurch House, 1 London Bridge Walk
- Unit C, 2 London Bridge, London
- Unit C, 2 London Bridge, London
- Unit C, 2 London Bridge, London
- Suite 304 To 306, 6 Hays Lane, London
- Suite 304 To 306, 6 Hays Lane, London
- Suite 304 To 306, 6 Hays Lane, London
- Suite 505, 6 Hays Lane, London
- Suite 505, 6 Hays Lane, London
- Suite 505, 6 Hays Lane, London
- Suite 410, 6 Hays Lane, London
- Suite 410, 6 Hays Lane, London
- Suite 410, 6 Hays Lane, London
- Office A2 Third Floor, 2 London Bridge, London
- Office A2 Third Floor, 2 London Bridge, London
- Office A2 Third Floor, 2 London Bridge, London
- Fifth Floor, 2 London Bridge, London
- Fifth Floor, 2 London Bridge, London
- Fifth Floor, 2 London Bridge, London
- Basement Room B11, 4 Borough High Street, London
- Basement Room B11, 4 Borough High Street, London
- Basement Room B11, 4 Borough High Street, London
- Part Second Floor, 8-10 Borough High Street, London
- Part Second Floor, 8-10 Borough High Street, London
- Part Second Floor, 8-10 Borough High Street, London
- Sixth To Eleventh Floors West, 1 London Bridge, London
- Sixth To Eleventh Floors West, 1 London Bridge, London
- Sixth To Eleventh Floors West, 1 London Bridge, London
- Part Fifth Floor, Cottons Centre, Hays Lane
- Part Fifth Floor, Cottons Centre, Hays Lane
- Part Fifth Floor, Cottons Centre, Hays Lane
- 3-5 Tooley Street, London, Southwark
- 3-5 Tooley Street, London, Southwark
- 3-5 Tooley Street, London, Southwark
- First Floor Flat, 4-6 London Bridge Street, London
- First Floor Flat, 4-6 London Bridge Street, London
- First Floor Flat, 4-6 London Bridge Street, London
- Second Floor, Colechurch House, 1 London Bridge Walk
- Second Floor, Colechurch House, 1 London Bridge Walk
- Second Floor, Colechurch House, 1 London Bridge Walk
- Flat 7, Minerva House, Montague Close
- Flat 7, Minerva House, Montague Close
- Flat 7, Minerva House, Montague Close
- The Mudlark, Montague Close, London



- The Mudlark, Montague Close, London
- The Mudlark, Montague Close, London
- Part Third Floor Large, Cottons Centre, Cottons Lane
- Part Third Floor Large, Cottons Centre, Cottons Lane
- Part Third Floor Large, Cottons Centre, Cottons Lane
- Suite 212, 6 Hays Lane, London
- Suite 212, 6 Hays Lane, London
- Suite 212, 6 Hays Lane, London
- Fourth Floor West, 1 London Bridge, London
- Fourth Floor West, 1 London Bridge, London
- Fourth Floor West, 1 London Bridge, London
- Office A Fourth Floor, 2 London Bridge, London
- Office A Fourth Floor, 2 London Bridge, London
- Office A Fourth Floor, 2 London Bridge, London
- La Cave Restaurant, 6-8 Borough High Street, London
- La Cave Restaurant, 6-8 Borough High Street, London
- La Cave Restaurant, 6-8 Borough High Street, London
- Part Fourth Floor Large, Cottons Centre, Hays Lane
- Part Fourth Floor Large, Cottons Centre, Hays Lane
- Part Fourth Floor Large, Cottons Centre, Hays Lane
- 37 Tooley Street, London, Southwark
- 37 Tooley Street, London, Southwark
- 37 Tooley Street, London, Southwark
- 2 Tooley Street, London, Southwark
- 2 Tooley Street, London, Southwark
- 2 Tooley Street, London, Southwark
- Part Fifth Floor Large, Cottons Centre, Hays Lane
- Part Fifth Floor Large, Cottons Centre, Hays Lane
- Part Fifth Floor Large, Cottons Centre, Hays Lane
- Flat 4, Minerva House, Montague Close
- Flat 4, Minerva House, Montague Close
- Flat 4, Minerva House, Montague Close
- Suite 507, 6 Hays Lane, London
- Suite 507, 6 Hays Lane, London
- Suite 507, 6 Hays Lane, London
- Flat 3, Minerva House, Montague Close
- Flat 3, Minerva House, Montague Close
- Flat 3, Minerva House, Montague Close
- Part Third Floor, 10 Borough High Street, London
- Part Third Floor, 10 Borough High Street, London
- Part Third Floor, 10 Borough High Street, London
- Second Floor Front, 4 Borough High Street, London
- Second Floor Front, 4 Borough High Street, London
- Second Floor Front, 4 Borough High Street, London
- Third Floor West, 1 London Bridge, London
- Third Floor West, 1 London Bridge, London

- Third Floor West, 1 London Bridge, London
- Flat 17, 4-6 London Bridge Street, London
- Flat 17, 4-6 London Bridge Street, London
- Flat 17, 4-6 London Bridge Street, London
- Suite 301, 6 Hays Lane, London
- Suite 301, 6 Hays Lane, London
- Suite 301, 6 Hays Lane, London
- Second Floor Rear And Basement Rooms B2 And B9, 4  
Borough High Street, London
- Second Floor Rear And Basement Rooms B2 And B9, 4  
Borough High Street, London
- Second Floor Rear And Basement Rooms B2 And B9, 4  
Borough High Street, London
- Living Accommodation, The Mudlark, Montague Close
- Living Accommodation, The Mudlark, Montague Close
- Living Accommodation, The Mudlark, Montague Close
- Flat 11, Minerva House, Montague Close
- Flat 11, Minerva House, Montague Close
- Flat 11, Minerva House, Montague Close
- Old Hospital Block, 8A London Bridge Street, London
- Old Hospital Block, 8A London Bridge Street, London
- Old Hospital Block, 8A London Bridge Street, London
- Glaziers Hall, 9 Montague Close, London
- Glaziers Hall, 9 Montague Close, London
- Glaziers Hall, 9 Montague Close, London
- Flat 19, 4-6 London Bridge Street, London
- Flat 19, 4-6 London Bridge Street, London
- Flat 19, 4-6 London Bridge Street, London
- First Floor West, Cottons Centre, Cottons Lane
- First Floor West, Cottons Centre, Cottons Lane
- First Floor West, Cottons Centre, Cottons Lane
- Unit 3 Lower Level, Cottons Centre, Hays Lane
- Unit 3 Lower Level, Cottons Centre, Hays Lane
- Unit 3 Lower Level, Cottons Centre, Hays Lane
- Suite 503, 6 Hays Lane, London
- Suite 503, 6 Hays Lane, London
- Suite 503, 6 Hays Lane, London
- Suite Mint, 6 Hays Lane, London
- Suite Mint, 6 Hays Lane, London
- Suite Mint, 6 Hays Lane, London
- Suite 402, 6 Hays Lane, London
- Suite 402, 6 Hays Lane, London
- Suite 402, 6 Hays Lane, London
- Suite 203, 6 Hays Lane, London
- Suite 203, 6 Hays Lane, London
- Suite 203, 6 Hays Lane, London

- Part First Floor, 6-10 Borough High Street, London
- Part First Floor, 6-10 Borough High Street, London
- Part First Floor, 6-10 Borough High Street, London
- Ninth Floor East, 1 London Bridge, London
- Ninth Floor East, 1 London Bridge, London
- Ninth Floor East, 1 London Bridge, London
- Basement And Ground Floor, 8 London Bridge Street, London
- Basement And Ground Floor, 8 London Bridge Street, London
- Basement And Ground Floor, 8 London Bridge Street, London
- Borough Bar, London Bridge Street, London
- Borough Bar, London Bridge Street, London
- Borough Bar, London Bridge Street, London
- Part Third Floor Large, Cottons Centre, Hays Lane
- Part Third Floor Large, Cottons Centre, Hays Lane
- Part Third Floor Large, Cottons Centre, Hays Lane
- Borough Market, 8 Southwark Street, London
- 22 Park Street, Park Street, London
- 82 Wood Vale, London, SE23 3ED
- East Surrey Transport Committee, 50 Reddown Road, Coulsdon
- 84 MALTINGS PLACE, 169 Tower Bridge Road, london
- Flat 409 Block A, 27 Green Walk, London
- 40 Bermondsey Street, London, SE1 3UD
- 61 Gainsford Street, 1, London
- 8 The Ridge Way, Sanderstead, South Croydon
- The Shard, 31 St Thomas Street, London
- 22 Charing Cross Road, London, WC2H 0QL
- 7 Horseshoe Wharf Apartments, 6 Clink Street, London
- 57, Park Street, London
- 206 Hestia House, City Walk, London
- Sumner Street Buildings, London, Se1
- london bridge walk, london, 7

**Re-consultation Letters to Neighbours and Local Groups:**

**29.09.2021**

**Consultation Letters to Internal Consultees:**

17.11.2020

**Re-consultation Letters to Internal Consultees:**

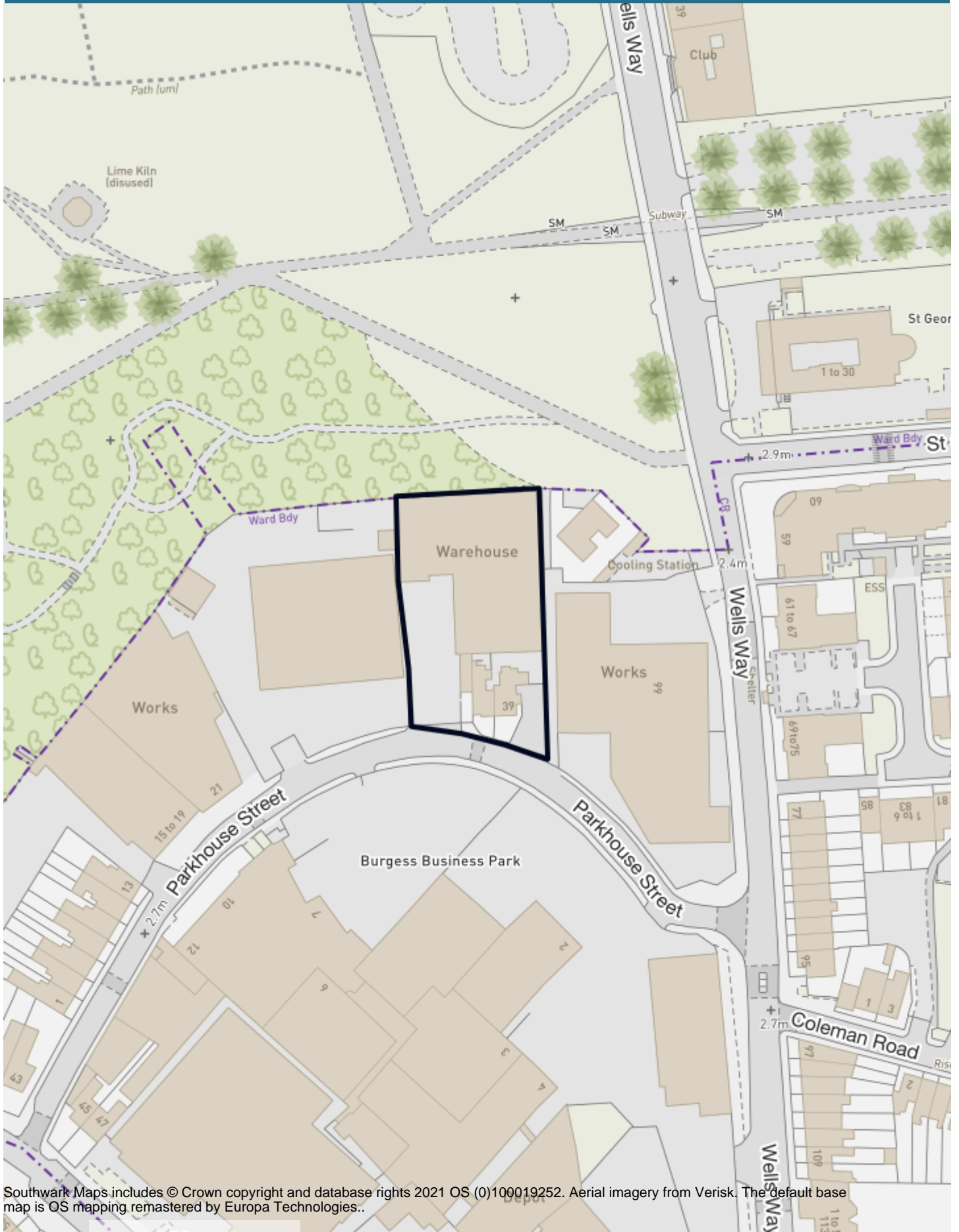
Name of Internal Consultee:	Reply Received?	Reply Received?
• Archaeology	27.09.2021	<b>YES</b>

• Community Infrastructure Levy Team	27.09.2021	<b>YES</b>
• Design and Conservation Team [Formal]	27.09.2021	No
• Local Economy	27.09.2021	No
• Ecology	27.09.2021	<b>YES</b>
• Planning Enforcement	27.09.2021	No
• Environmental Protection	27.09.2021	No
• Highways Development and Management	27.09.2021	<b>YES</b>
• Flood Risk Management & Urban Drainage	27.09.2021	No
• Transport Policy	27.09.2021	<b>YES</b>
• Urban Forester	27.09.2021	<b>YES</b>
• Waste Management	27.09.2021	No
<b>Consultation Letters to External Consultees:</b>		
No consultation was carried		
<b>Re-consultation Letters to External Consultees:</b>		
Name of External Consultee:	Reply Received?	Reply Received?
• Environment Agency	27.09.2021	<b>YES</b>
• Great London Authority	27.09.2021	<b>YES</b>
• Historic England	27.09.2021	<b>YES</b>
• London Fire & Emergency	27.09.2021	<b>YES</b>
Planning Authority		
• London Underground	27.09.2021	No
• Natural England - London & South East Region	27.09.2021	<b>YES</b>
• Network Rail	27.09.2021	<b>YES</b>
• Metropolitan Police Service	27.09.2021	<b>YES</b>
(Designing Out)		
• Transport for London	27.09.2021	<b>YES</b>
• Thames Water	27.09.2021	<b>YES</b>

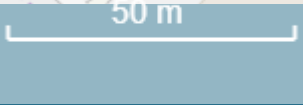
## Site Visit

Case officer site visit date:

Various dates.



Southwark Maps includes © Crown copyright and database rights 2021 OS (0)100019252. Aerial imagery from Verisk. The default base map is OS mapping remastered by Europa Technologies..



Scale =  
1:100 000 000 000

## Contents

Contents .....	1
EXECUTIVE SUMMARY .....	3
BACKGROUND INFORMATION.....	5
Site location and description .....	5
Details of proposal.....	7
Public consultation .....	8
KEY ISSUES FOR CONSIDERATION.....	12
Summary of main issues .....	12
Legal context.....	12
Planning policy .....	13
ASSESSMENT .....	15
Principle of the proposed development in terms of land use.....	15
Environmental impact assessment (EIA).....	19
Design quality.....	19
Trees and landscaping .....	26
Affordable housing .....	28
Mix of dwellings .....	29
Wheelchair accessible housing .....	30
Quality of accommodation .....	30
Impact of proposed development on amenity of adjoining occupiers and surrounding area	34
Ecology .....	38
Transport.....	40
Air quality .....	42
Flood risk.....	43
Sustainable development implications .....	44
Fire safety .....	47
Digital connectivity.....	47
Planning obligations (S.106 agreement) .....	48
Community involvement and engagement .....	52
Consultation responses from external and statutory consultees .....	53
Community impact and equalities assessment .....	55
Human rights implications .....	55
Positive and proactive statement.....	56

Positive and proactive engagement: summary table .....	56
CONCLUSION .....	56
BACKGROUND DOCUMENTS .....	58
APPENDICES.....	58
AUDIT TRAIL.....	58

<b>Item No.</b> 7.2	<b>Classification:</b> OPEN	<b>Date:</b> 14 September 2022	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>	<b>Development Management:</b>  <b>Address:</b> 35-39 Parkhouse Street, London SE5 7TQ  <b>Proposal:</b> Demolition of existing buildings and construction of a mixed-use building up to nine storeys in height, comprising 85 residential units (Use Class C3) and 1,306 sqm (GIA) of commercial floorspace (Use Class E(g), B2 and B8) with associated car parking, landscaping and other associated work.		
<b>Ward(s) or groups affected:</b>	St Giles		
<b>From:</b>	Director of Planning and Growth		
<b>Application Start Date</b>	15.11.2019	<b>Expiry Date</b>	14.02.2020
<b>Earliest Decision Date</b>	07.02.2022	<b>PPA Date</b>	31.12.2022

## RECOMMENDATION

1. That planning permission be granted, subject to conditions and the applicant entering into an appropriate legal agreement by no later than 31 December 2022.
2. In the event that the requirements of (1.) are not met by 31 December 2022, that the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reason set out at paragraph 218 of this report.

## EXECUTIVE SUMMARY

3. This application is for the redevelopment of an industrial site to provide modernised and improved employment floorspace in addition to a significant number of new homes. Currently occupied by low rise brick built commercial buildings and two dwellings converted into four flats, the site is located on the north side of Parkhouse Street immediately to the south of Burgess Park and was previously considered to be a preferred industrial location. Burgess Park, which shares a boundary with the application site, is a site of importance for nature conservation (SINC).
4. When originally submitted, the proposed development sought consent for a ten storey building up to 35.5 metres in height with 100 'Build to Rent' homes and 1,323smq of commercial floorspace. Following concerns raised as part of the initial consultation process, feedback from officers and a requirement to work collaboratively with the adjacent landowners, the applicant sought to make significant revisions to the proposed development.



5. A completely redesigned scheme was then submitted as part of the current application. The revised scheme proposes 85 new homes (40% of which would be affordable) as well as full re-provision of the existing employment floorspace. The building was reduced in height to 27.23 metres and the layout, detailed design and architecture was fully reconsidered.
6. The proposed re-provided employment floorspace would be modern, flexible and more appealing to a range of potential tenants. The 85 new flatted dwellings that would be provided would be a net uplift of 81 homes and affordable housing would be provided at 40% with a policy compliant tenure split, unit mix and proportion of wheelchair homes. The proposed housing would be high quality with a high proportion of dual aspect units and all units benefitting from private amenity space.
7. Carbon emissions would be reduced by 49% above the building regulations which is well in excess of the 35% required by policy and a financial contribution would be secured to achieve carbon zero status. The development would make use of air source heat pumps and mechanical ventilation and heat recovery to deliver these on-site savings.
8. The development would have minimal impact on existing nearby residents with no significant adverse impacts identified in terms of daylight/sunlight, overlooking, loss of privacy or loss of outlook. Emerging schemes in the area have also been considered and the proposed development would have no detrimental impact on the new developments approved on the adjacent sites.
9. New landscaping and tree planting would provide greening and increase biodiversity on what is currently a hard-surfaced site devoid of any trees and a 95% biodiversity net gain would be achieved. Ecological impacts upon the adjoining SINC have been carefully considered through an independent ecological assessment, and following mitigation through conditions and planning obligations it is considered that there would be no significant adverse impacts.
10. The height, scale and massing of the building is considered to positively respond to the existing and emerging character and would have no adverse impact on adjacent heritage assets. The development is considered to be high quality in terms of design and architecture. The proposed materials are robust, contextual and would ensure a quality finish befitting of this important location adjacent to Burgess Park.
11. Transport impacts would be minimal and the development would contribute to transport improvements in the area including contributions towards bus improvements, cycle hire and highways improvements.

12.

Homes	Private Homes	Private HR.	Aff.SR Homes	Aff.SR HR	Aff.Int Homes	Aff.Int HR	Homes Total (% of total )	HR Total
Studio	4	8	0	0	0	0	4 (5%)	8

1 bed	16	34	8	16	6	12	30 (35%)	62
2 bed	18	66	9	36	3	12	30 (35%)	114
3 bed	13	65	4	20	4	20	21 (25%)	105
Total and (% of total)	51 (60%)	173 (60%)	31 (25%)	72 (25%)	13 (15%)	44 (15%)	85	289

13.	<b>Use Class</b>	<b>Existing sqm</b>	<b>Proposed sqm</b>	<b>Change +/-</b>
	Affordable workspace Use Class E	0	130 (10%)	+130
	Use Class E (g), B2 and B8	1,304	1,306	+2

14.		<b>Existing sqm</b>	<b>Proposed sqm</b>	<b>Change +/-</b>
	Public Open Space	0	Improvements to Parkhouse Street including increased pavement widths and new tree planting.	
	Play Space	0	255	+255

15.	<b>CO2 Savings beyond part L Bldg. Regs.</b>	<b>%</b>
	Trees lost	1 Class C
	Trees gained	5

16.		<b>Existing</b>	<b>Proposed</b>	<b>Change +/-</b>
	Urban Greening Factor	0	0.4	+0.4
	Greenfield Run Off Rate	90.1 l/s	2.5 l/s	-87.6 l/s
	Green/Brown Roofs	0	210 sqm	+210 sqm
	EVCPS (on site)	0	3	+3
	Cycle parking spaces	0	154	+154

17.	<b>CIL (estimated)</b>	<b>£262,080</b>
	<b>MCIL (estimated)</b>	<b>£449,280</b>
	<b>S106</b>	<b>£514,835</b>

## BACKGROUND INFORMATION

### Site location and description

18. Located on the north side of Parkhouse Street on the southern boundary of Burgess Park, the application site measures approximately 0.24 hectares and currently comprises a single storey brick built warehouse building and two 1950s dwellings that have been converted to four flats. The site is currently occupied by World Wide Ltd a wholesale brewery. Prior to that it was occupied by a packaging company (J Hunnex & Sons).

