

Planning Committee

Tuesday 4 October 2022

6.30 pm

Ground Floor Meeting Room G02 - 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 or please contact the person below.

Contact: Gerald Gohler on 020 7525 7420 or email: gerald.gohler@southwark.gov.uk

Members of the committee are summoned to attend this meeting

Althea Loderick

Chief Executive

Date: 26 September 2022



Planning Committee

Tuesday 4 October 2022

6.30 pm

Ground Floor Meeting Room G02 - 160 Tooley Street, London SE1 2QH

Order of Business

Item No.	Title	Page No.
1.	APOLOGIES	
	To receive any apologies for absence.	
2.	CONFIRMATION OF VOTING MEMBERS	
	A representative of each political group will confirm the voting members of the committee.	
3.	NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT	
	In special circumstances, an item of business may be added to an agenda within five clear days of the meeting.	
4.	DISCLOSURE OF INTERESTS AND DISPENSATIONS	
	Members to declare any personal interests and dispensations in respect of any item of business to be considered at this meeting.	
5.	DEVELOPMENT MANAGEMENT	1 - 4
5.1.	PLOT H1 ELEPHANT PARK, LAND BOUNDED BY WALWORTH ROAD, ELEPHANT ROAD, DEACON STREET AND SAYER STREET NORTH, ELEPHANT AND CASTLE, LONDON SE1	5 - 255
5.1.	ILDERTON WHARF, 1-7 ROLLINS STREET, LONDON SE15 1EP	256 - 390

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

Item No.

Title

Page No.

EXCLUSION OF PRESS AND PUBLIC

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

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

Date: 26 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**.

- | |
|---|
| <ol style="list-style-type: none">(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 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

Item No. 5.	Classification: Open	Date: 4 October 2022	Meeting Name: Planning Committee
Report title:		Development Management	
Ward(s) or groups affected:		All	
From:		Proper Constitutional Officer	

RECOMMENDATIONS

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

BACKGROUND INFORMATION

4. The council's powers to consider planning business are detailed in Part 3F which describes the role and functions of the planning committee and planning sub-committees. 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 Levelling Up, Housing and Communities and any directions made by the Mayor of London.
 - b. To give observations on applications in respect of which the council is not the planning authority in planning matters but which relate to site(s) within the borough, or where the site(s) is outside the borough but may affect the amenity of residents within the borough.
 - c. To receive for information any reports on the previous determination of applications, current activities on site, or other information relating to specific planning applications requested by members.

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

Community impact statement

11. Community impact considerations are contained within each item.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Director of Law and Governance

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

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 the Southwark Plan which was adopted by the council in February 2022. The Southwark Plan 2022 was adopted after the London Plan in 2021. For the purpose of decision-making, the policies of the London Plan 2021 should not be considered out of date simply because they were adopted before the Southwark Plan 2022. London Plan policies should be given weight according to the degree of consistency with the Southwark Plan 2022.
16. The National Planning Policy Framework (NPPF), as amended in July 2021, is a relevant material consideration and should be taken into account in any decision-making.
17. Section 143 of the Localism Act 2011 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.
18. "Regulation 122 of the Community Infrastructure Levy regulations (CIL) 2010 as amended, 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."

19. 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.

BACKGROUND DOCUMENTS

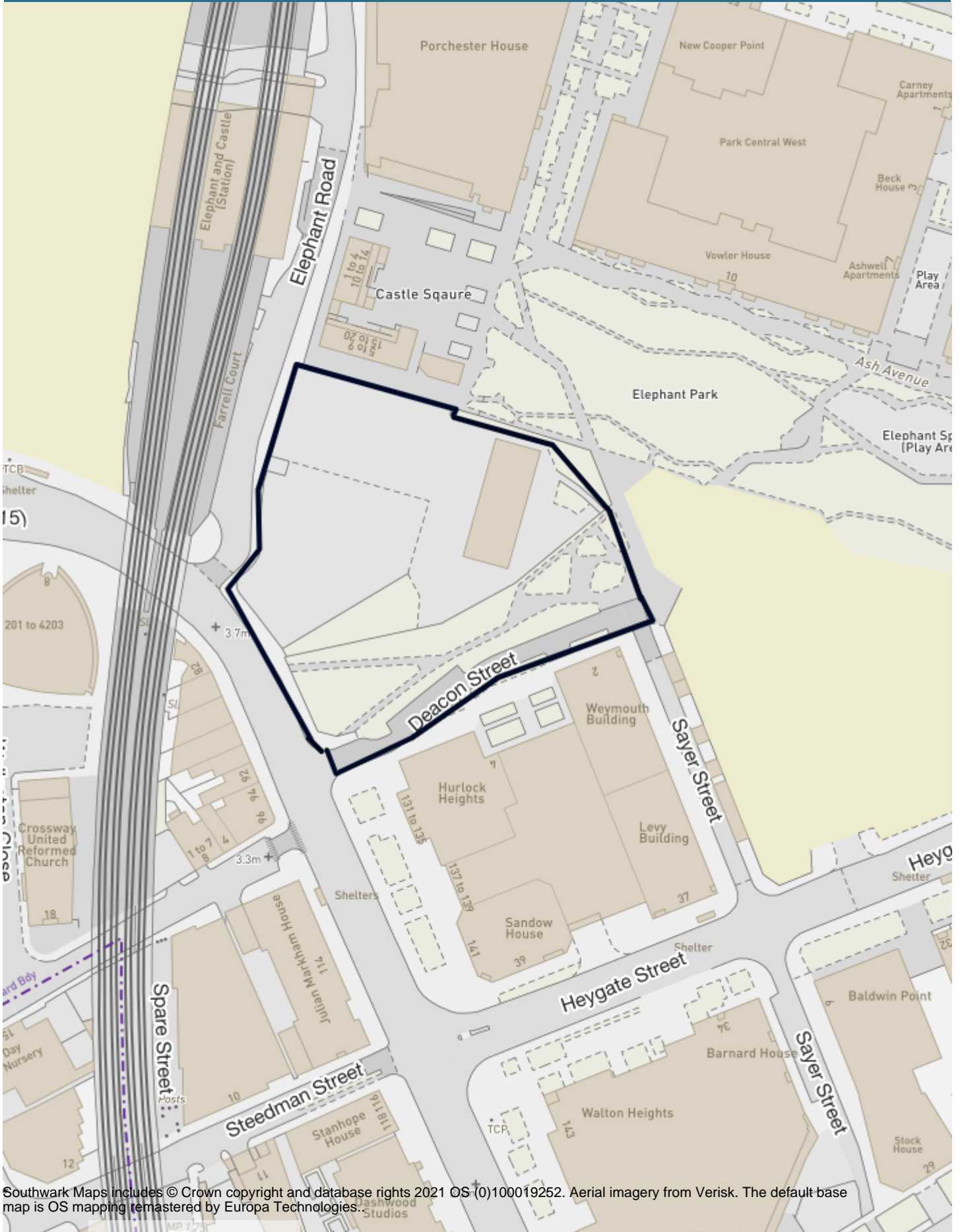
Background Papers	Held At	Contact
Council assembly agenda 23 May 2012	Constitutional Team 160 Tooley Street London SE1 2QH	Virginia Wynn-Jones 020 7525 7055
Each planning committee item has a separate planning case file	Development Management 160 Tooley Street London SE1 2QH	Planning Department 020 7525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

APPENDICES

No.	Title
None	

AUDIT TRAIL

Lead Officer	Chidilim Agada, Head of Constitutional Services	
Report Author	Gregory Weaver, Constitutional Officer Nagla Stevens, Deputy Head of Law (Planning and Development)	
Version	Final	
Dated	23 September 2022	
Key Decision?	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments sought	Comments included
Director of Law and Governance	Yes	Yes
Director of Planning and Growth	No	No
Cabinet Member	No	No
Date final report sent to Constitutional Team		23 September 2022



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Item No. 5.1	Classification: Open	Date: 4 October 2022	Meeting Name: Planning Committee
Report title:	<p>Development Management planning application: Application 21/AP/1819 for: Full Planning Application</p> <p>Address: PLOT H1 ELEPHANT PARK, LAND BOUNDED BY WALWORTH ROAD, ELEPHANT ROAD, DEACON STREET AND SAYER STREET NORTH, ELEPHANT AND CASTLE, LONDON, SE1.</p> <p>Proposal: Redevelopment of the site to provide an 18-storey building (including a mezzanine floor) plus basement and rooftop plant providing office floorspace (Class E(g)(i)) and areas of floorspace for the following flexible uses; office/retail/services/food and drink/medical or health floorspace (Class E(g)(i), E(a), E(c), E(b) or E(e)), including ancillary cycle parking, accessible car parking, servicing, plant, roof terraces, landscaping, public realm improvements and other associated works incidental to the development.</p> <p>The application is accompanied by an Environmental Statement submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.</p>		
Ward(s) or groups affected:	North Walworth		
From:	Director of Planning and Growth		
Application Start Date	04/06/2021	PPA Expiry Date	n/a
Earliest Decision Date	20/1/2022		

RECOMMENDATIONS

1. That planning permission be granted subject to conditions, the applicant entering into an appropriate legal agreement, and referral to the Mayor of London; 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 outline 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 the planning permission, the director of planning and growth shall place a statement on the statutory register pursuant to regulation 28 of the Town and Country Planning (Environmental Impact Assessments) Regulations and for the purposes of regulation 28(1)(h) the main reasons and considerations on which the local planning authority's decision is based shall be set out as in this report; and
6. In the event that the requirements of paragraph 1 above are not met by 4 April 2023 the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 429 of this report.

EXECUTIVE SUMMARY

7. A full planning application has been submitted for this last plot, Plot H1, of the Elephant Park masterplan as it exceeds the approved parameters and floorspace restrictions of the outline planning permission (OPP) ref. 12/AP/1092 for the redevelopment of the Heygate Estate. Plot H1 is on the western side of the masterplan, bound by Walworth Road to the west, Elephant Road to the north-west, Castle Square to the north, park to the north-east, and the new Sayer Street and Deacon Street to the east and south respectively. It proposes an office-led development of an 18-storey building, with a health centre or affordable workspace, a lobby area (which would have public access) and flexible use units for retail, restaurants, professional services, health or offices. Landscaped public realm around the building, a central servicing yard and highway works to Deacon Street are also proposed.
8. Over 430 objections were received in response to the first consultation. Common topics of the objections were:
 - the principle of the office use as there is no demand or need for office space;
 - the plot should be used to provide more homes (especially affordable homes) instead;
 - the building is too large, tall and unattractive;
 - it will harm neighbour amenity;
 - it will overshadow the park and harm ecology;
 - the additional traffic and public transport crowding;
 - environmental impacts;
 - strain on community facilities; and
 - the lack of community engagement by the applicant.
9. Two neutral comments were received. Over 50 comments in support were made that:
 - the proposal would add to the mix of uses in the masterplan, provide jobs, commercial space, a health hub, public atrium, activity and help support the local area;
 - the height and design are appropriate for this location;
 - it provides public realm and landscaping; and
 - it is a sustainable location.

10. The applicant made amendments to the proposal in December 2021, primarily to amend the design of two façades of the building by adding “creases” and four terraces. Further information on the health hub was provided, and some of the supporting documents were updated. The re-consultation on the amendments resulted in 39 further objections (stating that the amendments do not address the earlier objections, repeating other issues, and raising objections in terms of the relationship with the OPP masterplan’s obligations) and two comments in support.
11. The OPP approved Plot H1 as a residential-led scheme with the option for the upper levels to be used for offices, community and leisure uses to the upper floors. The rest of the Elephant Park masterplan will exceed the minimum residential floorspace of the OPP (by 91,835sqm) and uses almost the maximum residential floorspace approved in the OPP. An office-led development is supported by policies for this location which is within the Central Activities Zone, Opportunity Area, town centre, close to the public transport options and with a PTAL of 6b. A health hub use is also supported by policies and may be provided, which would be as an alternative to affordable workspace. Retail uses are encouraged by policy for this town centre location and would continue the mix of uses along Walworth Road and Sayer Street.
12. The OPP for the Elephant Park masterplan approved a residential tower of similar height on this plot; the current proposal is approximately 3m taller and has increased massing however it would add a distinctive building which would contribute positively to the townscape of the masterplan and wider Elephant and Castle area. The building responds to the policy expectations for tall buildings in terms of its location, architecture and public realm, creating public realm around its base and public access to a lobby at the ground floor. It would not cause harm to heritage assets, and preserves the ability to appreciate the Outstanding Universal Value of the Westminster World Heritage Site.
13. The proposal would not cause a significant loss of privacy, and with conditions would not cause significant noise impacts. Any harm to neighbour amenity identified is due to the loss of daylight and overshadowing to certain properties, and must be considered in the wider planning balance. To address the transport and highways impacts a package of highway works, public realm works, financial contributions and servicing management measures are proposed as planning obligations.
14. The proposal incorporates cross-laminated timber to reduce the amount of concrete and metal needed in its construction. It would achieve an “outstanding” BREEAM rating, a 38% reduction in carbon emissions (including connecting to the existing Elephant Park heating network), and meets the whole life carbon and circular economy policy requirements.
15. The environmental information submitted with the application has been considered in the assessment of the proposal and its expected impacts. The application is recommended for approval, as subject to conditions and completion of a legal agreement the development would comply with the development plan, and the decision is subject to the Stage 2 referral to the Mayor of London.

Planning Summary – Tables

Commercial

Use Class	Existing sqm	Proposed sqm	Change +/-
Use Class E (g) (i) office	0	40,181 (NIA)	+40,181
Use Class E (g)(i) office or Use Class E(e) health	0	4,301 (NIA)	+4,301
Use Class E(g)(i), E(a), E(c) and E(e) as offices/retail/services/health	0	259 (NIA)	+259
Use Class E(g)(i), E(a), E(c), and E(b) as offices/retail/services/restaurant	0	1,659(NIA)	+1,659
Affordable workspace Use Class E	0	From 4,488sqm (NIA) up to 4,640sqm (NIA) on site (to maintain provision at 10% of total office area)	+4,488 (minimum) unless a health hub is provided
Jobs	0 permanent jobs	Approximately 3,405-3,866 estimated full time equivalent jobs	+ Approx. 3,405-3,866 estimated full time equivalent jobs

Public realm

	Existing sqm	Proposed sqm	Change +/-
Public realm	17,000	39,000	+22,000

Environmental

CO2 savings beyond part L Building Regs	38%
Trees lost	2 x Class C
Trees gained	18

	Existing	Proposed	Change +/-
Urban Greening Factor	(unknown)	0.351	N/A
Greenfield Run Off Rate	128.8 l/s	14 l/s	-114.8 l/s
Green/Brown Roofs	0sqm	567sqm	+567sqm
EVCPs (on site)	0	1 EVCP for two spaces	+1 (two spaces)
Cycle parking spaces	0	855 long-stay 96 short-stay	+951

CIL and S106

Southwark CIL (estimated)	£299,151.40
MCIL (estimated)	£3,801,279.27
S106	£3,469,401.48

BACKGROUND INFORMATION

Site location and description

16. Plot H1 is a five-sided site at the western edge of the Elephant Park masterplan, bounded by Walworth Road and Elephant Road (with the railway viaduct and station) to the west, Deacon Street to the south, and the park and Castle Square to the north and east. It has an area of 0.78 hectares. The location of the plot is shown in red below, and the boundary of the Elephant Park masterplan is shown by the blue line.



17. The site currently contains temporary construction offices and has a temporary “urban farm” with its shipping containers. The northern part is surrounded by hoarding. There is a line of retained, mature street trees on the Walworth Road side. The southern part of the site alongside Deacon Street has been set out with temporary landscaping, wildflower planting and play features.



Part of the site's Elephant Road frontage, showing the urban farm and two blocks of Plot H2 in the centre/right hand side.



Part of the site's southern frontage, looking along Deacon Street, with Plot H2 on the right hand side, Plot H4 and H5 in the distance.

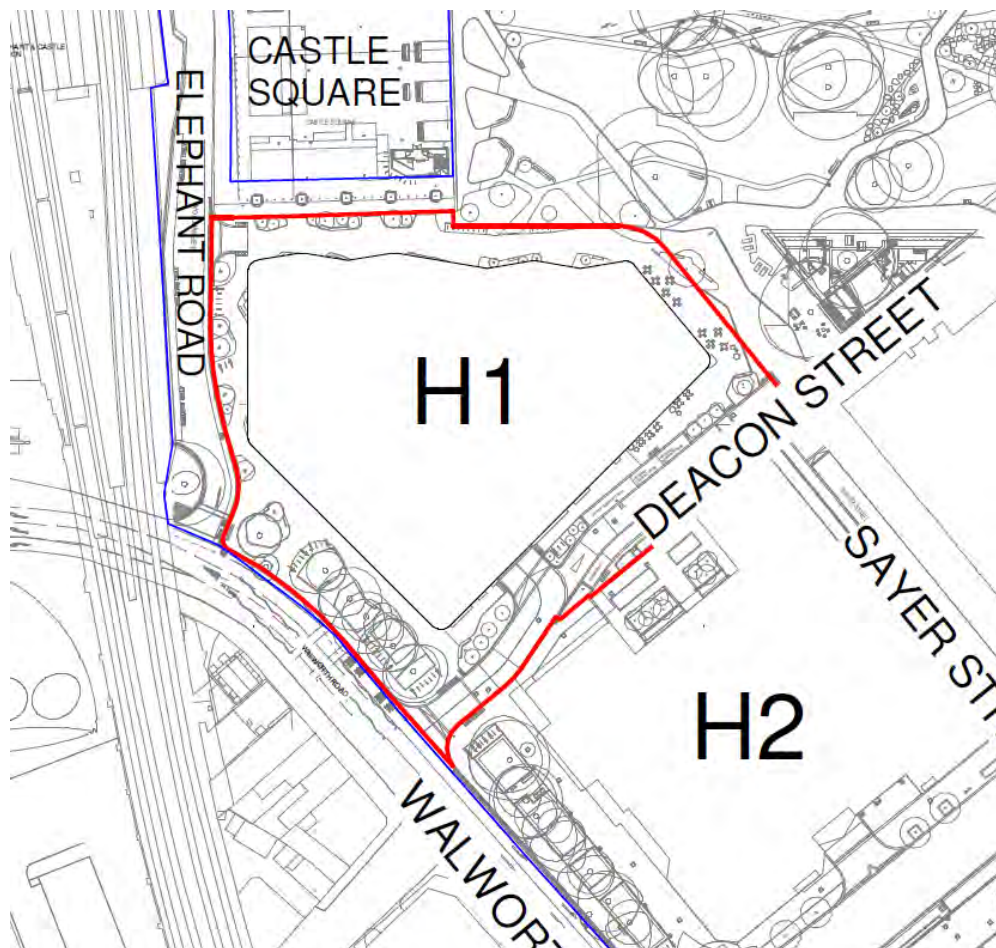
18. Nearby plots of Elephant Park have been constructed including Plot H2 to the immediate south, and Plots H4 and H5 to the north-east on the other side of the new central park. The park pavilion has been constructed to the east of Plot H1. Construction has started on Plot H7 to the south-east of the site. Castle Square contains temporary shops in a three storey building plus public realm and landscaping. Further north are the linked towers of Mawes House, Tantallon House and Portchester House.
19. On the western side of the site are the railway viaduct and the train station on Elephant Road, the Elephant and Castle Shopping Centre (recently demolished), Strata tower and lower Victorian properties on the western side of Walworth Road. These, along with the site are within the Central Activities Zone (CAZ), Elephant and Castle town centre and Opportunity Area. The site is within the Elephant and Castle Strategic Cultural Quarter.
20. The site is approximately 180m to the north of the Walworth Road Conservation Area and the grade II listed buildings of the Southwark municipal offices

(Walworth Town Hall), library and clinic buildings on Walworth Road and nos. 140, 142, 150 and 152 Walworth Road. The site is within the wider setting consultation area of the LVMF view 23A.1 from the centre of the bridge over of the Serpentine to the Palace of Westminster, which itself is a World Heritage Site.

21. With its proximity to the train station, Underground station and bus services, the site has a PTAL of 6b which is the highest level. It is within the air quality management area, flood zone 3 and small parts of the east and southern sides of the site are at risk of surface water flooding.

Details of proposal

22. This is a full planning application which proposes the redevelopment of Plot H1 with a commercial building and the surrounding landscaping, public realm and highway works. The application site red line comprises the Plot H1 of the 2013 OPP parameter plans, but also extends further south to overlap with part of Plot H2 due to the works proposed on Deacon Street.



Proposed site plan

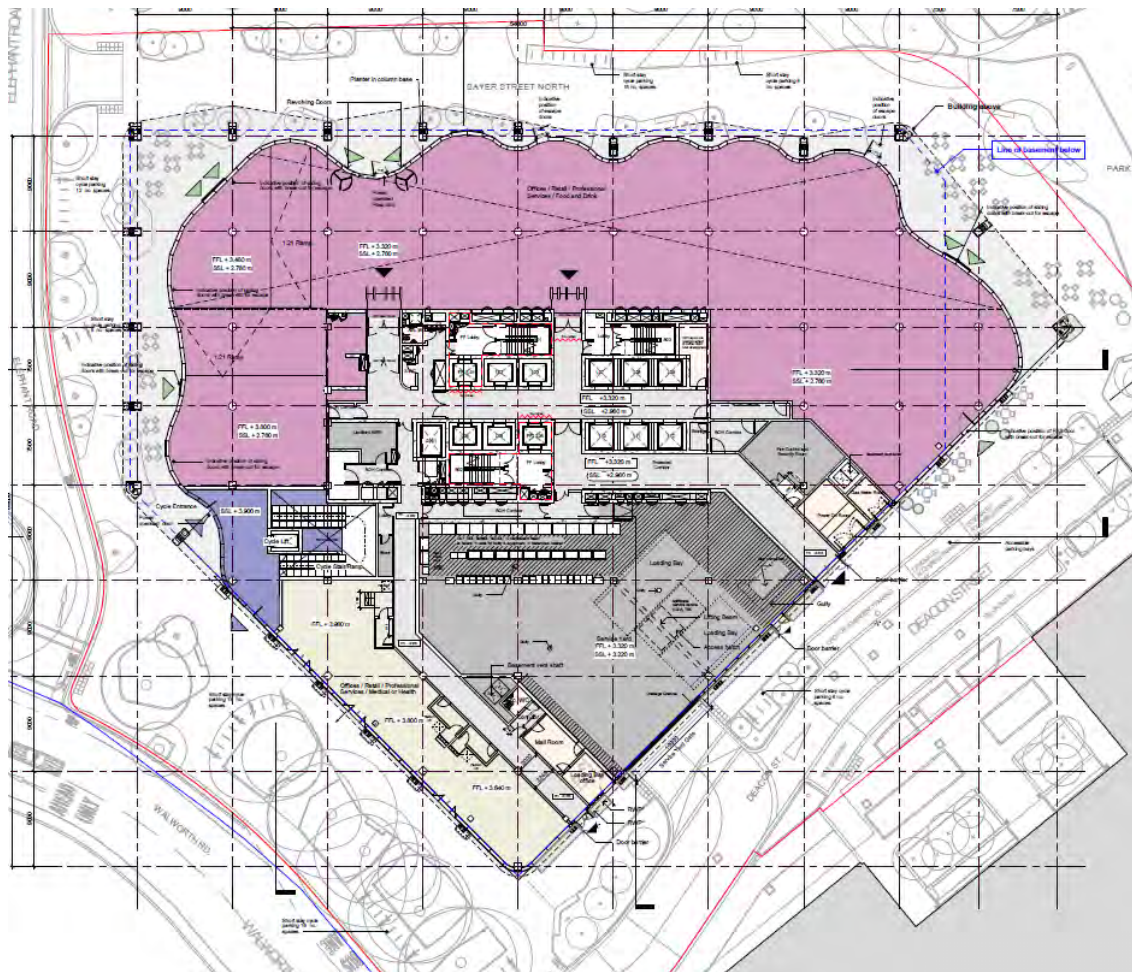
23. The application proposes an 18-storey building (including a mezzanine floor) plus two basement levels and rooftop plant at a maximum height of 85.73m AOD. The building would provide 48,960sqm (GEA) of office floorspace (Class E(g)(i)) to the upper floors. The mezzanine and first floor levels could be used for either additional office floorspace or a health centre (Class E(e)). A range of flexible uses is sought for the ground floor: offices, retail, professional services, health

and restaurants (Classes E(g)(i), E(a), E(c), E(b) and E(e)). Ancillary spaces include the double basement, ground floor servicing yard and roof level plant. The table below sets out the proposed areas for the different uses.

Table: Floorspace schedule

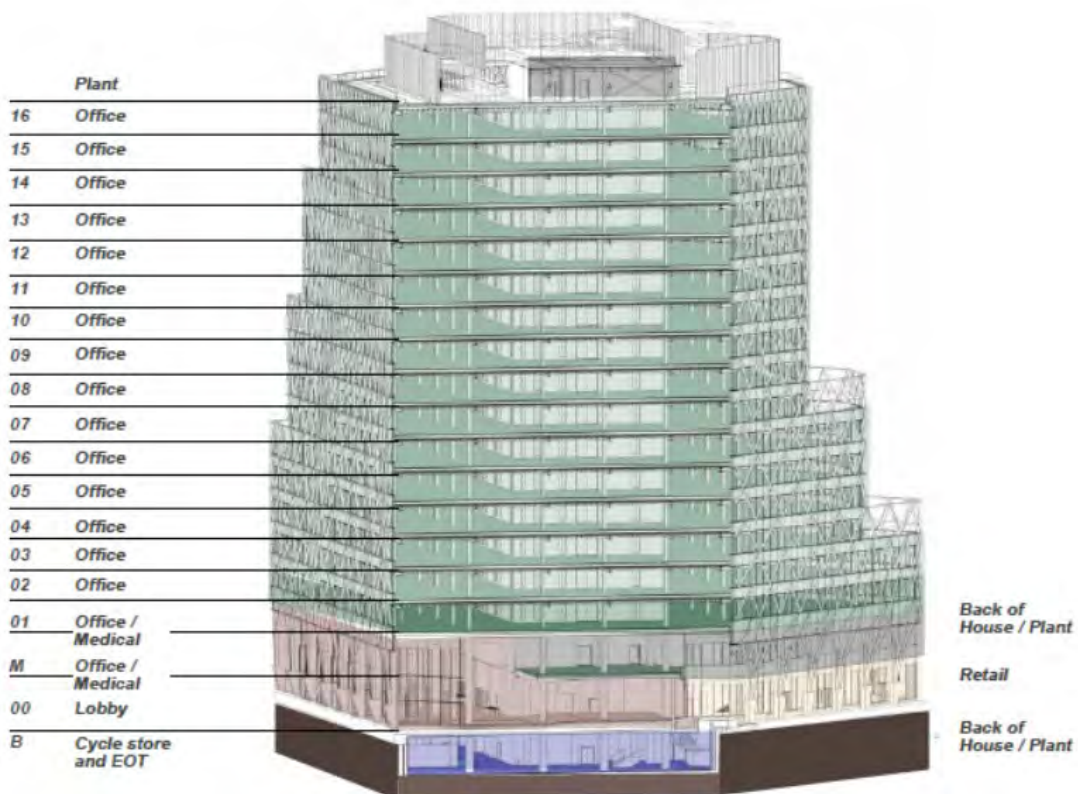
Land Use	Floor level of the building	NIA (sqm)	GIA (sqm)	GEA (sqm)
Offices	2-16	40,181	48,750	48,960
Offices or health	Mezzanine and 1	4,301	6,729	6,796
Offices/retail/services/health	Ground	259	264	277
Offices/retail/services/restaurant	Ground	1,659	1,664	1,704
Ancillary (servicing yard, cycle storage, plant)	Basement, ground and roof	n/a	5,566	6,258
Total	All	46,400	62,974	63,996

24. The diagram below shows the proposed ground floor layout, surrounding landscaping and Deacon Street layout. Within the building, the pink area would form the “active lobby” as a mix of office, retail, professional and restaurant uses accessed by a series of doors within the curved frontages. The blue area on the western side would be the basement cycle store entrance. The pale green area on the south-western edge is proposed as a flexible use of offices, retail, professional services or health use opening onto Walworth Road. The areas in grey are the internal servicing yard, and central lift and stair cores.



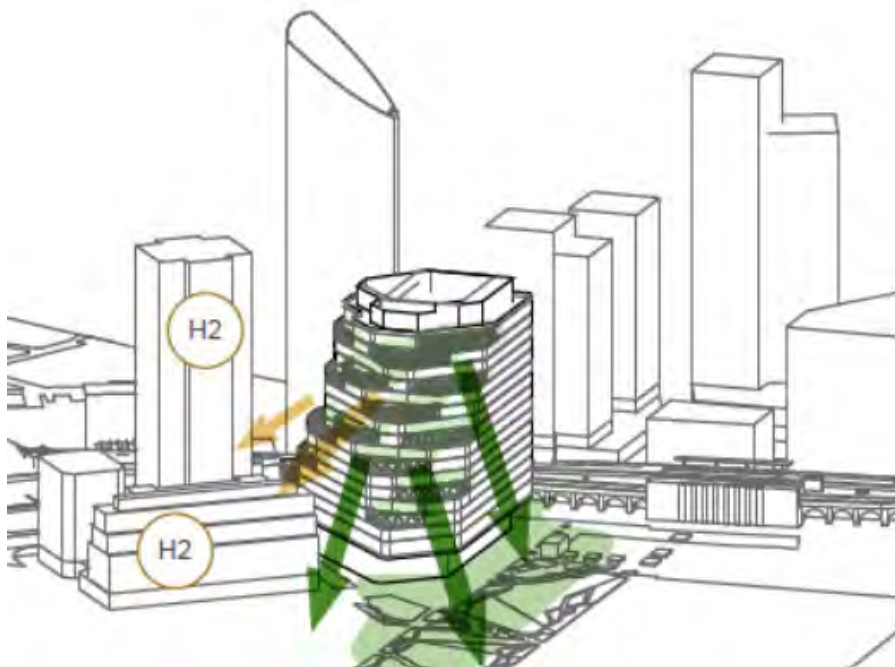
Proposed ground floor layout

25. The “active lobby” is intended to be a public amenity, with activities in an open and welcoming space, available seven days a week to the wider community and a flexible use of offices, retail, services and food and beverage is sought. It would link with the park and provide opportunities to meet, eat and drink or work, and could host events and exhibitions as additional reasons to draw people in. The division of these uses into areas/units around the edge and the extent of the publicly accessible lobby is only shown illustratively and would need to be provided at a later stage (pursuant to an obligation). The applicant’s vision for the lobby is for it to provide:
- A central zone as the open, hall-like civic space for people to meet and be the arrival for the offices above.
 - A park zone on the eastern side to extend the food and drink offer along Sayer Street into Plot H1, looking towards the pavilion and park with spill out space in the colonnade.
 - The Elephant Road zone on the western side as further retail, food and beverage or services facing the busier pedestrian routes to the stations, again with potential spill out space in the colonnade.
26. The upper levels of the proposed building would be accessed through the lobby. The mezzanine and first floor levels would provide either affordable workspace or a health hub. From second floor upwards, the building would be office space. The design allows a diverse range of businesses to be accommodated, by one organisation as a headquarters, to start-ups, scale-ups, grassroot charities and social enterprises.



Section drawing showing the arrangement of uses through the building floors

27. The applicant considers that this site in zone 1 with excellent transport connections, close to major educational institutions (UAL, LCC, LSBU) in Elephant and Castle and the Opportunity Area with other redevelopments within the town centre to form an emerging location for businesses. The applicant intends for the proposal to present *“an opportunity to create future focused workspace within an architecturally exciting and sustainable building that allows innovative and dynamic occupiers to reflect their brand identity and corporate culture”*.
28. In terms of the massing of the proposal, the building would step up from four-storeys in its south-western and south-eastern corners using a series of roof terraces and set backs to reach a height of 85.7m AOD (18 storeys) on its northern side. It would measure 89.5m east to west at its widest point, and 71m north to south at its widest. Its general massing is shown in the schematic diagram below, with visuals later in this report.

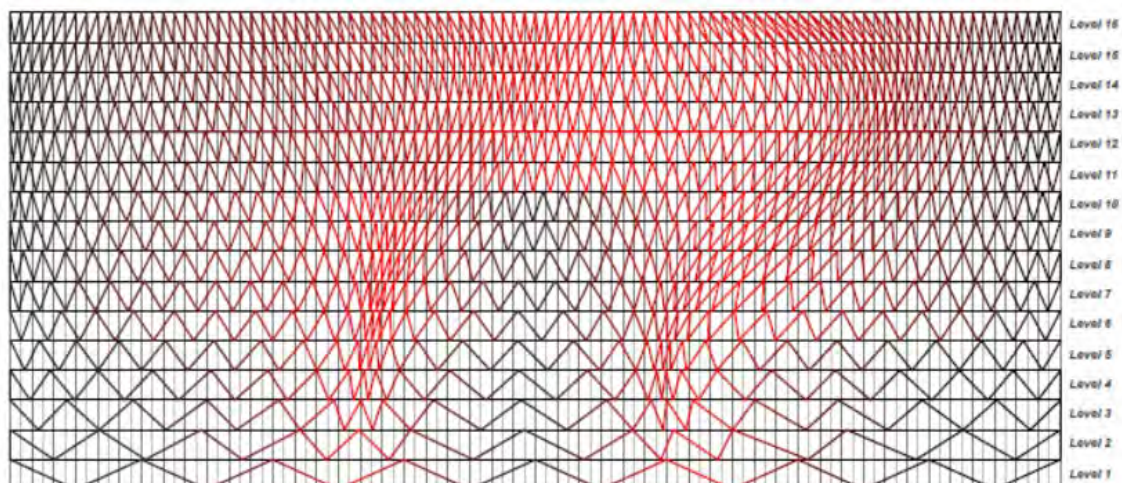


Visual to show how the stepped massing on the eastern side reduces and allows terraces to be provided



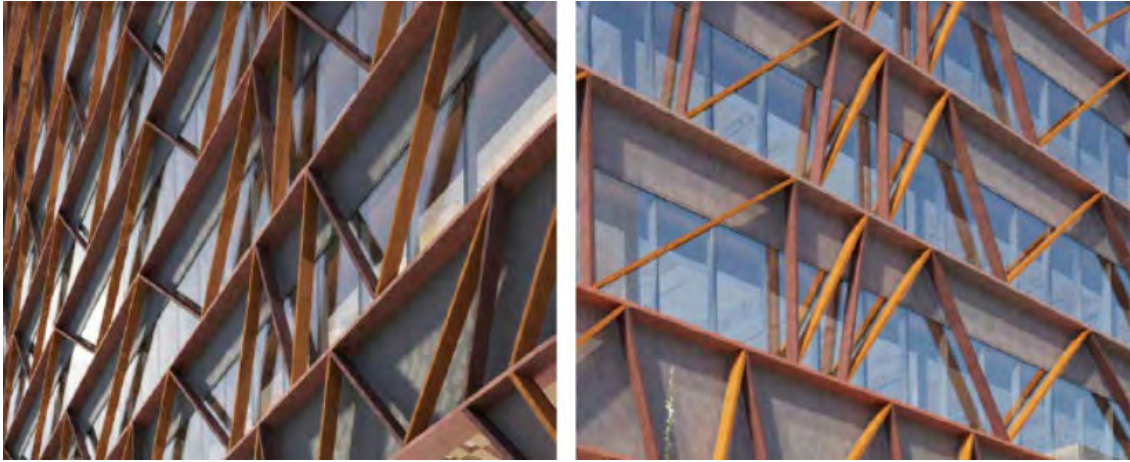
Visual showing the proposal viewed from Walworth Road to the west

29. The building would use cross-laminated timber (CLT) as its primary component with metal supports, to give a more sustainable construction and which allows flexibility in the layouts by removing floor panels to create voids or staircases between floors.
30. The architect's concept for the façades has taken inspiration from railway and tram lines, and Michael Faraday's studies on electromagnetism and magnetic fields. The façades would have a "veil" layer of inclined aluminium fins, set horizontally and diagonally across each elevation, in front of the glazing to give depth and provide solar shading. The orientation and density of the fins would vary across each façade and around the building as suggested by this concept diagram:



Concept diagram for the pattern of fins

31. Three different colours are suggested for the fins, with the colour palette chosen to reflect the burnt red and russet shades found in the nearby brick facades and the colour of core-ten and old steel. This would give the building a slightly different appearance when viewed from different angles and directions.



Example visuals of the concentration and colourings of the fins

32. The fins continue around all the curved corners of the building, the roof terraces and beneath the projecting terraces. The addition of the vertical “creases” and terraces to the northern and western façades of the building in the revised design provide further articulation to these sides, as shown in the visual below.



Proposed northern façade as viewed from Elephant Road

33. At ground level, a 9.4m high colonnade around the western, northern and north-eastern facades would be formed behind the metal columns of the building above, and in front of the recessed, curved, glazed frontages at ground level. The frontages would be fully glazed on the northern elevation and partly glazed at mezzanine level to the other two frontages. The architects have taken design ideas from Victorian shopfronts, with decorative paving and pendant lighting to the colonnade and active lobby, signage zones and awnings. On the Deacon Street frontage, the flexible use units would extend around each corner while the middle of the frontage would provide the servicing yard access, plant and metal louvres from ground level to the first floor.



Visual of the colonnade, frontage and planting on the northern side



Deacon Street frontage show the end units and central servicing yard and plant

34. The two proposed basement levels would provide various plant rooms and staff cycle parking, which is detailed later.
35. The roof top plant and building maintenance unit (BMU) would be screened by 6m and 7m high screening.

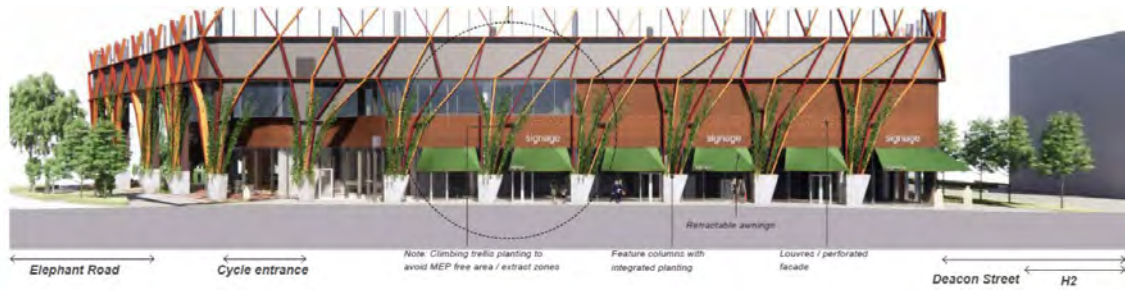
Landscaping and planting

36. The building would be surrounded by public realm on all sides, with trees (retained and new), shrubs and planting as shown in the diagram below. Cycle stands and timber benches are proposed at the edge of the planters. The Walworth Road and Elephant Road widened pavement areas would be in silver granite slabs, while the Sayer Street northern and eastern sides closer to the park would be in natural stone or clay brick paving.



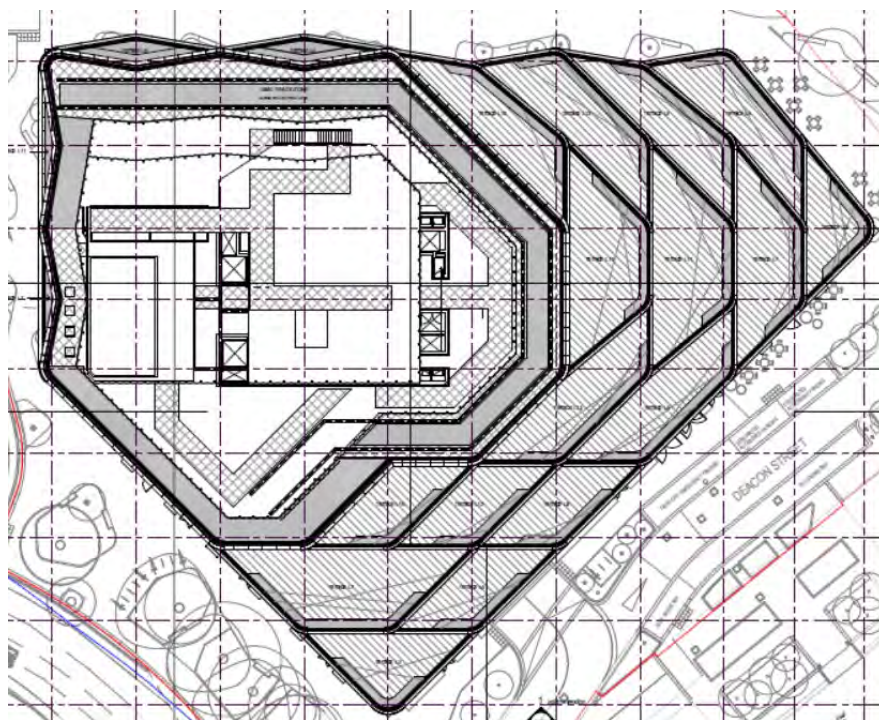
Proposed ground floor public realm and planting

37. Eight mature trees on the Walworth Road frontage have been retained during the Elephant Park redevelopment. Of these six are proposed to be retained, one is proposed to be removed and one more may be removed (both are category C trees). Five trees recently planted as part of the Plot H2 landscaping on the southern side of Deacon Street would be removed and replanted elsewhere on Deacon Street; 4 on the northern side of the road next to Plot H1, and one on the southern side next to Plot H2. 17 new trees are proposed on the northern side, along Elephant Road and at the eastern end of Deacon Street.
38. Around the base of the building, climbing plants would be encouraged to grow up the columns to give a “tree-like” appearance, such as on the Deacon Street frontage (where the planting would provide some screening to the louvres above and next to the servicing yard entrance) and Walworth Road frontage shown below.



Walworth Road frontage

39. Further up the building, a series of 16 roof terraces is proposed on the eastern and southern sides for use by staff. These would have planters at their outer edges with plants encouraged to grow up the frame and across the facades, as well as lower level planting, seating and permanent irrigation. They aim to provide a visual link of greenery from the top of the building down to the park.



Proposed roof plan showing the terraces

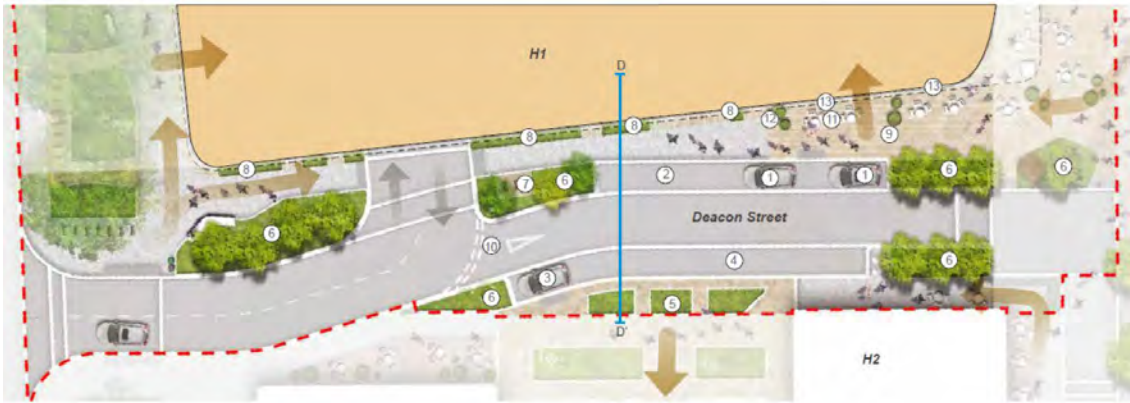


Visual of the building viewed from the north-east showing the upper floors and stepped roof terraces

40. The façade fins wrap around to partly enclose these terraces. Four smaller terraces are included, two on the northern façade and two on the western façade.
41. The roof of the building would include a strip of biodiverse roof planting around the edges of the central plant area. It would include log piles, bird and brick boxes as ecological enhancements.

Servicing and parking

42. An enclosed servicing yard in the centre of the ground floor would be accessed from Deacon Street. It would provide 3 loading bays, turning space, and an area for refuse bins. A small office and mail room are proposed next to the service yard entrance.
43. The proposed highway works would amend the existing layout of Deacon Street which is not an adopted highway and is currently one-way west-bound only. A loading bay and blue badge space currently on the northern side of the road would be re-provided on the southern side in front of Plot H2 for use by vehicles accessing Plot H2. A bay on the northern side would be set out as a drop off bay and two blue badge spaces for Plot H1. The western end of Deacon Street would change from the current one-way to become a two-way road. The tree planting and landscaping already installed on Deacon Street therefore would be revised, with recently planted trees being relocated.

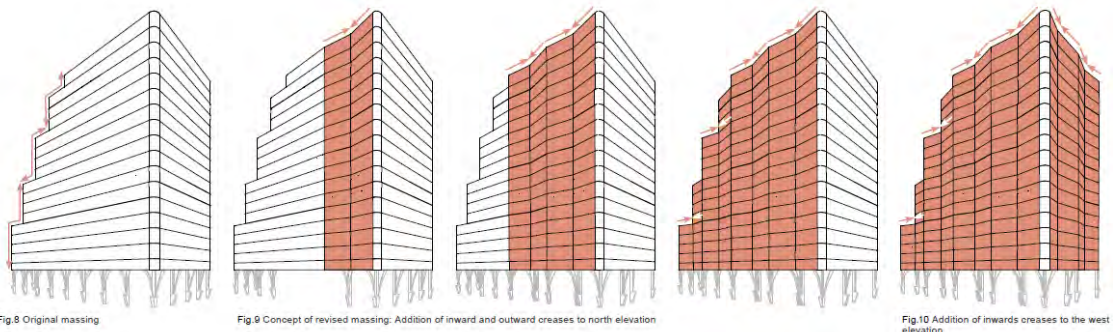


The proposed rearrangement of Deacon Street to create a new bay and revise the existing tree planting

44. The route leading from Elephant Road around the northern side of the building across to link to Sayer Street/Deacon Street on the eastern side of the plot would provide emergency vehicle access, and continue the cycle link into Sayer Street. Bollards would control vehicles wanting to use this route, but allow cyclists and pedestrians through.
45. The lower basement level would provide cycle parking, showers and lockers for staff accessed by a cycle ramp or by a lift on the Walworth Road side of the building. The upper basement level would provide further cycle parking, accessed from the same cycle ramp. A total of 855 staff cycle spaces are proposed as a mix of Sheffield stands, double stackers and folding bike lockers. Visitor cycle stands are proposed along the Walworth Road public realm, and on the northern side of the building.

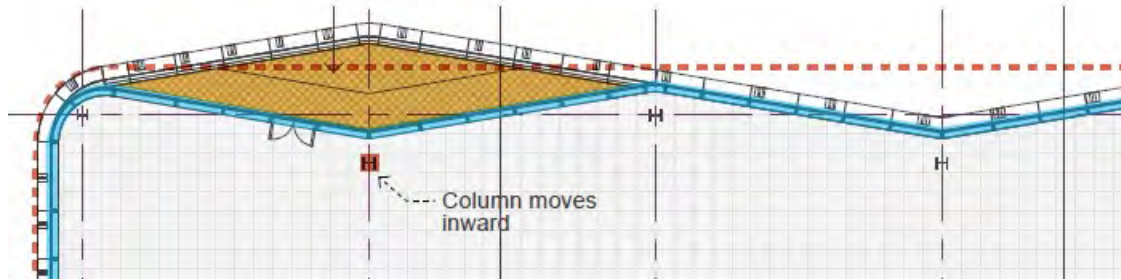
Amendments to the application

46. The design of the building was amended on its northern and western façades to include a series of ridges and “creases” the full height of the building to give articulation across these wide façades. Sections of the façade would step in, while others would step out to achieve this appearance. The original scheme is shown in the left-hand schematic below, and the amended creased version on the right-hand side.



Schematics of the articulation across the northern and western façades

47. Four terraces would be provided within some of these creases to sit on top of an outward crease and below the inward crease of the upper floors, as shown on the floorplan and schematics below.



Example floorplan showing how one of the larger terraces would be created by stepping out, and the creases stepping in.

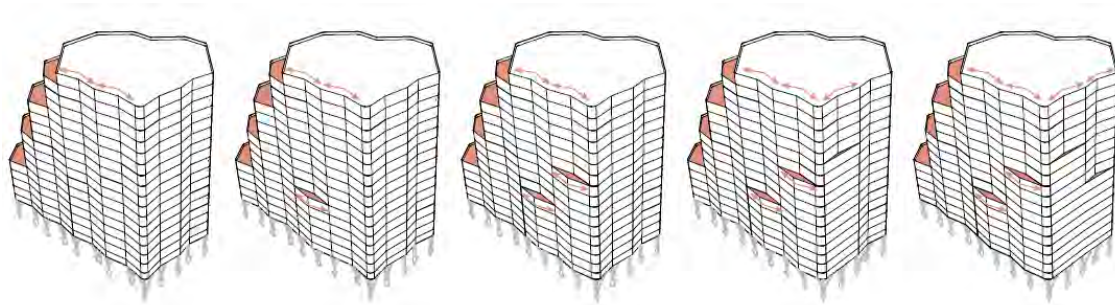


Fig.11 Introduction of inward creases

Fig.12 Inversion of inward to outward creases to create a terrace at level L05

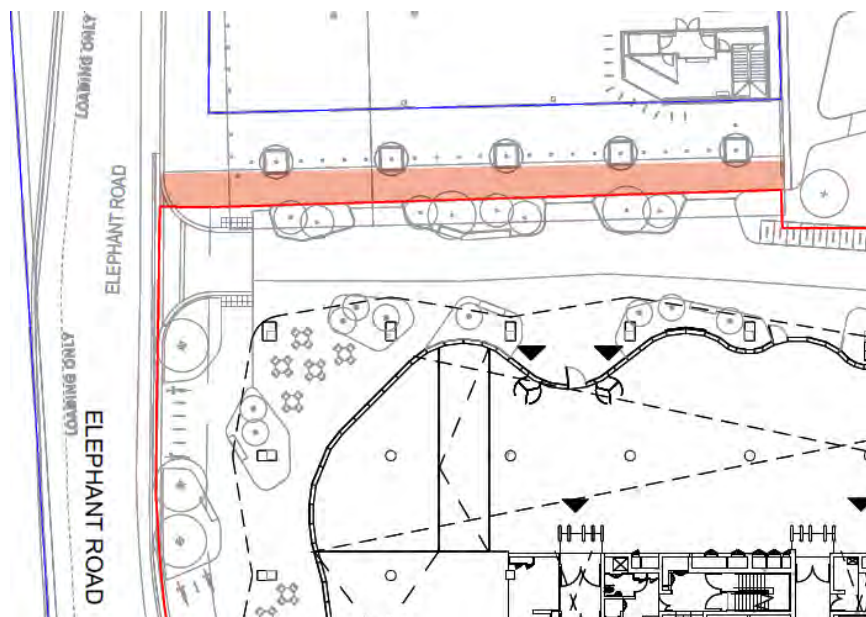
Fig.13 Inversion of inward to outward creases to create a terrace at level L09

Fig.14 Inversion of flat facade to create a terrace at level L11 on the west elevation

Fig.15 Inversion of flat facade to create a terrace at level L07 on the west elevation

Schematics of how the terraces have been added the northern and western façades

48. Along with the revised drawings, the applicant provided further information on the work carried out to develop the potential health hub in the scheme, and an indicative layout shown for a health hub access by patients from Walworth Road and a ground level pharmacy. A few small amendments were made to the landscaping around the building.
49. A change was made to the red line of the application site to remove a small area of public realm on the northern side of the site. No works were proposed in this area, and it overlaps with the ownership of Castle Square.



Orange area that has been removed from the red line application site

50. The applicant revised the affordable workspace offer to remove a third option that would have used the ground floor of Plot H11a on the eastern side of the masterplan as an off-site affordable workspace offer. The revised offer proposes affordable workspace be within Plot H1, and the submitted affordable workspace strategy document was updated accordingly.

Consultation responses from members of the public and local groups

51. The consultation and re-consultation undertaken and responses received to both stages are set out in Appendix 4, Appendix 5 and paragraph 441 onwards, with the responses summarised in more detail later in this report.
52. Over 430 objections were received to the first consultation on the proposal, including from the Walworth Society and 35% Campaign. Common topics of the objections were:
- to the principle of the office use as there is no demand or need for office space;
 - the plot should be used to provide more homes (especially affordable homes) instead;
 - the building is too large, tall and is unattractive;
 - it will harm neighbour amenity, loss of light, outlook and privacy, noise;
 - it will overshadow the park and harm ecology;
 - the additional traffic and public transport crowding from such a large building having so many staff and servicing movements;
 - environmental impacts such air pollution, creating wind tunnels;
 - strain on community facilities; and
 - the lack of community engagement by the applicant.
53. Two neutral comments were received to the first consultation.
54. Over 50 comments in support were made to the first consultation that;
- the proposal would add to the mix of uses in the masterplan, balance residential developments in the area, provide jobs, commercial space, a health hub, public atrium, activity and bring spending to shops and businesses in the area;
 - the height and design are appropriate for this location;
 - it provides public realm and landscaping; and
 - it is a sustainable location.
55. The GLA's Stage 1 response was broadly supportive of the proposal with matters of detail on technical matters raised. Comments from other consultees were considered in the amendments and revised documents submitted.
56. Re-consultation was undertaken on the amendments made in December 2021. This resulted in a further 39 objections that the revisions do not address the earlier points, repeating points made to the first consultation, and raising further

matters regarding the relationship with the masterplan (in terms of site-wide obligations for affordable housing, affordable retail, community space, how the site should be used for housing and affordable housing instead, the lack of information about a health hub and the impact on existing health facilities in the area, the lack of affordable workspace if a health hub comes forward, the design guidelines of the masterplan not being complied with). Two additional comments in support were received.

Planning history of the site, and adjoining or nearby sites

57. The 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 relevant decisions relating to this site, and other nearby sites, is provided in Appendix 3.
58. The planning history of the Elephant Park masterplan is of importance to the consideration of the current application, and will be referenced in the assessment below. Plot H1 was one of 12 development plots and the park pavilion within the approved outline planning permission to redevelop the Heygate Estate (ref. 12/AP/1092 – the OPP) with a residential-led scheme that also included retail, office, community, culture and leisure floorspace.
59. Since the 2013 permission was granted, the reserved matters for the other 11 plots, the park pavilion and the central park have been approved. The first three phases and park pavilion are occupied, and half of the fourth phase is complete. Two further plots are under construction. The applicant engaged in pre-application discussions on the Plot H1 proposal, and the council's pre-application advice letter has been published on the planning register.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

60. The main issues to be considered in respect of this application are:
 - Principle of the proposed development in terms of land uses (including affordable workspace and health)
 - Reconciliation and compliance with the outline planning permission
 - Environmental impact assessment
 - Design, including layout, building heights, fire safety
 - Heritage considerations
 - Landscaping, trees and urban greening
 - Ecology and biodiversity
 - 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
 - TV, radio and telecoms networks

- Aviation
- Planning obligations
- Mayoral and borough community infrastructure levy (CIL)
- Other matters
- Planning balance
- Consultation responses and community engagement
- Community impact, equalities assessment and human rights.

61. These matters are discussed in detail in the 'Assessment' section of this report.

Legal context

62. 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). The Elephant and Castle OAPF/SPD (2012) is a material consideration.

63. 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 local planning 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.

64. 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 and material considerations

65. The statutory development plan for the borough comprises the London Plan (2021) and Southwark Plan (2022). The National Planning Policy Framework (2021), the Elephant and Castle OAPF/SPD (2012), LPGs, SPDs and SPGs constitute material considerations but are not part of the statutory development plan. The Core Strategy (2011) and the saved Southwark Plan (2007) are no longer part of the development plan following the adoption of the Southwark Plan (2022). These superseded policies are no longer relevant to the determination of this application. A list of policies and material considerations which are relevant to this application is provided at Appendix 2. The policies which are particularly important to the consideration of this application are highlighted in the report.

66. The site is located within the:

- Central Activities Zone (CAZ)
- Elephant and Castle Opportunity Area
- Elephant and Castle major town centre
- Elephant and Castle Strategic Cultural Quarter.

67. 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. Small parts of the east and southern sides of the site are at risk of surface water flooding. It is also within the air quality management area. The site has a PTAL of 6b (excellent).
68. The site is within the wider setting consultation area of the LVMF view 23A.1 from the centre of the bridge over of the Serpentine to the Palace of Westminster (a World Heritage Site). It is not within a conservation area, does not contain any listed buildings, and it is approximately 180m north of the Walworth Road Conservation Area and the grade II listed Southwark municipal offices (Walworth Town Hall), library and clinic buildings on Walworth Road and nos. 140, 142, 150 and 152 Walworth Road.

ASSESSMENT

Principle of the proposed development in terms of land uses

Introduction and policy designations

69. The application proposes an office-led development, along with retail and the potential for a health use. All of these uses are within the Class E planning use class. Offices are Class E(g)(i), retail Class E(a) for shops, E(b) for restaurants and cafes, and E(c) for financial and professional services while health services are Class E(e).
70. 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, and ensuring the vitality of town centres. 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.
71. The London Plan's chapter "Good growth" includes GG2 "Making the best use of land" and GG5 "Growing a good economy" which are relevant to the proposal. To create successful sustainable mixed-use places that make the best use of land, objective GG2 states that those involved in planning and development must enable the development of brownfield land, particularly in Opportunity Areas and town centres, and prioritise sites which are well connected by public transport. It goes on to require proactively exploring the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. Objective GG5 states that to conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must, among other things, promote the strength and potential of the wider city region, seek to ensure that London's economy diversifies and plan for sufficient employment space in the right locations to support economic development and regeneration.
72. The site is within the Elephant and Castle Opportunity Area, one of 12 in central

London. The London Plan sets out an indicative capacity of 5,000 homes and 10,000 jobs for this Opportunity Area over the twenty years to 2041. London Plan policy SD1 “Opportunity Areas” in part B requires boroughs through their development plans and decisions to support development which creates employment opportunities and housing choice for Londoners, plan for and provide the necessary social and other infrastructure to sustain growth and create mixed and inclusive communities.

73. The site is within the Central Activities Zone (CAZ). The CAZ covers a number of central London boroughs and is London’s geographic, economic, and administrative core. The London Plan recognises the well-established long term demand for office space within the CAZ and strongly promotes office provision within this policy area, including policies SD4 “The Central Activities Zone” and SD5 “Offices, and other strategic function and residential development in the CAZ”. Policy SD4 at part B states “*The nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values*”. Policy SD5 at part C is relevant to sites such as Plot H1 within Elephant and Castle as it states:

“Offices and other CAZ functions are to be given greater weight relative to new residential development in all other areas of the CAZ except: 1) The Vauxhall, Nine Elms, Battersea and Elephant & Castle Opportunity Areas, where offices and other CAZ strategic functions are given equal weight relative to new residential; and 2) wholly residential streets or predominantly residential neighbourhoods...”

74. In the economy chapter of the London Plan, policy E1 supports new office provision, refurbishments and mixed-use development. Part C of policy E1 sets out that the unique agglomerations and dynamic clusters of world city businesses and other specialist functions of the central London office market, including the CAZ, should be developed and promoted. Over the 2016 – 2041 London Plan period, demand for office floorspace within the CAZ is expected to rise by 59%.
75. Plot H1 is also within a major town centre designation, where policies such as London Plan policy SD6 “Town centres and high streets” encourage town centre uses to promote the vitality and viability of town centres.
76. The Elephant and Castle SPD and OAPF (2012) shows the Plot H1 site to be within the Heygate Estate proposal site and character area, immediately next to the “central area” to the west. The strategies and guidance within the SPD support retail development to consolidate the major town centre, supports new business space designed flexibly to accommodate a range of unit sizes to help meet the needs of the local office market and SME businesses, and to enable businesses to remain the area as they grow. It states in SPD9 for community facilities that such services should be provided in accessible locations, and that the need for new community facilities will be kept under review, working with providers such as the NHS to identify appropriate sites if new facilities are needed.
77. The Southwark Plan (2022) in its strategic vision, ST1 “Southwark’s development

targets” and SP4 “A green and inclusive economy” aims to achieve targets for 58,000 new jobs in the borough between 2019 and 2036 (with a target distribution that includes 10,000 in the Elephant and Castle Opportunity Area), at least 460,000sqm of office floorspace between 2019 and 2036 (of which around 80% is expected to be delivered in the CAZ), and targets 10,000sqm net new retail floorspace in the Elephant and Castle major town centre. The Southwark Plan’s area vision AV.09 for Elephant and Castle states that development should “*support the area’s function as a major town centre for all Southwark residents and a central London location that attracts global business, research, teaching, shopping, flexible business spaces and cultural activities*”. The area vision notes that the area as part of the CAZ, Opportunity Area and major town centre has potential to provide significant amounts of new offices, shops, leisure and cultural uses and university facilities, and supports the provision of a new community health hub.

78. Southwark Plan policy P30 “Office and business development” requires such proposals within the CAZ, town centres and Opportunity Areas to retain or increase the amount of employment floorspace on the site, promotes the successful integration of homes and employment space and requires a marketing strategy for the proposed use to demonstrate how it will meet current market demand. It also states that conditions will be used to restrict changes of use within Class E. Policy P35 “Town and local centres” seeks to ensure main town centre uses are located in town centres, and that they are of a scale and nature appropriate to the role and catchment of the centre, and states that retail uses will be secured by conditions to restrict changes of use within Class E. The Southwark Plan continues to class Elephant and Castle as a major town centre.
79. The site is located within policy designations that support town centre uses such as offices and retail, and community use. The principle of each land use proposed in the application will be considered in turn in the sections below, followed by an assessment of the implications of this plot not providing further housing in the Elephant Park masterplan which was a point raised in many of the objections received.

Offices

80. As stated above, the site is located within the CAZ, where the London Plan promotes the provision of office space and identifies office use as an appropriate land use, suggesting an indicative capacity for 10,000 jobs in the Elephant and Castle Opportunity Area. Southwark Plan policy P30 requires developments in the CAZ to retain or increase the amount of employment floorspace on site. Therefore there is policy support for office use on the application site.
81. The site currently provides no permanent employment floorspace. The proposed development would provide at least 48,960sqm GEA of new office floorspace which meets the policy objectives of increasing employment floorspace within the CAZ, Elephant and Castle Opportunity Area and town centre. This is welcomed as a benefit of the scheme, and accords with London Plan objective GG5, policies SD4, SD5 and E1, and ST1, ST2 and P30 of the Southwark Plan. The GLA Stage 1 response states: “*the principle of a proposed office-led scheme in this locality is accepted in strategic planning terms. The provision of 49,565sqm of office floorspace would contribute to the demand for office*

floorspace recognised within the London Plan, as well as the success and development of the CAZ and the Elephant and Castle Opportunity Area and District Town Centre.” An office development on this site would contribute towards the borough-wide jobs targets of the Southwark Plan for 2019 to 2036 of 58,000 new jobs including 10,000 in the Elephant and Castle Opportunity Area. It would also contribute to the target of at least 460,000sqm of office floorspace across the borough over the same period, of which 80% is expected to be delivered in the CAZ.

82. In the revised scheme, the minimum provision of 48,960sqm GEA of office floorspace would have the potential to provide approximately 3,348 full time equivalent office jobs (based on a ratio of one job per 12sqm NIA in the minimum office scenario of 40,181sqm). This satisfies the aims of the London Plan in creating new jobs and high quality office space within the CAZ and the Opportunity Area. A maximum scenario of all the building being used for office floorspace (i.e. no health hub or retail uses) would have the potential to provide approximately 3,866 full time equivalent office jobs based on the same ratio. As the site has no current permanent employment use, all of these predicted office jobs are new to the application site.
83. A marketing strategy was provided with the application, as required by Southwark Plan policy P30 part 1) subsection 3). It considers typical working practices, what companies are looking for in their office space, and considers there to be a limited supply of premium office buildings in Elephant and Castle to attract major central London occupiers to the emerging area. The applicant considers Plot H1 to be an interesting place close to UAL and the health sector of Guys, St Thomas and Kings hospitals, next to the park with an architecturally exciting design and sustainable building with natural ventilation and materials. The proposal allows for a range of floor plates and for subdivisions of floors. As well as ready access to the adjacent park, staff would have access to the series of terraces on the eastern and south-western sides of the building, and the public ground floor lobby. While the applicant does not yet have any confirmed tenants, it anticipates the office would be occupied by an anchor tenant who will form the foundation of the broader “business ecosystem”, with smaller organisations expected to occupy the remaining floors, potentially in linked sectors.
84. The proposal intends to establish a new benchmark office building for Elephant and Castle, providing grade A space which is flexible, modern and adaptable. It can accommodate a diverse range of businesses, with the floorplans able to be subdivided readily to provide for smaller businesses or allow larger businesses to occupy multiple floors.
85. The policy requirements to provide skills and employment plans for the offices within the scheme at 10% of the estimated FTE employment on site would be secured through a planning obligation.
86. Many of the objections received referred to the pandemic removing or reducing the demand for office space in London, so that this proposed development is not needed. The GLA Stage 1 response noted:

“GLA Officers acknowledge that in the current context of the COVID-19 pandemic that the potential prospects of increased homeworking may generate

a shift in the future in the way people work in London and use office space. Notwithstanding this, it should also be recognised that at present there is not enough evidence to demonstrate that demand for office space has reduced so significantly and drastically, or permanently, as to be a material consideration to outweigh the normal application of the development plan and the associated planning policies.”

87. The development plan policies have not been amended or removed to respond to any long-term changes in working practices that may come out from the pandemic, and so remain as published and adopted for the consideration of this planning application. The local planning authority must determine the submitted application presented in this report, in accordance with the currently adopted local plan policies unless material considerations indicate otherwise.
88. The ES considers the likely effect of the office space upon business is expected to be direct, long-term, at the district level and to be of major beneficial significance. The office element of the proposal complies with policies in the London Plan and Southwark Plan, contributing to the nationally and internationally significant office functions of the CAZ, for a site that is also within an Opportunity Area and town centre.

Affordable workspace

89. London Plan policy E2 “Providing suitable business space” refers to incorporating a range of size of business units for micro, small and medium sized businesses, and policy E3 “Affordable workspace” sets out circumstances in which to secure affordable space for specific social, cultural or economic development purposes. Southwark Plan policy P31 “Affordable workspace” requires developments over 500sqm employment floorspace to deliver at least 10% of the employment floorspace as affordable workspace on site, at discount market rents, for at least 30 years, of a type and specification that meets current local demand, and to work with the council and businesses to identify such businesses to occupy the workspace. These affordable workspace policies were adopted after the OPP was granted, and there is no obligation in the OPP for the applicant to provide affordable workspace.
90. Policy P31 allows for public health use as an alternative to affordable workspace in exceptional circumstances, and this is the applicant’s preferred option in this application for reasons set out in later paragraphs. However, the planning obligation would need to allow for a scenario where the health hub cannot be delivered and so a conventional approach to 10% on site affordable workspace would be required, and to allow for a scenario where some affordable workspace is needed alongside a small health hub to get to a provision that is equivalent to 10% affordable workspace. Both scenarios involving affordable workspace would need to be defined in the planning obligation.
91. An affordable workspace strategy was provided as part of the submission and updated during the application. It reviews the council’s evidence base for the new Southwark Plan policy on affordable workspace. It considers the types of industries that would likely be interested in Elephant and Castle as those involved in: 1) creative activities, small production-based activities, and 2) financial and insurance services, legal and accounting, head office support

activities, computer programming and consultancy. As shown in the Southwark Plan, Walworth has demand from a mix of business types rather than one dominant affordable workspace demand. There are different types of businesses who could use affordable workspace at the site, either dedicated space or shared space within the proposal. These include grassroots organisations, start-up and scale-up businesses in the creative, services and technology sectors.

92. The application proposes two areas of affordable workspace in different parts of Plot H1 to suit these types of potential occupier:
- A co-working space (approximately 4,301sqm NIA) within the main office and mezzanine levels of the building. The co-working space is intended to create an industry cluster of businesses within the building across both the primary commercial occupiers and the affordable workspace occupiers. Suggested occupiers would be start-ups, scale-ups and freelancers. This space would have a 25% discount on market rents for 30 years, and be fitted out to shell and core with a contribution towards the category A fit out.
 - An incubator space (approximately 260sqm NIA) can be self-contained studios and maker spaces for creative industries on the ground floor located on Walworth Road with direct street access, and provide active frontages to the street with flexible accommodation targeting local creative businesses. This space would have a 25% discount on market rents for 30 years, and be fitted out to shell and core with a contribution towards the category A fit out. A range of uses is sought for these units, including office use. If affordable workspace were to occupy these units, then the other flexible uses of retail and health would not occur.
93. If both areas of suggested affordable workspace listed above are provided at the indicative areas shown, they total 4,561sqm NIA of affordable workspace. The proposal's active lobby and amenity spaces would allow access to shared facilities and interactions with other occupiers of the building, however these would not be counted towards the formal affordable workspace provision.
94. With the range of uses applied for to the lower levels of the building, there are different scenarios for how much of the building could be occupied as offices space (particularly at ground, mezzanine and first floor levels), therefore the 10% proportion of affordable workspace also has a range of floor area.
95. For example, one scenario is a total of 44,741sqm NIA of office space (consisting of the 40,181sqm in the upper floors, and the 4,560sqm of the mezzanine, first floor and the ground floor units on Walworth Road). This would require 4,471sqm NIA of affordable workspace to be provided within these parts of the building. The two areas set out above provide slightly more than this area at 4,561sqm, so the 10% minimum is achieved and exceeded by 90sqm.
96. The maximum office use scenario is that the active lobby is used as office space along with all other parts of the building to give a maximum NIA of 46,400sqm of office use, which would need to include an affordable workspace area of 4,640sqm. This would require the two areas to be used as affordable workspace plus 79sqm of the active lobby area to be set aside as affordable workspace.