Site location



19. Existing vehicular and pedestrian access to the proposed development site is via Parkhouse Street (a one way road), which borders the site to the south, and forms a loop between Southampton Way and Wells Way. The site is in a predominantly industrial area, although there are residential uses at 1-13 and 37-39 Parkhouse Street. The site adjoins Burgess Park to the north which is Metropolitan Open Land (MOL) and a Site of Importance for Nature Conservation (SINC). There is a wooded area within the park which immediately adjoins the site which is known as the New Church Road Nature Area. To the east is an industrial building and associated yard at Parkhouse Street, Burgess Business Park is to the south on the opposite side of Parkhouse Street, and an industrial building at 25-33 Parkhouse Street adjoins to the west.
20. The site is subject to the following planning designations:
- Urban Density Zone
  - Air Quality Management Area
  - Area where 35% affordable and 35% private housing is required;
  - Site allocation NSP 25 'Burgess Business Park'
  - Public transport accessibility level (PTAL) 2 (low)
21. The site is within the setting of the Addington Square Conservation Area and grade II listed buildings the Lime Kiln in Burgess Park and the former St Georges Church and Groundwork Trust Offices on Wells Way.

### Images of application site



### Details of proposal

22. Planning consent is sought for the demolition of all buildings on site and redevelopment to provide a nine storey building with a maximum height of 27.23 metres above ground level. Arranged in an 'H' formation, the development would provide 1,306 sqm (GIA) of Class E commercial floorspace on the ground floor and mezzanine level whilst the upper floors would accommodate 85 new flatted dwellings as set out below:

Unit type	Market	Social rented	Intermediate	Total
Studio	4	0	0	4
1-bed	16	8	6	30
2-bed	18	9	3	30
3-bed	13	4	4	21
<b>Total</b>	<b>51</b>	<b>21</b>	<b>13</b>	<b>85</b>

Image – proposed development viewed from Parkhouse Street



23. Vehicular access would be gained from Parkhouse Street to a yard on the western flank of the site. This would enable servicing to be undertaken off-street and would also provide three accessible car parking spaces. Whilst the two residential cores could be accessed from this yard the principal residential entrance would be from Parkhouse Street which would also provide access to the main cycle parking area.

### **Public consultation**

24. Following the initial consultation on the originally submitted scheme, a total of 69 representations were received from neighbours and local groups (including Wells Way Triangle Residents Association) objecting to the proposed development. Two representations offering support for the development were received. These representations are summarised below:

25. Support

- Burgess Business Park is a small pocket of underutilised light industrial space that is no longer fit for purpose, with little demand for available space.
- The site could be repurposed to yield a significant number of housing units, which are desperately needed in the Borough, without evicting existing occupiers and returning the area to a suitable use.
- The proposals meet the minimum affordable housing criteria, which is excellent.
- There is a severe shortage of housing in London and especially in Camberwell.
- In Southwark the average first time buyer deposit is over £100,000, this is simply impossible to achieve for the vast majority of young people. Any action to increase the supply of housing will help relieve the housing crisis.
- It should be noted that this development is well placed, close to amenities such as Burgess Park, two bus routes, three current or proposed cycle routes and it will be a short walk from a proposed London Underground

Station on Old Kent Road.

- This is a car free development, there are too many motor vehicles on the streets around Burgess Park so this is also a positive.

## 26. Objection

Amenity impacts

- Loss of light and increased overshadowing to Burgess Park.
- Biodiversity in the nature area of the park will suffer because of overshadowing.
- The park would be impacted by the development as a result of having a tall building on its boundary.
- Noise coming from the outdoor space within the new development and restriction of light due to the height of the building will have a major impact into the Nature area.
- The tree on site should be protected.
- The development would result in disturbance including noise and dirt.
- There would be daylight impacts to local residents.
- There should be an ecological appraisal.

## 27. Design issues

- Site not suitable for tall buildings.
- The development is too high and out of context with its surroundings.
- Burgess Business Park should be designated as an Action Area or Opportunity Area and require master-planning to enable any taller elements to be delivered in a more coherent way.
- The scheme would be overdevelopment.
- The scheme would be over dense as a result of the excessive height.
- The development is ugly.
- The excessive height will have a negative impact on heritage assets.
- The site is inappropriate for a tall building
- The development is not set back sufficiently from the park.

## 28. Housing

- There is a lack of affordable housing.
- The development does not provide play space for the 12+ age group and Burgess Park is expected to take the strain.
- The housing would be poor quality.
- The development is not of an exemplary design in that almost all bathrooms are windowless and do not have natural light.

## 29. Land use

- The industrial estate should be retained and used to provide local jobs for local people.

## 30. Sustainability and infrastructure

- Transport, education and health services would be impacted by the increase in number of homes.
- There are no plans to incorporate renewable energy in the scheme to prevent additional carbon being emitted when it is in use.

31. Transport
- The development would put pressure on public transport.
  - The development will result in increased parking pressures.
  - Insufficient cycle parking is being provided.
32. Following this consultation exercise, the applicant engaged with officers and the landowners of the adjacent development sites in order to address wider and shared objectives in order to deliver a co-ordinated approach to development in the area and this is discussed further in the report. As a result of this engagement, the applicant fully revised the scheme, reducing the number of homes and building height as well as following a new architectural approach and an amended design. The amendments can be summarised as:
- A reduction in the number of homes proposed from 100 to 85 (an overall reduction of 15 homes), with 40% to be secured as affordable housing (based on habitable rooms).
  - An increase in dual aspect or single aspect south, east and west facing from 76% to 87%.
  - A reduction in the overall height and massing of the proposals compared to the previously submitted proposals, to a six-storey shoulder in accordance with the aspirations of the Local Development Study (LDS) with a pop up seventh floor.
  - Further setbacks from Burgess Park boundary with no balconies projecting into 5 metre ecological buffer zone.
  - 10% wheelchair adaptable homes retained.
  - Building set back further from Parkhouse Street to provide a more generous street.
  - Play space enlarged with a better outlook onto Burgess Park and
  - A retention of the re-provided commercial high quality floorspace.
33. As a result of the proposed amendments a further statutory consultation was undertaken by the council in addition to the consultation undertaken locally by the applicant. Following the council's re-consultation, a total of nine objections and one representation of support have been made. The response offering support states simply that they are generally supportive of the development but are of the view that the cycle parking is insufficient. The objections received do not raise any new issues further to those set out above.

#### Friends of Burgess Park

34. When consulted on the original scheme, Friends of Burgess Park (FoBP) objected on the following grounds:
- The development is too tall and represents overdevelopment of the site.
  - The height and proximity of the development to the park will reduce openness and impact on park users.
  - The development would be overbearing.
  - MOL should be protected from inappropriate development, particularly in inner London where there is limited green space of substantial size, an increasing population, higher density dwellings and fewer people having their own garden or open space.

- Loss of sunlight, noise and light pollution would adversely impact the nature area. There would be an adverse impact on heritage assets.
- Height, density and design of towers on local townscape. Should optimise the site not maximise it
- The density significantly exceeds policy. The development does not meet planning policy for densification in transports hubs or around high street area.
- Burgess Park should not make up for any playspace shortfall.
- Does not meet required urban greening factor in the draft London Plan.
- Green space is increasingly important for health, wellbeing and social interaction.
- Park will be affected by overlooking, encroachment and less use of the space as it becomes less appealing.

35. Following the scheme re-design, FoBP have made the following comments:

- FOBP recognises that the applicant has amended the earlier designs responding to comments and consultation.
- Although the building is going to be reduced in height, the buildings at 27.23m will still have an effect on Burgess Park.
- The proposed development responds to the planning policy site brief for taller buildings - under 30m in height. The height as shown on the illustrations does not appear to impinge on the views of St George's Church tower from across the park, which are an essential element of the local heritage and character.
- The building appears to sit below the tree line so that it will not dominate the park edge or intrude visually into the park. The height below the treeline will also reduce the impact of shadowing across the park from this north facing site, but still a consideration.
- The development maintains the boundary with Burgess Park, respects the 5m set back and has developed a sympathetic bio-diverse roof space along the wall responding to the location beside the park.
- The TPO tree on the corner of the site with Parkhouse St has been given an appropriate space and setting with additional planting.
- The industrial space is replaced with a small increase in the size.

36. FoBP have requested the following provision be made:

- The Urban Greening Factor of 4 achieved in this park side location.
- Provision for play (leisure/amenity provision) for over 12's developed within Burgess Park responding to developers around the park not meeting this need on site.
- Developers across the Parkhouse St properties being encouraged to develop a co-ordinated plan on the play offer, to reduce repetition and increase variety of the offer particularly in shared/communal areas.
- Developers collaborating on a cohesive public realm across Parkhouse Street as a whole.
- The design for balconies, lighting and noise impact on the park to be minimised.
- Swift boxes and bat boxes incorporated into the building.



- FOBP call for all developments near Burgess Park to maximise the green benefits of their development to be sympathetic to the park-side location.

## KEY ISSUES FOR CONSIDERATION

### Summary of main issues

37. The main issues to be considered in respect of this application are:
- Principle of proposed development in terms of land use, including departure from policies to protect preferred industrial locations
  - Environmental impact assessment
  - Design, including building heights and impacts of tall buildings on local views
  - Impact on heritage assets
  - Trees and landscaping
  - Ecology
  - Density
  - Affordable housing
  - Mix of dwellings
  - Wheelchair accessible housing
  - Quality of accommodation
  - Impact of proposed development on amenity of adjoining occupiers and surrounding area
  - Transport
  - Air quality
  - Flood risk
  - Sustainable development implications
  - Fire safety
  - Digital Connectivity
  - Archaeology
  - Planning obligations (S.106 undertaking or agreement)
  - Mayoral and borough community infrastructure levy (CIL)
  - Community involvement and engagement
  - Community impact and equalities assessment
  - Consultation responses from external and statutory consultees
  - Human rights
  - Positive and proactive statement

These matters are discussed in detail in the 'Assessment' section of this report.

### Legal context

38. 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 and the Southwark Plan 2022. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers determining planning applications for development within Conservation Areas to pay special attention to the

desirability of preserving or enhancing the character or appearance of that area. Section 66 of the Act also requires the Authority to pay special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest which they possess.

39. There are also specific statutory duties in respect of the public sector equalities duty which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

## **Planning policy**

40. The statutory development plan for the Borough comprises the London Plan 2021 and The Southwark Plan (2022). The National Planning Policy Framework (2021) constitutes material considerations but is not part of the statutory development plan. A list of policies which are relevant to this application is provided at Appendix 2. Any policies which are particularly relevant to the consideration of this application are highlighted in the report.

### Site allocation NSP25

41. The site falls within site allocation NSP25 in the Southwark Plan 2022 and this allocation covers the entire PIL. The site forms a small part of the overall site allocation as shown on the image below, which shows the full extent of NSP25 with the application site hatched in red. The various requirements for NSP25 are also set out below.
42. NSP 25 states that redevelopment of the site must:
- Ensure every individual development proposal increases or provides at least the amount of employment floorspace (E(g), B class) currently on the site; and
  - Provide new homes (C3); and
  - Enhance permeability including new north-south and east-west green links; and
  - Provide public realm improvements including a square.
43. The site allocation also considers that redevelopment of the site should:
- Provide industrial employment space (E(g)(iii)); (industrial processes)
  - Provide active frontages (retail, community or leisure uses) at appropriate ground floor locations.
44. The site allocation has a minimum residential capacity of 681 homes. The design and accessibility guidance states that development should establish green links into Burgess Park and from Chiswell Street to Newent Close, opening up access for new and existing residents with a new public realm offer throughout the site. Consideration should be given to focal points of activity and active frontages that encourage footfall. Redevelopment should enhance existing and proposed pedestrian and cycle routes including the Southwark Spine and good accessibility to bus stops.

## **Other relevant guidance**

45. The council recently commissioned a Local Development Study (LDS) which was completed in October 2020. The purpose of the Parkhouse Street LDS is to promote a design strategy for development for the Parkhouse Street area in order to co-ordinate developer activities and encourage a cohesive form of development across the various landownerships. The LDS covers the area outlined in red below which is described in the LDS as the composite site. Currently there are five landowners which have submitted proposals for sites in this area and timescales are broadly in parallel, which presents a unique opportunity to address wider and shared objectives in order to deliver a co-ordinated approach to development in the area.

46.



47. The LDS sets out a strategic response to the planning policy guidance that exists and is to be used as the basis for discussion between the various landowners. It should be noted that the LDS has no statutory Planning status; it is however an agreed reference point for a cohesive design approach. Relevant to this particular application is the principle of a mixed use redevelopment, maintaining an appropriate buffer to Burgess Park, a physical and potentially a visual link to the Lime Kiln in Burgess Park with active uses along the link, a consistent shoulder height along the Parkhouse Street frontage, the mix of uses, and public realm improvements to Parkhouse Street. Planning consent, has been granted for the following three sites:
48. **21-23 Parkhouse Street – 19/AP/0469** - Demolition of existing building at 21-23 Parkhouse Street and erection of two blocks (Block A and Block B) of 5 and part-7/part-10 storeys. Block A comprises 5-storey block for commercial/employment use (879sqm) and Block B comprises a part-7/part 10-storey block with ground floor commercial/employment use (111sqm) and 33 residential dwellings, accessible car parking, cycle parking, refuse storage, and associated landscaping  
Granted – 14.04.2022
49. **25-33 Parkhouse Street – 20/AP/0858** - The redevelopment of the site to provide a mixed-use development comprising buildings up to 11 storey's in height and accommodating new homes (Use Class C3) and commercial floorspace (Use Class B1c), car parking, cycle parking and associated landscaping.

Granted with legal agreement 27.05.2022

50. **Burgess Business Park – 21/AP/1342** - Demolition of the existing buildings and redevelopment of the site to provide residential units (Class C3), flexible commercial floorspace (Class E) and community floorspace (Class F) within 12 blocks of between 2-13 storeys, with car and cycle parking and associated hard and soft landscaping and public realm improvements.  
Granted subject to completion of legal agreement.

## **ASSESSMENT**

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

51. The National Planning Policy Framework (NPPF) was updated in July 2021. At the heart of the NPPF is a presumption in favour of sustainable development. The framework sets out a number of key principles, including a focus on driving and supporting sustainable economic development. Section 6 of the NPPF 'Building a strong, competitive economy' states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses, and address the challenges of the future.
52. Policy E4 of the London Plan 2021 seeks to ensure that there is a sufficient supply of land and premises in London to meet current and future demands for industrial and related functions, and the site falls within the locally significant industrial site category under this policy. Policy E6 of the London Plan relates specifically to locally significant industrial sites, and requires boroughs to designate such sites in their development plans and to make clear the range of industrial and related uses which would be acceptable in these locations. Policy E7 of the London Plan relates to industrial intensification, co-location and substitution. Development plans and proposals should be proactive and encourage the intensification of business uses in classes B1c, B2 and B8 occupying all categories of industrial land. In locally significant industrial sites the scope for co-locating industrial uses with residential and other uses may be considered, and must be plan-led. This is subject to certain criteria being met such as industrial uses not being compromised in terms of their continued efficient function, access and servicing, and subject to appropriate design mitigation within the residential units to enable industrial uses to function efficiently.
53. Whilst previously designated as a Preferred Industrial Location (PIL), the site designation has been replaced by the site allocation (NSP25) in order to become a mixed use neighbourhood and this aligns with London Plan policy E7. The site allocation sets out the land use requirements, which are for every individual development proposal within NSP25 to increase or provide at least the amount of employment floorspace currently on the site, and to provide new homes.
54. Policy P30 of the Southwark Plan requires replacement or increased

employment space where required by site allocations. In exceptional circumstances a loss of employment floorspace may be accepted where the retention or uplift in employment space is not feasible. This must be demonstrated by a marketing exercise for two years immediately prior to any planning application, and should be for its existing condition and as an opportunity for an improved employment use through redevelopment which shows that there is now demand.

#### Provision of employment floorspace

55. The site currently contains 1,304sqm (GIA) of Class E (formerly Class B) floorspace which is in storage and distribution use by World Wide Ltd, a wholesale brewery. The proposed development would include 1,306sqm (GIA) of light industrial floorspace (Class E (g)) with a vision to attract more affordable co-working serviced offices along with light industrial and workshop occupiers. This would represent a minor increase of 2sqm in employment space compared to that which currently exists on the site which would comply with the London Plan policies outlined above as well as NSP25. It is noted that policy P36 of the draft NSP requires an impact assessment for office proposals over 1,000sqm which are outside of town centres such as this site. However, as there is a specific requirement under the site allocation to replace or increase the existing amount of employment floorspace, no impact assessment is required in this instance.
56. The proposed employment space would be good quality and would be split between three units making them more attractive to small business owners. All of the units would benefit from level access at street level and as such do not require extensive loading and unloading facilities or goods lifts.
57. In accordance with policy E7 of the London Plan, a planning obligation is required to ensure that the commercial floorspace would be completed in advance of any of the residential units being occupied. A condition has been included in the draft recommendation to secure an appropriate level of fit-out for the units.

#### Existing business retention

58. Policy P31 of the Southwark Plan relates to affordable workspace and stipulates that development be required to retain small and independent businesses on a site and where they are at risk of displacement, to provide suitable affordable workspace for them within the completed development. Policy P33 - Business Relocation, requires applicants to provide a business relocation strategy in consultation with affected businesses which must set out viable relocation options.
59. The current occupier is Worldwide Beers Limited who occupy the commercial space on a short basis and the existing lease commenced on 2 May 2018, well after the point at which the applicant had commenced formal pre-application discussions with the council. A short term lease was offered to the current occupier as it was always intended to be a temporary occupation in lieu of site redevelopment. As such, a Business Relocation Strategy has not been submitted or requested in this instance.

### Affordable workspace

60. Policy E2 (C) of the London Plan requires proposals for new B1 floorspace greater than 2,500 sqm (GEA) or a locally determined lower threshold to consider the scope to provide a proportion of flexible workspace suitable for micro, small and medium-sized enterprises. Policy E3 relates to affordable workspace and the use of planning obligations to secure affordable workspace at below market rates. Policy E8 of the London Plan is also relevant, which states that employment opportunities for Londoners across a diverse range of sectors should be promoted and supported, along with support for the development of business growth and sector-specific opportunities. It requires the delivery of suitable workspaces to support the evolution of London's diverse sectors including start-up space and affordable workspace.
61. Southwark Plan policy P31 – Affordable Workspace, requires development of 500sqm (GIA) or more employment floorspace to:
- Deliver at least 10% of the proposed gross employment floorspace as affordable workspace on site at discount market rents; and
  - Secure the affordable workspace for at least 30 years; and
  - Provide affordable workspace of a type and specification that meets current local demand; and
  - Prioritise affordable workspace for existing small and independent businesses occupying the site that are at risk of displacement. Where this is not feasible, affordable workspace must be targeted for small and independent businesses from the local area with an identified need; and
  - Collaborate with the council, local businesses, business associations and workspace providers to identify the businesses that will be nominated for occupying affordable workspace.
62. If it is not feasible to provide affordable workspace on site then the policy allows for an in lieu payment to be made for off-site affordable workspace. Additionally, the policy allows for the provision of affordable retail and cultural uses, albeit in exceptional circumstances only.
63. In seeking to meet the requirements of Policy P31, the applicant has agreed to the following AWS provisions:
- 10% affordable workspace (130 sqm) to be provided;
  - The affordable workspace to be secured for a 30 year term and the same occupier could remain for the entire period;
  - No more than 50% of the market rate floorspace to be occupied until the affordable workspace has been fitted-out ready for occupation;
  - Rent on the affordable workspace to be a 25% discount on market rent inclusive of service charge for the 30 year term (this currently equates to £15 per square foot);
  - Flexible leases;
  - Applicants for the affordable workspace must either have an existing small and independent business in Southwark or be a resident of Southwark and the proposed use must be from a specific sector which has a social, cultural or economic development purpose or to accommodate an existing

- occupier at the site;
- During the construction period, a database of interested parties must be compiled and maintained;
- On completion, the affordable workspace must be marketed using a website, newspapers, agencies, managing agent, database, and external signage. It must be actively marketed for nine months to Southwark businesses and residents. Only if the space remains unoccupied after this period of marketing can it be made available to the same types of businesses outside of Southwark which would be permitted to remain in the affordable space, paying affordable rent, for up to five years. After those five years, the process would start again. During this time the existing tenant(s) could remain until a suitable Southwark tenant is found;
- The day-to-day management of the space to be carried out by a suitably competent management company;
- Each unit would be equipped with mechanical and electrical fit-out, sprinklers, heating and cooling provision and kitchen and WC facilities.

#### Provision of new homes

64. The NPPF makes it clear that delivering a significant number of new homes is a key priority for the planning system. London Plan Policies GG4 and H1 reinforce the importance of delivering new homes, setting a 10 year target of 23,550 new dwellings for Southwark. Southwark policies reiterate the importance of delivering significant numbers of new dwellings. The Southwark Plan has identified capacity to meet the London Plan target of 23,550 by 2028.
65. The provision of new housing on the site would comply with site allocation NSP25. Of note is that the Planning Committee resolved to grant permission for three developments on Parkhouse Street which include residential accommodation, one at 21-23 Parkhouse Street (reference: 19/AP/0469); another at 25-33 Parkhouse Street (reference: 20/AP/0858); and most recently at Burgess Industrial Park (reference 21/AP/1342) . Following the completion of s106 agreements planning permission was granted in April 2022 for the proposed development at 21-23 Parkhouse Street and in May this year for the proposed development at 25-33 Parkhouse Street.