97. Given this flexibility in the office area, the planning obligation would need to secure a minimum 10% provision on the applicant's final design and office use area, with details of the area and locations of the affordable workspace to be submitted for approval, and restrictions to ensure that the quantum of affordable workspace is always provided throughout the 30 years. It is considered appropriate to allow for a potential third arrangement where a payment in lieu is necessary if there is a small shortfall on achieving 10% on site, which may occur if both a health hub and some affordable workspace on site come forward that are a few square metres short. To ensure the affordable workspace remains as at least 10% of the actual office use on site (due to the range of uses sought), an obligation to prevent more office use being provided without a related increase in affordable workspace would be included.
98. The operational model for the affordable workspace has not been finalised by the applicant which would inform the rental model to be used. The applicant aims to establish a blended or tiered approach to the affordable workspace product to allow it to respond to specific needs and requirements of potential occupiers, supporting start-ups through to scale-ups. The criteria for eligibility would need to be considered and defined, the fit out specification, and the minimum 25% discount on market rent set for 30 years. These would need to be secured through the planning obligation along with the ongoing reporting.
99. The ES considers the impact of the affordable workspace provision upon businesses in a maximum scenario to be direct, long-term, at the district level and of major beneficial significance. Securing a minimum of 10% affordable workspace on-site complies with Southwark Plan policy P31 and London Plan policy E3, subject to the further details to be secured for approval in the planning agreement.

Health

100. This application proposes a health hub use be one of the permitted uses of parts of this building, leaving the applicant flexibility on whether to progress the health hub or office use. Health is one of the flexible uses applied for the Walworth Road ground floor units and the alternative to office use of the mezzanine and first floor. As will be set out in this section, the health hub use is to be the priority option ahead of any affordable workspace use, and this priority would be set out in the planning obligation. The option of either a health hub or affordable workspace use for part of the plot floorspace (or a combination of the two to equate to a 10% provision), means the weight that can be given to each use and the associated benefits needs to be measured accordingly, and not double counted.
101. Although the exact range of services that would be provided would be developed by the public health provider, the health hub is intended to bring together partners in primary care, secondary care, community services, mental health trusts, voluntary sector organisations, borough services and stakeholders, in a multi-disciplinary facility, similar to that provided by the Tessa Jowell Health Centre in Dulwich. If this planning application is approved, the South East London CCG has advised that there would be a formal public consultation process to develop the right mix of services. The applicant

proposes a health hub to be provided as an alternative to affordable workspace, and the first option for the space to be let to the NHS or equivalent operator. If the health hub does not come forward then the affordable workspace would progress instead.

102. In terms of a planning policy background, the Elephant and Castle SPD and OAPF (2012) states in SPD9 that the need for new community facilities will be kept under review, working with providers such as the NHS to identify appropriate sites if new facilities are needed, and that community facilities should be provided in accessible locations. Since the OAPF was written, while sites within Elephant and Castle have been considered over the years (with input from the council's regeneration team), such as LSBU and the Shopping Centre, none have progressed beyond a feasibility stage and no planning application for a health centre has been approved.
103. The London Plan policy S2 "Health and social care facilities" in part B supports the provision of high-quality new and enhanced social care facilities to meet identified need, and where they are easily accessible by public transport, cycling and walking. Southwark Plan policy P47 "Community uses" states that new community facilities will be permitted where they are accessible for all members of the community. The AV.09 Elephant and Castle Area Vision states that development should "*support the provision of a new community health hub*". The Southwark Plan has four site allocations in the area that state in each site requirement section that "*Redevelopment of the site may: Provide a new community health hub (E(e))*" and so allows for this use to be included, but it is not a policy necessity. These allocations are: NSP45 Bakerloo Line Sidings and 7 St George's Circus; NSP46 63-85 Newington Causeway; NSP47 Salvation Army Headquarters on Newington Causeway and; NSP48 Elephant and Castle Shopping Centre and LCC. Only the Shopping Centre has permission (which did not include a health hub) and the other three sites do not have current planning applications for their redevelopment. A current EIA scoping opinion request for the Salvation Army site does not include health use within the proposal.
104. A health impact assessment was provided with the application which considers the potential impact of the proposal on the health and wellbeing of the population. It found no negative health impacts, and concludes there are neutral and positive impacts. If the health hub is provided in the building, it would help relieve pressure on primary care and outpatient service and could provide a pharmacy. The public realm around the plot and improved routes, including seating and planting, the focus on active travel and public transport, and employment opportunities would be further aspects that help to bring health improvements. The ES concluded that if a health hub were provided its impact would be of major beneficial significance upon residents. Using a rate of 165sqm GIA of health floorspace per job, a health hub is estimated to employ approximately 42 FTE jobs.
105. This site is within an accessible location in the town centre, close to the stations and bus services, and easily accessible by cycling and walking. The building and its surrounding public realm would allow level access, and lift access to the upper floors. The plot fronts the main Walworth Road to give it a visible location on this main road, as well as facing the train station, small roads and the park.

The principle of a health hub use on this site is supported by adopted policy, and the Southwark Plan area vision AV.09 and policy P47.

106. A health hub is proposed in lieu of affordable workspace, or as a combination of both to get to a provision that is equivalent to 10% affordable workspace provision. If a health hub does not progress (for agreed reasons and with the engagement of stakeholders) the scheme would provide affordable workspace. Southwark Plan policy P31 "Affordable workspace" part 5 states that: "*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...*" The health hub would be an NHS facility, not a private health clinic, and would be secured as such in a planning obligation; therefore the proposal would provide public health services as mentioned in part 5 of policy P31.
107. The applicant and council's regeneration team have engaged with the NHS and Guy's and St Thomas Foundation Trust since October 2020 about incorporating a health hub into Plot H1. A letter in support was received from NHS South East London Clinical Commissioning Group (CCG) to the proposal. The CCG commented that Covid has highlighted health inequalities across south-east London; as the regeneration and associated population growth is predominantly in the north half of the borough and associated neighbourhoods, these are the CCG's areas of greatest need. The CCG stated that it looks forward to working collaboratively with primary, secondary and other health care providers to further develop primary care commissioning and out of hospital health hubs in Elephant and Castle, to provide access to appropriate services in the right mix of health, social care and voluntary services to address health inequalities.
108. The two letters received from Guy's and St Thomas' NHS Foundation Trust are in support and state the Trust has strong interest in occupying the proposed health hub. The Trust comments "*Elephant and Castle is a proven required location for further healthcare floorspace*", continuing that "*the need for and delivery of a Health Hub is absolute and this is supported by the wider CCG*" and that the "*provision of floorspace in this development is an important step in ensuring the future of healthcare service delivery in the area.*" The Trust asks for the health floorspace to be secured in a planning obligation to safeguard the space for the use of a healthcare provider, and for it to be offered to the Trust or another appropriate NHS provider in the first instance. It supports car-free development, cycle parking and ask that transport impacts take account of emergency vehicles. The Trust ask to be consulted during the decision of the NHS provider occupier, and that it be agreed by the council, applicant and the Trust; this can be secured as part of a planning obligation.
109. An initial scope has been outlined for the types of accommodation a health hub may require including a pharmacy, GP cluster, diagnostic facilities, outpatients, clinical support and staff facilities, totalling 3,965sqm, however this is likely to change as detailed discussions progress on the services a health hub would offer. A potential layout within Plot H1 has been provided showing a patient reception on Walworth Road next to a pharmacy, with dedicated lift access up to the first floor where different departments would have consultation rooms,

waiting areas for the outpatient department, GP cluster, diagnostics, mental health, children's services and long term conditions. In the indicative layout staff would have access to mezzanine areas for a staff room and facilities, clinical support offices and meeting rooms. Initial information was provided about the transport impacts of a health hub and its operational requirements, such as trip generation, cycle parking, the potential for 10 staff parking spaces to be provided in Plot H2's basement car parking, the use of drop off on Deacon Street to be used for patient transport vehicles (or a space within the servicing yard) and blue badge parking. Again such details are indicative and require further discussions with the NHS, before the proposed details can be submitted to the council on the size, layout and operations of the health hub.

110. The applicant suggests that a health hub use would have the same if not greater cost to the scheme than the provision of the equivalent affordable workspace area, because a health hub for a public health body would command a lower rent. As a proposed fully commercial scheme, the local planning authority is not able to require the detailed financial information be provided to test the viability of the proposal to confirm this in the planning application. The applicant proposes the health hub be in place of the 10% affordable workspace provision, therefore officers have considered whether the size of the health and affordable workspace areas are equivalent:

- In a minimum office scenario, the office area on levels 2 and higher of the building is 40,181sqm NIA. Taking this to represent the 90% office area for calculating affordable workspace, a 10% proportion as affordable workspace would be 4,465sqm NIA. The maximum size of the proposed health hub area if it uses all the ground, mezzanine and first floors spaces proposed for this use, totals 4,560sqm NIA and so exceeds the 10% proportion. However, it is noted that the NIA given is likely to be a slight over-estimate as separate lifts and stairs for the health hub have not been shown on the drawings, which means exceeding the 10% area is a sensible approach.
- With the flexible uses sought across the ground floor there are several scenarios with different areas of office, health or retail uses potentially implemented. To work through a maximum office scenario where all the upper floors and all of the ground floor are used as offices (totalling 42,099sqm NIA and representing 90% general office area for the affordable workspace calculation), a health hub at only mezzanine and first floor levels of 4,301sqm NIA would not achieve the equivalent area of 10% affordable workspace of 4,677sqm NIA. This scenario is unlikely to occur as the active lobby and ground floor units would have to be completely given over to office use, with no retail and no ground floor health use.

111. The exact size of the health hub is unknown at this stage as it requires further discussions with the CCG and other stakeholders, but the areas of health use applied for allow reasonable scenarios of a health hub to be accommodated in the building alongside office and retail uses. Along with the flexible uses applied for allowing the health, office and retail sizes to adapt to accommodate either the health hub or affordable workspace, it is not possible to fix precise floor areas for each use at this planning application stage, nor can the applicant confirm the rent level for a health hub. Because of this flexibility in the precise areas of uses, a

planning obligation to secure the submission and approval of further details at a later stage is necessary. The planning obligation would need to require further details such as the location, areas and detailed layout of a health hub and rent levels to ensure it represents the equivalent value of a 10% affordable workspace provision.

112. A copy of the February 2022 memorandum of understanding (MOU) between the applicant, the council and the CCG was provided by the applicant. While not a legal binding document, the MOU provides the framework for on-going co-operation and collaboration between the parties in developing and delivering the Plot H1 health hub, and agreeing heads of terms. It is the most advanced stage that can be reached between the parties before a planning permission is granted. It sets out how a lease for 30 years is proposed to be granted to a nominated NHS organisation. It states that the NHS is looking for a suitable space to develop a support hub (in effect a health centre for GP and community health nursing services) to serve the population at Elephant and Castle and the existing people currently served by the Princess Street and Manor Place GP Surgeries. The MOU includes the test fit study diagrams that would be further refined by the parties as the scope of services to be provided informs the design development.
113. While work on the detailing of a health hub would continue in line with the MOU after a positive decision is made on this application, it is considered sensible for the planning obligation to include wording to address a scenario where a health hub comes forward at a smaller scale, and therefore not equivalent to 10% affordable workspace offer. In that event, a combination of a health hub on the site and some affordable workspace would be necessary to achieve the 10% policy requirement between the two uses, and potentially a payment in lieu if there is a shortfall that cannot be accommodated on site.
114. Objections to the health hub were made in the public consultation responses that a health hub should not be at the expense of housing, or affordable workspace, that the OPP masterplan needs to provide its own health facilities, and that further information is needed on how much health contribution money has been paid by the applicant and what has been spent on. Objection was also made to lack of information on the health hub, with concern that the MOU suggests it is likely to replace Princess Street and Manor Place surgeries which is a huge change, and no detail on how this interacts with/reshapes local health provision and statutory community consultation needed before the planning decision is made.
115. The following observations by officers are made in response to these points. The OPP planning obligation required either the staged payment of financial contributions to the council (based upon £603.43 (indexed) per residential unit, and so far approximately £1.1m has been paid to the council) or for the applicant to provide an on-site health facility of up to 500sqm as part of the OPP. The applicant has paid the financial contributions and not provided a health facility as part of the OPP. The local planning authority will determine where to spend those monies on health facilities within the Opportunity Area, and indeed it may be used to fund part of this proposed health hub. The need for a public health facility in this area, which has yet to be met by another site, is considered to be an exceptional circumstance for allowing the delivery of health facilities in lieu of affordable workspace. The proposed health hub is much larger than the health

facility option allowed for in the OPP. The consultation on and determination of this planning application does not remove any requirements on health providers to carry out their own consultation on changes to health provision in the area, nor make any assumptions by the local planning authority of what might happen to existing GP surgeries in the area.

116. The long-established local need for a health hub, to be operated by the NHS or an identified health trust (approved by the council) is considered to be an exceptional circumstance to allow such an alternative to affordable workspace to be appropriate in this case. The section 106 agreement would secure a health hub as the first option for the space within the plot, and a process for agreeing with the council whether a health hub is to be progressed or if, for good and agreed reasons, it is not. The section 106 agreement would secure it as affordable workspace to come forward if the health hub does not, and allow for a combination of both uses in the event a smaller health hub is provided. It would require further details of the health hub floor area, its layout, level of fit out and rent (in order to demonstrate the provision is equivalent to a 10% affordable workspace provision), for the healthcare occupier to be agreed by the council as well as the CCG and Guy's and St Thomas's NHS Foundation Trust, and further information on transport and operational matters. It would also address the later requirement of policy P31 part 5 that if the alternative use is no longer required in the future, the space should be made available for affordable workspace.

Retail, services, restaurants and the active lobby

117. The site is within the Elephant and Castle town centre, where retail uses as shops, professional services and restaurants are directly towards and supported by policies, such as Southwark Plan policy P35 "Town and local centres". The retail floorspace of the proposal would contribute towards the Southwark Plan's target of 10,000sqm of net new retail floorspace in the Elephant and Castle major town centre. The retail elements in the two ranges of uses proposed in the lobby area and in the units fronting Walworth Road are appropriate locations for such uses, continuing the retail uses along Walworth Road, Elephant Road, Sayer Street, and turning into Deacon Street.
118. Other uses are proposed in addition to retail for the ground floor units. The Walworth Road units are proposed to have office or health uses too. Office use would also be appropriate to front onto Walworth Road, and health is acceptable in principle; it may relate to the health hub on the floors above, for example as a pharmacy or reception area. In order to maintain an active frontage to the ground floor frontages, and to maintain the appearance of the upper levels of the building a condition is recommended to prevent windows from being obscured without the council's approval.
119. The active lobby is proposed to have office, retail, professional services and food and drink uses, each of which are acceptable uses in principle for the reasons set out above. The office use is proposed as part of the space may be provide affordable workspace, or further office space for the floors above. The applicant intends this part of the ground floor (shown in pink in earlier diagrams) to be a combination of restaurants, bars, coffee shops with curated events and exhibitions for the community, and providing spaces to work, relax and meet. The detail of the division of these uses into areas/units around the edge and the

extent of the publicly accessible lobby would need to be provided at a later stage, and the public access each day, free to use Wi-Fi, toilets and seating to be secured in a planning obligation. The applicant proposes a minimum area of 500sqm be publicly available in the active lobby, approximately 30% of the proposed flexible area shown in pink, which would be secured in an obligation; therefore when assessing the public benefit from this element of the proposal it needs to be proportionate to this minimum provision.

120. If the Walworth Road units were used as for food and drink retail, approximately 15 FTE jobs are estimated, and retail uses in the lobby would also provide jobs. The policy requirement is to require the provision of skills and employment plans for the retail uses within the scheme (at 20% of the estimated FTE employment on site), which would be secured through a planning obligation.

Non-delivery of housing

121. Many of the objections received to the application referred to the loss of approved housing in the OPP for this plot, that this “spare” plot of the masterplan is suitable for a housing development to address the borough’s housing need, and that with an updated viability assessment to provide further affordable housing from the Heygate Estate redevelopment, as a public sector owned site. The objections refer to London Plan policy H1 “Increasing housing supply” which seeks to optimise the potential for housing delivery on all suitable and available brownfield sites (especially those with PTALs of 3 to 6), how far more social rented units on the Heygate Estate were demolished than are being provided in Elephant Park, and how a 25% affordable housing provision is below the minimum 35% required now. However, this is a standalone application, not a reserved matters application under the OPP. As such it must be assessed and determined on its own merits.
122. The OPP expected Plot H1 to be residential on its upper floors, with the options to include office, community and leisure uses as well. The site-wide minimum residential floor area approved in the OPP has been achieved by the other plots of the masterplan, as set out in the later assessment topic section. The site-wide maximum residential floor area limit of the OPP has almost been reached, so that Plot H1 could not be developed pursuant to the OPP with a meaningful number of residential units. The other plots within the masterplan have delivered the residential development approved by the OPP, including the 25% affordable housing obligation, without needing Plot H1 to include further residential floorspace. The applicant has a choice of the policy compliant uses to propose within the redevelopment of this plot in a standalone planning application. There is no viability review in the OPP to allow the local planning authority to assess the impact of the proposed commercial scheme on the masterplan’s finances and whether further affordable housing could be provided. This application is not an opportunity to revisit the terms of the OPP.
123. The London Plan’s “Good growth” objectives refer to both delivering the homes Londoner’s need (GG4) and growing a good economy (GG5), and with detailed policy chapters on both housing and economy. Similarly the Southwark Plan has strategic targets and strategic policies relating to the delivery of homes and jobs (including green jobs). As an almost-vacant brownfield site, in an area of high public transport accessibility and with the policy designations of the CAZ,

Opportunity Area and town centre, housing and employment development are both appropriate in principle.

124. London Plan policy SD5 “Offices, other strategic functions and residential development in the CZ” in part C makes it clear that within the Elephant and Castle Opportunity Area, offices and other CAZ strategic functions are given equal weight relative to new residential development. Southwark Plan policy P30 on office and business development in part 1) subsection 2) promotes the successful integration of homes and employment space in physical layout and servicing in areas that will accommodate mixed use development.
125. In this full planning application, the applicant chose to submit a completely commercial scheme with no residential use, and it is to be assessed on its own merits against the current development plan policies and material considerations. A viability assessment is not required by development plan policies for a purely commercial scheme such as this, so none has been provided with this application. This plot remains part of the wider Elephant Park masterplan area (with its 2,689 homes) and would be viewed as such when walking around the masterplan with its ground floor commercial units of retail, leisure and community uses, significant quantum of residential properties on the upper levels, central park and public realm. Being at one end of the masterplan site, the plot is located near to the commercial uses on Walworth Road and Elephant Road, the temporary shop units on Castle Square, the shops, leisure, residential and student housing to the north, and Shopping Centre redevelopment under construction on the other side of the railway lines which sit outside the masterplan. Officers are of the view that the intention to have mixed use neighbourhoods would be achieved without needing this plot to contain both employment and residential uses.
126. The applicant cannot be required to design and submit a full planning application for a residential scheme for this plot to continue the residential-led nature of the rest of the masterplan. London Plan policy SD5 gives equal weight to offices and housing in this part of the CAZ. The Southwark Plan housing delivery does not rely on this plot being developed for housing. The GLA Stage 1 response states *“The proposals involve no demolition of existing homes, and the housing and affordable housing obligations of the estate regeneration masterplan have already been achieved within other plots. GLA officers accept the principle of optimising this site through the intensification of land uses proposed via this “drop-in” planning application. The development, which would provide jobs, services and facilities in a highly accessible location, as well as the provision of public realm, aligns with Objective GG5 of the London Plan.”* The GLA therefore did not raise objection to this plot being developed for a non-residential scheme.
127. The lack of proposed homes and affordable housing, within this office-led proposal is not considered to be a reason for refusal of the scheme as the proposed uses comply with policies that support employment use, and in the case of London Plan policy SD5 give equal weighting to these land uses within the Elephant and Castle Opportunity Area. The proposal for this plot does not compromise the delivery of the housing nor other elements approved on the other plots of the Elephant Park masterplan.

Conclusion on land uses

128. Each of the proposed land uses are appropriate in policy terms for this site within the CAZ, Elephant and Castle Opportunity Area and town centre. Given the wide range of uses that are within Class E, it is appropriate to limit the permission to the specific uses applied for and assessed in the application and its ES, and to prevent changes of use away from those defined uses.
129. There is policy support for office-led development in Elephant and Castle given its location within the CAZ, Opportunity Area and town centre, with London Plan policy SD5 giving equal weight to office development as residential development, and the Southwark Plan seeking to delivery 10,000 jobs within the Opportunity Area. A health hub would address one part of the Southwark Plan's area vision for Elephant and Castle, and has support from the NHS South East London Clinical Commissioning Group and Guy's and St Thomas' NHS Foundation Trust. The GLA Stage 1 response considered the proposed land uses to strategically align with the town centre, Opportunity Area and CAZ designations of the site, and supported the proposal. In this instance a health hub run by a public health body is an appropriate alternative to affordable workspace provision. If a health hub does not come forward, the scheme would address the 10% affordable workspace policy requirement with on-site provision.
130. While the plot would also be appropriate for residential development in principle, it is not what the current application proposes; the lack of residential use in the proposal is not a reason for refusal of this application. The application for Plot H1 must be determined as submitted in accordance with current policy. As outlined above, the principle of a commercial development on this site complies with the local plan.
131. Planning obligations are necessary to secure the health hub or affordable workspace (or a combination of the two) and further details, construction phase jobs and training, local procurement, end use jobs and training to ensure policy compliance.

Reconciliation and compliance with the outline planning permission

132. Although this application is not a reserved matters application (RMA) pursuant to the outline planning permission (OPP) for Elephant Park, it includes a reconciliation statement which is required by a condition of the OPP. Condition 17 of the OPP requires evidence to be submitted with each RMA demonstrating how it complies with the site-wide development controls set at the outline stage (i.e. the approved parameter plans, Development Specification and Design Strategy Document), as well site-wide strategies and plot specific strategies that have since been approved pursuant to obligations contained within the 2013 section 106 agreement. Since the OPP was granted in 2013, a series of non-material amendments has been agreed, usually to make small changes for an individual plot however some site-wide changes to the OPP were agreed which revised some of the site-wide controls.
133. A standalone full planning application was made because the current proposal for Plot H1 does not fit within the scope of the OPP, in terms of the quantum of

floorspace for the proposed uses and the scale of the building being different to the approved OPP parameters. The current submission is therefore not subject to the same controls as for a RMA proposal, and is to be determined against current development plan and material considerations. If permission is granted for this application and the applicant implements it, an obligation in a planning agreement would mean the new permission would supersede the OPP for this part of the Elephant Park masterplan site.

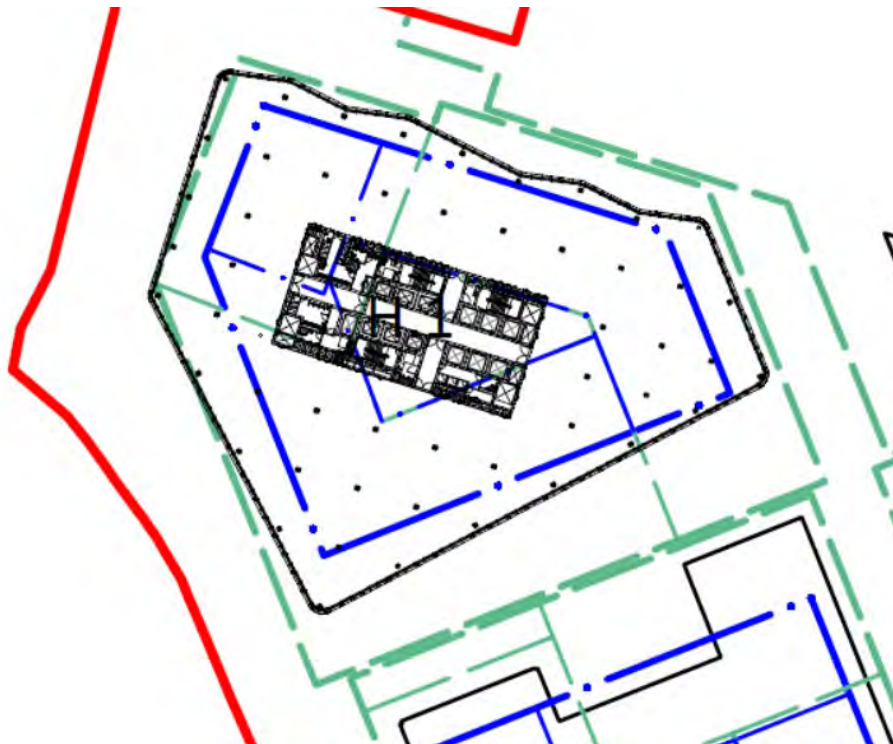
134. This topic section is included nonetheless to show how the proposal is compatible with the rest of the Elephant Park masterplan, and to show how the total area of public realm of the OPP, and the remaining minimum floorspaces of the masterplan would be achieved by this proposed final plot design. The reconciliation statement (as summarised below) also includes comparisons between the OPP controls for Plot H1, and explains how mitigation measures secured in the OPP would be delivered by the application for this plot. It is intended that Plot H1 would form construction phase MP5b of the masterplan. As Plot H1 is the final plot in the Elephant Park masterplan, the complete figures for the whole masterplan are available and compiled at the time this application was submitted, by totalling the approved construction phases and plots, plus the current Plot H1 proposal.
135. The OPP's approved parameter plans and Development Specification for Plot H1 set a minimum floor area of 22,491sqm GEA, and maximum of 36,100sqm GEA. The proposed building has a total floor area of 63,996sqm GEA, falling outside the scope and terms of the OPP Development Specification maximum area for this plot (by 27,896sqm GEA). It is approximately three times the minimum floor area set by the OPP Development Specification, and almost twice the maximum floor area. This is one reason the proposal cannot be a RMA pursuant to the OPP. The fact that the current application does not fit within the OPP envelope does not in itself make it an inappropriate development.
136. The OPP envisaged Plot H1 to be a mixed use development of two blocks and a tower arranged around a raised podium, with a principal land use of residential (Class C3) and retail use (Classes A1, A2, A3, A4, A5) at lower levels, and stated there is potential for business (Class B1) and community and leisure (Classes D1 and D2) uses at upper levels. The approved uses at ground, mezzanine and basement levels were Classes A1-A5, B1, C3, D1 and D2, and Classes C3, B1, D1 and D2 for the upper levels. The current proposal scheme is one building as an office-led (former Class B1, now Class Eg(i)) development, with no residential, and allows for health (former Class D1, now Ee) and retail uses (former Classes A1-A3, now Ea, Eb and Ec) in the uses applied for the lower parts of the building. These uses and their compliance with current development plan policies, and the absence of housing in the proposal were discussed in the earlier assessment topic.
137. In terms of the physical form of the plot's redevelopment, the OPP set minimum and maximum parameters for the plot extents at different levels. To look at the ground floor, the proposed footprint shown in black in the diagram below exceeds the OPP minimum parameter plot extent shown by the blue line. It sits mostly within the OPP maximum parameter plot extent (shown by the dashed green line) with three exceptions of the north-west columns on the Elephant Road frontage, the western corner and south-western side along Walworth Road, and

a small exceedance on the eastern side of the building.



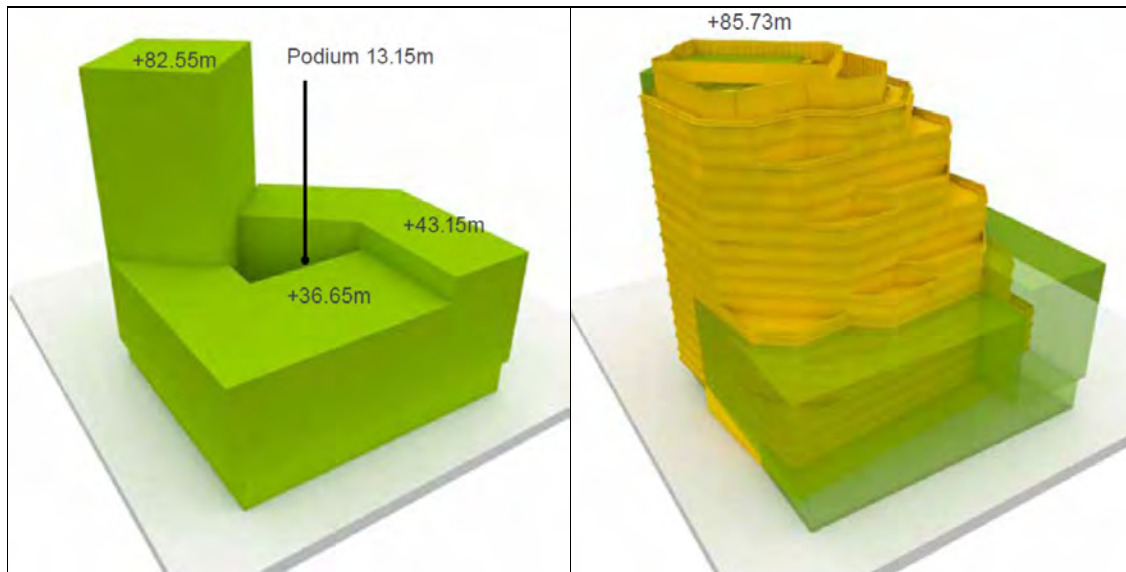
Ground level footprint comparison showing the proposal in black

138. A comparison of the proposal against the OPP maximum and minimum plot extents for the upper levels was provided. The extent of the submitted building is shown on the diagram below in black, the minimum OPP plot extent in blue, and the OPP maximum plot extent in green. The proposal exceeds the OPP minimum extent in all areas. It sits within the OPP maximum plot extent on three sides, but exceeds the OPP maximum extent on the north-western side and at the western corner.



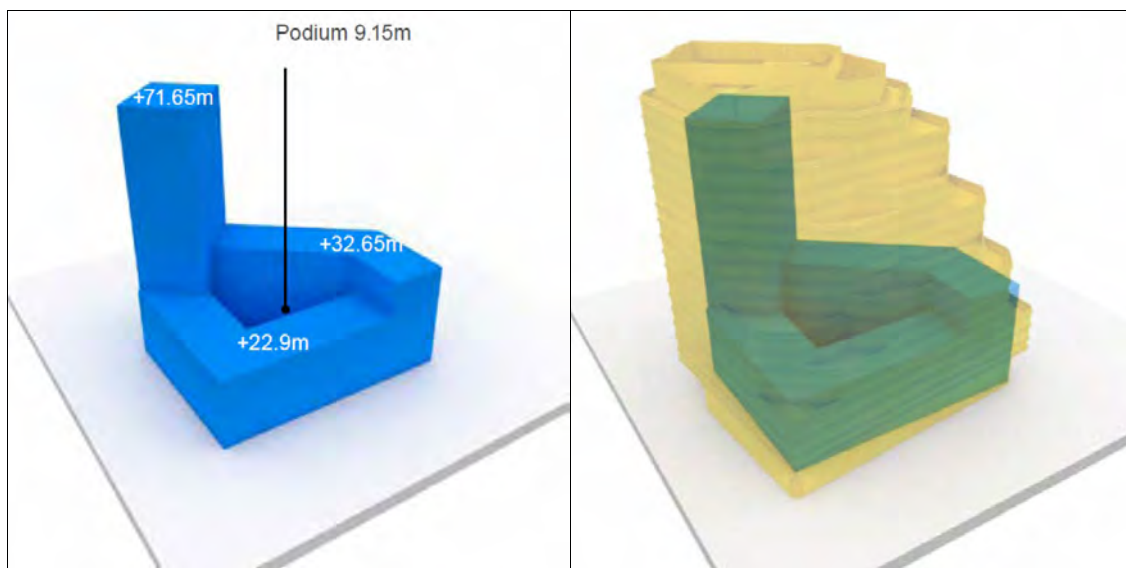
Upper levels footprint comparison

139. The proposal therefore exceeds the OPP's footprint parameters and it also exceeds the OPP's massing parameters. The plot heights of the OPP were set with minimum heights to three different parts of the plot (of 22.9m and 32.65m for the two blocks and 71.65m for a tower) and maximum heights (of 36.65m and 43.15m for the two blocks and 82.55m for a tower) and the central podium. The current scheme has a maximum height of 85.73m, to be 3.18m taller than the approved OPP maximum height of the tower, and up to 45.9m taller than the OPP maximum block height. The majority of the massing exceeds the OPP maximum parameters.
140. The two visuals below compare the envelope of the OPP maximum parameters (in green) with the submitted massing (in yellow).



Visuals to compare the OPP maximum parameters envelope (left, in green) with the submitted massing in yellow overlaid on the right.

141. All but one very small corner of the proposal exceeds the OPP minimum parameters scheme, as shown by the two visuals below. The minimum tower height is exceeded by 14.08m, and the minimum block height by 62.83m.



Visuals to compare the OPP minimum parameters envelope (left in blue) with the submitted massing in yellow overlaid on the right.

submitted massing in yellow overlaid on the right.

142. The OPP established the acceptability of certain uses for this plot and there is policy support for the current proposal. As has been shown by the images above, the current proposal for Plot H1 cannot be proposed as a reserved matter pursuant to the OPP, and so its design and impacts have been considered and explained in the various topic sections of this assessment.
143. The reconciliation statement takes account of the cumulative delivery of the Plot H1 proposal together with designs of the previously approved masterplan phases MP1, MP2, MP3, MP4, MP5a and park pavilion as they were known at the time Plot H1 was submitted. Condition 17 of the OPP identifies the principal areas of reconciliation where information is required at each reserved matters stage as set out below, each of which will be summarised:
- 1) number and mix of residential units;
 - 2) affordable housing quantum, location and mix;
 - 3) land use floor space and distribution;
 - 4) open space provision;
 - 5) car parking, motorcycle parking, and cycle parking;
 - 6) transport/highway works provision; and
 - 7) utilities.
144. While this application is not a RMA, the submitted reconciliation statement addresses these requirements and shows how Plot H1 would contribute to the site-wide requirements of the rest of the Elephant Park masterplan and where it cannot be reconciled.
- 1) Number and mix of residential units
145. No residential use is proposed in this application. The reserved matters approval for Plot H7 was the final residential plot of the masterplan to give a total of 2,689 homes across the Elephant Park OPP masterplan. An objection to Plot H1 was received questioning the total number of units in Elephant Park, which is arrived at by adding up the RMAs approved within the masterplan. The cumulative total across all plots remains at 252,414sqm GEA of residential floorspace, out of the OPP maximum residential area of 254,400sqm GEA (leaving 1,986sqm of remaining residential floorspace in the OPP).
- 2) Affordable housing
146. No residential use is proposed in this application, which means the affordable housing provision requirement across the Elephant Park masterplan does not change from the cumulative position achieved with Plot H7 as the final residential plot. The provision of the 25% affordable housing secured in the 2013 section 106 agreement was staged into cumulative delivery milestones of 400, 800, 1,200, 1,600, 2,000 units and on completion of the masterplan. The site wide total habitable rooms in affordable units achieves and exceeds the 25% affordable housing provision across the Elephant Park development (when applying the "discount" of 1 habitable room for each affordable wheelchair unit allowed for within the section 106 agreement). The tenure split of the affordable housing units across Elephant Park would not change with the Plot H1 proposal, remaining at 50.5% rented and 49.5% shared ownership, and the percentage of

3-bedroom units would not change. An objection was received about the rent and service charge levels of the social rent units across Elephant Park in respect of the built out units; this is being investigated by the enforcement team separately to this planning application, and is not a relevant material consideration for this application.

3) Land use floor space

147. The OPP set minimum and maximum floor areas for different uses. With all other plots having had their reserved matters approved, the cumulative totals of the approved floorspace areas for the different uses can be calculated, however many of the commercial areas in other plots were approved with a range of uses so assumptions were made of which of the approved uses will be implemented on plots that were not occupied at the time the reconciliation statement was written. The table below made assumptions at the time the Plot H1 application was submitted; it shows the cumulative totals of all other plots in the masterplan (i.e. excluding Plot H1) as of May 2021, whether the minimum quantum for each use has been achieved, and how much floorspace remains up to the maximum quantum caps. It is noted that since May 2021 the applicant has for example signed up further tenants in Plot H4 (with more retail and less D2 leisure), Plot H11a (no longer an office use, but a leisure use) and taking on a unit in the Energy Centre (to include a community use) so some of the assumptions that resulted in the figures reported below are likely to be out of date. However for the purpose of the determination of this Plot H1 application it shows how the minimum areas of the OPP masterplan will be achieved across the rest of the masterplan, with the exception of the office area.
148. The OPP minimum floor area for residential, retail, community, leisure and sui generis will be achieved once the plots are constructed – without Plot H1. The only use where the OPP minimum floor area has not yet been achieved is office use. The site-wide 10% affordable retail provision required by the section 106 agreement would remain and Lendlease is on track to deliver this once the last two plots are constructed.

Use Class	OPP minimum floor area (sqm GEA)	OPP maximum floor area (sqm GEA)	Cumulative (sqm GEA) without Plot H1	Has the OPP minimum area been achieved ?	Remaining floor area from the maximum (sqm GEA)
C3 residential	160,579	254,400	252,414	Yes	1,986
A1-A5 retail	8,000	16,750	8,099	Yes	8,651
B1 business	3,000	5,000	816	No	4,184
D1 community	1,500	5,000	1,728	Yes	3,272
D2 leisure	1,500	5,000	1,679	Yes	3,321
Sui generis	500	925	787	Yes	138

(energy centre)					
Sub total for uses	175,079	287,075	265,523	Yes	21,552
Parking, servicing, plant and storage	17,000	43,666	17,759	Yes	25,907
Total	192,079	330,741	283,282	Yes	47,459

The masterplan cumulative floor areas as of May 2021 without Plot H1

149. The remaining floor areas on the right hand column of the table below could have been used to bring forward a development on Plot H1 if Lendlease had progressed a RMA. Lendlease has chosen not to progress Plot H1 as a RMA that fits within the OPP floorspace caps in order to optimise the redevelopment of this plot. The quantum of office floorspace proposed means that the one outstanding OPP minimum use area not yet achieved by the masterplan for Class B1 office space would be achieved with the office-led Plot H1 in place.

Use Class	OPP minimum floor area (sqm GEA)	OPP maximum floor area (sqm GEA)	Cumulative (sqm GEA) with Plot H1	Has the OPP minimum area been achieved ?	Remaining floor area from the maximum (sqm GEA)
C3 residential	160,579	254,400	252,414	Yes	1,986
A1-A5 retail	8,000	16,750	9,803	Yes	6,947
B1 business	3,000	5,000	56,849	Yes	0 Exceeded maximum by 51,849
D1 community	1,500	5,000	1,728	Yes	3,272
D2 leisure	1,500	5,000	1,679	Yes	3,321
Sui generis (energy centre)	500	925	787	Yes	138
Sub total for uses	175,079	287,075	323,260	Yes	0 Exceeded maximum by 36,185
Parking, servicing, plant and storage	17,000	43,666	24,017	Yes	19,649

Total	192,079	330,741	347,277	Yes	0 Exceeded maximum by 16,716
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The masterplan cumulative floor areas as of May 2021 with the submitted Plot H1 proposal

150. With the proposed Plot H1 development included (assumed to be office and retail uses), the table above shows how the OPP's minimum area for office floorspace would be achieved and the maximum area for office exceeded by over 51,000sqm. If the health centre is provided instead of 6,796sqm of proposed office space, the D1 community use area maximum area would be exceeded as well. The scale of the Plot H1 proposal means the cumulative floor area exceeds the maximum caps of the OPP. These exceedances are why a standalone, full planning application has been submitted, in order to optimise the redevelopment of the Plot H1 site.

4) Open space provision

151. The OPP requires a minimum of 4.3 hectares of accessible public realm to be provided across the Elephant Park masterplan. At the point that Park Pavilion RMA was approved (as the most recent RMA approval), the cumulative total of public realm was 4.796 hectares across the masterplan site, of which 0.22ha would retail spill out space in front of restaurants, cafes etc. Therefore the site-wide figure already exceeds the minimum of 4.3 hectares, and would be further increased by the public realm provided in Plot H1.
152. The application site for Plot H1 includes 0.39ha of public realm, but part of the application site overlaps with Plot H2's public realm, Deacon Street, Walworth Road and Elephant Road highways; excluding these areas to prevent double counting leaves 0.22ha of additional public realm being proposed by this application. It should also be noted that the colonnade around part of the building would enclose 0.05ha of this public realm, and spill out areas for tables and seating for the ground floor units are suggested, reducing the open public realm to 0.17ha. Even without the colonnade, the proposal adds further public realm to exceed the minimum area required by the OPP across the masterplan.
153. Most of the trees on Walworth Road are to be retained, and new tree planting is proposed (detailed in the landscaping topic section below) so that the site-wide no net loss of trees requirement is achieved. As no residential use is proposed in this application, no further play space is proposed.

5) Car parking, motorcycle parking, and cycle parking

154. The OPP sets a site-wide maximum of 616 on-plot car parking spaces and 62 on-street car parking spaces. Plot H1 includes only two on-street parking spaces which would bring the site-wide total to 186 spaces on plot, and 9 on-street car parking spaces, far below the maximum. No motorcycle spaces are proposed so the site-wide total remains at 23 spaces. Cycle parking provision would be made in line with the current planning policy (detailed in the Transport section below). The area of the servicing yard within the proposed building would sit within the site-wide areas allowed for in the OPP.

6) Transport and highways

155. The OPP section 106 agreement secured a list of highway works to be undertaken within the site and on adjacent highways. Some of these works have been completed alongside the earlier phases of the masterplan, and those that remain to be done are linked to the phases currently under construction or Plot H1. The highway works to install a pedestrian crossing on Walworth Road (near the railway viaduct), the raised entrance on Elephant Road, and resurfacing of Elephant Road are closest to Plot H1. These outstanding works would be required to be completed ahead of occupation of Plot H1 (if not already undertaken by the rest of the masterplan) in a new section 106 agreement for Plot H1. See the transport section of the assessment below for further information.

7) Utilities

156. Plot H1 does not need to provide significant utilities as the surrounding plots in the masterplan have already provided the corridors it would connect into. It would need to connect into power, water, telecoms and the district heating network, and provide surface water attenuation for itself and as part of the site-wide provision.

Conclusion on the relationship with the OPP

157. The scale of the Plot H1 proposal does not fit within the approved parameters and development controls of the 2013 Elephant Park masterplan OPP. It would provide office floorspace to enable the minimum site-wide floorspace for office use to be achieved – indeed the scale of the office proposal would also exceed the maximum office floorspace limit of the OPP, and the site-wide floorspace limits of the OPP. The height and massing of the proposal sit outside the approved massing envelopes of the OPP. Lendlease has therefore submitted a full planning application, as the reserved matters route would not be appropriate.
158. The fact that the proposal exceeds the limits of the OPP and departs from the approved masterplan are not by itself a reason to refuse this application; this full planning application must be assessed against the current development plan and material considerations, and its impacts (including its environmental impacts) are considered in later topics in this assessment. The public realm, retained trees and new trees, and transport requirements of the OPP have been considered and the proposal contributes to these site-wide requirements, as set out in later assessment topics, and a new s106 agreement would continue the relevant obligations for a separate Plot H1 permission.
159. Objections were received suggesting the current proposal would prejudice the OPP's obligations and that there is insufficient information in the reconciliation statement, however for the reasons set out above, this is considered not to be the case. Earlier RMAs have shown how the site-wide OPP obligations are to be met and construction of the full masterplan is underway. A Plot H1 permission, with its own s106 agreement containing obligations including conformity with particular OPP obligations, can be implemented alongside the near-complete Elephant Park OPP masterplan development. The development of this plot would not impact upon the RMAs previously approved which have been

constructed or are under construction, and their contribution to the OPP's minimum requirements or site-wide planning obligations. The council will require a deed of variation application to be submitted by the applicant to formally remove the Plot H1 site from the OPP if a new Plot H1 permission is implemented, as a formality to prevent overlapping permissions.

Environmental impact assessment

160. The proposed development falls within Schedule 2, Category 10(b) "Urban Development Project" of the Environmental Impact Assessment (EIA) Regulations 2017 and constitutes EIA development, having regard to its potential for likely significant environmental effects. Due to the nature and scale of the proposal, and as a phase of development with the wider Elephant Park masterplan (which was itself EIA development), an Environmental Statement (ES) was submitted alongside this Plot H1 application.
161. 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. The submitted ES has been advertised and consulted upon in accordance with the regulations. The environmental information has been considered in the assessment of this application.
162. The likely significant effects resulting from the proposed Plot H1 development are identified and considered during the construction stage as well as the completed, occupied and operational stage. The likely effects assume the implementation of mitigation proposed within the planning application. Should the mitigation measures within the scheme still give rise to significant adverse environmental effects then additional mitigation is proposed. The ES has considered cumulative effects arising from the proposal in combination with 13 consented and proposed developments in the area, notably the Shopping Centre redevelopment. The rest of the Elephant Park masterplan has been incorporated into the future baseline scenario.
163. The ES volume 1 contains 12 topic chapters; 1) introduction; 2) EIA methodology; 3) existing and future land use and activities; 4) alternatives and design evolution; 5) the development; 6) the works; 7) socio-economics; 8) air quality; 9) wind microclimate; 10) daylight sunlight overshadowing light pollution and solar glare; 11) greenhouse gases and; 12) effect interactions. The ES volume 2 contains the townscape, visual and above ground heritage (TVAGH) effects assessment as two further topics. These topics are in line with the discussions held with the council prior to submission. No formal scoping opinion request was submitted. Many of these topics, such as air quality, wind, daylight and townscape are considered as separate topic chapters in the assessment section of this report to set out the likely environmental effects and residual impacts of the scheme. The greenhouse gases chapter is summarised within the energy and sustainability section later in this report. Townscape and visual impacts are considered as part of the design topic, and above ground heritage in the heritage topic.

164. The ES volume 3 contains the technical appendices, and the ES volume 4 is the non-technical summary. Relevant elements of the ES were updated in response to the scheme revisions made in December 2021 within an ES Statement of Conformity, which had appendices relating to: wind; daylight, sunlight, overshadowing, solar glare and light pollution; and townscape, visual and above ground heritage.
165. The ES describes the proposed works, and assumes a construction phase of 3 years when assessing the construction stage environmental impacts. The EIA regulations require the ES to provide information on the alternative options considered by the applicant. The ES considered alternative development schemes as a “do nothing” no development scenario, the OPP scenario (of the remaining floorspace within the approved areas of uses), and alternative approaches to design taking account of the constraints, and different massing studies. Alternatives uses were not considered by the applicant beyond the OPP scenario as a commercial led scheme was appropriate given the existing uses surrounding the site and the approved development. This is considered to be appropriate.
166. The ES was reviewed by LUC on behalf of the council. LUC raised a series of points of clarifications and potential regulation 25 requests, and the applicant has provided further information in response. The ES Statement of Conformity received with the December 2021 amendments was also reviewed by LUC. LUC considers the ES to be acceptable for the topics it addressed, and that the May 2021 ES remains valid for the development when taking into consideration the amendments proposed, without giving rise to any new or significantly different environmental residual effects compared to those identified in the May 2021 ES. The ES information has been taken into account when assessing the application. Officers are satisfied that the ES is up to date and adequately describes the effects in the ES to properly identify the likely significant effects of the proposed development on the environment. It allows a fully informed assessment of the environmental effects of the proposal.
167. The ES socio-economic topic is one that does not readily fit into the later assessment topic headings. This ES chapter considers the impacts of the employment opportunities, office floorspace (including affordable workspace) and the other proposed land uses, and the public realm. The assessment concluded that there would be a minor beneficial effect of local jobs for Southwark residents. The applicant stated that they will commit to provide 10% of office jobs and 20% of retail jobs being taken by Southwark residents. The mechanism for calculating employment and skills targets at the proposal is expected to be largely the same as for the OPP. If part of the proposal is used for affordable workspace, the effect is considered to be of major beneficial significance. If part of the proposal is used for health then that is considered also to be of major beneficial significance. The benefits of end use employment for local residents, the health hub or affordable workspace would be secured on any permission. No adverse significant effects were identified for the completion or operation of the proposal and therefore no additional mitigation is deemed to be necessary.
168. The chapter on effect interactions considers that the significant effects on upon surrounding properties would interact in terms of the change to the daylight and

sunlight reaching residential properties (e.g. Mawes House, Tantallon House, Plot H2, H4 and H7) and the changes to their visual setting from this proposal and the Shopping Centre redevelopment. The impacts on neighbour amenity is considered in a later topic of this report.

169. The ES sets out the mitigation measures to reduce negative environmental impacts. These include mitigation incorporated within the proposal scheme itself and additional mitigation measures. The mitigation would be secured by recommended conditions and planning obligations to reduce the adverse environmental effects of the proposal, and to secure the benefits.
170. The mitigation measures to be secured by either conditions or s106 planning obligation for the ES topics are summarised in this list:
- The works – securing a construction environmental management plan (CEMP, to include a construction waste management plan, traffic management plan, logistics plan, and to secure the hours of work in line with the council's hours) by planning obligation, and compliance with the submitted arboricultural method statement would be required by a suggested condition.
 - Socio-economic – securing the benefits of construction phase jobs and training, and end use jobs and training proposed within the scheme, the health hub or affordable workspace as planning obligations.
 - Air quality – the ES found that no mitigation is needed for the operational phase. Construction phase mitigation for dust levels to be secured by condition and as part of the CEMP.
 - Wind – the landscaping within the scheme (retained mature trees, new tree planting and moveable pots) would mitigate the localised wind conditions, and would be in place before opening and occupation of the proposal. Landscaping conditions are proposed to secure the planting and for it to be in place prior to first occupation.
 - Daylight and sunlight – no mitigation is proposed by the ES. Conditions relating to external lighting and the materials are recommended to allow the impacts on neighbour amenity and solar glare to traffic to be considered at the detailed design stage.
 - Greenhouse gases – mitigation measures in the construction phase such as a waste management plan to minimise waste and having no construction car parking on site would be captured in the CEMP. In the operation development, transport measures to encourage sustainable modes, use of a travel plan and energy reduction measures would be secured on any permission, and a carbon offset financial contribution.
 - Effect interactions – no mitigation is proposed.
 - Townscape and visual – hoarding would screen the lower part of the construction for part of the construction phase (to be detailed in the CEMP). No additional mitigation is proposed for the operational phase. The design quality aspects of materials, mock up, detailed drawings and landscaping would be secured by conditions.
 - Above ground heritage – no mitigation is proposed beyond the design changes already made to the form and design of the proposal to reduce the potentially adverse effects of the ability to appreciate the significance of heritage assets.

171. Later topics of this assessment consider the likely environmental effects from the proposal. Consultees have not raised issues with the scope or detail of the ES. In summary, the submitted May 2021 ES and the December 2021 ES Statement of Conformity are sufficient to allow an informed assessment of the proposal's likely environmental effects.

Design, including layout, building heights and fire safety

172. The NPPF stresses the importance of good design, considering it to be a key aspect of sustainable development. Chapter 3 of the London Plan deals with design related matters. In particular, policy D4 focuses on delivering and maintaining good design and policy D9 sets out the requirements for the development of tall buildings; the proposal at 18-storeys is a tall building. The relevant Southwark design policies in the Southwark Plan are policies P13 "Design of places", P14 "Design quality" and P17 "Tall buildings".

Site context

173. The proposal is not located in a conservation area however, due to its height and location it is would be visible from surrounding conservation areas. Its impact on the setting of listed buildings in the area, and the Westminster World Heritage Site are considered in a later assessment section.
174. The OPP took into account the historic environment setting as well as the character of the wider area and included as part of the approved documents, detailed plot-by-plot design guidance in the approved Design Strategy Document (DSD). The OPP established the urban principles of the proposed redevelopment of the Heygate Estate and is characterised by a new gridded pattern of streets and routes with perimeter blocks and tall buildings in key locations, as well as a set of character areas for the proposed masterplan. This urban framework, detailed design guidance, and character appraisal set down the key design principles for the subsequent RMAs. The DSD took into account the local setting of the masterplan and considered the appearance of the proposed development in detail. As a full planning permission, the current application is not bound by the approved OPP parameters and DSD, and its design is to be judged on its own merits against current policies and material considerations.
175. Plot H1 is at the closest location of the masterplan to the heart of the Elephant and Castle town centre, directly opposite the mainline railway station. The plot sits within the DSD's Walworth Road Character Area at the boundary with the Park Character Area. Its frontage onto the Park Character Area and Walworth Road means that it will need to play an important role to reinforce the "high street" nature of the Walworth Road and help to reinforce the park edge.

The proposal

176. The approved outline proposal for this plot in the OPP related to a residential-led development and included two blocks, a tower and an allowance for communal gardens. The current proposal broadly adopts the established maximum height parameter for the tower on this plot (although it is approximately 3m taller and noticeably larger in massing) and re-imagines the scheme as a fully commercial

proposal. The result is a commercial block, lower at its Walworth Road and Deacon Street corners and rising to the height of the consented tower at the northern end of the plot, but would be far wider than the consented tower, and as one larger building rather than one tower and lower blocks.

Site layout

177. Plot H1 has public frontages on all sides, as was the case in the OPP, and so needs to integrate well with its surroundings on each side. The earlier assessment topic showed where the footprint of the proposal at ground and upper levels fits within, and in a few locations exceeds the maximum OPP floor extent parameters.
178. The plot's position has been designed to retain and continue the northern building line established by the mansion block of Plot H7 to the east and helps to define the southern park edge. The line of the northern elevation sits within the maximum OPP floor extent parameters for all floors. The northern elevation would contain the main office entrance, so that it would be visible from Elephant Road, the train station, Castle Square and future routes through the Shopping Centre site.
179. The eastern façade at ground level onto the park plaza aligns with the Sayer Street frontage, continuing this shopping street further north, although the upper levels above the colonnade would sit forward of this building line, so that the plot would be visible along Sayer Street. The line of eastern elevation sits within the OPP floor extent parameter for the upper floors. It slightly exceeds the maximum OPP extent parameter at the ground level due to the colonnade columns sitting just beyond the parameter line, although the recessed frontage of the base of the building sits within the OPP parameter.
180. On Deacon Street, the proposed building line allows for a new pavement (at least 2m wide) and planters to be created on the northern side of the route, and the building is set 17m to 31m from the facing facades of Plot H2. The frontage sits within the OPP floor extent parameters at ground and upper levels.
181. As happened with the Plot H2 and H3 developments to the south, the Walworth Road frontage is set behind the retained mature trees and provides a second pavement as another pedestrian route set away from the road. The south-western frontage continues the commercial uses (either office, retail or health) on this main road, reinforcing the "high street" nature of Walworth Road, as promoted by the OPP. This south-western frontage of the current proposal sits in part (at its northern extent) beyond the OPP floor extent parameters at ground and upper levels, as shown in the reconciliation topic section earlier in the report. At Plot H1 and the junction of Elephant Road, Walworth Road starts to curve westwards, and the proposed south-western frontage is aligned to better address the alignment.
182. The Elephant Road side includes a wide, landscaped pedestrian route, wider than the existing pavement. The colonnade on the western side of the building would provide further width for pedestrians, although some of this area may be used for spill out seating from the active lobby uses. The north-western frontage

sits slightly beyond the maximum OPP floor extent parameters at ground and upper levels.

183. Pedestrian entrances into the building are proposed at frequent intervals along the Walworth Road, Elephant Road, northern side and park plaza side into the flexible use active lobby and ground floor units, to put activity and shopfronts onto these sides of the building. These would be flush accessible entrances. The central core of 12 lifts and three stair core would provide level access to all floors, with six lifts and two stair cores up to the top floors. Accessible toilets are shown on each floor.
184. One entrance into the active lobby is shown indicatively into the lobby on the Deacon Street side. The applicant has sought to maximise the amount of active frontage on Deacon Street by continuing the units around the two corners of the building. The central part of this frontage (approximately 35m long) contains the servicing yard access as the only vehicle entrance into the building, as well as the security office, plant and fire escapes. This length of inactive frontage was queried by the GLA who asked for further design options to be explored. All other frontages of the plot are active frontages. These ancillary parts of the development are necessary within one or more frontages of the site; Deacon Street is the most appropriate frontage for vehicle access, and in line with what the OPP anticipated. The servicing yard has been offset from the main residential entrance to Plot H2. The applicant has sought to reduce the prominence of the servicing entrance by using consistent materials and façade pattern to this frontage, having climbing plants up the columns either side of the entrance, and the proposed planting in the pavement planters would provide some screening in views along Deacon Street. The material for the lower parts of this façade would tie into the other frontages of the building.
185. Aside from the comment on the Deacon Street frontage, the GLA considered the proposed layout to form a coherent pattern of blocks that responds well to its setting and wider masterplan for the area, and at street level achieves a high level of activity, which is supported. The site layout of the building is considered acceptable, and the detail of the landscaping around the building is assessed in a later part of this report.

Height, scale and massing

186. The reconciliation topic earlier in this report showed how the current proposal has greater height and massing than the OPP parameters, which is why a full planning application has been submitted. As a tall building, the 18-storey proposal needs to be considered against all the requirements of Southwark Plan policy P17 “Tall buildings” which in part 1) identifies areas where the council expects tall buildings, typically within the CAZ, Opportunity Areas and major town centres. The site is within an area identified by the Southwark Plan where tall buildings are expected to be located. The proposal addresses part B of London Plan policy D9 in this regard.
187. Each of the seven subsection requirements of part 2) of policy P17 will be considered below, that a tall building 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.

Be located at a point of landmark significance (subsection 1)

188. The plot stands at the confluence of a number of routes particularly the main Walworth Road and Elephant Road, desire-lines in the final approaches to the railway station, and fronts onto Castle Square and new park. As such it is considered to be a point of landmark significance and complies with this aspect of policy P17 part 2) subsection 1. The OPP approved a tall building at the northern side of the plot, fronting onto Elephant Road and Castle Square, so this plot has previously been considered appropriate for a tall building, albeit one of a different height and form and assessed against the previous development plan policies.

Have a height that is proportionate to the significance of the proposed location and the size of the site (subsection 2)

189. The OPP allows for a tower in part of Plot H1 up to a maximum height of 82.55m. This earlier OPP recognised that the north-western part of the plot was appropriate for a tall building because of its location and the size of this plot.
190. The plot size remains as the OPP plus the overlapping area of Deacon Street. The current 18-storey proposal exceeds this maximum height by approximately 3m, and increases upon the OPP height for the rest of the plot, as set out in the reconciliation topic section earlier in this report. However the principle of this plot being suitable for a tall building of a slightly larger but similar scale to the OPP, at the junction of Walworth Road and Elephant Road, close to the train station, and next to the public spaces of Castle Square and the park remains appropriate. A tall building on this site would help to reinforce the spatial hierarchy of this area, and help to mark the train station. The maximum height of this tall building is considered proportionate to the significance and size of this site. As set out in the paragraphs below, the sculpted massing and design of the proposal are appropriate too. The proposal complies with subsection 2 of policy P17, and part C.1) b) of London Plan policy D9.

Make a positive contribution to the London skyline and landscape (subsection 3)

191. The visuals of the proposal in the townscape assessment show that in most views of the local area, the proposed tall building would be seen alongside other tall buildings, often taller towers, in the area which are more visible in the skyline. Once constructed, the tower at Plot H7 to the east of the site, and the towers

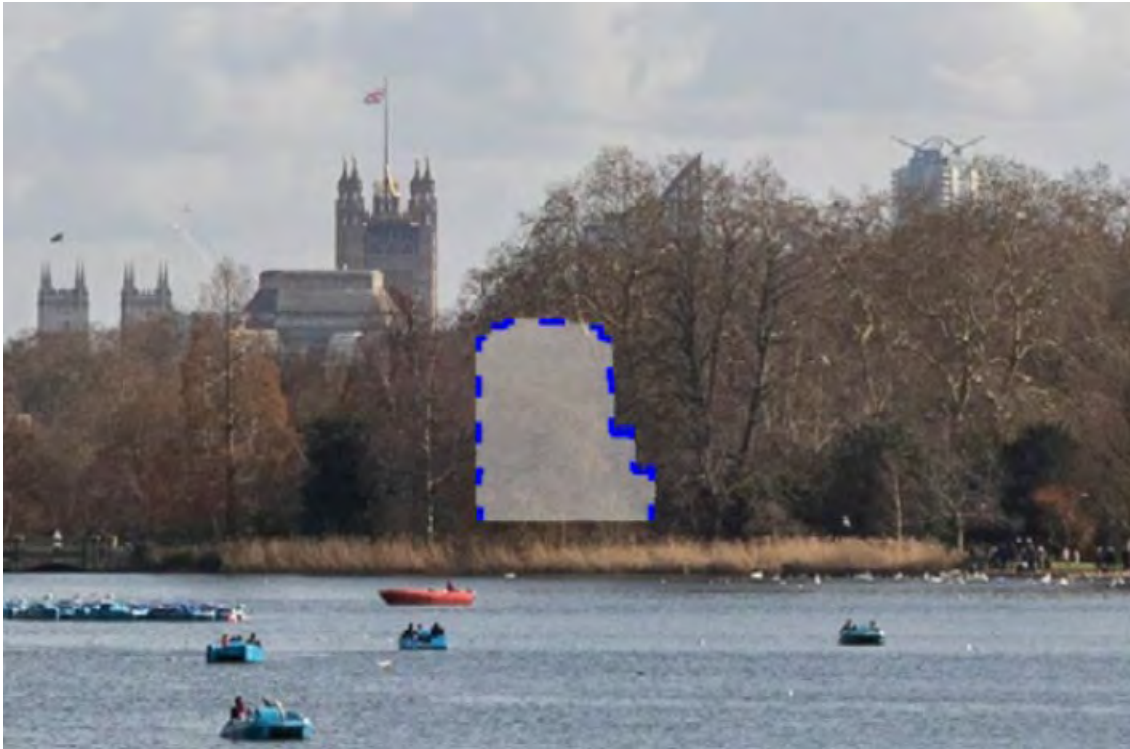
within the approved Shopping Centre to the west would also provide additional context in the local skyline. Some of the visuals are included in later sections of this report for reference, and the next policy subsection considers the impact on designed London and borough views.

192. Compared with the taller heights of other towers in this area, the proposal would not be sufficiently prominent to contribute to the wider London skyline, but it would be a feature at a more local level where its curved, sculpted massing and fin pattern across the façades would add to the local skyline.
- From the south looking along Walworth Road, the proposal generally would be viewed alongside the taller tower of Plot H2 to the immediate south (31-storeys and 104.8m AOD), and Plot H3 further south (19-storeys and 67.5m AOD). From the south-west, the proposal would be viewed between (and sit lower than) the Plot H2 tower and Strata tower.
 - In views from the west, the proposal would be seen next to Strata tower, the future Shopping Centre redevelopment towers, and in longer views alongside One the Elephant. The revised north-western elevation of the building has added interest to this façade in views from the central Elephant and Castle area.
 - From the north-west and north views of the proposal in the skyline would be limited by Tantallon House and Portchester House, and future Shopping Centre development. Closer to the site, looking down Elephant Road is where the massing of the proposal would be a substantial change as the building is much wider than the Plot H2 tower. The stepped form of the western terraces, curved corners, creases, terraces and the fin pattern would provide a distinctive design in these proximate views which adds to the local skyline.
 - In views from the north-east and from the east along New Kent Road, the proposal would be mainly screened by the tall buildings in Plots H4, H5, H11a and H11b. Similarly from the south-east Plot H1 would be mainly screened by or appear alongside the other tall buildings within the masterplan that have been constructed or are currently under construction.
193. The tall building policies in the development plan for Southwark place great weight on the need for a substantial contribution to the landscape. The principle behind this is that the substantial gain achieved by optimising a site in this way, is matched by a proportionate public benefit in the landscape, as well as the need to ensure that a tall building has a suitable public setting.
194. This plot is within the wider Elephant Park estate which includes the substantial new park at the centre of the approved masterplan adjacent to Plot H1, and new public realm. While the park was always considered to form part of the substantial contribution to the landscape across the masterplan, this Plot H1 proposal would, as a result of its separation from the consented OPP masterplan and its significant increase in scale from the approved parameters, still have to address this aspect of the policy directly.

195. Plot H1 includes a park frontage and is within the Park Character Area of the masterplan; the park is very much a part of its setting. The proposed public realm on the northern side of the building would include planting and planters to provide a green connection between the park, the base of the building and its series of planted roof terraces up the full height of the building. The public realm on the eastern side of the plot alongside the pavilion plaza, the colonnaded space beneath the proposed building, the generous planters on the Walworth Road and Elephant Road frontages form the contribution to the landscape of this proposal. A total of 0.39ha of landscaping is proposed within the application site, some of which is existing highway and pavements meaning the proposal provides 0.2ha of additional public realm as well as improving the pavements. Further consideration of the landscaping in the proposal is include in a later assessment topic. In summary, the proposal has made sufficient contribution to landscaping within the plot and adjacent highways. Lendlease's wider masterplan's provision of the new central park and pavilion plaza alongside the plot are also noted and provide a suitable existing setting for the proposal.
196. The proposal has successfully addressed the skyline and landscaping part of Southwark Plan P17 part 2) subsection 3 and part C.4) of London Plan policy D9 in terms of its cumulative impact.

Impact on strategic and borough views (subsection 4)

197. In terms of strategic views, the plot sits in the background of the strategic view from the Serpentine Bridge (LVMF view 23A) which includes a strategic vista – a geometrically defined protected visual plane – towards the Westminster World Heritage Site. Visuals were provided in the TVAGH to show the appearance of the proposal from different points of the Serpentine Bridge in Hyde Park, and further information provided in response to the GLA comments on the impact on the LVMF view and setting of the World Heritage Site.
198. From the centre of the bridge (the viewing location of the LVMF view 23A) the proposal would be fully screened by trees and buildings, and would not be seen alongside Westminster World Heritage Site. For this reason the proposal would have no effect on the LVMF view. The visual below taken from the TVAGH shows the Plot H1 form with a dashed blue outline.



Telephoto from the LVMF viewing location on Serpentine Bridge

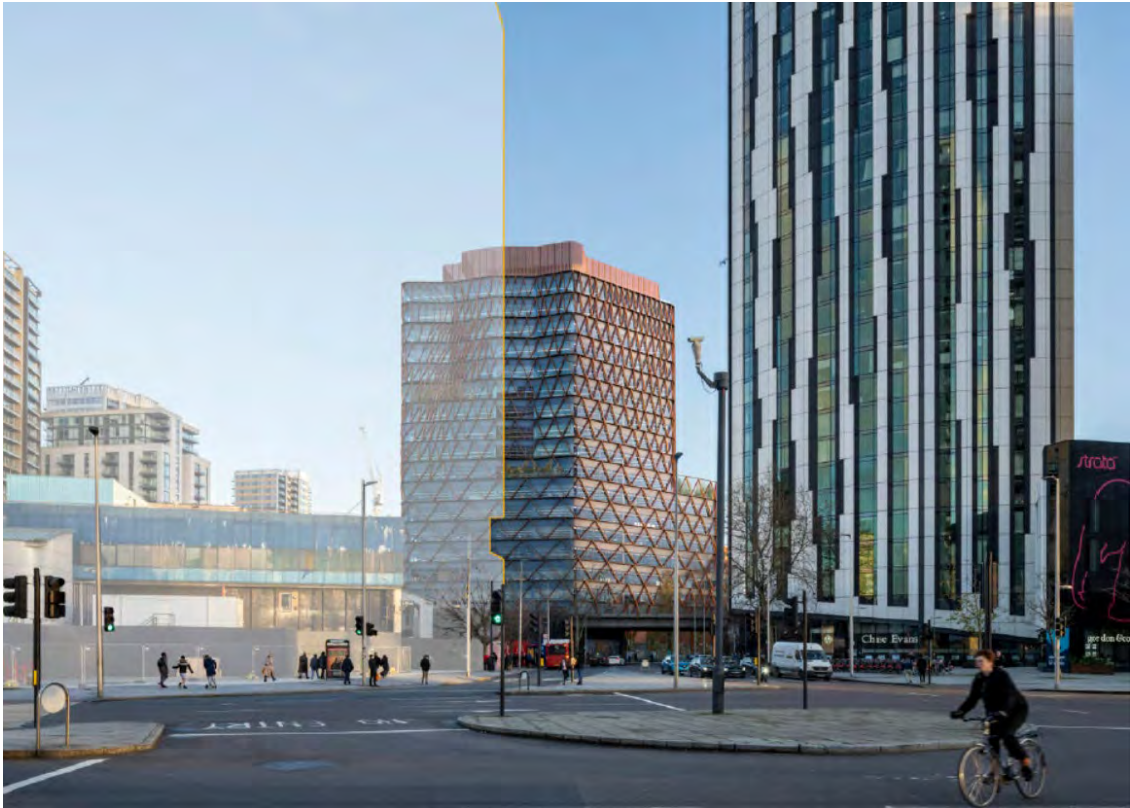
199. In terms of other strategic views, the proposal is located away from the wider setting consultation areas of (and would be barely discernible in) the LVMF London panorama views from Alexandra Palace, Kenwood, Parliament Hill and Primrose Hill, and cause no harm to these strategic views.
200. Turning to the borough views, the site lies approximately 60m to the west of the new linear view of St Paul's Cathedral along Camberwell Road. The proposal would not be visible from the viewing place, and would have no impact on the view of St Paul's Cathedral.
201. Therefore the proposal is considered not to have a harmful impact on strategic London views, nor the borough views, and would comply with subsection 4 of part 2) of Southwark Plan policy P17. It would also comply with London Plan policy D9, part C.1) a) in terms of impacts on views.

Respond positively to local character and townscape (subsection 5)

202. The plot is located at the edge of the Elephant Park masterplan, and has significantly increased massing compared with the approved OPP parameters. A TVAGH was provided as part of the ES, including images to indicate the effects of the proposal on the local townscape and on heritage assets.
203. The ES considered the impacts upon the character areas within 250m of the site, and provides 17 visuals of the existing, proposed and cumulative scenarios. London Plan policy D9 part C4 requires consideration of the cumulative impacts of a tall building on an area. The ES topic of townscape and visual impacts considered that by changing the character of the site, the construction phase of the development would have significant direct, temporary, short term, local effects that would be minor to moderate in scale and adverse in nature. The effects of the completed 18-storey proposal on townscape (and the different

character areas around the site's context) would be long term. The ES considers the effects on nine different townscape character areas from which the proposal may be visible; and concludes the effects range in scale from insignificant to moderate, and are either insignificant (where fully or partly screened by other buildings) or beneficial in nature.

204. The ES has placed the site within the Walworth townscape character area, at its western edge with the rest of the masterplan and most of the character area to the south-east. The ES has given this area a low value of ordinary quality that includes some individual buildings of heritage interest, and the impact on heritage assets including the recently designated Yates Estate and Victory Conservation Area are considered later in this report. As the townscape character area includes the completed tall buildings within the masterplan, the ES categorises the susceptibility to change by the additional tall building as very low to low. The ES considers the proposal to have an insignificant effect in the more distant parts of the area, to a moderate effect nearer to the site where the impact would be greatest. The magnitude of the change would similarly range from negligible to high, depending on proximity to the site. The ES concludes the effect would be beneficial in nature by developing the site with well-defined, active frontages that interface with Walworth Road, Castle Square and the park, the enhanced permeability and connectivity, and distinctive architecture.
205. The area to the west of the application site is within the ES's Elephant and Castle town centre townscape character area. The ES gives this area a townscape value of low to very low due to the lack of legible townscape structure and coherence, and a very low susceptibility to change due to the tall buildings in this area and its setting. The proposal would be visible from within this townscape character area; closest to the site the magnitude of the townscape character change would be high, and reduce to low further away. The townscape effect would range from insignificant to moderate; as the proposal would fit within and add to the variety within the existing modern, tall character of this townscape character area, the ES considered the effect to be beneficial in nature. One example of how the proposal would appear from within this townscape character area is included below. The proposal would be seen alongside Strata tower and the approved Shopping Centre redevelopment (shown in orange wireline on the left).



Visual of the proposal viewed from St Mary's Churchyard, with the outline of the approved Shopping Centre redevelopment indicated on the left hand side

206. The Walworth Road corridor townscape character area extends to the south of the application site along this main road and westwards to the railway viaduct. The ES consider it to have a low value that has local heritage interest and heritage buildings, and to have a low susceptibility to change from an additional tall building as its setting already includes tall buildings of equivalent height. The Plot H1 proposal would make a high magnitude change to the northern setting of the townscape character area, which would reduce to a low magnitude further south when the proposal is seen next to the 31-storey tower of Plot H2 and 19-storey Plot H3 tower, and a negligible change further away. The ES concludes the scale and nature of the proposal's townscape effect to be insignificant to moderate and beneficial in nature, as the setting of the character area would be enhanced by the new street frontage, in a distinctive, contrasting architecture to mark the entrance to the town centre.
207. The townscape effect of the proposal is found by the ES to be insignificant to three more character areas, and insignificant to moderate to a further three character areas.
208. The proposed building as one unified design is significantly larger than other buildings in Elephant Park which typically consist of a slender tower and lower mansion blocks set around a podium, which breaks up the appearance of the plots into different elements. The proposed building is much larger than the rhythm of regular divisions in the terraced shops found along Walworth Road, and the railway arch units along Elephant Road. The townscape around this site is one of tall buildings of varying heights, forms and architectural styles however.

209. What could have been designed as a monolithic block taking up the full extents of the plot, has instead been sculpted to create south and east-facing terraces and a stepped form that rises to the north. The resulting form is highly articulated that starts low at the Walworth Road and Deacon Street corners, and rises to its full 18-storeys in height at the northern end of the site closest to Castle Square and the station. The series of terraces and set backs have sculpted the form at its southern corners and eastern side to link to the park to appropriately respond to its context. The layout of the proposal provides active frontages to appropriately address Walworth Road, Elephant Road, Castle Square, the park, and Sayer Street, while allowing for improved connectivity in the public realm routes around the building.
210. The proposal sits at the intersection of two roads and the park which each have a different character: the Park character of Elephant Park (as identified by the Park Character Area of the masterplan); the High Street character of Walworth Road (as identified by the Walworth Road Character Area of the masterplan); and the Station character of Elephant Road. The design responds to these three character areas in a deliberate way. Each area has its own defining characteristics and requires a tailored approach. Walworth Road is high street with active edges and, on this side of the road, a well-established mature landscape. The park has a strong edge defined by mansion blocks with taller elements at Plots H7 and H11B. The station character is defined by the active edges of the viaduct and the busy transport interchange, facing onto Castle Square and Plot H1.
211. On Walworth Road the building is set behind the mature landscaping and designed to start at 5/6 storeys at its south-western corner and step up to its maximum height. In this way it responds to the modest character of the surrounding buildings and introduces the height and massing which is concentrated nearest the railway station. On the park frontage the building follows the established building line of the neighbouring Plot H7 and completes the southern edge of the open space. The double-height colonnade extending along this frontage helps to soften this edge further and allows the landscape to extend to the building's front door. The building is stepped up in terraces and articulated with undulating bays to soften its appearance onto this important public space. The undulating façade and colonnade extend round onto the Elephant Road frontage where the building is at its tallest and where access to the transport hub will be enhanced by the substantially widened footpath.
212. While the building uses contrasting modern materials and rises sharply to its maximum height, the design is articulated and sculpted in response to each of these distinct characters. In addition the trellis-like "veil" of the façade fin pattern, coupled with greening introduced at the terraces, would also help to soften the appearance of the building. It is considered that the building has responded positively to its local character.



Visual of the colonnade and planting at part of the northern façade

213. This proposed tall building would relate to the existing and future tall building cluster in this part of the Elephant and Castle town centre, as visuals later in this section will show. It would have a distinctive architecture that would complement the different styles within the masterplan and town centre. Visuals included in the heritage topic section below show how the proposal would be seen alongside the existing and approved tall buildings. The proposal was amended during the pre-application discussions and during the application to better respond to its context and setting.
214. The later paragraphs below expanded upon the architectural design and materials of the proposal. The proposal is considered to comply with subsection 5 of policy P17 part 2 by responding positively to the local character and townscape, and successfully addressed the visual impacts section of London Plan policy D9 part C.1)a), as well as taking account of the cumulative impacts with other approved developments in the area as required by part C.4.

Provide a functional public space (subsection 6)

215. The proposal includes landscaping around the building, the colonnade and the public lobby at the base of the building. The plot is part of the Elephant Park masterplan which has provided public realm and the first two phases of the central park (with one phase where the construction offices are yet to be laid out) immediately adjacent to Plot H1. The proposal's provision, and acknowledging the wider masterplan's public spaces, are considered to be sufficient functional public spaces for this scale of building. Further consideration of the landscaping is included in a later topic, and the public lobby in an earlier section of this report. The proposal is considered to accord with part 2) subsection 6 of Southwark Plan policy P17.

Provide a new publicly accessible space at or near the top of the buildings and communal facilities for users and residents where appropriate (subsection 7)

216. Southwark Plan policy P17 introduces a new element that a tall building must provide new publicly accessible space at or near the top “where appropriate”. London Plan policy D9 at part D states “*free to enter publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London*”. The proposal does not include such provision at or near the top, instead providing the public lobby at the base. Due to the proximity of neighbouring residential properties to the south, the area of roof level plant required for the building, and the potential impact of a dedicated rooftop access on the proposed design, it is not considered appropriate to provide such a space within the upper levels of this scheme. Instead, the ground floor lobby is intended to provide a range of facilities and activities, and the office terraces would provide communal facilities for office workers. It is also noted that the OPP did not include such a requirement, so there is no loss of public access to the top of a tall building on this site.

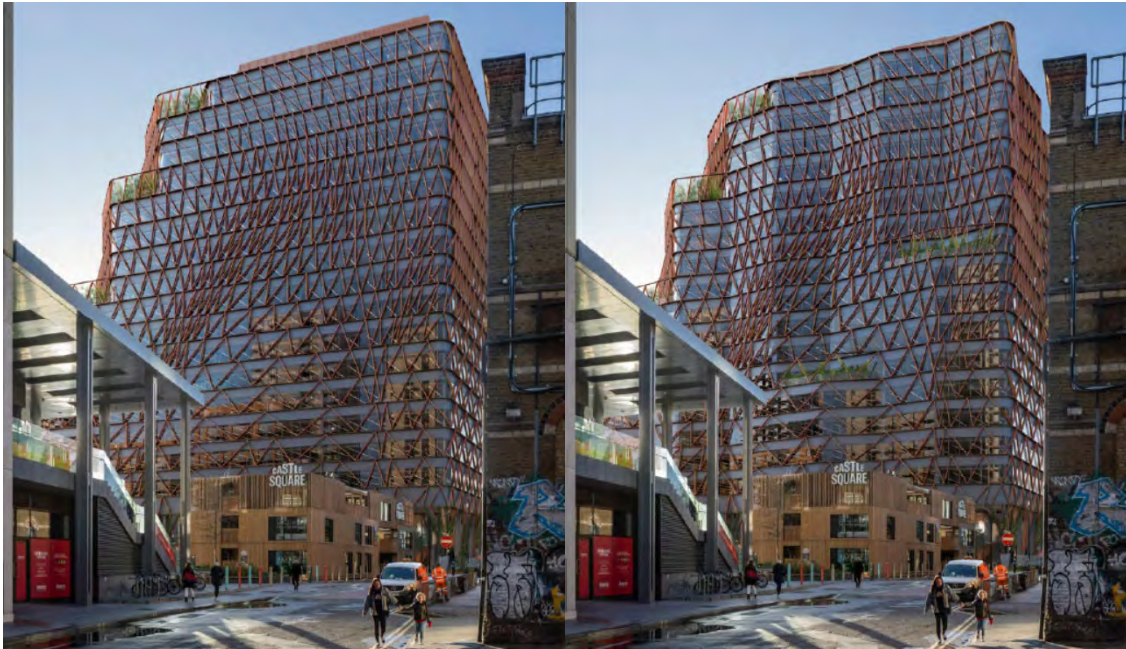
Architectural design and materials

217. Part 3 of Southwark Plan policy P17 sets out five aspects of tall building design that proposals are required to achieve. The first subsection requires tall buildings to “*be of exemplary architectural design and residential quality*”.
218. As a tall building, the architectural design must be exemplary. While there is no adopted definition of “exemplary” design in relation to a commercial building, the expectation is that this will be a highly sustainable and ambitious design, and contribute positively to its context. Plot H1 is a prominent location visible from a number of approaches and its architectural design would become a defining feature of the area.
219. The architectural design starts from the articulated block and then develops an architectural approach to the outer wrap around all elevations of the building. This approach was inspired by the work of Michael Faraday, a local scientist and pioneer of electricity and magnetic fields. The proposal comprises of fins installed across the glass façade and displaying a veil of “energy lines” projecting from the building. The pattern springs from the colonnaded base of the building and extends across the entire façade. At the set-back terraced areas the “Faraday Cage” forms a trellis-like enclosure to the terraces and introduces the potential for greening of the façade.



Visual showing the terraces and the fin pattern to the eastern part of the proposal

220. The fins are not only decorative but serve as a shading device by providing denser shading where necessary on the upper part of the southern elevation and opening up to have wider gaps elsewhere. The fins across the façade help to achieve the BREEAM “outstanding” rating. This undulating wave-like pattern of magnetic fields adds interest and delight, colour, and would provide solar shading the offices to contribute to the environmental performance of the design. The proposal would have a strong identity as a building on this pivotal location of the masterplan.
221. At the pre-application stage, the north façade facing was considered to be too broad and unrelenting, and suggestions of how to break up the façade with a vertical feature, projections or balconies, or by introducing greater depth in the façade were made. The originally submitted application scheme had not included such measures; the revised design is now more interesting and dynamic, giving the building a striking appearance to each façade. The addition of creases and further terraces to the northern and north-western sides added articulation to these wide façades, and better relate to the other sides of the building.



Visuals of the northern elevation from Elephant Road, as originally submitted (left) and as revised in the amendments (right)

222. The application drawings include detailed bay studies to show the base of the building with the tall colonnade and recessed frontage, and typical fin details. Further details of these would be required by conditions to ensure the design quality continues through to construction, and to allow for discussions on the colours and materials. Conditions requiring the materials and mock ups of the façade are also proposed to ensure an exceptional quality of materiality is secured as the visual success of the architectural façade is partly reliant on the use of high-quality materials. The proposal would accord with London Plan policy D9, part C.1)c) on architectural quality and materials and policy P17 of the Southwark Plan.

Design Review Panel

223. The Southwark Design Review Panel (DRP) reviewed a pre-application version of the proposal in February 2020. The Panel welcomed the development of this site and supported the proposal of a new commercial building in this town centre location. The Panel raised concerns about the overly bulky character and deep plan of the design, as well as the lack of detailed articulation of the façade, and encouraged a more developed path to net zero including science-based analysis. It also raised concerns about the landscaping and asked for it to be better integrated into the design.
224. The Panel invited the applicants to return to the DRP, however this has not been done following the positive revisions to the design made since the reviewed pre-application scheme. For example, the massing was adjusted with increased stepping to reduce the scale especially at the corner of Walworth Road and Deacon Street, and the December 2021 changes to articulate two façades. The deep plan character of the office floor plan has not been amended; this is in order to maximise the area and potential jobs provided by the building. There is no design policy that precludes such deep plan offices (providing its external design is acceptable) so in this respect the proposal is acceptable. The ventilation

requirements and any artificial cooling have been explained, as well as further information on the BREEAM “outstanding” rating, whole life carbon and circular economy elements of sustainability, which are set out later in this report.

Conclusion on the design of this tall building

225. The proposed design is distinctive, characterful and highly articulated. It is considered to be an exemplary architectural design and a fitting final piece of the Elephant Park masterplan contributing positively to the commercial vitality of the area. The quality of design will rely to a large degree on the quality of materials, architectural detailing and the construction of the façade. Subject to the recommended conditions about design detailing, the proposal is considered to comply with the design quality and tall building policies of the London Plan and Southwark Plan. The GLA response notes that the *“the scheme generally appears to have followed a design-led approach to the development of the scheme, in accordance with policy D4 of the London Plan”*, and considers the application has generally addressed the design and impact criteria of tall buildings as set out in policy D9. Later topic sections address the subsections of Southwark Plan policy P17 and London Plan policy D9 part C, regarding the impacts on heritage assets, environmental impacts (including wind, overshadowing and solar glare), energy efficiency and sustainability, functional impacts, and having a positive relationship with the public realm.

Designing out crime

226. The applicant team discussed the broad principles of Secured by Design with the Met Police to improve the safety and security of the proposal. The design of the development has considered opportunity for natural surveillance, incorporates excellent lines of sight, with few alcoves or secluded areas and the development should bring activity to this area. The Met Police commented that these are all excellent crime prevention measures. A two-part condition is included in the recommendation regarding Secured by Design accreditation and further details. Security measures, such as those to prevent hostile vehicles using the route across the north side of the building would need to be incorporated. Another condition relating to lighting, surveillance equipment and vehicle mitigation is proposed. Subject to these conditions, the proposal would comply with Southwark Plan policy P16 “Designing out crime”.

Fire safety

227. A fire statement was submitted with the application, as required by policy D12 “Fire safety” of the London Plan. It outlines the evacuation strategy, the active and passive fire protection systems (including consideration of the CLT parts of the building), external fire spread mitigation in the façade materials, access for fire service personnel and equipment, management and maintenance, and the later statutory approvals needed. The statement was compiled and reviewed by suitably qualified assessors on behalf of the applicant. The London Fire Brigade has no comments on the proposal, and the applicant has been in discussion with them since 2020. A condition to require compliance with the submitted statement (or any later revised version to be approved) is proposed to ensure compliance with London Plan policy D12. The proposal also complies with London Plan policy D9, section C.2)a) and D5 on inclusive design by providing

a fire evacuation lift.

Heritage considerations

228. Chapter 16 of the NPPF sets out the national guidance on conserving and enhancing the historic environment. The heritage polices set out in chapter 7 of the London Plan assert that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural details. London Plan policy D9 in part Cd) requires tall building proposals to take account of the significance of London's heritage assets and their settings, and part Ce) requires proposals to preserve and not harm the Outstanding Universal Value of a World Heritage Site. London Plan policy SD4 about the CAZ states in part C that the distinct environment and heritage of the CAZ should be sustained and enhanced. In the Southwark Plan, policies P19, P20, P22 and P24 seek to protect listed buildings, conservation areas, borough views and World Heritage Sites.
229. The council also has statutory duties with regard to heritage. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that, when considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting, or any features of special architectural or historic interest which it possesses. Section 72(1) of the Act requires that, with respect to any buildings or other land in a conservation area, when considering whether planning permission should be granted, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area. In this context "preserving" means doing no harm. This means that preserving the character and appearance can be achieved not only by a positive contribution to preservation, but also by development that leaves the character and appearance with no harm.
230. Plot H1 is located about 180m to the north of the Walworth Road Conservation Area and the grade II listed Southwark municipal offices (Walworth Town Hall), library and clinic buildings on Walworth Road and nos. 140, 142, 150 and 152 Walworth Road. The site is within the wider setting consultation area of the LVMF view 23A.1 from the centre of the bridge over of the Serpentine to the Palace of Westminster, and the proposal would be visible within the setting of the World Heritage Site. The development of Plot H1 may impact on the heritage significance or appreciation of the heritage significance of these assets. Below ground heritage, i.e. archaeology, is considered in a separate topic section in the report. The ES assessed the likely effect of the proposal on selected heritage assets.
231. As set out in paragraph 198 above, the proposal would have no effect on the LVMF view from the Serpentine View towards the Westminster World Heritage Site as it would be completely screened by trees. When viewed from the northern end of the Serpentine Bridge and looking towards the World Heritage Site, the very top of Plot H1 would be visible behind the base of the Winged Victory statue (which is outside the World Heritage Site) and to the right of Victoria Tower which is within the Westminster World Heritage Site. The proposal would be far lower than the Strata Tower and One the Elephant towers seen further to the right, and

55 Broadway to the right, but would remove a small area of the current sky from behind the statue.

232. In the cumulative scenario from the northern end of the Serpentine Bridge, the approved Shopping Centre redevelopment (shown in yellow wireline in the image below) would appear slightly higher and so screen the parts of Plot H1 closest to the statue. This results in the proposal removing a much smaller area of sky behind the Winged Victory statue in this view.



Telephoto from 40m north of the LVMF viewing location on Serpentine Bridge, showing the cumulative scenario with Plot H1 in blue dashed outline and other approved developments in orange outline

233. The limited and incidental visibility of the proposal close to the World Heritage Site from this part of the bridge, located almost 40m from the designated LVMF viewing location is considered to cause no harm to the ability to appreciate the Outstanding Universal Value of the World Heritage Site, particularly as in the cumulative scenario as the now-implemented shopping centre redevelopment would screen most of the proposal. Historic England made no comment on this impact.
234. The ES has considered the environmental effects of the proposal on conservation areas and listed buildings as heritage assets within 250m of the site. The conservation areas considered were as follows and the ES assessed the proposal's effect on each to be of a negligible magnitude and to be insignificant:
- Walworth Road Conservation Area
 - Larcom Street Conservation Area
 - Elliot's Row Conservation Area
 - Pullens Estate Conservation Area.

235. The proposal at a maximum height of 85.73m AOD would be visible along Walworth Road from within the conservation area, and towards it where it would be viewed alongside the Plot H2 and H3 towers (at 104.8m AOD and 67.5m AOD respectively) as shown by the two visuals below looking north along Walworth Road. It would consolidate the cluster of tall buildings at the northern end of Walworth Road. The proposal is considered to preserve the setting of the Walworth Road Conservation Area.



View from Walworth Road at the junction with Manor Place



View from Walworth Road at the junction with Steedman Street

236. The proposal would not have a harmful impact on the setting of the Larcom Street Conservation Area and the limited points where it would be visible at a distance behind the historic terraces, it would be seen alongside other tall buildings in the town centre. It would preserve the setting of this heritage asset.
237. From within Elliot's Row Conservation Area which is west of the site, parts of the proposal would be visible between the taller towers of One the Elephant and Strata in the town centre. It would appear at a similar scale as Draper House. The proposal would do no harm and preserve the setting of this conservation area.
238. The Pullens Estate Conservation Area is to the south-west of the site, and due to the orientation of the roads the proposal would not be prominent in views from the conservation area. Where it is visible, the proposal would be seen alongside and lower than the Strata and Plot H2 towers. The proposal is considered to preserve to the setting of this conservation area.
239. Yates Estate and Victory Conservation Area is a new conservation area, designated in November 2021. It is located to the east of Rodney Place, approximately 230m to the east of the application site. The approved buildings on Plots H11a and H7 would be located between the conservation area and the proposal, limiting the visibility of Plot H1 from the conservation area. Given this and the separation distance, the proposal is considered to preserve the setting of this new conservation area.
240. Further away, the proposal would not be visible from Trinity Church Square Conservation Area, nor Walcot Square Conservation Area (in Lambeth) and so would cause no harm these heritage assets.
241. The ES considered the effects of the proposal on the following grade II listed buildings:
- Metro Central Heights
 - Michael Faraday Memorial
 - Metropolitan Tabernacle
 - Railings, gates and piers to Old St Mary's Churchyard
 - Elephant House, 4 Victory Place
 - Star and Cross Church, Falmouth Road
 - Nos. 140-152 Walworth Road (John Smith House)
 - Southwark Municipal Offices (Town Hall) and attached railings, Walworth Road
 - Southwark Central Library (Newington Library) and Cuming Museum, Walworth Road
 - The Walworth Clinic, Walworth Road
 - Church of St John the Evangelist, Larcom Street.
242. In all cases, the ES concludes the environmental effects of the completed proposal on the setting of these listed buildings would be insignificant. The proposal is considered to preserve the setting of these listed buildings for the following reasons:

- The grade II listed Metropolitan Tabernacle is 170m to the west, separated by the Shopping Centre redevelopment scheme. The proposal would not be seen alongside the frontage of the listed building which is the most important part of its special historic interest. Given the separation distance and with the approved Shopping Centre scheme screening most of the Plot H1 proposal, it would preserve the setting.
- The grade II listed Michael Faraday memorial is 210m to the north-west, also separated by the approved Shopping Centre redevelopment, which would screen the proposals in views of the memorial from the north. The proposal would preserve the setting of this heritage asset.
- The grade II listed Metro Central Heights residential towers are 200m to the north of the site. Its setting already contains tall buildings, such as Tantallon House and Two Fifty One. While the approved Shopping Centre development would screen the proposal in most views, it is considered to preserve the setting of these tall listed buildings.
- A grade II listed K2 telephone box recently reinstalled in Elephant Park near to the junction of Ash Avenue and New Kent Road, following its removal off site and restoration. It is some 130m to the north of the Plot H1 site, and its setting is dominated by the tall buildings on either side on New Kent Road and behind (including Plot H2), and mature trees. The addition of a further tall building behind this K2 telephone box would not harm any features of special historic interest and would preserve its setting.
- The grade II listed Elephant House is 360m to the east of the site, and separated by other large and tall buildings within the Elephant Plan masterplan. The proposal would preserve the setting of this heritage asset.
- The grade II listed buildings to the south on Walworth Road (Southwark Municipal Offices (Town Hall), Southwark Central Library and Cuming Museum, The Walworth Clinic and nos. 140-152 Walworth Road) would experience no harm to their setting, due to the distance to the site, the screening of the proposal by the heights and scale of the Plots H2 and H3 in between, and the angled orientation needed to see the proposal behind or alongside these listed buildings. This is also the case for grade II listed Church of St John the Evangelist.

243. The effect on the grade II* listed obelisk at St George's Circus is shown in a visual provided as part of the ES townscape assessment, copied below. The upper parts of the proposal would be visible, of similar scale to the terraced buildings either side of the road, taller than the approved Shopping Centre redevelopment (shown in yellow wireline) that appears to the immediate right of the obelisk base, and lower than the Plot H2 tower further to the right. The proposal is considered to preserve the setting of this grade II* listed obelisk.



View of the grade II listed obelisk with the proposal's top visible above the approved Shopping Centre development (in orange wireline)*

244. The impact upon non-designated heritage assets has been considered, in terms of the terrace of Victorian buildings at the northern end of Walworth Road that face onto the application site. The proposal is of a much larger scale and height than these 3- to 5-storey properties. The proposal would introduce a facing building into the streetscape, set behind the retained trees, to complete the Walworth Road frontage alongside Plots H2 and H3. The colours of its façade fins have taken cues from the bricks. The proposal is considered to preserve the setting of these historic buildings on the opposite side of the road. The Elephant and Castle train station and viaduct is a recognised landmark in the area. In recent years this viaduct has been integrated into the Low Line, and includes commercial uses that contribute to the vitality of the area. The proposal would enhance this undesignated heritage asset, by developing the facing prominent site, widen the eastern footway of Elephant Road and provide complementary commercial uses.
245. Historic England had no comment on the application. The GLA Stage 1 response requested further information on the impact on the LVMF view and World Heritage Site, which was provided in the revised TVBHA. In conclusion, the proposal is considered to cause no harm to designated and non-designated heritage assets, nor to the Outstanding Universal Value of the World Heritage Site. The proposal complies with Southwark Plan policies P19, P20, P22, and tall building policy P17 part 3, subsection 2 as well as London Plan policy D9 part C.1)d) and C.1)e) regarding heritage impacts and World Heritage Sites.

Landscaping, trees and urban greening

246. The mature trees on the Walworth Road frontage are required to be retained by the OPP. The submitted arboricultural method statement sets out how most of these mature trees are to be retained with the exception of a pear tree (category

C) to be removed, and one Norway maple (category C) that may be removed and replaced if its condition deteriorates.

247. The council's urban forester considers that the loss of the two lower-quality trees is more than compensated by proposed permanent soft landscaping, which includes 18 new trees on the Walworth Road, Elephant Road, northern side and eastern end of Deacon Street. This is of design merit complementing the retained avenue on Walworth Road, the new adjacent streetscene planting and connections to Elephant Park. The retained trees would be added to with perennial planting beneath, as has been done on the Walworth Road frontage alongside Plots H2 and H3 further south, and so would continue this landscaping character.



Proposed landscape layout

248. The existing temporary landscaping along the northern side of Deacon Street would be removed. The proposed public realm around the building has an area of 0.17ha, plus further areas within the covered colonnade and spill out spaces, and the reprovided Deacon Street and improved public highway pavements that are within the red line, a total of 0.39 hectares of public realm is within the proposed layout.
249. The eastern side of the plot referred to as a "Park Plaza" would be primarily hard surfacing beneath the colonnade and beyond the application site across to the new park pavilion. The applicant states this area of hard surfacing is needed to allow maintenance cranes to reach the façade, a separate route for a fire vehicle

(to prevent the chance of a parked maintenance crane blocking the route of a fire vehicle), and providing the cycling and pedestrian routes that converge in this area, which prevent further soft landscaping. While tables, chairs and moveable plant pots are indicated on the drawings, these would not be permanent nor fixed. It would leave this part of the site (especially as it sits alongside the broad area of surfacing around the pavilion) with less greenery than used in other areas of public realm of Elephant Park. In the design revisions, the applicant has enlarged the one planter on this side of the application site boundary by 10sqm (to a total size of 33sqm, of which 9sqm is within the Plot H1 site), and suggests that the plaza be treated in different materials to delineate the cycle route through, the emergency vehicle route, and spill out space alongside H1. While this would provide less soft landscaping than other parts of the proposal, the overall landscaping is good, particularly when seen as one part of the wider Plot H1 proposal, alongside the central public park and within the overall Elephant Park masterplan. A condition to require further details of the seven moveable planters the applicant has proposed around the south-eastern corner of the building would secure their retention and is included in the recommendation.

250. The pavement on Elephant Road would be at least 2.4m wide, beyond the colonnade and alongside new planters, and the scheme would provide an additional pavement set between the retained trees and façade of the building on the Walworth Road frontage (in addition to the existing pavement alongside the roadway). The route around the northern side would be wider, with at least 4.2m clear route between the planted areas to allow for emergency vehicles. The Deacon Street pavement would be at least 2m wide. These routes around the site and widened pavements would assist in accommodating the additional people coming and going from the site.
251. The planted roof terraces across the building, and the planting climbing up the columns around the base of the proposed building would provide further greenery, and conditions of the planting and maintenance of these features are proposed. The landscaping and planting measures on the building and surrounding public realm give the proposal an Urban Greening Factor of 0.35, which exceeds the London Plan policy G5 target score of 0.3 for a predominantly commercial development.
252. A condition to require the works to be carried out in accordance with the submitted arboricultural method statement is proposed. Further details of the proposed planting (including how it relates to the wider Heygate Estate tree strategy, and achieving the urban greening factor), the landscaping and roof terrace planting, where climbing plants are intended as a defining feature of the proposed elevations, would be required by suggested conditions. Public access to the new areas of public realm (including the colonnade) would be secured through a planning obligation, and an estate management plan to continue the OPP obligation. Subject to these conditions, the proposal would comply with the landscaping element of Southwark Plan policy P17 "Tall buildings", P59 "Green infrastructure" and P61 "Trees".

Ecology and biodiversity

253. The council's ecologist has reviewed the ecological survey and bat survey provided and considers them to be acceptable, without further surveys being

necessary. The mature trees on Walworth Road are mainly to be retained (one would be removed and potentially a second), and the wildflower planting along Deacon Street was always intended to be a temporary landscaping measure. The rest of the cleared site is of limited ecological interest, taken up by the urban farm containers and construction offices.

254. A green roof is proposed around the edge of the plant enclosures, as well as planting to the series of terraces up the building and climbing plants to the columns at the base of the building. Further tree planting is proposed within the public realm, resiting those on Deacon Street and adding more trees. These would provide good green infrastructure within the proposal.
255. Conditions are proposed to require an ecological management plan, further details of the biodiverse roof, and at least 18 swift bricks to be installed to provide suitable biodiversity enhancements, in line with policies G1 “Green infrastructure”, G5 “Urban greening” and G6 “Biodiversity and access to nature” of the London Plan, P60 “Biodiversity” of the Southwark Plan, and to take account of conditions on the OPP.

Archaeology

256. The site is not within an archaeological priority area, however it is of a size where assessment is advised. A desk-based assessment was submitted which considered the work previously carried out on the site and in the Elephant Park masterplan.
257. Earlier development and redevelopment of the site will have removed or damaged any archaeological remains. It considers there to be a low potential for prehistoric, Roman, early medieval and medieval finds or features, and that no further archaeological works or assessment are recommended. The two level basement proposed under Plot H1 would remove the late post-medieval demolition layers of negligible heritage value.
258. The archaeological officer has no objection to the proposal and no new conditions or obligations are proposed in this regard. A condition from the outline planning permission for reporting across the whole Elephant Park redevelopment site would be copied onto a new permission, to cover the scenario where Plot H1 is the final plot to be completed. The proposal complies with Southwark Plan policy P23 “Archaeology”.

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

259. Policy P56 “Protection of amenity” of the Southwark Plan states that development will not be permitted where it causes an unacceptable loss of amenity to present or future occupiers or users, taking into account the impacts on privacy, outlook, sense of enclosure, odour, lighting, daylight, sunlight and microclimate.
260. Many of the objections received referred to the height, massing and location of the proposal causing a loss of privacy, outlook, daylight and sunlight, as well as light pollution and noise.

Outlook and privacy

261. The Residential Design Standards SPD suggests that to prevent unnecessary problems of overlooking, loss of privacy and disturbance, development should achieve a minimum 12m separation at the front of the building and any elevation that fronts onto a highway, and a minimum distance of 21m at the rear of the building.
262. The siting of the proposed building within the site enables these distances to be achieved across the surrounding roads and park:
- Across Deacon Street, the proposed windows would be between 18m to 21m from the facing windows of Plot H2.
 - Across Walworth Road, the windows would be at least 27m from the facing windows on the western side of Walworth Road and 50m from Strata further west.
 - There are no existing residential properties on the western side of Elephant Road, and the upper façade would be 15m from the commercial units in the arches. In the future scenario the proposal would be approximately 40m from the nearest approved residential tower in the Shopping Centre redevelopment.
 - On the northern side of the plot, the proposed windows would be more than 60m from the facing windows of Mawes House, Tantallon House and Plot H4 on the opposite side of Castle Square and the park.
 - To the south-east across Sayer Street, the proposed windows would be 26m from the flats in the future tower of Plot H7.
263. By exceeding the minimum separation distances sought by the Residential Design Standards SPD, the proposal would not cause a significant loss of privacy to surrounding residential properties from the proposed office windows. The proposed terraces are at the same or similar distances as the windows and would not cause a significant loss of privacy.
264. The plot has single storey buildings on it at present, so that surrounding properties are not overlooked from the plot, and they have unrestricted outlook. The proposed building would significantly change the view from properties that face onto the site with its existing low, single storey buildings, especially Plot H2 as the closest neighbour. The planning system does not protect views from private properties, but seeks to protect the overall outlook of a property to prevent it feeling enclosed.
265. With the separation distances of 27m to more than 60m across Walworth Road, Castle Square and the park, the proposal is considered not to cause a significant reduction in outlook nor cause a significant sense of enclosure to residential properties in these directions.
266. The massing of the 18-storey building steps down on the south-eastern and south-western sides to be lower at the corners close to some of the Plot H2 flats, and its tallest massing is stepped set away from the Deacon Street frontage. The separation distance across Deacon Street to the flats within the H2 tower is considered sufficient to prevent an intrusive form of development, and exceeds

the minimum 15m separation required by the OPP's approved parameters. The Plot H2 flats within the lower mansion block at the corner of Deacon Street and Sayer Street would be 17.4m to 19m from the facing façade of the proposal. The proposed building would be 19 to 21m from the facing façade of the Plot H2 tower. These distances, along with the terraces stepping back the massing of the proposal at the corner would prevent the proposal from having an overbearing impact to these flats.

267. The proposed building would sit away from the corner of the future Plot H7 tower, so that the northern and western windows of the tower would retain good outlook.

Daylight

268. The assessment of daylight effects was included within the ES topic of "Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution". The daylight tests used are based on the Building Research Establishment's (BRE) guidance on daylight and sunlight, and compare the future baseline scenario with the proposed scheme. This assessment was not updated with the proposal's amended design as the maximum height of the massing did not increase and the overall façade line is no closer to neighbouring properties.

269. Two comparison tests for information were included elsewhere in the application documents to show the proposal's impact compared with the maximum parameters scheme. The applicant's daylight assessments include three scenarios:

- 1) The future baseline compared with the future baseline plus the Plot H1 proposal (as tested within the ES).
- 2) A comparison of the Plot H1 proposal with the impact of the maximum OPP parameters on neighbouring properties (in the Planning Statement).
- 3) For plots within the Elephant Park masterplan a comparison of the Plot H1 proposal with the impact of the illustrative masterplan of the OPP (in the Planning Statement).

270. The assessed properties include:

- 82, 84, 88, 92, 94-96 Walworth Road
- Julian Markham House
- Mawes House
- Portchester House
- Tantallon House
- Strata
- Plot H2 within the masterplan and occupied
- Plot H4 within the masterplan and occupied
- Plot H7 within the masterplan (under construction)
- The future residential properties in the closest tower of the Shopping Centre redevelopment.

271. The BRE guidance sets out the rationale for testing the daylight impacts of new development through various tests. While the BRE guidance has been recently updated in June 2022, the assessments for the impacts on neighbouring properties remain the same as the earlier BRE guidance. The first is the Vertical

Sky Component test (VSC); this considers the potential for daylight by calculating the angle of vertical sky at the centre of each of window 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 has determined that the existing VSC daylight figure can be reduced by 20% of the original value before the loss is noticeable.

272. The second method that can be used is the No Sky Line (NSL) test 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 more than 20% in the existing area of sky visibility, daylight distribution within a room may be affected.
273. The test results of the future baseline compared with the Plot H1 plus the future baseline will be summarised for the surrounding properties affected by the proposal. Commentary will be given in some cases on a comparison of the proposal with the hypothetical maximum parameters of the OPP, and the illustrative masterplan from the OPP for the affected Elephant Park properties.

82, 84, 88, 92, 94-96 Walworth Road

274. These properties on the western side of Walworth Road face across the highway to Plot H1. They include residential flats above ground floor commercial units (not included in the daylight testing). The windows in these residential properties have existing good VSC levels of between 18 and 27%, and the rooms currently have high levels of daylight distribution to their rooms. The daylight testing does not model the impacts of the mature trees on Walworth Road.

Future baseline v proposed – VSC

Address	Number of windows tested	Windows that pass	Windows that fail 20-29.9%	Windows that fail 30-39.9%	Windows that fail 40%+
82 Walworth Road	10	0	0	0	10
84 Walworth Road	10	0	0	0	10
88 Walworth Road	12	0	0	0	12
92 Walworth Road	7	0	0	0	7
94-96 Walworth Road	19	4	1	4	10

Future baseline v proposed – NSL

Address	Number of rooms tested	Rooms that pass	Rooms that fail 20-29.9%	Rooms that fail 30-39.9%	Rooms that fail 40%+
82 Walworth Road	4	2	0	0	2
84 Walworth Road	6	0	0	0	6
88 Walworth Road	7	5	2	0	0
92 Walworth Road	3	2	0	0	1
94-96 Walworth	15	10	1	4	0

Road					
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275. All windows in this terrace that face towards the site would experience noticeable reductions in VSC, up to 68% loss of current levels: the four windows that pass the VSC test at nos. 94-96 are side windows facing away from the site. The retained VSC absolute values would be between 7.6 to 13.7, which are low. The resulting retained VSC levels are lower than, but broadly similar to those that a hypothetical scheme of the OPP maximum parameter massing, for example retained VSCs of 7.9, 9.1 and 11.3%, compared with levels of 9.8, 10.0 and 12.7% of the OPP maximum massing.
276. Most rooms would experience a noticeable reduction in NSL, also in a similar scale to the hypothetical scheme of the OPP maximum parameter massing. Of the 35 rooms tested, 33 would retain daylight distribution to at least half of the room.
277. These impacts are considered in the ES to be direct, long-term, local and of major adverse significance. The daylight to the windows at the rear of this terrace (except for no. 82) would not be affected by the proposal. In a cumulative scenario with the approved Shopping Centre redevelopment, VSC levels to some windows would be slightly lower but there would be no change in the number of rooms and windows that fail the tests. The impact on the amenity of these properties by the reduction in the amount of daylight and distribution of daylight needs to be considered in the overall planning balance of the proposal.

Julian Markham House

278. This property on the western side of Walworth Road and to the south of the application site provides student accommodation. The tables below summarise the impacts on daylight levels at the centre of the tested windows and the daylight distribution to the rooms.

Future baseline v proposed – VSC

Address	Number of windows tested	Windows that pass	Windows that fail 20-29.9%	Windows that fail 30-39.9%	Windows that fail 40%+
Julian Markham House	146	129	17	0	0

Future baseline v proposed – NSL

Address	Number of rooms tested	Rooms that pass	Rooms that fail 20-29.9%	Rooms that fail 30-39.9%	Rooms that fail 40%+
Julian Markham House	127	127	0	0	0

279. Seventeen windows at the closest corner of property to Ploy H1 would experience a noticeable reduction in VSC levels by 20.1 to 27.7% of the existing levels (above the 20% reduction where such a change is likely to be noticeable), however all rooms would retain good levels of daylight distribution. The effect on

this property is considered in the ES to be direct, long term, local and of minor significance. In a cumulative scenario with the approved Shopping Centre redevelopment in place, 17 more windows would fail the VSC test and two rooms would fail the NSL test.

280. The reduction in VSC value to some windows of this student housing building is considered not to cause a significant reduction in the overall quality of the accommodation.

Mawes House

281. The tested windows and rooms within the southern flank of this residential building face across Castle Square onto Plot H1. The south-facing windows currently benefit from good levels of VSC (over 30% to the upper floors) and NSL, and the units benefit from side windows on the eastern and western elevations. The tables below summarise the test results:

Future baseline v proposed – VSC

Address	Number of windows tested	Windows that pass	Windows that fail 20-29.9%	Windows that fail 30-39.9%	Windows that fail 40%+
Mawes House	256	210	26	8	12

Future baseline v proposed – NSL

Address	Number of rooms tested	Rooms that pass	Rooms that fail 20-29.9%	Rooms that fail 30-39.9%	Rooms that fail 40%+
Mawes House	208	192	8	5	3

282. The windows that would see the largest reduction in VSC values sit within a central recess on each floor of the tower and appear to serve bathrooms, which are not habitable rooms. The bedroom windows on each floor would retain good VSC values of over 20%; while they would experience a noticeable reduction in NSL the daylight distribution would remain to at least half of the room areas.
283. The remaining windows that would experience a noticeable reduction in VSC serve kitchens and are set below the projecting balcony of the flat above. The retained VSC of these kitchens is at least 15% which when considered with the retained daylight to the other rooms in each flat is considered not to lead to a significant reduction in the quality of these residential units. The ES considered the effects to be direct, long term, local and of minor to moderate adverse significance.
284. The impact of the submitted Plot H1 scheme is similar to the impact of the OPP maximum parameters scheme; the submitted scheme leads to further reductions in absolute VSC values of 1-1.8% for the southern flank windows. In the cumulative scenario with the Shopping Centre redevelopment, nine more windows would fail the VSC test and the number of rooms passing the NSL test

remains the same. The proposal is considered not to cause significant harm to the quality of these residential units.

Portchester House

285. Portchester House provides student accommodation in a tower fronting New Kent Road and shares a podium with adjoining Mawes House and Tantallon House. Due to the arrangement of these three buildings, daylight levels to the lower levels of the rear of Portchester House are low in the existing situation. The test results are summarised below:

Future baseline v proposed – VSC

Address	Number of windows tested	Windows that pass	Windows that fail 20-29.9%	Windows that fail 30-39.9%	Windows that fail 40%+
Portchester House	161	157	3	1	0

Future baseline v proposed – NSL

Address	Number of rooms tested	Rooms that pass	Rooms that fail 20-29.9%	Rooms that fail 30-39.9%	Rooms that fail 40%+
Portchester House	140	111	14	8	7

286. The four windows that would experience a noticeable reduction in VSC have low baseline VSCs values of 3.8 to 4.4% so that the absolute reduction in value of 1 to 1.2% is a high proportional change. The absolute change in VSC would not materially change the amenity of these student bedrooms. The reduction in daylight distribution to the 23 student bedrooms and 6 communal rooms is considered not to cause a material reduction in the quality of the accommodation. The ES considers the effect to be direct, long term, local and of minor adverse significance.
287. It is noted that the proposed massing of Plot H1 causes almost the same VSC impacts as a maximum OPP parameter scheme, to be within 0.2% absolute change in VSC values, but has more NSL impact than a maximum parameter scheme causing up to a further 11% absolute change in room area. The number of windows and rooms passing the VSC and NSL tests remains the same in the cumulative scenario with the Shopping Centre redevelopment. The proposal is considered not to cause significant harm to the quality of this student housing.

Tantallon House

288. Tantallon House is a residential building, with its southern flank facing over Castle Square to Plot H1.

Future baseline v proposed – VSC

Address	Number of windows tested	Windows that pass	Windows that fail 20-29.9%	Windows that fail 30-39.9%	Windows that fail 40%+
Tantallon House	115	74	23	17	1

Future baseline v proposed – NSL

Address	Number of rooms tested	Rooms that pass	Rooms that fail 20-29.9%	Rooms that fail 30-39.9%	Rooms that fail 40%+
Tantallon House	115	110	5	0	0

289. The windows that would experience a noticeable reduction in VSC are on levels 1 to 9, and each is recessed within the wide balcony for that flat (with five floor to ceiling glass panes forming one “window” for the VSC test) or between the two projecting balcony columns. The absolute reduction in VSC values is between 3.0% and 5.0%, which reduces the retained VSC values to between the low- and mid-teens. The rooms retain good daylight distribution however in the NSL tests which take account of the size of the windows serving each room.
290. Five rooms (each a bedroom) would see a noticeable NSL reduction in daylight distribution, but retain daylight to at least 71% of their areas which would be a good distribution.
291. The ES considers the impact on Tantallon House as a whole to be direct, long term, local and of minor adverse significance. The impacts are comparable to the OPP maximum parameters scheme, causing a further 0.3-0.8% absolute change in VSC which is unlikely to be a noticeable additional impact. In the cumulative scenario with the approved Shopping Centre development, 7 more windows would fail the VSC test and the number of NSL passes remain unchanged. The reduction in daylight to the Tantallon House properties is considered not to cause a significant reduction in their residential amenity.

Strata

292. The residential floors of Strata from levels 2 to 18 that face towards the site were tested. At the upper levels, the proposal was found to cause small reductions in VSC and NSL, so that higher levels further up the tower would pass these tests. The windows currently have high VSC values of 26.5 to 35.8% and high NSL values due to the large windows and relatively low rise context of this building.

Future baseline v proposed – VSC

Address	Number of windows tested	Windows that pass	Windows that fail 20-29.9%	Windows that fail 30-39.9%	Windows that fail 40%+
Strata	136	40	56	40	0

Future baseline v proposed – NSL

Address	Number of rooms tested	Rooms that pass	Rooms that fail 20-29.9%	Rooms that fail 30-39.9%	Rooms that fail 40%+
Strata	136	124	12	0	0

293. 96 windows would experience a noticeable reduction in VSC values, however the retained VSC values remain good: 69 windows retain an absolute value over 20.0% (including all windows on level 7 upwards), 11 retain an absolute value of 19 to 20%, and 11 have values between 18 and 19%. The remaining five windows on levels 2 and 3 would have VSC values between 16.8 to 17.5% which is considered a reasonable level of daylight at lower levels within an urban environment. The majority of rooms pass the NSL test, with generally one room per floor failing, yet still retaining daylight to at least half the room area. The ES considers the effect to be direct, long term, local and of minor adverse significance.
294. The massing of the submitted Plot H1 scheme causes more VSC reduction than the OPP maximum parameters scheme for this plot, with the absolute VSC change 1.8 to 3.6% higher than the hypothetical OPP comparison. The NSL comparisons are more mixed, with some rooms affected more than the maximum parameters (up to 14% room area lost), while some rooms at the lower levels are impacted less (4-30% room area remaining lit).
295. In a cumulative scenario with the Shopping Centre redevelopment in place, five more windows would fail the VSC test, and the same number of NSL test passes occur. These five windows are on levels 13 to 15, and have retained VSC values of 24.8 to 26.3% which are good daylight levels. Windows on each floor would see slightly lower VSC levels: all tested windows on level 7 and higher retain VSC values over 20%, and all tested windows retain VSC values of 16.6% and higher.
296. The reduction in daylight to the Strata tower windows and rooms from Plot H1 and in the cumulative scenario is considered not to cause harm to the overall amenity of these residential properties.

Plot H2

297. Plot H2 is the closest neighbouring property to the proposal, facing across Deacon Street and contains occupied residential units from the first floor upwards. The windows face over to Plot H1 as an undeveloped site currently, meaning the proposed massing would be a substantial change to the context, although one that was anticipated in the OPP which approved Plot H1 to come forward for development. The ES considers the daylight impacts to Plot H2 properties to be direct, long-term, and of major adverse significance to this plot.

Future baseline v proposed – VSC

Address	Number of windows tested	Windows that pass	Windows that fail 20-29.9%	Windows that fail 30-39.9%	Windows that fail 40%+
Plot H2	657	380	40	65	172

Future baseline v proposed – NSL

Address	Number of rooms tested	Rooms that pass	Rooms that fail 20-29.9%	Rooms that fail 30-39.9%	Rooms that fail 40%+
Plot H2	327	268	8	8	43

298. 380 of the tested windows pass the VSC test and so the impact on these windows is considered to be insignificant in ES terms. It is noted that 131 of the 277 VSC-affected windows are located within a recessed balcony, which limits the daylight reaching the centre of these windows. 59 rooms would have a noticeable reduction in daylight distribution. The affected VSC windows often serve rooms that also fail the NSL tests within the Sayer Street mansion block and tower particularly, which will be looked at in more detail below.
299. As a recently constructed plot within the Elephant Park masterplan, the applicant was able to assess the impacts on the average daylight factor (ADF) of these occupied units, in the future baseline and with the Plot H1 proposal in place as a further test. Although the ADF test no longer appears in the recently updated BRE guidance for assessing the daylight provision to new residential accommodation, it is useful comparison as this metric was used when considering the quality of proposed accommodation in the respective RMAs for the surrounding plots. The ADF test showed 245 of the 327 tested rooms either meet the BRE guidance for their room uses or see no change in their ADF levels. Officers have considered the daylight impacts on the existing Plot H2 flats, and split Plot H2 into its two mansion blocks and tower for the assessment below.

Plot H2 Sayer Street mansion block

300. The Sayer Street mansion block (block AD, known as Weymouth Building) at its northern end contains 84 windows that would experience a noticeable reduction in VSC, 12 rooms served by these windows would also experience a noticeable reduction in NSL. This block was designed with a future development on Plot H1 in mind, so the design incorporates dual aspect flats, corner locations for the combined living/kitchen/diners (LKDs), and tall windows to try to maximise daylight provision to these flats.
301. Compared with the impact of the illustrative OPP masterplan massing, the current proposal causes greater daylight loss to the windows of between 0.1 and 3.7% VSC absolute value for the first floor flats, a further loss of 4.2% absolute value for the second floor flats, continuing up the façade of this mansion block and up to a further 9% absolute value change to the top floor.
302. Compared with the effect of the maximum OPP scenario, the current proposal has a mixture of less impact to some windows and greater impact to others. Six

windows per floor from first to sixth floors would have better daylight levels in the submitted scheme; the windows would see higher VSC values between 0.1 to 3.7% better than the maximum OPP scenario. Another seven windows on the first floor lose an extra 0.2 to 0.6% absolute value to have lower daylight than the maximum OPP scenario, 12 on the second floor lose an extra 0.1 to 0.8% absolute value, 12 windows on the third floor etc up the façade.

303. The affected flats are dual aspect so that while windows and rooms on the northern façade are most affected by the proposal, the daylight levels on the western and eastern façades are less affected. To take each affected flat in turn:

- The two first floor flats would experience noticeable reductions to both their north and side facing windows:
 - One flat would see the ADF of its corner LKD reduce from 2.2 to 1.6% with the proposal, and its two bedrooms would see a noticeable reduction in VSC and NSL but the ADFs of 0.9% and 0.8% remain just below the recommended ADF of 1%. These ADFs to the three rooms are better than the maximum OPP scenario (of 1.5%, 0.6% and 0.5% respectively).
 - The other first floor flat would have a noticeable reduction in VSC and NSL to its bedroom which would retain an ADF of 0.9%, and the corner LKD would see a noticeable reduction in VSC and NSL, but retain daylight distribution to 79% of the room area and an ADF of 1.4%. These ADFs are slightly better than in the maximum OPP scenario where they would be 0.6% and 1.3% respectively.
- At second floor level, one flat would have its corner LKD reduce in ADF from 2.2% to 1.6%, and its two bedrooms would have noticeable reductions in VSC and NSL but retained ADFs of 0.8% and 0.9%, close to the 1% recommended. The second flat would have reduced VSC and NSL to its bedroom but an ADF of 0.9%, and while the LKD's windows would have reduced VSC values the room retains an ADF of 1.4%.
- At third and fourth floors the second floor pattern of daylight impacts repeats, with the ADFs increasing up the building so the bedrooms achieve ADFs of between 0.9 and 1.3%, and the LKDs have ADFs of 1.5 to 1.8%.
- At the fifth floor and above there would be windows that experience a noticeable reduction in VSC but the rooms retain good daylight distribution and ADF values.

304. The flats in this mansion block would experience some harm to their residential quality by the reduction in daylight. It is noted that the daylight levels are better than in the maximum OPP scenario for the flats closest to Plot H1 as the proposal's corner has been sculpted in front of this block, however other flats further away have greater losses than a maximum OPP scenario but still retain acceptable ADFs. When compared with the potential impacts of the approved OPP parameters, the loss of daylight is not considered to be a reason for the refusal of the scheme, however the harm to these neighbours would need to be weighed in the planning balance.

Plot H2 tower

305. The 31-storey tower of Plot H2 (block C, known as Hurlock Heights) contains 185 windows on the northern side and north-eastern corners on levels 1 to 21 that would have a noticeable reduction in VSC. The tower contains 40 rooms from levels 1 to 19 that would experience a noticeable reduction in NSL; 38 of these rooms are served by windows that would also experience a noticeable VSC reduction. The tower was designed with a future development of Plot H1 to the north in mind, so the design incorporates dual aspect flats, corner locations for the combined LKDs (albeit recessed to provide a balcony), and tall windows to try to optimise daylight provision to these flats.
306. Compared with the impact of the illustrative OPP masterplan massing, the current proposal causes greater daylight loss to the windows of between 0.3 and 6.1% VSC absolute value for the first floor flats, a further reduction of 7.4% absolute value for the second floor flats, continuing up the façade of tower and causing a further loss of up to 13% absolute value change.
307. Compared with the effect of the maximum OPP scenario, the current proposal has a mixture of less impact to some windows (particularly the lower floors) and greater impact to others (mostly to the upper floors). For example, 11 first floor windows would see VSC absolute values between 0.2 and 1.7% higher than the maximum OPP scenario, while two windows would have VSC values 0.6 and 0.8% lower.
308. The most affected flats in the tower are dual aspect with windows in the northern façade and either the north-eastern or north-western sides of the tower. The windows and rooms in the northern façade are most affected by the proposal as they face straight onto Plot H1; the daylight levels on the side façades are generally less affected. Other affected flats are set back and primarily face either east or west, with some north-facing windows. The regular design of the tower means the impacts to two flats per floor in the northern side would experience noticeable VSC reductions and some with NSL reductions too up to and ADF reductions, up to the 21st floor. The impacts per floor are summarised as follows.
- Two first floor flats in the northern façade of the tower would experience noticeable reductions to their north facing windows and side windows:
 - One flat would have a noticeable reduction in VSC to all of its windows, and a noticeable reduction in NSL to its LKD and one of its two bedrooms. The ADFs would reduce from 0.5%, 3.1% and 2.5% to 0.4%, 0.9% and 0.6% respectively; these ADFs are the same as in the maximum OPP scenario.
 - One flat would have a noticeable reduction in VSC to four of its five windows, and a noticeable reduction in NSL to the bedroom. The ADF of its corner LKD would reduce from 3.3% to 1.6% with the proposal, and the bedroom ADF was reduce from 2.5% to 0.7%. The ADF to the LKD is better than the maximum OPP scenario (of 1.3%) and the same for the bedroom.
 - At second floor level, the same pattern occurs as on the first floor. One flat would have a noticeable reduction in VSC to all its windows, and to

the NSL to its LKD and one of its two bedrooms. The ADFs would reduce from 0.5%, 3.2% and 2.6% to become 0.4%, 1.0% and 0.7% respectively, which are the same as for the maximum OPP scenario. The other flat would have a noticeable reduction in VSC to three of its five windows, and a noticeable reduction in NSL to the bedroom. The ADF of its corner LKD would reduce from 3.4% to 1.6% with the proposal, and the bedroom ADF was reduce from 2.6 to 0.7%. The ADFs to the LKD is better than the maximum OPP scenario (of 1.4%) and the same for the bedroom.

- At third floor level the pattern of fails slightly improves as one flat would see its LKD pass the NSL test although all windows fail the VSC test. The other flat retains ADFs of 1.8% for the LKD and 0.8% for the bedroom.
- From the fourth floor the pattern continues up to the 21st floor where, for one flat per floor, the three windows serving the LKD would see a noticeable reduction in VSC but pass the NSL test, and one of the two bedrooms would have a noticeable reduction in VSC and NSL. The other flat on each floor would have a noticeable reduction in VSC to three of its five windows, and a noticeable reduction in NSL to the bedroom. The ADFs would improve up the building.

309. Away from the northern façade of the tower, the east-facing flat affected on each floor would see a noticeable reduction in VSC to the recessed north-facing window of the LKD and the second window serving the LKD would see a small reduction in VSC (but passes the VSC test). The VSC impact of the proposal to these flats is less than in the maximum OPP scenario. The LKD rooms pass the NSL test on each floor. The ADFs of these LKDs would reduce from 1.6% on the second floor to 1.2%, at third floor from 1.7% to 1.3%, up to the 8th floor where the recommended ADF of 2% would be achieved, and are similar in scale to the maximum OPP scenario. These same flats would have a noticeable reduction in the daylight to the recessed bedroom windows; these windows have very low VSC values of 1.5 to 6.2%, making any VSC reduction a high proportion. The reduction in VSC values of 1.3 to 1.5% to the bedrooms, and the daylight reduction to the LKDs is considered to not cause harm to the amenity of these flats.
310. On the other side of the tower, the west-facing flat to each floor would see a noticeable reduction in VSC to the north-facing window of the LKD, but as the VSC to the other window serving this room would not be impacted and the NSL to the room is unaffected, the daylight to these flats would not change significantly. The proposal would cause a noticeable reduction in daylight to flats in the Plot H2 tower. When compared with the potential impacts of the approved OPP parameters on the Plot H2 tower, the loss of daylight is not considered to be a reason for the refusal of the scheme, however the harm to these neighbouring units must be weighed in the planning balance.

Plot H2 south-western mansion block

311. Approximately 60m from Plot H1, the south-western block of Plot H2 (block B, known as Sandow House) has 8 windows with a noticeable reduction in VSC, each window is one of four serving a LKD in a flat on each floor. 7 rooms would experience a noticeable reduction in NSL, but 6 of the 7 rooms would retain daylight distribution to at least half the room. The impact on the daylight of these flats would not harm their overall quality.

312. In conclusion for the impacts on Plot H2, the reduction in daylight levels to the flats in Plot H2 are broadly in line with those that would occur with a hypothetical development of the maximum OPP scenario, in some locations are less than the maximum scenario and in other cases are greater. The design of Plot H2 planned for a development on Plot H1 and sought to maximise the dual aspect nature of the flats, with large windows and multiple windows serving LKDs. The harms to the occupied flats in the Sayer Street mansion block and the Plot H2 tower need to be considered in the planning balance of this application.

Plot H4

313. Plot H4 is to the north-east of the application site, facing over the public park towards the clear application site and Plot H7 under construction.

Future baseline v proposed – VSC

Address	Number of windows tested	Windows that pass	Windows that fail 20-29.9%	Windows that fail 30-39.9%	Windows that fail 40%+
Plot H4	300	184	64	37	15

Future baseline v proposed – NSL

Address	Number of rooms tested	Rooms that pass	Rooms that fail 20-29.9%	Rooms that fail 30-39.9%	Rooms that fail 40%+
Plot H4	258	232	22	4	0

314. Of the 116 windows that fail the VSC test, 89 are beneath the projecting balcony of the floor above meaning Plot H4's design results in Plot H1 having a disproportionate impact. The affected windows that are not beneath a balcony have higher retained VSCs of 13.3 to 20.1%. The Plot H4 flats at first floor level would have retained VSC values of between 5.7 and 19.4%, reduced from future baseline values of 9.0 to 23.0% respectively. The 26 rooms that would experience a noticeable reduction in NSL retain daylight distribution to at least half the room area. The ES considers the daylight effects to be direct, long-term and of minor adverse significance to this plot.
315. When compared with the impacts from the illustrative OPP masterplan massing, the current Plot H1 proposal has broadly similar impacts and causes a further reduction in VSC value of up to 3.9%. A comparison with the OPP maximum parameter massing shows a mix of result of windows that would see a very slight improvement in VSC with the current proposal (up to 0.2% improvement in value) and more windows that would see a greater reduction in VSC (as much as a further 2.3% reduction in value) due to the increased height and massing of the current proposal.
316. In the ADF test to these recently completed flats, 223 of the 258 rooms either meet the BRE guidance for that room type or see no change to their ADF levels. The ADF impacts to the Plot H4 rooms from the current proposal are generally the same or a greater reduction (up to 0.3% ADF) than the impact from the

maximum OPP parameter, and cause up to a further 0.5% ADF reduction compared with the illustrative OPP masterplan.

317. The daylight impacts on VSC and ADF to these properties are generally greater than in the OPP, leaving low retained VSC and ADF values especially to the lower level flats. The retained NSL values are good. The reduction in daylight would be noticeable to these properties, and slightly reduce the quality of these new units. Their internal size, outlook and private amenity space provision would remain good however, so while the proposal would cause harm to daylight levels it would not cause such harm to warrant refusal of this application.

Plot H7

318. Plot H7 is under construction and the windows and layouts of the approved flats are known, allowing the daylight tests to be undertaken, including the ADF tests.

Future baseline v proposed – VSC

Address	Number of windows tested	Windows that pass	Windows that fail 20-29.9%	Windows that fail 30-39.9%	Windows that fail 40%+
Plot H7	707	594	30	28	55

Future baseline v proposed – NSL

Address	Number of rooms tested	Rooms that pass	Rooms that fail 20-29.9%	Rooms that fail 30-39.9%	Rooms that fail 40%+
Plot H7	458	412	10	9	27

319. The affected windows are in the tower of Plot H7 and the adjacent mansion block on Sayer Street, which were anticipated to have low daylight levels in the recent RMA for this plot. Of the 113 windows that fail the VSC test, 83 are set below a balcony on the floor above which limits the visibility of the sky. 46 rooms (33 bedrooms and 13 LKRs) would see a noticeable reduction in daylight distribution, including three bedrooms at first and second floor levels would see their very low NSL results reduce to zero. The ADF test found that 414 of the 458 rooms either meet the BRE guidance for that room use or see no change in ADF value. The ES consider the daylight effects to be direct, long-term and of moderate adverse significance.
320. The Plot H7 flats would experience daylight losses from any substantial redevelopment of Plot H1, and the Plot H7 sought to optimise daylight provision by having dual aspect rooms and flats, and included floor-to-ceiling windows. The impacts of the current Plot H1 proposal on the Plot H7 flats are the same or greater than the VSL and NSL impacts from the illustrative masterplan and maximum OPP parameters schemes.
321. The reduction in daylight to these future homes would slightly reduce the quality of these new units. Their internal size, outlook, private amenity space provision and communal spaces would remain good however, so while the proposal would cause harm to daylight levels it would not cause such harm to warrant refusal of

this application.

Shopping Centre redevelopment

322. The closed approved new tower in the Shopping Centre redevelopment would be on the western side of the railway viaduct, approximately 40m from the Plot H1 site.

Cumulative scenario of Shopping Centre flats and Plot H1 – VSC

Address	Number of windows tested	Windows that pass	Windows that fail 20-29.9%	Windows that fail 30-39.9%	Windows that fail 40%+
Shopping Centre residential tower	192	97	32	20	43

Cumulative scenario of Shopping Centre flats and Plot H1 - NSL

Address	Number of rooms tested	Rooms that pass	Rooms that fail 20-29.9%	Rooms that fail 30-39.9%	Rooms that fail 40%+
Shopping Centre residential tower	155	106	13	25	11

323. Of the 95 windows that would experience a noticeable reduction in VSC, 64 are set within a recessed balcony. The other windows affected are large floor-to-ceiling windows. The rooms that fail the NSL test retain daylight provision to at least 46% of their areas. The ADF tests to these future homes found that 105 of the 155 rooms assessed would retain daylight levels recommended by the BRE guidance or are unaffected by the Plot H1 proposal. The 50 rooms that would see a reduced ADF are all combined living/kitchen/dining rooms, within recessed balconies.
324. The ES considers the daylight impact on this future building to be of moderate adverse significance. The impacts upon this residential tower that is under construction are not considered to cause such harm to the amenity of these future homes to warrant refusal of this application.

Sunlight

325. The same neighbouring residential properties were tested for the sunlight hours to the windows, where those windows face within 90 degrees of south. A window would fail the sunlight test where all three test criteria are met:
- The window would receive less than 25% of annual probable sunlight hours or 5% of winter hours; and
 - It would experience more than a 20% reduction in current sunlight hours and;
 - The absolute reduction in annual sunlight hours would be more than 4%.
326. The table below sets out the sunlight test results for the annual hours and winter hours. Where a property had no affected windows that face within 90 degrees of

south, e.g. 82-96 Walworth Road, no rooms were tested.

Future baseline v proposed – APSH

Address	Number of windows tested	Windows that pass	Windows that fail winter hours	Windows that fail annual hours
82 Walworth Road	-			
84 Walworth Road	-			
88 Walworth Road	-			
92 Walworth Road	-			
94-96 Walworth Road	2	2	-	-
Julian Markham House	6	6	-	-
Mawes House	208	197	11	11
Portchester House	140	140	-	-
Tantallon House	115	94	2	21
Strata	51	51	-	-
Plot H2	146	146	-	-
Plot H4	225	195	0	30
Plot H7	274	257	0	17

327. Looking at the properties that would experience a noticeable reduction in sunlight hours:

- In Mawes House the 11 rooms that fail annual and winter sunlight hours tests are bathrooms. The loss of sunlight to these non-habitable rooms is considered to be an insignificant effect in ES terms.
- In Tantallon House the 21 rooms that would see a noticeable reduction in annual sunlight hours each have a balcony above the window which obstructs part of the available the sunlight. The retained sunlight levels are considered acceptable for this central urban environment, and 19 of these 21 rooms pass the winter hours test. The loss of sunlight is considered to be of minor adverse significance in the ES.
- In Plot H4, 30 rooms would see a noticeable reduction in annual sunlight hours. These affected rooms are served by windows set below a balcony on the floor above. All rooms would retain good winter sunlight hours. The loss of sunlight to flats in this plot is considered to be of minor adverse significance in the ES.
- In Plot H7, 17 rooms would see a noticeable reduction in annual sunlight hours. 1 is a combined living/kitchen/dining room and 16 are north-facing bedrooms which have low sunlight levels of 5% to 9% APSH provided by one west-facing window, which makes any reduction a high proportionate change. The loss of sunlight is considered to be of minor adverse significance in the ES. The impacts are similar to those the illustrative OPP masterplan would have had on this adjacent plot.

328. In the cumulative scenario with the approved Shopping Centre scheme in place, the proposal's impact on the sunlight to the future flats within the nearest future tower were tested for APSH annual and winter hours. Of the 122 rooms assessed, 81 meet the BRE guidance, and 41 would experience a noticeable

reduction in annual hours, 37 a noticeable reduction in winter hours. The ES considers the impacts to be of moderate adverse significance. These rooms are all LKDs that are set behind their recessed balconies, and face eastwards meaning they are affected by any tall redevelopment on Plot H1 as it would shade morning sun hours. The retained sunlight levels are considered acceptable for these future flats however as the bedrooms retain good sunlight hours across the year and in winter.

329. The reduction in sunlight hours to these neighbouring properties would not be so significant to warrant the redesign or refusal of the current application. It is a harm that cannot be mitigated and so must be considered as part of the planning balance.

Overshadowing of amenity spaces

330. The impact of the proposal's massing on the sunlight reaching three larger outdoor amenity spaces was assessed in the sun hours on ground test, and transient overshadowing diagrams show the shadows cast each hour. The BRE guidance suggests at least half of an amenity space should receive at least two hours of sunlight on 21 March (the spring equinox) to appear adequately sunlight throughout the year. Shading by trees is not modelled in these tests.
331. The massing of the proposal would allow more than half of the new central public park to receive at least two hours of sunlight on 21 March (55%), and at least half of Castle Square (63%). The submitted design would have a similar scale of impact as the maximum massing scenario. In the cumulative scenario, with the Shopping Centre permission in place, these two spaces would retain at least two hours of sunlight to over half of their area. The reduction would not lead to a significant loss of sunlight hours to these areas of public realm.