#### Agent of change principles

66. E7 of the London Plan supports the intensification of industrial uses and co-locating industrial and residential uses, provided the ability of the industrial uses to operate efficiently is not compromised. Light industrial uses can generally sit comfortably alongside residential uses. However, it is important to ensure that such uses are accommodated within buildings that are fit for purpose in terms of layout and construction techniques, and that proper regard has been given to technical matters such as soundproofing and ventilation. London Plan policy D13 requires all developments to consider 'agent of change' principles to ensure that where new developments are proposed close to existing noise-generating uses, they are designed in a sensitive way to protect the new occupiers, such as residents and businesses, from noise and other impacts. Policy E7 of the London Plan also seeks to ensure that industrial activities are not compromised in areas where residential uses are provided alongside industrial uses. This is an important consideration for this site given the proximity of proposed

residential uses in relation to existing and proposed employment uses.

67. The development has been designed to ensure that the commercial floorspace and the residential accommodation can co-exist without any significant residential amenity or commercial operation impacts. In order to further minimise any potential conflict of use, appropriately worded conditions to ensure that the residential units would be appropriately sound-proofed to reduce the likelihood of any noise complaints against neighbouring industrial uses are recommended. It is noted that some of the neighbouring sites are subject to planning applications for redevelopment including residential in any event.

#### Land use conclusion

68. Overall, the proposed development is considered to be acceptable in land use terms. It would provide an uplift in employment space, albeit minimal, which would be of good quality and flexibly designed. A policy compliant amount of affordable workspace would be provided, and the provision of new homes would meet the requirements of the site allocation (NSP25) of the Southwark Plan as well as complying with policy E7 of the London Plan. The contribution towards employment space and housing in the borough are noted as positive aspects of the proposal.

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

69. The proposed development does not meet or exceed any of the thresholds set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and as such an EIA is not required in this instance.

#### **Design quality**

70. The NPPF stresses that good design is a key aspect of sustainable development and is indivisible from good planning (paragraph 124). Chapter 3 of the London Plan seeks to ensure that new developments optimise site capacity whilst delivering the highest standard of design in the interest of good place making. New developments must enhance the existing context and character of the area, providing high quality public realm that is inclusive for all with high quality architecture and landscaping.
71. The importance of good design is reinforced in the Southwark Plan. Policies P13 and P14 require all new buildings to be of appropriate height, scale and massing, respond to and enhance local distinctiveness and architectural character; and to conserve and enhance the significance of the local historic environment. Any new development must take account of and improve existing patterns of development and movement, permeability and street widths; and ensure that buildings, public spaces and routes are positioned according to their function, importance and use. There is a strong emphasis upon improving opportunities for sustainable modes of travel by enhancing connections, routes and green infrastructure. Furthermore, all new development must be attractive, safe and fully accessible and inclusive for all.



72. Site allocation NSP25 assumes redevelopment at a higher density than the existing buildings, and employment space to be re-provided, along with new homes. The overall area should have enhanced east-west and north south routes, including into Burgess Park.
73. Objections have been received that the proposed building is too tall, poorly designed and that the site is not suitable for a development of this size.

#### Image – Emerging context



#### Urban design (height, scale, massing and arrangement)

74. The proposal has been arranged on three urban design principles: to reinforce the Parkhouse Street frontage and offer natural surveillance and active frontages onto the street; to respect the Burgess Park edge setting back from the mature planted 'Nature Area' at the southern edge of the park; and the courtyard design of the recently consented neighbouring scheme (25-33 Parkhouse Street).
75. The design is arranged in H-shape with one flank fronting onto Parkhouse Street, the other flanking Burgess park and the link block defining two courtyards. One courtyard to the west is set at ground level and marries up with a similar-sized courtyard on the neighbouring plot. The eastern courtyard is at podium level and is designed as a communal garden accessible by all future residents. This arrangement is natural and reflects all the key principles of urban design as set

out in the LDS.

76. The development has a generously sized (over 5m high) commercial base providing high quality space for businesses accessed from Parkhouse Street and the shared courtyard. Above that the blocks rise to a shoulder height of six-storeys with a set-back 1.5-storey high attic. The blocks are clad in brick up to the shoulder with generous overhanging balconies and the attic storey is clad in a dark grey metal cladding formed in gabled roof forms that emulate the industrial heritage of the site.

Image – view from Burgess Park with existing boundary wall retained



77. Whilst the block is urban in character on Parkhouse Street with a confident geometrical appearance, the wing facing onto Burgess Park is staggered to break down its massing and introduce a measure of dual aspect capitalising on views across the park. In this location the building is set at least five metres back from the park edge and will appear behind the retained gabled warehouse wall located at the park edge.
78. The proposed height is appropriate and relates well to the recently consented developments nearby respecting the consented 'shoulder' heights. This plot does not include a tall building and takes its cue from the setting of the spire of the former St George's church. It does this by defining a cone of vision from the approaching path that ensures the church spire is not interrupted by building mass in its backdrop when viewed from the park.
79. In conclusion, the block has been carefully crafted in a direct response to its context and its urban setting. It is highly articulated and is set at a scale and

massing that does not appear overly dominant. It reinforces the street edge appropriately on Parkhouse Street, offering natural surveillance from the upper floors and creating confident active frontages along the full length of the street edge. The arrangement allows the site to be serviced on the plot. On the park edge it will become part of a continuous frontage that is slightly taller than the mature tree-lined edge of the park, forming an articulated park edge when considered cumulatively with the recently consented developments. This is a consistent approach to the Park and will give it a strong edge without appearing overly dominant or discordant.

Image – Internal views



80. In conclusion, the urban design approach to this plot is sound, reflects all the key principles set out in the LDS and will deliver a building that will complement its urban, parkland and historic setting.

Architectural design (fabric, function and composition)

81. The design is well conceived and mannered, making the most of its highly articulate form and responding to its context. The main body of the building (up to its six-storey 'shoulder') is clad in brick to reflect the prevailing material in the area.
82. The simple elegant street façade is punctuated by the projecting forms of the residential balconies arranged in three columns. In contrast, the more articulated profile of the Burgess Park frontage the balconies are set within the stepped profile of the building so as not to appear to be reaching over or dominating the mature landscape. On the prominent eastern flank, the largely blank façade of the party walls are embellished with two large butterfly motifs, reflecting the local landmark on the listed Wells Way Baths building, a recognised local landmark in the area.

83. The set-back attic storey homes are clad in a dark grey metal and the roof takes on the serrated profile of an industrial roof. This not only reflects the industrial heritage of the Parkhouse Street Industrial Estate, an echo of this local memory, but also gives the block an interesting and elegant silhouette.
84. The development provides high quality homes of exemplary quality, a high proportion of dual aspect homes and generous proportions. At the same time the development blends the two uses, hard-working commercial spaces on the ground floor with residential uppers, in a deft and confident manner. The service entrance on the western edge of the site leads to a commercial yard – which is designed to complement the yard on the neighbouring plot and create a commercial cluster. The residential entrance is on the eastern edge of the site and leads to the two separate cores, linked by a top-lit corridor and communal cycle store. On the podium, in the space between the two wings, is an east-facing elevated garden for residents which will include play-space for children.

Image – Ground floor layout



85. In conclusion, the proposed design is well conceived, it proposes high quality contextual finishes in a highly articulated form and includes design features that ensure the needs of future occupiers are addressed. The quality of the design will rely to a large degree on the quality of detailing and the choice of materials. Accordingly conditions requiring 1:5 and 1:10 scale construction details as well as sample panels of all the finishes is recommended if Members are minded to approve this development. The retained flank wall of the current warehouse which faces onto Burgess Park will also require conditions for a detailed

measured and condition survey as well as a Method Statement for its retention and integration into the final development.

### Heritage assets

86. The site does not include any listed building and does not fall within a designated conservation area. At the centre of the site is a 1960s warehouse building and a large brick-built industrial chimney. Both are recognised in the LDS as being of local interest. The proposal seeks to remove the warehouse but retains the chimney and makes it a focal point of the new arrangement as suggested by the LDS.
87. Objections have been received that the development would have an adverse impact on views and heritage assets.

### Image – view from Limekiln



88. The nearest designated heritage assets include the Grade II Listed 73, 75 and 77 Southampton Way, Collingwood House on Cottage Green and No 113 Wells Way which are immediately adjacent the site. The proposal on this site, due to its scale and massing is unlikely to affect the settings of these listed buildings.
89. Further afield are a number of heritage assets located within or adjacent to Burgess Park. These include the Addington Square Conservation Area, and the Grade II Listed Limekiln, the Wells Way Baths and the Former Church of St George on Wells Way.
90. The Former Church of St George is a notable feature of the recent upgrade of Burgess Park being the focus of a number of routes across the park. The proposed development is in the backdrop of views of the church in the main approach form the Old Kent Road.
91. The application includes a Townscape Visual Impact Assessment (TVIA) and

includes Accurate Visual Renderings (AVRs) overlaid onto current photographs to demonstrate, from defined viewpoints, how the proposed development will appear in the context. These views help to understand the development in the round and have been used to assess the impact of the proposed development on the affected heritage assets.

92. In the TVIA the wider visual impact of the proposal is assessed and particular attention is paid to the visual impact on the immediately surrounding heritage assets as well as those that are visible from Burgess Park.
93. In this respect a series of dynamic views is presented along the axial route from the Old Kent Road where the development forms the immediate backdrop of the Grade II Listed former St Georges Church as well as the views from Addington Square CA, the Grade II Listed Limekiln.

#### Image – View from Burgess Park



94. The spire of the former church is the focus of the main pathway axis from the Old Kent Road where it forms a visual beacon helping to orientate visitors to the area and marking the main route across the park. Whilst this may not have been its historic purpose, its presence is recognised in the modern parkland setting and its location at the end of the park axis contributes positively to its significance.
95. The series of views submitted with the application (views A, B and G) demonstrate that the development is located to the left of the spire and, whilst it remains in the view for some of the 500m plus walk, it does not cause harm to the setting of the former church and generally remains subservient in the views disappearing from view as the viewer approaches the church.
96. The views also include the cumulative impact of the recently resolved to be consented and other applications in the Parkhouse Street area and these also demonstrate that the cumulative impact is not harmful with proposed buildings generally remaining subservient and stepping away from the spire, preserving its

prominent silhouette when viewed from the park.

97. In the remaining views from the park the TVIA demonstrates that it conforms to the principles set out in the LDS, forming a generally consistent 'shoulder' height at the edge of the park with taller elements (the subject of separate planning applications) set back and located towards the centre of the former industrial site.
98. In conclusion, where the impact of this proposal on the historic environment is concerned Officers are satisfied that there is no harm arising due to the visibility of the proposal from Burgess Park (including the lake and the Lime Kiln), Wells Way or Parkhouse Street itself. There is no direct impact on any listed buildings or conservation areas. Any harm arising due to visibility in the wider setting of heritage asserts is extremely limited and of the lowest order of Less than Substantial as defined by the NPPF and can be considered in the balance against the public benefits arising.
99. In these instances, decision-makers are advised by paragraph 202 of the NPPF to weigh "*any harm against the public benefits of the proposal including, where appropriate, securing its optimum viable use.*" In this case the contribution of the new public realm, the quality of design, and the inclusion of affordable housing and affordable workspace have been considered in the balance and found to be acceptable justification for the limited harm.

### **Trees and landscaping**

100. Policy G7 of the London Plan 'Trees and woodlands' states that development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed. Policy P61 of the Southwark Plan states that development must retain and protect significant existing trees. It states that development must retain and enhance the borough's trees and canopy cover.
101. Objections have been received that the site would not achieve the appropriate Urban Greening Factor (UGF) of 0.4 and that the tree on Parkhouse Street would be affected by the proposed development.
102. The site currently comprises hard landscaping consistent with its use as an industrial site and contains only two trees, one of which is protected by a Tree Preservation order (TPO) and another which is considered to be of poor quality. The opportunity therefore exists for significant improvements to be made in terms of soft landscaping and contribution towards urban greening.
103. The proposed development does not require the removal of any high value (Category A) trees. This has been achieved by offsetting the main building away from the TPO tree and the trees located off-site to the north. The removal of one low value tree (T2) is proposed due to its poor condition and to accommodate the new landscaping arrangement in this location. This is not considered to represent an arboricultural impact given the low value nature of tree. The proposed planting plan submitted separately as part of the application, proposes the planting of five new trees. The new trees would be located within internal terrace / courtyard spaces and to the south of the site on Parkhouse Street. This

demonstrates the potential to provide additional tree cover on the site as part of the proposed development compared to the existing scenario.

104. The arboricultural assessment suggests that the removal of three poor quality trees within Burgess Park, adjacent to the northern boundary of the site, would benefit other trees within that group by allowing them space to grow. These trees are not within the applicants control and officers do not support their removal. Works to these trees does not form part of this application and any potential future works to these trees will be the responsibility of Southwark Council.

Image - Landscaping



105. The planting of any trees in the pavement would need to be agreed with the council's highways development management team, and it is recommended that a clause be included in the S106 agreement requiring a bond of £6,000 per street tree which the council could use towards tree planting in the wider area in the event that not all of the street trees can be planted, or that any of them fail / die within a specified time period.

#### Landscaping

106. Policy G1 of the London Plan 'Green infrastructure' states that development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network. Green infrastructure is defined in the plan as comprising the network of parks, rivers, water spaces and green spaces, plus the green elements of the built environment such as street trees, green roofs and sustainable drainage systems. Policy G4 of the London Plan 'open space' states that development proposals should, where possible, create areas of publicly accessible open space, particularly in areas of deficiency.
107. The landscaping for the development would be focussed on the first floor communal roof terrace. This would comprise a soft landscaped space with seating and opportunities for child play. The orientation of the terrace is such that



it would benefit from morning and afternoon sun as well as benefitting from views out towards Burgess Park.

108. Private terraces are buffered with screens and raised planters to ensure residents of these units have security and privacy. Social seating spaces around planters are arranged to provide both secluded pocket spaces for residents wanting to relax and benches are located where parents and guardians can observe their children as they play. Sensory planting provides colour, texture and form within the raised planters, with vertical play elements along the front.

#### Urban Greening Factor

109. Policy G5 of the London Plan 'Urban greening' requires boroughs to develop their own urban greening factor (UGF) policies, and sets an interim target score of 0.4 for developments which are predominantly residential. Following the revisions to the scheme the proposed development would achieve a UGF of 0.4 through measures such as tree planting, green roofs and permeable surfaces. This would meet the London Plan target which is welcomed.
110. Overall, the existing site offers little greening and the proposed development would provide new green infrastructure, landscaping and tree planting which would be a positive addition to the streetscene and positive in terms of biodiversity and habitat creation.

#### **Affordable housing**

111. Objections have been received that there would be a lack of affordable housing. The proposed development would provide 40% affordable housing which would equate to 34 units and 115 habitable rooms. There would be a policy compliant tenure split of social rented and intermediate (London Living Rent) homes.
112. Section 5 of the NPPF sets out the government's approach to the delivery of significant new housing including a requirement for housing of different sizes, types and tenures to meet the needs of different groups. The supporting text to policy H4 of the London Plan 'Delivering affordable housing' sets out that there is a need for the provision of 43,500 affordable homes per year across London.
113. At borough level, strategic policy SP1 'Homes for all' of the Southwark Plan requires 2,355 new homes to be delivered per annum. Policy P1 'Social rented and intermediate housing' of the Southwark Plan requires developments of 10 or more residential units to provide a minimum of 35% affordable housing, comprising a minimum of 25% as social rented and the remainder as intermediate. This policy sets out that for affordable housing purposes a habitable room of up to 28sqm is counted as one habitable room, a room between 28.1-42sqm is counted as two habitable rooms and so on.

#### Affordable housing by habitable room

Unit type	Private market habitable rooms	Social rented habitable rooms	Intermediate habitable rooms	Total habitable rooms
Studios	8	0	0	8
1-bed	34	16	12	62
2-bed	66	36	12	114
3-bed	65	20	20	105
<b>Total</b>	<b>173 (60%)</b>	<b>72 (25%)</b>	<b>44 (15%)</b>	<b>289</b>

#### Affordable housing unit mix

Unit type	Social rented	Intermediate	Total
1-bed	8	6	14
2-bed	9	3	12
3-bed	4	4	8
<b>Total</b>	<b>21</b>	<b>13</b>	<b>34</b>

114. The quality of accommodation is considered in detail later in the report and the units have been designed to be tenure blind. In line with policy SP1 of The Southwark Plan the applicant can follow the Fast Track route and is not required to provide a viability assessment as the level of affordable housing provision is 40%. The level of affordable housing is in excess of the minimum 35% requirement and is considered to be a significant benefit of the scheme.
115. It is recommended that the S106 agreement includes clauses to monitor the provision of affordable housing, together with a monitoring fee of £132.35 per unit. This would ensure that the provision of the affordable homes can be monitored and they remain affordable in perpetuity. The clauses would require the developer to provide plans showing the location of the social rented and intermediate homes, to ensure the exact location of these homes are identified and can be monitored by the council.
116. The developer would be required to notify the council at several stages throughout the development, including at practical completion, to ensure that the council can check that the provision of the affordable homes is as approved. The developer would be required to provide the council with as-built plans of the development identifying the address (as approved by the street naming and numbering service) and tenure of each unit. The developer would also be required to allow the council access to the development with reasonable notice in order to verify the submitted plans.

### Mix of dwellings

117. Policy P2 of the Southwark Plan 'New family homes' requires a minimum of 60% of the residential units to contain two or more bedrooms with a mix of 2-bed 3 person and 2-bed 4 person homes, and a minimum of 25% of the units to contain three or more bedrooms in the Urban Zone. A maximum of 5% studio units is permitted and these can only be private units.

Unit type	Number of units	Percentage of units %
Studio	4	5%
1-bed	30	35%
2-bed	30	35%
3-bed	21	25%
Total	85	100%

118. The proposed unit mix would be fully compliant with the standards set out in the Southwark Plan.

### **Wheelchair accessible housing**

119. Policy D7 of the London Plan 'Accessible housing' requires residential development to provide at least 10% of dwellings to meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and for the remaining dwellings to meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. Policy P7 of the Southwark Plan requires the 10% to be based on habitable rooms rather than unit numbers. It also states that where those homes are affordable wheelchair user homes, 10% of the social rented homes must meet Building Regulations M4(3)(2)(b) standard (wheelchair accessible dwellings). It sets out larger minimum floor areas which wheelchair accessible dwellings must meet, and requires a mix of dwelling sizes and tenures that meet the above standards, including family homes. Two bedroom three person affordable wheelchair homes will not be acceptable.
120. The proposed development would provide 10% wheelchair adaptable units by habitable room, based on the overall habitable room calculations. This equates to 30 habitable rooms based on the total 289 habitable rooms across the scheme, provided by these units. This would include five two bedroom four person affordable units of which three are social rented and two are intermediate tenure, and the five private units (1B2P) which would all meet Building Regulations standard M4(3)(2)(b). Additionally, the wheelchair units would all meet or exceed the accessible wheelchair user housing minimum space standards set out in Policy P7 and the Residential Design Standards SPD.

### **Quality of accommodation**

121. Policy D6 of the London Plan 'Housing quality and standards' requires housing developments to be of high quality design and to provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.
122. Policy P15 of the Southwark Plan requires developments to achieve an exemplary standard of residential design, and sets out a number of criteria which must be met. The council's Residential Design Standards SPD establishes minimum room and overall flat sizes dependant on occupancy levels, and units should be dual aspect to allow for good levels of light, outlook and cross-ventilation.

123. Objections have been received that the proposed housing would be poor quality, under sized, poorly lit and with too many single aspect homes. These issues are considered below.

#### Unit sizes

124. The Residential Design Standards sets out the minimum unit sizes for new homes and these are set out in the table below alongside the range of provision for the new units.

125.

<b>Flats</b>	<b>SPD minimum sqm</b>	<b>Proposed unit sizes sqm</b>	<b>SPD amenity space minimum sqm</b>	<b>Amenity space proposed sqm</b>
Studio	37 or 39	37	10	8
1-bed	50	50-72	10	6-44
2-bed	61-79	71-91	10	7-25
3-bed	74-102	87-98	10	10.5-34

126. All of the residential units would meet or exceed the minimum overall floorspace requirements set out in the Nationally Described Space Standards, and they would all comply with the minimum room sizes set out in the SPD including storage requirements. They would also comply with new requirements set out in policy D6 of the London Plan 'Housing quality and standards'.

#### Internal daylight and sunlight

127. A daylight and sunlight assessment for the proposed dwellings has been submitted, based on the Building Research Establishment (BRE) Guidance. Average Daylight Factor (ADF) determines the natural internal light or day lit appearance of a room and the BRE guidance recommends an ADF of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens. No value is given for studios and given the shared living and sleeping spaces officers consider that 2% would be appropriate.
128. Annual Probable Sunlight Hours (APSH) should be considered for all windows facing within 90 degrees of due south (windows outside of this orientation do not receive direct sunlight in the UK). The guidance advises that windows should receive at least 25% APSH, with 5% of this total being enjoyed during the winter months.
129. ADF analysis shows that 212 of 242 rooms assessed (88%) will meet or exceed the recommended minimum values for their respective room type (1.5% for LKDs and 1% for bedrooms). The overall level of compliance would drop slightly to 82% in the cumulative condition which takes into account the developments that have been consented but not yet constructed. This represents a good level of compliance for an urban area. Of the 43 rooms that fall below the guidance in the cumulative condition, 41 either have a private balcony directly overhead which limits the availability of light or they have direct access onto a balcony, which provides additional outdoor amenity.