Amenity space	Future baseline sun levels (% area that receives >2hrs sunlight)	Sun hours on ground test of Plot H1 proposal	Sun hours on ground test of maximum massing scenario	Cumulative Sun hours on ground of Plot H1 proposal
Elephant Park	70%	55%	53%	55%
Castle Square	100%	63%	62%	55%
Mawes/Portchester/Tantallon podium	49%	47%	46%	36%

332. The podium garden of Mawes/Portchester/Tantallon Houses would see a small reduction in sun hours on ground from 49% of its area receiving at least 2hrs of sunlight to 47% of its area; this is slightly less impact than the hypothetical OPP maximum massing's impact (at least 2hrs of sunlight to 46% of its area). The shadow of Plot H1 would extend over the podium garden from around noon until between 2pm and 3pm. The podium garden currently falls slightly short of meeting the half area recommended in the BRE guidance, and a reduction by another 2% is considered not to cause significant harm to the residential amenity. The ES concludes the effect of the proposal in terms of overshadowing is considered to be insignificant.

333. When considered with the impact of the Shopping Centre redevelopment (which overshadows these properties in the afternoon), the podium area receiving at least two hours of sunlight would reduce to 36%. This suggests the approved Shopping Centre redevelopment has a greater impact than Plot H1 by itself. This cumulative effect is considered in the ES to be a direct, long-term, local effect of minor adverse significance, and is a harm that needs to be considered in the planning balance.

Conclusion on daylight and sunlight

334. The impacts on daylight levels to windows and rooms allow some of the neighbouring properties to retain good levels of daylight for an urban area, and are broadly comparable to the impacts of the maximum parameters consented by the OPP. A detailed RMA design could have had similar massing and similar impacts. The reduction in daylight and sunlight to neighbouring properties is considered by officers to be not so severe as to be considered contrary to policy P56 of the Southwark Plan and London Plan policy D9 part C.3)a), nor to warrant refusal of the proposal in neighbour amenity terms; their privacy and outlook would not be significantly reduced due to the separation distances, and the neighbouring properties retain their internal spaces and amenity spaces as other unaffected aspects of residential quality. However, the loss of daylight and sunlight to surrounding properties and plots within the masterplan does need to be factored into the wider planning balance of the proposal, and is addressed in a later topic of this report.

Light pollution

335. The light trespass diagrams within the ES show the light spill from Plot H1 to surrounding properties, assuming all office lights are on throughout the night and with no blinds to the windows, in order to model a worst case scenario. The diagrams show that the increased lux levels to surrounding properties pre-curfew and post-curfew sit below the threshold levels to all properties within Elephant Park, Strata, Walworth Road, the approved Shopping Centre tower and those to the north (Tantallon, Portchester and Mawes Houses). The proposal does not raise light pollution concerns in this central part of the borough, within the CAZ and town centre. It has addressed London Plan policy D9 part C.1)h) on minimising light pollution from tall buildings. A condition to require further details of any external lighting is proposed to protect neighbour amenity.

Solar glare

336. The ES included consideration of the solar glare effects of the proposal. The mainly glazed façades have been considered in terms of how they may cause glare to road users at 13 locations in the local area, and to train drivers at 8 locations on the viaduct to the west of the site. The assessment was updated for the revised elevation design (although not precisely the submitted scheme).
337. Eleven of the 13 road locations would have no effect or an insignificant solar glare effect, as glare would occur for a short period of time, or away from the traffic light focus, or be behind the driver's visor line. One location looking south

down Meadow Road along Ash Avenue would experience solar glare from the east-facing parts of the upper façade (behind the visor line) from 7am to 8am in spring and autumn, as an effect of minor adverse significance. One location on Kennington Lane would also experience solar glare for one hour in the afternoon on the parts of the façade visible behind the Strata tower, leading to an effect the ES categorises as of minor, adverse significance.

338. In terms of the rail locations along the viaduct either side of the train station, four of the 8 assessed locations would have an insignificant effect. The other four locations would have limited incidences of solar glare:
- Two locations for north-bound trains coming into the station where for two hours in the summer afternoons solar glare may occur, leading to an effect of minor adverse significance.
 - Two locations for south-bound trains coming into the station where a small portion of the middle and corner of the façade would pick up reflections before 5am in summer. This is an effect of minor adverse significance.
339. The solar glare analysis assumes the proposal façades are fully reflective as a worst-case scenario, so the actual detailed design with the fins to screen part of the glazing would assist in this regard. These predicted incidences of solar glare are not considered significant to warrant the refusal of the application, and the proposal has sufficiently addressed London Plan policy D9 part C.1)g).

Noise and vibration

340. A condition to control the hours of use of the terraces is proposed, in the interest of protecting neighbour amenity late at night and early in the morning. Another condition would be included relating to plant noise given the amount of roof plant and low level plant within the proposal, also in the interest of neighbour amenity.

Conclusion on neighbour amenity

341. The proposal would not cause a material loss of privacy, nor be intrusive to the outlook of surrounding properties. It would cause a loss of daylight to windows and rooms of neighbouring properties, and in some cases would cause harm to the overall quality of these residential neighbours. The proposal would not cause light pollution nor regular incidences of solar glare, and subject to the proposed conditions would not raise noise or vibration issues. The proposal broadly complies with policy P56 Protection of amenity of the Southwark Plan, however there will be noticeable daylight and sunlight losses to some properties highlighted above, although officers do not consider the degree of harm overall sufficient to warrant refusal. In addition these harms have to be considered in the overall planning balance, which is set out later in this report.

Transport and highways including servicing, car parking and cycle parking

Site layout

342. The site has a PTAL of 6b, the highest level. This development faces Elephant and Castle train station, is close to the tube station, and to the bus routes on the adjacent Walworth Road. The footways adjoining this site on Elephant Road and Walworth Road connect northerly and easterly to the pedestrian routes running through the neighbouring Elephant Park. There are a few highway safety measures on the segment of Walworth Road in the form of raised entry treatment at its junctions with Elephant Road and Hampton Street plus signalised pedestrian crossings on the three arms of its intersection with Heygate Street/Steedman Street. This site adjoins dedicated cycle routes including Cycle Superhighways (nos. 6/7) and there are bus lanes on both sides of the section of Walworth Road flanking this site which cyclists can use, plus an extended loading bay that can accommodate large vehicles on the western side of the adjacent Elephant Road.
343. The application proposes a generous pedestrian environment to complement the footways on Elephant Road and Walworth Road, an east-west pedestrian route at its northern periphery that would join Sayer Street/Deacon Street to Elephant Road. A new pedestrian route is proposed along Walworth Road (in addition to the pavement alongside the road), and a widened pavement along the eastern side of Elephant Road. These publicly accessible routes across the site are welcomed, were expected by the OPP masterplan, and would be secured by a planning obligation.
344. The proposal provides a gated vehicle entrance to a service yard incorporating refuse store and three loading bays, accessed off the adjacent Deacon Street. The applicant's consultants have carried out vehicle swept path analyses which confirm that the servicing areas would have ample vehicle manoeuvring space that would ensure that rigid lorries and light vans entering and exiting would do so in a forward gear.
345. The scheme also provides disabled car parking areas and servicing/drop-off bays on Deacon Street, complemented with short-stay cycle parking areas spread across the adjoining road frontage, and a cycle ramp and lift to the basement cycle store and shower/changing facilities. Cycle access is possible along Walworth Road and Elephant Road. The new signed cycle route as part of the Elephant Park masterplan runs up Sayer Street, across the northern side of the plot and onto Elephant Road. The proposal makes provision for this new cycle route, to continue this requirement of the OPP in improving cycle access in the area.
346. There are transport impacts raised by the additional numbers of pedestrians, cyclists, public transport users and vehicles to/from the proposed development that would need to be addressed by a package of mitigation measures. The existing transport context includes: a significant level of traffic accidents in the vicinity, with the fatal or serious categories involving pedestrians, cyclists and motorcyclists; the train station has poor pedestrian access by involving steps with no accessible provision; the footways on Elephant Road and Walworth Road are substandard; the Elephant Road highway segment abutting the site would need to be resurfaced after construction of the proposal. Pedestrian safety can be improved by a raised entry treatment at the junction of Deacon Street and Walworth Road, and for pedestrians and cyclists by junction revisions at Elephant Road/Walworth Road.

347. In consideration of the proposal's impacts, officers have requested a package of measures (to be secured in planning obligations) to contribute towards highway safety, pedestrian improvements, and public transport improvements around this development including:
- Resurfacing the Elephant Road highway alongside the site.
 - Reconstructing the footways adjoining the site on Elephant Road and Walworth Road, and reduce clutter around the intersection of these two roads.
 - Amending the Elephant Road/Walworth Road junction and providing a pedestrian and cyclist crossing for Walworth Road near the railway bridge.
 - Amendments to the junction of Deacon Street with Walworth Road to allow for two-way traffic, including revised signage.
 - A financial contribution towards the design and works for improved, inclusive access to the Elephant and Castle train station and its platforms.
348. TfL notes that the Elephant Park masterplan has delivered significant improvements to the public realm, and the proposal would complement the improvements secured as part of the OPP. TfL requested a financial contribution for Legible London provision (£12,000 indexed) to improve wayfinding for pedestrians and cyclists to and from the proposal which would also be secured in a planning obligation. Elephant Road would see increased pedestrian footfall and cycle flows as a result of the proposed development. TfL suggest that the council should consider improvements to Elephant Road as the "front door" of the development, for example extending raised crossings and improving the footways on the western side. The measures listed above to improve Elephant Road and its junction are considered proportionate mitigation for the scheme.

Trip generation

349. As an office-led proposal, the majority of the predicted trips to the site are expected to occur during the weekday peak periods of 7am to 10am with staff arriving, and from 4pm to 7pm when staff leave.
350. Concerning the vehicle movements ensuing from this development proposal, officers' interrogation of comparable sites' travel surveys within TRICS travel database has revealed that the office aspect of this development would generate 59 and 54 two-way vehicle movements in the morning and evening peak hours respectively while its shop/restaurant/medical facility parts would create 11 and 24 two-way vehicle movements in the morning and evening peak hours. Overall, this development would produce 70 and 78 two-way vehicle movements in the morning and evening peak hours separately. Although officers' forecasted two-way vehicle movements for the morning and evening peak hours are higher than the peak traffic hours predicted by the applicant's consultants, officers consider that these levels of vehicular traffic would not result in any noticeable adverse impact on the existing vehicle movements on the surrounding roads.
351. Visitors to the site would likely use sustainable modes, given the lack of on-site parking, the various public transport options in the area, cycle links and cycle parking. The applicant has proposed travel plan initiatives encompassing the appointment of a site-wide travel plan co-ordinator, cycling facilities including

shower, lockers, providing travel information, and monitoring. A travel plan would be secured by a planning obligation to ensure the measures outlined to encourage the use of sustainable modes are put in place and promoted.

352. The submitted Transport Assessment acknowledges that working patterns may change after the pandemic with people starting work earlier or later and possibly lower numbers using offices, but the assessment has continued to assess the scheme on the established working patterns as a worst case scenario. The applicant's consultants have estimated that this proposed office-led development would create some 1,602 and 1,574 two-way public transport trips in the morning and evening peaks hours correspondingly. For a health hub scenario, although the applicant found the total daily trip rate associated with health use was higher than for office use, the peak hour person-trip generation was similar or lower. Therefore, for conservative peak hour trip generation, it was assumed that the potential medical/health uses would be assessed on the basis of office floorspace.
353. Officers note that the nearest southbound bus stop at the Shopping Centre currently has neither a shelter nor countdown information system and the closest northbound bus stop on Walworth Road has no bus countdown, and that this locality would benefit from improved bus services via the adjacent Heygate Street to help accommodate the numbers of people predicted to use buses travelling to/from the proposed development.
354. TfL notes that although the site has a wide range of public transport options, pre-pandemic services were crowded at peak times. TfL's key concern is the impact on Underground station, which was identified as a priority for capacity improvements in the 2012 Elephant and Castle OAPF SPD. A strategic transport tariff funding contribution of £13m (indexed) was secured as part of the 2013 OPP section 106 agreement for the Elephant Park masterplan to be used on strategic transport improvements as listed in the Elephant and Castle SPD and OAPF. The two listed strategic transport infrastructures are the step free access to the Northern line with the replacement of lifts with escalators at the Northern line ticket hall (NLTH), and the northern roundabout works (now completed). The £13m (plus indexation) is to be paid in two parts on completion of the NLTH and one year after completion of the NLTH. The NLTH is designed to accommodate a future Bakerloo line extension, as well provide capacity required for the growth in this Opportunity Area. The current Plot H1 proposal is a significant uplift in commercial floorspace beyond that approved by the OPP. TfL notes that other s106 contributions towards the NLTH have been secured on other recent permissions. TfL requests a financial contribution of £1,721,384 (indexed) using a similar rate per square meter of office floorspace, towards the NLTH works in order to contribute to the transport improvements for this development.
355. Elephant and Castle train station is 30m to the north-west of the site. It has steps up to its entrance on Elephant Road and steps to all platforms. Separate to this planning application, TfL asked the council to support its application for the station's inclusion on Network Rail's programme of stations seeking Access for All funding, and the council gave its support. Network Rail and Govia Thameslink Railway are working with the council to seek to deliver step-free access (referred to by Network Rail as "Access for All") at the train station. This would allow for a step-free public transport interchange with the Underground and bus services.

The Access for All programme aims to address issues faced by disabled passengers and passengers facing mobility restraints (such as those with heavy luggage, children, pushchairs and shopping) when using railway stations by creating an obstacle free, accessible route from the station entrance to the platforms. This generally includes providing lifts or ramps, and associated works and refurbishment along the route. This first feasibility study assessed two design options and was funded by the council, Lendlease and Delancey (applicant for the Shopping Centre). Third party contributions will be required and bids for funding from the Department for Transport to fund the project.

356. The early estimates for the project cost are between £10m and £20m and it would be of benefit to the existing community and future residents, workers and shoppers. Further detailed design and technical work would be required to firm up prices and understand risk. As Plot H1 is right next to the train station and would likely be used by staff and visitors of the proposal, Network Rail has requested a financial contribution of £1.7m to the total cost of the station works to improve access. It states that without this contribution, it is highly likely that the station will continue to not be fully accessible compared with the rest of the new step-free town centre and underground interchange services. Network Rail also suggest that while its requested contribution may take funding away from TfL, TfL has more opportunities to receive funding from developments across London.
357. In terms of the policy support for station improvements, the Southwark Plan area vision AV.09 states development in Elephant and Castle should “*Improve the train and underground stations, provide step-free access, provide a new ticket hall for the Northern Line an Bakerloo Line extension and enable new transport infrastructure links with the surrounding areas by providing safe and accessible walking, cycling and public transport routes*”. Transport mitigation contributions used for the NLTH or for the train station access improvements would comply with this part of the area vision.
358. The two transport bodies have requested significant sums from the Plot H1 proposal that would be additional to the transport mitigation secured on the OPP. Officers are of the view that a financial contribution of £1.7m should be secured on a planning permission to mitigate part of the public transport impacts of the proposal, and that it should go towards the train station improvements as the priority, as the plot is next door to this station and no other funding has yet been secured through the planning process for improvements. The NLTH has funding from the council’s Southwark CIL receipts, the OPP, the shopping centre, Skipton House and will likely receive further contributions from other sites coming forward in the area. If the design studies for the train station find that improvement works are not possible, or the works fail to progress, the council would use the remaining contribution amount to fund the NLTH works or other Underground improvement instead.

Servicing and deliveries

359. A draft delivery and servicing management plan was provided, which states a booking system would be in place for deliveries to the internal servicing yard, and includes swept path drawings to show how vehicles can enter and exit the

yard in forward gear. The servicing for the development would be mainly carried out from the internal loading dock, with vehicles both entering and exiting Deacon Street from Walworth Road to minimise disruption to the wider street network within the masterplan. Vehicles will exit on to the two way section of the revised layout of Deacon Street. The detailed design of the planters either side of the servicing yard entrance to ensure the visibility displays were amended following comments from the highways development management team.

360. The one way section of Deacon Street provides two accessible parking bays and one drop off/emergency parking bay for Plot H1, a double loading bay and a blue badge bay reprovided for the use of Plot H2. Deacon Street is not intended to be for general vehicular use and is not on a signed cycle route. There is, however, nothing to deter cyclists from using Deacon Street as a cut through to Walworth Road leading to potential conflict with service vehicles and mitigation measures need to be put in place, such as signage and road markings. Such details of the Deacon Street layout and signage would be required to be submitted and approved by a planning obligation.
361. The development of office space, affordable workspace and retail uses is expected to generate up to eight servicing vehicles per hour. Based on a typical servicing vehicle time slot of up to 20 minutes, the three loading bays could accommodate up to nine vehicles an hour and therefore the proposed layout is expected to be adequate for the forecast demand of 108 to 118 vehicles per day. As a health hub, the applicant suggests that an additional one or two delivery vehicles per day are likely to occur, which can be accommodated in the internal servicing yard. A drop off bay is proposed on the northern side of Deacon Street for this proposal, in addition to the relocated loading bay on the southern side of Deacon Street for Plot H2. These would provide further options for ad-hoc deliveries by smaller vehicles.
362. The submitted draft delivery and servicing management plan would need to be updated and refined to require all deliveries to be pre-booked, include actions to consolidate deliveries, and using transport operators who have at least “silver” membership of FORS. A planning obligation is proposed to secure the submission and approval of this document, regular reporting from the applicant on how the plan is complied with (or not), a delivery and servicing deposit to be paid to the council and a monitoring fee. These would allow the council to monitor whether the development is operating in accordance with the approved plan, and for additional measures to be put in place if the servicing operations are found to not be in accordance with the plan and causing transport issues.

Refuse arrangements

363. Each upper floor of the building includes a waste store to hold collected (and segregated) waste before it is brought down to ground level by the facilities team in the service lift. The ground floor units would use the back of house corridors to access the service yard store. Refuse storage for all uses is shown within the servicing yard to allow ready collection of waste and recycling by refuse vehicles within the yard two to three times a week. There is space in the yard for a compactor, a cardboard baler and a hazardous waste cabinet (for health hub medical waste). The servicing yard can accommodate the expected number of collection vehicles. The delivery and servicing plan required by a planning

obligation would include refuse collection arrangements to be submitted and approved.

Car parking

364. Walworth CPZ provides parking control on public roads in this vicinity on weekdays from 08:30 to 18:30. There are a few car clubs in the area, and the OPP masterplan will provide further car club spaces.
365. The Plot H1 proposal is car-free with the exception of two accessible car parking spaces in a bay on the northern side of Deacon Street, with electric vehicle charging provision to these two spaces (a condition to require further details is proposed). The car parking spaces are to be located on the northern side of Deacon Street, accessed via Sayer Street to the east and Heygate Street. Vehicles would then exit westwards onto Walworth Road. Deacon Street is part of the Elephant Park estate and would be managed by the estate management team, rather than the council as it is not adopted highway. The applicant's management team would manage the parking bays to prevent improper use or obstruction by non-disabled users that would otherwise prevent their availability as accessible parking bays.
366. On the southern side of Deacon Street a third accessible car parking space would be provided, re-providing the existing single space for Plot H2's use that is currently on this southern side of the road. This would be sited in front of Plot H2's main lobby entrance, and closer than the existing parking space.
367. Given the excellent PTAL rating of the site, within the town centre, the very low car parking provision is acceptable for an office scheme with affordable workspace and retail provision. TfL considered the car free approach with only disabled parking spaces that have electric vehicle charging to be in line with the London Plan.
368. In a health hub scenario, health staff are more likely to need vehicles for their jobs working out in the community than general office workers. Informed by the early discussions with the NHS, the applicant has indicated where 10 car parking spaces and two blue badge spaces could be provided for health hub staff in the existing basement car park of Plot H2. These constructed spaces are currently not used by Plot H2 residents. These suggested spaces would be accessed through the main lobby of Plot H2 (lift and stair options), to exit onto Deacon Street. This would be a distance of approximately 150m from an entrance in a Walworth Road unit, with seating provided in the H2 lobby and in the proposed public realm to allow for resting. The highways teams raised concern with this as it is further than the 50m distance suggested by the national guidance, even with the provision of rest points along the route. They are the closest off-street parking spaces that could be repurposed to be for a health hub use however; any further provision at grade would remove public realm or space within delivery bays, or public highway if off-site which would not be dedicated to Plot H1.
369. Patients who are blue badge holders would be able to use the accessible parking spaces on Deacon Street. Patients can also be dropped off in the bay on the northern side of Deacon Street in private vehicles, taxis or health authority

transport, and there may be space within the servicing yard to accommodate health authority transport.

370. The suggested off-site parking in Plot H2 is indicative only, and the design of the in-plot servicing yard may develop with further input from the health hub operator. A planning obligation would secure the submission and approval of further details of how the transport operations would function if a health hub is provided, for the staff, health hub functions and patients. Such details would include the number, location and turning areas for staff parking spaces, parking for health hub vehicles, wheelchair staff parking spaces, the route for staff to Plot H1 (and resting points along the way), the provision of ready access for staff through entry doors in Plot H2 at all times, as well as blue badge parking for patients, drop off facilities for the health provider and patients.

Cycle parking and cycling facilities

371. The proposal includes long-stay cycle parking for staff in the basement levels, accessed via a cycle lift and ramp from the ground floor in the Walworth Road frontage. A total of 855 long-stay cycle parking spaces are proposed for the employees, 20% (85 spaces) would be provided as Sheffield stands, including 9 spaces that are accessible/oversized for non-standard bikes. The remaining long-stay cycle parking would be provided as two-tier cycle racks (75%), and folding bike lockers (5%). This provision meets and exceeds the minimum long-stay parking requirements of the London Plan across the uses in a maximum office scenario (by 84 parking spaces), and would further exceed the minimum requirement if there is a health hub use. However it falls short of the Southwark Plan's requirement of at 1,276 spaces for a maximum office scheme. In a scenario with the minimum office provision, plus health and retail the scheme would require at least 1,102 staff spaces for all uses. The cycle provision also falls short of the average number between the London Plan and Southwark Plan policy requirements (average of 886 spaces in the minimum scenario). The applicant has not proposed a cycle hire facility.
372. The extent of the basement is constrained by the adjacent London Underground lines, and provision at ground floor level would remove active frontage. Further stacked cycle parking could be provided in the basement instead of Sheffield stands but this would reduce the quality of the facilities. The proposal is considered to make sufficient cycle parking provision (by balancing number with quality), providing that free membership of the cycle hire scheme is made available to occupiers and a financial contribution secured to improve cycle hire capacity. These would be secured as planning obligations. A condition would require further details of the cycle parking to include disabled and cargo bike parking, and shower facilities for staff.
373. Turning to the short-stay visitor cycle parking provision, this would be located in the public realm areas at ground floor with 48 Sheffield stands providing 96 cycle parking spaces, distributed around the perimeter of the site, including spaces near to the servicing yard office to be convenient for cycle couriers. This provision would provide for most of the possible use combinations that give a range of between 38 and approximately 112 visitor cycle spaces using the London Plan ratios and is mainly driven by the amount of retail floorspace. The Southwark Plan visitor cycle parking requirements are larger and give a range of between

219 and 323 spaces to achieve the minimum requirement. While further cycle parking could be provided in the areas of public realm within the proposal, the application is considered broadly to balance cycle provision with the quality of the public realm and landscaping within the site and the surrounding completed masterplan, and the applicant has given consideration to provision of further cycle stands. A condition about visitor cycle parking is proposed as it may be possible for further stands to be incorporate as the future tenants are confirmed and the landscaping design is finalised. TfL requested a financial contribution towards improving cycle hire facilities in the area, which would be a planning obligation.

374. TfL considers the proposed cycle parking numbers to accord with the London Plan standards, the layout of the long and short stay cycle parking is generally well designed and is acceptable, in line with the London Cycle Design Standards.
375. The site-wide requirements from the OPP's section 106 agreement for the remaining cycle docking station spaces and car club provision for the OPP masterplan have been recently resolved, without requiring any docking spaces with Plot H1. This means the current application does not need to make provision for a docking station to address an OPP obligation. The last two docking stations for the OPP masterplan are proposed to be located close to Plot H1, within Castle Square and so would be available to Plot H1 staff and visitors. Addressing the OPP's cycle hire needs does not include the additional development this Plot H1 application proposes, which is larger than the outline parameters approved for this larger plot. TfL requested a proportionate contribution towards cycle hire capacity of £120,000 (indexed) to address the additional needs of the proposed development, and this would be secured in a planning obligation.

Highway works

376. Pedestrian and cycle improvements are proposed at the junction of Elephant Road and Walworth Road, to increase the safety for vulnerable road users crossing Walworth Road; the crossing and raised table would be delivered as part of the required highway works of the wider OPP Elephant Park masterplan. Design options are currently being discussed with the council's highways and transport policy teams. These measures are also important to provide safe, improved, pedestrian access from the west of the site to the Plot H1 proposal. The section 106 agreement for the Plot H1 proposal would contain an obligation to require these highway works to be undertaken prior to first occupation of Plot H1, in case they are not delivered by the OPP masterplan by that time.
377. The council is proposing improvements to Elephant Road, which is expected to include increased pedestrian provision in association with reduction of loading bay provision for the retail units in the arches. These works would link into the additional pedestrian and cycle crossing on New Kent Road, to the west of its junction with Elephant Road, which would further improve options to access Plot H1 from the north. The delivery of improvements for Elephant Road by resurfacing and upgrading the pavement alongside this application site would be secured in a planning obligation. The works to Walworth Road, to renew and upgrade the kerbs, footways, street lighting and tree pits in line with the SSDM, and to offer parts of the site for adoption to allow for 2.4m wide footways would also be secured highways works.

Other transport matters

378. As the plot is close to London Underground tunnels, a condition has been requested by LUL/TfL to require further information on infrastructure protection. This has been included in the recommendation. A planning obligation would require parts of the site on Elephant Road and Walworth Road to be offered for adoption as public highway to achieve 2.4m wide footways.
379. The ground floor plan was revised to remove most of the outward opening doors shown on the initial submission, in the interest of pedestrian safety; those that remain serve fire escapes which would be infrequently used in an emergency only.
380. A revised CEMP would be required to be submitted and approved, as the submitted draft document needs to be amended and expanded upon. The comments from the Highways development management team relating to the SSDM, drainage, building overhangs, and a joint condition survey can be added as informatives on any permission.

Environmental matters

Construction management

381. A draft CEMP was provided with the application but would need to include further details and amendments in order to be acceptable. There is a site-wide obligation for each plot of Elephant Park to submit a detailed construction environment management plan, and a similar obligation would be included in the legal agreement for Plot H1. The ES expects a CEMP to be provided to detail mitigation measures and controls for the construction phase to reduce air quality and greenhouse gas impacts. The plan would include management measures to control such topics as dust, noise, working hours, air quality monitoring, and construction traffic logistics management, particularly as Plot H2 is occupied, the site is on a main road and the public park would remain open.

Water resources

382. Thames Water raised concern that there is insufficient capacity in the fresh water network and foul water network to accommodate the development's demands and flows without upgrade works. It recommends three conditions (which have been combined into one in the recommendation) to require confirmation the necessary network upgrades have been carried out prior to occupation of the development.

Flood risk

383. The site is in flood zone 3, and benefits from the Thames flood defences. The development is for non-residential uses. A flood risk assessment was provided with the application, which sets out how the finished floor levels and basement entrances are located above the design flood level as these have been raised

above the existing ground levels. Flood resilient techniques for the ground floor uses would provide additional flood protection. The basement levels would have protective measures in their construction.

384. The Environment Agency consider the flood risk assessment to provide an accurate assessment of the tidal and fluvial flood risks. To address the residual flooding risk, a flood warning and evacuation plan would be secured by condition. Subject to these conditions the proposal would comply with London Plan policy SI 12 “Flood risk management” and P68 “Reducing flood risk” of the Southwark Plan.

Sustainable urban drainage

385. The submitted basement impact assessment considers the geology of the site, previous site investigations, groundwater levels and summarises the proposed substructure design. It also considers the proximity of the site’s basement and foundations to the London Underground tunnels. The plot is not within the safeguarding area for the Bakerloo Line Extension.
386. The green roofs would store some rainwater. Below-ground water storage is proposed beneath the eastern end of the building, and beneath parts of Deacon Street and Walworth Road paving and planters to slow run off rates. Also, part of the surface water run-off from the public realm would be directed to the rainwater gardens in the park. The drainage strategy was revised in response to the lead local flood authority’s and GLA’s comments, and is now acceptable. A compliance condition is recommended in this regard.
387. The Environment Agency recommend a condition to prevent infiltration of surface water drainage without details having been approved. Subject to conditions the proposal is considered to comply with London Plan policy SI13 “Sustainable drainage” and P68 “Reducing flood risk” of the Southwark Plan.

Land contamination

388. Historic maps show the site was developed around the 1850s and was used for housing, pub, school, timber yard, laundry, carriage works, stables, and in the 1950s by an engineering works and bedding factory. Industrial uses are shown in the immediate surrounding area on the historic maps. The Heygate Estate redeveloped this site with housing and car parking; following its demolition the site has been used for temporary buildings.
389. Based on the review of desk study information, the submitted phase 1 geo-environmental assessment considers there are low to moderate risks for future site users, off-site users, future buildings and to groundwater. The basement construction would remove the made ground (with its contaminant sources), down to the London clay layer below. A remediation strategy is proposed to address any unforeseen contamination encountered during earthworks, along with protection to buildings and landscaping beds. A detailed, plot-specific phase 2 site investigation is proposed which aims to assess the geological profile, chemical composition of the soils, and the groundwater flow direction.
390. The report was reviewed by the Environment Agency and the council’s

environment protection team, who recommend conditions relating to site investigation, unexpected contamination, verification of the remediation works, and no piling without consent, to reduce the risk of water pollution. Subject to these conditions the proposal is considered to comply with Southwark Plan policy P64 “Contaminated land and hazardous substances”.

Air quality

391. Air quality was considered in the ES to assess the impacts from traffic and plant (including the use of the Elephant Park energy centre) on sensitive receptors. The proposal’s effects on air quality at operational stage would not be significant, and would be better than air quality neutral for building emissions, air quality neutral for transport emissions. It complies with London Plan policy SI1 “Improving air quality” and Southwark Plan policy P65 “Improving air quality”. No mitigation is required for the operational development. During the construction phase, dust mitigation measures (identified in the 2020 ES for the Elephant Park masterplan), compliance with non-road mobile machinery low emission zone standards, and an air quality and dust management plan would be secured through a CEMP and monitoring by a planning condition.

Wind

392. The ES considers the likely wind impacts and mitigation measures for the proposed massing of Plot H1, and takes account of the constructed and approved buildings in this area. Computer modelling and wind tunnel testing were undertaken with the consented Elephant Park plots in place and in a cumulative scenario with other approved schemes. It assumed no ground level landscaping to give a “worst case” wind environment.
393. With no mitigation measures in place, the majority of the proposal would be suitable and safe for the intended use, including the proposed roof terraces spaces. The public realm within the site and the roof terraces generally would have wind speeds appropriate for sitting and standing pedestrian comfort levels. There would be winds speeds comfortable only for “strolling” (rather than sitting or standing) along Deacon Street, on Walworth Road around the junction with Elephant Road, and on Elephant Road in the windiest season. The testing highlighted one thoroughfare location in the public realm towards the west of the plot (where a minor adverse effect would occur), and three seating locations along the western elevation and south-eastern corner of the plot which would be windier than desired for seating and therefore require mitigation.
394. The revisions made in December 2021 to add creases and further terraces to the northern and western façades of the proposal were not expected to influence the wind conditions at ground or elevated levels from those set out in the ES. The additional terraces are expected to have suitable “sitting” conditions for users during the summer months with the planting providing further screening, so that no mitigation is proposed.
395. Landscaping features such as retaining the mature trees on Walworth Road, additional tree planting on the western side of the site, and large moveable planted pots on the south-eastern and western sides close to ground level

seating would address the highlighted wind issues and no further mitigation would be required. With mitigation in place, the residual wind effects within the site and surrounding areas would be insignificant, or of minor to moderate beneficial significance in ES terms. Landscaping conditions, including a requirement for the planting to be in place prior to occupation are included in the recommendation. Subject to these conditions, the proposal is considered to have addressed the wind effect elements of the tall buildings policies D9 part C.3)a) of the London Plan and P17 of the Southwark Plan.

396. In the cumulative scenario, the ES considers the proposal would generally have insignificant effects, minor and moderate beneficial effects on wind conditions in the area. Windier conditions would occur along Elephant Road, to “strolling” comfort level, and to a bus stop on the western side of the viaduct that the bus shelter should mitigate.

Light pollution

397. The ES includes consideration of the likely light levels from the office building out to the façades of facing buildings and has been summarised in the neighbour amenity impacts section above. The public realm lighting around the base of the building would continue the lighting installed across Elephant Park to light the new public routes as well as Walworth Road and Deacon Street, and would not raise significant light pollution issues. Further lighting details would be secured by condition.

Energy and sustainability

398. The ES includes the topic of greenhouse gases in its assessment. It concludes that the completed, occupied development would represent 0.6% of the annual borough-wide greenhouse gas emissions at 2017 levels, and 0.01% of London’s emissions. The measures such as minimising materials during construction, having no parking for construction workers, having a travel plan in place for the completed development (with its cycle parking and limited vehicle parking) and the carbon reduction measures would help reduce greenhouse gas emissions. The ES concludes the residual effects of the greenhouse gas emissions from the proposed development are anticipated to be indirect, long term, global, significant and adverse. Guidance from the Institute of Environmental Management and Assessment states that any net emissions increase associated with a project, no matter how small, is considered a significant effect in ES terms, hence the conclusion in the ES. The conclusion therefore recognises the seriousness of the climate emergency rather than the Plot H1 proposal being a particularly large source of greenhouse gas emissions. As set out below, measures have been taken in the design and would be taken in the completed scheme to reduce emissions associated with the proposal and to minimise the greenhouse gas effect as far as possible.

Whole life cycle and carbon capture

399. The embodied carbon estimates the carbon involved in sourcing, producing and transporting the construction materials to the site, and forms a large portion of the overall carbon emissions involved for a development. The submitted whole life carbon assessment for Plot H1 and its later addendum consider the

operational carbon and embodied carbon of the proposal throughout its life from construction, use and deconstruction.

400. The proposal would be constructed from a hybrid steel and cross-laminated timber frame, using renewable timber as a more sustainable material. In comparison to a concrete framed building of the same scale it would have a 54% lower carbon impact from its frame. The reduced volumes of metal and concrete that are to be used within the proposal would have the largest impact, and measures such as using façade materials with 60-75% recycled aluminium have been included and reducing the slab thicknesses to keep the concrete requirement down.
401. The on-going energy requirements of the proposal are by far the highest proportion of carbon emissions (at 75.6%) across the life of the proposed development with current grid electricity. The materials, their transport, repair replacement and end of life stages represent the other 24.4% of the proposal's whole life cycle carbon for a 60 year building service life with current grid electricity. The overall embodied carbon for the proposal has been given a D rating (on a scale of A as the best and G as the worst).
402. For this planning stage of the proposed development, the applicant has demonstrated its consideration of the materials to be used in the building, how to reduce use of more carbon-heavy materials, how to use recycled and recyclable materials, and considered the reuse of the materials at the end of the building's life. These measures have reduced the life-cycle carbon emissions of the proposal, so that the overall D rating is in line with policy SI2 part F of the London Plan. Two conditions to require two further stages of whole life-cycle carbon in the detailed design and completion stages are proposed.

Carbon emission reduction

403. Having worked to achieve a high level of sustainability in the embodied carbon of the proposal, the operational energy aspect is not as successful at exceeding minimum policy requirements. The applicant is keen that both elements are considered together to give the whole life carbon of the proposed development. The paragraphs below go through the stages of the energy hierarchy, in line with London Plan policy SI2.

Be Lean (use less energy)

404. The submitted energy statement shows the "be lean" measures with the fabric of the building, solar shading, efficient lighting, and ventilation to reduce the need for cooling. Together these would give an estimated 24% reduction in the operational carbon emissions for the regulated aspects (which includes heating, lighting, ventilation, cooling and pumps).

Be Clean (supply energy efficiently)

405. The "be clean" measure is the next in the hierarchy to supply energy efficiently and cleanly. Plot H1 would connect to the existing Elephant Park heat network, which is powered by the energy centre within the masterplan. The energy centre uses gas to generate heat and hot water for the buildings within the masterplan

as a lower carbon source of heating and hot water. Each building therefore does not require its own main energy sources such as electric heating or gas boiler, which are smaller, less efficient and with smaller carbon savings.

406. Plot H1 would be connected into the Elephant Park heat network to provide most of its heating need. The connection would meet the GLA guidance of prioritising connection to an existing district heating network. The connection would reduce carbon emissions by another 14% to give a total regulated carbon reduction of 38% from the “be lean” and “be clean” stages.
407. As an existing, established network with an energy centre burning natural gas, the Plot H1 proposal would have to use this heat supply and its associated carbon emissions, rather than being able to choose any newer or less carbon intensive network. The applicant did consider, and dismiss, a design option of using heat pumps to serve Plot H1 instead of using the masterplan’s energy centre. This would have resulted in improved carbon savings for the plot but not used the existing plant in the energy centre, and would have required much more roof plant on the proposed building, which in turn would have affected its appearance and needed further neighbour amenity considerations of noise.
408. The energy services company who operate the Elephant Park energy centre, Eon, is considering its own decarbonisation strategy to reduce future carbon emissions, such as reducing the temperature of the network, the potential to capture waste heat from within the energy centre or from the TfL Underground network.

Be Green (Use low or carbon zero energy)

409. No significant “be green” measures are proposed. Air source heat pumps are proposed to the Walworth Road ground floor units however they have a very minimal impact on the overall carbon emissions. The applicant suggests that the smaller roof area at the top of the building and the amount of roof level plant already included in the proposal prevents PV panels or other renewable energy sources being included. With the Elephant Park heat network providing hot water and heating to the plot, there is limited demand left for air source heat pumps to provide.
410. This means the total carbon savings are 38%, which exceeds the minimum 35% on-site reduction of London Plan policy SI2 part C but does not achieve the 40% on-site reduction of Southwark Plan policy P70. The limitations of using the existing network are acknowledged and a planning obligation would allow for approved carbon reductions to be proposed in a revised energy strategy. The remaining carbon emissions of 441.4 tonnes per year would require a payment to the offset fund of £1,257,990 (indexed) in order to achieve the zero carbon requirements of the London Plan policy SI2 part C.1). This would be secured by a planning obligation, and could be recalculated if they carbon savings are improved.
411. Lendlease has highlighted the Elephant Park energy services company’s existing commitment to procure the addition of “green gas” (from renewable sources, such as biomethane from animal waste) elsewhere in the national gas grid to offset all the natural gas used in the Elephant Park energy centre. This

offsetting is not accounted for within the carbon modelling and calculations reported above, nor is it a requirement of the OPP. The applicant suggests that were the biomethane to be included in the modelling, the overall carbon savings for Plot H1 would be approximately 60%.

412. Policy SI2 part E of the London Plan now requires major development proposals additionally to calculate and minimise carbon emissions from other part of the development which are not covered by the Building Regulations (unregulated emissions) such as plant and equipment. The applicant says it is committed to purchasing 100% renewable electricity tariffs for the unregulated operational energy uses (e.g. for IT equipment and appliances), which would meet the UKGBC's Renewable Energy Procurement and Carbon Offsetting Guidance definition of the building as being "net zero". Lendlease proposed a planning obligation requiring tenants and any future owner of the building to purchase the same zero carbon electricity. There is no planning policy basis on which to require this commitment to the electricity provider for the unregulated electricity demand, and this is not considered to be a necessary, nor reasonable, planning obligation that is required for planning permission to be granted. Lendlease may of course choose to make this commitment separate to the planning system and to achieve the associated "net zero" accreditation if it wishes outside of the planning permission's requirements.

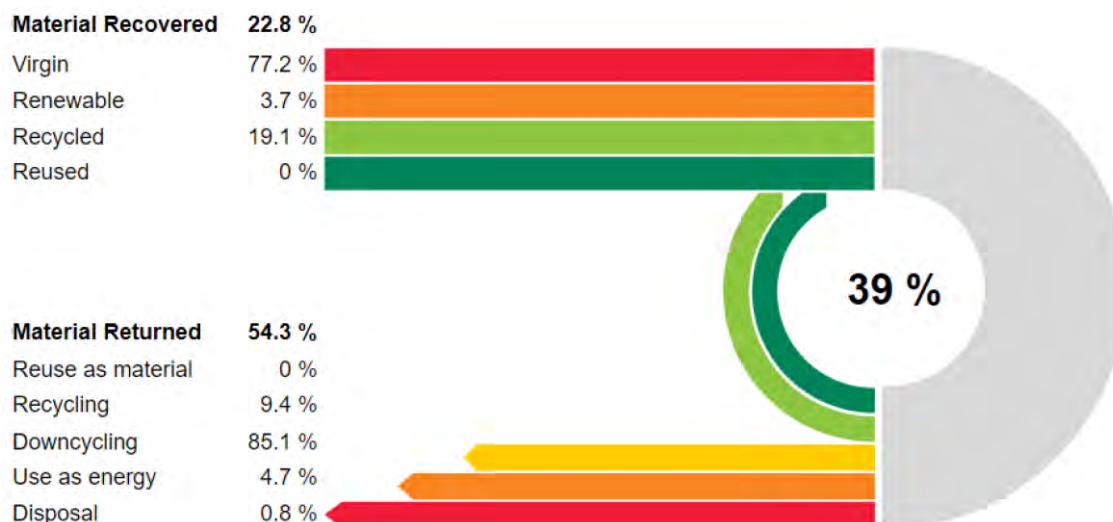
Be Seen (Monitor and review)

413. The London Plan and Southwark Plan policy P70 "Energy" requirements to monitor, verify and report on energy performance in the completed development, including a review to verify the carbon savings, would be secured in a planning obligation. In correspondence with the GLA, the district heat network operator provided information on potential decarbonisation opportunities and the GLA has requested that the decarbonisation strategy be reviewed, and this would be included as part of the planning obligation.

Circular economy

414. The submitted circular economy statement assesses the proposal against the circular economy hierarchy of refurbishment, repurposing, deconstruction and reuse, and finally demolition and recycling in order to maximise the materials and resources circulating in the economy and reduce reliance on virgin materials. The applicant has aimed to select building elements designed to be long lasting, adaptable and flexible, be easy to disassemble, and has considered how to minimise the quantities of materials used, and sourcing resources sustainably.
415. The use of the cross-laminated timber for part of the main frame reduces the embodied carbon of the proposal, and was chosen for its longevity, adaptability, reusability and recoverability of the materials. Construction waste would be minimised and a minimum of 80% waste diverted from landfill with a waste management plan implemented.
416. Further information was provided in response to the GLA's comments. The proposal has a building circular economy score of 39%. The construction of Plot H1 would use 22.8% of its materials as recovered (i.e. renewable or from recycled sources), and when deconstructed at the end of its life 54.3% of its

materials could be recycled, downcycled or used for energy.



417. The application has addressed the requirements of London Plan policy SI7 “Reducing waste and supporting the circular economy”, Southwark Plan policy P62 “Reducing waste” part 4, and had reference to the GLA’s guidance in producing the circular economy statement. Conditions are proposed to require a final version of the circular economy statement, and post-completion reporting. Subject to these conditions, the proposal is considered to comply with the sustainable materials element of policy P17 “Tall buildings”.

Overheating

418. A short overheating assessment was included in the energy assessment. It summarises the measures in the building’s design (solar shading from the fins to limit solar gain, high ceiling heights, and mechanical cooling involving passive chilled beams and floor ventilation) to prevent overheating for future occupiers. The southern façade of the building would be partly overshadowed by Plot H2. The office and retail units would not experience overheating, and the proposal is considered to comply with London Plan policy SI4 “Managing heat risk”.

BREEAM

419. The original BREEAM pre-assessments for the proposal show a BREEAM rating of 70.84% being targeted for the office, with a potential mark of 84.71%, which is above the 70% mark for an “excellent” rating. The retail element targeted a score of 70.67% with potential to increase this to 83.95%. A more recent document (October 2021) shows how an “outstanding” rating will be targeted which requires a score of 85% or higher, and with the targeted score of 92.6% set out at this early stage. The applicant is committing to meeting the “outstanding” BREEAM rating, and a condition to this effect is proposed.
420. Achieving an “outstanding” BREEAM rating in the completed development would exceed the requirement of an “excellent” rating required by Southwark Plan policy P69 “Sustainability standards”, and is one indication that the proposal is achieving a high level of sustainable construction.

TV, radio and telecoms networks

421. A TV and radio reception impact assessment was provided which considers the impact of the proposed tall building on digital TV reception from the Crystal Palace transmitter, as well as satellite TV reception and radio reception from a survey of the area. The proposal is considered not to require mitigation for digital TV given the proximity of the transmitter and lack of antennas in the signal shadow zone. The cranes and construction of the proposed building could cause signal disruption to satellite TV reception within approximately 173m of the site to the north-west (i.e. the Shopping Centre site and Elephant Road railway arches). Any satellite dish would need to be relocated to address any issue in this area. A mitigation scheme for these relocation works should they be attributed to the Plot H1 construction would need to be secured on any permission, and a condition to that effect is proposed.
422. Arqiva has considered the effects on TV and radio operation, and has no objections to the proposal.
423. A condition is proposed regarding fibre connectivity into the development, to ensure compliance with policy SI6 “Digital connectivity infrastructure” of the London Plan.

Aviation

424. London Plan policy D9 in part C.2)f) refers to tall buildings not interfering with aviation. No consultation responses were received from the Civil Aviation Authority nor the National Air Traffic Safeguarding. Given the height of this building relative to nearby tall buildings in the Elephant Park masterplan, it being of similar height to the OPP maximum height for this plot, the approved Shopping Centre redevelopment and other tall buildings in the area, this proposal is considered not to raise aviation safety issues.

Planning obligations (Section 106 agreement)

425. Policy 8.2 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. The Section 106 Planning Obligations SPD 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.
426. Following the adoption of Southwark’s Community Infrastructure Levy (SCIL) on 1 April 2015, much of the historical toolkit obligations such as Education and Strategic Transport were replaced by SCIL. Only defined site specific mitigation that meets the tests in Regulation 122 can be given weight.
427. Officers also have had regard to the planning obligations in the section 106 agreement associated with the 2013 outline planning permission, to ensure the

remaining mitigation measures continue to be provided by the OPP or the Plot H1 planning obligation or by both where relevant. A deed of variation to the 2013 section 106 agreement would be required to confirm that if the Plot H1 permission is implemented, the Plot H1 application site would be formally “slot out” from the 2013 s106 agreement’s site and remit.

428. The following heads of terms need to be secured as planning obligations to ensure the proposal complies with planning policies, to secure the mitigation needed to minimise the adverse effects of the development, and suitably relate to the 2013 s106 agreement.

Planning Obligation	Mitigation	Applicant Position
Health hub provision as the priority option	<p>To use reasonable endeavours to deliver a health hub within the development.</p> <p>To set out the steps of engagement by the applicant with the health bodies and council after the grant of planning permission to progress the health hub.</p> <p>If a health hub is to be delivered:</p> <ul style="list-style-type: none"> • To deliver a health hub on-site that is let to the NHS or an equivalent public health operator agreed by the council. • Details of the area, location in the building, its layout, fit out level/specification and rent to be submitted for approval. If the size of the health hub is less than 10% of the scheme, then information to demonstrate the “equivalence” in value to a 10% affordable workspace scenario over 30 years shall be provided for review and approval. • If the value review shows that on-site affordable workspace can be provided in addition to a smaller health hub to achieve equivalence, to require an area of affordable workspace provision on-site. Along with the associated affordable 	Agreed

	<p>workspace details, rents and service charges (as for the second scenario below), and provided for 30 years.</p> <ul style="list-style-type: none"> • Allowance for a payment in lieu for any small shortfall in on-site provision, in line with the council's affordable workspace calculator at that time. • Health hub to be handed over to the agreed operator prior to 50% occupation of the offices, and retained as such for 30 years. • In the event that the health hub use ends within 30 years of first occupation, if required to achieve policy compliance, the area is to be made available as affordable workspace, with details to be submitted for approval (as for the second scenario below). <p>If a health hub is not progressed by set milestone(s), then evidence of the engagement undertaken and reasons for not progressing are to be submitted to the council for agreement, before the affordable workspace scenario is progressed instead.</p>	
<p>Second scenario for affordable workspace provision on site instead of a health hub</p>	<p>In the event that a health hub does not come forward, to submit an affordable workspace strategy for approval.</p> <p>To provide 10% of the total office floorspace quantum, including detailing the area, location(s) within the building and details of the affordable workspace operator(s), marketing requirements, fit out specification, facilities, at 25% discount on market rent levels, with capped service charge at £4.50/sqft, and</p>	<p>Agreed</p>

	<p>access to the cycle parking, servicing yard etc.</p> <p>Affordable workspace to be provided for 30 years. Annual monitoring reports to be provided.</p> <p>Allowance for a payment in lieu for any small shortfall in on-site provision, in line with the council's affordable workspace calculator at that time.</p>	
Control of the flexible uses applied for	<p>To ensure the affordable workspace remains as at least 10% of the actual office use on site (due to the range of uses sought for the lower floors), an obligation to prevent more office use being occupied after first occupation without a related increase in affordable workspace would be included.</p> <p>Similarly, to prevent further health use being occupied unless part of the health hub operated by the named public health operator.</p>	Agreed
Ground floor lobby	<p>Layout and uses to be submitted for approval prior to implementation, to include provision of an accessible, free public toilet, free public WiFi, phone charging points and seating.</p> <p>To construct in accordance with the approved details, and a minimum of 500sqm made available for free, public use, 7 days a week (exact opening hours to be agreed).</p> <p>Management details to be agreed.</p>	Agreed
Energy statement and carbon offset financial payment	<p>Compliance with submitted energy statement.</p> <p>Connection to the Elephant Park heating network prior to first occupation.</p> <p>Payment of a financial contribution based on 441.4 tonnes at £95/year</p>	Agreed

	<p>for 30 years = £1,257,990 (indexed) to achieve the zero carbon policy requirement.</p> <p>Allow for an amended energy strategy with improved carbon savings to be submitted for approval, and for the financial contribution to be recalculated accordingly.</p> <p>Require further details of the decarbonisation strategy for the Elephant Park district heat network to be submitted and approved.</p>	
Be Seen – on-going monitoring and post-installation review	Post-construction monitoring and reporting. Review to verify the carbon savings delivered with an upwards only adjustment to the carbon off-set green fund contribution if required.	Agreed
Construction environment management plan	Submission of a CEMP for approval, to include a construction waste management plan, construction logistics management plan, air quality and dust management plan, dust mitigation measures (from the 2020 ES), compliance with non-road mobile machinery low emission zone standards for the CAZ, and the requirements of 2013 s106 agreement for CEMPs relevant to Plot H1.	Agreed
Construction employment and skills	<p>To submit an employment and skills plan for approval before commencement to provide 128 jobs lasting a minimum of 26 weeks for unemployed Southwark residents, 128 short training courses for Southwark residents, and 32 apprenticeships or NVQs.</p> <p>The employment and skills plan shall have regard to the agreed site wide employment and training scheme of the 2013 s106 agreement, and the 2013 paragraphs 9 and 10 obligations.</p> <p>The financial contributions for any shortfalls on these targets would</p>	Agreed

	be set out in the planning obligation, at a rate of £4,300 per job, £150 per course and £1,500 per apprenticeships.	
End use employment and skills	A skills and employment plan to be submitted for approval to provide for 10% FTE business jobs, and 20% FTE retail jobs, and financial contributions for any shortfalls of £4,300 per job.	Agreed
Local procurement	Interventions to ensure small and medium sized local enterprises have access to tender opportunities for the procurement of goods and services during construction and in the completed development, and relate to the requirements of paragraph 11 of the 2013 s106 agreement.	Agreed
Highway works	<p>Section 278 highway works to be submitted for approval, and to be constructed prior to occupation including:</p> <ul style="list-style-type: none"> - Resurfacing of Elephant Road alongside the site. - Installation of a pedestrian and cycle crossing for Walworth Road next to the railway viaduct and associated works to the Elephant Road junction (including provision of a raised table, and reducing clutter), signage and road marking changes (if not already complete pursuant to the OPP s106 highway works). - Renew and upgrade the kerb and footway on Elephant Road and Walworth Road adjacent to the site to the appropriate SSDM materials (granite paving and kerbs). - Construction of a raised entry treatment at the Walworth Road/Deacon Street junction. - Construct the vehicle crossover on Elephant Road to SSDM standards, 	Agreed

	<ul style="list-style-type: none"> - Construct dropped kerbs on Elephant Road and Walworth Road for access to the cycle entrance. - Reconstruct any existing tree pits to SSDM standards. - Upgrade street lighting to current standards. - Repair any construction damage. - To offer area(s) on Elephant Road and Walworth Road to the highway authority for adoption to ensure minimum 2.4m wide footways. <p>Submit for approval the detailed design of Deacon Street between its Walworth Road and Sayer Street junctions, including its road markings and signage to be agreed, with regard for the safety of cyclists. Install the agreed layout of Deacon Street prior to first occupation of H1.</p> <p>The obligation drafting would include a requirement for the highway works required by paragraph 16 of the OPP s106 agreement for phase MP5b to be completed (if they haven't already been completed by the masterplan) prior to first occupation of Plot H1.</p>	
Public realm and routes	<p>Provision of the 0.39ha public realm prior to occupation, and to make a minimum of 0.17ha within the plot (not public highway or Deacon Street highway) available to the public at all time. To comply with the public realm strategy of paragraph 22 of the 2013 s106 agreement.</p> <p>Submission and approval of an estate management plan, which shall have regard to the plan agreed pursuant to the 2013 s106 agreement.</p>	Agreed

	<p>To make the pedestrian routes and cycle route available, to fit in with the paragraph 17 requirement of the 2013 s106 agreement.</p> <p>To lay out 0.02ha of the central park area prior to first occupation, to fit in with the approved park area strategy and paragraph 20 of the 2013 s106 agreement.</p>	
Transport mitigation funding	<p>A financial contribution of £1,721,384 (indexed) to use to fund the train station access improvements project in the first instance. If the project does not progress, the funding would go to the NLTH or other Underground improvements</p> <p>Improvements to the north-bound bus stop on Walworth Road to provide countdown facility = £20,000 (indexed).</p> <p>Bus services contribution of £270,000 (indexed) to be paid in three instalments.</p> <p>Contribution of £120,000 (indexed) towards additional Santander Cycles capacity.</p> <p>Contribution of £12,000 (indexed) for Legible London facilities.</p>	Agreed
Travel plan	<p>To require a travel plan to be submitted for approval, and be compatible with the requirements in the 2013 s106 agreement in paragraph 15. Appointment of a travel plan co-ordinator for at least 6 years from first occupation. To provide the travel plan to occupiers, use reasonable endeavours to comply with the travel plan, monitor and review the travel plan.</p> <p>Three years free Santander cycle hire membership for all eligible occupiers.</p>	Agreed

	No CPZ permits for occupiers.	
Health hub transport operations plan	Submission of further details of the transport operations of a health hub for staff, its functions and patients for approval (if a health hub is to be provided). Such details would include the numbers, locations and swept path drawings for staff parking spaces, health hub vehicle parking, wheelchair staff parking spaces, the route for staff to Plot H1 (and resting points along the way), the provision of ready access for staff through entry doors in Plot H2 at all times, as well as blue badge parking for patients, drop off facilities for the health provider and patients and safe route into the health hub.	Agreed
Delivery and servicing plan	A delivery and servicing plan for approval, including having regard to the approved site-wide servicing management strategy pursuant to paragraph 30 of the 2013 s106 agreement, and requirements to monitor and report. Payment of a DSP bond of £30,245 (indexed) and monitoring fee of £1,600 (indexed).	Agreed
Monitoring fee	2% of financial contributions = £68,027.48	Agreed

429. In the event that an agreement has not been completed by 4 April 2023, 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 legal agreement there is no mechanism in place to mitigate against the adverse impacts of the development (e.g. transport impacts) nor to secure development plan compliance (such as carbon offset contribution, jobs and training, health hub and/or affordable workspace, public access). It is therefore contrary to policies E3 Affordable workspace, E11 Skills and opportunities for all, SI2 Minimising greenhouse gas emissions, T4 Assessing and mitigating transport impacts, D9 Tall buildings and DF1 Delivery of the Plan and Planning Obligations of the London Plan (2021); P17 Tall buildings, P28 Access to employment and training, P31 Affordable workspace, P47 Community uses, P49 Public transport, P50 Highway impacts, P70 Energy, IP2 Transport infrastructure, IP3 CIL and section 106 planning obligations and AV.09 Elephant and Castle Area Vision of the Southwark Plan (2022); and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015 as amended).

Mayoral and borough community infrastructure levy (CIL)

430. 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 2. Southwark’s CIL will provide for infrastructure that supports growth in Southwark.
431. The site is located within Southwark CIL Zone 2 and MCIL2 £60/sqm zone. Based on the floor areas provided in the agent’s revised and GIA Table 3.1 in Planning Statement Addendum December 2021, the gross amount of CIL is approximately £4,100,430.67 consisting £3,801,279.27 of Mayoral CIL and £299,151.40 of Borough CIL. It should be noted that this is an estimate, and the floor areas on approved drawings will be checked when related CIL Assumption of Liability Form is submitted, after planning approval has been obtained. These estimates are on the assumptions that flexible use areas are charged by the use with the highest CIL rate, and that the ancillary areas on the GIA table are treated as ancillary office space.

Other matters

432. Officers have had regarding to the conditions on the 2013 OPP that apply across the masterplan site, to construction phases and to individual plots. Where conditions remain relevant to the development of this plot within the wider masterplan, and a commercial use scheme, these have informed the recommended conditions.
433. The GLA Stage 1 report refers to policies that require the provision of free drinking water in the public realm, and freely accessible public toilets. The park pavilion to the immediate east of the plot will provide a free drinking water fountain for the public realm, and an accessible public toilet will be secured as part of the active lobby, with details to be submitted pursuant to a planning obligation.
434. For the OPP and subsequent RMA applications, the construction phase jobs, skills and employment opportunities for Elephant Park have been calculated by a bespoke method according to the Site Wide Employment and Training Scheme submitted to satisfy the obligations contained in the section 106 agreement of the OPP. This method uses the same formulas as in the Section 106 Planning Obligations and CIL SPD.
435. The applicant proposes to continue this method with the Plot H1 proposal, resulting in a requirement to provide 128 jobs lasting a minimum of 26 weeks for unemployed Southwark residents, 128 short training courses for Southwark residents, and 32 apprenticeships or NVQs. The financial contributions for any shortfalls on these targets would be set out in the planning obligation, at a rate of £4,300 per job, £150 per course and £1,500 per apprenticeships.
436. The council’s local economy team is content with to retain this methodology and request an employment and training scheme is submitted for approval to reflect

the requirements on earlier reserved matters applications for employment and training in respect of the OPP. The local economy team would monitor the new plot as part of the ongoing audit process with BeOnSite, acting for the applicant. This would be secured through a planning obligation on a new s106 agreement for Plot H1.

437. A further obligation relating to opportunities for small and medium sized local enterprises to tender for the procurement of goods and services (in both the construction phase and completed development) would be secured as well, in line with the Section 106 Planning Obligations and CIL SPD. With this planning obligation, the proposal would comply with policy P28 “Access to employment and training” of the Southwark Plan.

Planning balance

438. The topic sections above have identified incidences of harm caused by the proposal, harm which cannot be mitigated through the imposition of planning conditions or obligations. These harms include the losses of daylight and sunlight to nearby residential properties. Some impacts on daylight and sunlight to neighbouring properties would occur with a reasonable redevelopment of this plot, however the reduction in daylight and sunlight levels identified in the assessment are in some instances greater than the OPP illustrative masterplan and the OPP maximum parameters. These impacts, considered in paragraphs 268 to 334 cannot be mitigated, and in order to be reduced would require a substantial redesign of the submitted scheme.
439. The proposal would bring a significant package of planning benefits, including the delivery of key Southwark Plan policies in relation to the Opportunity Area, which should be weighed with the identified harms when reaching a decision on the planning application. The public benefits include:
1. Provision of a substantial quantum of new high-quality office space and the associated jobs to a prominent, brownfield site within the CAZ, Opportunity Area and town centre, and with excellent public transport accessibility. These would contribute towards the borough’s targets in the Southwark Plan for employment space, jobs and retail space in Elephant and Castle. The additional staff with their spending would help support the shops, services and businesses in the area.
 2. Provision of a health hub for the NHS or similar public health operator which would address a long-term need for improved health facilities in this area, and be of benefit to the local community.
 3. If a health hub is not progressed, the proposal would provide affordable workspaces targeted for the types of businesses interested in such space in Elephant and Castle, at reduced rents. This would support small businesses.
 4. The construction phase of the development would provide jobs and training opportunities, including for unemployed borough residents.
 5. The completed phase would provide jobs, including jobs and training for unemployed borough residents.
 6. The construction and end use phases would provide local procurement opportunities for local businesses.
 7. The proposed development would provide 0.39 hectares of landscaped

public realm at ground level with urban greening measures, improving existing public highways, improving connectivity around the plot, and through the off-site highway works would improve the pedestrian environment.

8. Provision of a public lobby area of at least 500sqm with seating, free wifi access and toilet provision, for the local community to use to work and meet.
 9. The payment of Mayoral CIL (to be used by the Mayor of London for Crossrail 2 as a strategic transport project for the city) and borough CIL.
 10. The financial contributions for transport improvements are related to the impacts of this development but the full projects that these contributions would part-fund would also be of benefit to the area, e.g. the Northern Line Ticket Hall, train station improvements and increased cycle docking station capacity which would improve sustainable transport modes and station accessibility.
440. Officers are of the opinion that this scheme would help to deliver key aspects of the Southwark Plan and that the proposal's compliance with development plan policies in most topics, and the public benefits arising, are sufficient to outweigh the incidences of harm to neighbour amenity that cannot be mitigated. The application is therefore recommended for approval.

Community involvement and engagement

441. A Statement of Community Involvement (SCI) and a completed Development Consultation Charter template were provided with the application, and a short addendum was provided with the December 2021 revisions.
442. At pre-application stage the applicant held two rounds of community consultation, firstly on the initial designs (August to December 2020) and secondly on the proposed designs (January to February 2021). Due to the pandemic and changing restrictions at this time, the applicant used a dedicated online consultation platform, which was advertised by 12,000 flyers, posters on the site hoarding, e-flyers set to community and business stakeholders, and a pop-up consultation in the reception foyer of Plot H2. One-to-one online meetings were offered too.
443. In terms of engagement, the applicant's online consultation platform was visited 2,810 times between August 2020 and February 2021, 194 feedback forms were received, and seven online one-to-one meetings held. Stakeholders included: Elephant Park residents, The Walworth Society, Southwark Cyclists, Southwark Business Forum, London South Bank University, London College of Communication, The Elephant and Castle Partnership, Southwark Living Streets and Southwark Chamber of Commerce. The applicant team also met with ward councillors and cabinet members about Elephant Park where Plot H1 was included on the agenda.
444. The responses the applicant received to the pre-application engagement included the following topics:
- The change of use from a residential-led development in the OPP to a commercial-led scheme.

- How the design proposals respond to the Elephant Park masterplan.
- How to encourage community use of the publicly accessible ground floor lobby.
- Exploring further public benefits the project could provide.
- The height and massing.
- References to local history and heritage.
- The relationship to the park, Castle Square and Walworth Road.
- Construction logistics and minimising disturbance to residents.
- The public realm and inclusion of greenery.
- The servicing yard entrance.
- Impacts on residential amenity, particularly to Plot H2 neighbours.
- The type and size of businesses expected to occupy the commercial space.

445. The applicant responded to the feedback in the following ways:

- Incorporating a potential health hub within Plot H1.
- The publicly accessible ground floor lobby will be open every day, with free public wifi, phone charging points and seating in the active lobby.
- Changing the colour palette of the fins to add visual interest.
- Including further vertical greening on the columns and further planting.
- Introducing a curved ground floor façade reflective of the Victorian bay shopfronts, and including historical references inspired by local Victorian shopfronts.

446. The applicant has aimed to respond also to the feedback made in earlier consultation events over the past 10 years of Elephant Park reserved matters by such measures as proposing no parking spaces (other than accessible parking), servicing within the plot, references to local heritage, and active ground floor frontages.

447. The applicant held a further round of consultation once the application had been submitted to the council. This involved a pop-up event on Sayer Street which was advertised to those who had been involved prior to the submission, with visuals and booklets explaining the key features, and directing people to the planning register. The project website was also updated.

448. Formal pre-application discussions were held with the planning division (ref. 19/EQ/0199). The applicant held separate pre-application discussions with the GLA, TfL and Historic England. The pre-application scheme was presented to the Design Review Panel. The council's response letter has been uploaded to the planning register with this planning application.

449. On receipt of the planning application, the council consulted by sending letters, putting up site notices and a newspaper advert. The responses received from members of the public, local groups, external consultees and internal consultees are summarised in the section below. Over 430 objections were received and more than 50 comments in support in the first consultation.

450. In the Stage 1 report, the GLA noted that the applicant's Statement of Community Involvement and Development Consultation Charter summary demonstrates "a

full and transparent consultation has occurred with identified direct engagement and consultation events, in accordance with the principles set out in the Mayor's Good Practice Guide to Estate Regeneration". In response to another comment in the Stage 1 report, a statement of equality impacts was provided by the applicant, which considers the equality effects arising from the proposal, the prevalence of groups with protected characteristics in the area (comparing the local wards, the borough, London and England), how the groups may experience disproportionate and/or differential equality impacts from the proposal, what the predicted impacts are, and then a summary of whether these impacts are positive, neutral or negative for different protected groups. This is summarised in the later community impact and equalities assessment topic section.

451. Further consultation was undertaken between December 2021 to January 2022 on receipt of the amendments, with letters, site notice and newspaper advert. The applicant provided a short SCI update in December 2021 on how it has amended the massing and façade design in response to the feedback on the massing. 39 objections and two comments in support were received to the re-consultation. The further responses received are also set out below in the re-consultation sections.

Consultation responses from members of the public and local groups

452. **Walworth Society** – objects, raising seven topic areas:
- 1) This application represents a change to the consented masterplan and significantly undermines it. The masterplan was developed following systematic engagement with local people and this application negates that work in favour of a greedy last-gasp desire to provide office space which is far less needed in Southwark than the council homes which could be delivered instead. Plot H1 was the smallest plot, with its massing designed with input from the community; the current proposal is far larger, lumpy, overbearing and contrary to the fine grained buildings on the opposite side of Walworth Road.
453. 2) The community engagement has ignored the views of the Society and local residents to the change of use and the design.
454. 3) The case for office space is not proven, especially with office space approved at Skipton House and the old town hall, and increased working from home. All too clear is the need for council homes in the borough. The council should buy the site to build housing and increase the size of the park given the shortage of green spaces in the area.
455. 4) The design of H1 is greedy and over-bearing, of poor quality and unsuited to this key location at the north end of the Walworth Road. Double the consented volume, without separate blocks to integrate with the scale and rhythm of Walworth Road. Support the comments of the DRP that it is overly bulky, deep plan and lacks detailed articulation. It will have a detrimental effect on the generally positive design of Elephant Park so far.
It fails to make any positive contribution to the landscape, and is not an appropriate landmark as the design is overbearing, greedy, uncontextual and introverted. The concept is limp and does no justice to Michael Faraday. The

quality of the office space is mediocre and dark at its centre because the plan is too deep. The caged private balconies have greenery which, if it grows, will impede light and views to the park. The over-scaled 10-metre high lobby bears no relationship to any other building on the Walworth Road. It relies on large areas of blank façade on Walworth Road and Deacon Street, and the north-facing facade upon which greenery will magically grow. The building and its users are completely orientated to the south-east, to the tube and to Elephant Park, demoting Walworth's high street to a back street.

The building design is particularly detrimental to the setting of the Walworth Road and in particular the historic terrace nos. 82-96 Walworth Road identified as worthy of local listing. The proposal will dominate these buildings and bears no relationship to them as a piece of high-quality streetscape. Fails to accord with Southwark Plan tall building policy.

The original masterplan was drawn up following an in-depth consultation with many local groups and residents, with working groups, sets of architects to establish a number of guidelines for the new north end of the Walworth Road (e.g. continuation of the "historic high street", single storey ground floor heights and vertical elements which set out to mimic the rhythm of the historic high street). These guidelines have been ignored in this proposal, so that it fails at street level. The Walworth Road elevation is 10m high, almost three storeys with a blank and underused frontage for a whole block of the Walworth Road adjacent to the dark undercroft of the railway bridge. The elevation of Deacon Street is worse still, dominated by entrances to back of house facilities, a completely blank 10m high façade to a building that is over 40m long, with three small windows at one end. This building and its users completely will, by design, completely turn their backs on this section of the Walworth Road, making it a dreary, dark, and potentially dangerous canyon. This is contrary to the NSP Vision for Walworth in terms of encouraging a flow of people south from the Elephant and Castle to Walworth improving the connections of neighbourhoods and communities across Walworth Road and improving the retail and service offer of Walworth Road. Many of the design proposals are shown from Elephant Park rather than Walworth Road, indicating the cues are taken from the park than the highway street.