130. In terms of sunlight the applicant's report demonstrates that all units within the development will receive some sunlight and where sunlight is most restricted to the north of the scheme, the units will benefit from excellent views over Burgess Park. The submitted study shows that 66 of 95 rooms assessed (69%) in the proposed condition and 45 of 95 rooms assessed (47%) in the cumulative condition would meet the BRE Report guidance for sunlight, receiving at least 25% of available sunlight. Each unit benefits from a private balcony, a key benefit in an inner urban location such as this. A number of factors affect the amount of daylight and sunlight reaching the units, including the provision of balconies which can obstruct light to the windows below, proximity to other structures, and window sizes. In this instance the overall level of compliance and quality is considered to be acceptable and the new homes would be well lit.

#### Overshadowing

131. The applicant's assessment shows that over half of the first-floor communal courtyard would receive at least two hours of sunlight on 21 March, both in the proposed and cumulative conditions, exceeding the BRE's minimum recommendation for this assessment.

#### Privacy and overlooking

132. The council's Residential Design Standards SPD recommends a minimum of 21m between the rear elevation of properties, and a 12m separation distance between properties which face one another across a highway. The block is arranged as two connected blocks broadly in an 'H' shape. Home within opposing facades of the blocks benefit from at least 20 metres separation distance and as such would comply with the guidance.

#### Aspect and outlook

133. Policy P15 of the Southwark Plan 'Residential design' requires residential units to be predominantly dual aspect and allow for natural cross ventilation. In circumstances where due to site constraints it is impossible or impractical to provide dual aspect dwellings, it must be demonstrated how overheating and ventilation will be mitigated (this is considered later in the report). Single aspect dwellings will not be acceptable if they have three or more bedrooms, or are north-facing, or where the façade is exposed to high noise levels.
134. A high proportion of the units (86%) would be dual aspect. The remaining 21 units would be single aspect however they would have either east, south or west views and as such would benefit from good light levels. All single aspect units would be either studio accommodation or 1 bedroom units.

#### Amenity space and child playspace

135. Section 3 of the Residential Design Standards SPD sets out the council's amenity space requirements for residential developments. Flats should have a minimum of 10sqm of private amenity space, and any shortfall must be added to the communal provision. Policy D6 of the London Plan requires private outdoor amenity space to have a minimum depth and width of 1.5m, and this requirement

would be met. Policy P2 of the Southwark Plan requires family homes in apartment blocks to have direct access to outdoor amenity space and allow for oversight of children outside.

136. The GLA's playspace calculator sets out that the development would need to provide a total of 314sqm of child playspace broken down as follows:

Age group	Playspace requirement (sqm)
Under 5	145
5-11	106
12+	63

137. The applicant is proposing to provide the child playspace for the under 5 and 5-11 age group on site within the proposed first floor terrace in order that play can be supervised by parents and that children would be able to play in a safe, contained and secure environment. The first floor terrace is large enough to accommodate the required 251sqm of playspace for this age group.
138. Given that the site is immediately adjacent to Burgess Park, the applicant is proposing that the 12+ age group use the facilities designed for their age group within the park. Given the proximity of the site to the park and the site specific circumstances that prevent the 12+ age group from being accommodated on site, this proposal is considered acceptable subject to the provision of £10,350 towards play facilities within Burgess Park.
139. In terms of private amenity space, all units will benefit from balconies ranging from 6sqm to 44sqm. All three bedroom units would benefit from a balcony of at least 10sqm and as such complies with the SPD. Where one and two bedroom units do not benefit from a 10sqm balcony, the shortfall must be added to the communal amenity space requirement. The SPD requires 50sqm of communal amenity space and the balcony shortfall for this development equates to 172sqm. As such, private amenity space of 222sqm should be provided.
140. Given the site specific circumstances, including the requirement to re-provide the commercial floorspace and limit the height of the proposed building, it has not been possible to provide the communal amenity space shortfall in addition to the playspace. Officers have taken the view that the first floor terrace is suitable as a playspace and can also be used as an amenity space for residents as it will be a pleasant, green landscaped space. The proximity of the site to Burgess Park is such that residents can make use of this park as an amenity space and in line with the S106 and CIL SPD it is considered appropriate to secure a financial contribution to upgrading and improving Burgess Park. The SPD requires a payment of £205 per sqm shortfall and in this instance this would equate to £43,460 and this would be secured as part of the S106 agreement.
141. Overall it is considered that the quality of accommodation can be described as exemplary on balance. Whilst not every unit would comply with all of the exemplary criteria the majority would meet most if not all of those criteria. The Mayor's Housing SPG advises that a failure to meet one standard would not

necessarily lead to a failure to comply with the London Plan, but that a combination of failures would cause concern. All of the units would meet the minimum floorspace requirements and many would significantly exceed them. All of the wheelchair accessible units would meet the larger unit sizes and a significant majority of the units would be dual aspect and would comply with the BRE guidance for average daylight factor. All of the units would have private amenity space and the playspace for the 0-11 age group would be fully provided in site. The remaining play and amenity space requirements can be met within the adjacent Burgess Park subject to the SPD compliant financial contributions previously mentioned.

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

142. Policy P56 of the Southwark Plan states that development should not be permitted when it causes an unacceptable loss of amenity to present or future occupiers or users. Amenity considerations which will be taken into account include privacy and outlook, overlooking, smell, noise, vibration, daylight, sunlight and wind microclimate impacts. The adopted Residential Design Standards SPD expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.
143. Following consultation, neighbours expressed concern that they would be subjected to a loss of light, loss of privacy and increased noise. These issues are considered in more detail below.

#### Impact of proposed use

144. The proposed development would contain Class E floorspace and residential uses. Given the broad range of uses which Class E contains, a condition is recommended requiring the uses described in the application to be provided.
145. Policy P18 of the Southwark Plan 'Efficient use of land' states that development will be permitted which optimises land use, does not unreasonably compromise the development potential or legitimate activities on neighbouring sites, and provides adequate servicing facilities, circulation space and access to, from and through the site.
146. The proposed development would introduce residential properties in close proximity to existing industrial however, conditions have been included in the draft recommendation to ensure that the proposed dwellings would be adequately sound-proofed which would reduce the likelihood of noise complaints against existing businesses. It is noted that the site is allocated for redevelopment including residential uses in the Southwark Plan, and the proposed development would be consistent with this.

#### Privacy and overlooking

147. In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear. The proposed development would maintain or exceed the minimum distances as set out in the supplementary planning document and as such it is considered that there would be no significant adverse impact in terms of overlooking or loss of outlook.

#### Daylight and sunlight

148. Daylight and sunlight testing has been undertaken based on the BRE guidance. The BRE Guidance provides a technical reference for the assessment of amenity relating to daylight, sunlight and overshadowing. The guidance within it is not mandatory and the advice within the guide should not be seen as an instrument of planning policy. The guidance notes that within dense urban environments a higher degree of obstruction may be unavoidable to match the height and proportion of existing/consented buildings. This site benefits from an allocation in the Southwark Plan that indicates that the use of the site could be intensified.
149. The BRE sets out the detailed daylight tests. The first is the Vertical Sky Component test (VSC), which is the most readily adopted. This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27% which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by about 20% of their original value before the loss is noticeable.
150. The second method is the No Sky Line (NSL) or Daylight Distribution (DD) method which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of 20% in the area of sky visibility, daylight may be affected.

#### Impact on existing properties and spaces

151. The daylight and sunlight assessment considered the potential impact on the following existing buildings:
- 1-13A Parkhouse Street
  - 59 Wells Way
  - 61-67 Wells Way
  - 69-75 Wells Way
  - Former Church of St George Housing Co-op
152. These properties would satisfy the preliminary 25-degree line test recommended by the BRE Report. As such, there is unlikely to be an adverse effect on the diffuse skylight and sunlight enjoyed by these properties and detailed analysis is not required. As such there would be no significant daylight or sunlight impacts



on any existing residents as a result of the proposed development. Therefore, analysis is limited to assessing overshadowing on Burgess Park and the lands surrounding the former Church of St George.

153. Using the Sunlight Hours On Ground test, analysis shows that the grounds of the former Church of St George would see no change in the area receiving a minimum of 2 hours sunlight on 21 March and would remain BRE compliant. Overshadowing from the development would only affect the southern edge of Burgess Park. The area of Burgess Park bound by New Church Road and Wells Way would see no change in the 98% of its area receiving a minimum of two hours sunlight on 21 March, between the existing and the proposed conditions. When looking at the impact of the proposed development alongside the consented schemes, there would be a marginal reduction of 3% to the area of the park directly north of 25-33 Parkhouse Street and the application site, it would however remain compliant with the BRE.
154. In terms of transient overshadowing, this would be limited to the area immediately to the north of the site, between New Church Road and Wells Way. The scheme has been reduced in height since originally submitted and the shadow path is less pronounced than that of the consented schemes 25-33 and 21-23 Parkhouse Street. In the summer months, when the park is used more intensely, assessment on 21 June shows that the development shadow would match the existing shadow of the two-storey warehouse and subside by mid-afternoon.

#### Impact on proposed properties and spaces

155. The daylight and sunlight assessment has considered the impact of the proposal on the consented developments on the following sites:
- Block B, C, D, F, G, H and K – Camberwell Union
  - 21-23 Parkhouse Street
  - 25-33 Parkhouse Street
156. Blocks B-D, G, H and K of the Camberwell Union scheme and the development at 21-23 Parkhouse Street all pass the preliminary BRE 25 degree test and as such are not considered to be significantly impacted by the proposed development.

#### Block F Camberwell Union

157. This approved seven storey block would be located directly south of the site across Parkhouse Street. Given the building's orientation, there would be no effect on sunlight to this scheme from the proposed development.
158. In terms of VSC, 118 windows have been tested and 81 would continue to meet the BRE standards with the proposed development in place, equating to 69% compliance. Of the remaining 37 windows, 23 are bedroom or secondary windows located underneath balconies or within recessed parts of the façade which the BRE acknowledges can make VSC reductions unavoidable. It should

be noted that all but one rooms with one or more windows that would see impacts contrary to the BRE would exceed the standards for ADF. A total of 47 of 55 rooms assessed for ADF would continue to meet the BRE standard and this equates to 85% compliance. It is considered that the development would not have a significant impact on Block F of the Camberwell Union development.

#### 25-33 Parkhouse Street

159. This consented development lies immediately to the east of the application site and includes buildings up to 12 storey's in height with commercial use on the ground floor which is the equivalent of two storeys in height. Residential use would be located on all upper levels.
160. Using the VSC test, 264 of the 303 windows tested (87%) would meet or exceed the BRE standards. Of the remaining 39 windows, 16 are one of a double set of windows or secondary windows that serve a living space. In each case the main window or remaining window in the set would continue to meet the VSC criteria. The remaining 23 windows serve bedrooms which are less sensitive to daylight reductions, a fact acknowledged by the BRE guide. As for ADF, 187 of the 190 rooms tested would continue to meet the BRE standards and this would equate to 98% compliance.
161. In terms of sunlight, the analysis has been limited to those windows that face within 90 degrees of due south. Of the 134 rooms tested, 128 would remain compliant (96%). Analysis of the proposed communal gardens within 25-33 using the SHOG test, shows there would be no effect on those areas receiving a minimum 2-hours sun-on-ground on a typical 21 March.

#### External lighting

162. External lighting has been designed in order to ensure safety, security and appropriate site coverage whilst minimising light spillage to adjacent properties and Burgess Park. The lighting scheme is considered to be appropriate and would not have any nuisance impacts on the adjacent scheme or the parkland.

#### Noise and disturbance

163. Demolition and construction works can lead to an increase in noise and disturbance which to some extent is inevitable in order to bring forward development. However, subject to appropriate conditions and the approval of detailed management plans, these potential impacts can be suitably mitigated in order to minimise any potential adverse impacts. The relevant conditions would be attached to any consent issued.

#### Conclusions on amenity

164. As set out above, it is considered that the proposed development would not result in any significant loss of amenity to neighbouring properties or compromise the continued use of the neighbouring industrial units. It is also concluded that there

would be no significant adverse impacts upon the quality of residential accommodation which is proposed/consented on some of the neighbouring sites.

## Ecology

165. Burgess Park which adjoins the rear of the site is a borough level site of importance for nature conservation (SINC). The area of the park which immediately adjoins the site is identified as the New Church Road Nature Area which forms part of the wider SINC designation and is one of the most important habitats in the park. The council has recently completed a £3 million improvement project to remove the redundant New Church Road and undertake habitat improvements in this area. This includes incorporating a finger of land in the nature area which was formerly part of application site as shown on the image below. The council purchased this piece of land and in 2018 the hardstanding was removed and new planting undertaken. The nature area now contains semi-natural broadleaved woodland interspersed with areas of grassland, and includes features such as bird and bat boxes and bug hotels.
166. Policy G6 of the London Plan 'Biodiversity and access to nature' states that SINC's should be protected. Where harm to a SINC is unavoidable and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the policy sets out a mitigation hierarchy which must be followed. The policy states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
167. At borough level policy P60 of the Southwark Plan 'Biodiversity' states that development must contribute to net gains in biodiversity including through enhancing the nature conservation value of SINC's, protecting and avoiding damage to SINC's, protected species and habitats, and including features such as green and brown roofs, green walls and soft landscaping.
168. The applicant has submitted an updated Preliminary Ecological, Bat Roost and Biodiversity Net Gain Assessment. A number of objections have been received raising concerns about ecology and impact on the park. The site is currently almost fully occupied by buildings and hardstanding with a high brick boundary wall onto the park edge. The brick boundary wall to the park would be retained and a five metre buffer would be maintained between the new building and the park edge as requested by the council's parks department. No new entrances are proposed from the site directly into Burgess Park and this is also supported as it will ensure minimal impact on the SINC from potential increased use/footfall.
169. The applicant's biodiversity report sets out that there would be a 95.19% biodiversity net gain as a result of the proposed development and this is fully supported by the council's ecology officer. The following enhancements are set out below:

- The proposed development will include a native green roof, new tree planting, sedum garden planting, native shrub and ornamental shrub planting.
- Instalment of bat and bird boxes either integrated into or hung on the new building to provide additional roosting and nesting opportunities on-site. This in in line with the Southwark and Greater London Biodiversity Action Plans;
- Implementation of bug hotels within the green roof and use of bee bricks within any walls constructed, to provide new opportunities for invertebrate species, in line with the Southwark and Greater London Biodiversity Action Plans;
- Use of native species where possible and reducing the use of non-native species in the landscape designs to provide new opportunities for fauna; and
- Instalment of swift boxes on higher floors in order to provide new habitat for bird species using high rise buildings to roost and nest.

170. Several objections set out the cumulative concerns regarding impacts from the four Parkhouse Street schemes on the nature area. As part of the consultation response on the approved scheme at 25-33 Parkhouse Street, The Friends of Burgess Park (FOBP) commissioned the London Wildlife Trust (LWT) to prepare a report considering the cumulative impacts. This report was been submitted to the council and reviewed by officers including the council's ecology officer.
171. The LWT report considers two areas of woodland within the park, and the closest to the application site is described as the Southampton Way woodlands which adjoins the rear of the site. The report concludes that Burgess Park is of borough level importance rather than local importance, that cumulatively lighting from the different developments would affect bats, breeding birds and moths, that cumulative overshadowing could result in a prevalence of more shade tolerant species to the detriment of grassland areas, and that insufficient information has been provided to enable the council to determine this application.
172. The council commissioned an independent ecology report prepared by an external ecologist to assess the cumulative ecological impacts of the four proposed developments which would adjoin the park. The report considers cumulative construction impacts, overshadowing, increased recreational pressure and light spillage.
173. With regard to overshadowing, the report concludes that the area of woodland which would experience increased shadowing is broadly the area which supports the lowest understorey diversity. Whilst some disturbance upon the woodland is therefore possible, it is not considered likely that this would significantly impact the conservation status of the New Church Road Nature Area or Burgess Park as a whole, nor would it likely impact bird, bats or invertebrates. The greatest overshadowing impact is predicted for the winter months when trees and most flora are dormant. The woodland understory is not of sufficient diversity or structure for the additional shadowing to be considered significant in ecological terms i.e. any change to the woodland community would not affect its conservation status or ecological functionality given the site's urban location, existing level of disturbance, and the presence of common species. It is therefore concluded that any impact would not be significant.

174. As for potential impacts upon birds and bats, the report concludes that without mitigation there could be temporary impacts arising from construction, and permanent local impacts including from lighting and increased use of the park. Mitigation is recommended through a construction environmental management plan to include measures to minimise disturbance during demolition and construction, lighting controls, landscaping within the sites supported by landscape and habitat management plans, and enhanced opportunities for ecology and biodiversity on the sites through the provision of living roofs and appropriate planting. All of these matters would be secured by way of conditions and s106 obligations. As the bat surveys have been updated within the past year, it is not considered necessary to repeat them.
175. To mitigate increased use of the park, the report suggests that the developments coming forward provide an opportunity for the creation of a small strategic habitat bank in the park, which the developments adjoining the park could fund. This could be in the form of new meadow planting, bird and bat boxes, insect hotels and stag beetle loggeries. To this end and in consultation with the council's Ecology Officer a contribution of £40,770 should be secured through the s106 agreement towards habitat creation in Burgess Park, and this is based on the amount of floorspace proposed and includes provision for monitoring and maintenance.

## **Transport**

176. Chapter 9 of the NPPF seeks to ensure that transport issues are properly addressed as part of development proposals. Proposals must assess the impact upon existing transport networks, promote and maximise opportunities for sustainable transport modes whilst mitigating any adverse transport related environmental effects and must make a significant contribution to improving accessible movement and permeability as a key priority for place making. Paragraph 111 states "development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe".
177. This approach is reflected in Chapter 10 of the London Plan and Southwark Plan Policies P49 – P55, which require development proposals to maximise sustainable modes of transport by minimising car journeys, to deliver enhanced walking and cycling opportunities and safe, accessible routes to public transport. Developments should be car free save for disabled parking provision and mitigation will be secured where necessary to address impacts upon the road and public transport networks to serve new developments.
178. Objections have been received that the development would lead to increased local parking pressures, increased use of public transport and that insufficient cycle parking would be provided. These issues are considered in more detail below.
179. The site has a Public Transport Accessibility Level (PTAL) of 2 (low), although the applicant considers that a PTAL score of 4 (medium) would be more representative. Parkhouse Street is a single carriageway road which operates as a one-way street from Wells Way to the east linking with Southampton Way to

the west. It is located in a Controlled Parking Zone (CPZ) which operates Monday to Friday 8.30am to 6.30pm. The nearest bus stop is approximately 150m from the site on Wells Way which is served by the 136 and 343 bus routes. There are some on-street pay and display spaces on Parkhouse Street (maximum stay 2 hours).

#### Access and servicing

180. Pedestrian access into the employment space would be from Parkhouse Street as well as from within the eastern yard. The two residential lobbies could be accessed from the Parkhouse Street entrance or from the lobby entrances within the eastern yard. The development would be serviced off-street from within the eastern yard where there would be adequate room and visibility to safely turn a vehicle. It is recommended that a condition be imposed to secure adequate visibility splays onto Parkhouse Street,

#### Trip generation

181. Concerning the vehicle movements emanating from this development proposal, the Transport Officer has reviewed the applicant's Transport Assessment and has undertaken a review of the TRICS database which demonstrates that the residential aspect of this development would generate 21 two way vehicle movements in the morning or evening peak hours while the commercial element would produce 11 in each of these periods. Overall, it is projected that this development would produce some 32 two-way vehicle movements in the morning or evening peak hours, which when offset against the estimated two two-way vehicle movements in the morning or evening peak hours for the present industrial buildings on this site, means that it would create 30 additional two way vehicle movements in the morning or evening peak hours. It is also estimated that this proposed development would produce 26 two way service vehicle movements per day. Taking into account the likely vehicle movements from the adjacent consented developments, the forecasted supplementary vehicle movements would not have any noticeable adverse traffic impact on the surrounding roads.
182. The applicant's consultants have projected that this development would create an estimated 33 two way public transport trips in the morning or evening peak hours which is deemed reasonable. It is considered that the applicant should make a contribution of £77,273 to bus improvements in the area and this should be secured in the S106 agreement.

#### Car parking

183. With the exception of three wheelchair accessible parking spaces (two residential and one commercial), the development would be car-free. As the site is located in a controlled parking zone (CPZ), a planning obligation preventing future occupiers of the development from being able to obtain parking permits is recommended. An amendment to the Traffic Management Order would be required to enable the relocation of parking bays on Parkhouse Street and this should be secured through the s106 agreement.

Car club

184. Policy P53 of the draft NSP 'Car parking' requires developments to provide a minimum of three years free membership, per eligible adult who is the primary occupier of the development, to a car club if a car club bay is located within 850m of the development; and / or contribute towards the provision of new car club bays proportionate to the size and scale of the development if it creates 80 units or more.
185. There is a car club bay on Sam King Walk which is approximately 180m to the west of the site therefore a planning obligation is required to secure car club membership in accordance with the above policy.

Cycle parking

186. A total of 136 long stay and nine visitor cycle parking spaces would be provided for the residential aspect of the proposal. The commercial units would benefit from five long stay spaces and five visitor spaces. The level of cycle parking being proposed would be compliant with both London and Southwark Plan policies.
187. The TfL cycle hire scheme does not currently extend into the area, although TfL are seeking to expand it and a contribution of £33,000 towards this should be secured through the s106 agreement. This would be in accordance with policy P52 of the Southwark Plan. If the scheme is extended into the area prior to the occupation of the development the s106 agreement would also secure two years' free cycle hire business accounts for commercial occupiers and two years' free cycle hire membership per household for the residential units.
188. Regarding transport impacts, the site layout and servicing arrangements are considered to be acceptable and no adverse impacts are anticipated. The cycle parking arrangements would be acceptable and would comply with both the London Plan and Southwark Plan policies. Planning obligations would secure contributions towards various transport measures including improvements to bus facilities, the cycle hire scheme, and the provision of car club membership. Overall the transport impacts of the proposed development are considered to be acceptable.

**Air quality**

189. The site sits within an air quality management area. Policy SI 1 of the London Plan 'Improving Air Quality' seeks to minimise the impact of development on air quality, and sets a number of requirements including minimising exposure to existing poor air quality, reducing emissions from the demolition and construction of buildings, being at least 'air quality neutral', and not leading to a deterioration in air quality.
190. An air quality assessment has been submitted with the application which assesses the impact of the proposed development on air quality during the construction and operation of the development. It advises that the main construction impact relates to dust and that measures would need to be put in place to minimise this. The assessment concludes that future users of the site

are unlikely to be exposed to poor air quality.

191. The proposed development is expected to generate road traffic volumes below the relevant EPUK/IAQM screening criteria. As such, road traffic impacts associated with the operation of the proposed development can be considered as having an insignificant effect on local air quality. The development would be considered air quality neutral.

### **Flood risk**

192. Policy SI 12 of the London Plan 'Flood risk management' states that development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Policy P68 of the Southwark Plan 'Reducing flood risk' states that development must not increase flood risk on or off site and sets out the requirements for achieving this. This includes that finished floor levels are set no lower than 300mm above the predicted maximum water level where they are located within an area at risk of flooding.
193. The site is located in Flood Zone 3 as identified by the Environment Agency flood map, which indicates a high probability of flooding. Paragraph 159 of the NPPF advises that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. In line with the NPPF, the council has a Strategic Flood Risk Assessment which acknowledges that development within flood zone 3 is required, and is allowed with the application of the exception test set out the NPPF.
194. Paragraph 163 of the NPPF states that the need for the exception test will depend on the potential vulnerability of the site and of the proposed development, in line with the flood risk vulnerability classification set out in national planning guidance. The development would contain residential units from first floor level upwards which are classified as more vulnerable uses under the NPPF.
195. For the Exception Test to be passed it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, and that a site-specific flood risk assessment must demonstrate that no adverse impacts would occur. Where planning applications come forward on sites allocated in the development plan through the sequential test, applicants need not apply the sequential test again. However, the exception test may need to be reapplied if relevant aspects of the proposal had not been considered when the test was applied at the plan-making stage, or if more recent information about existing or potential flood risk should be taken into account.
196. The site is located on previously developed land and there are strong sustainability reasons why it should be redeveloped. The development of brownfield sites such as this will be necessary if accommodation is to be provided to meet the current shortfall in housing in the area. The site is allocated for mixed-use development including housing in the Southwark Plan, and the proposed design is capable of providing good quality housing, with less vulnerable



commercial space at ground level and no residential units below first floor level.

197. The applicant has submitted a Flood Risk Assessment which has been reviewed by the Environment Agency who have raised no objection to the proposal subject to conditions.

### **Sustainable development implications**

198. Chapter 9 of the London Plan deals with all aspects of sustainable infrastructure and identifies the reduction of carbon emissions as a key priority. Policy SI2 requires all developments to be net zero carbon with a minimum onsite reduction of 35% for both commercial and residential. Non-residential development should achieve 15 per cent reduction through energy efficiency measures. Where developments are unable to meet net zero carbon targets any shortfall between the minimum 35% and zero carbon must be mitigated by way of a payment towards the carbon offset fund. The energy strategy for new developments must follow the London Plan Hierarchy (be lean/ be clean/ be green/be seen) and this must be demonstrated through the submission of an energy strategy with applications and post construction monitoring for a period of five years.
199. Southwark Plan Policies P69 and P70 reflect the approach of the London Plan by seeking to ensure that non-residential developments achieve a BREEAM rating of 'Excellent' and include measures to reduce the effects of overheating using the cooling hierarchy. The policies reflect the London Plan approach of 'lean, green and clean' principles and requires non-residential buildings to be zero carbon with an onsite reduction of at least 40%. Any shortfall can be addressed by way a contribution towards the carbon offset green fund. The energy hierarchy is as follows:
- Be lean – use less energy
  - Be clean – supply energy efficiently;
  - Be green – use renewable energy;
  - Be seen – monitor, verify and report on energy performance

#### Be Lean

200. In accordance with London Plan policy SI-2, the energy strategy prioritises the 'Be lean' category of the energy hierarchy, with heat demand reduced to such an extent that there would be no demand for heat from a centralised system within the site or from off-site networks. Energy efficiency measures include:
- Efficient fabric to reduce heating and cooling demand
  - Appropriate glazing ratios and deep window reveals to reduce risk of overheating in summer and reduce heat loss in winter.
  - Enhanced airtightness that reduces infiltration heat losses.
  - Providing energy efficient heating cooling and mechanical ventilation plant.
  - Providing energy efficient lighting.
  - Providing adequate control of building services systems and lighting systems.
  - Providing training to building users to enable them to utilise the building efficiently.

201. Measures under this category would result in a 14% reduction in carbon emissions, with 12% for the residential units and 24% for the commercial space which would exceed the 10% and 15% requirements set out in the London Plan.

#### Be Clean

202. The proposed development would not achieve any carbon savings under this category because it proposes individual heating systems to the flats and commercial units rather than a site-wide communal system.

#### Be Green

203. Heating and hot water for residential apartments will be met via an exhaust air source heat pump, ventilation will be provided through an efficient MVHR with openable windows for additional ventilation in summer. Heating and cooling for office areas will be provided by refrigerant-based simultaneous heating and cooling 'variable refrigerant flow' systems, comprising of external air source heat pump units and internal fan coil units. The MVHR system will provide ventilation to the office areas. A photovoltaic cell system that generates at least 13 MWh of electricity per year will be installed. This can be achieved with 75 m<sup>2</sup> PV lying at 35 degrees on the south facing pitched roof. The PV array will contribute to site wide carbon emission reductions and will be used by the non-domestic development.
204. Measures under this category would result in a 35% reduction in carbon emissions, with 35% for the residential units and 34% for the commercial space

#### Be Seen

205. London Plan policy SI2 sets out an additional stage of the energy hierarchy, 'Be Seen'. This stage requires the calculation of the operational energy in detail design stage, monitoring, verification and reporting of energy performance throughout the construction and usage of the building for the first 5 years. The development commits to disclosing in-use energy consumption data to the GLA for a minimum of 5 years post construction. To allow monitoring, verification and reporting of energy performance, the following sub-metering strategy has been developed:

**Electricity:** Utility meters are to be provided for:

1. Each dwelling
2. Each commercial tenant
3. Landlord supply. This is to be sub-metered in accordance with CIBSE TM39, with submetering for:
  - a. Lighting
  - b. Small power
  - c. Major plant items

**Water:** Utility meters are to be provided for:

1. Each dwelling
2. Each commercial tenant
3. Landlord CAT-5 supply for wash down

Circular economy

206. Policy SI 7 Reducing Waste and Supporting the Circular Economy of the London Plan requires referable applications to promote circular economy outcomes and aim to be net zero-waste.
1. How all materials arising from demolition and remediation works will be re-used and/or recycled.
  2. How the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life.
  3. Opportunities for managing as much waste as possible on site.
  4. Adequate and easily accessible storage space and collection systems to support recycling and re-use.
  5. How much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy.
  6. How performance will be monitored and reported.
207. This development supports London's transition to a low carbon circular economy, the following circular economy principles will be investigated:
- Retaining and reusing materials;
  - Building in layers;
  - Designing for disassembly- through the use of mechanical rather than adhesive connections;
  - Allow space for easy maintenance and replacement of building elements – optimising building longevity and allow for simple material reclamation at the end-of-life; and
  - Implementing material passports for elements of the building to improve the ability of disassembled elements to be reused.

208. Further details of circular economy will be secured as part of the S106 agreement.

BREEAM

209. Southwark Plan Policies P69 requires the development to achieve BREEAM 'excellent'. A BREEAM pre-assessment has been undertaken estimating that seven credits could be achieved which would equate to BREEAM Outstanding. As such an appropriate condition should be imposed on any consent issued in order to secure this standard.

Conclusion on energy strategy

210. The proposed energy strategy would achieve an on-site reduction in carbon emissions of 49% beyond the building regulations, significantly exceeding the 35% London Plan requirement. It would achieve a 14% reduction under the 'be lean' stage for residential uses and 24% for the non-residential uses, also exceeding the 10% and 15% requirements set out in the London Plan. Whilst it would not meet the Southwark Plan policy of 100% on-site savings, there is no

scope to provide further PV on the building. A financial contribution of £151,032 should be secured in the S106 Agreement in order to achieve carbon zero status for the development.

## **Fire safety**

211. Policy D12 of the London Plan (Fire Safety) requires all development proposals to achieve the highest standards of fire safety. All development proposals must be accompanied by a fire statement, i.e. an independent fire strategy produced by a third party, suitably qualified assessor.
212. A fire safety statement has been submitted which has been prepared by fire engineers on behalf of Jensen Hughes by appropriately qualified engineers. The Fire Safety Statement details the safety systems that would be employed on site such as fire detection alarms and sprinklers. In terms of evacuation in event of a fire, the residential part of the building will follow a stay put strategy, where only the apartment on fire evacuates. Provisions to provide dignified means of escape for all occupants will be provided in line with the London Plan D12 policy. The residential core corridors would be smoke vented. Fire engines would be able to enter and exit the site in a forward gear and vehicle tracking has been submitted demonstrating this.
213. The building has a top floor height greater than 18m. Therefore, a firefighting shaft will be provided comprising the following:
- Firefighting stair at least 1.1m clear width. Firefighting lift opening within 7.5m of the entrance to the firefighting stair.
  - 2 hours fire resisting enclosure to the stair and firefighting lift
  - Dry fire main outlet within the stair enclosure with an outlet at every level.
  - Automatically opening vent at the head of the stair achieving at least 1m<sup>2</sup> in cross-sectional area.
214. Although the Health and Safety Executive (HSE) is not a statutory consultee for this application because it was submitted before 1 August 2021, they were consulted but declined to make comments.

## **Digital connectivity**

215. London Plan Policy SI6 introduces the need for new developments to address London's requirements for enhanced digital connectivity. The policy requires development proposals to ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users, to meet expected demand for mobile connectivity generated by the development, to take appropriate measures to avoid reducing mobile connectivity in surrounding areas, and to support the effective use of rooftops and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure. This is repeated through policy P44 of the Southwark Plan 'Broadband and digital infrastructure'.
216. In order to address this requirement a condition is recommended to ensure that the appropriate ducting for future connection to the full fibre infrastructure would be installed within the proposed development.

## Planning obligations (S.106 agreement)

217. Policy DF1 of the London Plan advises that Local Planning Authorities should seek to enter into planning obligations to avoid or mitigate the adverse impacts of developments which cannot otherwise be adequately addressed through conditions, to secure or contribute towards the infrastructure, environment or site management necessary to support the development, or to secure an appropriate mix of uses within the development. Policy IP3 of the Southwark Plan sets out similar requirements, and further information is contained within the council's adopted Planning Obligations and Community Infrastructure Levy SPD.

<b>Planning obligation</b>	<b>Mitigation</b>	<b>Applicant's position</b>
Affordable housing	40% by habitable room, to be completed and made available before more than 50% of the private units can be occupied	
Affordable housing monitoring fee	£4,500	
Affordable housing monitoring clauses	As set out earlier in this report	
Affordable housing review mechanism	Early and late stage review mechanisms up to 50% affordable housing	
Employment during construction	20 sustained jobs for unemployed borough residents, 20 short courses and 5 construction industry apprenticeships, or a payment of £96,500 for shortfall, and the associated employment, skills and business support plan	
Employment within the completed development	Not required for a development of this size.	
Local procurement	During construction	
Delivery of the employment space	Employment space in each phase to be delivered before any of the residential units in	

	that phase can be occupied.	
Delivery of 10% affordable workspace	In accordance with the terms provided earlier in the report.	
Provision of a workspace marketing and management plan / strategy	To ensure that the workspace would be properly marketed and managed	
Post-completion monitoring of the affordable workspace	Terms to require monitoring of the space to be submitted to the council.	
Ecology contribution	£40,770 towards the creation of new habitat in Burgess Park.	
Burgess Park play space and amenity space contributions	£10,350 and £43,460 respectively.	
Carbon offset fund	£151,032	
Street tree bond	£5,000 per tree in the event that the proposed street trees cannot be planted or die and new trees need to be planted.	
Highway works	Adoption of a strip of land between the public highway and the proposed building which currently does not form part of the public highway; Amendment to the existing Traffic Management Order to reposition on-street parking spaces;  S278 agreement to complete the following: Pre-commencement highways condition survey Repave the footway including new kerbing fronting the development on	

	<p>Parkhouse Street (precast concrete slabs and 150mm wide granite kerbs)</p> <p>Construct vehicle crossover on Parkhouse Street to current standards</p> <p>Reinstate redundant vehicle crossover on Parkhouse Street as footway</p> <p>Install 4 street trees on the footway</p> <p>Repair any damages to footways, kerbs, inspection covers and street furniture within the vicinity of the development due to construction activities</p>	
Raised table and resurfacing on Parkhouse Street	£35,000	
Reconstruction of footway adjacent to site	£5,040	
Delivery service plan bond	£9,806	
TfL bus contribution	£77,273	
TfL cycle hire contribution	£33,000 towards a cycle hire docking station in the vicinity of the site in the event that the cycle hire zone is agreed to be extended into Camberwell within 2 years of the occupation of the development	
TfL cycle hire membership	Two years free cycle hire business accounts for commercial occupiers and 2 years free cycle hire membership per household for the residential units.	
Car club membership	Three years' membership for each eligible resident within the development including the commercial occupiers.	

Parking permit exemption	Future residents and businesses would be prevented from obtaining parking permits for the surrounding streets	
Future-proofing for district heating network	To enable the development to connect to future district heating networks if deemed feasible	
Post-installation review of energy measures installed	Review to verify the carbon savings delivered with an adjustment to the carbon offset green fund contribution if required.	
Total financial contributions	£ 505,021 (equivalent - excludes servicing monitoring fee)	
Administration and monitoring fee (excluding affordable housing monitoring fee and servicing bond)	£9,814	
Grand total	£514,835	

218. In the event that an agreement has not been completed by 31 December 2022, the committee is asked to authorise the director of planning and growth to refuse permission, if appropriate, for the following reason:

In the absence of a signed S106 legal agreement there is no mechanism in place to mitigate against the adverse impacts of the development including through contributions, and it would therefore be contrary to policy DF1 'Delivery of the Plan and Planning Obligations' of the London Plan 2021, Policy IP3 'Community Infrastructure Levy (CIL) and Section 106 planning obligations' of the Southwark Plan 2022, and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015).

Mayoral and borough community infrastructure levy (CIL)

219. 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 invests in London as a whole, primarily Crossrail. Southwark's CIL will provide for infrastructure that supports growth in Southwark



220. The site is located within Southwark CIL Zone 3 and MCIL zone 2 £60/sqm. Based on the floor areas provided in the applicant's CIL Form and Accommodation Schedule, the gross amount of CIL is approximately £711,360, including £449,280 of Borough CIL and £ 262,080 of Mayoral CIL. It should be noted that this is an estimate, and the floor areas on approved drawings and relief eligibility would be checked when the related CIL Assumption of Liability Form and CIL relief forms are submitted, after planning permission has been obtained.

### **Community involvement and engagement**

221. A Statement of Community Involvement (SCI) and engagement summary template have been submitted with the application, detailing the pre-application consultation undertaken with key stakeholders and the local community prior to the submission of the planning application.
222. The SCI advises that the approach to the pre-application consultation was to provide detailed information about the proposed redevelopment scheme to key stakeholders and the local community, in order to answer questions about the proposals and provide reassurance that key issues that may affect the local community have been addressed as part of the development of the proposals. A range of communication methods were utilised to provide information and to give people the opportunity to get in touch to provide feedback. These methods included:
- Holding 16 one-to-one meetings with key stakeholders to explain the proposals and to receive feedback;
  - Holding a two-day public exhibition to give people the opportunity to view the initial plans and discuss the proposals with the Applicant and the project team that was attended by 36 people.
  - Holding a further two-day public exhibition to give people the opportunity to view the revised plans and discuss the proposals with the Applicant and project team that was attended by 23 people.
223. Following the initial statutory consultation exercise undertaken by the council, the applicant was advised to revise the scheme. In effect, the proposed development was completely re-designed as follows:
- A reduction in the number of homes proposed from 100 to 85 (an overall reduction of 15 homes), with 40% to be secured as affordable housing (based on habitable rooms).
  - An increase in dual aspect or single aspect south, east and west facing from 76% to 87%.
  - A reduction in the overall height and massing of the proposals compared to the previously submitted proposals, to a six-storey shoulder in accordance with the aspirations of the Local Development Study (LDS) with a pop up seventh floor.
  - Further setbacks from Burgess Park boundary with no balconies projecting into 5 metre ecological buffer zone.
  - 10% wheelchair adaptable homes retained.

- Building set back further from Parkhouse Street to provide a more generous street.
- Play space enlarged with a better outlook onto Burgess Park and
- A retention of the re-provided commercial high quality floorspace.

224. In order to explain these changes to key stakeholders and the local community, a series of meetings were arranged with stakeholders to explain the changes and receive feedback. In addition to these meetings the Applicant has also been in correspondence with Peachtree Services Limited, the owner of the Burgess Business Park and Joseph Homes, the owner of 25-33 Parkhouse Street to ensure the developments are brought forward corroboratively in line with the LDS aspirations of the council.
225. As part of its statutory requirements the Local Planning Authority sent letters to surrounding residents, displayed site notices in the vicinity, and issued a press notice publicising the planning application. Adequate efforts have, therefore, been made to ensure the community has been given the opportunity to participate in the planning process. Details of consultation and any re-consultation undertaken by the Local Planning Authority in respect of this application are set out in the appendices.

## **Consultation responses from external and statutory consultees**

### Environment Agency

226. No objections subject to appropriate conditions.  
**Response** – Noted and agreed, the relevant conditions would be attached to any consent issued and continue to be relevant to the revised scheme.

### Greater London Authority

227. When originally submitted, the application proposed a building that was in excess of 30 metres in height and as such was considered to be a referable application in line with the Mayor of London Order 2008. As such, the GLA were consulted on the application and offered a Stage I response. Subsequent to that, the applicant completely redesigned the scheme in order to address concerns raised as part of the overall consultation process and to respond to the LDS. The revised scheme included a reduction in height, reduction in the number of homes, increased proportion of affordable housing and a new design/layout. The revised scheme was reduced in height to approximately 27.23 metres and as such was no longer a referable application. The GLA advised the council of this as part of the re-consultation on the revised scheme and the application was withdrawn from the referral process. The GLA are no longer a consultee on the application and should consent be granted, the application will not need to be referred to the GLA prior to issuing a decision.

### Health and Safety Executive

228. The Executive became a statutory consultee on 1 August 2021. As such, they consider that they cannot comment on planning applications from local planning authorities submitted, prior to that date. Therefore, on this occasion they will not be able to provide a response to this application.

**Response** – Noted.

London Fire and Emergency Planning Authority

229. An undertaking should be given that access for fire appliances as required by Part B5 of the Building Regulations will be provided.

**Response** – Noted and agreed, this would be secured by condition on any consent issued.

Metropolitan Police

230. With regards to the revised scheme, concerns have been raised that the cycle store would be open and visible once past the initial secure entry and additional concerns have been raised about the covered area to the front of the development. Otherwise, the scheme could achieve Secure by Design and a condition is recommended to achieve this.

**Response** – The cycle store could be further subdivided internally and the final layout and design of the cycle store would be reserved by condition. The covered area to the front of the development is very limited and once this development and surrounding developments are completed, Officers consider that there would be sufficient natural surveillance to ensure there would be no anti-social behaviour.

Natural England

231. No objections.

**Response** – Noted.

Thames Water

232. No objection subject to conditions regarding piling. These comments continue to be applicable to the revised scheme

**Response** – Noted, the relevant condition would be attached to any consent issued.

Transport for London

233. Electric car parking should be provided for all three spaces and residents should be made exempt from obtaining parking permits. The scheme as originally submitted did not meet the London Plan cycle parking standards however the revised scheme now complies with this requirement. Contributions secured for bus service improvements and cycle hire should be pooled and used flexibly for the most pressing and useful transport enhancements. The Travel Plan, Construction Logistics Plan (CLP) and a Delivery and Servicing Plan (DSP) must be submitted for approval by the council prior to commencement, to be secured by condition or s106 planning obligation.

**Response** – Noted and agreed, the details above would be secured either as conditional requirements on the consent or as obligations within the s106 agreement.