456. 5) Owing to its height, massing and the poor quality of the design, the development is detrimental to and causes harm to the Pullens Conservation Area, the Walworth Road Conservation Area and to the nearby grade II listed buildings (Southwark municipal offices (Walworth Town Hall), library and clinic buildings on Walworth Road and nos. 140, 142, 150 and 152 Walworth Road).
457. 6) It does nothing to contribute to creating a safe Walworth Road and create links between the Elephant and Castle and Walworth. It and the wider Elephant Park development more generally fails to create a safe environment for people in West Walworth to cross to Elephant Park, despite a requirement to create high quality walking and cycling conditions. Lack of integration of a pedestrian crossing and other Lendlease developments along the Walworth Road to fit with AV.16 The Walworth area vision and to "Improve cycling and walking routes" and to support walking and cycling. The traffic impacts that will come with operating a large office space will be material. Walworth Road in its northern extent is overwide which encourages fast driving. An opportunity to create a safe northern part of Walworth Road with a crossing

to the new developments. A condition should be a contribution to the redesign of the northern part of the Walworth Road as a safe boulevard.

458. 7) It will have a detrimental impact on Elephant Park, neighbouring residents and biodiversity across the area. There is no separation of the tall structure on H1 and the neighbouring buildings (as there was in the outline permission), and will have severe negative impacts on almost all neighbouring buildings. It will dominate views and reduce sunlight in Elephant Park, a park which is important in the overall development. The wider community who use the park will feel the impact of the massing. Removal of approved trees will have a negative impact on biodiversity.

459. **35% Campaign** – objects, the key topics of objection are summarised as follows:

460. 1) The loss of housing

The OPP would be superseded, which approved the principal land use of Plot H1 as residential with only potential for business. The applicant gives no figure for how many homes could be delivered in Plot H1 under the OPP (could be about 340 homes). The proposed office floorspace is 10 times the maximum business floorspace allowed for the whole masterplan, and double the business floorspace envisaged for the Elephant and Castle Opportunity Area by the Core Strategy, and reiterated by the Elephant and Castle SPD, which remain the adopted policy. While the applicant claims it has fulfilled the OPP housing and affordable housing obligations, allowing non-residential land use for H1, the OPP remains a material consideration (under the OPP the *'principal use'* of Plot H1 is residential, with only a *'potential for business'*). The loss of the housing due from Plot H1 under the OPP is a material consideration.

461. 2) The London Plan – brownfield sites

As a brownfield site, Plot H1 should be used to optimise housing delivery, according to the London Plan and its policy H1. Policy H1B2 says that boroughs should *"optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions especially the following sources of capacity: a) sites with existing or planned public access levels (PTALS) 3-6"*. Plot H1 has a PTAL 6b rating.

462. 3) The London Plan – public land

London Plan policy H1B2d says that housing delivery should be optimised where there is redevelopment of 'public sector owned sites'. While Plot H1 is no longer publicly-owned the whole OPP site was sold to the applicant out of the public sector, and the OPP was granted on the basis that the principal land use for 11 of the 13 plots was residential. The Mayor also *'expects that residential proposals on public land should deliver at least 50 per cent affordable housing on each site'*. The residential development of Plot H1 would allow, with the benefit of an updated viability assessment, a greater proportion of the housing to be delivered as affordable, towards the 50% expected, while a non-residential development represents a greater lost opportunity for more affordable housing. The 35% Campaign would contradict any argument that the amount of housing has already been optimised under the OPP, excluding Plot H1. The application is a standalone application, seeking full planning permission, and separate from the OPP. The application is therefore separately subject to the London Plan and should be considered on its own merits.

463. 4) Estate regeneration consultation
The submitted Statement of Community Involvement details the local consultation for Plot H1. Other relevant consultations to be considered before determining the application are those which took place with the residents of the Heygate Estate, prior to its demolition and the consultation for the OPP. These consultations did not contain any proposals for a large free-standing office block.
464. 5) Density and size
Under the OPP Plot H1 was to have 22,491-36,100sqm GEA of total floorspace. The applicant wishes to nearly double this to 64,624sqm, creating an excessively large and overbearing structure. The GLA Stage 1 report raised concerns about the impact of the building on the World Heritage Site and locally listed heritage assets.
465. 6) Meeting affordable housing targets
The applicant notes that the employment target for providing office space has been increased for the borough and that this application is being brought forward in response. However, the housing target for the borough has also been increased and now stands at 2,355 new homes per annum (in the NSP Main Modifications). The council has produced a Housing Delivery Action Plan, due to 3 years of 'undelivery', requiring a 20% buffer in the NSP's land supply. Delivering Plot H1 as a residential development would go towards meeting Southwark's housing targets. The applicant has chosen to optimise the delivery of housing across the other plots within Elephant Park 'in response to market trends', but this has been done this by squeezing the total consented homes into fewer plots, creating a 'spare' plot. It is the applicant's choice to use this for non-residential use, but it does not follow that the council is bound to grant them a permission for a different land use. The council should consider Plot H1 as a 'windfall site', delivering more housing and more affordable housing unexpectedly, for which there is a housing allowance under the NSP. If this application is rejected, the applicant will retain the OPP for Plot H1, with only residual 1,986 sqm of residential floorspace. Nothing prevents the applicant from making a new application for a residential development in accordance with the priority land use under the OPP.
466. **Public comments in objection** – 431 objections were received, raising the following summarised topics.
467. Principle of development
- Development needs to stop, it is unnecessary. There are enough buildings. Stop building to hit targets.
 - Overdevelopment. The density is too high.
 - This plot should not be developed. The project should be abandoned.
 - This is a change from the approved masterplan and undermines the masterplan which was developed with community engagement.
 - No justification to change from the original masterplan – there is no increased demand for office space since 2012, nor has the need for housing decreased.
 - Ignores the needs and priorities of the existing residents.
 - Gentrification of the area. Destruction of the community over the last 10 years.

- Conflict with local plan.
- Given the profit already made on the Elephant Park this site should be given to the council to develop council housing.

468. Office use

- No need for office space after the pandemic with the change in working patterns and most office workers continuing to work from home. Offices will soon be obsolete with so many working from home. There is too much office space in the current economic situation. No need for a statement, corporate office building. Giant offices are a thing of the past. Likely the plot will remain empty as the demand for office space is unclear.
- Plenty of empty office space in central London and Southwark already, and empty office space in E&C that is hard to let and being converted to residential. Already new offices at Skipton House and the Old Town Hall to provide enough office space in E&C. It will sit empty if companies are not looking for more office space.
- Offices do not benefit the population. It will not support growth nor the local community. Office jobs will not be for local people. Offices don't bring any local jobs as they generally companies moving from elsewhere.
- The area works well without offices.
- Offices don't create communities.
- The costs of having thousands of office workers outweigh any benefits for the Opportunity Area.
- All office space should be removed from the regeneration of a wonderful residential area.
- Office use will change/harm the neighbourhood character of the mainly residential area. It will bring city-looking chains and office workers and ruin what little local life remains in Elephant Road. Contradicts the developer's marketing material for the new park and residential area.
- Proposing ten times the maximum amount of business floorspace allowed by the OPP for the whole site. It is double the 25,000-30,000 sqm of business floorspace envisaged for the Opportunity Area by the Core Strategy, and reiterated by the Elephant and Castle SPD, which remain the adopted policy.
- Many other sites better suited for office redevelopment in the area. Regenerate existing empty office sites instead of this site.
- Need to encourage local business rather than another office block.
- The range of uses requested is very vague and need to be clarified.
- It will be empty in the evenings and weekends.
- It will change the culture and spirit of the local area, having a disproportionate effect on local amenities in the area and squeezing residents out. High end offices will raise property prices and push out families.
- One comment that supports office but the size of the building and loss of light would outweigh the benefit.

469. Should be housing or another use instead

- The plot should be kept as residential use (as approved in the OPP), not removing residential use from the city. This is a residential area and the site should be used for housing. If Lendlease has provided all the approved residential space of the OPP, then this plot should be used for additional

affordable housing.

- The greatest need is for housing (especially affordable) and will always be a need for housing especially when many office workers will continue to work from home, and there is a homelessness crisis. Southwark is desperate for affordable housing and desperate for land to build on. This prime site should not be used for an office block.
- This brownfield site is on the council's brownfield register and should be used to optimise housing delivery, as required by London Plan policy H1, part B2.
- Loss of the approved housing in the OPP. The plot could provide around 340 homes based on the density of Plot H7. Or a compromise with mix of homes and a few storeys of office could be provided instead.
- The London Plan 'expects that residential proposals on public land should deliver at least 50 per cent affordable housing on each site'. The residential development of Plot H1 would allow with an updated viability assessment, a greater proportion of the housing to be delivered as affordable, towards the 50% expected, while a non-residential development represents a greater lost opportunity for more affordable housing.
- Lendlease has only delivered 25% affordable housing on Elephant Park, when it should have been at least 35% and the Mayor now requires 50% on publicly owned land. Lendlease has not provided the original amount of affordable housing promised. 1,200 Heygate residents were moved out, only 100 social rent homes will be built to replace the number demolished; residents were not told they were moving out for an office to be built. All residents decanted from the Heygate Estate should be offered a home in the same tenure as before; until then, no uses other than residential should be allowed. Former Heygate tenants have already lost out much on what was promised to local residents but reneged on. Southwark households do not have incomes to affect even the cheapest homes in Elephant Park. Continuing to remove residents from the area, and residents are being priced out by Lendlease's development.
- The need for social housing has never been more acute. Lendlease has not met its social housing commitments. The site was social homes and should be used for affordable housing. The council sold off this council housing land to a private developer; affordable homes should be built. The proposal will do nothing to help the council's housing list.
- A perfect location for the council New Homes (instead of green spaces across the borough). That would turn a tragedy of social cleansing and demolitions, and memorialise the lessons learnt into a bold tower of council homes – a symbolic repair and modestly corrective beacon of justice, instead of deepening the original crime. The council needs to change its “no alternative” approach and “build on failure” to take this opportunity to do the right thing.
- This application will heighten the housing crisis, on the “graves” of council homes needlessly demolished and forcing infill on housing estates across the borough.
- The site should be use for 3-4 storey housing instead.
- Should be used to build something useful that has a point instead of corporate rent and shareholders. People won't visit an office, it needs to be something more interesting, like the Artworks that was there before.
- It should be a school, community centre, GP, or other infrastructure that

the community needs. The promised community and leisure space has not been built. It could be community space, and perhaps a small theatre, a cinema and a space that focuses on children and their needs.

- The plot must be used to meet the local community's real needs, including affordable housing, with all the amenities and open spaces (to give a breath of air to an over-densely developed section of the borough) needed to make life liveable in London.

470. Height, size, design and heritage

- The change in scale from the masterplan will be overbearing, and an overdevelopment compared with the approved, smaller blocks for this plot. The masterplan was designed with extensive community input, to ensure the buildings connected with the scale of Walworth Road and other buildings nearby. The current proposal rejects that in a greedy, overbearing and poor quality building with 10m high ground floor (unlike any other building in the area) and that does not carefully blend with the street level context, material and scale.
- The size and proportions are much too large, and far larger than approved. Far more voluminous and higher than the approved plan. So much larger than the consented building for this plot. An office building larger than any other in the masterplan. This will be the largest plot by floorspace, and second tallest in Elephant Park. One building filling the whole block would be unique in the masterplan and the area.
- It is too high. Already too many tall buildings adjacent to Castle Square, the park and in the area. It will create an oppressive and suffocating environment. The height and size should be kept within the approved parameters, not consolidated into one taller mass.
- Size, bulk and massing are excessive, out of keeping and proportion with the character of the Elephant Park development and current nearby residential properties.
- Out of keeping with character of area in size, use and function. Neither fitting with the old or new buildings. Harming the character of the area, Walworth Road and the cityscape. Taking the heart and character out of the area. Out of character with the cluster of narrow tall buildings around Elephant Park. Other Elephant Park buildings have a harmony and synergy that this proposal would significantly disrupt.
- Harm to the visual amenity of the area, overbearing, with dwarf the area. The building takes up too much of the plot area and needs to be set back. Squashed into a small space. Too close to the roads.
- Poor quality design. Hideous. Ugly. Monolithic. Unflattering. An eyesore. The design makes no sense. A single enormous shapeless blob. Looks dated already. The orange will age. A blot on the landscape. A destructive design. The experimental architecture is not suited for a key location on Walworth Road. Removed the ugly Heygate Estate buildings only to replace it with another ugly building. Repeating the same mistakes. No link with local history in the building's design – if the older generation, market traders and young people brought up in the area had been consulted it would have been different.
- Domineering impact and harm to Walworth Road Conservation Area, Pullens Conservation Area and listed buildings. The townscape assessment does not include a study from within the Newington Estate/Hampton Street nor from the south-west from Kennington Park

Road.

- The wall facing Castle Square is unappealing. It will dwarf Castle Square from the Walworth Road.
- The office entrance and retail units should face onto the park to activate this edge of the park that will otherwise be killed with the current extra-large office lobby.
- Not complying with tall building policy as no public space is provided at/near the top of the proposal. Ground floor reception is not an acceptable substitute.
- Contrary to the design requirements of the NPPF, National Design Guide, Southwark Plan, draft NSP, Elephant and Castle OAPF.

471. Neighbour amenity

- Harm to quality of life of nearby residents. Harm to neighbour amenity from the increased height and massing of the plot.
- Too close to adjoining properties. Overbearing, out of scale and dominant massing.
- Loss of privacy, overlooking from the many windows and balconies to existing and future residents. Residents are working from home more often, meaning they will be overlooked more. Local residents will experience a significant reduction in their right to private enjoyment of their privacy.
- Loss of light. The submitted daylight and sunlight report uses the BRE tests and shows a number of windows and rooms would fall below the BRE recommendations. Neighbours currently have good daylight and sunlight looking over the empty site so the suggested "existing" levels are likely to be higher than reported. The impacts go beyond those of the approved outline permission's massing. The loss of light presented in the application is compared to the "maximum allowed envelope" which the new building is exceeding, so the daylight loss is much higher and more significant.
- Loss of light to Plot H2 being a massive wall blocking the little light the neighbours receive. These plans do not do enough to minimise the daylight loss. The height should be pushed away from the Plot H2 side and towards the station instead.
- Loss of light to Strata. The affected units face only to the Plot H1 site – they have no alternative windows. Harm to Strata residents' quality of life, especially the lower floors which are the affordable units where vulnerable people live.
- It cannot be reasonable for the rights of a large office block to take precedent over the wellbeing of residents - many of whom will realistically be using kitchens and bedroom as living spaces and home offices. It's offensive to suggest the 'transient' nature of students somehow makes their residence and well being less important.
- Security staff and technology are needed for after-work revellers and to prevent anti-social behaviour that residents will witness, and affect their safety.
- Noise and dust from construction. Noise and disturbance from office use in a residential area.
- Glare from the sun on the glazed facades during the day.
- Light pollution from the office lights being on at night, disrupting neighbours' sleep.

- Promoting inequality as the higher flats would be affected less than the more affordable lower flats in H2 and Strata.
- Developer needs to be more considerate of existing neighbours (their needs and wishes) and revert to the original plan.
- Contradicting the information on which neighbours bought their flats that look onto the site.
- Loss of views.

472. Park, open space and ecology

- The plot should be used to extend the public park. More open space is needed, not less. Building over the promised park before it is even finished. Shouldn't lose rare, green spaces for development that are vital to health and wellbeing, provide access to nature, and help tackle climate change.
- E&C was already deficient in public open space in 2013 when Southwark's Open Space Survey was completed. Since then thousands of homes have been built, and while Elephant Park incorporates an element of public open space, it is in no way sufficient to compensate for all the extra development.
- Harming the open space. Looming effect over the park. Harmful impact to the character of the park, which would be enclosed by high buildings. It will undermine the positive addition of Elephant Park to the local area by overshadowing and enclosing this wonderful new green space. It will ruin the new park that brings the community together, and bring health, wellbeing and environmental benefits.
- The park will be overpowered by thousands of workers, ruining its utility, value and the experience. The park is already packed on sunny days (even with the masterplan not fully completed) and is the minimal space needed for new residents.
- Loss of sunlight to Castle Square and the park especially in the afternoons when the park is most used. It will overshadow the new park in the afternoon and evening; this plot on the south-western side of the park is a vital breathing space. Harm to the flora and fauna.
- Further improvements to the quality of the public realm are needed.
- Harm to the mature trees on Walworth Road as the building is so close.
- Loss of the wildflower meadow. It should be kept. It is used by pollinating insects and appreciated by the community.
- Affect local ecology.
- No mention of maintaining the outdoor green spaces in good condition.

473. Transport and highways

- It does not contribute to creating a safe Walworth Road and create links between the E&C and Walworth. It and the wider Elephant Park development more generally fails to create a safe environment for people in West Walworth to cross to Elephant Park.
- Increase in traffic from a transient office population. It will make traffic in a congested area and on Walworth Road (one of the busiest roads in the borough) materially worse. Thousands of extra people will lead to congestion in the area and in the park which is too small for current needs.
- Inadequate parking provision
- Question why car parking is being included in a central location with

excellent transport links.

- Inadequate public transport; bus, tube and train services are already overcrowded.
- Increase in pollution.

474. Community impacts

- Strain on existing community facilities. Office works don't connect with local life, but take resources without giving back.
- Safety impact of an empty office building at night, next to the station. No benefits for Elephant Park residents, no access to the terraces despite paying service charges.
- Elephant Park is not achieving the required environmental standard, does not allow for electric vehicle charging points, does not include solar panels, a children's nursery or school, or facilities for the elderly.

475. Environmental impacts

- Potentially contaminated land.
- Increased risk of flooding.
- The proposal does not meet the zero carbon commitment of the council and its climate emergency announcement.
- The materials are not sustainable.
- A more ecological design is needed.
- It will overheat in the summer and require a huge amount of energy to cool.
- The streets are windy and never receive sunlight. Already wind issues in the area which this proposal will worsen, making it dangerous to walk on the surrounding streets, and will prevent disabled and elderly people from leaving their homes due to the strong ground level winds.
- Overshadowing Walworth Road. The railway bridge is already dark, and will become darker at a dangerous junction.
- Lack of planning commitments: The site needs a lot more greening and real spaces that benefit the public.

476. Consultation and lack of community involvement

- The Statement of Community Involvement details local consultation for Plot H1. However, other relevant consultations which took place with the residents of the Heygate Estate, prior to the demolition of the estate and the consultation for the OPP. These consultations did not contain any proposals for a large free-standing office block.
- There has been no engagement with the local community.
- Disrespectful of the applicant to dismiss the comments made by the community during pre-application consultation.
- Poor consultation by Lendlease and the council at this late stage.
- Lendlease keeps changing its mind, back-tracking and renegeing on original commitments after people have purchased properties based on marketing material that is now superseded.
- Back tracking on the original planning promises. People bought their flats (in Strata and Elephant Park) relying on the massing of the approved block. They will experience financial loss with the reduced value of their properties.

477. Other comments raised by objectors

- It is not providing anything for the youth in the area.
- Loss of retail space for local traders.
- It will contribute to the gentrification of the area.
- The increase size and the office use are greed; the residents should take priority. Public and resident rights to clear sunshine in the park must be upheld.
- Approving this will show the council doesn't care about objections and the harm it will cause. Another sign of council corruption.
- Not enough information on the application, missing information.
- Questioning who will benefit from the rents, that the money won't go into the local economy.
- This is part of the ongoing process whereby the E&C is given over to international property developers who wish to maximise the profit they can get from the wealthy. It addresses none of the needs of the existing population nor that of London in general.
- Expense of upkeep and cleaning the façades, and will be made harder for the surrounding buildings.

478. A letter in support was received from **NHS South East London Clinical Commissioning Group (CCG)** commenting that:

- The CCG supports the redevelopment of the site and the provision of healthcare floor space and would like to ensure development is brought forward sensitively with regards to the CCG's assets and operations. It raises no objection to the application in principle and seeks to work collaboratively with Lendlease.
- Covid has highlighted health inequalities across south-east London, council regeneration and associated population growth is predominantly in the north half of the borough and associated neighbourhoods – these are the CCG's areas of greatest need.
- The CCG looks forward to working collaboratively with primary care, secondary care, and other health care providers to further develop primary care commissioning and out of hospital health hubs in Elephant & Castle as outlined in the SEL Estates Strategy. It is working with partners across the system to facilitate the right mix of health and social care and voluntary services to address health inequalities and provide access to appropriate services.

479. **Guy's and St Thomas' NHS Foundation Trust** - supports the redevelopment of the site and the provision of healthcare floorspace however, the Trust would like to ensure that the development is brought forward sensitively with regard to its assets and operations.

- The Trust supports the reference of a healthcare facility within the New Southwark Plan and welcomes the provision of healthcare floorspace within the proposal. The provision of healthcare in the Elephant and Castle Area Vision will be a positive addition to the area. However, the Trust requests that the provision of healthcare floorspace is secured and is not part of the flexible floorspace proposed. The redevelopment of the area will significantly increase the number of residents and users in the area, which in turn will increase demand and strain on existing healthcare services. Therefore, it is vital that the healthcare floorspace is secured.
- The Trust supports the provision of healthcare facility on the ground and

mezzanine floors as it will ensure that the healthcare facility is able to be accessed by all members of the public.

- Requests to be consulted during the decision of any potential healthcare occupier.
- Supports car-free development and the provision of cycle spaces to encourage healthy lifestyles for future users.
- Requests that any assessment of transport impacts during construction and operation takes account of emergency vehicles and the need to ensure that there is a consistent and easy access to NHS locations. The Trust also requests that the Applicant to notify emergency services regarding planned closures and diversions of either roads or footpaths.

480. **Public responses in support** – 53 responses were received from the public in support of the proposal (including 10 from overseas). These made the following summarised points.

481. Principle of development and the uses

- This plot is part of the masterplan not the park, and so can be developed.
- The proposed office accommodation will positively contribute to the E&C Opportunity Area. It would meet London Plan objectives by providing employment space in a high accessible location next to the stations, provide a huge number of customers to Elephant Park and Walworth Road to support local businesses.
- An office will contribute to the local economy, provide jobs, and bring people in to spend money in the area. Office use would support local businesses, bring increased footfall and spending in shops. Offices are a typical part of London where business is conducted, and needed for the residents of new buildings. Offices are seeing a return to relatively normal working patterns.
- There little decent commercial space in the area. The current office stock is dated, and high performing, modern offices are a key requirement for modern users in a (post)pandemic world. It will encourage investment into transport and driving E&C as a destination, rather than a predominantly residential area.
- It would add to a mix of uses in the masterplan, bringing a mix of people through the day (and midweek) and spaces that can co-exist and support each other. It will make a successful residential district even more lively, and balance the residential developments. More sustainable for people to live and work in the same area.
- A health centre would support the increased population in the area. Permission should require the fitting out with new accessible facilities.
- The affordable workspace will help meet the needs of a range of small businesses and start-ups in the local area.
- Retail space has been lost with the closure of the Shopping Centre, and Lendlease's engagement with a variety of retailers should be encouraged.
- The atrium would be well-used by the public. The lobby delivers an immediate, tangible benefit to residents of the local area and creates an interesting entrance point into the estate. This part of the design supports the changing working patterns and provides a welcome respite for those who work from home as well as a place to meet and relax. The ground floor level contributes to the community of the area providing potentially some very useful facilities.

- The ground floor space needs to be prioritised for community uses where people can access workshop facilities for starting new businesses and learning new skills; local business incubator and affordable office space is needed for local people.
- Opportunity to provide jobs for local people, and those made unemployed during the pandemic.
- Urge the council to see through its vision of regenerating the E&C area, with inspired design and job creating opportunities.
- The final phase of Elephant Park right next to the station should deliver the pinnacle, and not some bland social housing.
- The council did not approve the demolition of unattractive housing blocks just to bow to pressure and revert to same old housing blocks.
- The plot is not ideal for residential building and would potentially provide useful office space for local residents.

482. Design and height

- The height is appropriate for its location, context of other buildings in the area and those approved at the Shopping Centre, and being close to transport links, not dramatically different to the original plans.
- The design looks good, interesting, better than others approved in the area, references the railway lines in the area. It will be a new architectural landmark rather than a basic/standard design.
- Striking design is exactly what is needed to set an inspiration for the regeneration of the area.
- The building also appears innovative and importantly looks good in the context of existing buildings and landscape
- Appreciate the ambitious nature of the design - a landmark, architecturally distinct building will elevate the character of the area whilst the building's materiality and greening responds well to its immediate surroundings.
- The height would not harm the landscape or cause much overshadowing.
- Looks like a well thought-out and well designed building. The planted terraces step back and the lattice structure are attractive.
- The building is innovative and looks good in the context of existing buildings and landscape.
- There is demand for offices that have well-being amenities (outside space, cycle facilities).
- One comment that it is bulky, with cut sunlight and should be reduced in size.

483. Public realm, landscaping, urban greening

- The idea of a decent attractive workspace with new employment, placed next to a new park, new retail, new residential and great transport links - all fits into the concept of the 15 minute city and a sustainable way of living.
- Public realm improvements which will help to provide enhanced pedestrian connectivity between the Shopping Centre site and the Elephant Park masterplan.
- Strong focus on urban greening, low embodied carbon and quality public spaces at ground level which is needed in a locale that was dominated by a Shopping Centre and multi-lane roundabout.
- Only temporary landscaping being lost, not permanent park.

- Elephant Park benefits the public with London needing more open spaces that benefit the city. E&C was once a concrete jungle, and the development plans are an opportunity to build back better for everyone's benefit.
- It would continue the good quality of the park by continuing the lush planting, with a mix of plants for year-round interest.
- Benefit to the public realm and Lendlease has shown they can create spaces which benefit a community.

484. Transport

- A sustainable location close to transport hubs.
- It would connect Walworth and E&C.
- Stations need to be made accessible and Lendlease should be required to pay for these improvements.

485. Other comments in support

- Elephant Park is a hugely impressive development. The regeneration of the local area has been respectful to the local community but greatly enhanced the neighbourhood. Lendlease have done a fantastic job in delivering the first phases.
- Objectors have not understood where the site is, and most of the site is not temporary park.
- The council needs to secure more benefits from Lendlease.

486. 2 neutral comments were received that:

- It is a good design however it risks blocking the light into Elephant Park.
- More office space is not the priority for London, instead any space should be committed to building homes for those on waiting lists.

Re-consultation responses from members of the public and local groups

487. **Walworth Society** – notes the revisions and continues to object to it. These revisions in no way address the fundamental concerns that the development runs contrary to planning policy (set out in the original objection) and trusts that the objections that the Society and many parties submitted are in no way negated by what are in fact very minor adjustments to this application.

488. **Southwark Law Centre (SLC)** – provided three letters of objection. In the first, SLC comments that the applicant has suggested the proposal can be provided without prejudicing the OPP, however the SLC does not understand how all of the OPP obligations have been met on the information provided. SLC asked a series of questions regarding the affordable housing, affordable retail provision, community space, and health facility. SLC states that a matter of real concern is that it is now clear that a number of main modifications to the now adopted Southwark Plan were aimed at supporting this development, and SLC believe this formulation of policy and the evidence supporting it must be explained in consideration of this application so that the balance of material considerations can be judged given the demand for social housing and affordable workspace in Southwark and the existing requirement of the OPP s106 for a health hub. Also a material consideration is the “exceptional circumstances” in which the

development can disapply the affordable workspace policy P31.

489. **The second objection letter from SLC** set out its concerns that the Plot H1 application may come before Committee without a further period of consultation on matters which are material considerations. SLC requested a further period of consultation with detailed information about the reconciliation of the masterplan, and details of a consultation from the CCG on the provision of health services in area. SLC's concerns are summarised as:

- This is a planning application of particular community interest as it is for the last plot and it is expected to be accompanied with accurate and complete information show how everything to be provided under the OPP and its section 106 agreement has been provided.
- The reconciliation statement contains incomplete information on affordable retail space. It does not contain clear information about the amount of homes provided, including affordable homes and social housing which is only detailed in habitable rooms. There is no information about levels of occupation.
- A lack of clear, correct and up to date information about the community space provision and whether this requirement has been discharged.
- Insufficient information about the money provided for health facilities under the OPP and how it has been used. It should be used for a health facility and it is unclear as to why it is being provided in a separate application for an office block outside the masterplan.
- Insufficient information provided about the health hub facility. The memorandum between Lendlease, the council and CCG provides more detail about the plans for a health hub which is likely to eventually replace Princess Street and Manor Place surgeries in Walworth. This has only been presented as an option in previous documents, but it is now presented as a final proposal. This is a huge potential change and inadequate details have been given about how this is proposed to work and interact with the current local health provision. Any proposed change to health provision in the wider area should be consulted on in as much detail as possible.

490. **The third objection letter from SLC** set out in more detail the areas where SLC does not consider compliance with the OPP planning obligations has been demonstrated. This application marks a significant change of direction from the OPP. Lendlease asserts that it has met all its OPP obligations, including affordable housing, community use and affordable retail. SLC has concerns about this assertion and about the design and mass of the proposed new building and its impact on Elephant Park residents. There has been a lack of consultation over the new proposed health hub. Objections in terms of the OPP:

- Housing – Lendlease asserts that it has delivered the required amount of housing including affordable housing. Contrary to the local plan requirement in 2012 when permission was granted and policy now in the SSWark Plan 2022, only 25% affordable housing has been built. This is 10% less overall than the local plan required then and requires now. All the social rented housing in Elephant Park is 3 bed properties. SLC has been informed of the rents for 64 properties via a FoI request and vary from the highest being £163.11/week. SLC has been advising a tenant in a social housing unit who is being charged £249.52/week for the flat, including service charges. SLC does not consider that Lendlease has

discharged the obligation to provide social housing given the rent discrepancy, and this is under enforcement investigation. There should be a wider formal audit of all of the social and affordable rent levels. SLC request the council to ask Lendlease and L&Q to provide a schedule of all social rented units, with the rents and service charges to establish if they are being properly let at social rents and the OPP s106 social rent terms. The same should be done for the affordable rented homes (market-related rent).

- Affordable retail – SLC does not believe the applicant has discharged its requirement to provide 10% affordable retail space. 902sqm of affordable retail space has been provided and the remaining 58sqm should be provided to comply with the policy requirement. SLC has been advising Pricebusters (a local business displaced from the shopping centre after 30 years of trading) who were offered an affordable retail unit in Elephant Park but were unable to accept the offer because of the high cost of the fit out. This is example of a business failing to secure an affordable retail unit in a development that is not meeting its requirement. The high fit out cost is a barrier to independent businesses accepting. The requirements for actual affordability have not been met.
- Community Space – The report for the 2012 OPP application stated there was at least 2,530sqm of community and cultural space in the Heygate estate. At least 1,000 sqm of community space has been lost due to the redevelopment. SLC does not believe the minimum requirements for community space (D1/D2 former use class) have been adequately met. The largest space, the children’s nursery is not a community space given its charges as a profit-making business. It is not available for “community or cultural purposes.” Question whether the library and heritage centre constitute community space. Projected expenditure was £6 million in the council’s 2018 budget. Not clear if this building is now leased or owned by the council, and how much Lendlease contributed to this community space. The pavilion does not provide affordable space for community groups. The charges are unaffordable. Part of the energy centre known as the Trunk purported for community use, is awaiting an application for change of use to D1 community space is waited. No details about the cost of this community space or its opening times are given to understand the viability of this community space.

491. Then for the current Plot H1 application itself, SLC raised the following summarised points in objection in its third letter:

- Housing – This application would result in a huge over-provision of business floorspace in Elephant Park as against the OPP, by proposing 56,849sqm compared with the OPP maximum of 5,000sqm. Plot H1 is a brownfield site, with an optimisation and presumption of housing development in London Plan policy H1, part B2. The need for affordable housing, particularly social rented housing, is even more acute than it was when the OPP was granted. 1,212 social homes were demolished on the Heygate Estate, and have been replaced by only 64 social rent homes, and the rent of these is queried. Plot H1 should be used to meet housing need. Lendlease should be required to use the plot to bring the whole development up to policy compliant levels of 35% affordable housing, half of which should be social rented.
- Health hub – New local health facilities are likely to be welcome in the

area however, SLC does not believe that they need to be supplied at the expense of housing. The OPP requires a health facility or financial contribution, and housing; both should be maintained and not be replaced by offices. While Lendlease may be allowed to pay a health contribution in the OPP s106 agreement SLC has no further details about the amount and spending of this health contribution in the area, and ask for these further detail be put out for consultation. There is insufficient information provided about the proposed health hub facility. The memorandum between Lendlease, the council and CCG provided more detail about the plans for the health hub which is likely to eventually replace Princess Street and Manor Place surgeries in Walworth - which was an option in previous documents, but now presented as a final proposal. This is a huge potential change and inadequate details have been given about how this is proposed to work and interact with the current local health provision. SLC is concerned about the knock-on impact on the provision of primary health care in Walworth and Elephant and Castle. Lendlease, the council and the local health trust already have well-advanced ideas of how this delivery can be reshaped, including the closure of the Princess St and Manor Place surgeries. The local community must be consulted before any decision about the planning application is made. SLC believes the proposal is so far-reaching that any meaningful consultation should be separate and in addition to the planning consultation.

- SLC objects to the hub being provided instead of affordable workspace as it will lose much needed employment opportunities. Policy P30 only allows this in exceptional circumstances. The developer has not discharged to obligation to provide 10% affordable retail space. A health hub was an extremely likely requirement of the development, with the 2012 report acknowledging a proportion of the D1 floorspace could be used for healthcare provision if there is an identified demand, with further consultation recommended to determine the future healthcare requirements. This facility should not be provided in lieu of affordable workspace and there should be a consultation to determine the requirements of future healthcare provision.
- Design, massing and impact on local residents – the proposal doubles the useable floor space from that consented. The significant change in massing will directly affect residents and users of the Walworth Road and of Elephant Park, and generated 471 objections. The OPP design of three low blocks and one 23-storey tower was drawn up after much consultation. The proposal is more than double the consented volume and fills the space for gardens and between buildings. It will have severe negative impacts on neighbouring buildings, particularly those directly opposite. The 3-4 storey premises on Walworth Road will face an 85 m high building. The proposed massing on the north side would have adverse light impacts on Mawes House and Tantallon House. The proximity to Hurlock Heights has impacts on all residents facing H1. For Strata Tower where most apartments face only one direction, there will be a substantial reduction in daylight and sunlight which will be absolute for residents with no other windows.

A number of masterplan guidelines were established with residents for designing the new north end of the Walworth Road. Careful design of the new high street buildings ensured they are set back behind trees, shop frontages and are kept to a single storey, integrating with the scale and

rhythm of Walworth Road as a high street. The currently proposed retail frontages are 10m high, ignore all the successful design attributes that have been integrated into the completed plots. The design approach for the street level ignores all previous lessons learnt.

The Design Review Panel's comments have not been addressed and the development has not been returned to the DRP for comment. SLC await this particularly in light of the more advanced discussions about the inclusion of a health hub in this building. Plot H1 will dominate views and reduce sunlight in Elephant Park and the pavilion, an important part of the overall development which is very well-used and cherished. The design will have a detrimental impact on the park's feeling of openness in the area and brightness overall.

The proposal fails to comply with policy P17 of the Southwark Plan by failing to make a positive contribution to the skyline and landscape, harming strategic and borough views, and not being of exemplary architecture. It will provide an overshadowing impact on the public realm, is overly bulky and does not have a good relationship with the public realm on north Walworth Road. The proposal fails to meet policy P56 of the Southwark Plan.

- Sustainability – Loss of the wildflower meadow as a vital area of biodiversity and green infrastructure. This green space is designated in the Southwark Plan policy map. The landscape architects who designed this meadow describe it as an important pedestrian link, a playful, meanwhile landscape providing a green oasis and shared sanctuary for people and pollinators by providing crucial habitat and foraging opportunities through ribbons of wildflower meadow, pollen-rich perennial planting and habitat stations. The proposal is contrary to Southwark Plan P58 by destroying Other Open Space and a significant biodiversity gain will be lost. The proposal does not comply with policy P70 as it does include PV panels, it has a high carbon factor from the District Heating Network at Elephant Park, does not maximise the opportunity and use of heat pumps and so the opportunities for carbon savings and on-site renewable energy maximisation are not met.
- Equality considerations – By departing from housing, and with no affordable workspace if a health hub is provided, a detailed Equalities Impact Assessment should be provided. SLC considers this could have significant negative impacts for those with the protected characteristic of race, age and disability, as well as those from lower-socio-economic groups who will lose out on potential affordable workspace and social housing, wheelchair and adapted housing if this plot were to have housing to a policy compliant level required by the Southwark Plan. It should also consider the impacts of a large non-residential building on the existing and prospective residential and business habitants of Elephant Park.

Officer response to the SLC objections: The assessment section of the report considers the uses proposed, relationship with the OPP, health hub in lieu of affordable workspace, design, sustainability and neighbour amenity impacts but to respond to some of the points raised by the SLC. The inclusion of 60,000sqm of employment floorspace from Elephant Park within the Southwark Plan's Table A of "Delivery in Vision Areas" and the strategic targets was considered during the examination of the Southwark Plan, and found to be sound. The affordable housing, affordable retail and community space obligations of the OPP continue

to apply to the masterplan as the final plots are constructed, irrespective of the outcome of the current application and are not impacted by the proposal. The OPP obligation allowed for either financial payments to be made or a health facility of up to 500sqm to be provided within the masterplan. Financial contributions totalling £1.1m have been collected from the OPP masterplan so far, a payment of a further £342k is due in the coming weeks and with more due on completion of the remaining plots, none of which has been spent yet. The proposed health hub is much larger than the OPP envisaged for an on-site facility. This planning application does not remove any requirement on the CCG to carry out its own consultation on health services, nor does it restrict the operation of local GP surgeries. Part of the plot is shown on the Ordnance Survey map as greenspace, but is not formally designated open space in the Southwark Plan, and as temporary landscaping would not be considered as other open space in policy P57 terms. Lendlease is likely to reuse the wicker sculptures in the park and some of the planting and wildflower turf, and is in dialogue with local groups about relocating the remainder to local parks. A statement of equality impacts has been provided recently by the applicant.

492. **35% Campaign** – wishes to make the following further objection. The number of homes in Elephant Park stated in the Reconciliation and Comparison Statement is inconsistent with the information being supplied to the Australian Securities Exchange, which had 284 more homes on Elephant Park and Lendlease's neighbouring Trafalgar Place development. The Reconciliation statement's purpose is to show that the applicant has met the requirements of the OPP and thus enable approval of the applicant's new standalone application. The number of homes delivered under the OPP must therefore be a material consideration for this application. Amongst other things the number of homes affects density and various s106 requirements. The number of homes must be definitely established before the application can be considered and any difference in the number from the Reconciliation statement explained.
493. The 35% Campaign also raised a potential enforcement issue with the amount of rent and service charge being charged by L&Q for social rent flats, suggesting it is higher than social rents and the average rents by housing associations published by the council. That if this is the case, then the applicant, Lendlease, has not met the s106 obligation of the OPP to deliver the 3-bed rented affordable housing on Elephant Park as social rent. The Campaign asks that the Plot H1 planning application not be determined until information is provided for the rent and service charges for all social rent units in Elephant Park to establish that they are being properly let in accordance with the OPP s106 terms.

Officer response: The applicant has confirmed that the number of homes reported to the ASX is inclusive of One The Elephant (284 homes). The number of units within the masterplan is known by adding those approved in the RMAs. The social rent levels of units within the OPP are being investigated by the enforcement team and as part of the council's affordable housing monitoring. This is not a reason to delay deciding this application nor to refuse it.

494. **Public comments in objection** – 36 further comments in objection, summarised below into topics.

495. Insufficient amendments

- None of the objections have been addressed. The revisions to the original application aren't substantially different, fails to address the points in the hundreds of objections with no meaningful modifications. The reduction in floorspace is miniscule. Therefore the previous reasons in the objections are still relevant.

496. Departure from the masterplan

- Over development of the site and the area which has already many high rise buildings.
- This application represents a change to the consented masterplan and significantly undermines it.
- The loss of housing needs to be considered. The London Plan policies require housing delivery to be optimised, including public sector owned sites (with 50% affordable housing).
- This proposal is ten times the maximum office floorspace of the OPP, and is double the office area for the whole of the E&C area in the Core Strategy and SPD. Three times the size of the approved floorspace for this plot.
- The proposed design is taller, wider, has significantly larger mass at higher elevations than originally proposed and approved in the masterplan, and almost double the size/floor area of the maximum parameters. It combines what is meant to be three buildings into one.
- It should not be taller than the approved parameters, the applicant should be required to fit within them.
- Lendlease would not have received permission in 2013 if the masterplan had included this proposal. What should be one of the smallest plots is now proposed to be one of the largest.
- Lendlease has not fulfilled its affordable housing, retail and community space obligations. This plot should be used to meet housing need, to provide genuinely low cost space to relocate traders who have lost affordable retail space, and to provide more space in Elephant Park that is free or relatively cheap to hire.
- The public consultation and community engagement undertaken for the masterplan is relevant to this application.

497. Office use

- The case for office space is not proven.
- This proposal is out of touch with what is needed by the local community.
- Another commercial development so close to the new E&C centre is not needed and is inappropriate.
- Office use doesn't add to the community. It will be empty in the evenings and weekends.
- Instead of building a cohesive and inviting residential community, the applicant has chosen to commercialise for profit and disregarding the impact on their own residential neighbourhood.
- It will become another empty new build.
- The negative impacts of such a large building are not balanced by the benefits of more office space.
- A couple of objections were supportive of office use in principle, but only for a much smaller building.

498. Housing

- The plot should be used to provide more homes instead.
- The area is meant to be residential. The proposal undermines the character of the area as being a residential neighbourhood.
- The housing estate that was demolished should be replaced with new residential, and at a moderate/earnest height.
- Affordable homes are in desperate need, not this huge office block.

499. Design

- Out of keeping with character of area. The proposed scale/massing of the design is out of keeping with the immediate surrounding area, particularly the Victoria terracing immediately opposite and will impinge on the skyline further afield.
- Development too high.
- Taller and significantly larger than the approved building.
- Such a large building does not belong in a residential area.
- Totally out of keeping with anything already built or being built. It is too large, overbearing and will not fit in with the overall design of the new Elephant Park area. A monstrous building that will harm the openness of the area.
- The design is over-bearing, of poor quality, ugly and unsuited to this key location at the north end of the Walworth Road. It detracts from the Walworth Road and the new links between the E&C and Walworth. Fails to create a safe environment for people in West Walworth to cross to Elephant Park.
- No study has been undertaken from within the Newington Estate/Hampton Street or from the South West (in the direction of Kennington Park Road)
- The exterior red cladding looks like a rusting hulk; a better finish is needed. Out of character with brick buildings surrounding the park.
- This behemoth would further darken the area. Hurlock Heights and Strata in the vicinity block a lot of the sunlight to the park and surrounding buildings.
- The building should be halved in size to address the objections.

500. Park and ecology

- The new park would be swamped on all sides and not pleasant. The park is already too small for the amount of people living here. An extra 4,000 office workers will destroy the park with footfall and noise pollution in no time.
- More open space is needed, instead of an office.
- The endless construction produces even more densely packed spaces, more pollution, and negatively impacts physical and mental health of residents. More open/green space and general space to breathe are needed.
- It will overshadow the park, significantly negatively impact the public space in Elephant Park. Block sunrises.
- It will reduce the area of the park. The site should be used to extend the park instead.
- Affect local ecology. The removal of the wildflower meadow will also significantly harm the biodiversity of the area.

- More open space and amenities are needed for local residents.
- Children's play space will be overlooked by the offices.
- Lendlease suggests the new development would overshadow the park less than the original proposal. Whilst this might be the case with the chosen metric, a larger building with significantly increased massing will be more detrimental to the park in terms of views, feeling of openness in the area and brightness.

501. Transport

- Increase in traffic.
- Increase in pedestrians in the area cannot be supported.
- Inadequate public transport.
- Not enough transport in the area to support a large office.

502. Neighbour amenity impacts

- Loss of light, much greater than the original masterplan's impacts. The increased massing is much closer to Plot H2 and Strata.
- Loss of privacy.
- Reduced daylight and privacy for properties both immediately adjacent and also for those on the other side of the Walworth Road and railway line.
- Too close to neighbouring properties.
- Noise nuisance.

503. Other objection topics

- A health hub does not justify the size and disproportionate nature of the proposal.
- Environmental pollution, air pollution and noise.
- Flooding risk.
- Strain on existing community facilities. Harm to nearby facilities and services from the additional people.
- Conflict with local plan.
- General dislike of proposal. An undesirable proposal.
- The applicant and council are not doing good for the area.

504. **Public comments in support** – two further comments in support were received summarised as:

- A modern office building will bring jobs to the area. The pandemic-related work from home objections are unconvincing; this building will stand long after the pandemic is a distant memory. Even if a portion of workers continue working from home the economy will continue growing and need a supply of office space.
- Well thought through.
- Health facility is welcome.
- It fits in with the emerging cluster of tall buildings nearby.

505. **Guy's and St Thomas' NHS Foundation Trust** - reiterates the Trust's support in principle and requests that obligations to secure the health hub are included in any future grant of planning permission. E&C is a proven required location for further healthcare floorspace, in the form of a health hub. The proposed development and the wider Elephant Park, significantly increase the number of

visitors, workers and residents to the area which has an inherent impact on healthcare services in this location and the wider borough. The provision of floorspace in this development is an important step in ensuring the future of healthcare service delivery in the area.

506. The Trust continues to have strong interest in occupying the proposed Health Hub. As discussed with both Lendlease and the council, the need for and delivery of a Health Hub is absolute and this is supported by the CCG. The exact scope and delivery of services continues to be developed and discussions will continue as the scheme progresses. It is important that the status of the health hub is secured and the Trust requests that a section 106 obligation is attached to the permission to reasonably and properly safeguard the health hub floorspace for the use of a healthcare provider, in consultation with the Trust and CCG. It should be offered to the Trust, or another appropriate NHS provider, in the first instance. The Trust has no comments to make at present on the layout or additions to the submitted health hub summary. A priority for the health hub is ensuring appropriate access and signage, and so request that any landscaping condition attached to the permission includes the location of appropriate signage.

Consultation responses from external and statutory consultees

507. **Arqiva** – has considered whether this development is likely to have an adverse effect on its TV and radio operations and have concluded that it has no objections to this development.
508. **Environment Agency** – request conditions regarding contamination risk, verification of remediation works, unexpected contamination, surface water drainage and no piling without consent.
509. **GLA** – provided the Stage 1 report. The Deputy Mayor considers that the application does not yet comply with the London Plan but that the possible remedies could address these deficiencies. The topics of the GLA response are summarised as follows.
- 1) Principle of estate regeneration: While the scheme does not result in the demolition of any existing housing, the proposed development will have a direct and permanent impact on residents living within the redeveloped estate, with a significant quantum of office floorspace, changes to public realm, access, amenity, privacy, amenity, and non-residential facilities. Full and transparent consultation has occurred with identified direct engagement and consultation events. The redevelopment would provide jobs, services and facilities in a highly accessible location and provision of public realm, would comply in principle with objective GG5 of the London Plan.
 - 2) Land use: Noting that the housing and affordable housing obligations of the Heygate Estate regeneration masterplan have been achieved, the principle of optimising this site within the Opportunity Area and CAZ to deliver a significant amount of office floorspace, active uses and public realm is accepted in strategic planning terms. An equalities statement should be provided to assess the impact of the development on persons who share a relevant protected characteristic.
 - 3) Urban design and heritage: The site is within an area that is identified as

broadly suitable for tall buildings in the local and emerging local plan. Further information requested of the cumulative impact on the setting on the Westminster World Heritage Site before this may be weighed against public benefits. Further options should be explored to reduce the inactive frontage along Deacon Street in this town centre and CAZ locality. Management of the public realm, lighting and safety measures, provision of free drinking water, and freely accessible public toilets should be secured.

- 4) Fire safety: Compliance with policy D12 of the London Plan should be secured by condition.
- 5) Energy: Further information is required in relation to a number of elements of the proposed energy strategy.
- 6) Air quality: Construction phase conditions should be imposed.
- 7) Flood risk: A flood warning and evacuation plan should be secured by condition.
- 8) Sustainable drainage: The surface water drainage strategy does not give appropriate regard to the greenfield runoff rate and SuDS. The drainage strategy should be revised.
- 9) Water efficiency: Rainwater harvesting and reuse should be considered to reduce consumption of water, which can be integrated with the surface water drainage system to provide a dual benefit.
- 10) Biodiversity: Evidence should be provided to demonstrate that the proposed development secures a net biodiversity gain.
- 11) Circular economy: Detailed technical comments in respect of the circulated economy were provided.
- 12) Transport: A financial contribution of £2 million should be secured to mitigate impacts on the Elephant and Castle Underground Station caused by the number of trips generated by the scheme. As the site lies close to London Underground tunnels, a condition should secure the submission of excavation, piling and construction method statements, with an asset protection agreement if appropriate. A delivery and service plan, construction logistics plan and travel plan should be secured.

510. **Historic England** – has no comment.
511. **Lambeth Council** – raises no objection.
512. **London Fire Brigade** – has reviewed the Design and Access Statement and has no observations to make.
513. **London Underground Limited** – has no objection in principle although there are a number of potential constraints on the redevelopment of a site situated close to underground tunnels and infrastructure. It will need to be demonstrated to the satisfaction of LUL engineers that: the development will not have any detrimental effect on its tunnels and structures either in the short or long term; the design must be such that the loading imposed on its tunnels or structures is not increased or removed; and it offers no right of support to the development or land. LUL requests a condition be included, and a suggested informative.
514. **Met Police** – consider the proposal suitable to achieve Secured by Design accreditation and ask for a two-part condition to be included on any permission.

515. **Natural England** – has no objection.
516. **Network Rail** – asks that the applicant engages with the assets protection team prior to works commencing to ensure the works can be completed without any risk to the operational railway. Recommends informatives for any permission. Network Rail is currently working with the council on funding a pre GRIP (Governance for Railway Investment Projects) \ PACE (Project Acceleration in a Controlled Environment) report on Access for All and station decongestion at Elephant & Castle. Beyond this report, Network Rail will require third party contributions to fund the project through the process and ultimately construction in order to secure funding from the DfT. Network Rail will continue to work with the council on this project.
517. **Thames Water** – has identified there is insufficient infrastructure capacity for foul water, surface water drainage and water network needs of the proposal. Request three conditions be included on any permission, and further comments (about groundwater discharge, trade effluent, petrol and grease separators, proximity to infrastructure, sewer connection and surface water drainage) can be included as informatives.
518. **Westminster City Council** – does not wish to comment.

Re-consultation responses from external and statutory consultees

519. **Environment Agency** – the comments made in response to the first consultation still apply.
520. **GLA** – made further comments and queries on: energy (requesting further information on the connection to the heat network, decarbonisation plans, and potential for PV); whole life carbon; and drainage that the reduction to the discharge rate is supported, disappointing that rain water harvesting has been discounted, and that the proposed strategy needs to be workable and carried through to the detailed design stage. In response the applicant provided further information to address the GLA queries on energy and the district heating network so that these have been resolved to the GLA's satisfaction until the Stage 2 process.
521. **London Fire Brigade** – has no further observations to make. Its comments on any deviations from its guidance can be used as informatives.
522. **London Underground Limited** – repeats its earlier comment that it has no objection in principle but asks for a condition and informatives been included on any permission.
523. **Met Police** – previous comment is still valid, and ask that a Secured by Design condition is included on any permission.
524. **Network Rail** – provided an update on the work currently being undertaken with the council and request a contribution to provide lifts at Elephant and Castle train station. Network Rail and Govia Thameslink Railway are currently working with the council on delivering a pre-GRIP/PACE feasibility study on Step-Free access

(Access for All) at the train station. The Access for All program aims to address issues faced by disabled passengers and passengers facing mobility restraints (such as heavy luggage or pushchairs) when using railway stations by creating an obstacle free, accessible route from the station entrance to the platform. This generally includes providing lifts or ramps, as well as associated works and refurbishment along the route. This feasibility study was funded by the council, Lendlease and Delancey. Beyond this study, third party contributions to bid for funding from the Department for Transport are required. This will essentially fund the project through NR's GRIP/PACE processes and ultimately construction of the lifts.

525. The current development around Elephant and Castle Station provides a 'once in a lifetime' opportunity to provide step-free access at the station. Network Rail request the £2m contribution (later revised to £1.72m) towards transport benefits fund the construction of lifts, creating an obstacle free, accessible route from the station entrance to the platform. The benefit of having accessible stations are far reaching, making it easier for both future residents and the existing community to visit friends, get to the shops or to work. Accessibility benefits everyone – people with health conditions or impairments, people with children, heavy luggage or shopping and some older people. It is also good for the economy and means fewer car journeys, less congestion and carbon emissions.
526. Without this contribution, it is highly likely that the station will continue to not be fully accessible compared with the rest of the new step-free town centre and underground interchange services. This would have an adverse impact on the local community and could also cause negative publicity for all parties involved. Whilst NR appreciates this may take funding away from the TfL and the Bakerloo Line Extension, TfL will have more opportunities to receive funding from developments in London, unlike Elephant and Castle station. Network Rail consider the £1.7m contribution required by TfL should instead be used to priority step free access to the overground station.
527. **TfL** – the proposed are unlikely to result in any additional strategic transport concerns over those raised in the GLA Stage 1 report. Since the stage 1 report, TfL agreed with the applicant a slightly lower level of contribution towards the Northern line ticket hall project of £1,721,384. The contribution amounts requested for cycle hire expansion and Legible London remain the same.

Consultation responses from internal consultees

528. **Ecology officer** – the ecological survey and bat survey are fine and no further surveys are required. The proposed green roof and planting is good. Recommend conditions for an ecological management plan, biodiverse roof planting and swift nesting features.
529. **Environmental protection team** – considers the submitted acoustic report to be acceptable to set the specification needed for the façades to address the noise levels of this site. Recommends a series of conditions relating to plant noise; odour from kitchens; construction management; and land contamination. These have been included in the recommendation.
530. **Flooding and drainage team** – raised objections with more information needed

on the drainage hierarchy and the calculations for the runoff rates in the drainage strategy and basement impact assessment.

531. **Highways** – raised four areas that need to be resolved prior to a decision (regarding the height of the planted areas and visibility splays for the servicing yard, measures for cyclists on Deacon Street, the location of the cycle parking on Deacon Street, and having no outward opening doors onto the footway). Any permission would be subject to highway works and a construction management plan being secured in a planning obligation. Other comments regarding building overhangs, drainage onto the highway, foundation and basement details due to the proximity to the highway, pre-construction surveys, and the SSDM can be used as informatives on any permission.
532. **Local economy team** – support the proposal. The H1 Development proposes to provide 10% of the proposed office floorspace as affordable workspace in line with policy, though they wish to explore the alternative use of a medical hub alongside office use. LET is happy to explore this with planners and the developer. The bespoke method for calculating construction phase jobs, skills and employment requirements on Elephant Park (as used in the 2013 OPP section 106 agreement) would continue to be used for this plot. LET is content with this methodology and request an employment and training scheme as per previous reserved matters applications, to reflect the mirroring of those applications for employment and training.

Re-consultation responses from internal consultees

533. **Ecology officer** – the updated urban greening factor is an improvement with a score of 0.35.
534. **Flooding and drainage team** – The applicant has provided additional information, an updated drainage hierarchy and updated the runoff rates for the site. Queries were raised in response regarding the discharge point connection, the calculations to support the runoff rate and clarification of the catchment being urbanised or greenfield, that the attenuation volume proposed is not equal to or greater than the volume required and querying how exceedance events would be managed, and needing further information on maintenance. These have been addressed recently through further information so that the drainage scheme is acceptable.
535. **Highways** – question the convenience of the blue badge car parking spaces indicated in Plot H2's basement for the proposed health hub to use as these are far more than the 50m distance suggested in national guidance. Comments incorporated in the transport and highways section above.
536. **Local economy team** – content with the small reduction in affordable workspace commensurate with the reduction in overall floor area, and with the make-up of the space.
537. **Urban forester** – welcomes the improvement to the urban greening factor.

Community impact and equalities assessment

538. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights
539. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
540. 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.
541. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.
542. The application site is a partly vacant brownfield site that forms part of the Elephant Park masterplan redevelopment which demolished the Heygate Estate. The existing "urban farm" business on part the site was permitted as a temporary use, with a time-limited permission until 31 March 2023. Temporary landscaping including play features were provided by the applicant as an interim use of part of the plot (until its long-term redevelopment is constructed). Their permanent provision on this plot is not needed to meet the planning obligations of the OPP and the adjoining central public park provides formal play areas and further open space for the community's use.
543. The 2013 OPP to redevelop the Heygate Estate has been implemented, three phases of the redevelopment are now complete and construction work has commenced on the remaining plots. Residents of the former Heygate Estate were moved from the site several years ago. The current Elephant Park residents have moved into new buildings within the masterplan, and the impacts upon their

residential amenity, as well as other surrounding residential properties and the public park have been considered in the assessment above. As part of the OPP masterplan, the plot was approved for a residential-led building which would not proceed if the current application is approved and constructed. However, there would be no loss of approved affordable housing from the masterplan as the rest of the Elephant Park masterplan will build more than the minimum residential floorspace required by the OPP. The masterplan will provide 25% affordable housing and 10% wheelchair housing as approved by reserved matters applications for the other plots in the OPP.

544. Data from 2019 shows a larger proportion of Southwark residents are from black, Asian and mixed ethnic backgrounds when compared to England, and with a greater proportion of black and Asian minority groups in Elephant and Castle. In 2019, the Elephant and Castle area (including the site) ranked within 20% most deprived in England by the national overview indices of deprivation, including for health deprivation and disability, for crime, and living environment. It had a high rate of child poverty and child obesity.
545. The applicant provided a statement of equality impacts which considers the potential equality effects of the proposal as 1) the impact on access to healthcare facilities at operation of the proposal, 2) impact on accessibility, inclusivity and active travel during construction and operation, 3) the impact on the neighbourhood amenity in construction and operation, and 4) the impact on employment and skills in construction and operation. It considers the prevalence of protected groups in the area at the local area of 7 Census wards, the borough, London and England. It considers whether the impacts may be disproportionate, on a community containing a disproportionate number of individuals with a protected characteristic or the way an asset is used disproportionately by an equalities group. To give some examples, the local area has a higher proportion of children and young people (32%), and of working age people (76%) than the London proportions (31% and 67%) and England proportions (30% and 62%), and has a higher prevalence of ethnic minorities (48%) than the proportions in London (40%) and England (15%). Differential effects are also considered; those with protected characteristics may experience differential effects by being affected in different ways to those without protected characteristics, even if the number of those people is small. One example of how groups are at risk of experiencing differential equality impacts from the proposal, are groups who typically experience discrimination in accessing the labour market (young people, older people, disabled people, gender reassignment and transgender people, sexual orientation (non-heterosexual), ethnic minorities and females), who may experience differential positive impacts on accessing the labour market from the proposal's employment and skills initiatives.
546. The submitted statement of equality impacts considers the following likely equality effects of the proposal.
1. Access to healthcare facilities – the site is in an area with high ratios of patients to GPs, high need for pharmacies, and growing outpatient attendances. The proposed health hub would have a positive disproportionate equality effect on those with protected characteristics of age, race, and religion or belief, and a positive differential impact on age (older people), disability, and pregnancy and maternity. It would assist in eliminating discrimination by providing an inclusive health hub

for the community, and promote equality of opportunity by improving access of all groups to healthcare services.

2. Accessibility, inclusivity and active travel – there would need to be temporary and partial closures of routes next to the site for construction access, which would result in a neutral effect. At completion, the development would provide inclusive access for all community members, as well as seating, passive surveillance, improvements to pedestrian and cycle facilities such as a new crossing, and blue badge parking spaces. In the operational phase the proposal is expected to have a positive disproportionate effect on those with the protected characteristics of age, race, religion or belief, and have a positive differential equality effect on those with disabilities, pregnancy and maternity.
3. Impacts on neighbourhood amenity – air quality, noise and vibration controls and conditions for the construction and operational phases would limit the proposal's impacts to have neutral effects overall. For the daylight and sunlight impacts, the characteristics of those living in the affected neighbouring properties are not known, and the effects may be differential, for example children or older residents who tend to spend more time at home. The quantum of affected residential buildings (and the number of rooms and units affected) when considered in the context of the local area, it is likely that the equality impacts would not be considered to be large. The proposed landscaped public realm would provide a legible and safe environment, with rest points and inclusive furniture that is publicly accessible at all times. In the operational phase, the proposal is expected to have positive disproportionate effects on age, race, religion or belief and a positive differential equality impact on age and disability from its public realm benefits.
4. Employment and skills – the construction phase would provide training and employment opportunities, including for borough residents. The completed development would also provide employment opportunities for borough residents, including those from protected groups. At the borough level, the proposal is expected to have a positive disproportionate effect on age, race, religion or belief and a positive differential impact on age (young and older), disability, gender reassignment, race, and sex (females) from the improvement in access to employment and training.

547. No equality effects for marriage and civil partnership, nor for those with Christian or no religion characteristics were found in the statement of equality impacts. Its summary finds the proposal would have positive and neutral effects on groups with other protected characteristics for the four topics considered.

548. The scheme has incorporated inclusive design features for the future staff and visitors to the building. It is located in a town centre location close to residents and with ready connections for walking, cycling and public transport. The jobs and training would improve opportunities for people with protected characteristics (such as those of different ages, disabilities, genders, sexual orientation and races) to be equipped with the skills and knowledge to access the employment opportunities, to return to work, to be and stay financially independent, and to start or grow a business. The proposal would provide accessible public realm and facilities open to the public in the accessible active

lobby. A health hub may be provided within the proposal which would assist in improving health services in the area, including for those with protected characteristics of age, disability, race, gender and gender reassignment, pregnancy and maternity, and would help to address health inequalities by improving access to health services for the community. If a health hub is not provided, affordable workspace would be provided which would provide employment opportunities, including for those with protected characteristics such as age, race, disability, gender and sex.

Human rights implications

549. 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.
550. This application has the legitimate aim of redeveloping a brownfield site for a mixed use scheme. 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

551. The council has published its development plan 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.
552. 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?	Mostly, further amendments were needed
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, amendments provided in December 2021
To help secure a timely decision, did the case officer submit their recommendation in advance of the agreed Planning Performance Agreement date?	No

CONCLUSION

553. The submitted standalone planning application for Plot H1 departs from the approved OPP for Elephant Park, by proposing a scale of development and with uses that do not fit within the approved parameters of the 2013 outline planning permission. This full planning application is to be determined in accordance with the development plan unless material considerations indicate otherwise.
554. There is policy support for office development within the CAZ, Opportunity Area and town centre and a policy requirement to provide affordable workspace. There is policy support for health facilities and retail. While there are policies in the development plan that support the provision of housing on sites such as this, it is not a reason to refuse a scheme which proposes other uses that have equal policy support. The other plots within the masterplan are providing the approved residential floorspace of the OPP, almost to the very maximum area, and its proportion of affordable housing.
555. The proximity to the various public transport modes and the site being at a point of landmark significance near to existing and consented tall buildings are considered to allow the scale of the proposed development which, while of greater width than the approved OPP parameters is of similar maximum height. The proposal would add a distinctive building to contribute positively to the townscape of the masterplan and wider Elephant and Castle area, and provide high quality public realm and a publicly accessible lobby.
556. The proposal would achieve an “outstanding” BREEAM rating, has complied with the whole life carbon and circular economy policy requirements and incorporates cross-laminated timber to reduce the amount of embodied carbon. It would connect to the Elephant Park heating network. The flooding risk has been suitably addressed. Staff and visitor cycle parking is proposed, and highway works, servicing management, and financial contributions would be secured to mitigate the transport and highway impacts. The proposed planting around the base of the building and on its terraces and roof would comply with urban greening policies.
557. Due to the size of the proposed building, it would cause harm to the amenity of some neighbouring properties through loss of daylight, sunlight and overshadowing. It would not cause a significant loss of privacy nor raise noise issues subject to recommended conditions. The harm to neighbour amenity must be considered in the wider planning balance, and officers are of the view that the public benefits of the scheme outweigh the incidences of harm. The proposal would not cause significant overshadowing of the new park at the centre of Elephant Park.
558. The environmental information submitted with the application has been considered in the assessment of its expected impacts, and has informed proposed conditions and planning obligations to secure necessary mitigation.
559. It is recommended that planning permission be granted, subject to conditions set out in the recommendation, the timely completion of a section 106 legal agreement to secure the heads of terms detailed above, and referral to the Mayor of London; and

560. 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
561. That the planning committee in making their decision has due regard to the potential equalities impacts that are outline in this report; and
562. 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
563. That following issue of the decision, the director of planning and growth shall place a statement on the statutory register pursuant to regulation 28 of the Town and Country Planning (Environmental Impact Assessments) Regulations and for the purposes of regulation 28(1)(h) the main reasons and considerations on which the local planning authority's decision is based shall be set out as in this report; and
564. In the event that the requirements of paragraphs 1 and 559 above are not met by 4 April 2023 the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 429.

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 1214 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Recommendation (draft decision notice)
Appendix 2	Planning policies and material considerations
Appendix 3	Relevant planning history of the site and nearby sites
Appendix 4	Consultation undertaken
Appendix 5	Consultation responses received

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth	
Report Author	Victoria Crosby, Team Leader	
Version	Final	
Dated	20 September 2022	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
Date final report sent to Constitutional Team		21 September 2022

SOUTHWARK COUNCIL

Town and Country Planning Act 1990 (as amended)

Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended)



www.southwark.gov.uk

RECOMMENDATION

LBS ref: 21/AP/1819

Date of Recommendation:

Applicant C/o Agent
 Lendlease (Elephant & Castle) Limited

Planning permission be granted subject to a legal agreement and referral to the GLA for the following development:

Redevelopment of the site to provide an 18-storey building (including a mezzanine floor) plus basement and rooftop plant providing office floorspace (Class E(g)(i)) and areas of floorspace for the following flexible uses: office/retail/services/food and drink/medical or health floorspace (Class E(g)(i), E(a), E(c), E(b) or E(e)), including ancillary cycle parking, accessible car parking, servicing, plant, roof terraces, landscaping, public realm improvements and other associated works incidental to the development. The application is accompanied by an Environmental Statement submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

At

Plot H1 Elephant Park Land Bounded By Walworth Road, Elephant Road, Deacon Street And Sayer Street North Elephant And Castle London

In accordance with the valid application received on 4 June 2021 and supporting documents submitted which can be viewed on our Planning Register.

For the reasons outlined in the case officer's report, which is also available on the Planning Register.

The Planning Register can be viewed at: <https://planning.southwark.gov.uk/online-applications/>

Conditions

Permission is subject to the following Approved Plans Condition:

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

Reference no./Plan or document name/Rev.

Received on:

259639-A100-H01-01-PL-ZZ-0202 P102 Location Site Plan:
Proposed

259639-A100-H01-01-PL-ZZ-0207 P102 Proposed Site Plan

259639-A100-H01-01-PL-ZZ-0209 P102 Proposed Roof Plan

259639-A100-H01-01-PL-ZZ-0211 P102 Proposed Site Plan GF

259639-A100-H01-20-PL-B1-1002 P102 Floor Plan-Basement
Level 1

259639-A100-H01-20-PL-BM-1003 P102 Floor Plan-Basement
Mezzanine

259639-A100-H01-20-PL-00-1004 P104 Floor Plan-Level 00

259639-A100-H01-20-PL-MZ-1006 P102 Floor Plan-Level
Mezzanine

259639-A100-H01-20-PL-01-1007 P102 Floor Plan-Level 01

259639-A100-H01-20-PL-02-1008 P102 Floor Plan-Level 02

259639-A100-H01-20-PL-03-1009 P102 Floor Plan-Level 03

259639-A100-H01-20-PL-04-1010 P102 Floor Plan-Level 04

259639-A100-H01-20-PL-05-1011 P102 Floor Plan-Level 05

259639-A100-H01-20-PL-06-1012 P102 Floor Plan-Level 06

259639-A100-H01-20-PL-07-1013 P102 Floor Plan-Level 07

259639-A100-H01-20-PL-08-1014 P102 Floor Plan-Level 08

259639-A100-H01-20-PL-09-1015 P102 Floor Plan-Level 09

259639-A100-H01-20-PL-10-1016 P102 Floor Plan-Level 10

259639-A100-H01-20-PL-11-1017 P102 Floor Plan-Level 11

259639-A100-H01-20-PL-12-1018 P102 Floor Plan-Level 12

259639-A100-H01-20-PL-13-1019 P102 Floor Plan-Level 13

259639-A100-H01-20-PL-14-1020 P102 Floor Plan-Level 14

259639-A100-H01-20-PL-15-1021 P102 Floor Plan-Level 15

259639-A100-H01-20-PL-16-1022 P102 Floor Plan-Level 16

259639-A100-H01-20-PL-17-1023 P102 Floor Plan-Level Roof

259639-A100-H01-20-PL-18-1024 P102 Floor Plan-Level Plant
2

259639-A100-H01-20-EL-ZZ-1200 P102 North Elevation

259639-A100-H01-20-EL-ZZ-1201 P102 East Elevation

259639-A100-H01-20-EL-ZZ-1202 P102 West Elevation

259639-A100-H01-20-EL-ZZ-1203 P102 South Elevation

259639-A100-H01-20-EL-ZZ-1204 P102 North East Elevation

259639-A100-H01-20-EL-ZZ-1205 P100 South East Elevation

259639-A100-H01-20-EL-ZZ-1206 P102 South West Elevation

259639-A100-H01-20-SX-ZZ-1100 P102 Section-AA

259639-A100-H01-20-SX-ZZ-1101 P102 Section-BB

259639-A100-H01-20-SX-ZZ-1102 P102 Section-CC

259639-A100-H01-20-SX-ZZ-1103 P100 Section-DD

259639-A100-H01-25-EL-ZZ-2900 P102 Ground Floor Facade
Elevations - Sheet 1

259639-A100-H01-25-EL-ZZ-2901 P102 Ground Floor Facade
Elevations - Sheet 2

259639-A100-H01-25-EL-ZZ-2902 P102 Ground Floor Facade

Elevations - Sheet 3
 259639-A100-H01-25-EL-ZZ-2903 P100 Ground Floor Facade
 Elevations - Sheet 4
 259639-A100-H01-25-EL-ZZ-2904 P100 Ground Floor Facade
 Elevations - Sheet 5
 259639-A100-H01-25-EL-ZZ-2905 P100 Ground Floor Facade
 Elevations - Sheet 6
 259639-A100-H01-25-EL-ZZ-2906 P100 Ground Floor Facade
 Elevations - Sheet 7
 259639-A100-H01-25-EL-ZZ-2907 P100 Ground Floor Facade
 Elevations - Sheet 8
 259639-A100-H01-25-DT-ZZ-2910 P102 Typical Facade Bays -
 Office Floors - Sheet 1
 259639-A100-H01-25-DT-ZZ-2911 P102 Typical Facade Bays -
 Office Floors - Sheet 2
 259639-A100-H01-25-DT-ZZ-2912 P102 Typical Facade Bays -
 Office Floors - Sheet 3
 259639-A100-H01-25-DT-ZZ-2913 P100 Typical Facade Bays -
 Office Floors - Sheet 4
 259639-A100-H01-25-DT-ZZ-2914 P100 Typical Facade Bays -
 Office Floors - Sheet 5
 259639-A100-H01-25-DT-ZZ-2915 P100 Typical Facade Bays -
 Office Floors - Sheet 6
 259639-A100-H01-25-DT-ZZ-2920 P100 Typical Facade Bays -
 Terrace Facade
 251797-LA01-REH1-90-PL-00-100 06 H1 Public Realm General
 Arrangement Plan

Reason:

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

Permission is subject to the following Time Limit:

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

Reason:

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

3. APPROVED DEVELOPMENT

The development hereby permitted is limited to a maximum height of 78.13m (AOD) to the roof level parapet, 83.58m (AOD) to the level plant 2 screen and 85.730m (AOD) to the top of the plant screen.

Uses within the development hereby permitted are limited to the following maximum floor areas and at the identified floor levels:

Offices - Class E(g)(i) - levels 2 to 16 - 48,750 GIA sqm, 48,960 GEA sqm.
 Offices or health - Class E(g)(i) or E(e) - mezzanine and first floors levels -

6,729 GIA sqm, and 6,759 GEA sqm.

Offices, retail, professional services, health - Classes E(g)(i), E(a), E(c), E(e) - ground level - 264 GIA sqm and 277 GEA sqm.

Offices, retail, professional services, cafe and restaurant - Classes E(g)(i), E(a), E(c), E(b) - ground level - 1,664 GIA sqm and 1,704 GEA sqm.

Ancillary areas including the servicing yard, cycle storage and plant - basement, ground, mezzanine and roof levels - 5,566 GIA sqm and 6,258 GEA sqm.

Reason:

This is in accordance with the application details, the approved plans and the Environmental Statement.

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

4. LONDON UNDERGROUND ASSET PROTECTION

Prior to the commencement of development, detailed design and method statements shall be submitted to and approved in writing by the Local Planning Authority (in consultation with London Underground) which:

- provide demolition and construction details on all structures, including all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent) for each stage of the development
- accommodate the location of the existing and future London Underground structures and tunnels
- accommodate ground movement arising from the construction thereof
- and mitigate the effects of noise and vibration arising from the adjoining operations within the structures and tunnels.

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted, which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition, shall be completed, in their entirety, before any part of the building hereby permitted is occupied.

Reason:

To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with policy T3 of the London Plan (2021) and 'Land for Industry and Transport' Supplementary Planning Guidance (2012).

5. CONSTRUCTION WASTE MANAGEMENT PLAN

No works shall commence until a construction waste management plan has been submitted to and approved in writing by the Local Planning Authority.

The construction waste management plan shall include details of how waste will be reused, recycled and/or disposed of and managed during construction. The development shall be carried out in accordance with the approved construction waste management plan.

Reason:

In the interest of promoting waste reduction and protecting the amenity of the site in accordance with policies SI7 Reducing waste and supporting the circular economy of the London Plan (2022) and P62 Reducing waste of the Southwark Plan (2022), and to have regard to condition 19 of the outline planning permission.

6. DUST MONITORING

Prior to the commencement of development, a particulate monitoring survey shall be undertaken by the developer and shall be submitted to and approved in writing by the Local Planning Authority. The particulate monitoring survey shall include a background particulate survey covering a minimum of 3 months data for the perimeter for the application site, and shall be in accordance with the Institute of Air Quality Monitoring Guidance on Air Quality Monitoring in the Vicinity of Demolition and Construction Sites. Monitoring shall take place throughout the construction phase to ensure the approved monitoring targets are met.

The particulate monitoring survey details (monitoring locations, methodologies, frequency and method of results reporting) shall be submitted to and approved by the Local Planning Authority in writing prior to the submission of the particulate monitoring survey for approval. The survey shall be carried out in accordance with the approval given and the results of the survey shall be used to inform targets and monitoring requirements for the Construction Environmental Management Plan as required by the s106 agreement. The survey and monitoring shall be undertaken by appropriately qualified and experienced personnel using the correct equipment.

Reason:

To provide additional baseline survey data to ensure that the impacts of construction on occupiers of neighbouring properties and the wider environment by reason of pollution and nuisance are minimised, in accordance with policy SI1 Improving air quality of the London Plan (2021), P56 Protection of amenity and P65 Improving air quality of the Southwark Plan (2022), and to have regard to condition 20 of the outline planning permission.

7. SITE ENCLOSURE

No development shall commence until details of a scheme for temporary fencing, hoarding and/or enclosure have been submitted to and approved in writing by the Local Planning Authority. Any fencing, hoarding and/or enclosure shall be erected in accordance with the approved details and

therefore shall be retained for the duration of the building works.

Reason:

To ensure that the impacts during the construction on occupiers of neighbouring properties and the public park in terms of pollution and nuisance are minimised and in the interest of the visual amenity, in accordance with P56 Protection of amenity of the Southwark Plan (2022), and to have regard to condition 35 of the outline planning permission.

8. NOISE SURVEY

Before any works commence, a noise monitoring survey shall be undertaken by the developer and shall be submitted to and approved in writing by the Local Planning Authority. The noise monitoring survey shall include a background noise survey covering a minimum of one month's data and include measurements taken at all times of the day for the perimeter of the development. Monitoring shall take place throughout the construction phase to ensure the approved targets are met.

The noise monitoring survey details (monitoring locations, methodologies, frequency of results reporting) shall be submitted to the Local Planning Authority for approval in writing prior to the submission of the noise monitoring survey. The survey shall be carried out in accordance with the approval given. The noise trigger levels to inform the Construction Environmental Management Plan as required by the Section 106 Agreement shall be 70dB(A) Leq(10 hour) 10hr - 0800-1800hrs and 75dB(A) Leq(15 mins). The trigger levels shall not be exceeded without prior written consent by the Local Planning Authority. The survey and monitoring shall be undertaken by appropriately qualified and experienced personnel using the correct equipment.

Reason:

To provide additional baseline survey data to that in the 2020 Elephant Park Environmental Statement to ensure that the impacts of construction on occupiers of neighbouring properties and the wider environment by reason of pollution and nuisance are minimised in accordance with policies P56 Protection of amenity and P66 Reducing noise pollution and enhancing soundscapes of the Southwark Plan (2022), and to have regard to condition 21 of the outline planning permission.

9. VIBRATION SURVEY

Before any work commences a vibration monitoring survey shall be undertaken by the developer and shall be submitted to and approved in writing by the Local Planning Authority. The vibration monitoring survey shall include a building condition survey for relevant premises adjacent to the development and a background vibration survey covering a minimum of one week's data including measurements taken at all times of the day for the perimeter of the development. Monitoring shall take place throughout the construction phase to ensure the approved targets are met.

The vibration monitoring survey details (monitoring locations, methodologies, frequency of results reporting) shall be submitted to the Local Planning Authority for approval in writing prior to the submission of the vibration monitoring survey. The survey shall be carried out in accordance with the approval given and shall accord with standards set out in BS 6472-1:2008 and BS 5228-2:2009+A1:2014. The results of the survey shall be used to inform targets and monitoring requirements for the Construction Environmental Management Plan as required by the Section 106 Agreement. The survey and monitoring shall be undertaken by appropriately qualified and experienced personnel using the correct equipment.

Reason:

To provide additional baseline survey data to that in the 2020 Elephant Park Environmental Statement to ensure that the impacts of construction on occupiers of neighbouring properties and the wider environment by reason of pollution and nuisance are minimised in accordance with policies P56 Protection of amenity and P66 Reducing noise pollution and enhancing soundscapes of the Southwark Plan (2022), and to have regard to condition 22 of the outline planning permission.

10. SITE CONTAMINATION

Prior to the commencement of development, 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 (in consultation with the Environment Agency):

1. A site investigation scheme, based on the 'Phase 1 Geo-Environmental Assessment' by WYG (dated May 2021, ref.B024735 Rev V2) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site, and;
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, and;
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 written 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 (2021) paragraph 183 and policy P63 Contaminated land and hazardous

substances of the Southwark Plan (2022). The site is located over a Secondary Aquifer and it is understood that the site may be affected by historic contamination.

11. 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 (in consultation with the Environment Agency), which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason:

To ensure that the development does not harm groundwater resources in line with the National Planning Policy Framework (2021) paragraph 183, and policy P64 Contaminated land and hazardous substances of the Southwark Plan (2022). 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 recommends that where soil contamination is present, a risk assessment is carried out in accordance with our guidance 'Piling into Contaminated Sites' and will not permit piling activities on parts of a site where an unacceptable risk is posed to controlled waters.

12. BASEMENT LEVELS LAYOUT

Prior to the commencement of development, detailed plans at an appropriate scale of the Plot H1 basement levels shall be submitted to and approved in writing by the Local Planning Authority. The submitted details shall include the layout of each level, the lift cores, stair cores, cycle ramp and cycle lift. The development shall be carried out in accordance with the approved details.

Reason:

The applicant has indicated the submitted drawings are indicative only, so the Local Planning Authority needs to assess the detailed layout of the basement levels and ensure inclusive and convenient access to the cycle parking is provided in accordance with policies D5 Inclusive design and T5 Cycling of the London Plan (2021), P14 Design quality and P53 Cycling of the Southwark Plan (2022).

13. CYCLE PARKING FOR STAFF

Prior to the commencement of development, details (1:50 scale drawings) of the facilities to be provided for the secure and covered storage of cycles, and staff facilities shall be submitted to and approved in writing by the Local

Planning Authority. The details shall show the stand design(s) to provide at least 855 staff cycles for office, retail and health hub uses of the development (including at least 10 spaces for accessible cycles and at least 10 cargo cycle spaces) along with the shower facilities. The cycle parking facilities for staff shall be provided in accordance with the approved details prior to first occupation of the development, be retained and the space used for no other purpose and the development shall not be carried out otherwise in accordance with any such approval given.

Reason:

In order to ensure that satisfactory safe and secure cycle parking facilities are provided and retained in order to encourage the use of cycling as an alternative means of transport to the development and to reduce reliance on the use of the private car in accordance with the National Planning Policy Framework (2021), policy T5 Cycling of the London Plan (2021) and policy P53 Cycling of the Southwark Plan (2022).

14. HARD AND SOFT LANDSCAPING

Prior to works commencing, 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) including the roof terrace planting, climbing planting around the base of the building, green roof planting, and ground level planters shall be submitted to and approved in writing by the Local Planning Authority. The measures set out in the urban greening factor calculation to achieve a score of at least 0.351 shall be detailed and implemented in full. 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 prior to first occupation of the development.

Any tree or shrub that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years following the carrying out of the landscaping scheme (whichever is later), shall be replaced 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 Local Planning Authority may be satisfied with the details of the landscaping scheme, in accordance with: the National Planning Policy Framework (2021); policies G5 Urban greening and D8 Public realm of the London Plan (2021); policies P13 Design of places, P14 Design quality and P17 Tall buildings of the Southwark Plan (2022). Landscaping is necessary

to mitigate the anticipated wind conditions detailed in the Environmental Statement, and needs to be in place prior to first occupation of the development, in accordance with policy D9 Tall buildings of the London Plan (2021) and policy P17 Tall buildings of the Southwark Plan (2022). To have regard to the landscaping requirements of conditions 17 and 49 of the outline planning permission.

15. TREE PLANTING

Prior to works commencing, details of all proposed tree planting shall be submitted to and approved in writing by the Local Planning Authority. This will include tree pit cross sections, planting and maintenance specifications, use of guards or other protective measures and confirmation of location, species, sizes, nursery stock type, supplier and defect period, and make reference to how the proposal complies with the approved Elephant Park Site Wide Tree Strategy (approved pursuant to condition 9 of the outline planning permission). All tree planting shall be carried out in accordance with those details and at those times to be completed prior to the first occupation of the development. Planting shall comply with BS5837: Trees in relation to demolition, design and construction (2012) and BS: 4428 Code of practice for general landscaping operations.

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

Reason:

To ensure the proposed development will preserve and enhance the visual amenities of the locality and is designed for the maximum benefit of local biodiversity, in addition to the attenuation of surface water runoff, to dovetail with condition 9 of the outline permission, and in accordance with: the National Planning Policy Framework (2021), policy G7 Trees and woodland of the London Plan (2021), policies P13 Design of places and P61 Trees of the Southwark Plan (2022). Tree planting is necessary to mitigate the anticipated wind conditions detailed in the Environmental Statement and needs to be in place prior to first occupation of the development, in accordance with policy D9 Tall buildings of the London Plan (2021) and policy P17 Tall buildings of the Southwark Plan (2022).

16. SWIFT NESTING

Prior to works commencing, details of Swift nesting bricks/boxes shall be submitted to and approved in writing by the Local Planning Authority. No fewer than 18 nesting brick/boxes shall be provided and the details shall include the exact location, specification and design of the habitats.

The nesting bricks/boxes 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/boxes shall be installed strictly in accordance with the details so approved, shall be maintained as such thereafter.

Discharge of this condition will be granted on receiving the details of the nest/roost features and mapped locations and the Local Planning Authority agreeing the submitted plans, and once the nesting features are installed in full in accordance with the agreed plans. A post completion assessment will be required to confirm the nesting 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 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); and to have regard to condition 48 of the outline planning permission.

17. CIRCULAR ECONOMY

Prior to the commencement of development a Circular Economy Statement demonstrating compliance with Part B of Policy SI7 "Reducing waste and supporting the circular economy" of the London Plan (2021) and including measures for monitoring and reporting against the targets within the Circular Economy Statement shall be submitted and approved in writing by the Local Planning Authority. The assessment shall develop a strategy for the implementation of circular economy principles in both the approved building and the wider site's operational phase, in addition to developing an end-of-life strategy for the development according to circular economy principles, including disassembly and deconstruction. The development shall be carried out in accordance with the approved details.

Reason:

To promote resource conservation, waste reduction, material re-use, recycling and reduction in material being sent to land fill in compliance with Policy SI7 of the London Plan (2021).

18. WHOLE LIFE CARBON - PRE-COMMENCEMENT

Prior to the commencement of development a Whole Life-Cycle Carbon Assessment demonstrating compliance with Part F of Policy SI2 "Minimising greenhouse gas emissions" of the London Plan (2021), shall be submitted and approved in writing by the Local Planning Authority. This assessment shall develop a strategy for the implementation of whole life cycle carbon principles in the approved development's construction, operational and demolition phases. The development shall be carried out

in accordance with the approved details.

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).

19. 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 development and shall be implemented in accordance with the approved details prior to occupation:

b) Prior to first occupation of the development a satisfactory Secured by Design inspection must take place and the resulting Secured by Design certificate 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: the National Planning Policy Framework (2021); policy P16 Designing out crime of the Southwark Plan (2022), and to have regard to condition 47 of the outline planning permission.

20. FULL FIBRE CONNECTIVITY

Prior to the commencement of development, detailed plans shall be submitted to and approved in writing by the Local Planning Authority demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development. The development shall be carried out in accordance with the approved details.

Reason:

To provide high quality digital connectivity infrastructure to contribute to London's global competitiveness in accordance with policy SI6 of the London Plan (2021).

Permission is subject to the following Grade Condition(s)

21. 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, trees, terrace planters, roof planting, ground level landscaping, climbing planters and ecological features, shall be submitted to and approved in writing by the Local Planning Authority. The 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, in accordance with the National Planning Policy Framework (2021), London Plan (2021) policies G1, G5 and G6, and to ensure the management of the public realm in line with policy D8 Public realm of the London Plan (2021). This is a mandatory criteria of BREEAM (LE5) to monitor long term impact on biodiversity, a requirement is to produce a Landscape and Habitat Management Plan.

22. BIODIVERSE ROOFS

1) Before any above grade work hereby authorised begins, details of the biodiverse (green/brown) roof(s) shall be submitted to and approved in writing by the Local Planning Authority. The biodiverse 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).

2) Full discharge of this condition will be granted once the biodiverse roof(s) are completed in full in accordance with the agreed plans. A post completion assessment will be required to confirm the roof has been constructed to the agreed specification.

3) The biodiverse roof(s) 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.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with: policies SI 4 Managing heat risk, SI 13 Sustainable drainage, G1 Green Infrastructure, G5 Urban Greening of the London Plan (2021); and policy P60 Biodiversity of the Southwark Plan (2022), and to have regard to condition 49 of the outline planning permission.

23. MATERIALS

Prior to the commencement of any works above grade of the approved development, the following details shall be submitted to and approved in writing by the Local Planning Authority: samples of all facing materials, including

- a) the facade materials,
- b) fins,
- c) support columns with column "socks" and trellis,
- d) terrace enclosures,
- e) windows,
- f) doors,
- g) shopfronts,
- h) servicing yard entrance gates,
- i) perforated metal panels,
- j) louvres,
- k) facade pattern to metal components on Deacon Street, and
- l) plant screen enclosure.

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 policy D4 Delivering good design of the London Plan (2021), P14 Design quality of the Southwark Plan (2022) and to have regard to condition 50 of the outline planning permission. To allow consideration of solar glare from the facade materials informed by the solar glare assessment within the Environmental Statement.

24. DETAILED DRAWINGS

Prior to the commencement of any works above grade of the approved development, the following details shall be submitted to and approved in writing by the Local Planning Authority:

- a) 1:20 scale contextual sections;
- b) 1:50 elevations to show the fin pattern to each side of the building, how it wraps around the corners and the terraces; and
- c) 1:10 and 1:20 scale details of the fins, windows, doors, service yard entrance, louvres, column bases, curved ground floor facade, roof terrace enclosures and roof plant screening.

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 policy D4 Good quality design of the London Plan (2021) and P14 Design quality of the Southwark Plan (2022), and to have regard to condition 51 of the outline planning permission.

25. DESIGN MOCK UPS

Full-scale mock-ups of the facades shall be presented on site (or near to the site) and approved in writing by the Local Planning Authority before any construction work above grade of the approved building. 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. 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 policy D4 Delivering good design of the London Plan (2021), policy P14 of the Southwark Plan (2022) and to have regard to condition 50 of the outline planning permission.

26. SHOPFRONTS AND SIGNAGE

Before any works hereby authorised begin above grade, a Shopfront and Signage Strategy detailing the design code(s) for the proposed frontages of the commercial, retail, health units (including materials, advertisement zones, awnings, the extent and demarcation of any spill out zones, and any revised shopfront designs from those on the approved drawings), and how it has regard to the approved Elephant Park site wide advertising and signage strategy shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details.

Reason:

In order to ensure that the quality of the design, details, inclusive access and public realm accessibility remain high, in accordance with policies D4 Delivering good design, D8 Public realm and D9 Tall buildings of the London Plan (2021), and P14 Design quality of the Southwark Plan (2022), and to have regard to condition 14 of the outline planning permission.

27. FLOOR LAYOUTS

Before any works hereby authorised begin above grade, detailed plans at an appropriate scale of the Plot H1 ground floor and upper floors shall be submitted to and approved in writing by the Local Planning Authority. The submitted details shall include the ground floor layout showing the entrances to and layout of the active lobby, all office/retail/health units, associated service corridors, lift cores and stair cores, service yard and refuse storage, and to show the cores of the upper floors. No outward opening doors will be permitted except those that are solely fire escapes, infrequently used plant rooms, or agreed in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason:

The applicant has indicated the submitted floorplans are indicative only, so the Local Planning Authority needs to assess the detailed layout and in order to allow flexibility for the scheme to maximise the provision of active frontages, to have confirmation of the size of the retail/health/office units, inclusive access throughout the building, sufficient refuse storage and in the interest of highway safety in accordance with policies D5 Inclusive design of the London Plan (2021) and P14 Design quality of the Southwark Plan (2022).

28. ROOF TOP PLANT LAYOUT

Before any works hereby authorised begin above grade, detailed plans at an appropriate scale of the Plot H1 roof top plant and screening shall be submitted to and approved in writing by the Local Planning Authority. The submitted details shall include the layout of the plant, the screening enclosure, and the height and appearance of the screening, BMU, plant and associated railings, gantries and ancillary structures. The development shall be carried out in accordance with the approved details.

Reason:

The applicant has indicated the submitted roof plan drawing and screening elevation drawings are indicative only, so the Local Planning Authority needs to assess the detailed layout and appearance of the top of this tall building and ensure the plant etc is screened, in the interest of the character of the area and preservation of the LVMF view of the World Heritage Site, in accordance with policies D9 Tall buildings, HC2 World heritage sites and HC4 London View Management Framework of the London Plan (2021) and P14 Design quality, P17 Tall buildings, P24 World heritage sites of the Southwark Plan (2022).

29. TV, RADIO AND TELECOMMS IMPACTS

Before any above grade work hereby authorised begins, details of how the impact of the development on television, radio and other telecommunications services will be assessed, the method and results of surveys carried out, and the measures to be taken to rectify any problems identified shall be submitted to and approved in writing by the Local Planning Authority. The development shall not be occupied until any such mitigation measures as may have been approved have been implemented.

Reason:

In order to ensure that any adverse impacts of the development on reception of properties in the area is identified and resolved satisfactorily in accordance with the National Planning Policy Framework (2021), D9 Tall buildings of the London Plan (2021), and P17 Tall buildings of the Southwark Plan (2022).

30. WAYFINDING AND SIGNAGE

Before any above grade work hereby authorised begins, a wayfinding and signage strategy for the development and its public realm, including demonstrating how it fits into the wider Elephant Park masterplan wayfinding and signage, shall be submitted to and approved in writing by the Local Planning Authority. The wayfinding measures and signage shall be installed in accordance with the approved details prior to first occupation of the development.

Reason:

To ensure a legible development that assists with wayfinding in the area as part of the connectivity improvements, to accord with London Plan (2021) policy D8 Public realm and P51 Walking of the Southwark Plan (2022).

31. EVCP

Before any above grade work hereby authorised begins, details of the electric vehicle charging points (EVCP) to be provided within the development shall be submitted to and approved in writing by the Local Planning Authority. Such details are to include the number and location of vehicle spaces the EVCP would serve (at minimum the two parking spaces on the north side of Deacon Street), and appearance of the equipment. The EVCP shall be installed in accordance with the approved details and made available for use prior to the first occupation, and retained as such.

Reason:

To accord with policy T6 Car parking of the London Plan (2021) and P54 Car parking of the Southwark Plan (2022).

32. REFUSE STORAGE AND COLLECTION

Before any above grade work hereby authorised begins, details of the storage for refuse and recycling for all uses within the development, and arrangements for its collection from within the servicing yard shall be submitted to and approved in writing by the Local Planning Authority. The storage arrangements shall be laid out in accordance with the approved details ready for use prior to first occupation of the development, and the collection arrangements shall be undertaken in accordance with the approved details. The facilities shall thereafter be retained for refuse and recycling, and the space used for no other purpose without the prior written consent of the Local Planning Authority.

Reason:

To ensure that suitable facilities for the storage of refuse are provided and retained in the interest of protecting the amenity of the site and the area in general from litter, odour and potential vermin/pest nuisance in accordance with policy SI7 Reducing waste and supporting the circular economy of the London Plan (2021) and policies P56 Protection of amenity and P62 of the Southwark Plan (2022).

33. KITCHEN EXTRACTION AND ODOUR

A) Prior to the commencement of above ground works, details of the location(s) of ducting to be installed from the ground floor units and lobby areas (that may contain a commercial kitchen) up through the building to the roof level and details of the height and type of flue(s) shall be submitted to and approved by the Local Planning Authority. The development shall be constructed in accordance with the approved details.

B) Prior to the commencement of use of any commercial unit where food will be prepared, full particulars and details of a kitchen extract scheme for the ventilation of the kitchen to the appropriate outlet level approved in Part A shall be submitted to and approved by the Local Planning Authority. Such application should include details of odour emissions abatement equipment, sound attenuation for any necessary plant, filtration systems and the standard of dilution of exhaust air expected, and a maintenance plan for its ongoing management. 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 be at roof level, to not result in 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) and P56 Protection of amenity of the Southwark Plan (2022).

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

34. FOUL WATER, SURFACE WATER AND WATER NETWORK INFRASTRUCTURE

The development shall not be occupied until confirmation has been submitted to and approved in writing by the Local Planning Authority (in consultation with Thames Water) that either:

1. All wastewater network upgrades, all surface water network upgrades and all water network upgrades required to accommodate the additional flows to and from the development have been completed;

or

2. A development and infrastructure phasing plan has been agreed with the Local Planning Authority (in consultation with Thames Water) to allow development to be occupied.

Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.

Reason:

Thames Water has identified an inability of the existing water network

infrastructure, surface water infrastructure, and foul water network infrastructure to accommodate the needs of this development. Network reinforcement works are likely to be required to accommodate the proposed development. The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development. The condition is necessary to ensure compliance with policy S15 Water infrastructure of the London Plan (2021) and IP1 Infrastructure of the Southwark Plan (2022), and to have regard to condition 27 of the outline planning permission.

35. MOVEABLE PLANTERS

Prior to the occupation of the development and notwithstanding the information shown on the approved landscaping drawings, details of the number (no fewer than 7), size, appearance, planting, location areas of the "moveable" planters near the eastern and south eastern side of the building shall be submitted to and approved by the Local Planning Authority. The details shall include information on how the planters are to be retained with the suggested areas at all times, and how the planting and planters are to be maintained. The planters shall be placed and retained in accordance with the approved details.

Reason:

So that the Local Planning Authority may be satisfied with the details of the landscaping of the public realm and as part of the mitigation for wind conditions detailed in the Environmental Statement which needs to be in place prior to first occupation, to accord with policies D8 Public realm and D9 Tall buildings of the London Plan (2021), P13 Design of places and P17 Tall buildings of the Southwark Plan (2022).

36. FLOOD EVACUATION

As the site is at residual risk from and within a breach zone of the River Thames, a 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, in accordance with the S12 Flood risk management of the London Plan (2021) and P68 Reducing flood risk of the Southwark Plan (2022).

37. VERIFICATION REPORT

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 (in consultation with the Environment Agency). 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 (2021) paragraph 183, and policy P64 Contaminated land and hazardous substances of the Southwark Plan (2022), and have regard to condition 32 of the outline planning permission.

38. CYCLE PARKING FOR VISITORS

Prior to occupation of the development, details (1:50 scale drawings) of the number, locations and design(s) of the cycle parking facilities to be provided for visitors shall be submitted to and approved in writing by the Local Planning Authority. The details show how the number of spaces has been informed by the policy requirements of the London Plan and Southwark Plan for the intended occupier uses of the development. The cycle spaces shall be additional to those already approved for other parts of the Elephant Park masterplan. The cycle parking facilities for visitors shall be provided in accordance with the approved details prior to first occupation of the development, be retained and the space used for no other purpose and the development shall not be carried out otherwise in accordance with any such approval given.

Reason:

In order to ensure that satisfactory safe and secure cycle parking facilities are provided and retained in order to encourage the use of cycling as an alternative means of visitor 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).

Permission is subject to the following Compliance Condition(s)

39. RETAINED TREES - ARBORICULTURAL METHOD STATEMENT

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 (including facilitative pruning specifications and supervision schedule) contained in the Arboricultural Method Statement dated May 2021. 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), G7 Trees and woodlands of the London Plan (2021), P59 Green infrastructure, P60 Biodiversity and P61 Trees of the Southwark Plan (2022), and to have regard to condition 26 of the outline planning permission.

40. 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 or enactment of those Orders), and notwithstanding the other uses within Class E:

- the office floorspace hereby approved shall be used for Use Class E(g)(i) office purposes only;
 - the health floorspace hereby approved shall be used for Use Class E(e) health hub purposes only;
 - the retail floorspace hereby approved shall be used for Use Class E(a), E(b) and/or E(c) retail, professional services and/or cafe and restaurant purposes only;
 - the ancillary floorspace hereby approved shall be used for ancillary purposes to the above uses only;
- unless otherwise agreed by way of a formal application for planning permission.

Reason:

In order to ensure that the site provides office use, retail use and potential health hub use for this site within the Central Activities Zone, Opportunity Area and town centre in line with its assessment, to comply with policies SD1 Opportunity Areas, SD4 The Central Activities Zone, SD5 Offices and other strategic functions and residential development in the CAZ, SD6

Town centres and high streets, E2 Providing suitable business space, E3 Affordable workspace and S2 Health and social care facilities of the London Plan (2021), AV.09 area vision and policies P30 Offices and business development, P31 Affordable workspace, P35 Town and local centres and P47 Community uses of the Southwark Plan (2022) and as other Class E uses may have different impacts than those assessed within the Environmental Statement and application.

41. SURFACE WATER DRAINAGE

The surface water drainage shall be installed prior to the occupation of the development and maintained in accordance with the approved Drainage Strategy by Robert Bird Group dated 17 February 2022, unless details of a revised drainage scheme are submitted to and approved in writing by the Local Planning Authority prior to installation.

Reason:

To prevent the increased risk of flooding and to improve and protect water quality, improve habitat in accordance with policy SI13 Sustainable design of the London Plan (2021) and P68 Reducing flood risk of the Southwark Plan (2022) and to have regard to condition 28 of the outline planning permission.

42. SURFACE WATER DRAINAGE/INFILTRATION

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 in advance of the system's installation, 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 (2021) paragraph 183, policy P64 Contaminated land and hazardous substances of the Southwark Plan (2022), and to have regard to condition 29 of the outline planning permission. Infiltrating water has the potential to cause remobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of groundwater.

43. FLOOD RISK

The development hereby permitted shall be carried out in accordance with the recommendations of the approved Flood Risk Assessment prepared by RMA Environmental dated May 2021, unless a revised flood risk assessment is submitted to and approved in writing by the Local Planning

Authority prior to the relevant works being carried out.

Reason:

To ensure the development is designed safely in reference to flood risk, in accordance with policy SI2 Flood risk management of the London Plan (2021) and P68 Reducing flood risk of the Southwark Plan (2022).

44. UNEXPECTED CONTAMINATION

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for a remediation strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as approved, verified and reported to the satisfaction of the Local Planning Authority.

Reason:

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 from previously unidentified contamination sources at the development site. This is in line with the National Planning Policy Framework (2021) paragraph 183, policy P64 Contaminated land and hazardous substances of the Southwark Plan (2022), and to have regard to condition 31 of the outline planning permission. The site is located over a Secondary Aquifer and it is understood that the site may be affected by historic contamination.

45. FIRE STATEMENT

The development hereby permitted shall be carried out in accordance with the Fire Statement by OFR Consultants dated May 2021, unless a revised fire statement is submitted to and approved in writing by the Local Planning Authority prior to the relevant works being carried out.

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).

46. 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(s) 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, the visual amenity of the area and LVMF view in accordance with the National Planning Policy Framework (2021), policy HC4 London View Management Framework of the London Plan (2021), and policy P14 Design Quality of the Southwark Plan (2022).

47. RESTRICTION ON THE INSTALLATION OF TELECOMMUNICATIONS EQUIPMENT

Notwithstanding the provisions of Schedule 2 Part 16 The Town and Country Planning (General Permitted Development) Order 2015 (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, visual amenity of the area and LVMF view is installed on the roof of the building in accordance with: the National Planning Policy Framework (2021), HC4 London View Management Framework of the London Plan (2021), and policy P14 Design quality of the Southwark Plan (2022).

48. WINDOWS

The approved window openings to the building shall be clear glass and shall not be painted, covered or otherwise obscured or obstructed without prior written consent of the Local Planning Authority.

Reason:

In order that the Local Planning Authority may be satisfied as to the design of this building, in the interest of its appearance and its frontage remaining active and retaining a relationship with the public realm and streets in accordance with policies D4 Good quality design of the London Plan (2021), P14 Design quality of the Southwark Plan (2022) and to dovetail with condition 52 of the outline planning permission.

49. HOURS OF USE OF TERRACES

Other than for maintenance purposes, repair purposes or means of escape, the terraces of the building hereby approved shall not be used outside of the following hours: 08:00 - 22:00 on Mondays to Fridays.

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) and policy P56 Protection of amenity of the Southwark Plan (2022).

Permission is subject to the following Special Condition(s)

50. ARBORICULTURAL SITE SUPERVISION

The completed schedule of site supervision and monitoring of the arboricultural protection measures as approved in the tree protection condition shall be submitted for approval in writing by the Local Planning Authority within 28 days of 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 measures 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), policies G7 Trees and woodlands of the London Plan (2021) and P61 Trees of the Southwark Plan (2022).

51. 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 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 BS 4142:2014.

Prior to the plant being commissioned a validation test shall be carried out following completion of the development. The results along with details of any acoustic mitigation measures shall be submitted to and approved by the Local Planning Authority. The plant and equipment shall be installed, constructed and operated in accordance with the approval given and shall be permanently maintained thereafter.

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the National Planning Policy Framework (2021), and policy P56 Protection of amenity of the Southwark Plan (2022).

52. BREEAM REPORT AND POST CONSTRUCTION REVIEW

(a) Before any fit out works to the office premises or health hub (if this use is implemented) 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 an '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 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 tall building proposal achieves the exemplary sustainability standards included in the proposed scheme and complies with Chapter 14 (Meeting the challenge of climate change, flooding and coastal change) of the National Planning Policy Framework (2021), policies SI2 (Minimising greenhouse gas emissions) and SI5 (Water infrastructure) of the London Plan (2021), and policy P68 Sustainability standards of the Southwark Plan (2022).

53. POST COMPLETION CIRCULAR ECONOMY REPORT

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

Reason:

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

54. WHOLE LIFE CARBON - POST OCCUPATION

Within 12 months of first occupation of the development, an updated Whole Life-Cycle Carbon Assessment demonstrating compliance with Part F of Policy SI2 "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 the recommendations set out in the approved pre-commencement Whole Life-Cycle Carbon Assessment.

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).

55. ARCHAEOLOGICAL REPORTING

On completion of all works in the final construction phase of the Elephant Park masterplan or the approved Plot H1 development, whichever is the later, a detailed final assessment archaeological report covering the entire Elephant Park development site shall be submitted to and approved in writing by the Local Planning Authority.

Reason:

To have regard to condition 34 part b) of the outline planning permission as Plot H1 may be the final phase of the masterplan, in order that the archaeological interests of the site and wider masterplan are secured with regard to the details of the post-evacuation works, publication and archiving to ensure the preservation of archaeological remains by record in accordance with the NPPF, policy HC1 Heritage conservation and growth of the London Plan (2021), and policy P23 Archaeology of the Southwark Plan (2022).

56. LIGHTING AND SECURITY EQUIPMENT

Details of the lighting (including: design; power and position of luminaries; light intensity contours) of external areas (which may include areas beyond the boundary of the development) and the exterior of the building, security surveillance equipment and vehicle mitigation measures shall be submitted to and approved by the Local Planning Authority prior to the installation of any such equipment. Prior to the external lighting being commissioned for use, a validation report shall be submitted to the Local Planning Authority for approval in writing. The development shall not be carried out or operated otherwise than in accordance with any such approval given. Any external lighting system installed at the development shall comply with the Institute of Lighting Professionals (ILE) Guidance Note 1 for the reduction of obtrusive light (2020).

Reason:

In order that the Council may be satisfied as to the details of the development in the interest of the security of the development, railway safety, the visual amenity of the area, the amenity and privacy of adjoining occupiers, and their protection from light nuisance, in accordance with the

National Planning Policy Framework (2021), policy D11 Safety, security and resilience to emergency of the London Plan (2021) and P56 Protection of amenity of the Southwark Plan (2022), and to have regard to condition 46 of the outline planning permission.

RECOMMENDATION

LBS Registered Number: 21/AP/1819

Date of issue of this decision:



www.southwark.gov.uk

Informative Notes to Applicant Relating to the Proposed Development

1. The applicant is advised of the following highway matters.

Detailed designs and method statements (AIP) for foundations and basement structures retaining the highway (temporary and permanent) in accordance with CG 300 'Technical Approval of Highway Structures' should be submitted and approved by the Highway Authority prior to works commencing. Please contact Anthony Davies at Anthony.Davis@southwark.gov.uk for further information.

Prior to works commencing on site (including any demolition) a joint condition survey should be arranged with Southwark Highway Development Team to catalogue condition of streets and drainage gullies. Please contact Hernan Castano, Highway Development Manager on 020 7525 4706 to arrange.

The applicant will be required to enter into an s278 agreement under the Highways Act 1980 for any works to existing adopted highways. The Highway Authority requires works to all existing and any proposed new streets and spaces (given for adoption or not) to be designed and constructed to adoptable standards. Southwark Council's published adoptable standards as Highway Authority are contained in the Southwark Streetscape Design Manual (SSDM), <https://www.southwark.gov.uk/transport-and-roads/asset-management-and-streetscape-design/southwark-streetscape-design-manual-ssdm>

Since the application site falls within 'Town Centre' designation, the footways should be paved with granite natural paving slabs and 300mm wide granite kerbs. This can be secured through an s106 Agreement and s278 Agreement.

Should any part of the building overhang the public highway, the structure must be designed in accordance with TD27/05.

The applicant is to note that surface water from private areas is not permitted to flow onto public highway in accordance with Section 163 of the Highways Act 1980. Detailed drawings should be submitted as part of the s278 application confirming this requirement.

2. The applicant is advised to take account of the comments from Thames Water (TW).

Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the TW website at thameswater.co.uk/preplanning.

A Groundwater Risk Management Permit from TW will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. TW would expect the developer to demonstrate what measures it will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. Pre-treatment, separate metering, sampling access etc may be required before the Company can give its consent. Applications should be made at <https://wholesale.thameswater.co.uk/Wholesale-services/Business-customers/Trade-effluent> or alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.

Thames Water would recommend that petrol/oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol/oil interceptors could result in oil-polluted discharges entering local watercourses.

As per Building Regulations part H paragraph 2.21, drainage serving kitchens in commercial hot food premises should be fitted with a grease separator complying with BS EN 1825-:2004 and designed in accordance with BS EN 1825-2:2002 or other effective means of grease removal. Thames Water further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses. Please refer to TW's website for further information: www.thameswater.co.uk/help

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

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

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 TW's guide 'working near our assets' to ensure the workings are in line with the necessary processes you need to follow if considering working above or near 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

Wastewater: Thames Water does not have mapped any sewers on Deacon St. If those are private and flow do not enter the public sewer network until they reach the 1524x1016 trunk sewer on Walworth Road, then there is no capacity concerns from TW for foul and surface water. Given the dimensions of the spurs on Deacon St, regardless of ownership, there are potential capacity concerns there. If upgrades are proposed, no new connections into the trunk sewers can be made. To discharge TW's condition, please provide clarity on ownership and the point where the flows connect into the public sewers.

Connecting directly into a trunk or chemical sewer can be complex and dangerous, therefore they should only be considered where no alternative points of connection to local sewers are available. TW does not allow connections to trunk sewers in greater London - instead, you will need to choose an alternative point of connection to a non-trunk sewer or requisition a new connection and associated pipe laying from TW. If you apply for a requisition TW will select a suitable connection point, which may not be your preferred connection point. Where a connection into a trunk or chemical sewer is necessary, TW will insist on carrying out the work themselves and recharge you under Section 107 of the Water Industry Act 1991. An application to connect must be submitted to Thames Water developer services as early as possible to allow time to conduct technical reviews and surveys as required - costs will apply. Please see more information on the application process for connecting into a trunk or chemical sewer <https://developers.thameswater.co.uk/Domestic-and-small-commercial/Wastewater/Connecting-to-a-trunk-or-chemical-sewer>.

Even though there is capacity in the trunk sewer [not Deacon St] to accept the surface water discharge rate provided as part of the enquiry, however this does not preclude the requirement as set out by the London Plan. Management of surface water from the site should follow the London Plan, development should 'aim to achieve greenfield run-off rates' utilising Sustainable Drainage and where this is not possible information explaining why it is not possible should be provided to both the LLFA and Thames Water. Typically greenfield run off rates of 5l/s/ha should be aimed for using the drainage hierarchy. The hierarchy lists the preference for surface water disposal as follows; Store Rainwater for later use > Use infiltration techniques, such as porous surfaces in non-clay areas > Attenuate rainwater in ponds or open water features for gradual release > Discharge rainwater

direct to a watercourse > Discharge rainwater direct to a surface water sewer/drain > Discharge rainwater to the combined sewer. Discharges to combined sewers should be separate onsite and combine only prior to the final manhole before the connection. On Surface Water Drainage Sheet 3 of 4 there is a second surface water connection with a hydrobrake of 11 l/s in addition to the 24 l/s from the building. This second connection is not discussed. TW query whether it is part of this application and if not has it been approved.

The 50% reduction from existing discharge rates is the 'minimum expectation' as stated in the London Plan Sustainable Design and Construction SPG. As per London Plan policy 5.13, each individual plot should therefore 'aim to achieve greenfield run-off rates' utilising SuDS, and where this is not possible, information as to why it is not possible to be provided. The proposed surface water plan does not provide 50% reduction from existing discharge rates for the 1 in 1 year storm event, it is only 44%. While we do prefer gravity connections over pumped connections, that is secondary to meeting greenfield run off rates as specified in the Policy 5.13 of the London Plan. To discharge this condition, either limit surface water flows to greenfield runoff rates or provide evidence that it is not achievable, considering a pumped connection. Also address the second 11 l/s connection.

3. The applicant is advised to contact London Underground Infrastructure Protection in advance of preparation of final design and associated method statements, in particular with regard to: demolition; excavation and construction methods. The response from LUIP is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.
4. The applicant is advised to note the following advice from Network Rail (NR) in terms of asset protection for works in close proximity to NR's infrastructure.

Due to the close proximity of the proposed works to NR's land and the operational railway, NR requests the applicant/developer engages NR's Asset Protection and Optimisation (ASPRO) team via AssetProtectionLondonSouthEast@networkrail.co.uk prior to works commencing. This will allow the ASPRO team to review the details of the proposal to ensure that the works can be completed without any risk to the operational railway.

The applicant/developer may be required to enter into an Asset Protection Agreement to get the required resource and expertise on-board to enable approval of detailed works. More information can also be obtained from NR's website <https://www.networkrail.co.uk/running-the-railway/looking-after-the-railway/asset-protection-and-optimisation/>.

The developer must ensure that their proposal, both during construction and after completion does not: encroach onto NR land; affect the safety, operation or integrity of the company's railway and its infrastructure; undermine its support zone; damage the company's infrastructure; place additional load on cuttings; adversely affect any railway land or structure; over-sail or encroach upon the air-space of any NR land; cause to obstruct or interfere with any works or proposed works or NRI development both now and in the future. NR strongly recommends the developer complies with the following comments and requirements to maintain the safe operation of the railway and protect NR's infrastructure.

Future maintenance

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 NR's adjacent land and air-space. Therefore, any buildings are required to be situated at least 2 metres (3m for overhead lines and third rail) from NR's boundary. This requirement will allow for the construction and future maintenance of a building without the need to access the operational railway environment. 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 NR land and air-space to facilitate works as well as adversely impact upon NR's maintenance teams' ability to maintain our boundary fencing and boundary treatments. Access to NR's land may not always be granted and if granted may be subject to railway site safety requirements and special provisions with all associated railway costs charged to the applicant.

As mentioned above, any works within NR's land would need approval from the NR Asset Protection Engineer. This request should be submitted at least 20 weeks before any works are due to commence on site and the applicant is liable for all associated costs (e.g. all possession, site safety, asset protection presence costs). However, NR is not required to grant permission for any third-party access to its land.

Plant and Materials

All operations, including the use of cranes or other mechanical plant working adjacent to NR'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 NR.

Drainage

Storm/surface water must not be discharged onto NR's property or into NR's culverts or drains except by agreement with NR. Suitable drainage or other works must be provided and maintained by the Developer to prevent surface water flows or run-off onto NR's property. Proper provision must be made to accept and continue drainage discharging from NR's property; full details to be submitted for approval to the NR Asset Protection Engineer. Suitable foul drainage must be provided separate from NR's existing drainage.

Soakaways, as a means of storm/surface water disposal must not be constructed within 20 metres of NR's boundary or at any point which could adversely affect the stability of NR'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.

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 NR'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 NR land. NR's existing fencing / wall must not be removed or damaged and at no point during or post construction should the foundations of the fencing or wall or any embankment therein, be damaged, undermined or compromised in any way. Any vegetation within NR's land boundary must not be disturbed. Any fencing installed by the applicant must not prevent NR 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 NR'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 NPPF 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, NR 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

Any trees/shrubs 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. NR wish to be involved in the approval of any landscaping scheme adjacent to the railway. If required, NR's Asset Protection team are able to provide more details on which trees/shrubs are permitted within close proximity to the railway.

Property Rights

The applicant must identify and comply with all existing rights on the land. NR request all existing rights, covenants and easements are retained unless agreed otherwise with NR. Notwithstanding the above, if any property rights are required from NRIL in order to deliver the development, NRIL's Property team will need to be contacted.

To discuss any of the above, please contact the local NR's Asset Protection team: Kent and Sussex:

AssetProtectionLondonSouthEast@NetworkRail.co.uk

5. The applicant is advised of the comment from London Fire Brigade as follows. If there are any deviations from the guidance in ADB) vol 1 and 2: B5 Access and facilities for the fire service in relation to water provisions, then this information needs to be provided to the Water Office (water@london-fire.gov.uk) to discuss the proposed provision. If there are any deviations to Brigade access and facilities, then this information needs to be provided to Fire Safety Regulation (FSR-AdminSupport@london-fire.gov.uk) to review the proposed provision.

6. Paragraph 3.12.9 of Policy D12 explains that Fire Statements should be produced by someone who is "third-party independent and suitably-qualified". The Council considers this to be a qualified engineer with relevant experience in fire safety, such as a chartered engineer registered with the Engineering Council by the Institution of Fire Engineers, or a suitably qualified and competent professional with the demonstrable experience to address the complexity of the design being proposed. This should be evidenced in the fire statement. The Council accepts Fire Statements in good faith on that basis. The duty to identify fire risks and hazards in premises and to take appropriate action lies solely with the developer.

The fire risk assessment/statement covers matters required by planning policy. This is in no way a professional technical assessment of the fire risks presented by the development. The legal responsibility and liability lie with

the 'responsible person'. The responsible person being the person who prepares the fire risk assessment/statement not planning officers who make planning decisions.

Important Notes Relating to the Council's Decision

1. Conditions

- If permission has been granted you will see that it may be subject to a number of planning conditions. They are an integral part of our decision on your application and are important because they describe how we require you to carry out the approved work or operate the premises. It is YOUR responsibility to comply fully with them. Please pay particular attention to those conditions which have to be met before work commences, such as obtaining approval for the siting and levels of buildings and the protection of trees on the site. If you do not comply with all the conditions in full this may invalidate the permission.
- Further information about how to comply with planning conditions can be found at:

https://www.planningportal.co.uk/info/200126/applications/60/consent_types/12

- Please note that there is a right of appeal against a planning condition. Further information can be found at:

https://www.planningportal.co.uk/info/200207/appeals/108/types_of_appeal

2. Community Infrastructure Levy (CIL) Information

- If your development has been identified as being liable for CIL you need to email [Form 1: CIL Additional Information](#), [Form 2: Assumption of Liability](#) and [Form 6: Commencement Notice](#) to cil.s106@southwark.gov.uk as soon as possible, so that you can be issued with a Liability Notice. This should be done at least a day before commencement of the approved development.
- **Payment of the CIL charge is mandatory and the CIL Regulations comprises a range of enforcement powers and penalties for failure to following correct procedures to pay, including stop notices, surcharges, late payment interests and prison terms.**
- To identify whether your development is CIL liable, and further details about CIL including eligibility and procedures for any CIL relief claims, please see the Government's CIL guidance:

<https://www.gov.uk/guidance/community-infrastructure-levy>

- All CIL Forms are available to download from Planning Portal:

https://www.planningportal.co.uk/info/200136/policy_and_legislation/70/community_infrastructure_levy/5

- Completed forms and any CIL enquiries should be submitted to cil.s106@southwark.gov.uk

3. National Planning Policy Framework

- In dealing with this application we have implemented the requirements in the National Planning Policy Framework to work with the applicant/agent in a positive, proactive and creative way by offering a pre-application advice service; as appropriate updating applicants/agents of any issues that may arise in the processing of their application and where possible and if applicable suggesting solutions to secure a successful outcome. We have considered the application in light of our statutory policies in our development plan as set out in the officer's report.

4. Appeals to the Secretary of State

- If you are aggrieved by the decision of your local planning authority to grant it subject to conditions, then you can appeal to the Secretary of State under section 78 of the Town and Country Planning Act 1990.

Appeals can be made online at: <https://www.gov.uk/planning-inspectorate>.

If an enforcement notice is or has been served relating to the same or substantially the same land and development as in your application and if you want to appeal against your local planning authority's decision on your application, then you must do so within: **28 days** of the date of service of the enforcement notice, OR within **6 months** (12 weeks in the case of a householder or minor commercial appeal) of the date of this notice, whichever period expires earlier.

- The Secretary of State can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.
- The Secretary of State need not consider an appeal if it seems to the Secretary of State that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.
- If you intend to submit an appeal that you would like examined by inquiry then you must notify the Local Planning Authority and Planning Inspectorate (inquiryappeals@planninginspectorate.gov.uk) at least 10 days before submitting the appeal.
- Further details are on GOV.UK (<https://www.gov.uk/government/collections/casework-dealt-with-by-inquiries>).

5. Purchase Notice

- If either the local planning authority or the Secretary of State grants permission subject to conditions, the owner may claim that the land can neither be put to a reasonably beneficial use in its existing state nor made capable of reasonably beneficial use by the carrying out of any development which has been or would be permitted. In these circumstances the owner

may serve a purchase notice on the Council requiring the Council to purchase the owner's interest in the land in accordance with Part VI of the Town and Country Planning Act 1990

6. Provisions for the Benefit of the Disabled

- Applicants are reminded that account needs to be taken of the statutory requirements of the Disability Discrimination Act 1995 to provide access and facilities for disabled people where planning permission is granted for any development which provides:
 - i. Buildings or premises to which the public are to be admitted whether on payment or otherwise. [Part III of the Act].
 - ii. Premises in which people are employed to work as covered by the Health and Safety etc At Work Act 1974 and the Management of Health and Safety at Work Regulations as amended 1999. [Part II of the Act].
 - iii. Premises to be used as a university, university college or college, school or hall of a university, or intended as an institution under the terms of the Further and Higher Education Act 1992. [Part IV of the Act].
- Attention is also drawn to British Standard 8300:2001 Disability Access, Access for disabled people to schools buildings – a management and design guide. Building Bulletin 91 (DfEE 99) and Approved Document M (Access to and use of buildings) of the Building Regulations 2000 or any such prescribed replacement.

7. Other Approvals Required Prior to the Implementation of this Permission.

- The granting of approval of a reserved matter or outstanding matter does not relieve developers of the necessity for complying with any Local Acts, regulations, building by-laws and general statutory provisions in force in the area, or allow them to modify or affect any personal or restrictive covenants, easements, etc., applying to or affecting either the land to which the permission relates or any other land or the rights of any persons or authorities (including the London Borough of Southwark) entitled to the benefits thereof or holding an interest in the property concerned in the development permitted or in any adjoining property. In this connection applicants are advised to consult the council's Highway Maintenance section [tel. 020-7525-2000] about any proposed works to, above or under any road, footway or forecourt.

8. Works Affecting the Public Highway

- You are advised to consult the council's Highway Maintenance section [tel. 020-7525-2000] about any proposed works to, above or under any road, footway or forecourt.

9. The Dulwich Estate Scheme of Management

- Development of sites within the area covered by the Scheme of Management may also require the permission of the Dulwich Estate. If your property is in

the Dulwich area with a post code of SE19, 21, 22, 24 or 26 you are advised to consult the Estates Governors', The Old College, Gallery Road SE21 7AE [tel: 020-8299-1000].

10. Building Regulations.

- You are advised to consult Southwark Building Control at the earliest possible moment to ascertain whether your proposal will require consent under the Building Act 1984 [as amended], Building Regulations 2000 [as amended], the London Building Acts or other statutes. A Building Control officer will advise as to the submission of any necessary applications, [tel. call centre number 0845 600 1285].

11. The Party Wall Etc. Act 1996.

- You are advised that you must notify all affected neighbours of work to an existing wall or floor/ceiling shared with another property, a new building on a boundary with neighbouring property or excavation near a neighbouring building. An explanatory booklet aimed mainly at householders and small businesses can be obtained from the Department for Communities and Local Government [DCLG] Free Literature tel: 0870 1226 236 [quoting product code 02BR00862].

12. Important

- This is a PLANNING PERMISSION only and does not operate so as to grant any lease, tenancy or right of occupation of or entry to the land to which it refers.

APPENDIX 2**Planning policies and material considerations**National Planning Policy Framework

1. The revised National Planning Policy Framework ('NPPF') was published on 20 July 2021 which sets out the national planning policy. 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 relevant sections are:
 - 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 15 Conserving and enhancing the natural environment
 - Chapter 16 Conserving and enhancing the historic environment.

The London Plan 2021

2. 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
 - SD1: Opportunity Areas
 - SD4: The Central Activities Zone
 - SD6: Town centres and high streets
 - SD7: Town centres development principles and Development Plan Documents
 - D1: London's form, character and capacity for growth
 - D2: Infrastructure requirements for sustainable densities
 - D3: Optimising site capacity through the design-led approach
 - D4: Delivering good design
 - D5: Inclusive design
 - D8: Public realm
 - D9: Tall buildings
 - D10: Basement development
 - D11: Safety, security and resilience to emergency
 - D12: Fire safety
 - D13: Agent of Change

D14: Noise
 H1: Increasing housing supply
 H8: Loss of existing housing and estate redevelopment
 S1: Developing London's social infrastructure
 S2: Health and social care facilities
 S6: Public toilets
 E1: Offices
 E2: Providing suitable business space
 E3: Affordable workspace
 E9: Retail, markets and hot food takeaways
 E11: Skills and opportunities for all
 HC1: Heritage conservation and growth
 HC2: World Heritage Sites
 HC3: Strategic and local views
 HC4: London View Management Framework
 G1: Green infrastructure
 G4: Open space
 G5: Urban greening
 G6: Biodiversity and access to nature
 G7: Trees and woodlands
 S11: Improving air quality
 S12: Minimising greenhouse gas emissions
 S13: Energy infrastructure
 S14: Managing heat risk
 S15: Water infrastructure
 S16: Digital connectivity infrastructure
 S17: Reducing waste and supporting the circular economy
 S10: Aggregates
 S112: Flood risk management
 S113: Sustainable drainage
 T1: Strategic approach to transport
 T2: Healthy streets
 T3: Transport capacity, connectivity and safeguarding
 T4: Assessing and mitigating transport impacts
 T5: Cycling
 T6: Car parking (including T6.2 office parking, T6.3 retail parking and T6.5 non-residential disabled persons parking)
 T7: Deliveries, servicing and construction
 T9: Funding transport infrastructure through planning
 DF1: Delivery of the Plan and planning obligations.

Southwark Plan

3. The Southwark Plan (2022) has been adopted recently. It was approved by Cabinet on 7 December 2021 and proceeded to final adoption by Council Assembly on 23 February 2022. The Southwark Plan (2022) has replaced the saved policies of the Southwark Plan (2007), the Core Strategy (2011), the Aylesbury Area Action Plan (2010), the Peckham and Nunhead Area Action Plan (2014) and the Canada Water Area Action Plan (2015).

4. The earlier version, known as the New Southwark Plan was submitted to the Secretary of State in January 2020. The Examination in Public (EiP) for the NSP took place between February and April 2021. The Inspectors wrote a post hearings letter on 28 May 2021 and under Section 20(7)(c) of the Planning and Compulsory Purchase Act (2004) the Council asked the Inspectors to recommend Main Modifications to ensure the Plan is sound. The Council consulted on the Main Modifications as recommended by the Inspectors from 6 August 2021 to 24 September 2021. The Inspectors published their final report and the Plan proceeded to adoption.
5. The Southwark Plan (2022) includes Strategic Policies, Area Visions and Development Management Policies. The most relevant strategic policies are as follows:
 - ST1 Southwark's Development Targets
 - ST2 Southwark's Places
 - SP2 Southwark Together
 - SP3 A great start in life
 - SP4 Green and inclusive economy
 - SP5 Thriving and neighbourhoods and tackling health inequalities
 - SP6 Climate emergency.
6. The site is within the AV.09 Elephant and Castle Area Vision and is not an identified site allocation.
7. The most relevant development management policies of the Southwark Plan are as follows:
 - P13 Design of places
 - P14 Design quality
 - P16 Designing out crime
 - P17 Tall buildings
 - P18 Efficient use of land
 - P21 Conservation of the historic environment and natural heritage
 - P22 Borough views
 - P23 Archaeology
 - P24 World Heritage Sites
 - P28 Access to employment and training
 - P30 Office and business development
 - P31 Affordable workspace
 - P33 Business relocation
 - P34 Town and local centres
 - P39 Shop fronts
 - P44 Broadband and digital infrastructure
 - P45 Healthy development
 - P46 Leisure, arts and culture
 - P49 Public transport
 - P50 Highway impacts
 - P51 Walking
 - P53 Cycling
 - P54 Car parking
 - P55 Parking standards for disabled people and the physically impaired

P56 Protection of amenity
 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
 IP1 Infrastructure
 IP2 Transport infrastructure
 IP3 Community infrastructure levy (CIL) and section 106 planning obligations
 IP6 Monitoring development
 IP7 Statement of community involvement.

8. The Southwark Plan responds positively to the NPPF, by incorporating area visions, development management policies and site allocations which plan for the long term delivery of housing. It responds to rapid change which is occurring in Southwark and London as a whole and responds positively to the changing context of the London Plan.

Supplementary Planning Document and other relevant documents

9. 2015 Technical Update to the Residential Design Standards SPD (2011)
 Elephant and Castle SPD and OAPF (2012)
 Heritage SPD (2021)
 Section 106 Planning Obligations and CIL SPD (November 2020 update)
 Sustainable Design and Construction (2009)

Greater London Authority Supplementary Guidance

10. Accessible London SPG (2014)
 Affordable Housing and Viability SPG (2017)
 Be Seen Energy Monitoring LPG (2021)
 Character and Context SPG (2014)
 Circular Economy Statements LPG (2022)
 Crossrail Funding SPG (2016)
 Energy Assessment Guidance (2020)
 London View Management Framework SPG (2012 and 2016 erratum)
 Social Infrastructure SPG (2015)
 The control of dust and emissions in construction SPG (2014)
 Whole Life Carbon LPG (2022)

Emerging material considerations

Draft GLA guidance

11. To support the London Plan (2021), the GLA has drafted further London Planning Guidance (LPG) on topic areas including:
 - Air Quality Neutral draft LPG
 - Fire Safety draft LPG
 - Optimising site capacity: a design-led approach draft LPG
 - Sustainable transport, walking and cycling draft guidance
 - Urban Greening Factor draft LPG.