## **Community impact and equalities assessment**

234. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights
235. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
236. 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:
1. The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
  2. 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
  3. 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.
237. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership. The loss of the existing temporary business on the site would not impact on individuals with protected characteristics. The provision of 40% affordable housing would benefit those from BAME communities who are disproportionately impacted by the supply of affordable housing. The provision of accessible housing would also benefit those with disabilities.

## **Human rights implications**

238. This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.
239. This application has the legitimate aim of providing new homes and improved employment space. The rights potentially engaged by this application, including

the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

### **Positive and proactive statement**

240. The council has published its development plan and Core Strategy on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
241. The council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the development plan and core strategy and submissions that are in accordance with the application requirements.

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

Was the pre-application service used for this application?	YES
If the pre-application service was used for this application, was the advice given followed?	YES
Was the application validated promptly?	YES
If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	YES
To help secure a timely decision, did the case officer submit their recommendation in advance of the agreed Planning Performance Agreement date?	YES

### **CONCLUSION**

243. In land use terms the proposed development would fully accord with the requirements of site allocation NSP25 of the Southwark Plan by providing a mixed use development comprising new homes and re-provision of the existing employment floorspace. The co-location of employment and residential units would comply with the relevant policies in the London Plan and the new employment floorspace would be much higher quality and more flexible/usable than the existing provision.
244. Whilst there would be the loss of the existing four flats on the site, the 85 new homes would provide a significant uplift of 81 new residential units that would be high quality, sustainable, well designed and adaptable. Affordable housing would be provided at 40% including 25% social rented homes and this is a positive aspect of the development.
245. In terms of neighbouring amenity, the proposed development would have no significant adverse impacts on any neighbouring existing residential neighbours

in terms of a loss of outlook, loss of privacy or a detrimental reduction in the availability of daylight or sunlight. The immediately adjacent buildings are industrial buildings and their continued use for industrial purposes would not be compromised by the proposal. Furthermore, planning consent has been granted (or resolved to be granted) on three of the four adjacent sites for employment and residential uses in any event. Officers do not consider that the proposed development would compromise the ability to provide high quality residential accommodation on these neighbouring sites and there would be no conflict of use detrimental to amenity or commercial operations.

246. Design quality is of the utmost importance and the proposed scheme would demonstrate high quality design with robust and appropriately contextual materials and finishes. The scale, massing and appearance of the building is such that it would not have any detrimental impact on the character or setting of any listed buildings and these have been fully considered as part of the submitted THVIA.
247. The development would provide an improved public realm onto Parkhouse Street and fully on site and supervised play space would be provided for the 0-11 age group. In sustainability terms, the development would achieve a 49% carbon reduction, well in excess of the policy requirement and alongside BREEAM Outstanding, would result in a sustainable brownfield development.
248. Ecological impacts upon the adjoining SINC have been carefully considered through an independent ecological assessment, and following mitigation through conditions and planning obligations it is concluded that the proposal, like those approved on neighbouring sites, could deliver some biodiversity enhancements to Burgess Park.
249. Subject to conditions and a number of planning obligations the transport impacts of the proposal are considered to be acceptable. Impacts relating to air quality, flood risk, contaminated land and fire safety have all been considered and are found to be acceptable, subject to a number of conditions.
250. The issues raised in the large number of objections to the application have been noted, and addressed within the report and it is considered that the substantial scheme revisions that took place during the course of the application have suitably addressed the majority of concerns and this was reflected in the response to the re-consultation. On balance it is concluded that the benefits of the scheme are material considerations which can outweigh the failure to fully comply with development plan and emerging policy.
251. Overall it is concluded that the proposed development would be acceptable, and that planning permission should be granted, subject to conditions, completion of an appropriate s106 agreement.

## BACKGROUND DOCUMENTS

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

## APPENDICES

No.	Title
Appendix 1	Recommendation (draft decision notice)
Appendix 2	Consultation undertaken
Appendix 3	Consultation responses received
Appendix 4	Planning history

## AUDIT TRAIL

<b>Lead Officer</b>	Stephen Platts, Director of Planning and Growth	
<b>Report Author</b>	Terence McLellan, Team Leader Planning	
<b>Version</b>	Final	
<b>Dated</b>	30 August 2022	
<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments included</b>
Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
<b>Date final report sent to Constitutional Team</b>		31 August 2022

**APPENDIX 1****Draft Recommendation****2. Time limit condition**

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.

**3. Pre-commencement condition**

Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority: 1) An additional site investigation scheme, based on the GIR, to provide further information for a detailed assessment of the risk to all receptors that may be affected, including those off site. 2) The results of the site investigation and detailed risk assessment referred to in (1) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken. 3) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (2) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express consent of the local planning authority. The scheme shall be implemented as approved.

Reason: For the protection of Controlled Waters. The site is located over a Secondary Aquifer and it is understood that the site may be affected by historic contamination (eg, from four unspecified tanks and volatile compounds).

**4. Pre-commencement condition**



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

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

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

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

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

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

#### Reason

To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with The National Planning Policy Framework 2021 and policies P60 - Biodiversity and P61 - Trees of the Southwark Plan 2022.

#### 5. **Pre-commencement condition**

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

#### Reason

To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with The National Planning Policy Framework 2019 Parts 7, 8, 11 & 12 and policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of The Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity.

### 6. **Pre-commencement condition**

#### DRAINAGE STRATEGY

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 Addendum prepared by Icen Projects (dated August 2021). The applicant must demonstrate that the site is safe in the event of blockage/failure of the system, including consideration of exceedance flows. The site drainage must be constructed to the approved details.

Reason: To minimise the potential for the site to contribute to surface water flooding in accordance with Southwark's Strategic Flood Risk Assessment (2017), Policy SI 13 of the London Plan (2021) and policy P68 - Flood Risk of the Southwark Plan 2022.

### 7. **Pre-commencement condition**

#### FULL FIBRE CONNECTIVITY

Prior to commencement of the development hereby approved, 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 these 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 Policy S16 of the London Plan (2021)

**8. Pre-commencement condition**

**ACCESSIBLE AND WHEELCHAIR DWELLINGS**

Before the development hereby permitted is commenced, the applicant shall submit written confirmation from the appointed building control body that the following standards in the Approved Document M of the Building Regulations (2015) would be met for the units / habitable rooms as set out below. The development shall be carried out in accordance with the details thereby approved by the appointed building control body

5 affordable units (3 x 2-bed social rented units and 2 x 2-bed Intermediate units), and 5 private units (1-beds) shall be constructed and fitted out to meet Building Regulations standard M4(3)(2)(b). The remaining units shall be constructed to meet M4 (2) standard.

Reason:

To ensure the development complies with: Chapters 5 (Delivering a sufficient supply of homes) and 8 (Promoting healthy and safe communities) of the National Planning Policy Framework (2021); Policy D7 (Accessible housing) of the London Plan (2021), and Policy P8 (Wheelchair accessible and adaptable housing) of the Southwark Plan (2022).

**9. Pre-commencement condition**

**CONTAMINATION STUDY**

Prior to the commencement of development:

a) A phase 2 intrusive site investigation and associated risk assessment to fully characterise the nature and extent of any contamination of soils (including soil gases) and ground water on the site shall be submitted to and approved in writing by the Local Planning Authority.

b) In the event that contamination is found that presents a risk to future users or controlled waters or the wider environment, including the adjoining Site of Interest for Nature Conservation (Burgess Park) 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 by removing unacceptable risks to human health, controlled waters and the wider environment including the adjoining Site of Interest for Nature Conservation (Burgess Park). The approved remediation/mitigation strategy shall be implemented as part of the development.

c) Following the completion of the works and measures identified in the approved remediation strategy, a verification report shall be submitted to and approved in writing by the Local Planning Authority providing evidence that all works required by the remediation strategy have been completed and that the site is suitable and safe for the developed uses, controlled waters and in respect of the wider environment.

d) In the event that potential contamination is found at any time during development works that was not previously identified, then a scheme of investigation and risk assessment, and a remediation strategy (if not already covered following paragraph b) above) shall be submitted to the Local Planning Authority for approval in writing, in accordance with b-c above.

#### Reason

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with policy P64 'Contaminated land and hazardous substances' of the Southwark Plan 2022 and the National Planning Policy Framework 2021."

## 10. **Pre-commencement condition**

### ASBESTOS SURVEY

Prior to the commencement of any demolition of the existing building or external structures on the site, an Asbestos Survey including an intrusive

survey in accordance with HSG264, supported by an appropriate mitigation scheme to control risks to future occupiers must be submitted to and approved in writing by the Local Planning Authority. The mitigation scheme must identify potential sources of asbestos contamination and detail removal or mitigation appropriate to the proposed end use. The development must be carried out in accordance with the details thereby approved.

Reason:

To ensure that risks from potential asbestos are appropriately managed, in accordance with policy P64 'Contaminated land and hazardous substances' of the Southwark Plan (2022) and the National Planning Policy Framework 2021.

## 11. **Pre-commencement condition**

### Construction Management Plan

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

- A detailed specification of demolition and construction works at each phase of development including consideration of all environmental impacts and the identified remedial measures;
- Site perimeter continuous automated noise, dust and vibration monitoring;
- Engineering measures to eliminate or mitigate identified environmental impacts e.g. hoarding height and density, acoustic screening, sound insulation, dust control measures, emission reduction measures, location of specific activities on site, etc.;
- Arrangements for a direct and responsive site management contact for nearby occupiers during demolition and/or construction (signage on hoardings, newsletters, residents liaison meetings, etc.)
- A commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme; Site traffic - Routing of in-bound and outbound site traffic, one-way site traffic arrangements on site, location of lay off areas, etc.;
- Site waste Management - Accurate waste stream identification, separation, storage, registered waste carriers for transportation and disposal at appropriate destinations.

- Details to minimise impacts upon the adjoining Site of Interest for Nature Conservation (Burgess Park) by way of noise, dust, light pollution and surface-run-off;
- Measures to maximise the use of sustainable modes of transport for deliveries and collections;
- Measures to protect pedestrians and cyclists in line with the Mayor of London's Vision Zero;
- A commitment that all Non-Road Mobile Machinery equipment (37 kW and 560 kW) shall be registered on the NRMM register and meets the standard as stipulated by the Mayor of London;
- Compliance with the Non-Road Mobile Machinery Low Emission Zone for London;
- Monitoring of the number of heavy goods construction vehicles travelling to and from the site. In the event that there are more than 25 such vehicles per day on average during a one month period, a local air quality assessment including any necessary mitigation measures shall be submitted to and approved in writing by the Local Planning Authority and the development carried out in accordance with the details thereby approved;
- 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'  
 BS 7385-2:1993 Evaluation and measurement for vibration in buildings. Guide to damage levels from ground-borne vibration,  
 BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings - vibration sources other than blasting.

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 Policy P56 'Protection of amenity' of the Southwark Plan (2022), and the National Planning Policy Framework (2021).

12. **Pre-commencement condition**

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. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure.

13. **Above grade condition**

**HARD AND SOFT LANDSCAPING**

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

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

Reason:

So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: The National Planning Policy Framework 2021; and policies P57 - Open Space, P59 - Green Infrastructure and P61 - Trees of the Southwark Plan 2022.

14. **Above grade condition**

ECOLOGICAL MANAGEMENT PLAN

Before any above grade work hereby authorised begins, a landscape management plan, including long- term design objectives, management responsibilities and maintenance schedules for all landscaped areas (except privately owned domestic gardens), shall be submitted to and approved in writing by the local planning authority. The landscape management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

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 an mandatory criteria of BREEAM (LE5) to monitor long term impact on biodiversity a requirement is to produce a Landscape and Habitat Management Plan.

15. **Above grade condition**

DETAILED DRAWINGS

Prior to the commencement of any above grade works scale 1:5 or 1:10 section detail drawings of the following, complete with references back to the overall design shall be submitted to and approved in writing by the Local Planning Authority

- \_ the facades;
- \_ heads, cills and jambs of openings;
- \_ parapets;
- \_ roof edges

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

Reason:



In order that the Local Planning Authority may be satisfied as to the design and details in the interest of the special architectural qualities of the proposal in accordance with Chapter 12 (Achieving well designed places) of the National Planning Policy Framework (2021) and policies P13 'Design of places' and P14 'Design quality' of the Southwark Plan 2022.

**16. Above grade condition**

**SAMPLE MATERIALS/PANELS/BOARDS**

Prior to above grade works commencing, material samples/sample-panels/sample-boards of all external facing materials to be used in the carrying out of this permission shall be presented on site and approved in writing by the Local Planning Authority; the development shall not be carried out otherwise than in accordance with any such approval given.

**Reason:**

In order to ensure that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing in accordance with Chapter 12 (Achieving well-designed places) of the National Planning Policy Framework (2021); Policy D4 (Delivering good design) of the London Plan (2021) and policies P13 'Design of places' and P14 'Design quality' of the Southwark Plan 2022.

**17. Above grade condition**

**SECURED BY DESIGN**

a) The development hereby permitted shall incorporate security measures to minimise the risk of crime and to meet the specific security needs of the development in accordance with the principles and objectives of Secured by Design. Details of these measures shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of above grade works and shall be implemented in accordance with the approved details prior to occupation.

b) Prior to the occupation of the development a Secured by Design Certificate shall be submitted to and approved in writing by the Local Planning Authority.

**Reason:**

In pursuance of the Local Planning Authority's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime

prevention, in accordance with Chapter 8 (Promoting healthy and safe communities) of the National Planning Policy Framework (2021); Policy D11 (Safety, security and resilience to emergency) of the London Plan (2021) and P16 'Designing out crime' of the Southwark Plan (2022).

18. **Above grade condition**

PLAYSPACE AND ACCESS TO AMENITY SPACE

Prior to the commencement of above grade works, details of the play equipment to be installed on the site shall be submitted to and approved in writing by the Local Planning Authority. The play equipment shall be provided in accordance with the details thereby approved prior to the occupation of the residential units. All playspace and communal amenity space within the development shall be available to all residential occupiers of the development in perpetuity.

Reason:

To ensure that there would be adequate play facilities to serve the development, in accordance with policy P15 'Residential design' of the Southwark Plan (2022).

19. **Above grade condition**

CLASS E FIT OUT

Before any work above grade hereby authorised begins, full particulars shall be submitted to and approved in writing by the Local Planning Authority of a scheme showing that the parts employment floorspace shall be fitted-out to an appropriate level for light industrial use. This shall include details of the mechanical and electrical fit-out of the units, heating and cooling provision, sprinklers, and the provision of kitchen and toilet facilities. The facilities shall be provided in accordance with the approved details.

Reason: In granting this permission the Local Planning Authority has had regard to the special circumstances of this case in accordance with policy P30 'Office and businesses development' of the Southwark Plan (2022) and the National Planning Policy Framework 2021.

20. **Above grade condition**

Prior to the commencement of above grade works, details of bird bricks and bat tubes shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the development hereby approved.

No less than 10 swift bricks and 6 bat tubes shall be provided and the details shall include the exact location, specification and design of the habitats. The bricks / tubes shall be installed within the development prior to the first occupation of the building of which they form part. They shall be installed strictly in accordance with the details so approved, and shall be maintained as such thereafter.

A post completion assessment will be required to confirm that these features have been installed to the agreed in accordance with the approved details.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with Chapter 15 (Conserving and enhancing the natural environment) of the National Planning Policy Framework (2021); Policy G6 (Biodiversity and access to nature) of the London Plan (2021); and Policy P60 (Biodiversity) of the Southwark Plan (2022).

**21. Above grade condition**

1) Before any above grade work hereby authorised begins, detailed drawings and a method statement (including arboricultural assessment) for improvements and any other required work to the boundary wall between the site and Burgess Park shall be submitted to and approved in writing by the Local Planning Authority. The wall shall be capable of being planted as a green wall on the Burgess Park side and shall be planted as a green wall prior to the occupation of the development and maintained as such thereafter, in accordance with a maintenance schedule which shall also be submitted for approval in writing prior to the occupation of the development.

2) Boundary treatment for all other boundaries shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of above grade works and maintained as such thereafter.

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

Reason:

In the interests of visual and residential amenity and to avoid damage to the existing trees which represent an important visual amenity in the area in

accordance with The National Planning Policy Framework 2021, and policies P13 'Design of places', P56 'Residential amenity' and P60 'Biodiversity' of the Southwark Plan 2022.

**22. Pre-Occupation condition**

Prior to occupation of the development, a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, if appropriate, and for the reporting of this to the local planning authority. Any long-term monitoring and maintenance plan shall be implemented as approved.

Reason: Should remediation be deemed necessary, the applicant should demonstrate that any remedial measures have been undertaken as agreed and the environmental risks have been satisfactorily managed so that the site is deemed suitable for use.

**23. Pre-Occupation condition**

**SERVICING MANAGEMENT PLAN**

Prior to the occupation of the development hereby permitted, a Servicing Management Plan detailing how all elements of the site are to be serviced including details for maximising the use of bicycles and other sustainable methods for deliveries and measures to protect pedestrians and cyclists in line with the Mayor of London's Vision Zero shall be submitted to and approved in writing by the Local Planning Authority. The servicing of the development shall be carried out in accordance with the approval given and the Service Management Plan shall remain extant for as long as the development is occupied.

Servicing hours for the employment space shall be limited to 8am to 8pm Monday to Saturday.

Reason:

To ensure compliance with: Chapter 9 (Promoting sustainable transport) of the National Planning Policy Framework (2021); Policy T7 (Deliveries,

servicing and construction) of the London Plan (2021), and Policy P50 'Highway impacts' of the Southwark Plan 2022.

24. **Pre-Occupation condition**

**INTERNAL NOISE LEVELS RESTRICTION**

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

Bedrooms - 35dB LAeq T<sub>1/2</sub>, 30 dB L Aeq T\*, 45dB LAFmax T \*  
 Living and Dining rooms- 35dB LAeq T<sub>1/2</sub>  
 \* - Night-time - 8 hours between 23:00-07:00  
 T<sub>1/2</sub> - Daytime - 16 hours between 07:00-23:00

This shall be achieved by following the recommendations for glazing presented in the submitted Noise Impact Assessment report by Mach Residential, reference PH3539-MAL-XX-ZZ-RP-J-9000 - P05 November 2021. Additional trickle vents must have acoustic insulation to ensure that the above requirements are achieved.

Following completion of the development and prior to occupation, a validation test shall be carried out on a relevant sample of premises that face Parkhouse Street. The results shall be submitted to the Local Planning Authority 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 Chapter 8 (Promoting healthy and safe communities) and Chapter 12 (Achieving well-designed places) of the National Planning Policy Framework (2021); Policy D4 (Delivering good design) of the London Plan (2021) and policies P15 'Residential design' and P56 'Protection of amenity' of the Southwark Plan 2022.

25. **Pre-Occupation condition**

The habitable rooms within the development sharing a party ceiling/floor/wall element with commercial premises shall be designed and constructed to provide reasonable resistance to the transmission of sound sufficient to ensure that noise due to the commercial premises does not exceed NR20 when measured as an LAeq across any 5 minute period.

A report shall be submitted in writing to and approved by the Local Planning Authority prior to the occupation of the development detailing acoustic predictions and mitigation measures to ensure that the above standard is met. The development shall be carried out in accordance with the approval given and the approved scheme shall be permanently maintained thereafter.

Reason:

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities within the commercial premises accordance with policies P15 'Residential Design' and P56 'Protection of amenity' of the Southwark Plan 2022.

**26. Pre-Occupation condition**

**WHOLE LIFE CARBON**

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 WLC assessment (authored by Hoare Lee, Rev 01, dated 15 April 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.

**27. Pre-Occupation condition**

**DRAINAGE VERIFICATION REPORT**

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 prepared by Patrick Parsons (ref: L19019, dated April 2021) 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).

**28. Pre-Occupation condition**

**DETAILS OF THE SHOWERING FACILITIES**

Before the first occupation of the employment space, details of showering facilities to be provided for the commercial units shall be submitted to and approved in writing by the Local Planning Authority and thereafter the shower facilities shall be retained and the space used for no other purpose.

Reason:

In order to ensure that satisfactory facilities are provided and retained in order to encourage the use of non-car based travel, in accordance with: Chapter 9 (Promoting sustainable transport) of the National Planning Policy Framework (2021); Policy T2 (Healthy streets) of the London Plan (2021) and policy P53 'Cycling' of the Southwark Plan 2022.

**29. Pre-Occupation condition**

Prior to the occupation of the development a wildlife sensitive lighting strategy which takes into account lighting from within the development and shows that no lighting will be provided on balconies facing Burgess Park shall be submitted to and approved in writing by the Local Planning Authority. The recommended lighting specification using LEDs (at 3 lux) is because they have little UV. The spectrum recommended is 80% amber and 20% white with a clear view, no UV, horizontal light spread ideally less than 70°½ and a timer. The lighting shall also comply with Guidance Note 1 for the reduction of obtrusive light (2021) from the Institute of Lighting Professionals and Bat Conservation Trust Guidance note 8 'Bats and Artificial lighting'.

Reason:

To ensure compliance with the Habitats Regulations and the Wildlife & Countryside Act 1981 (as amended), and to ensure that there would be no

amenity issues arising from the lighting, in accordance with policies P 56 'Protection of amenity' and P60 'Biodiversity' of the Southwark Plan 2022.

30. **Pre-Occupation condition**

PROVISION OF CYCLE STORAGE

Before the first occupation of the development, the cycle storage facilities as shown on the drawings hereby approved for

- (i) Residential
- (ii) Commercial

Shall be provided and made available to the users of the development. Thereafter, such facilities shall be retained and the space used for no other purpose and the development shall not be carried out otherwise in accordance with any such approval given.

Reason:

To ensure that satisfactory safe and secure bicycle parking is provided and retained for the benefit of the users and occupiers of the building in order to encourage the use of alternative means of transport and to reduce reliance on the use of the private car in accordance with: Chapter 9 (Promoting Sustainable Transport) of the National Planning Policy Framework (2021); Policy T5 (Cycling) of the London Plan (2021), and policy P53 'Cycling' of the Southwark Plan 2022.

31. **Pre-Occupation condition**

GATE ACROSS VEHICULAR ACCESS

Prior to the occupation of the development, details of the operation of the gate across the vehicular entrance into the development (which shall be inward opening) including details of how servicing and residents' vehicles would operate the gate shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the details thereby approved.

Reason:

In the interests of highway safety, in accordance with policy P50 'Highway impacts' of the Southwark Plan 2022.

32. **Pre-Occupation condition**



## PROVISION OF REFUSE STORAGE AND STRATEGY

a) The refuse stores shall be provided in accordance with the approved plans prior to the occupation of the development and retained as such thereafter.

b) Prior to the occupation of the development a detailed refuse management strategy including details of a refuse holding area shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the details thereby approved.

### Reason:

To 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 Chapters 8 (Promoting healthy and safe communities) and 12 (Achieving well-designed places) of the National Planning Policy Framework (2021); Policy D4 (Delivering good design) of the London Plan (2021), and policy P62 'Reducing waste' of the Southwark Plan 2022.

## 33. **Pre-Occupation condition**

### WATER NETWORK UPGRADES

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

### Reason:

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

## 34. **Pre-Occupation condition**

### FIT OUT OF ENTRANCE LOBBIES

Prior to the occupation of the development, details of the internal fit out and finishes to the residential entrance lobbies demonstrating that this aspect of the development would be tenure blind shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the development thereby approved and maintained as such thereafter.

Reason:

To ensure that both residential entrance lobbies would be of a high standard of design, in accordance with policy P14 'Design quality' of the Southwark Plan 2022.

**35. Pre-Occupation condition**

Prior to any occupation, a Lighting Plan shall be submitted to and approved by the Local Planning Authority. The recommended lighting specification using LED's (at 3 lux) because they have little UV. The spectrum recommended is 80% amber and 20% white with a clear view, no UV, horizontal light spread ideally less than 70° and a timer.

Reason: To ensure compliance with the Habitats Regulations and the Wildlife & Countryside Act 1981 (as amended).

**36. Compliance condition**

Whilst the principles and installation of sustainable drainage schemes are to be encouraged, no drainage systems for the infiltration of surface water drainage into the ground are permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to Controlled Waters. The development shall be carried out in accordance with the approval details.

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

**37. Compliance condition**

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

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

**38. Compliance condition**

Residential units and building heights

The development hereby permitted is limited to 85 residential units, 1,306sqm (GIA) of employment floorspace (Class E(g) B2 and B8) and a maximum height of up to 27.225m.

Reason:

This is in accordance with the application details and the approved plans.

**39. Compliance condition**

**RESTRICTION ON THE INSTALLATION OF TELECOMMUNICATIONS EQUIPMENT**

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

Reason:

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

(2021) and policies P13 'Design of places' and P14 'Design quality' of the Southwark Plan 2022.

40. **Compliance condition**

PLANT NOISE

The Rated sound level from any plant, together with any associated ducting shall not exceed the Background sound level (LA90 15min) at the nearest noise sensitive premises. Furthermore, the 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 from plant and machinery, in accordance with: Chapter 8 (Promoting healthy and safe communities) of the National Planning Policy Framework (2021); Policies D13 (Agent of change) and D14 (Noise) of the London Plan (2021) and policy P56 'Protection of amenity' of the Southwark Plan 2022.

41. **Compliance condition**

URBAN GREENING FACTOR

The measures set out in the urban greening factor calculation prepared by Ryder Architecture to achieve a score of at least 0.40022 shall be implemented in full.

Reason:

In order to meet the requirements of policy G5 'Urban greening' of the London Plan (2021).

42. **Compliance condition**

RESTRICTION ON THE INSTALLATION OF ROOF PLANT

No roof plant, equipment or other structures, other than as shown on the plans hereby approved or approved pursuant to a condition of this permission, shall be placed on the roof or be permitted to project above the roofline of any part of the 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) and policies P13 'Design of places' and P14 'Design quality' of the Southwark Plan 2022.

**43. Compliance condition**

**DISABLED PARKING**

Prior to occupation of the development hereby permitted the three accessible parking spaces shall be made available and retained for the purposes of car parking for disabled residents for as long as the development is occupied. Each of the spaces shall be fitted with an electric vehicle charging point which shall be maintained in good working order thereafter.

Reason:

To ensure that the parking spaces for disabled people are provided and retained in accordance with: Chapter 9 (Promoting sustainable transport) of the National Planning Policy Framework (2021); Policy T6 (Car parking) of the London Plan (2021) and policy P55 'Parking standards for disabled people and the physically impaired' of the Southwark Plan 2022.

**44. Compliance condition**

**RESTRICTION ON THE INSTALLATION OF APPURTENANCES ON THE ELEVATIONS**

No meter boxes, flues 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. Details of additional vents

(should they be required) shall be submitted to and approved in writing by the Council prior to the commencement of above grade works.

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) and policies P13 'Design of places' and P14 'Design quality' of the Southwark Plan 2022.

**45. Compliance condition**

Potable water

Each dwelling hereby permitted shall be constructed to achieve at least the optional standard 36(2b) of Approved Document G of the Building Regulations (2015).

Reason:

To ensure the development complies with the National Planning Policy Framework 2019, Strategic Policy 13 (High environmental standards) of the Core Strategy 2011, and policy P67 'Reducing water use' of the Southwark Plan 2022.

**46. Compliance condition**

RESTRICTION ON USE CLASS

Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 and any associated provisions of the Town and Country Planning General Permitted Development Order (including any future amendment of enactment of those Orders) the employment floorspace hereby approved shall be used for B2, B8 or Use Class E(g) purposes only unless otherwise agreed by way of a formal application for planning permission.

Reason:

In order to ensure that the site continues to provide commercial floorspace which can accommodate light industrial uses in accordance with the designated industrial use of the site and to comply with London Plan Policies GG5, E2, E4 and E7 (2021) and policy P30 'Office and business development' and site allocation NSP 25 of the Southwark Plan 2022.

47. **Compliance condition**

FIRE SAFETY STRATEGY

The development hereby permitted shall be carried out in accordance with the Fire Strategy Statement & Form by Jensen Hughes dated 8th October 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).

48. **Special condition**

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as approved, verified and reported to the satisfaction of the Local Planning Authority.

Reason: There is always the potential for unexpected contamination to be identified during development groundworks. We should be consulted should any contamination be identified that could present an unacceptable risk to Controlled Waters.

49. **Special condition**

BREEAM REPORT AND POST CONSTRUCTION REVIEW

(a) Before any fit out works to the commercial premises hereby authorised begins, an independently verified BREEAM report (detailing performance in

each category, overall score, BREEAM rating and a BREEAM certificate of building performance) to achieve a minimum 'outstanding' rating including at least 'excellent' rating under the WAT 01 category shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any such approval given;

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

**Reason**

To ensure the proposal complies with Chapter 14 (Meeting the challenge of climate change, flooding and coastal change) of the National Planning Policy Framework (2021); Policy SI 2 (Minimising greenhouse gas emissions) of the London Plan (2021) and policy P69 'Sustainability standards' of the Southwark Plan 2022.

**50. Special condition**

**SURFACE WATER DRAINAGE**

Whilst the principles and installation of sustainable drainage schemes are to be encouraged, no drainage systems for the infiltration of surface water drainage into the ground are permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

**Reason:**

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

**51. Special condition**

**PILING**



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

Reason:

To ensure that the development does not harm groundwater resources in line with the National Planning Policy Framework (NPPF) (Paragraph 170). 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 Environment Agency (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.

**52. Special condition**

TRAVEL PLAN

- a) The measures set out in the Framework Travel Plan by Icenl dated October 2021 shall be implemented in full.
- b) At the start of the second year of operation of the approved Travel Plan, a detailed survey showing the methods of transport used by all those users of the building to and from the site and how this compares with the proposed measures and any additional measures to be taken to encourage the use of public transport, walking and cycling to the site shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise in accordance with any such approval given.

Reason:

In order that the use of non-car based travel is encouraged in accordance with: Chapter 9 (Promoting sustainable transport) of the National Planning Policy Framework (2021); Policy T2 (Healthy streets) of the London Plan (2021) and policy P50 'Highway impacts' of the Southwark Plan 2022.

**53. Special condition**

Site Supervision

The completed schedule of site supervision and monitoring of the arboricultural protection measures as approved in Tree Protection condition shall be submitted for approval in writing by the Local Planning Authority within 28 days from completion of the development hereby permitted. This condition may only be fully discharged on completion of the development, subject to satisfactory written evidence of compliance through contemporaneous supervision and monitoring of the tree protection throughout construction by the retained or pre-appointed tree specialist.

**Reason**

To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with The National Planning Policy Framework 2021 and policy P61 - Trees of the Southwark Plan 2022.

Informative notes to the applicant relating to the proposed development



## Consultation undertaken

### Consultation Undertaken

#### Notices:

Site Notice: •03.12.2019  
and  
01.03.2022

Press Notice: • Date Notice was published: • Expiry Date of Notice: 24.03.2022

21.11.2019 and  
24.02.2022

#### Consultation Letters to Neighbours and Local Groups:

Recipient Address:

Date Letter Sent:

- 97 Colman Road, London, Se5 7tf
- Flat 13, Barrett Court, 1 Dobson Walk, London, SE5 7FL
- 119 Coleman Road, London, SE5 7TF
- 30 Rainbow Street, London, SE5 7TD
- 38 Kitson road, London, SE5 7LF
- 125 Benhill Road, London, SE5 7LZ
- 101 Wells Way, London, SE5 7SZ
- 40 Melbreak House, East Dulwich Estate, London
- Flat 6, 69 Camberwell Grove, London
- 30 Coleman Road, Camberwell, SE5 7TG
- Flat 4, 113 Wells Way, London, SE5 7SZ
- 5 Parkhouse Street, The Imperial City Camberwell  
London, SE5 7TQ
- 5 Parkhouse Street, The Imperial City Camberwell  
London, SE5 7TQ
- 117 coleman road, london, se5 7tf
- 13, Barrett, 1 Dobson Walk, London
- Burgess Park, London, SE5 0RJ
- 13 Parkhouse Street, London, Southwark
- 13 Parkhouse Street, London, Southwark
- 9 Parkhouse Street, London, Southwark
- 9 Parkhouse Street, London, Southwark
- 25-33 Parkhouse Street, London, Southwark

- 25-33 Parkhouse Street, London, Southwark
- 1 Coleman Road, London, Southwark
- 1 Coleman Road, London, Southwark
- 95 Wells Way, London, Southwark
- 95 Wells Way, London, Southwark
- 87 Wells Way, London, Southwark
- 87 Wells Way, London, Southwark
- 79 Wells Way, London, Southwark
- 79 Wells Way, London, Southwark
- 21A Southampton Way, London, Southwark
- 21A Southampton Way, London, Southwark
- 15B Southampton Way, London, Southwark
- 15B Southampton Way, London, Southwark
- Unit 9, Burgess Industrial Park, Parkhouse Street
- Unit 9, Burgess Industrial Park, Parkhouse Street
- 49-65 Southampton Way, London, Southwark
- 49-65 Southampton Way, London, Southwark
- Unit 6 First Floor, Burgess Industrial Estate, Parkhouse Street
- Unit 6 First Floor, Burgess Industrial Estate, Parkhouse Street
- Unit 6 First Floor, Burgess Industrial Estate, Parkhouse Street
- 81 Wells Way, London, Southwark
- 81 Wells Way, London, Southwark
- 3 Coleman Road, London, Southwark
- 3 Coleman Road, London, Southwark
- 93 Wells Way, London, Southwark
- 93 Wells Way, London, Southwark
- 77 Wells Way, London, Southwark
- 77 Wells Way, London, Southwark
- 91 Wells Way, London, Southwark
- 91 Wells Way, London, Southwark
- 21-23 Parkhouse Street, London, Southwark
- 21-23 Parkhouse Street, London, Southwark
- 89 Wells Way, London, Southwark
- 89 Wells Way, London, Southwark
- Flat 11, 59 Wells Way, London
- Flat 11, 59 Wells Way, London
- Flat 4, 73 Wells Way, London
- Flat 4, 73 Wells Way, London
- Flat 2, 63 Wells Way, London
- Flat 2, 63 Wells Way, London
- Flat 7, 59 Wells Way, London
- Flat 7, 59 Wells Way, London
- Flat 2, 73 Wells Way, London
- Flat 2, 73 Wells Way, London
- Flat 5, 63 Wells Way, London

- Flat 5, 63 Wells Way, London
- Flat 8, 59 Wells Way, London
- Flat 8, 59 Wells Way, London
- 111 Wells Way, London, Southwark
- 111 Wells Way, London, Southwark
- 85 Wells Way, London, Southwark
- 85 Wells Way, London, Southwark
- 39 Parkhouse Street, London, Southwark
- 39 Parkhouse Street, London, Southwark
- 33A Southampton Way, London, Southwark
- 33A Southampton Way, London, Southwark
- 66 Wells Way, London, Southwark
- 66 Wells Way, London, Southwark
- 83 Wells Way, London, Southwark
- 83 Wells Way, London, Southwark
- 7 Parkhouse Street, London, Southwark
- 7 Parkhouse Street, London, Southwark
- 45 Southampton Way, London, Southwark
- 45 Southampton Way, London, Southwark
- 13 Southampton Way, London, Southwark
- 13 Southampton Way, London, Southwark
- 39A Southampton Way, London, Southwark
- 39A Southampton Way, London, Southwark
- 15A Southampton Way, London, Southwark
- 15A Southampton Way, London, Southwark
- Flat 6, 59 Wells Way, London
- Flat 6, 59 Wells Way, London
- Flat 1, 59 Wells Way, London
- Flat 1, 59 Wells Way, London
- 5-7 Southampton Way, London, Southwark
- 5-7 Southampton Way, London, Southwark
- Flat A, 25 Southampton Way, London
- Flat A, 25 Southampton Way, London
- 107 Wells Way, London, Southwark
- 107 Wells Way, London, Southwark
- 37 Southampton Way, London, Southwark
- 37 Southampton Way, London, Southwark
- 23 Southampton Way, London, Southwark
- 23 Southampton Way, London, Southwark
- 5A Parkhouse Street, London, Southwark
- 5A Parkhouse Street, London, Southwark
- 109 Wells Way, London, Southwark
- 109 Wells Way, London, Southwark
- 13A Parkhouse Street, London, Southwark
- 13A Parkhouse Street, London, Southwark
- 13A Parkhouse Street, London, Southwark

08.01.2020

- 41A Southampton Way, London, Southwark
- 41A Southampton Way, London, Southwark
- 43B Southampton Way, London, Southwark
- 43B Southampton Way, London, Southwark
- 33B Southampton Way, London, Southwark
- 33B Southampton Way, London, Southwark
- 85 Tower Mill Road, London, Southwark
- 85 Tower Mill Road, London, Southwark
- Flat 2, 83 Tower Mill Road, London
- Flat 2, 83 Tower Mill Road, London
- Flat 5, 83 Tower Mill Road, London
- Flat 5, 83 Tower Mill Road, London
- Flat 3, 47 Southampton Way, London
- Flat 3, 47 Southampton Way, London
- 75 Wells Way, London, Southwark
- 75 Wells Way, London, Southwark
- Top Flat, 4 Claremont Villas, Southampton Way, London
- 29 Southampton Way, London, Southwark
- 29 Southampton Way, London, Southwark
- 29A Southampton Way, London, Southwark
- 29A Southampton Way, London, Southwark
- 23A Southampton Way, London, Southwark
- 23A Southampton Way, London, Southwark
- 11 Parkhouse Street, London, Southwark
- 11 Parkhouse Street, London, Southwark
- 103 Wells Way, London, Southwark
- 103 Wells Way, London, Southwark
- 47 Southampton Way, London, Southwark
- 47 Southampton Way, London, Southwark
- Flat 1, 47 Southampton Way, London
- Flat 1, 47 Southampton Way, London
- 1A Parkhouse Street, London, Southwark
- 1A Parkhouse Street, London, Southwark
- 19A Southampton Way, London, Southwark
- 19A Southampton Way, London, Southwark
- 17A Southampton Way, London, Southwark
- 17A Southampton Way, London, Southwark
- 101 Wells Way, London, Southwark
- 101 Wells Way, London, Southwark
- 25 Southampton Way, London, Southwark
- 25 Southampton Way, London, Southwark
- 21 Southampton Way, London, Southwark
- 21 Southampton Way, London, Southwark
- 12 Parkhouse Street, London, Southwark
- 12 Parkhouse Street, London, Southwark
- 15-19 Parkhouse Street, London, Southwark

- 15-19 Parkhouse Street, London, Southwark
- 41B Southampton Way, London, Southwark
- 41B Southampton Way, London, Southwark
- 23B Southampton Way, London, Southwark
- 23B Southampton Way, London, Southwark
- 105 Wells Way, London, Southwark
- 105 Wells Way, London, Southwark
- Flat 4, 63 Wells Way, London
- Flat 4, 63 Wells Way, London
- Flat 2, 45 Southampton Way, London
- Flat 2, 45 Southampton Way, London
- 11A Parkhouse Street, London, Southwark
- 11A Parkhouse Street, London, Southwark
- 43A Southampton Way, London, Southwark
- 43A Southampton Way, London, Southwark
- 5 Parkhouse Street, London, Southwark
- 5 Parkhouse Street, London, Southwark
- 67 Wells Way, London, Southwark
- 67 Wells Way, London, Southwark
- 61 Wells Way, London, Southwark
- 61 Wells Way, London, Southwark
- Unit 5 Ground Floor, Burgess Industrial Estate, Parkhouse Street
- Unit 5 Ground Floor, Burgess Industrial Estate, Parkhouse Street
- Flat 12, 59 Wells Way, London
- Flat 12, 59 Wells Way, London
- 99 Wells Way, London, Southwark
- 99 Wells Way, London, Southwark
- 41 Southampton Way, London, Southwark
- 41 Southampton Way, London, Southwark
- 19 Southampton Way, London, Southwark
- 19 Southampton Way, London, Southwark
- 2 Parkhouse Street, London, Southwark
- 2 Parkhouse Street, London, Southwark
- 73 Wells Way, London, Southwark
- 73 Wells Way, London, Southwark
- 37A Parkhouse Street, London, Southwark
- 37A Parkhouse Street, London, Southwark
- 19B Southampton Way, London, Southwark
- 19B Southampton Way, London, Southwark
- 31 Southampton Way, London, Southwark
- 31 Southampton Way, London, Southwark
- 17 Southampton Way, London, Southwark
- 17 Southampton Way, London, Southwark
- 43 Parkhouse Street, London, Southwark



- 43 Parkhouse Street, London, Southwark
- 10 Parkhouse Street, London, Southwark
- 10 Parkhouse Street, London, Southwark
- Flat 6, 73 Wells Way, London
- Flat 6, 73 Wells Way, London
- 7A Parkhouse Street, London, Southwark
- 7A Parkhouse Street, London, Southwark
- 39B Southampton Way, London, Southwark
- 39B Southampton Way, London, Southwark
- 3 Parkhouse Street, London, Southwark
- 3 Parkhouse Street, London, Southwark
- 1 Parkhouse Street, London, Southwark
- 1 Parkhouse Street, London, Southwark
- 39 Southampton Way, London, Southwark
- 39 Southampton Way, London, Southwark
- Flat 8, 63 Wells Way, London
- Flat 8, 63 Wells Way, London
- 71 Wells Way, London, Southwark
- 71 Wells Way, London, Southwark
- 9A Parkhouse Street, London, Southwark
- 9A Parkhouse Street, London, Southwark
- 31A Southampton Way, London, Southwark
- 31A Southampton Way, London, Southwark
- 15C Southampton Way, London, Southwark
- 15C Southampton Way, London, Southwark
- 37 Parkhouse Street, London, Southwark
- 37 Parkhouse Street, London, Southwark
- 35 Southampton Way, London, Southwark
- 35 Southampton Way, London, Southwark
- 33 Southampton Way, London, Southwark
- 33 Southampton Way, London, Southwark
- 3A Parkhouse Street, London, Southwark
- 3A Parkhouse Street, London, Southwark
- Flat 4, 47 Southampton Way, London
- Flat 4, 47 Southampton Way, London
- Flat 2, 47 Southampton Way, London
- Flat 2, 47 Southampton Way, London
- Street Record, Parkhouse Street, London
- Street Record, Parkhouse Street, London
- Flat 5, 73 Wells Way, London
- Flat 5, 73 Wells Way, London
- 65 Wells Way, London, Southwark
- 65 Wells Way, London, Southwark
- Street Record, Donato Drive, London
- Street Record, Donato Drive, London

- Wells Way Triangle Residents Association, C/o Susie Giles (Chair), 38 Rainbow Street

- Wells Way Triangle Residents Association, C/o Susie Giles (Chair), 38 Rainbow Street