APPENDIX 3

Relevant planning history of the site and nearby sites

Elephant Park sites

Reference and Proposal	Status
<p>12/AP/1092 Outline application for: Redevelopment to provide a mixed use development comprising a number of buildings ranging between 13.13m (AOD) and 104.8m (AOD) in height with capacity for between 160,579sqm GEA (min) and 254,000sqm GEA (max) residential floorspace together with retail (Class A1-A5), business (Class B1), leisure and community (Class D2 and D1), energy centre (sui generis) uses. New landscaping, park and public realm, car parking, means of access and other associated works).</p>	<p>Granted with Legal Agreement 27/03/2013</p>
<p>14/AP/3438 Application for approval of reserved matters (access, scale, appearance, layout and landscaping) for Plot H2 within Elephant Park (previously referred to as the Heygate Masterplan), submitted pursuant to the Outline Planning Permission ref: 12/AP/1092. The proposals comprise the construction of a development plot ranging between 10 and 31 storeys in height (max height 104.8m AOD) comprising 365 residential units, 2,033sqm (GEA) flexible retail (A1-A5) uses, car parking, cycle storage, servicing, plant areas, landscaping, new public realm and other associated works.</p>	<p>Granted 08/12/2014</p>
<p>18/AP/3225 Non-material amendment to outline planning permission ref. 12/AP/1092 for: Redevelopment to provide a mixed use development comprising a number of buildings ranging between 13.13m (AOD) and 104.8m (AOD) in height with capacity for between 2,300 (min) and 2,469 (max) residential units together with retail (Class A1-A5), business (Class B1), leisure and community (Class D2 and D1), energy centre (sui generis) uses. New landscaping, park and public realm, car parking, means of access and other associated works) in order to:</p> <ul style="list-style-type: none"> - Amend the description of development to: "Outline application for: Redevelopment to provide a mixed use development comprising a number of buildings ranging between 13.13m (AOD) and 104.8m (AOD) in height with capacity for between 160,579sqm GEA (min) and 254,400sqm GEA (max) residential floorspace together with retail (Class A1-A5), business (Class B1), leisure and community (Class D2 and D1), energy centre (sui generis) uses. New landscaping, park and public realm, car parking, means of access other associated works." - To amend condition 2 part b to cross-refer to the approved plans and documents listed at condition 6. - To submit an amended Development Specification (October 2018) and amend condition 6 to list the Development Specification (October 2018) as the approved version. 	<p>Agreed 07/11/2018</p>

<p>19/AP/1166 Application for the approval of reserved matters (access, scale, appearance, layout and landscaping) for Plot H7 within Elephant Park (previously referred to as the Heygate Masterplan), submitted pursuant to Outline Planning Permission ref: 12/AP/1092. The proposal comprises the construction of a development ranging between 9 and 25 storeys in height (maximum building height 86.75 m AOD), comprising 424 residential units, 1,237sqm (GEA) of flexible retail (Classes A1 - A5) uses and 628 sqm (GEA) flexible retail, community and leisure (Classes A1-A5, D1-D2), car parking, cycle storage, servicing, plant areas, landscaping, public realm, and other associated works.</p>	<p>Granted 05/03/2020</p>
<p>19/AP/5787 Approval of reserved matters (access, layout, landscaping and appearance) for the Park within Elephant Park (previously referred to as the Heygate Masterplan), submitted pursuant to outline planning permission ref. 12/AP/1092 (Outline application for: Redevelopment to provide a mixed use development comprising a number of buildings ranging between 13.13m (AOD) and 104.8m (AOD) in height with capacity for between 160,579sq m (min) and 254,400sq m GEA (max) residential floorspace together with retail (Class A1 -A5), business (Class B1), leisure and community (Class D2 and D1), energy centre (sui generis) uses. New landscaping, park and public realm, car parking, means of access and other associated works.). The proposals comprise the creation of a permanent new park area comprising landscaping, planting, access, and other associated works.</p>	<p>Granted 17/07/2020</p>
<p>20/AP/1086 Application for the approval of reserved matters (access, scale, layout, appearance and landscaping) for the Pavilion within Elephant Park (previously referred to as the Heygate Masterplan), submitted pursuant to outline planning permission ref: 12/AP/1092. The proposals comprise the construction of a single storey building comprising 22 sqm (GEA) Class A1-A5 retail floorspace and 49 sqm (GEA) Class D1 community use floorspace, an accessible roof terrace, landscaping, and other associated works.</p>	<p>Granted 21/10/2020</p>
<p>20/AP/2445 Non material amendment to planning permission ref. 12/AP/1092 dated 27th March 2013 (Outline application for: Redevelopment to provide a mixed use development comprising a number of buildings ranging between 13.13m (AOD) and 104.8m (AOD) in height with capacity for between 160,579sqm GEA (min) and 254,000sqm GEA (max) residential floorspace together with retail (Class A1-A5), business (Class B1), leisure and community (Class D2 and D1), energy centre (sui generis) uses. New landscaping, park and public realm, car parking, means of access and other associated works). The amendment proposes to adjust the minimum requirement for each non-residential land use as follows: revision of the minimum floor areas within Table 4.2 of the Development Specification to reduce the minimum area of Class A retail space, increase the minimum areas of Classes B1, D1 and D2 uses, and reduce the minimum area of parking, plant, servicing and storage. These result in the same total combined minimum GEA floorspace for Class A, B1, D1 and D2 uses as approved.</p>	<p>Agreed 24/02/2021</p>

<p>20/AP/2534 Submission of a revised phasing plan pursuant to conditions 4 (Detailed Phasing Plan - Environmental Statement) and 5 (Detailed Phasing Plan Amendments) of planning permission ref. 12/AP/1092 for the Elephant Park Masterplan (Outline application for: Redevelopment to provide a mixed use development comprising a number of buildings ranging between 13.13m (AOD) and 104.8m (AOD) in height with capacity for between 160,579sqm GEA (min) and 254,000sqm GEA (max) residential floorspace together with retail (Class A1-A5), business (Class B1), leisure and community (Class D2 and D1), energy centre (sui generis) uses. New landscaping, park and public realm, car parking, means of access and other associated works). The proposed amendments to the phasing include; subdividing MP5 into MP5a and MP5b; amending the anticipated construction timescales for MP4; incorporation of the four phases of the park into the phasing plan. The application is accompanied by an Environmental Statement submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.</p>	<p>Granted 08/03/2021</p>
<p>20/AP/2612 Erection of 2 x containers to accommodate urban farming use (Sui generis) together with storage area, landscaping and other associated works for a temporary period of 1 year.</p>	<p>Granted 06/11/2020</p>
<p>21/AP/1947 Non-material amendment to reserved matters approval ref. 14/AP/3438 (Application for approval of reserved matters (access, scale, appearance, layout and landscaping) for Plot H2 within Elephant Park (previously referred to as the Heygate Masterplan), submitted pursuant to the Outline Planning Permission ref: 12/AP/1092. The proposals comprise the construction of a development plot ranging between 10 and 31 storeys in height (max height 104.8m AOD) comprising 365 residential units, 2,033sqm (GEA) flexible retail (A1-A5) uses, car parking, cycle storage, servicing, plant areas, landscaping, new public realm and other associated works) to amend the wording of condition 5 in order to allow the existing public realm landscaping to be altered.</p>	<p>Agreed 01/07/2021</p>
<p>21/AP/1798 Application for the approval of reserved matters (access, layout, landscaping and appearance only) for the Park Area within Elephant Park submitted pursuant to outline planning permission (ref: 12/AP/1092). The proposal incorporates changes to the Park Plaza area, cycle route, planting, lighting, signage and other minor amendments to the park development approved by reserved matters approval (ref: 19/AP/5787).</p>	<p>Pending consideration</p>
<p>22/AP/1424 Erection of 2 x containers to accommodate urban farming use (Sui generis) together with storage area, landscaping and other associated works for a temporary period until 31st March 2023.</p>	<p>Granted 13/7/2022</p>

Key applications for the nearby Elephant and Castle Shopping Centre

<p>16/AP/4458</p> <p>Phased, mixed-use redevelopment of the existing Elephant and Castle shopping centre and London College of Communication sites comprising the demolition of all existing buildings and structures and redevelopment to comprise buildings ranging in height from single storey to 35 storeys (with a maximum building height of 124.5m AOD) above multi-level and single basements, to provide a range of uses including 979 residential units (use class C3), retail (use Class A1-A4), office (Use Class B1), Education (use class D1), assembly and leisure (use class D2) and a new station entrance and station box for use as a London underground operational railway station; means of access, public realm and landscaping works, parking and cycle storage provision, plant and servicing areas, and a range of other associated and ancillary works and structures.</p> <p>In the Council's opinion the proposal may affect the setting of the following listed buildings and conservation areas:</p> <p>Metro Central Heights, Newington Causeway; Metropolitan Tabernacle, Newington Butts; Michael Faraday Memorial, Elephant and Castle; the Imperial War Museum, St George's Road; and the Obelisk at St George's Circus.</p> <p>Elliot's Row; St George's Circus and West Square Conservation Areas and the listed buildings therein, and the Walcot Square Conservation Area in Lambeth</p> <p>The application is accompanied by an Environmental Statement (ES) submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) 2011 (as amended).</p>	<p>Granted 10/01/2019</p>
<p>20/AP/3675</p> <p>Minor material amendment under s73 of the Town and Country Planning Act (1990 (as amended) to vary condition 1 (approved drawings) of planning permission 16/AP/4458 (Phased, mixed-use redevelopment of the existing Elephant and Castle shopping centre and London College of Communication sites comprising the demolition of all existing buildings and structures and redevelopment to comprise buildings ranging in height from single storey to 35 storeys (with a maximum building height of 124.5m AOD) above multi-level and single basements, to provide a range of uses including 979 residential units (use class C3), retail (use Class A1-A4), office (Use Class B1), Education (use class D1), assembly and leisure (use class D2) and a new station entrance and station box for use as a London underground operational railway station; means of access, public realm and landscaping works, parking and cycle storage provision, plant and servicing areas, and a range of other associated and ancillary works and structures comprising the enlargement and reconfiguration of the consented station box, including the provision of an additional basement level and minor elevational changes to the station entrance to:</p> <ul style="list-style-type: none"> - enable the new station entrance to serve as the single point of entry / exit for both Northern and Bakerloo lines in the future; - facilitate future connection with the Bakerloo line platforms from the ticket hall, through provision of space for three additional escalators; - provide simpler step free access routes between the ticket hall and the Northern line platforms; - provide an extension to the firefighters' lift shaft to the Bakerloo line connection level; and - secure revisions to retain access to an existing London Underground 	<p>Granted 12/03/2021</p>

ventilation shaft.	
<p>21/AP/1581 Variation of Schedule 2, part 7 (fit out and opening of the London Underground Station Box) of the s106 agreement pursuant to planning permission 16/AP/4458 (Phased, mixed-use redevelopment of the existing Elephant and Castle shopping centre and London College of Communication sites comprising the demolition of all existing buildings and structures and redevelopment to comprise buildings ranging in height from single storey to 35 storeys (with a maximum building height of 124.5m AOD) above multi-level and single basements, to provide a range of uses including 979 residential units (use class C3), retail (use Class A1-A4), office (Use Class B1), Education (use class D1), assembly and leisure (use class D2) and a new station entrance and station box for use as a London underground operational railway station; means of access, public realm and landscaping works, parking and cycle storage provision, plant and servicing areas, and a range of other associated and ancillary works and structures.) to remove the requirements for details of the timescales for the fit out and opening of the station box to be provided in a Development Agreement).</p>	<p>Agreed 28/05/2021</p>

Consultation undertaken

Site notice dates: 15/6/2021 and 15/12/2021

Press notice dates: 10/6/2021 and 14/12/2021

Case officer site visit date: 15/6/2021 and 15/12/2021

Neighbour consultation letters sent: 10/6/2021 and 16/12/2021

Internal services consulted

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

Statutory and non-statutory organisations

Arqiva
 Civil Aviation Authority
 Environment Agency
 Greater London Authority
 Historic England
 Lambeth Council
 London Fire & Emergency Planning Authority
 London Underground
 National Air Traffic Safeguarding Office
 National Grid
 National Planning Casework Unit
 Natural England
 Network Rail
 Metropolitan Police Service (Designing Out Crime)
 Transport for London
 Thames Water
 UKPN
 Walworth Society
 Westminster Council

Neighbour and local groups consulted:

1712 Portchester House 50 New Kent
 Road London
 1516 Portchester House 50 New Kent
 Road London

1513 Portchester House 50 New Kent
 Road London
 Apartment 2501 Tantallon House 130
 Elephant Road

1406 Mawes House 5 Castle Square
 London
 Apartment 1901 Tantallon House 130
 Elephant Road
 Apartment 1704 Tantallon House 130
 Elephant Road
 1007 Mawes House 5 Castle Square
 London
 901 Mawes House 5 Castle Square
 London
 807 Mawes House 5 Castle Square
 London
 506 Mawes House 5 Castle Square
 London
 Apartment 903 Tantallon House 130
 Elephant Road
 Apartment 703 Tantallon House 130
 Elephant Road
 Apartment 2104 Raglan House 120
 Elephant Road
 Apartment 1805 Raglan House 120
 Elephant Road
 Unit 8 4 Spare Street London
 1206 Portchester House 50 New Kent
 Road London
 1111 Portchester House 50 New Kent
 Road London
 404 Portchester House 50 New Kent
 Road London
 812 Portchester House 50 New Kent
 Road London
 715 Portchester House 50 New Kent
 Road London
 1314 Portchester House 50 New Kent
 Road London
 Apartment 801 8 Walworth Road London
 Apartment 2906 8 Walworth Road
 London
 Apartment 2904 8 Walworth Road
 London
 Apartment 2608 8 Walworth Road
 London
 Apartment 2504 8 Walworth Road
 London
 102 Julian Markham House 114
 Walworth Road London
 Apartment 206 8 Walworth Road London
 Apartment 2304 8 Walworth Road
 London
 Apartment 2206 8 Walworth Road
 London
 30 Wollaston Close Hampton Street
 London
 Apartment 2001 8 Walworth Road
 London
 Apartment 3308 8 Walworth Road
 London
 Apartment 3202 8 Walworth Road
 London
 Apartment 1410 8 Walworth Road
 London
 First Floor Flat 84 Walworth Road
 London
 Studio 2 86 Walworth Road London
 Flat 14 88 Walworth Road London
 Flat 11 88 Walworth Road London
 Flat 1 88 Walworth Road London
 7 Hampton House Hampton Street
 London
 82 Walworth Road London Southwark
 86 Walworth Road London Southwark
 Apartment 2503 Tantallon House 130
 Elephant Road
 Apartment 2105 Tantallon House 130
 Elephant Road
 Apartment 1804 Tantallon House 130
 Elephant Road
 Apartment 803 Tantallon House 130
 Elephant Road
 Apartment 605 Tantallon House 130
 Elephant Road
 403 Mawes House 5 Castle Square
 London
 307 Mawes House 5 Castle Square
 London
 201 Mawes House 5 Castle Square
 London
 7 Ash Avenue London Southwark
 1 Ash Avenue London Southwark
 1909 Portchester House 50 New Kent
 Road London
 1814 Portchester House 50 New Kent
 Road London
 1614 Portchester House 50 New Kent
 Road London
 1507 Portchester House 50 New Kent
 Road London
 1410 Portchester House 50 New Kent
 Road London
 1313 Portchester House 50 New Kent
 Road London
 1303 Portchester House 50 New Kent
 Road London
 Apartment 1501 Raglan House 120

Elephant Road	Apartment 3304 8 Walworth Road
Apartment 1306 Raglan House 120	London
Elephant Road	Apartment 2805 8 Walworth Road
Apartment 1205 Raglan House 120	London
Elephant Road	Apartment 1911 8 Walworth Road
Apartment 904 Raglan House 120	London
Elephant Road	Apartment 1810 8 Walworth Road
Apartment 804 Raglan House 120	London
Elephant Road	Apartment 1805 8 Walworth Road
Apartment 803 Raglan House 120	London
Elephant Road	Apartment 1711 8 Walworth Road
Apartment 801 Raglan House 120	London
Elephant Road	Apartment 1708 8 Walworth Road
Apartment 604 Raglan House 120	London
Elephant Road	Apartment 2609 8 Walworth Road
Apartment 601 Raglan House 120	London
Elephant Road	Apartment 2508 8 Walworth Road
Apartment 504 Raglan House 120	London
Elephant Road	Apartment 2506 8 Walworth Road
1207 Portchester House 50 New Kent	London
Road London	Apartment 1310 8 Walworth Road
811 Portchester House 50 New Kent	London
Road London	Apartment 1302 8 Walworth Road
803 Portchester House 50 New Kent	London
Road London	Apartment 1105 8 Walworth Road
609 Portchester House 50 New Kent	London
Road London	Apartment 3603 8 Walworth Road
515 Portchester House 50 New Kent	London
Road London	Apartment 902 8 Walworth Road London
512 Portchester House 50 New Kent	Apartment 709 8 Walworth Road London
Road London	Apartment 303 8 Walworth Road London
511 Portchester House 50 New Kent	Apartment 210 8 Walworth Road London
Road London	407 Julian Markham House 114
502 Portchester House 50 New Kent	Walworth Road London
Road London	305 Julian Markham House 114
405 Portchester House 50 New Kent	Walworth Road London
Road London	203 Julian Markham House 114
312 Portchester House 50 New Kent	Walworth Road London
Road London	105 Julian Markham House 114
Apartment 2503 Raglan House 120	Walworth Road London
Elephant Road	103 Julian Markham House 114
Apartment 2501 Raglan House 120	Walworth Road London
Elephant Road	Railway Arch 2 Elephant Mews Elephant
Apartment 2305 Raglan House 120	Road
Elephant Road	Railway Arch 1 Elephant Mews Elephant
Apartment 1806 Raglan House 120	Road
Elephant Road	13 Wollaston Close Hampton Street
2 Spare Street London Southwark	London
Railway Arch 113C Elephant Road	Apartment 803 Maurice House 4 Ash
London	Avenue
Apartment 3306 8 Walworth Road	Apartment 701 Maurice House 4 Ash
London	Avenue

Apartment 605 Maurice House 4 Ash Avenue
 Apartment 502 Maurice House 4 Ash Avenue
 Apartment 404 Maurice House 4 Ash Avenue
 Apartment 308 Maurice House 4 Ash Avenue
 Apartment 303 Maurice House 4 Ash Avenue
 Apartment 905 Vowler House 10 Ash Avenue
 Apartment 903 Vowler House 10 Ash Avenue
 Apartment 902 Vowler House 10 Ash Avenue
 Apartment 601 Vowler House 10 Ash Avenue
 Apartment 401 Vowler House 10 Ash Avenue
 Apartment 201 Vowler House 10 Ash Avenue
 Apartment 104 Vowler House 10 Ash Avenue
 Apartment 2308 New Cooper Point 52 New Kent Road
 Apartment 2206 New Cooper Point 52 New Kent Road
 Apartment 2103 New Cooper Point 52 New Kent Road
 Apartment 2006 New Cooper Point 52 New Kent Road
 Apartment 2001 New Cooper Point 52 New Kent Road
 Apartment 1606 New Cooper Point 52 New Kent Road
 Apartment 1503 New Cooper Point 52 New Kent Road
 Apartment 1407 New Cooper Point 52 New Kent Road
 Apartment 1403 New Cooper Point 52 New Kent Road
 Apartment 1401 New Cooper Point 52 New Kent Road
 Apartment 1305 New Cooper Point 52 New Kent Road
 Apartment 1304 New Cooper Point 52 New Kent Road
 Apartment 1103 New Cooper Point 52 New Kent Road
 Apartment 1005 New Cooper Point 52 New Kent Road
 Apartment 1004 New Cooper Point 52 New Kent Road
 Apartment 503 New Cooper Point 52 New Kent Road
 Apartment 403 New Cooper Point 52 New Kent Road
 Apartment 1101 Maurice House 4 Ash Avenue
 Apartment 903 Maurice House 4 Ash Avenue
 Apartment 801 Maurice House 4 Ash Avenue
 Apartment 708 Maurice House 4 Ash Avenue
 Apartment 407 Maurice House 4 Ash Avenue
 Apartment 204 Maurice House 4 Ash Avenue
 Apartment 603 Vowler House 10 Ash Avenue
 Apartment 404 Vowler House 10 Ash Avenue
 Apartment 304 Vowler House 10 Ash Avenue
 Apartment 205 Vowler House 10 Ash Avenue
 Apartment 2407 New Cooper Point 52 New Kent Road
 Apartment 2406 New Cooper Point 52 New Kent Road
 Apartment 2402 New Cooper Point 52 New Kent Road
 Apartment 2301 New Cooper Point 52 New Kent Road
 Apartment 2207 New Cooper Point 52 New Kent Road
 Apartment 2205 New Cooper Point 52 New Kent Road
 Apartment 2201 New Cooper Point 52 New Kent Road
 Apartment 2102 New Cooper Point 52 New Kent Road
 Apartment 2008 New Cooper Point 52 New Kent Road
 Apartment 304 Tantallon House 130 Elephant Road
 Apartment 703 Vowler House 10 Ash Avenue
 133 Walworth Road London Southwark
 Unit 4 4 Spare Street London
 Unit 1 4 Spare Street London
 Unit 9 3 Spare Street London

Flat 702 Highline Building 10 Steedman Street	1104 Portchester House 50 New Kent Road London
Flat 504 Highline Building 10 Steedman Street	1013 Portchester House 50 New Kent Road London
Flat 107 Highline Building 10 Steedman Street	1002 Portchester House 50 New Kent Road London
1702 Mawes House 5 Castle Square London	816 Portchester House 50 New Kent Road London
1604 Mawes House 5 Castle Square London	810 Portchester House 50 New Kent Road London
1502 Mawes House 5 Castle Square London	801 Portchester House 50 New Kent Road London
1501 Mawes House 5 Castle Square London	709 Portchester House 50 New Kent Road London
1405 Mawes House 5 Castle Square London	706 Portchester House 50 New Kent Road London
805 Mawes House 5 Castle Square London	704 Portchester House 50 New Kent Road London
708 Mawes House 5 Castle Square London	309 Portchester House 50 New Kent Road London
702 Mawes House 5 Castle Square London	301 Portchester House 50 New Kent Road London
505 Mawes House 5 Castle Square London	Apartment 2205 Raglan House 120 Elephant Road
40 New Kent Road London Southwark	Apartment 1801 Raglan House 120 Elephant Road
8 Castle Square London Southwark	Apartment 1702 Raglan House 120 Elephant Road
2004 Portchester House 50 New Kent Road London	Studio 15 86 Walworth Road London
1914 Portchester House 50 New Kent Road London	Apartment 3309 8 Walworth Road London
1711 Portchester House 50 New Kent Road London	Apartment 2501 8 Walworth Road London
1703 Portchester House 50 New Kent Road London	Apartment 2405 8 Walworth Road London
1609 Portchester House 50 New Kent Road London	Apartment 2402 8 Walworth Road London
1604 Portchester House 50 New Kent Road London	Apartment 2310 8 Walworth Road London
1505 Portchester House 50 New Kent Road London	Apartment 1406 8 Walworth Road London
1216 Portchester House 50 New Kent Road London	Apartment 203 New Cooper Point 52 New Kent Road
1213 Portchester House 50 New Kent Road London	12 Ash Avenue London Southwark
Apartment 1401 Raglan House 120 Elephant Road	Unit 16 40 Elephant Road London
Apartment 1004 Raglan House 120 Elephant Road	Unit 14 40 Elephant Road London
Apartment 901 Raglan House 120 Elephant Road	Arch 145 Eagle Yard Hampton Street
1112 Portchester House 50 New Kent Road London	Arch 141 Eagle Yard Hampton Street
	Apartment 1903 Hurlock Heights 4 Deacon Street
	Concierge Office Hurlock Heights 4 Deacon Street

Apartment 2902 Hurlock Heights 4
Deacon Street
Apartment 2806 Hurlock Heights 4
Deacon Street
Apartment 2805 Hurlock Heights 4
Deacon Street
Apartment 2705 Hurlock Heights 4
Deacon Street
Apartment 2407 Hurlock Heights 4
Deacon Street
Apartment 2306 Hurlock Heights 4
Deacon Street
Apartment 2206 Hurlock Heights 4
Deacon Street
Apartment 2106 Hurlock Heights 4
Deacon Street
Apartment 1907 Hurlock Heights 4
Deacon Street
Apartment 1901 Hurlock Heights 4
Deacon Street
Apartment 1807 Hurlock Heights 4
Deacon Street
Apartment 1805 Hurlock Heights 4
Deacon Street
Apartment 1704 Hurlock Heights 4
Deacon Street
Apartment 1701 Hurlock Heights 4
Deacon Street
Apartment 1603 Hurlock Heights 4
Deacon Street
Apartment 1508 Hurlock Heights 4
Deacon Street
Apartment 1504 Hurlock Heights 4
Deacon Street
Apartment 1406 Hurlock Heights 4
Deacon Street
Apartment 1403 Hurlock Heights 4
Deacon Street
Apartment 1107 Hurlock Heights 4
Deacon Street
Apartment 1104 Hurlock Heights 4
Deacon Street
Apartment 1102 Hurlock Heights 4
Deacon Street
Apartment 1004 Hurlock Heights 4
Deacon Street
Apartment 906 Hurlock Heights 4
Deacon Street
Apartment 804 Hurlock Heights 4
Deacon Street
Apartment 701 Hurlock Heights 4
Deacon Street

Apartment 606 Hurlock Heights 4
Deacon Street
Apartment 603 Hurlock Heights 4
Deacon Street
Apartment 505 Hurlock Heights 4
Deacon Street
Apartment 501 Hurlock Heights 4
Deacon Street
Apartment 305 Hurlock Heights 4
Deacon Street
Apartment 208 Hurlock Heights 4
Deacon Street
Apartment 203 Hurlock Heights 4
Deacon Street
Apartment 102 Hurlock Heights 4
Deacon Street
Second Floor Flat 4 Hampton Street
London
402 Mawes House 5 Castle Square
London
Apartment 2605 8 Walworth Road
London
304 Julian Markham House 114
Walworth Road London
Apartment 2209 8 Walworth Road
London
Apartment 1908 New Cooper Point 52
New Kent Road
Apartment 1906 New Cooper Point 52
New Kent Road
Apartment 1905 New Cooper Point 52
New Kent Road
Apartment 1807 New Cooper Point 52
New Kent Road
Apartment 1705 New Cooper Point 52
New Kent Road
Apartment 1601 New Cooper Point 52
New Kent Road
Apartment 1408 New Cooper Point 52
New Kent Road
Apartment 1406 New Cooper Point 52
New Kent Road
Apartment 1402 New Cooper Point 52
New Kent Road
Apartment 1308 New Cooper Point 52
New Kent Road
Apartment 1107 New Cooper Point 52
New Kent Road
Apartment 1106 New Cooper Point 52
New Kent Road
Apartment 905 New Cooper Point 52
New Kent Road

Apartment 703 New Cooper Point 52 New Kent Road	Apartment 409 8 Walworth Road London
Apartment 701 New Cooper Point 52 New Kent Road	Apartment 202 2 Walworth Road London
Apartment 305 New Cooper Point 52 New Kent Road	Railway Arch 6 Elephant Mews Elephant Road
Apartment 303 New Cooper Point 52 New Kent Road	24 Wollaston Close Hampton Street London
Apartment 3108 8 Walworth Road London	12 Wollaston Close Hampton Street London
Apartment 3103 8 Walworth Road London	8 Wollaston Close Hampton Street London
Apartment 3002 8 Walworth Road London	Apartment 1104 Maurice House 4 Ash Avenue
Apartment 2911 8 Walworth Road London	Apartment 904 Maurice House 4 Ash Avenue
Apartment 2002 8 Walworth Road London	Apartment 504 Maurice House 4 Ash Avenue
Apartment 1710 8 Walworth Road London	Apartment 406 Maurice House 4 Ash Avenue
Apartment 1707 8 Walworth Road London	Apartment 402 Maurice House 4 Ash Avenue
Apartment 2411 8 Walworth Road London	Apartment 207 Maurice House 4 Ash Avenue
Apartment 2302 8 Walworth Road London	Apartment 206 Maurice House 4 Ash Avenue
Apartment 2211 8 Walworth Road London	Apartment 201 Maurice House 4 Ash Avenue
Apartment 1408 8 Walworth Road London	Apartment 904 Vowler House 10 Ash Avenue
Apartment 1211 8 Walworth Road London	Apartment 801 Vowler House 10 Ash Avenue
Apartment 1201 8 Walworth Road London	Apartment 606 Vowler House 10 Ash Avenue
Apartment 1110 8 Walworth Road London	Apartment 501 Vowler House 10 Ash Avenue
Apartment 1107 8 Walworth Road London	Apartment 402 Vowler House 10 Ash Avenue
Apartment 1009 8 Walworth Road London	Apartment 303 Vowler House 10 Ash Avenue
Apartment 1005 8 Walworth Road London	Apartment 106 Vowler House 10 Ash Avenue
Apartment 3802 8 Walworth Road London	Apartment 2106 New Cooper Point 52 New Kent Road
Apartment 3601 8 Walworth Road London	Apartment 2104 New Cooper Point 52 New Kent Road
Apartment 3501 8 Walworth Road London	Apartment 2005 New Cooper Point 52 New Kent Road
Apartment 802 8 Walworth Road London	Apartment 2004 New Cooper Point 52 New Kent Road
Apartment 701 8 Walworth Road London	Apartment 1307 8 Walworth Road London
Apartment 605 8 Walworth Road London	Apartment 1207 8 Walworth Road London
Apartment 509 8 Walworth Road London	

Apartment 1102 8 Walworth Road
 London
 Apartment 4004 8 Walworth Road
 London
 Apartment 4003 8 Walworth Road
 London
 Apartment 3808 8 Walworth Road
 London
 Apartment 3609 8 Walworth Road
 London
 Apartment 907 8 Walworth Road London
 Apartment 608 8 Walworth Road London
 Apartment 507 8 Walworth Road London
 Apartment 506 8 Walworth Road London
 Apartment 304 8 Walworth Road London
 Apartment 203 2 Walworth Road London
 402 Julian Markham House 114
 Walworth Road London
 303 Julian Markham House 114
 Walworth Road London
 704 Julian Markham House 114
 Walworth Road London
 607 Julian Markham House 114
 Walworth Road London
 604 Julian Markham House 114
 Walworth Road London
 Railway Arch 143 Eagle Yard 88
 Walworth Road
 16 Wollaston Close Hampton Street
 London
 Apartment 1103 Maurice House 4 Ash
 Avenue
 Apartment 809 Maurice House 4 Ash
 Avenue
 Apartment 608 Maurice House 4 Ash
 Avenue
 Apartment 607 Maurice House 4 Ash
 Avenue
 Apartment 602 Maurice House 4 Ash
 Avenue
 Apartment 508 Maurice House 4 Ash
 Avenue
 Apartment 505 Maurice House 4 Ash
 Avenue
 Apartment 503 Maurice House 4 Ash
 Avenue
 Apartment 401 Maurice House 4 Ash
 Avenue
 Apartment 306 Maurice House 4 Ash
 Avenue
 Apartment 605 Vowler House 10 Ash
 Avenue
 Apartment 306 Vowler House 10 Ash
 Avenue
 Apartment 305 Vowler House 10 Ash
 Avenue
 Apartment 607 8 Walworth Road London
 707 Julian Markham House 114
 Walworth Road London
 401 Mawes House 5 Castle Square
 London
 916 Portchester House 50 New Kent
 Road London
 703 Portchester House 50 New Kent
 Road London
 Unit 7 4 Spare Street London
 Apartment 1909 8 Walworth Road
 London
 Apartment 2703 8 Walworth Road
 London
 Apartment 2509 8 Walworth Road
 London
 Studio 1 86 Walworth Road London
 Apartment 3507 8 Walworth Road
 London
 Unit 8 Farrell Court Elephant Road
 Unit 3 Farrell Court Elephant Road
 Apartment 704 Vowler House 10 Ash
 Avenue
 Flat 103 Highline Building 10 Steedman
 Street
 Apartment 1204 Raglan House 120
 Elephant Road
 1903 Portchester House 50 New Kent
 Road London
 1811 Portchester House 50 New Kent
 Road London
 1805 Portchester House 50 New Kent
 Road London
 1803 Portchester House 50 New Kent
 Road London
 1602 Mawes House 5 Castle Square
 London
 1205 Mawes House 5 Castle Square
 London
 Apartment 1506 Tantallon House 130
 Elephant Road
 Apartment 1504 Tantallon House 130
 Elephant Road
 1002 Mawes House 5 Castle Square
 London
 Apartment 1401 Tantallon House 130
 Elephant Road
 Apartment 1103 Tantallon House 130

Elephant Road
 Apartment 2010 8 Walworth Road
 London
 Apartment 1702 Tantallon House 130
 Elephant Road
 Unit 2 3 Spare Street London
 Apartment 2406 8 Walworth Road
 London
 Apartment 2210 8 Walworth Road
 London
 Apartment 1403 8 Walworth Road
 London
 Apartment 201 8 Walworth Road London
 1601 Portchester House 50 New Kent
 Road London
 1307 Portchester House 50 New Kent
 Road London
 1115 Portchester House 50 New Kent
 Road London
 506 Portchester House 50 New Kent
 Road London
 Apartment 3403 8 Walworth Road
 London
 Apartment 2810 8 Walworth Road
 London
 Flat 403 Highline Building 10 Steedman
 Street
 Apartment 1402 Raglan House 120
 Elephant Road
 Apartment 301 Raglan House 120
 Elephant Road
 508 Mawes House 5 Castle Square
 London
 305 Mawes House 5 Castle Square
 London
 Apartment 905 Tantallon House 130
 Elephant Road
 Apartment 2002 New Cooper Point 52
 New Kent Road
 Apartment 1902 New Cooper Point 52
 New Kent Road
 Apartment 1801 New Cooper Point 52
 New Kent Road
 Apartment 1707 New Cooper Point 52
 New Kent Road
 Apartment 1704 New Cooper Point 52
 New Kent Road
 Apartment 1608 New Cooper Point 52
 New Kent Road
 Apartment 1602 New Cooper Point 52
 New Kent Road
 Apartment 1507 New Cooper Point 52
 New Kent Road
 Apartment 1501 New Cooper Point 52
 New Kent Road
 Apartment 1307 New Cooper Point 52
 New Kent Road
 Apartment 1203 New Cooper Point 52
 New Kent Road
 Apartment 1101 New Cooper Point 52
 New Kent Road
 Apartment 1008 New Cooper Point 52
 New Kent Road
 Apartment 1006 New Cooper Point 52
 New Kent Road
 Apartment 908 New Cooper Point 52
 New Kent Road
 Apartment 907 New Cooper Point 52
 New Kent Road
 Apartment 804 New Cooper Point 52
 New Kent Road
 Apartment 604 New Cooper Point 52
 New Kent Road
 Apartment 603 New Cooper Point 52
 New Kent Road
 Apartment 602 New Cooper Point 52
 New Kent Road
 Apartment 601 New Cooper Point 52
 New Kent Road
 Apartment 502 New Cooper Point 52
 New Kent Road
 Apartment 201 New Cooper Point 52
 New Kent Road
 Unit 22 40 Elephant Road London
 Unit 18 40 Elephant Road London
 Unit 8 40 Elephant Road London
 Arch 143 Eagle Yard Hampton Street
 Apartment 3004 Hurlock Heights 4
 Deacon Street
 Apartment 2801 Hurlock Heights 4
 Deacon Street
 Apartment 2706 Hurlock Heights 4
 Deacon Street
 Apartment 2702 Hurlock Heights 4
 Deacon Street
 Apartment 2603 Hurlock Heights 4
 Deacon Street
 Apartment 2601 Hurlock Heights 4
 Deacon Street
 Apartment 2504 Hurlock Heights 4
 Deacon Street
 Apartment 2402 Hurlock Heights 4
 Deacon Street
 Apartment 2101 Hurlock Heights 4

Deacon Street
 Apartment 2008 Hurlock Heights 4
 Deacon Street
 Apartment 1902 Hurlock Heights 4
 Deacon Street
 Apartment 1801 Hurlock Heights 4
 Deacon Street
 Apartment 1702 Hurlock Heights 4
 Deacon Street
 Apartment 1606 Hurlock Heights 4
 Deacon Street
 Apartment 1604 Hurlock Heights 4
 Deacon Street
 Apartment 1601 Hurlock Heights 4
 Deacon Street
 Apartment 1506 Hurlock Heights 4
 Deacon Street
 Apartment 1503 Hurlock Heights 4
 Deacon Street
 Apartment 1301 Hurlock Heights 4
 Deacon Street
 Apartment 801 Tantallon House 130
 Elephant Road
 302 Mawes House 5 Castle Square
 London
 Apartment 604 Tantallon House 130
 Elephant Road
 2001 Portchester House 50 New Kent
 Road London
 Apartment 2005 Raglan House 120
 Elephant Road
 Apartment 1902 Raglan House 120
 Elephant Road
 Apartment 1706 Raglan House 120
 Elephant Road
 Unit 7 3 Spare Street London
 1301 Portchester House 50 New Kent
 Road London
 1215 Portchester House 50 New Kent
 Road London
 1001 Portchester House 50 New Kent
 Road London
 406 Portchester House 50 New Kent
 Road London
 802 Portchester House 50 New Kent
 Road London
 613 Portchester House 50 New Kent
 Road London
 1312 Portchester House 50 New Kent
 Road London
 1306 Portchester House 50 New Kent
 Road London
 4 Walworth Road London Southwark
 Apartment 1401 8 Walworth Road
 London
 Apartment 1306 8 Walworth Road
 London
 Apartment 1010 8 Walworth Road
 London
 Apartment 703 8 Walworth Road London
 Apartment 2901 8 Walworth Road
 London
 Apartment 508 8 Walworth Road London
 Apartment 2301 8 Walworth Road
 London
 Apartment 2203 8 Walworth Road
 London
 Apartment 3803 8 Walworth Road
 London
 Apartment 3801 8 Walworth Road
 London
 Apartment 3707 8 Walworth Road
 London
 206 Julian Markham House 114
 Walworth Road London
 107 Julian Markham House 114
 Walworth Road London
 403 Julian Markham House 114
 Walworth Road London
 Apartment 2004 8 Walworth Road
 London
 Apartment 1910 8 Walworth Road
 London
 Apartment 1703 8 Walworth Road
 London
 Apartment 1608 8 Walworth Road
 London
 502 Julian Markham House 114
 Walworth Road London
 Second Floor Flat 6 Hampton Street
 London
 Railway Arch 145 Eagle Yard 88
 Walworth Road
 Flat 2 88 Walworth Road London
 Unit 2 Farrell Court Elephant Road
 1706 Mawes House 5 Castle Square
 London
 Apartment 2302 Tantallon House 130
 Elephant Road
 Apartment 2004 Tantallon House 130
 Elephant Road
 Apartment 1806 Tantallon House 130
 Elephant Road
 Apartment 1102 Tantallon House 130

Elephant Road
 Apartment 902 Tantallon House 130
 Elephant Road
 Apartment 805 Tantallon House 130
 Elephant Road
 Apartment 802 Tantallon House 130
 Elephant Road
 Apartment 1208 Hurlock Heights 4
 Deacon Street
 Apartment 1108 Hurlock Heights 4
 Deacon Street
 Apartment 1105 Hurlock Heights 4
 Deacon Street
 Apartment 1006 Hurlock Heights 4
 Deacon Street
 Apartment 707 Hurlock Heights 4
 Deacon Street
 Apartment 204 Hurlock Heights 4
 Deacon Street
 Apartment 408 Hurlock Heights 4
 Deacon Street
 Apartment 303 Hurlock Heights 4
 Deacon Street
 Apartment 202 Hurlock Heights 4
 Deacon Street
 803 Mawes House 5 Castle Square
 London
 414 Portchester House 50 New Kent
 Road London
 Apartment 1203 8 Walworth Road
 London
 Apartment 1001 Raglan House 120
 Elephant Road
 Apartment 3604 8 Walworth Road
 London
 504 Julian Markham House 114
 Walworth Road London
 Apartment 2102 Tantallon House 130
 Elephant Road
 Apartment 1403 Tantallon House 130
 Elephant Road
 Unit 9 4 Spare Street London
 Apartment 2801 8 Walworth Road
 London
 Apartment 1601 8 Walworth Road
 London
 406 Mawes House 5 Castle Square
 London
 Unit 6 38 New Kent Road London
 1412 Portchester House 50 New Kent
 Road London
 Apartment 3204 8 Walworth Road
 London
 6 Steedman Street London Southwark
 29 Wollaston Close Hampton Street
 London
 Apartment 805 Raglan House 120
 Elephant Road
 Apartment 1505 Raglan House 120
 Elephant Road
 Unit 3 2 Spare Street London
 Apartment 804 8 Walworth Road London
 Apartment 1603 8 Walworth Road
 London
 Unit 3 3 Spare Street London
 Apartment 2808 8 Walworth Road
 London
 Apartment 2103 8 Walworth Road
 London
 Apartment 2403 8 Walworth Road
 London
 Apartment 1202 8 Walworth Road
 London
 Apartment 403 8 Walworth Road London
 602 Julian Markham House 114
 Walworth Road London
 6 Hampton House Hampton Street
 London
 Flat 503 Highline Building 10 Steedman
 Street
 Apartment 1404 Raglan House 120
 Elephant Road
 Apartment 1201 Raglan House 120
 Elephant Road
 Apartment 1102 Raglan House 120
 Elephant Road
 Apartment 705 Raglan House 120
 Elephant Road
 1508 Portchester House 50 New Kent
 Road London
 1414 Portchester House 50 New Kent
 Road London
 1701 Mawes House 5 Castle Square
 London
 1503 Mawes House 5 Castle Square
 London
 Apartment 502 Tantallon House 130
 Elephant Road
 Studio 1 Highline Building 10 Steedman
 Street
 Flat 604 Highline Building 10 Steedman
 Street
 Flat 502 Highline Building 10 Steedman
 Street

1704 Mawes House 5 Castle Square
 London
 1306 Mawes House 5 Castle Square
 London
 1107 Mawes House 5 Castle Square
 London
 1008 Mawes House 5 Castle Square
 London
 705 Mawes House 5 Castle Square
 London
 607 Mawes House 5 Castle Square
 London
 605 Mawes House 5 Castle Square
 London
 502 Mawes House 5 Castle Square
 London
 404 Mawes House 5 Castle Square
 London
 9 Ash Avenue London Southwark
 2005 Portchester House 50 New Kent
 Road London
 1906 Portchester House 50 New Kent
 Road London
 1904 Portchester House 50 New Kent
 Road London
 1902 Portchester House 50 New Kent
 Road London
 1815 Portchester House 50 New Kent
 Road London
 1812 Portchester House 50 New Kent
 Road London
 1702 Portchester House 50 New Kent
 Road London
 1611 Portchester House 50 New Kent
 Road London
 1602 Portchester House 50 New Kent
 Road London
 1509 Portchester House 50 New Kent
 Road London
 1501 Portchester House 50 New Kent
 Road London
 1415 Portchester House 50 New Kent
 Road London
 1402 Portchester House 50 New Kent
 Road London
 1311 Portchester House 50 New Kent
 Road London
 Apartment 1405 Raglan House 120
 Elephant Road
 Apartment 1403 Raglan House 120
 Elephant Road
 Apartment 1203 Raglan House 120
 Elephant Road
 Apartment 1103 Raglan House 120
 Elephant Road
 Apartment 1101 Raglan House 120
 Elephant Road
 Apartment 906 Raglan House 120
 Elephant Road
 1210 Portchester House 50 New Kent
 Road London
 1202 Portchester House 50 New Kent
 Road London
 1108 Portchester House 50 New Kent
 Road London
 904 Portchester House 50 New Kent
 Road London
 902 Portchester House 50 New Kent
 Road London
 808 Portchester House 50 New Kent
 Road London
 714 Portchester House 50 New Kent
 Road London
 514 Portchester House 50 New Kent
 Road London
 507 Portchester House 50 New Kent
 Road London
 415 Portchester House 50 New Kent
 Road London
 Apartment 1802 Raglan House 120
 Elephant Road
 Apartment 1605 Raglan House 120
 Elephant Road
 Apartment 1506 Raglan House 120
 Elephant Road
 1 Spare Street London Southwark
 Apartment 2301 Tantallon House 130
 Elephant Road
 1108 Mawes House 5 Castle Square
 London
 1105 Mawes House 5 Castle Square
 London
 Apartment 1305 Tantallon House 130
 Elephant Road
 Apartment 1006 Tantallon House 130
 Elephant Road
 202 Mawes House 5 Castle Square
 London
 Apartment 401 Tantallon House 130
 Elephant Road
 9 Castle Square London Southwark
 5 Ash Avenue London Southwark
 2003 Portchester House 50 New Kent
 Road London

1912 Portchester House 50 New Kent
 Road London
 Apartment 2206 Raglan House 120
 Elephant Road
 Apartment 2203 Raglan House 120
 Elephant Road
 Apartment 1604 Raglan House 120
 Elephant Road
 3 Spare Street London Southwark
 1004 Portchester House 50 New Kent
 Road London
 305 Portchester House 50 New Kent
 Road London
 903 Portchester House 50 New Kent
 Road London
 94-96 Walworth Road London
 Southwark
 Apartment 1111 8 Walworth Road
 London
 Apartment 3107 8 Walworth Road
 London
 Apartment 807 8 Walworth Road London
 Apartment 706 8 Walworth Road London
 Apartment 2705 8 Walworth Road
 London
 Apartment 4203 8 Walworth Road
 London
 Apartment 410 8 Walworth Road London
 Apartment 401 8 Walworth Road London
 Apartment 308 8 Walworth Road London
 Apartment 301 8 Walworth Road London
 Apartment 3607 8 Walworth Road
 London
 Apartment 3508 8 Walworth Road
 London
 405 Julian Markham House 114
 Walworth Road London
 Apartment 1806 8 Walworth Road
 London
 Apartment 1510 8 Walworth Road
 London
 Apartment 3305 8 Walworth Road
 London
 Apartment 1407 8 Walworth Road
 London
 Apartment 1404 8 Walworth Road
 London
 507 Julian Markham House 114
 Walworth Road London
 Studio 4 86 Walworth Road London
 Parking Bays 2 6 Steedman Street
 London

Unit 1 Farrell Court Elephant Road
 84 Walworth Road London Southwark
 Apartment 2204 Tantallon House 130
 Elephant Road
 Apartment 2006 Tantallon House 130
 Elephant Road
 Apartment 2001 Tantallon House 130
 Elephant Road
 Apartment 1903 Tantallon House 130
 Elephant Road
 Apartment 1002 Tantallon House 130
 Elephant Road
 Apartment 901 Tantallon House 130
 Elephant Road
 Apartment 706 Tantallon House 130
 Elephant Road
 Site Office Elephant Road London
 Studio 11 86 Walworth Road London
 Studio 3 86 Walworth Road London
 Apartment 3206 8 Walworth Road
 London
 Apartment 3009 8 Walworth Road
 London
 Apartment 2907 8 Walworth Road
 London
 Apartment 2903 8 Walworth Road
 London
 Apartment 2008 8 Walworth Road
 London
 Apartment 1906 8 Walworth Road
 London
 Apartment 1602 8 Walworth Road
 London
 Apartment 2610 8 Walworth Road
 London
 Apartment 2607 8 Walworth Road
 London
 Apartment 2503 8 Walworth Road
 London
 Apartment 2205 8 Walworth Road
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 Apartment 1505 8 Walworth Road
 London
 Apartment 1411 8 Walworth Road
 London
 Apartment 1210 8 Walworth Road
 London
 Apartment 1002 8 Walworth Road
 London
 Apartment 910 8 Walworth Road London
 Apartment 3708 8 Walworth Road
 London

Apartment 3504 8 Walworth Road
 London
 Apartment 3503 8 Walworth Road
 London
 Apartment 3409 8 Walworth Road
 London
 Apartment 809 8 Walworth Road London
 Apartment 808 8 Walworth Road London
 Apartment 806 8 Walworth Road London
 Apartment 504 8 Walworth Road London
 Apartment 502 8 Walworth Road London
 Apartment 205 8 Walworth Road London
 Apartment 302 2 Walworth Road London
 Studio 16 86 Walworth Road London
 406 Julian Markham House 114
 Walworth Road London
 207 Julian Markham House 114
 Walworth Road London
 15 Wollaston Close Hampton Street
 London
 Apartment 602 Tantallon House 130
 Elephant Road
 Apartment 501 Tantallon House 130
 Elephant Road
 Apartment 405 Tantallon House 130
 Elephant Road
 139 Walworth Road London Southwark
 Unit 6 4 Spare Street London
 Flat 104 Highline Building 10 Steedman
 Street
 Arch 151 10 Steedman Street London
 1207 Mawes House 5 Castle Square
 London
 902 Mawes House 5 Castle Square
 London
 501 Mawes House 5 Castle Square
 London
 203 Mawes House 5 Castle Square
 London
 Unit 2 38 New Kent Road London
 1905 Portchester House 50 New Kent
 Road London
 1809 Portchester House 50 New Kent
 Road London
 1708 Portchester House 50 New Kent
 Road London
 1612 Portchester House 50 New Kent
 Road London
 Apartment 1104 Raglan House 120
 Elephant Road
 Apartment 1005 Raglan House 120
 Elephant Road
 Apartment 401 Raglan House 120
 Elephant Road
 1209 Portchester House 50 New Kent
 Road London
 1116 Portchester House 50 New Kent
 Road London
 1110 Portchester House 50 New Kent
 Road London
 813 Portchester House 50 New Kent
 Road London
 603 Portchester House 50 New Kent
 Road London
 501 Portchester House 50 New Kent
 Road London
 409 Portchester House 50 New Kent
 Road London
 407 Portchester House 50 New Kent
 Road London
 402 Portchester House 50 New Kent
 Road London
 306 Portchester House 50 New Kent
 Road London
 304 Portchester House 50 New Kent
 Road London
 Apartment 2506 Raglan House 120
 Elephant Road
 Apartment 2504 Raglan House 120
 Elephant Road
 Apartment 2303 Raglan House 120
 Elephant Road
 Apartment 2103 Raglan House 120
 Elephant Road
 Apartment 1905 Raglan House 120
 Elephant Road
 Apartment 1901 Raglan House 120
 Elephant Road
 Apartment 1804 Raglan House 120
 Elephant Road
 Studio 9 86 Walworth Road London
 Apartment 3101 8 Walworth Road
 London
 Apartment 2908 8 Walworth Road
 London
 Apartment 2804 8 Walworth Road
 London
 Apartment 2106 8 Walworth Road
 London
 Apartment 2101 8 Walworth Road
 London
 Apartment 1808 8 Walworth Road
 London
 Apartment 1701 8 Walworth Road

London	Apartment 606 Maurice House 4 Ash Avenue
Apartment 1604 8 Walworth Road	Apartment 603 Maurice House 4 Ash Avenue
London	Apartment 403 Maurice House 4 Ash Avenue
Apartment 2606 8 Walworth Road	Apartment 301 Maurice House 4 Ash Avenue
London	Apartment 203 Maurice House 4 Ash Avenue
Apartment 2601 8 Walworth Road	Apartment 202 Maurice House 4 Ash Avenue
London	Apartment 105 Maurice House 4 Ash Avenue
Apartment 2307 8 Walworth Road	Apartment 101 Maurice House 4 Ash Avenue
London	Apartment 901 Vowler House 10 Ash Avenue
Apartment 2303 8 Walworth Road	Apartment 802 Vowler House 10 Ash Avenue
London	Apartment 701 Vowler House 10 Ash Avenue
Apartment 1508 8 Walworth Road	Apartment 105 Vowler House 10 Ash Avenue
London	Apartment 2208 New Cooper Point 52 New Kent Road
Apartment 1506 8 Walworth Road	Apartment 1907 New Cooper Point 52 New Kent Road
London	Apartment 1901 New Cooper Point 52 New Kent Road
Apartment 1208 8 Walworth Road	Apartment 1803 New Cooper Point 52 New Kent Road
London	Apartment 1708 New Cooper Point 52 New Kent Road
Apartment 1204 8 Walworth Road	Apartment 1706 New Cooper Point 52 New Kent Road
London	Apartment 1508 New Cooper Point 52 New Kent Road
Apartment 3905 8 Walworth Road	Apartment 1405 New Cooper Point 52 New Kent Road
London	Apartment 1207 New Cooper Point 52 New Kent Road
Apartment 3703 8 Walworth Road	Apartment 1205 New Cooper Point 52 New Kent Road
London	Apartment 1204 New Cooper Point 52 New Kent Road
Apartment 3702 8 Walworth Road	Apartment 1202 New Cooper Point 52 New Kent Road
London	Apartment 1105 New Cooper Point 52 New Kent Road
Apartment 3606 8 Walworth Road	Apartment 1007 New Cooper Point 52 New Kent Road
London	
Apartment 3509 8 Walworth Road	
London	
Apartment 3404 8 Walworth Road	
London	
Apartment 908 8 Walworth Road London	
Apartment 702 8 Walworth Road London	
Apartment 606 8 Walworth Road London	
401 Julian Markham House 114 Walworth Road London	
701 Julian Markham House 114 Walworth Road London	
503 Julian Markham House 114 Walworth Road London	
92A Walworth Road London Southwark	
4 Wollaston Close Hampton Street London	
1 Wollaston Close Hampton Street London	
Gate 4 Arch 114 Elephant Road London	
Apartment 1002 Maurice House 4 Ash Avenue	
Apartment 901 Maurice House 4 Ash Avenue	
Apartment 804 Maurice House 4 Ash Avenue	

Apartment 901 New Cooper Point 52
 New Kent Road
 Apartment 706 New Cooper Point 52
 New Kent Road
 Apartment 702 New Cooper Point 52
 New Kent Road
 Apartment 607 New Cooper Point 52
 New Kent Road
 Apartment 408 New Cooper Point 52
 New Kent Road
 Apartment 405 New Cooper Point 52
 New Kent Road
 Apartment 308 New Cooper Point 52
 New Kent Road
 Apartment 306 New Cooper Point 52
 New Kent Road
 Apartment 206 New Cooper Point 52
 New Kent Road
 Apartment 202 New Cooper Point 52
 New Kent Road
 2 Ash Avenue London Southwark
 Unit 2 40 Elephant Road London
 Unit 1 40 Elephant Road London
 Arch 148 Eagle Yard Hampton Street
 Unit 1 Arch 146 Eagle Yard Hampton
 Street
 Arch 142 Eagle Yard Hampton Street
 Ground Floor Julian Markham House
 114 Walworth Road
 Apartment 2002 Hurlock Heights 4
 Deacon Street
 Apartment 3003 Hurlock Heights 4
 Deacon Street
 Apartment 2704 Hurlock Heights 4
 Deacon Street
 Apartment 2703 Hurlock Heights 4
 Deacon Street
 Apartment 2505 Hurlock Heights 4
 Deacon Street
 Apartment 2305 Hurlock Heights 4
 Deacon Street
 Apartment 2303 Hurlock Heights 4
 Deacon Street
 Apartment 2208 Hurlock Heights 4
 Deacon Street
 Apartment 2205 Hurlock Heights 4
 Deacon Street
 Apartment 2202 Hurlock Heights 4
 Deacon Street
 Apartment 1906 Hurlock Heights 4
 Deacon Street
 Apartment 1605 Hurlock Heights 4
 Deacon Street
 Apartment 1401 Hurlock Heights 4
 Deacon Street
 Apartment 1306 Hurlock Heights 4
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 Apartment 1303 Hurlock Heights 4
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 Apartment 1007 Hurlock Heights 4
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 Apartment 908 Hurlock Heights 4
 Deacon Street
 Apartment 903 Hurlock Heights 4
 Deacon Street
 Apartment 901 Hurlock Heights 4
 Deacon Street
 Apartment 808 Hurlock Heights 4
 Deacon Street
 Apartment 607 Hurlock Heights 4
 Deacon Street
 Apartment 504 Hurlock Heights 4
 Deacon Street
 Apartment 502 Hurlock Heights 4
 Deacon Street
 Apartment 407 Hurlock Heights 4
 Deacon Street
 Apartment 406 Hurlock Heights 4
 Deacon Street
 Apartment 307 Hurlock Heights 4
 Deacon Street
 Apartment 306 Hurlock Heights 4
 Deacon Street
 Apartment 2404 New Cooper Point 52
 New Kent Road
 Apartment 1806 New Cooper Point 52
 New Kent Road
 Apartment 1805 New Cooper Point 52
 New Kent Road
 Apartment 1703 New Cooper Point 52
 New Kent Road
 Apartment 1702 New Cooper Point 52
 New Kent Road
 Apartment 1604 New Cooper Point 52
 New Kent Road
 Apartment 1505 New Cooper Point 52
 New Kent Road
 Apartment 1502 New Cooper Point 52
 New Kent Road
 Apartment 301 New Cooper Point 52
 New Kent Road
 Apartment 207 New Cooper Point 52
 New Kent Road
 Apartment 205 New Cooper Point 52

New Kent Road
 14 Ash Avenue London Southwark
 Unit 20 40 Elephant Road London
 Arch 149 Eagle Yard Hampton Street
 Apartment 3002 Hurlock Heights 4
 Deacon Street
 Apartment 2401 Hurlock Heights 4
 Deacon Street
 Apartment 2301 Hurlock Heights 4
 Deacon Street
 Apartment 2207 Hurlock Heights 4
 Deacon Street
 Apartment 2105 Hurlock Heights 4
 Deacon Street
 Apartment 2104 Hurlock Heights 4
 Deacon Street
 Apartment 2004 Hurlock Heights 4
 Deacon Street
 Apartment 1808 Hurlock Heights 4
 Deacon Street
 Apartment 1703 Hurlock Heights 4
 Deacon Street
 Apartment 1507 Hurlock Heights 4
 Deacon Street
 Apartment 1505 Hurlock Heights 4
 Deacon Street
 Apartment 1405 Hurlock Heights 4
 Deacon Street
 Apartment 1402 Hurlock Heights 4
 Deacon Street
 Apartment 302 Hurlock Heights 4
 Deacon Street
 1908 Portchester House 50 New Kent
 Road London
 809 Portchester House 50 New Kent
 Road London
 1709 Portchester House 50 New Kent
 Road London
 Apartment 2803 8 Walworth Road
 London
 11 Wollaston Close Hampton Street
 London
 Apartment 2502 Tantallon House 130
 Elephant Road
 Apartment 3406 8 Walworth Road
 London
 101 Julian Markham House 114
 Walworth Road London
 Apartment 603 8 Walworth Road London
 1006 Mawes House 5 Castle Square
 London
 1810 Portchester House 50 New Kent
 Road London
 Apartment 1301 Raglan House 120
 Elephant Road
 Apartment 903 Raglan House 120
 Elephant Road
 Apartment 1610 8 Walworth Road
 London
 1411 Portchester House 50 New Kent
 Road London
 Apartment 2309 8 Walworth Road
 London
 Apartment 1511 8 Walworth Road
 London
 605 Julian Markham House 114
 Walworth Road London
 Studio 10 86 Walworth Road London
 Apartment 207 8 Walworth Road London
 1203 Mawes House 5 Castle Square
 London
 1804 Portchester House 50 New Kent
 Road London
 1214 Portchester House 50 New Kent
 Road London
 601 Portchester House 50 New Kent
 Road London
 Unit 1 2 Spare Street London
 Railway Arch 4 Elephant Mews Elephant
 Road
 Flat 8 88 Walworth Road London
 Flat 704 Highline Building 10 Steedman
 Street
 Apartment 1003 Raglan House 120
 Elephant Road
 Apartment 902 Raglan House 120
 Elephant Road
 92 Walworth Road London Southwark
 1714 Portchester House 50 New Kent
 Road London
 1506 Portchester House 50 New Kent
 Road London
 Apartment 2306 Tantallon House 130
 Elephant Road
 Apartment 2101 Tantallon House 130
 Elephant Road
 1303 Mawes House 5 Castle Square
 London
 Apartment 1605 Tantallon House 130
 Elephant Road
 Apartment 1602 Tantallon House 130
 Elephant Road
 1102 Mawes House 5 Castle Square
 London

701 Mawes House 5 Castle Square
 London
 Apartment 1206 Tantallon House 130
 Elephant Road
 405 Mawes House 5 Castle Square
 London
 Apartment 303 Tantallon House 130
 Elephant Road
 134 Elephant Road London Southwark
 2009 Portchester House 50 New Kent
 Road London
 1910 Portchester House 50 New Kent
 Road London
 Apartment 2406 Raglan House 120
 Elephant Road
 Apartment 902 New Cooper Point 52
 New Kent Road
 Apartment 805 New Cooper Point 52
 New Kent Road
 Apartment 802 New Cooper Point 52
 New Kent Road
 Apartment 801 New Cooper Point 52
 New Kent Road
 Apartment 708 New Cooper Point 52
 New Kent Road
 Apartment 608 New Cooper Point 52
 New Kent Road
 Apartment 505 New Cooper Point 52
 New Kent Road
 Apartment 402 New Cooper Point 52
 New Kent Road
 Apartment 304 New Cooper Point 52
 New Kent Road
 Apartment 208 New Cooper Point 52
 New Kent Road
 Apartment 204 New Cooper Point 52
 New Kent Road
 6 Ash Avenue London Southwark
 Unit 19 40 Elephant Road London
 Unit 7 40 Elephant Road London
 Unit 4 40 Elephant Road London
 First Floor Arch 147 Eagle Yard
 Hampton Street
 Arch 140 Eagle Yard Hampton Street
 Apartment 2901 Hurlock Heights 4
 Deacon Street
 Apartment 2803 Hurlock Heights 4
 Deacon Street
 Apartment 2802 Hurlock Heights 4
 Deacon Street
 Apartment 2701 Hurlock Heights 4
 Deacon Street
 Apartment 2506 Hurlock Heights 4
 Deacon Street
 Apartment 2501 Hurlock Heights 4
 Deacon Street
 Apartment 2406 Hurlock Heights 4
 Deacon Street
 Apartment 2403 Hurlock Heights 4
 Deacon Street
 Apartment 2308 Hurlock Heights 4
 Deacon Street
 Apartment 2103 Hurlock Heights 4
 Deacon Street
 Apartment 2007 Hurlock Heights 4
 Deacon Street
 Apartment 1908 Hurlock Heights 4
 Deacon Street
 Apartment 1806 Hurlock Heights 4
 Deacon Street
 Apartment 1802 Hurlock Heights 4
 Deacon Street
 Apartment 1707 Hurlock Heights 4
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 Apartment 1608 Hurlock Heights 4
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 Apartment 1308 Hurlock Heights 4
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 Apartment 1304 Hurlock Heights 4
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 Apartment 905 Hurlock Heights 4
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 Apartment 904 Hurlock Heights 4
 Deacon Street
 Apartment 807 Hurlock Heights 4
 Deacon Street
 Apartment 803 Hurlock Heights 4
 Deacon Street
 Apartment 604 Hurlock Heights 4
 Deacon Street
 Apartment 506 Hurlock Heights 4
 Deacon Street
 Apartment 404 Hurlock Heights 4
 Deacon Street
 Apartment 503 Hurlock Heights 4
 Deacon Street
 Apartment 403 Hurlock Heights 4
 Deacon Street
 Apartment 308 Hurlock Heights 4
 Deacon Street
 Apartment 205 Hurlock Heights 4
 Deacon Street
 Apartment 1404 Tantallon House 130
 Elephant Road

Management Office 8 Walworth Road London	New Kent Road
Apartment 2102 Raglan House 120 Elephant Road	Apartment 808 New Cooper Point 52 New Kent Road
1203 Portchester House 50 New Kent Road London	Apartment 807 New Cooper Point 52 New Kent Road
Elephant Park Sayer Street London	Apartment 803 New Cooper Point 52 New Kent Road
Apartment 2002 Tantallon House 130 Elephant Road	Apartment 707 New Cooper Point 52 New Kent Road
1005 Mawes House 5 Castle Square London	Apartment 508 New Cooper Point 52 New Kent Road
Apartment 610 8 Walworth Road London	Apartment 507 New Cooper Point 52 New Kent Road
Apartment 1507 8 Walworth Road London	Apartment 506 New Cooper Point 52 New Kent Road
Apartment 1003 Tantallon House 130 Elephant Road	Apartment 302 New Cooper Point 52 New Kent Road
Apartment 603 Tantallon House 130 Elephant Road	Unit 11 To 12 40 Elephant Road London
Apartment 4202 8 Walworth Road London	8 Ash Avenue London Southwark
1601 Mawes House 5 Castle Square London	Unit 5 40 Elephant Road London
Flat 603 Highline Building 10 Steedman Street	Apartment 2502 Hurlock Heights 4 Deacon Street
Flat 101 Highline Building 10 Steedman Street	Apartment 2404 Hurlock Heights 4 Deacon Street
2002 Portchester House 50 New Kent Road London	Apartment 2204 Hurlock Heights 4 Deacon Street
1705 Portchester House 50 New Kent Road London	Apartment 2201 Hurlock Heights 4 Deacon Street
611 Portchester House 50 New Kent Road London	Apartment 2102 Hurlock Heights 4 Deacon Street
Second Floor Flat 84 Walworth Road London	Apartment 2006 Hurlock Heights 4 Deacon Street
Apartment 2306 Raglan House 120 Elephant Road	Apartment 2001 Hurlock Heights 4 Deacon Street
Apartment 2201 8 Walworth Road London	Apartment 1706 Hurlock Heights 4 Deacon Street
1706 Portchester House 50 New Kent Road London	Apartment 1502 Hurlock Heights 4 Deacon Street
1610 Portchester House 50 New Kent Road London	Apartment 1407 Hurlock Heights 4 Deacon Street
Railway Arch 3 Elephant Mews Elephant Road	Apartment 1404 Hurlock Heights 4 Deacon Street
Apartment 203 8 Walworth Road London	Apartment 1302 Hurlock Heights 4 Deacon Street
Apartment 1208 New Cooper Point 52 New Kent Road	Apartment 1204 Hurlock Heights 4 Deacon Street
Apartment 1206 New Cooper Point 52 New Kent Road	Apartment 1201 Hurlock Heights 4 Deacon Street
Apartment 1201 New Cooper Point 52 New Kent Road	Apartment 1003 Hurlock Heights 4 Deacon Street
Apartment 1104 New Cooper Point 52	Apartment 1001 Hurlock Heights 4 Deacon Street

Apartment 907 Hurlock Heights 4
 Deacon Street
 Apartment 902 Hurlock Heights 4
 Deacon Street
 Apartment 2401 Raglan House 120
 Elephant Road
 1212 Portchester House 50 New Kent
 Road London
 1208 Portchester House 50 New Kent
 Road London
 1201 Portchester House 50 New Kent
 Road London
 605 Portchester House 50 New Kent
 Road London
 Apartment 1007 8 Walworth Road
 London
 Apartment 2410 8 Walworth Road
 London
 Apartment 2401 8 Walworth Road
 London
 Apartment 101 2 Walworth Road London
 6 Wollaston Close Hampton Street
 London
 Unit 4 And Unit 5 Farrell Court Elephant
 Road
 Apartment 4002 8 Walworth Road
 London
 Apartment 3806 8 Walworth Road
 London
 202 Julian Markham House 114
 Walworth Road London
 Apartment 2102 8 Walworth Road
 London
 Apartment 1809 8 Walworth Road
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 Apartment 1709 8 Walworth Road
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 Apartment 1606 8 Walworth Road
 London
 Apartment 3502 8 Walworth Road
 London
 Apartment 3302 8 Walworth Road
 London
 Third Floor Flat 84 Walworth Road
 London
 Third Floor Flat 6 Hampton Street
 London
 12 Walworth Road London Southwark
 Apartment 2404 Tantallon House 130
 Elephant Road
 Apartment 2305 Tantallon House 130
 Elephant Road
 Apartment 1603 Tantallon House 130
 Elephant Road
 Apartment 1503 Tantallon House 130
 Elephant Road
 Apartment 1104 Tantallon House 130
 Elephant Road
 Apartment 1101 Tantallon House 130
 Elephant Road
 Apartment 702 Vowler House 10 Ash
 Avenue
 Unit 4 2 Spare Street London
 Store 4 Spare Street London
 Unit 12 4 Spare Street London
 Unit 3 4 Spare Street London
 Unit 12 3 Spare Street London
 Unit 1 3 Elephant Road London
 Flat 202 Highline Building 10 Steedman
 Street
 1402 Mawes House 5 Castle Square
 London
 1401 Mawes House 5 Castle Square
 London
 1206 Mawes House 5 Castle Square
 London
 1204 Mawes House 5 Castle Square
 London
 905 Mawes House 5 Castle Square
 London
 903 Mawes House 5 Castle Square
 London
 306 Mawes House 5 Castle Square
 London
 304 Mawes House 5 Castle Square
 London
 7 Castle Square London Southwark
 2 Castle Square London Southwark
 11 Ash Avenue London Southwark
 1913 Portchester House 50 New Kent
 Road London
 1911 Portchester House 50 New Kent
 Road London
 Apartment 1602 Hurlock Heights 4
 Deacon Street
 Apartment 1408 Hurlock Heights 4
 Deacon Street
 Apartment 1307 Hurlock Heights 4
 Deacon Street
 Apartment 1207 Hurlock Heights 4
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 Apartment 1005 Hurlock Heights 4
 Deacon Street
 Apartment 802 Hurlock Heights 4

Deacon Street
 Apartment 703 Hurlock Heights 4
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 Apartment 605 Hurlock Heights 4
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 Apartment 601 Hurlock Heights 4
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 Apartment 507 Hurlock Heights 4
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 Apartment 106 Hurlock Heights 4
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 Apartment 105 Hurlock Heights 4
 Deacon Street
 Apartment 103 Hurlock Heights 4
 Deacon Street
 Unit 4 38 New Kent Road London
 503 Portchester House 50 New Kent
 Road London
 Apartment 806 Tantallon House 130
 Elephant Road
 141 Walworth Road London Southwark
 Apartment 3805 8 Walworth Road
 London
 205 Julian Markham House 114
 Walworth Road London
 1011 Portchester House 50 New Kent
 Road London
 Apartment 2002 Raglan House 120
 Elephant Road
 Apartment 1603 Raglan House 120
 Elephant Road
 Apartment 3006 8 Walworth Road
 London
 Apartment 2103 Tantallon House 130
 Elephant Road
 Apartment 702 Tantallon House 130
 Elephant Road
 602 Mawes House 5 Castle Square
 London
 307 Portchester House 50 New Kent
 Road London
 Apartment 2402 Raglan House 120
 Elephant Road
 Apartment 3003 8 Walworth Road
 London
 Apartment 2208 8 Walworth Road
 London
 2 Hampton House Hampton Street
 London
 Flat 501 Highline Building 10 Steedman
 Street
 Flat 203 Highline Building 10 Steedman
 Street
 Flat 105 Highline Building 10 Steedman
 Street
 Arch 152 10 Steedman Street London
 Apartment 905 Raglan House 120
 Elephant Road
 1808 Portchester House 50 New Kent
 Road London
 1511 Portchester House 50 New Kent
 Road London
 1409 Portchester House 50 New Kent
 Road London
 1703 Mawes House 5 Castle Square
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 1305 Mawes House 5 Castle Square
 London
 1208 Mawes House 5 Castle Square
 London
 Apartment 1906 Tantallon House 130
 Elephant Road
 Apartment 1904 Tantallon House 130
 Elephant Road
 Apartment 1802 Tantallon House 130
 Elephant Road
 Apartment 1701 Tantallon House 130
 Elephant Road
 Apartment 1501 Tantallon House 130
 Elephant Road
 503 Mawes House 5 Castle Square
 London
 Apartment 1004 Tantallon House 130
 Elephant Road
 Apartment 606 Tantallon House 130
 Elephant Road
 Apartment 2502 Raglan House 120
 Elephant Road
 Apartment 1803 Raglan House 120
 Elephant Road
 Unit 11 4 Spare Street London
 1106 Portchester House 50 New Kent
 Road London
 915 Portchester House 50 New Kent
 Road London
 909 Portchester House 50 New Kent
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 804 Portchester House 50 New Kent
 Road London
 707 Portchester House 50 New Kent
 Road London
 416 Portchester House 50 New Kent
 Road London
 1406 Portchester House 50 New Kent

Road London
 1403 Portchester House 50 New Kent
 Road London
 Apartment 1209 8 Walworth Road
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 Apartment 3104 8 Walworth Road
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 Apartment 906 8 Walworth Road London
 Apartment 903 8 Walworth Road London
 Apartment 810 8 Walworth Road London
 Apartment 2909 8 Walworth Road
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 Apartment 2711 8 Walworth Road
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 Apartment 2708 8 Walworth Road
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 Apartment 2611 8 Walworth Road
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 Apartment 4105 8 Walworth Road
 London
 Apartment 608 Hurlock Heights 4
 Deacon Street
 Apartment 602 Hurlock Heights 4
 Deacon Street
 Apartment 508 Hurlock Heights 4
 Deacon Street
 Apartment 101 Hurlock Heights 4
 Deacon Street
 Apartment 304 Hurlock Heights 4
 Deacon Street
 Apartment 207 Hurlock Heights 4
 Deacon Street
 Apartment 104 Hurlock Heights 4
 Deacon Street
 Apartment 601 Tantallon House 130
 Elephant Road
 Apartment 1503 Raglan House 120
 Elephant Road
 912 Portchester House 50 New Kent
 Road London
 Studio 3 Highline Building 10 Steedman
 Street
 1503 Portchester House 50 New Kent
 Road London
 606 Mawes House 5 Castle Square
 London
 Apartment 708 8 Walworth Road London
 Apartment 301 2 Walworth Road London
 Studio 7 86 Walworth Road London
 Studio 6 86 Walworth Road London
 Apartment 803 8 Walworth Road London
 Apartment 405 8 Walworth Road London

506 Julian Markham House 114
 Walworth Road London
 1301 Mawes House 5 Castle Square
 London
 Apartment 501 Raglan House 120
 Elephant Road
 907 Portchester House 50 New Kent
 Road London
 716 Portchester House 50 New Kent
 Road London
 Apartment 1204 Tantallon House 130
 Elephant Road
 Apartment 503 Tantallon House 130
 Elephant Road
 Unit 7 38 New Kent Road London
 Apartment 305 8 Walworth Road London
 Flat 204 Highline Building 10 Steedman
 Street
 1606 Portchester House 50 New Kent
 Road London
 1504 Portchester House 50 New Kent
 Road London
 23 Wollaston Close Hampton Street
 London
 204 Julian Markham House 114
 Walworth Road London
 Flat 7 88 Walworth Road London
 Flat 201 Highline Building 10 Steedman
 Street
 Apartment 1006 Raglan House 120
 Elephant Road
 Apartment 405 Raglan House 120
 Elephant Road
 1603 Portchester House 50 New Kent
 Road London
 Apartment 2405 Tantallon House 130
 Elephant Road
 Apartment 1706 Tantallon House 130
 Elephant Road
 704 Mawes House 5 Castle Square
 London
 Apartment 1201 Tantallon House 130
 Elephant Road
 Apartment 705 Tantallon House 130
 Elephant Road
 Apartment 505 Tantallon House 130
 Elephant Road
 Apartment 406 Tantallon House 130
 Elephant Road
 Apartment 404 Tantallon House 130
 Elephant Road
 Apartment 2304 Raglan House 120

Elephant Road	London
1802 Portchester House 50 New Kent Road London	Apartment 3005 8 Walworth Road London
1707 Portchester House 50 New Kent Road London	Apartment 2910 8 Walworth Road London
1515 Portchester House 50 New Kent Road London	Apartment 2811 8 Walworth Road London
1514 Portchester House 50 New Kent Road London	Apartment 2802 8 Walworth Road London
1512 Portchester House 50 New Kent Road London	Apartment 2011 8 Walworth Road London
1510 Portchester House 50 New Kent Road London	Apartment 2009 8 Walworth Road London
1404 Portchester House 50 New Kent Road London	Apartment 2006 8 Walworth Road London
1315 Portchester House 50 New Kent Road London	Apartment 2003 8 Walworth Road London
1302 Portchester House 50 New Kent Road London	Apartment 1811 8 Walworth Road London
Apartment 503 Raglan House 120 Elephant Road	Apartment 1802 8 Walworth Road London
Apartment 302 Raglan House 120 Elephant Road	Apartment 1704 8 Walworth Road London
1015 Portchester House 50 New Kent Road London	Apartment 2706 8 Walworth Road London
1005 Portchester House 50 New Kent Road London	Apartment 2408 8 Walworth Road London
1003 Portchester House 50 New Kent Road London	Apartment 2207 8 Walworth Road London
908 Portchester House 50 New Kent Road London	Apartment 1509 8 Walworth Road London
711 Portchester House 50 New Kent Road London	Apartment 1502 8 Walworth Road London
701 Portchester House 50 New Kent Road London	Apartment 1409 8 Walworth Road London
607 Portchester House 50 New Kent Road London	Apartment 1305 8 Walworth Road London
Apartment 2404 Raglan House 120 Elephant Road	Apartment 1109 8 Walworth Road London
Apartment 2105 Raglan House 120 Elephant Road	Apartment 1003 8 Walworth Road London
Apartment 2001 Raglan House 120 Elephant Road	Apartment 4201 8 Walworth Road London
Apartment 1903 Raglan House 120 Elephant Road	Apartment 4103 8 Walworth Road London
Studio 12 86 Walworth Road London	Apartment 4001 8 Walworth Road London
Studio 5 86 Walworth Road London	Apartment 510 8 Walworth Road London
Apartment 3203 8 Walworth Road London	5 Hampton House Hampton Street London
Apartment 3201 8 Walworth Road London	4 Hampton House Hampton Street London
Apartment 3111 8 Walworth Road	