- 103 Wells Way, London, SE5 7SZ

- 69 Coleman Road, LONDON, SE5 7TF

- 42 Camberwell Grove, London, SE5 8RE

06.03.2022

- 25 Aylesbury Road, London, SE17 2EQ

- 86 Tower Mill Road, London, SE15 6BP

- 5a Parkhouse Street, Camberwell, SE5 7TQ

- Flat 2, 113 Wells Way, London

- 18 Rainbow Street, London, SE57TD

- Flat 5, 113 Wells Way, London, SE5 7SZ

- Flat 6 Fontenelle, Sceaux Gardens, London

- 25 Rainbow Street, London, SE5 7TB

- 146A Elmington Road, London, Se5 7RA

- 50 Coleman Rd, London, SE5 7TG

- 50 Coleman Rd, Camberwell, London

- Flat 2 South City Court, 52 Peckham Grove, London

- 7 Hodgkin Court, 2 Dobson Walk, Camberwell

- 128 Benhill Road, London, SE5 7LZ

- 11A Parkhouse Street, Camberwell, SE5 7TQ

- Flat 4, 59 Wells Way, London

- Flat 4, 59 Wells Way, London

- Roof Top Se0029, Burgess Industrial Estate, Parkhouse Street

- Roof Top Se0029, Burgess Industrial Estate, Parkhouse Street

- Unit 10, Burgess Industrial Park, Parkhouse Street

- Unit 10, Burgess Industrial Park, Parkhouse Street

- 27A Southampton Way, London, Southwark

- 27A Southampton Way, London, Southwark

- Ground Floor Flat, 39 Parkhouse Street, London

- Ground Floor Flat, 39 Parkhouse Street, London

- Flat 3, 83 Tower Mill Road, London

- Flat 3, 83 Tower Mill Road, London

- 81 Tower Mill Road, London, Southwark

- 81 Tower Mill Road, London, Southwark

- Flat 3, 45 Southampton Way, London

- Flat 3, 45 Southampton Way, London

- Unit 7, Burgess Industrial Park, Parkhouse Street

- Unit 7, Burgess Industrial Park, Parkhouse Street

- 41 Parkhouse Street, London, Southwark

- 41 Parkhouse Street, London, Southwark

- 97 Wells Way, London, Southwark

- 97 Wells Way, London, Southwark

- Street Record, Coleman Road, London
- Street Record, Coleman Road, London
- Flat B, 25 Southampton Way, London
- Flat B, 25 Southampton Way, London
- Unit Three And Ground Floor Unit Four And First Floor Unit Five, Burgess Industrial Estate, Parkhouse Street
  - Unit Three And Ground Floor Unit Four And First Floor Unit Five, Burgess Industrial Estate, Parkhouse Street
    - 63 Wells Way, London, Southwark
    - 63 Wells Way, London, Southwark
    - 43 Southampton Way, London, Southwark
    - 43 Southampton Way, London, Southwark
    - Flat 14, 59 Wells Way, London
    - Flat 14, 59 Wells Way, London
    - 27 Southampton Way, London, Southwark
    - 27 Southampton Way, London, Southwark
    - Roof Top 31721, Burgess Industrial Estate, Parkhouse Street
      - Roof Top 31721, Burgess Industrial Estate, Parkhouse Street
        - Unit 2, Burgess Industrial Estate, Parkhouse Street
        - Unit 2, Burgess Industrial Estate, Parkhouse Street
        - Unit 6 Ground Floor, Burgess Industrial Estate, Parkhouse Street
          - Unit 6 Ground Floor, Burgess Industrial Estate, Parkhouse Street
            - Telecommunications Mast 90071, 14-40 Parkhouse Street, London
            - Telecommunications Mast 90071, 14-40 Parkhouse Street, London
            - Flat 7, 63 Wells Way, London
            - Flat 7, 63 Wells Way, London
            - Flat 6, 63 Wells Way, London
            - Flat 6, 63 Wells Way, London
            - Flat 5, 59 Wells Way, London
            - Flat 5, 59 Wells Way, London
            - Flat 9, 59 Wells Way, London
            - Flat 9, 59 Wells Way, London
            - Flat 2, 59 Wells Way, London
            - Flat 2, 59 Wells Way, London
            - 59 Wells Way, London, Southwark
            - 59 Wells Way, London, Southwark
            - 35A-35B Southampton Way, London, Southwark
            - 35A-35B Southampton Way, London, Southwark
            - 17B Southampton Way, London, Southwark
            - 17B Southampton Way, London, Southwark

- Flat 13, 59 Wells Way, London
- Flat 13, 59 Wells Way, London
- Flat 3, 73 Wells Way, London
- Flat 3, 73 Wells Way, London
- Burgess Industrial Estate, Parkhouse Street, London
- Burgess Industrial Estate, Parkhouse Street, London
- Unit 9, 2-10 Parkhouse Street, London
- Unit 9, 2-10 Parkhouse Street, London
- Unit 4 First Floor, Burgess Industrial Estate, Parkhouse Street
- Unit 4 First Floor, Burgess Industrial Estate, Parkhouse Street
- 39C Southampton Way, London, Southwark
- 39C Southampton Way, London, Southwark
- Flat 3, 63 Wells Way, London
- Flat 3, 63 Wells Way, London
- Flat 3, 59 Wells Way, London
- Flat 3, 59 Wells Way, London
- Flat 9, 63 Wells Way, London
- Flat 9, 63 Wells Way, London
- Flat 1, 73 Wells Way, London
- Flat 1, 73 Wells Way, London
- Flat 15, 59 Wells Way, London
- Flat 15, 59 Wells Way, London
- Flat 1, 63 Wells Way, London
- Flat 1, 63 Wells Way, London
- Flat 1, 45 Southampton Way, London
- Flat 1, 45 Southampton Way, London
- Flat 6, 83 Tower Mill Road, London
- Flat 6, 83 Tower Mill Road, London
- Flat 1, 83 Tower Mill Road, London
- Flat 1, 83 Tower Mill Road, London
- Flat 4, 83 Tower Mill Road, London
- Flat 4, 83 Tower Mill Road, London
- Rear Of, 35-39 Parkhouse Street, London
- Rear Of, 35-39 Parkhouse Street, London
- 83 Tower Mill Road, London, Southwark
- 83 Tower Mill Road, London, Southwark
- Communication Station On Chimney 9067, 14-40 Parkhouse Street, London
- Communication Station On Chimney 9067, 14-40 Parkhouse Street, London
- 69 Wells Way, London, Southwark
- 69 Wells Way, London, Southwark
- Flat 10, 59 Wells Way, London
- Flat 10, 59 Wells Way, London

- 18 Rainbow Street, London, SE57TD
- 4 Dowlas Street, Camberwell, London
- 47 Arments Court, 392 Albany Road, London
- 52 Vicarage Grove, London, SE5 7LP
- 13 Parkhouse Street,, London, SE5 7TQ
- 64 marchwood close, london, se5 7ex
- 109 wells way, London, SE57Sz
- 50 Coleman Road, Camberwell, London
- 38a Coleman road, London, Se5 7tg
- Flat 49, Otterburn House, Sultan Street, LONDON, SE5

0XE

- 131 Benhill Road, london, SE5 7LZ
- 129 Southampton Way, London, SE5 7EW
- 55 Leontine Close, London, SE15 1UH
- Ground Floor,, 55 Rye Hill Park, London
- Ground and Lower Ground Maisonette, 97 Camberwell

Grove, Camberwell, London

- 7 Dowlas Street, Camberwell, London
- 109, Wells Way, London
- 41 Southampton Way, London, SE5 7SW
- 23 Hambling Court, 42 Southampton Way, London
- 3a Parkhouse St, London, SE57TQ
- 160a Wyndham Road, London, SE5 0UB
- 135 John Ruskin Street, London, SE5 0PQ
- 6 claremont villas, southampton way, london
- 3a Parkhouse Street, London, SE5 7TQ
- Southwark Law Centre, 14-16 Hanover Park, Peckham,

16.03.2022

London

- 177 Cator Street, 177, London
  - 12a St Giles Road, Camberwell, London
- 52 Vicarage Grove, London, SE5 7LP
- 59 Wells Way, London, SE57UB
- 125 Bemhill Road, London, SE5 7LZ
- 132 Benhill Road, London, SE5 7LZ
- 19 Ayres Court, 74 New Church Road, Camberwell
- Flat 2, 113 Wells Way, London
- Flat 63, Evelina Mansions, New Church Road, London
- Flat 2 Petram house, London, Se17 1ft
- 207A, DEPTFORD HIGH STREET, LONDON

### **Re-consultation Letters to Neighbours and Local Groups:**

Recipient Address:

Date Letter Sent:

- 97 Colman Road, London, Se5 7tf
- Flat 13, Barrett Court, 1 Dobson Walk, London, SE5 7FL
- 119 Coleman Road, London, SE5 7TF
- 30 Rainbow Street, London, SE5 7TD

- 38 Kitson road, London, SE5 7LF
- 125 Benhill Road, London, SE5 7LZ
- 101 Wells Way, London, SE5 7SZ
- 40 Melbreak House, East Dulwich Estate, London
- Flat 6, 69 Camberwell Grove, London
- 30 Coleman Road, Camberwell, SE5 7TG
- Flat 4, 113 Wells Way, London, SE5 7SZ
- 5 Parkhouse Street, The Imperial City Camberwell London, SE5 7TQ
- 5 Parkhouse Street, The Imperial City Camberwell London, SE5 7TQ
- 117 coleman road, london, se5 7ff
- 13, Barrett, 1 Dobson Walk, London
- Burgess Park, London, SE5 0RJ
- 13A Parkhouse Street, London, Southwark
- Top Flat, 4 Claremont Villas, Southampton Way, London
- 103 Wells Way, London, SE5 7SZ
- 69 Coleman Road, LONDON, SE5 7TF
- 42 Camberwell Grove, London, SE5 8RE
- 25 Aylesbury Road, London, SE17 2EQ
- 86 Tower Mill Road, London, SE15 6BP
- 5a Parkhouse Street, Camberwell, SE5 7TQ
- Flat 2, 113 Wells Way, London
- 18 Rainbow Street, London, SE57TD
- Flat 5, 113 Wells Way, London, SE5 7SZ
- Flat 6 Fontenelle, Sceaux Gardens, London
- 25 Rainbow Street, London, SE5 7TB
- 146A Elmington Road, London, Se5 7RA
- 50 Coleman Rd, London, SE5 7TG
- 50 Coleman Rd, Camberwell, London
- Flat 2 South City Court, 52 Peckham Grove, London
- 7 Hodgkin Court, 2 Dobson Walk, Camberwell
- 128 Benhill Road, London, SE5 7LZ
- 11A Parkhouse Street, Camberwell, SE5 7TQ
- 18 Rainbow Street, London, SE57TD
- 4 Dowlas Street, Camberwell, London
- 47 Arments Court, 392 Albany Road, London
- 52 Vicarage Grove, London, SE5 7LP
- 13 Parkhouse Street,, London, SE5 7TQ
- 64 marchwood close, london, se5 7ex
- 109 wells way, London, SE57Sz
- 50 Coleman Road, Camberwell, London
- 38a Coleman road, London, Se5 7tg
- Flat 49, Otterburn House, Sultan Street, LONDON, SE5 OXE
- 131 Benhill Road, london, SE5 7LZ

06.03.2022

<ul style="list-style-type: none"> <li>• 129 Southampton Way, London, SE5 7EW</li> <li>• 55 Leontine Close, London, SE15 1UH</li> <li>• Ground Floor,, 55 Rye Hill Park, London</li> <li>• Ground and Lower Ground Maisonette, 97 Camberwell Grove, Camberwell, London</li> <li>• 7 Dowlas Street, Camberwell, London</li> <li>• 109, Wells Way, London</li> <li>• 41 Southampton Way, London, SE5 7SW</li> <li>• 23 Hambling Court, 42 Southampton Way, London</li> <li>• 3a Parkhouse St, London, SE57TQ</li> <li>• 160a Wyndham Road, London, SE5 0UB</li> <li>• 135 John Ruskin Street, London, SE5 0PQ</li> <li>• 6 claremont villas, southampton way, london</li> <li>• 3a Parkhouse Street, London, SE5 7TQ</li> <li>• Southwark Law Centre, 14-16 Hanover Park, Peckham, London</li> <li>• 177 Cator Street, 177, London</li> <li>• 12a St Giles Road, Camberwell, London</li> <li>• 52 Vicarage Grove, London, SE5 7LP</li> <li>• 59 Wells Way, London, SE57UB</li> <li>• 125 Bemhill Road, London, SE5 7LZ</li> <li>• 132 Bemhill Road, London, SE5 7LZ</li> <li>• 19 Ayres Court, 74 New Church Road, Camberwell</li> <li>• Flat 2, 113 Wells Way, London</li> <li>• Flat 63, Evelina Mansions, New Church Road, London</li> <li>• Flat 2 Petram house, London, Se17 1ft</li> <li>• 207A, DEPTFORD HIGH STREET, LONDON</li> </ul>	16.03.2022																		
<b>Consultation Letters to Internal Consultees:</b> No consultation was carried out with																			
<b>Re-consultation Letters to Internal Consultees:</b>																			
<table border="1"> <thead> <tr> <th>Name of Internal Consultee:</th> <th>Reply Received?</th> <th>Reply Received?</th> </tr> </thead> <tbody> <tr> <td>• Design and Conservation Team [Surgery]</td> <td>18.07.2022</td> <td><b>YES</b></td> </tr> <tr> <td>• Local Economy</td> <td>18.07.2022</td> <td>No</td> </tr> <tr> <td>• Ecology</td> <td>18.07.2022</td> <td><b>YES</b></td> </tr> <tr> <td>• Transport Policy</td> <td>18.07.2022</td> <td>No</td> </tr> <tr> <td>• Urban Forester</td> <td>18.07.2022</td> <td><b>YES</b></td> </tr> </tbody> </table>	Name of Internal Consultee:	Reply Received?	Reply Received?	• Design and Conservation Team [Surgery]	18.07.2022	<b>YES</b>	• Local Economy	18.07.2022	No	• Ecology	18.07.2022	<b>YES</b>	• Transport Policy	18.07.2022	No	• Urban Forester	18.07.2022	<b>YES</b>	
Name of Internal Consultee:	Reply Received?	Reply Received?																	
• Design and Conservation Team [Surgery]	18.07.2022	<b>YES</b>																	
• Local Economy	18.07.2022	No																	
• Ecology	18.07.2022	<b>YES</b>																	
• Transport Policy	18.07.2022	No																	
• Urban Forester	18.07.2022	<b>YES</b>																	
<b>Consultation Letters to External Consultees:</b> No consultation was carried out with																			
<b>Re-consultation Letters to External Consultees:</b>																			
<table border="1"> <thead> <tr> <th>Name of External Consultee:</th> <th>Reply Received?</th> <th>Reply Received?</th> </tr> </thead> <tbody> <tr> <td>• Environment Agency</td> <td>18.07.2022</td> <td>No</td> </tr> </tbody> </table>	Name of External Consultee:	Reply Received?	Reply Received?	• Environment Agency	18.07.2022	No													
Name of External Consultee:	Reply Received?	Reply Received?																	
• Environment Agency	18.07.2022	No																	

• Great London Authority	18.07.2022	No
• London Fire & Emergency Planning Authority	18.07.2022	No
• Natural England - London & South East Re	18.07.2022	No
• Metropolitan Police Service (Designing O	18.07.2022	<b>YES</b>
• Transport for London	18.07.2022	No
• Thames Water	18.07.2022	No

## Site Visit

<b>Case officer site visit date:</b>	03.12.2019 and 01.03.2022
--	---------------------------------



## Consultation responses received

### Internal services

Design and Conservation Team [Surgery]

Urban Forester

Ecology

Transport Policy

Design and Conservation Team [Surgery]

Ecology

Urban Forester

### Statutory and non-statutory organisations

Thames Water

Natural England - London & South East Re

London Fire & Emergency Planning Authori

Metropolitan Police Service (Designing O

Metropolitan Police Service (Designing O

### Neighbour and local groups consulted:

97 Colman Road London Se5 7tf

Flat 13, Barrett Court, 1 Dobson Walk  
London SE5 7FL

119 Coleman Road London SE5 7TF

30 Rainbow Street London SE5 7TD

38 Kitson road London SE5 7LF

125 Benhill Road London SE5 7LZ

101 Wells Way London SE5 7SZ

40 Melbreak House East Dulwich Estate  
London

Flat 6 69 Camberwell Grove London

30 Coleman Road Camberwell SE5 7TG

Flat 4, 113 Wells Way London SE5 7SZ

5 Parkhouse Street The Imperial City  
Camberwell London SE5 7TQ

5 Parkhouse Street The Imperial City  
Camberwell London SE5 7TQ

117 coleman road london se5 7tf

13, Barrett 1 Dobson Walk London

Burgess Park London SE5 0RJ

13A Parkhouse Street London  
Southwark

Top Flat, 4 Claremont Villas  
Southampton Way London

103 Wells Way London SE5 7SZ

69 Coleman Road LONDON SE5 7TF

42 Camberwell Grove London SE5 8RE

25 Aylesbury Road London SE17 2EQ

86 Tower Mill Road London SE15 6BP

5a Parkhouse Street Camberwell SE5  
7TQ

Flat 2 113 Wells Way London

18 Rainbow Street London SE57TD

Flat 5, 113 Wells Way London SE5 7SZ

Flat 6 Fontenelle Sceaux Gardens  
London

25 Rainbow Street London SE5 7TB

146A Elmington Road London Se5 7RA

50 Coleman Rd London SE5 7TG

50 Coleman Rd Camberwell London

Flat 2 South City Court 52 Peckham  
Grove London

7 Hodgkin Court 2 Dobson Walk  
Camberwell

128 Benhill Road London SE5 7LZ

11A Parkhouse Street Camberwell SE5  
7TQ

18 Rainbow Street London SE57TD

4 Dowlas Street Camberwell London

47 Arments Court 392 Albany Road  
London

52 Vicarage Grove London SE5 7LP

13 Parkhouse Street, London SE5 7TQ

64 marchwood close london se5 7ex

109 wells way London SE57Sz

50 Coleman Road Camberwell London

38a Coleman road London Se5 7tg

Flat 49, Otterburn House, Sultan Street  
LONDON SE5 0XE

131 Benhill Road london SE5 7LZ

129 Southampton Way London SE5  
7EW

55 Leontine Close London SE15 1UH

Ground Floor, 55 Rye Hill Park London

Ground and Lower Ground Maisonette  
97 Camberwell Grove Camberwell,  
London

7 Dowlas Street Camberwell London

109 Wells Way London

41 Southampton Way London SE5 7SW

23 Hambling Court 42 Southampton Way  
London

3a Parkhouse St London SE57TQ

160a Wyndham Road London SE5 0UB

135 John Ruskin Street London SE5  
0PQ

6 claremont villas southampton way  
london

3a Parkhouse Street London SE5 7TQ

Southwark Law Centre, 14-16 Hanover  
Park Peckham London

177 Cator Street 177 London

17 Hoptons Gardens Hopton Street  
London

Parkhouse St London SE5

28 Harris St London SE5 7NH

Addington Square London SE5

12a St Giles Road Camberwell London

52 Vicarage Grove London SE5 7LP

59 Wells Way London SE57UB

125 Bemhill Road London SE5 7LZ

132 Bemhill Road London SE5 7LZ

19 Ayres Court 74 New Church Road  
Camberwell

Flat 2 113 Wells Way London

Flat 63, Evelina Mansions New Church  
Road London

Flat 2 Petram house London Se17 1ft

207A DEPTFORD HIGH STREET  
LONDON

5A Parkhouse Stret Camberwell SE5  
7TQ

15c Southampton Way London SE5  
7SW

Ground and Lower Ground floor  
Maisonette 97 Camberwell Grove  
Camberwell

Coleman Road 69 SE5 7TF London



**APPENDIX 4****Planning History****Relevant Planning History**

No relevant planning history



This page is intentionally blank.

**OPEN**

**COMMITTEE:**

**PLANNING COMMITTEE**

**MUNICIPAL YEAR 2022-23**

**NOTE:**

Original held in Constitutional Team; all amendments/queries to Gregory Weaver, Constitutional Team, Tel: 020 7525 3667

**OPEN**

<b>COPIES</b>		<b>COPIES</b>	
<b>MEMBERS</b>		<b>PLANNING TEAM</b>	
Councillor Richard Livingstone (Chair)	1	Colin Wilson	1
Councillor Kath Whittam (Vice-Chair)	1	Stephen Platts	1
Councillor Ellie Cumbo	1		
Councillor Nick Johnson	1		
Councillor Richard Leeming	1		
Councillor Reggie Popoola	1		
Councillor Bethan Roberts	1		
Councillor Cleo Soanes	1		
		<b>COMMUNITY SAFETY AND ENFORCEMENT TEAM</b>	
		Sarah Newman	1
<b>Electronic Copies (No paper)</b>		<b>COMMUNICATIONS TEAM</b>	
Councillor Sam Foster (reserve)		Louise Neilan	
Councillor Jon Hartley (reserve)			
Councillor Sarah King (reserve)			
Councillor Sunny Lambe (reserve)			
Councillor Margy Newens (reserve)			
Councillor Sandra Rhule (reserve)			
Councillor Michael Situ (reserve)			
Councillor Emily Tester (reserve)			
		<b>LEGAL TEAM</b>	
		Sadia Hussain	1
		<b>CONSTITUTIONAL TEAM</b>	
		Gregory Weaver	5
<b>MEMBER OF PARLIAMENT (Paper and Electronic)</b>			
Helen Hayes MP, House of Commons, London, SW1A 0AA	1		
		<b>TOTAL PRINT RUN</b>	
			18

List Updated: 6 September 2022