Elephant And Castle Railway Station
 Elephant Road London
 Railway Arch 113 Elephant Road
 London
 Flat 701 Highline Building 10 Steedman
 Street
 Apartment 1303 Raglan House 120
 Elephant Road
 Apartment 1105 Raglan House 120
 Elephant Road
 Apartment 802 Raglan House 120
 Elephant Road
 Apartment 605 Raglan House 120
 Elephant Road
 4 Hampton Street London Southwark
 Apartment 402 Raglan House 120
 Elephant Road
 Apartment 303 Raglan House 120
 Elephant Road
 1813 Portchester House 50 New Kent
 Road London
 1701 Portchester House 50 New Kent
 Road London
 1615 Portchester House 50 New Kent
 Road London
 137 Walworth Road London Southwark
 1416 Portchester House 50 New Kent
 Road London
 1403 Mawes House 5 Castle Square
 London
 Apartment 2202 Tantallon House 130
 Elephant Road
 Apartment 2106 Tantallon House 130
 Elephant Road
 Apartment 2104 Tantallon House 130
 Elephant Road
 Apartment 2005 Tantallon House 130
 Elephant Road
 1202 Mawes House 5 Castle Square
 London
 801 Mawes House 5 Castle Square
 London
 Apartment 804 Tantallon House 130
 Elephant Road
 408 Mawes House 5 Castle Square
 London
 308 Mawes House 5 Castle Square
 London
 2006 Portchester House 50 New Kent
 Road London
 Apartment 2505 Raglan House 120
 Elephant Road
 Apartment 2302 Raglan House 120
 Elephant Road
 Apartment 1807 8 Walworth Road
 London
 1408 Mawes House 5 Castle Square
 London
 1308 Mawes House 5 Castle Square
 London
 907 Mawes House 5 Castle Square
 London
 Apartment 2806 8 Walworth Road
 London
 Apartment 2602 8 Walworth Road
 London
 Apartment 2406 Tantallon House 130
 Elephant Road
 Apartment 306 Tantallon House 130
 Elephant Road
 1616 Portchester House 50 New Kent
 Road London
 Apartment 1302 Raglan House 120
 Elephant Road
 Apartment 603 Raglan House 120
 Elephant Road
 1205 Portchester House 50 New Kent
 Road London
 815 Portchester House 50 New Kent
 Road London
 805 Portchester House 50 New Kent
 Road London
 Apartment 3303 8 Walworth Road
 London
 Apartment 1803 8 Walworth Road
 London
 Apartment 2306 8 Walworth Road
 London
 104 Julian Markham House 114
 Walworth Road London
 Apartment 3901 8 Walworth Road
 London
 301 Julian Markham House 114
 Walworth Road London
 Apartment 1907 8 Walworth Road
 London
 Apartment 1611 8 Walworth Road
 London
 Apartment 3505 8 Walworth Road
 London
 Apartment 3402 8 Walworth Road
 London
 Apartment 3110 8 Walworth Road
 London

Apartment 1501 8 Walworth Road
 London
 702 Julian Markham House 114
 Walworth Road London
 603 Julian Markham House 114
 Walworth Road London
 Studio 13 86 Walworth Road London
 80-82 Walworth Road London
 Southwark
 Apartment 2504 Tantallon House 130
 Elephant Road
 Apartment 2403 Tantallon House 130
 Elephant Road
 Apartment 2303 Tantallon House 130
 Elephant Road
 Apartment 2003 Tantallon House 130
 Elephant Road
 Apartment 1601 Tantallon House 130
 Elephant Road
 Apartment 1502 Tantallon House 130
 Elephant Road
 Apartment 904 Tantallon House 130
 Elephant Road
 Apartment 704 Tantallon House 130
 Elephant Road
 Apartment 504 Tantallon House 130
 Elephant Road
 Apartment 402 Tantallon House 130
 Elephant Road
 6 Deacon Street London Southwark
 7 Hampton Street London Southwark
 Flat 703 Highline Building 10 Steedman
 Street
 Flat 402 Highline Building 10 Steedman
 Street
 1407 Mawes House 5 Castle Square
 London
 1003 Mawes House 5 Castle Square
 London
 806 Mawes House 5 Castle Square
 London
 802 Mawes House 5 Castle Square
 London
 4 Castle Square London Southwark
 1801 Portchester House 50 New Kent
 Road London
 1502 Portchester House 50 New Kent
 Road London
 1413 Portchester House 50 New Kent
 Road London
 1310 Portchester House 50 New Kent
 Road London
 Apartment 403 Raglan House 120
 Elephant Road
 1113 Portchester House 50 New Kent
 Road London
 1107 Portchester House 50 New Kent
 Road London
 1010 Portchester House 50 New Kent
 Road London
 Apartment 2003 Raglan House 120
 Elephant Road
 Apartment 1904 Raglan House 120
 Elephant Road
 Apartment 1701 Raglan House 120
 Elephant Road
 Unit 5 4 Spare Street London
 1109 Portchester House 50 New Kent
 Road London
 1103 Portchester House 50 New Kent
 Road London
 807 Portchester House 50 New Kent
 Road London
 710 Portchester House 50 New Kent
 Road London
 Flat 401 Highline Building 10 Steedman
 Street
 702 Portchester House 50 New Kent
 Road London
 608 Portchester House 50 New Kent
 Road London
 516 Portchester House 50 New Kent
 Road London
 508 Portchester House 50 New Kent
 Road London
 1401 Portchester House 50 New Kent
 Road London
 1309 Portchester House 50 New Kent
 Road London
 1304 Portchester House 50 New Kent
 Road London
 Apartment 1106 8 Walworth Road
 London
 Apartment 1004 8 Walworth Road
 London
 Apartment 909 8 Walworth Road London
 Apartment 3010 8 Walworth Road
 London
 Apartment 3007 8 Walworth Road
 London
 Apartment 3001 8 Walworth Road
 London
 Apartment 2809 8 Walworth Road
 London

6 Walworth Road London Southwark
 Apartment 2510 8 Walworth Road
 London
 Apartment 2507 8 Walworth Road
 London
 Apartment 2502 8 Walworth Road
 London
 33 Wollaston Close Hampton Street
 London
 9 Wollaston Close Hampton Street
 London
 3 Wollaston Close Hampton Street
 London
 Store Wollaston Close Hampton Street
 Apartment 3904 8 Walworth Road
 London
 Apartment 3704 8 Walworth Road
 London
 Apartment 1904 8 Walworth Road
 London
 Apartment 1804 8 Walworth Road
 London
 Apartment 1504 8 Walworth Road
 London
 501 Julian Markham House 114
 Walworth Road London
 705 Julian Markham House 114
 Walworth Road London
 Flat 13 88 Walworth Road London
 Flat 12 88 Walworth Road London
 Flat 4 88 Walworth Road London
 Railway Arches 111 To 113 Elephant
 Road London
 8 Hampton House Hampton Street
 London
 Apartment 1505 Tantallon House 130
 Elephant Road
 Apartment 1406 Tantallon House 130
 Elephant Road
 Apartment 1306 Tantallon House 130
 Elephant Road
 Apartment 1304 Tantallon House 130
 Elephant Road
 Apartment 1302 Tantallon House 130
 Elephant Road
 Apartment 1301 Tantallon House 130
 Elephant Road
 Apartment 3705 8 Walworth Road
 London
 Apartment 3407 8 Walworth Road
 London
 Apartment 905 8 Walworth Road London
 Apartment 805 8 Walworth Road London
 Apartment 408 8 Walworth Road London
 Apartment 307 8 Walworth Road London
 Apartment 204 8 Walworth Road London
 106 Julian Markham House 114
 Walworth Road London
 6 Hampton Street London Southwark
 706 Julian Markham House 114
 Walworth Road London
 4 Steedman Street London Southwark
 32 Wollaston Close Hampton Street
 London
 26 Wollaston Close Hampton Street
 London
 21 Wollaston Close Hampton Street
 London
 18 Wollaston Close Hampton Street
 London
 5 Wollaston Close Hampton Street
 London
 2 Wollaston Close Hampton Street
 London
 Apartment 902 Maurice House 4 Ash
 Avenue
 Apartment 807 Maurice House 4 Ash
 Avenue
 Apartment 705 Maurice House 4 Ash
 Avenue
 Apartment 702 Maurice House 4 Ash
 Avenue
 Apartment 601 Maurice House 4 Ash
 Avenue
 Apartment 507 Maurice House 4 Ash
 Avenue
 Apartment 408 Maurice House 4 Ash
 Avenue
 Apartment 405 Maurice House 4 Ash
 Avenue
 Apartment 307 Maurice House 4 Ash
 Avenue
 Apartment 107 Maurice House 4 Ash
 Avenue
 Apartment 806 Vowler House 10 Ash
 Avenue
 Apartment 803 Vowler House 10 Ash
 Avenue
 Apartment 506 Vowler House 10 Ash
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 Apartment 505 Vowler House 10 Ash
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 Apartment 504 Vowler House 10 Ash
 Avenue

Apartment 502 Vowler House 10 Ash Avenue
 Apartment 403 Vowler House 10 Ash Avenue
 Apartment 204 Vowler House 10 Ash Avenue
 Apartment 203 Vowler House 10 Ash Avenue
 Apartment 202 Vowler House 10 Ash Avenue
 Apartment 2307 New Cooper Point 52 New Kent Road
 Apartment 2204 New Cooper Point 52 New Kent Road
 Apartment 2203 New Cooper Point 52 New Kent Road
 Apartment 2107 New Cooper Point 52 New Kent Road
 Apartment 1904 New Cooper Point 52 New Kent Road
 Apartment 1306 New Cooper Point 52 New Kent Road
 Apartment 1301 New Cooper Point 52 New Kent Road
 Apartment 1108 New Cooper Point 52 New Kent Road
 Apartment 1003 New Cooper Point 52 New Kent Road
 Apartment 1002 New Cooper Point 52 New Kent Road
 Apartment 1001 New Cooper Point 52 New Kent Road
 Apartment 1704 Raglan House 120 Elephant Road
 Unit 2 4 Spare Street London
 1114 Portchester House 50 New Kent Road London
 1101 Portchester House 50 New Kent Road London
 411 Portchester House 50 New Kent Road London
 401 Portchester House 50 New Kent Road London
 310 Portchester House 50 New Kent Road London
 906 Portchester House 50 New Kent Road London
 901 Portchester House 50 New Kent Road London
 713 Portchester House 50 New Kent Road London
 513 Portchester House 50 New Kent Road London
 90 Walworth Road London Southwark
 Apartment 1303 8 Walworth Road London
 Apartment 1103 8 Walworth Road London
 910 Portchester House 50 New Kent Road London
 905 Portchester House 50 New Kent Road London
 708 Portchester House 50 New Kent Road London
 604 Portchester House 50 New Kent Road London
 504 Portchester House 50 New Kent Road London
 Apartment 301 Tantallon House 130 Elephant Road
 Apartment 2405 Raglan House 120 Elephant Road
 Apartment 2301 Raglan House 120 Elephant Road
 Apartment 2101 Raglan House 120 Elephant Road
 First Floor Flat 4 Hampton Street London
 Studio 8 86 Walworth Road London
 100 Walworth Road London Southwark
 Apartment 3301 8 Walworth Road London
 Apartment 3210 8 Walworth Road London
 Apartment 3207 8 Walworth Road London
 Apartment 3106 8 Walworth Road London
 Apartment 2905 8 Walworth Road London
 Apartment 1607 8 Walworth Road London
 Apartment 2710 8 Walworth Road London
 Apartment 2704 8 Walworth Road London
 Apartment 2701 8 Walworth Road London
 Apartment 2505 8 Walworth Road London
 Apartment 2204 8 Walworth Road London
 Apartment 1402 8 Walworth Road London
 Apartment 1311 8 Walworth Road

London
 Apartment 1101 8 Walworth Road
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 Apartment 4104 8 Walworth Road
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 Apartment 3903 8 Walworth Road
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 Apartment 3902 8 Walworth Road
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 Apartment 3807 8 Walworth Road
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 Apartment 3709 8 Walworth Road
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 Apartment 705 8 Walworth Road London
 Apartment 704 8 Walworth Road London
 Apartment 501 8 Walworth Road London
 Apartment 310 8 Walworth Road London
 Apartment 309 8 Walworth Road London
 Apartment 202 8 Walworth Road London
 Apartment 303 2 Walworth Road London
 Apartment 102 2 Walworth Road London
 307 Julian Markham House 114
 Walworth Road London
 302 Julian Markham House 114
 Walworth Road London
 703 Julian Markham House 114
 Walworth Road London
 606 Julian Markham House 114
 Walworth Road London
 601 Julian Markham House 114
 Walworth Road London
 20 Wollaston Close Hampton Street
 London
 Apartment 1102 Maurice House 4 Ash
 Avenue
 Apartment 1003 Maurice House 4 Ash
 Avenue
 Apartment 1205 Tantallon House 130
 Elephant Road
 Apartment 403 Tantallon House 130
 Elephant Road
 135 Walworth Road London Southwark
 Unit 11 3 Spare Street London
 Unit 8 3 Spare Street London
 Studio 2 Highline Building 10 Steedman
 Street
 Flat 601 Highline Building 10 Steedman
 Street
 Flat 303 Highline Building 10 Steedman
 Street
 Flat 102 Highline Building 10 Steedman
 Street
 1504 Mawes House 5 Castle Square
 London
 1307 Mawes House 5 Castle Square
 London
 1201 Mawes House 5 Castle Square
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 1106 Mawes House 5 Castle Square
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 1104 Mawes House 5 Castle Square
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 703 Mawes House 5 Castle Square
 London
 604 Mawes House 5 Castle Square
 London
 Unit 3 38 New Kent Road London
 2007 Portchester House 50 New Kent
 Road London
 1807 Portchester House 50 New Kent
 Road London
 1806 Portchester House 50 New Kent
 Road London
 1713 Portchester House 50 New Kent
 Road London
 1710 Portchester House 50 New Kent
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 1613 Portchester House 50 New Kent
 Road London
 1408 Portchester House 50 New Kent
 Road London
 1405 Portchester House 50 New Kent
 Road London
 1308 Portchester House 50 New Kent
 Road London
 1211 Portchester House 50 New Kent
 Road London
 Apartment 1502 Raglan House 120
 Elephant Road
 Apartment 1202 Raglan House 120
 Elephant Road
 Apartment 703 Raglan House 120
 Elephant Road
 Apartment 701 Raglan House 120
 Elephant Road
 Apartment 404 Raglan House 120
 Elephant Road
 1105 Portchester House 50 New Kent
 Road London
 1016 Portchester House 50 New Kent
 Road London
 911 Portchester House 50 New Kent
 Road London
 806 Portchester House 50 New Kent

Road London	Apartment 2408 Hurlock Heights 4
712 Portchester House 50 New Kent	Deacon Street
Road London	Apartment 2307 Hurlock Heights 4
616 Portchester House 50 New Kent	Deacon Street
Road London	Apartment 2304 Hurlock Heights 4
410 Portchester House 50 New Kent	Deacon Street
Road London	Apartment 2203 Hurlock Heights 4
Apartment 302 Tantallon House 130	Deacon Street
Elephant Road	Apartment 2107 Hurlock Heights 4
Apartment 2202 Raglan House 120	Deacon Street
Elephant Road	Apartment 2003 Hurlock Heights 4
Apartment 1602 Raglan House 120	Deacon Street
Elephant Road	Apartment 1905 Hurlock Heights 4
5 Spare Street London Southwark	Deacon Street
4 Spare Street London Southwark	Apartment 1904 Hurlock Heights 4
Studio 14 86 Walworth Road London	Deacon Street
Railway Arch 122 Elephant Road	Apartment 1501 Hurlock Heights 4
London	Deacon Street
Apartment 3401 8 Walworth Road	Apartment 1305 Hurlock Heights 4
London	Deacon Street
Apartment 3307 8 Walworth Road	Apartment 1206 Hurlock Heights 4
London	Deacon Street
Apartment 3209 8 Walworth Road	Apartment 1205 Hurlock Heights 4
London	Deacon Street
Apartment 904 New Cooper Point 52	Apartment 1203 Hurlock Heights 4
New Kent Road	Deacon Street
Apartment 903 New Cooper Point 52	Apartment 1202 Hurlock Heights 4
New Kent Road	Deacon Street
Apartment 806 New Cooper Point 52	Apartment 1106 Hurlock Heights 4
New Kent Road	Deacon Street
Apartment 606 New Cooper Point 52	Apartment 1008 Hurlock Heights 4
New Kent Road	Deacon Street
Apartment 406 New Cooper Point 52	Apartment 1002 Hurlock Heights 4
New Kent Road	Deacon Street
Unit 21 40 Elephant Road London	Apartment 801 Hurlock Heights 4
Unit 17 40 Elephant Road London	Deacon Street
Unit 15 40 Elephant Road London	Apartment 708 Hurlock Heights 4
Unit 10 40 Elephant Road London	Deacon Street
Arch 144 Eagle Yard Hampton Street	Apartment 402 Hurlock Heights 4
Arch 150 Eagle Yard Hampton Street	Deacon Street
Second Floor Arch 147 Eagle Yard	Apartment 405 Hurlock Heights 4
Hampton Street	Deacon Street
Arch 147 Eagle Yard Hampton Street	Apartment 401 Hurlock Heights 4
Arch 146 Eagle Yard Hampton Street	Deacon Street
Apartment 2906 Hurlock Heights 4	Apartment 301 Hurlock Heights 4
Deacon Street	Deacon Street
Apartment 2606 Hurlock Heights 4	Apartment 206 Hurlock Heights 4
Deacon Street	Deacon Street
Apartment 2604 Hurlock Heights 4	Apartment 201 Hurlock Heights 4
Deacon Street	Deacon Street
Apartment 2503 Hurlock Heights 4	1404 Mawes House 5 Castle Square
Deacon Street	London

Apartment 2007 8 Walworth Road
 London
 308 Portchester House 50 New Kent
 Road London
 705 Portchester House 50 New Kent
 Road London
 Apartment 601 8 Walworth Road London
 Apartment 407 8 Walworth Road London
 Apartment 404 8 Walworth Road London
 Apartment 2407 8 Walworth Road
 London
 Apartment 2108 8 Walworth Road
 London
 28 Wollaston Close Hampton Street
 London
 19 Wollaston Close Hampton Street
 London
 17 Wollaston Close Hampton Street
 London
 Apartment 3701 8 Walworth Road
 London
 Apartment 1801 8 Walworth Road
 London
 Apartment 1706 8 Walworth Road
 London
 Apartment 3408 8 Walworth Road
 London
 Apartment 3405 8 Walworth Road
 London
 Apartment 3211 8 Walworth Road
 London
 Flat 10 88 Walworth Road London
 Flat 9 88 Walworth Road London
 Flat 92 Walworth Road London
 Flat 5 88 Walworth Road London
 1 Hampton House Hampton Street
 London
 14 Walworth Road London Southwark
 First Floor Flat 6 Hampton Street London
 Apartment 2401 Tantallon House 130
 Elephant Road
 Apartment 2203 Tantallon House 130
 Elephant Road
 Apartment 2201 Tantallon House 130
 Elephant Road
 Apartment 1902 Tantallon House 130
 Elephant Road
 Apartment 1703 Tantallon House 130
 Elephant Road
 Apartment 1606 Tantallon House 130
 Elephant Road
 Apartment 1202 Tantallon House 130
 Elephant Road
 Apartment 906 Tantallon House 130
 Elephant Road
 Apartment 506 Tantallon House 130
 Elephant Road
 Unit 2 2 Spare Street London
 Unit 6 3 Spare Street London
 133C Elephant Road London Southwark
 Flat 404 Highline Building 10 Steedman
 Street
 Flat 106 Highline Building 10 Steedman
 Street
 1603 Mawes House 5 Castle Square
 London
 Apartment 1001 Maurice House 4 Ash
 Avenue
 Apartment 806 Maurice House 4 Ash
 Avenue
 Apartment 802 Maurice House 4 Ash
 Avenue
 Apartment 703 Maurice House 4 Ash
 Avenue
 Apartment 501 Maurice House 4 Ash
 Avenue
 Apartment 305 Maurice House 4 Ash
 Avenue
 Apartment 304 Maurice House 4 Ash
 Avenue
 Apartment 302 Maurice House 4 Ash
 Avenue
 Apartment 103 Maurice House 4 Ash
 Avenue
 Apartment 102 Maurice House 4 Ash
 Avenue
 Apartment 804 Vowler House 10 Ash
 Avenue
 Apartment 705 Vowler House 10 Ash
 Avenue
 Apartment 602 Vowler House 10 Ash
 Avenue
 Apartment 503 Vowler House 10 Ash
 Avenue
 Apartment 406 Vowler House 10 Ash
 Avenue
 Apartment 302 Vowler House 10 Ash
 Avenue
 Apartment 206 Vowler House 10 Ash
 Avenue
 Apartment 103 Vowler House 10 Ash
 Avenue
 Apartment 102 Vowler House 10 Ash
 Avenue

Apartment 101 Vowler House 10 Ash Avenue	Apartment 1405 8 Walworth Road London
Apartment 2305 New Cooper Point 52 New Kent Road	Apartment 1304 8 Walworth Road London
Apartment 2304 New Cooper Point 52 New Kent Road	Apartment 1104 8 Walworth Road London
Apartment 2303 New Cooper Point 52 New Kent Road	Apartment 4101 8 Walworth Road London
Apartment 2108 New Cooper Point 52 New Kent Road	Apartment 3804 8 Walworth Road London
Apartment 2105 New Cooper Point 52 New Kent Road	Apartment 3608 8 Walworth Road London
Apartment 2007 New Cooper Point 52 New Kent Road	Apartment 3602 8 Walworth Road London
Apartment 2003 New Cooper Point 52 New Kent Road	Apartment 3506 8 Walworth Road London
Apartment 1808 New Cooper Point 52 New Kent Road	Apartment 901 8 Walworth Road London
Apartment 1804 New Cooper Point 52 New Kent Road	Apartment 710 8 Walworth Road London
Apartment 1701 New Cooper Point 52 New Kent Road	Apartment 609 8 Walworth Road London
Apartment 1506 New Cooper Point 52 New Kent Road	Apartment 602 8 Walworth Road London
Apartment 1303 New Cooper Point 52 New Kent Road	Apartment 406 8 Walworth Road London
Apartment 2902 8 Walworth Road London	Apartment 402 8 Walworth Road London
Apartment 2807 8 Walworth Road London	Apartment 306 8 Walworth Road London
Apartment 2109 8 Walworth Road London	Apartment 302 8 Walworth Road London
Apartment 2104 8 Walworth Road London	Apartment 208 8 Walworth Road London
Apartment 1908 8 Walworth Road London	Apartment 103 2 Walworth Road London
Apartment 1905 8 Walworth Road London	306 Julian Markham House 114 Walworth Road London
Apartment 1902 8 Walworth Road London	201 Julian Markham House 114 Walworth Road London
Apartment 1702 8 Walworth Road London	505 Julian Markham House 114 Walworth Road London
Apartment 1605 8 Walworth Road London	31 Wollaston Close Hampton Street London
Apartment 2603 8 Walworth Road London	27 Wollaston Close Hampton Street London
Apartment 2409 8 Walworth Road London	Apartment 808 Maurice House 4 Ash Avenue
Apartment 2305 8 Walworth Road London	Apartment 805 Maurice House 4 Ash Avenue
Apartment 2202 8 Walworth Road London	Apartment 707 Maurice House 4 Ash Avenue
	Apartment 706 Maurice House 4 Ash Avenue
	Apartment 704 Maurice House 4 Ash Avenue
	Apartment 604 Maurice House 4 Ash Avenue
	Apartment 506 Maurice House 4 Ash Avenue
	Apartment 208 Maurice House 4 Ash Avenue

Apartment 205 Maurice House 4 Ash Avenue
 Apartment 108 Maurice House 4 Ash Avenue
 Apartment 104 Maurice House 4 Ash Avenue
 Apartment 805 Vowler House 10 Ash Avenue
 Apartment 706 Vowler House 10 Ash Avenue
 Apartment 604 Vowler House 10 Ash Avenue
 25 Wollaston Close Hampton Street London
 Apartment 1206 8 Walworth Road London
 Apartment 1008 8 Walworth Road London
 Apartment 3605 8 Walworth Road London
 Apartment 2005 8 Walworth Road London
 1012 Portchester House 50 New Kent Road London
 Apartment 2304 Tantallon House 130 Elephant Road
 1907 Portchester House 50 New Kent Road London
 Flat 801 Highline Building 10 Steedman Street
 3 Ash Avenue London Southwark
 1316 Portchester House 50 New Kent Road London
 Apartment 1002 Raglan House 120 Elephant Road
 1102 Portchester House 50 New Kent Road London
 Apartment 2006 Raglan House 120 Elephant Road
 Apartment 3109 8 Walworth Road London
 Apartment 1609 8 Walworth Road London
 Apartment 1308 8 Walworth Road London
 Apartment 904 8 Walworth Road London
 Apartment 707 8 Walworth Road London
 Apartment 2506 Tantallon House 130 Elephant Road
 708 Julian Markham House 114 Walworth Road London
 Unit 6 Farrell Court Elephant Road
 Flat 6 88 Walworth Road London
 Flat 3 88 Walworth Road London
 Flat 602 Highline Building 10 Steedman Street
 Apartment 1305 Raglan House 120 Elephant Road
 Apartment 505 Raglan House 120 Elephant Road
 1704 Portchester House 50 New Kent Road London
 1608 Portchester House 50 New Kent Road London
 1605 Portchester House 50 New Kent Road London
 1705 Mawes House 5 Castle Square London
 Apartment 2505 Tantallon House 130 Elephant Road
 Apartment 2402 Tantallon House 130 Elephant Road
 Apartment 2205 Tantallon House 130 Elephant Road
 904 Mawes House 5 Castle Square London
 804 Mawes House 5 Castle Square London
 706 Mawes House 5 Castle Square London
 603 Mawes House 5 Castle Square London
 Apartment 1303 Tantallon House 130 Elephant Road
 Apartment 1105 Tantallon House 130 Elephant Road
 Apartment 1001 Tantallon House 130 Elephant Road
 Apartment 305 Tantallon House 130 Elephant Road
 Unit 1 38 New Kent Road London
 6 Castle Square London Southwark
 Apartment 2403 Raglan House 120 Elephant Road
 Apartment 2201 Raglan House 120 Elephant Road
 Apartment 1601 Raglan House 120 Elephant Road
 Unit 10 3 Spare Street London
 Unit 4 3 Spare Street London
 Apartment 405 Vowler House 10 Ash Avenue
 Apartment 301 Vowler House 10 Ash Avenue

Apartment 2408 New Cooper Point 52 New Kent Road	Apartment 307 New Cooper Point 52 New Kent Road
Apartment 2405 New Cooper Point 52 New Kent Road	Unit 13 40 Elephant Road London
Apartment 2403 New Cooper Point 52 New Kent Road	Unit 9 40 Elephant Road London
Apartment 2401 New Cooper Point 52 New Kent Road	Unit 6 40 Elephant Road London
Apartment 2306 New Cooper Point 52 New Kent Road	Unit 3 40 Elephant Road London
Apartment 2302 New Cooper Point 52 New Kent Road	Apartment 2905 Hurlock Heights 4 Deacon Street
Apartment 2202 New Cooper Point 52 New Kent Road	Apartment 2904 Hurlock Heights 4 Deacon Street
Apartment 2101 New Cooper Point 52 New Kent Road	Apartment 2903 Hurlock Heights 4 Deacon Street
Apartment 1903 New Cooper Point 52 New Kent Road	Apartment 2804 Hurlock Heights 4 Deacon Street
Apartment 1802 New Cooper Point 52 New Kent Road	Apartment 2605 Hurlock Heights 4 Deacon Street
Apartment 1607 New Cooper Point 52 New Kent Road	Apartment 2602 Hurlock Heights 4 Deacon Street
Apartment 1605 New Cooper Point 52 New Kent Road	Apartment 2405 Hurlock Heights 4 Deacon Street
Apartment 1603 New Cooper Point 52 New Kent Road	Apartment 2302 Hurlock Heights 4 Deacon Street
Apartment 1504 New Cooper Point 52 New Kent Road	Apartment 2108 Hurlock Heights 4 Deacon Street
Apartment 1404 New Cooper Point 52 New Kent Road	Apartment 2005 Hurlock Heights 4 Deacon Street
Apartment 1302 New Cooper Point 52 New Kent Road	Apartment 1804 Hurlock Heights 4 Deacon Street
Apartment 1102 New Cooper Point 52 New Kent Road	Apartment 1803 Hurlock Heights 4 Deacon Street
Apartment 906 New Cooper Point 52 New Kent Road	Apartment 1708 Hurlock Heights 4 Deacon Street
Apartment 705 New Cooper Point 52 New Kent Road	Unit 1 3 Spare Street London
Apartment 704 New Cooper Point 52 New Kent Road	1014 Portchester House 50 New Kent Road London
Apartment 605 New Cooper Point 52 New Kent Road	1006 Portchester House 50 New Kent Road London
Apartment 504 New Cooper Point 52 New Kent Road	413 Portchester House 50 New Kent Road London
Apartment 501 New Cooper Point 52 New Kent Road	408 Portchester House 50 New Kent Road London
Apartment 407 New Cooper Point 52 New Kent Road	615 Portchester House 50 New Kent Road London
Apartment 404 New Cooper Point 52 New Kent Road	602 Portchester House 50 New Kent Road London
Apartment 401 New Cooper Point 52 New Kent Road	510 Portchester House 50 New Kent Road London
	505 Portchester House 50 New Kent Road London
	Apartment 1309 8 Walworth Road London
	Apartment 1301 8 Walworth Road

London
 Apartment 1108 8 Walworth Road
 London
 Apartment 1001 8 Walworth Road
 London
 Apartment 3102 8 Walworth Road
 London
 Apartment 3004 8 Walworth Road
 London
 Apartment 2702 8 Walworth Road
 London
 Apartment 4102 8 Walworth Road
 London
 Apartment 4005 8 Walworth Road
 London
 Apartment 604 8 Walworth Road London
 Apartment 505 8 Walworth Road London
 Apartment 503 8 Walworth Road London
 Apartment 2404 8 Walworth Road
 London
 Apartment 209 8 Walworth Road London
 Apartment 201 2 Walworth Road London
 Apartment 2105 8 Walworth Road
 London
 22 Wollaston Close Hampton Street
 London
 Apartment 1901 8 Walworth Road
 London
 Railway Arch 5 Elephant Mews Elephant
 Road
 Unit 7 Farrell Court Elephant Road
 3 Hampton House Hampton Street
 London
 10 Walworth Road London Southwark
 Crossway Church Hampton Street
 London
 Apartment 2206 Tantallon House 130
 Elephant Road
 Apartment 1905 Tantallon House 130
 Elephant Road
 Apartment 1803 Tantallon House 130
 Elephant Road
 Apartment 1705 Tantallon House 130
 Elephant Road
 Apartment 1604 Tantallon House 130
 Elephant Road
 Apartment 1203 Tantallon House 130
 Elephant Road
 Apartment 1106 Tantallon House 130
 Elephant Road
 Apartment 701 Tantallon House 130
 Elephant Road
 Unit 10 4 Spare Street London
 Unit 5 3 Spare Street London
 Flat 302 Highline Building 10 Steedman
 Street
 Arch 150 10 Steedman Street London
 906 Mawes House 5 Castle Square
 London
 808 Mawes House 5 Castle Square
 London
 707 Mawes House 5 Castle Square
 London
 507 Mawes House 5 Castle Square
 London
 504 Mawes House 5 Castle Square
 London
 1304 Mawes House 5 Castle Square
 London
 1302 Mawes House 5 Castle Square
 London
 1103 Mawes House 5 Castle Square
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 1101 Mawes House 5 Castle Square
 London
 1004 Mawes House 5 Castle Square
 London
 908 Mawes House 5 Castle Square
 London
 7 Elephant Road London Southwark
 601 Mawes House 5 Castle Square
 London
 407 Mawes House 5 Castle Square
 London
 303 Mawes House 5 Castle Square
 London
 301 Mawes House 5 Castle Square
 London
 2008 Portchester House 50 New Kent
 Road London
 1607 Portchester House 50 New Kent
 Road London
 1407 Portchester House 50 New Kent
 Road London
 1305 Portchester House 50 New Kent
 Road London
 Apartment 1304 Raglan House 120
 Elephant Road
 Apartment 1106 Raglan House 120
 Elephant Road
 Apartment 704 Raglan House 120
 Elephant Road
 1204 Portchester House 50 New Kent
 Road London

1008 Portchester House 50 New Kent Road London	Apartment 2311 8 Walworth Road London
1007 Portchester House 50 New Kent Road London	Apartment 2308 8 Walworth Road London
914 Portchester House 50 New Kent Road London	Apartment 1705 Hurlock Heights 4 Deacon Street
913 Portchester House 50 New Kent Road London	Apartment 1607 Hurlock Heights 4 Deacon Street
614 Portchester House 50 New Kent Road London	Apartment 1103 Hurlock Heights 4 Deacon Street
612 Portchester House 50 New Kent Road London	Apartment 1101 Hurlock Heights 4 Deacon Street
606 Portchester House 50 New Kent Road London	Apartment 806 Hurlock Heights 4 Deacon Street
509 Portchester House 50 New Kent Road London	Apartment 805 Hurlock Heights 4 Deacon Street
412 Portchester House 50 New Kent Road London	Apartment 706 Hurlock Heights 4 Deacon Street
311 Portchester House 50 New Kent Road London	Apartment 705 Hurlock Heights 4 Deacon Street
303 Portchester House 50 New Kent Road London	Apartment 704 Hurlock Heights 4 Deacon Street
Apartment 2204 Raglan House 120 Elephant Road	Apartment 702 Hurlock Heights 4 Deacon Street
Apartment 2106 Raglan House 120 Elephant Road	610 Portchester House 50 New Kent Road London
Apartment 2004 Raglan House 120 Elephant Road	302 Portchester House 50 New Kent Road London
Apartment 1705 Raglan House 120 Elephant Road	Apartment 3706 8 Walworth Road London
Apartment 1504 Raglan House 120 Elephant Road	1009 Portchester House 50 New Kent Road London
Apartment 3105 8 Walworth Road London	Flat 304 Highline Building 10 Steedman Street
Apartment 3011 8 Walworth Road London	Apartment 1406 Raglan House 120 Elephant Road
Apartment 3008 8 Walworth Road London	Apartment 1405 Tantallon House 130 Elephant Road
Apartment 2110 8 Walworth Road London	Apartment 3208 8 Walworth Road London
Apartment 2107 8 Walworth Road London	Apartment 2604 8 Walworth Road London
Apartment 1903 8 Walworth Road London	Apartment 1205 8 Walworth Road London
Apartment 1705 8 Walworth Road London	608 Mawes House 5 Castle Square London
Apartment 2709 8 Walworth Road London	404 Julian Markham House 114 Walworth Road London
Apartment 2707 8 Walworth Road London	403 Portchester House 50 New Kent Road London
Apartment 2511 8 Walworth Road London	10 Wollaston Close Hampton Street London

Flat 802 Highline Building 10 Steedman Street
 131 Walworth Road London Southwark
 Apartment 1805 Tantallon House 130 Elephant Road
 Apartment 1906 Raglan House 120 Elephant Road
 Apartment 2111 8 Walworth Road London
 14 Wollaston Close Hampton Street London
 Apartment 3205 8 Walworth Road London
 814 Portchester House 50 New Kent Road London
 Apartment 1801 Tantallon House 130 Elephant Road
 Apartment 1402 Tantallon House 130 Elephant Road
 Apartment 1005 Tantallon House 130 Elephant Road
 1001 Mawes House 5 Castle Square London
 Unit 5 38 New Kent Road London

Apartment 1703 Raglan House 120 Elephant Road
 Apartment 1503 8 Walworth Road London
 Apartment 1006 8 Walworth Road London
 7 Wollaston Close Hampton Street London
 Stanhope House 116-118 Walworth Road London
 Flat 301 Highline Building 10 Steedman Street
 Apartment 1206 Raglan House 120 Elephant Road
 Apartment 702 Raglan House 120 Elephant Road
 Apartment 602 Raglan House 120 Elephant Road
 Apartment 502 Raglan House 120 Elephant Road
 1901 Portchester House 50 New Kent Road London

Re-consultation:

As above, and to those who had commented on the application in response to the first consultation.

Consultation responses received

Internal services

Archaeology
Community Infrastructure Levy Team
Local Economy Team
Ecology
Environmental Protection Team
Highways Development and Management
Section 106 Team
Flood Risk Management & Urban Drainage
Transport Policy
Urban Forester

Statutory and non-statutory organisations

Arqiva
Environment Agency
Greater London Authority
Historic England
Lambeth Council
London Fire & Emergency Planning Authority
London Underground
Natural England
Network Rail
Metropolitan Police Service (Designing Out Crime)
Transport for London
Thames Water
Walworth Society
Westminster Council

Neighbour and local groups:

35% Campaign
Guy's and St Thomas' NHS Foundation Trust
NHS South East London Clinical Commissioning Group
Southwark Law Centre

Apartment 41.01 Strata 8 Walworth
 Road London
 114b Friary Road London Se15 1px
 Apartment 602 Levy Building 37
 Heygate Street London
 41 Amery House Kinglake Street
 London
 2 Amelia Street London SE17 3PY
 100 Dickens House Doddington Grove
 Walworth London
 Flat 4, 55-57 Crewdson Road London
 SW9 0LH
 55 Delphini Apartments 10 St.
 Georges Circus London
 Flat 7 Beckhaven House London SE11
 4NL
 711 22 Amelia Street London Se17
 3bz
 8 Broadwall London SE1 9QE
 246 Olney Road London Se17 3hu
 89 Kennington Park Road London
 Se11 4jj
 59 Frome House Peckham Rye SE15
 3JF
 701 Tantallon House 130 Elephant
 Road London
 701 Tantallon house 130 Elephant
 road London
 Apartment 10, 1 Churchyard Row
 Elephant and Castle London
 21b chapter road London Se17 3es
 34 Heygate street London Se17 1FX
 88 Whampoa Drive # 01-865
 Singapore 320088
 15 St Thomas Walk #26-17 Singapore
 238143
 Flat 14 The Old Telephone Exchange
 20 Liverpool Grove London
 37 Alberta Street London SE17 3SF
 11 Brettell Street London Se172nz
 604, Hurlock Heights, 4 Deacon Street,
 London, SE17 1 GD London SE17 1GD
 97a Copleston Road Peckham
 SE154AH
 Denise Mulligan 6 Beatrice Road
 London
 13 Eastwood Green Eastwood Green
 Terrace Singapore
 12 Press Court 77 Marlborough Grove
 London
 407 Hurlock Heights, 4 Deacon Street
 London
 10b ulrwin street London SE5 0nf

61 Plover Way London SE167TS
 22 Mendip Court Avonley Road New
 Cross
 28 Sutherland Square London SE17
 3EQ
 59 Portland Street London SE17 2PG
 45 ILIFFE STREET LONDON SE17
 3LJ
 Apartment 2504 Raglan House 120
 Elephant Road London
 32 Denman Road Peckham SE15 5NP
 16 Windmill Row London SE11 5DW
 Flat 7, Dunli House 2 Tawny 3 London
 3 stockham court rodney road london
 90 Kennington Lane London SE11
 4XD
 2 Burwash House London SE1 3RW
 81a denmark hill london se5 8rs
 Flat 1105 19 St George Wharf London
 289 Grafton Road London NW5 4BJ
 Flat 19, 92 Webber Street London
 London
 90C Talfourd Road london SE15 5NZ
 245 Hollydale Road Nunhead London
 505 Octavia Apartments 7 Chatteris
 Way London
 83 Pope house Bermondsey SE16
 3NX
 1002 Barnard House London SE17
 1FX
 Flat 40 Sherston Court Newington
 Butts London
 2 Forsyth Gardens London UK SE17
 3NE
 404 Beck House London SE17 1GR
 407 Hurlock Heights 4 Deacon Street
 London
 83 Crampton street Flat 605 London
 2c Kings Grove London SE15 2NB
 32 Archdale House Cluny Estate
 London
 705 Weymouth Building 2 Deacon
 street London
 Flat 1 79 Balfour Street London
 Flat 507 83 Crampton Street Elephant
 & Castle
 Flat 408 83 Crampton Street London
 Apartment 104 3 New Lion Way
 London
 408 London SE17 3BA
 Middle Floor Flat 59 St Marys Road
 London
 Harbord Close London SE58AG

Flat 9, Block K, Peabody Estate
 Rodney Road London
 60 park lane Harefield Uxbridge
 3505 8 Walworth Road London
 190 Kennington park road London
 SE114BT
 63A Grosvenor Park London
 FLAT 19, 9 ANGEL LANE LONDON
 52 Ivanhoe Road London SE58DJ
 36 Grovelands close London SE5 8JN
 50 Cooper Close London London
 303 Tyler Court London Se17 1ax
 Flat 1, 7 Danson Mews London
 SE173FQ
 19 Tyers terrace Vauxhall London
 5a Christchurch House Montpelier
 Road Brighton
 33Casino Ave London SE249PQ
 13 St Giles Road London SE5 7RL
 506 Arum House 46 Rodney Road
 London
 1002 Barnard house 34 heygate street
 London
 23 Gladstone street London SE1 6EY
 2804 Hurlock Heights 4 Deacon Street
 London
 102 Beck House 3 New Lion Way
 London
 Apt 3708 8 walworth road London
 Se16el
 Cartwright house County street
 London SE1 6AN
 16 Harpers Lane Mancetter
 Warwickshire
 21 RYEDALE South London SE22
 0QW
 111 Caroline Gardens Asylum Road
 London
 Flat C 85 Balfour Street London
 Perronet hse Princess st Londin
 57 Elliotts Row LONDON SE11 4SZ
 Flat 14 20 Liverpool Grove London

 4 Deacon Street London SE17 1GD
 Apt 2903 8 Walworth Road London
 8 Cardine Mews Peckham/Old Kent
 Road London
 52 Dryden Court Renfrew Road
 London
 Apartment 2302 1 St Gabriel Walk
 London
 2804 Hurlock Heights 4 Deacon Street
 London

Flat 6 1 Danson Mews London
 87 Balfour Street London SE17 1PB
 154 Manor Place London Se173bg
 114 walworth road London Se17 1jl
 4 Deacon Street London SE17 1AQ
 501 Octavia apartments London. SE17
 1GX
 East Ferry Road London E14 9YF
 44 44 ASHCROFT CRESC sidcup
 12 Wordsworth Road Bermondsey Se1
 5tx
 55 Blandford street London W1U 7HW
 31 Lexham Gardens Flat 1 London
 South East London CCG - Head Office
 London
 Flat 803, Barnard House 34 Heygate
 Street London
 Flat 6 137 trafalgar street London
 University of the Arts London. St
 Georges Road London
 Flat 21 130 Webber Street London
 Flat 1007 Baldwin Point London SE17
 1FH
 8 Cardine Mews London SE15 1AY
 Flat 21 MyBaSE1 130 Webber Street
 Southwark
 105 Bramwell House Harper Road
 London
 203, beck house 3 new lion way
 London
 Apt 702, Octavia Apartments 7
 Chatteris Way London
 Flat 2, 46d Bird in Bush Rd Peckham
 SE15 6RW
 65 Monkton Street London
 Cromwell Avenue London W6 9LA
 46 Rodney Road London Se17 1fj
 83 empire square south London Se1
 4nf
 138 Amelia street London Se17 3ar
 37 Meadowbank London
 G6, 9 Steedman street Elephant and
 castle SE17 3AF
 708 8 Walworth Road London SE16EE
 83 Chatham Street London Se17 1pa
 92 Vanbrugh court, Wincott street
 London SE11 4nr
 44 Alberta St London SE17 3SD
 Apartment 710 8 Walworth Road
 London
 226 Hillingdon Street London SE17
 8 Walworth road London SE1 6EE
 Flat 33 The Paragon 43 Searles Road

LONDON

601 Arum House 46 Rodney Road
London
Flat 1 43 Searles Road London
47 Hampton Street London SE17 3AN
11 Goodwin Close London SE16 3TR
603 Walton Heights London SE17 1FZ
61 New Place Square London SE16
2HP
Apartment 1702, Walton Heights 143
Walworth Road London
Conquest Tower London SE1 8BZ
Flat 16 Press Court 77 Marlborough
Grove London
Apartment 1004 Barnard House, 34
Heygate Street London SE17 1FX
Apartment 2502 8 Walworth Road
London
Flat 1007 Baldwin Point 6 Sayer Street
London
14 Bodley way Heygate street London
74 Addison Road London Se25 4lp
2b Church Avenue Norwich NR2 2AQ
FLAT 206 BANKSIDE LOFTS London
46 Scawen Road London SE8 5AE
17 Ashmead Road London SE8 4DY
Apt 3708 8 walworth road London
Se16el
14 Dryden Court Renfrew Road
London
506 Barnard House 34 Heygate Street
London
102 Beck House 3 New Lion Way
London
43 phelp st London London
Apartment 403 Weymouth Building 2
Deacon Street London
69 Upland Road London SE22 0DB
Apartment 267 London Se1 6bx
Apartment 403 Weymouth Building 2
Deacon Street London
Flat 28 Jardin House Stead Street
LONDON
26 Bowater House Golden Lane Estate
London
72 Homestall Road London SE22 0SB
32 Gawber Street London, Tower
Hamlets London
88 Whampoa Drive #01-865 Singapore
320088
Flat 7, Winch House Stead St London
42 Granville Square London
2 Naylor Road London SE15 1BE

9 Dalemmain House, Union Grove
London SW8 2QP
63A Grosvenor Park London
49 Sharsted Street London SE17 3TP
Apartment 1405 8 Walworth Road
London
103 Levy Building 37 Heygate St
London
16 Walcot House Dog Kennel Hill
London
117 Camberwell Rd London
306 Madison Apartments 5-27 Long
Lane London
Wallwood Road London e11
54 Tyers estate London Se1 3jg
Harling House 47-51 Great Suffolk
Street London
9 Dante Road London SE114RB
38 laurel apartments 1-42 townsend
street london
Long Lane London Se1
apartment 1402, Walton Heights
london se171fz
266 Friern Road LONDON SE22 0BB
1 St Gabriel Walk London SE1 6fb
Flat 1 Alexandra Court 45A Urlwin
Street London SE5 0AB
150A kennington lane london se114uz
82 Marie Curie, Sceaux Gardens
London
Flat 2, 3 Angel Lane London SE17
3FD
28 Trinity Church Square London SE1
4HY
32 Neckinger Estate Enid Street
London
24 Cadiz Street London SE17 2TJ
60 Carter St London SE17 3EW
12 Nunhead Grove London SE15 3LY
38 pullens buildings peacock street
london
21 Pallant House Tabard Street
London
22 26 Arch Street London
Apr 404 8 Walworth Road London
15 St Thomas Walk #26-17 Singapore
238143
24 Goddard House 3 George Mathers
Road London
75 Henshaw street London SE17 1PE
2 St Georges Buildings 37 St Georges
Road London
53 Ambergate Street London SE17

3RZ
 1 St. James's Park Croydon CR0 2UT
 Apartment 901 Barnard House, 34
 Heygate Street London SE171FX
 118 Lomond Grove LONDON
 Flat 16, Gilbert House Wyvil Road
 Vauxhall
 36a Redcliffe Square London SW10

9JY
 38 Camilla Road London SE16 3NL
 Apartment 804, Hurlock Heights, 4
 Deacon Street London SE17 1GD
 10 Abinger house Great Dover st
 London
 28 London SE85NX
 Apartment 503 9 Churchyard Row
 London
 38 Clyde Terrace London SE23 3EH
 Flat 504, Block C The Jam Factory
 London
 224 Amelia St London SE17 3AS
 20 Faunce Street London SE17 3TR
 13a Blythe Close London SE6 4UW
 6 Altima Court 33 E Dulwich Rd
 London
 43a Browning Street London SE17
 1LU
 56 Moorland Road London SW9 8UB
 43A Browning street London SE17
 1LU
 5 Halsmere Road London SE5 9LN
 Apartment 2008 8 Walworth Road
 London
 91 Knatchbull Road London Se5 9qu
 Apartment 1007, 4 Deacon street
 Hurlock Heights London
 55 Princes Court London SE16 7TD
 5 Huguenot Square London SE15 3NN
 6c Pomfret Road London SE5 9DJ
 122 Samuel Jones Court London SE15
 6FN
 2704 Hurlock Heights 4 Deacon Street
 LONDON
 Flat 20 Breton House London SE1 3EF
 53 Tomkyns House, Distin St London
 SE116UN
 7 Albany Mews Albany road London
 111 Addiscombe Court Road Croydon
 Croydon
 8 Walworth Road, apartment 904
 London SE16EE
 39 Buchan Road London SE15 3HQ
 Flat 12 London SW46AX

Flat 519 22 Ameilia Street London
 SE173BZ
 1 centaur street London SE1 7EG
 49 Sunray Avenue Dulwich London
 8 marlborough cls Hampton Street
 London
 9 Gilesmead 79 Camberwell Church St
 London
 8 Broadwall London SE1 9QE
 Apartment 702 Weymouth building
 London SE171GB
 Levy building London Se17 1fu
 16 Saint Matthew's House Phelp
 Street London
 85 Pilton Place Walworth London
 Apartment 101 Beck House 3 New
 Lion Way London
 Flat 21 91 Newington causeway
 London
 FLAT 1-2 247 CAMBERWELL NEW
 ROAD LONDON
 59 Stephenson House Bath Terrace
 LONDON
 Flat 11 5 Angel Lane London
 19 Eliza Newcomen hse London Se1
 1yz
 17 Sycamore Court Royal Oak Yard
 London
 flat 13 kenley house 37 ashburton road
 london
 Flat 45 Clarson House, 81 Camberwell
 New Road London SE5 0AE
 16B Handforth Road London SW9 0LP
 1404 8 Walworth Road London
 16 Webber Row London SE1 8QP
 119 Newington Causeway London Se1
 6bb
 Apartment 2504, Hurlock Heights 4
 Deacon Street London
 35 Elsted Street London SE17 1QG
 Flat 408 London SE17 3BA
 Apartment 402 8 walworth road
 London
 1 Rutherford Lodge 7 Brockham Street
 London
 Block A506 27 Green Walk London
 201 Levy Building 37 Heygate Street
 London
 apartment 2008 8 Walworth Road
 London
 24 Ewart Court Newcastle upon Tyne
 NE3 2LB
 17 Hungerford Road Islington London

177 Cator Street Ground floor flat
London
27 Jurston Court Gerridge street
London
81 Fenwick Place London SW99NL
Flat D 75 Grove Park Camberwell
WSP House 70 Chancery Lane
London
2701 Hurlock heights, 4 deacon street
London SE171GF
Forest of Friends Possum Creek 2479
124 Oglander Road London Se154db
Flat 27 5 danson mews Wakefield
Flat 11 Harford House London
SE50YN
Flat 2 Tower Mill Rd London
62 iliffe street London Se17 3ll
10 bramwell house Harper road
London SE1 6RL
32 NORTHBOURNE RD, FLAT 5
London SW4 7DJ
Barnard house London Se17 1fx
25 dragon road London Se156qx
Flat 17 9 Angel Lane LONDON Se17
3fg
Flat 8 Parker Building Freda Street
London
22 winch house Stead street London
4 Darwin Street London se17 1hb
8 reynolds drive London HA85PZ
24 Northchurch Dawes Street London
Block I Flat 14 Peabody Bdgs
Southwark Street London
4 Deacon street, Hurlock Heights, flat
1102 London SE171GD
Flat 403, Stock House 29 Wansey
Street London
85 Marcia Rd London SE15XF
1 balmoral court 40 Merrow street
London
32 SALTWOOD GROVE MERROW
STREET LONDON
3 new lion way Flat 405 becks house
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3 Kennington Park House Kennington
Park Place London
50 Pakeman House London Se10bh
31 Wooler St London SE17 2ED
Flat 5, Walker House 11 Odessa
Street London
3 Rutherford Lodge 7 Brockham Street
London
Peabody Estate, Southwark Street, Flat

11, Block I, London Flat 11, Block I
LONDON
Flat 11 Block i Peabody Estate London
Flat 5, 115 Brandon Street London
SE17 1AL
Collingwood House 3 Cottage Green
Camberwell
16 chandler way london SE15 6DY
85 Leonard Court London SE15 2BP
12 Henshaw Street Walworth London
51 Meyer Road #02-04 Singapore
437874
9 Riviera Drive #08-05 Singapore
467202
Apt 304, 8 Walworth Rd London SE1
6EE
27 De Laune Street London SE17 3UU
1003 Barnard House, 34 Heygate
Street London SE17 1FX
15 Evelyn Rd #33-01 Singapore
309311
Flat 710 22 Amelia Street London
70 Lorrimore Road London Se17 3lz
1007 Bladwin Point 6 Sayer Street
London
61 Grange Road #06-02 Singapore
249570
2 Forsyth Gardens London SE17 3NE
Flat 1105 Baldwin Point London SE17
1FH
Flat 14, Pullens Buildings Penton
Place London
128 Benhill Road Camberwell SE5 7LZ
3 St Pauls House 51A Sutherland
Square London
2203 Strata 8 Walworth Road London
8 Walworth Road Flat 1207 London
Flat 1003 8 Walworth Road London
11 Tisdall Place London SE17 1QQ
2 Kennington Lane Apartment 45
London
3 PEARLEC HOUSE WALWORTH
PLACE LONDON
Flat 19 5 Waleorde Road London
301 Henderson Apartments 58 Rodney
Road London
Flat 3806 8 Walworth Road London
121 Braemar Avenue London NW10
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Flat 32 Grenier Apartments Peckham
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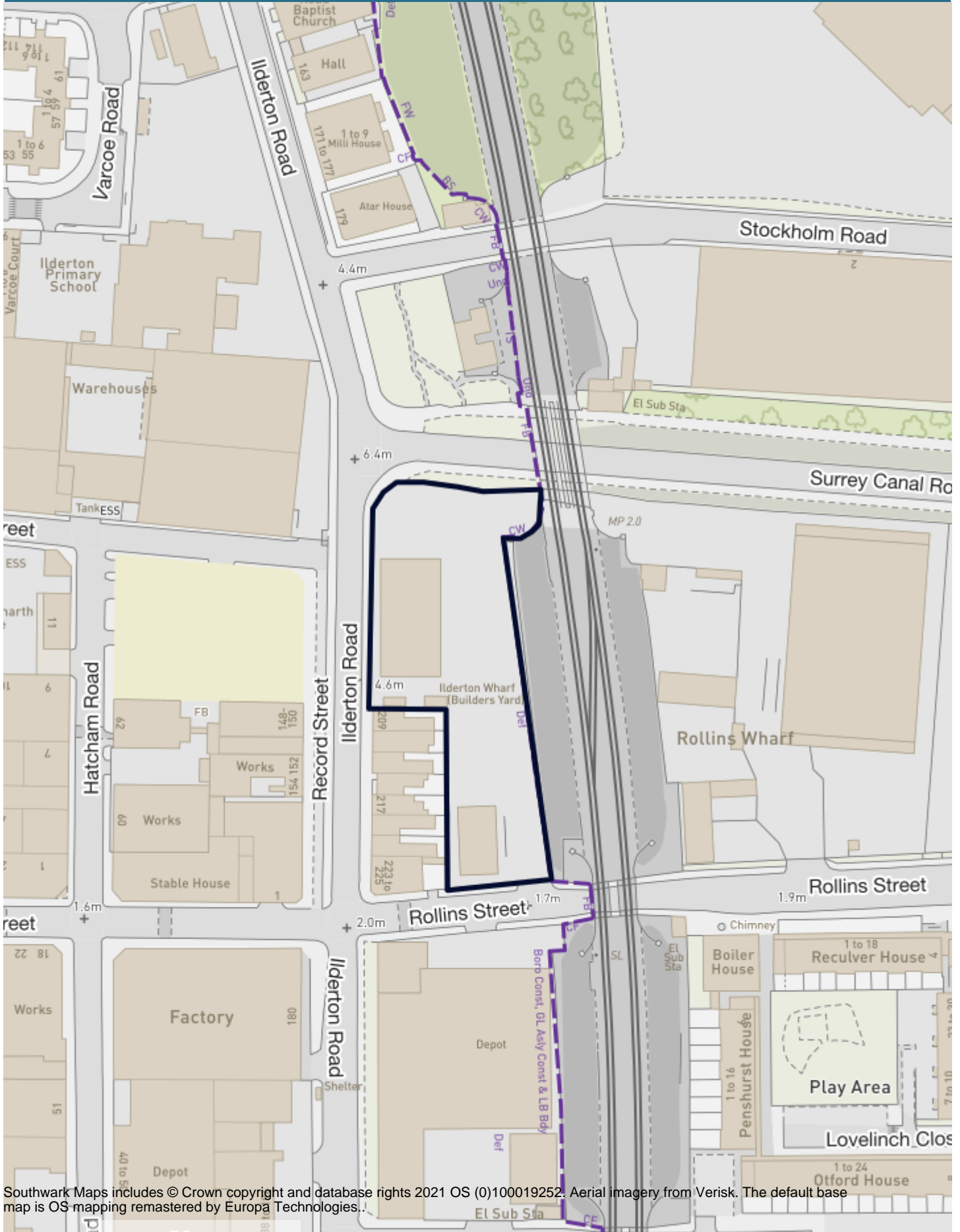
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 Flat 1 4 Ringstead Road London
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 1 Alice Street London SE1 4QZ
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 Aylesbury Road London
 5A Albany Mews London SE5 0DQ
 Rodney Road London SE17 1AS
 21b Pellatt Road London SE229JA
 Flat 14 Darwin Court Barlow Street
 London
 Flat 45 Dighton Court John Ruskin
 Street London SE5 0PR
 66-68 Camberwell road London
 SE50EG
 7 Denny the London SE114UY
 Flat 903 Baldwin Point 6 Sayer Street
 London
 3 New Lion Way 706 Beck House
 London
 Apartment 303 London SE1 6EB
 11B Sears Street London SE5 7JL
 45a urlwin Street London se50ab
 Whateley Road East Dulwich SE22
 9DD
 Flat 42, squire house 290 Camberwell
 road London
 13 Exon Street London SE17 2JW
 18 Market Place Blue Anchor Lane
 London
 23 Danecroft Road London SE24 9PA
 807 Printworks 22 Amelia St London
 29 Penny Black Court 2D Carlton
 Grove London
 2904 1 saint Gabriel Walk London
 154 manor Place London Se173bg
 Flat 401E, Sidney Webb House 159
 Great Dover Street London
 62 Press Court 77 Marlborough Grove
 London
 87 Canterbury house 6 Sydenham
 Road London
 17 Southborough house Kinglake
 estate London
 Crampton Street London SE17 3BT

5 Hatters court 99 Redcross Way
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1, 26 Ferndale rd London Sw47sf
39 Eastlake rd Londkn
41b Peckham Hill Street London SE15
6BJ
Apartment 902 9 Churchyard Row
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Apartment 3201 8 Walworth Road
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62 Iliffe Street London SE17 3LL
65 Metro Central Heights 119
Newington Causeway London
47 Hubert Grove London SW9 9PA
157 Elmington Road Flat C
Camberwell
Apartment 203 Beck House 3 New
Lion Way London
107 Roffo Court Boundary Lane
London
Lacey Green High Wycombe HP14
4UE
Apartment 3501 the strata 8 Walworth
road London
5 Falcon Point Hopton Street
BANKSIDE
20 Pearman Street London SE1 7RB
6 Courtenay Square London SE11
5PG
Flat 458 Metro Central Heights London
SE1 6DT
2 Cruden Place Coulsdon CR5 3FU
19 Peckham Grove London
1502 Baldwin Point 6 sayer Street
London
33 Langdale Close London SE17 3UF
177 Brook Dr. London SE11 4TG
58 Buckstone Apartments 140
Blackfriars Road London
29 Ladas Road West Norwood London
23 Ellis House Brandon Street London
Flat 5, Sycamore Court 58 Valmar
Road LONDON
103 Levy Building 37 Heygate Street
London
Flat 8 Block D Rodney Road Peabody
Estate, Rodney Road London
14 Courtenay Street Kennington
London
Flat 1, Bamatt House 221a Old Kent
Road London
13 mawdley house Webber row
London

Apartment 905 Hurlock Heights 4
Deacon Street
58 Wooler Street London
Flat B London SE5 7TG
11 Oswin Street Flat A LONDON
flat 19, 43 Searles road london se1 4yl
Apartment 6 109 Peckham High Street
Peckham
52 Arrol House Rockingham Street
London
G Baldwin & Co Ltd 171-173 Walworth
Road London
flat 13 rodney road peabody estate
london
Flat 4 Bateman House London
SE173PF
Apartment 1506 Raglan House London
56 Linnell Road London SE5 8NJ
6 curlew house Pelican estate London
Apartmentc1704 8 Walworth Road
London
flat 805, Hurlock Heights 4 Deacon
Street London
41 Alma Grove London SE1 5QB
Flat 10 Shaftesbury Court London
SE14JR
5 Marlborough Close London SE17
3AW
Flat 24, Bethersden House Kinglake
Estate London
24 Canterbury Place LONDON SE17
3AG
15 St Thomas Walk #26-17 Singapore
238143
604 One The Elephant 1 St Gabriel
Walk London SE1 6FA
11 steedman street London Se17 3af
Apartment 2903 9 Churchyard Row
London
PO Box 71 Road Town Tortola
Portland Street London SE17 2DT
403 Barnard House 34 Heygate Street
London
Flat 207, Levy Building 37 Heygate
Street London
51 Hassendean Road Blackheath
London
Denny Steeey London Se11 4ux
12 Wordsworth Road London Se1 5tx
34 Southey House Browning Street
London
Flat 19, 7 Danson Mews Walworth
London

20 Dekker House Elmington Estate
Camberwell
61 Chatham Street London SE17 1PA
142 Tanner Street London SE12HG
11 Steedman Street Flat 603 London
Basement Flat London SE24
Flat 3, Park House, Bassano Street,
East Dulwich East Dulwich SE22 8RY
12 Block H Rodney Road London
3 Angel Lane Flat 10 London
82 Marden Square LONDON SE16
2JA
20 Brook Drive Flat 2 London
Flat 2 79 Balfour Street London
69c Balfour St Ondon Se17 1pl
26 Chapter Road London SE173ET
Flat 45 Dighton Court John Ruskin
Street London
flat 4, 18 meadow row melbway house
London
57 Newman House St. George's Road
London
Flat 2 Twickenham Tw1 1ry
17 Brunlees house London Se1 6qf
1106 Hurlock Heights, 4 Deacon St
London SE17 1GD
Flat 412 9 Steedman Street London
St Alphege Clergy House Pocock St
London
Flat 705 Sir John Soane Apartments 20
Heygate Street London
28 Suffield House Berryfield Road
London
29 Ravensdon St Kennington London
88 Daniel's Road Nunhead London
26 Ann Moss Way London SE16 2TL
20 Springfield House London SE5 8JY
Flat 14 Ellington House Harper Road
London
40 Chandler Way Peckham London
2 Deacon Street, London, 103
Weymouth Building London SE17 1GB
Flat 1105 Baldwin Point 6 Sayer Street
London
89 Jalan Serina 39, Taman Johor Jaya
Johor Bahru, Malaysia
63 Ryedale London SE22 0QL
140 Cheyneys Ave Edgware,
Middlesex HA8 6SE
401 Henderson Apartments London
SE171FJ
258 Olney Road Kennington London
APARTMENT 2903 8 WALWORTH

ROAD LONDON
Flat 13 9 Angel Lane London
19 Crawford Rd London Se59NF
35 Nicholson House London SE17
1ED
23 Hunter House King James Street
London
Flat 8 Block D Peabody Estate,
Rodney Road London SE17 1BJ
Apartment 1911 8 Walworth Road
London
8 Walworth Road Elephant & Castle
London
29 Whites Grounds Estate Whites
Grounds London
London
Flat C 15 Chapel Market London N1
9EZ
Southwark Law Centre London
Flat 1003, Baldwin Point 6 Sayer
Street London



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20-Sep-2022

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Item No. 5.2	Classification: Open	Date: 4 October 2022	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 21/AP/4757 for: FULL PLANNING APPLICATION Address: ILBERTON WHARF, 1-7 ROLLINS STREET, LONDON SE15 1EP Proposal: Demolition of existing buildings and erection of a mixed use development comprising a building of part 9, 23 and 25 storeys above ground to provide a replacement builders merchants with associated office, trade counter sales area, showroom and external storage/racking, a commercial unit fronting Ilderton Road (Use Class E) 170 residential apartments (Use Class C3) and other associated infrastructure.		
Ward(s) or groups affected:	Old Kent Road		
From:	DIRECTOR OF PLANNING AND GROWTH		
Application Start Date	21/01/2022	Application Expiry Date	22/04/2022
Earliest Decision Date	21/03/2022		

RECOMMENDATIONS

1. That planning permission be granted, subject to conditions and referral to the Mayor of London, and the applicant entering into an appropriate legal agreement by no later than 4 April 2023.
2. In the event that the requirements of (1.) are not met by 4 April 2023 that the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 295 of this report.

EXECUTIVE SUMMARY

3. The proposals involve the demolition of the existing Jewson builders' merchants and the construction of a building of two conjoined blocks to provide a mixed-use development incorporating a new facility for Jewson, as well as new homes, amenity spaces and improvements to the public realm.

4. The replacement builders' merchants has been designed by Jewson to meet their changing operational requirements. Compared to the existing facility, a larger double-height covered yard is proposed (including a mezzanine office area), with a smaller external yard to make more efficient use of the site. The space has also been designed to be flexible enough to accommodate a variety of industrial occupiers in the future should Jewson decide to vacate the site.
5. The proposals will provide 61 affordable homes and 109 market homes. The overall quantum of affordable housing would be 40.3% by habitable room (including 25.3% social rent) which exceeds policy requirements.
6. The quality of the proposed residential accommodation is considered to be good, meeting or exceeding the minimum space standards and providing 58.24% dual aspect accommodation. The proposal also provides a range of housing choices from one to four-bedroom properties, including 20.6% family homes (including 14 four-bedroom homes within the social rent), and 10.5% wheelchair housing by habitable room.
7. All residential units have access to large private amenity spaces in the form of balconies or winter gardens. The scheme also benefits from two communal amenity spaces (which comfortably accommodates all children's play space requirements) which are accessible to all residents within the development. The scheme also provides additional public realm with planting to allow for a safer and more attractive pedestrian environment around the site.
8. The scheme will be car free other than for a number of disabled parking spaces, an on-site residential loading bay, and a reduced number of retained spaces for Jewson staff and customers, with electric vehicle charging points provided throughout. The proposals also provide cycle parking in compliance with policy.
9. The proposals will achieve 70% on-site carbon emissions, with the deficit being captured by way of a financial contribution. The proposal involves the loss of four trees (two Category B and two Category C trees), albeit 21 new trees with greater variety, as well as physical and visual value are proposed, with conditions to secure adequate replacement and protection measures.
10. The application has resulted in one public objection. The key issue raised by the objector related to the development of more homes in the area in general terms.
11. The proposal is strongly supported by officers based on the re-provision of the existing Jewson facility to a higher specification, the high level of affordable housing proposed, as well as the excellent quality of accommodation, provision of the additional and enhanced public realm, and the overall design standards proposed. It is on this basis that the development is considered to be in conformity with the development plan when read as a whole (see full list of policies in Appendix 2 of this report) and is recommended for approval, subject to conditions and the completion of a suitable legal agreement.

Housing

12.

	Block A		Block B				Total		
	Social Rent		Intermediate		Private				
	Units	HR	Units	HR	Units	HR	Units	HR	%
1-Bed	5	10	8	16	40	80	53	106	31.2%
2-Bed	16	48	12	36	54	162	82	246	48.2%
3-Bed	0	0	6	24	15	60	21	84	12.4%
4-Bed	14	70	0	0	0	0	14	70	8.2%
	35	128	26	76	109	302	170	506	100%
Affordable Housing (By habitable room)	40.3% overall								

13. Non-residential

	Existing sqm	Proposed sqm
Internal GIA (<i>sui generis</i>)	657.7	890.6 sqm
External Yard GEA (<i>sui generis</i>)	2478.9	1059.1 sqm
Commercial GIA (E)	-	97.3 sqm

14. Amenity and Child Play Space

	Required sqm	Proposed sqm
Private Amenity Space	1,700 sqm	1,603.4 sqm
Communal Amenity Space	50 sqm	193 sqm
Child Play Space	757.3 sqm	757.3 sqm

15. Environmental

CO2 savings beyond Part L Bldg. Regs.	66%
Trees lost	4 (Cat B/C)
Trees gained	21

	Existing	Proposed	Change +/-
Urban Greening Factor Score	Negligible	0.43	+ 0.43
Surface Water Run Off Rate	12.3 l/s	1.5 l/s	- 10.8 l/s
Green/Brown Roofs	0	491.38 sqm	+ 491.38 sqm
EVCPS (on site)	0	6	+ 6
Residential Cycle Parking Spaces	0	322 long-stay 6 short-stay	+ 328
Commercial Cycle Parking	0	8 long-stay 4 short-stay	+ 12
Commercial Car Parking	16	8	-8

16. CIL and S106 contributions

SCIL (estimated)	£5,334,253.69 (Pre-Relief)
MCIL (estimated)	£3,283,173.16
S106	Approximately £1,014,303m

BACKGROUND INFORMATION**Site location and description**

17. The subject site is located at the junction along Ilderton Road, Surrey Canal Road and Rollins Street, and abuts the railway line connecting London Bridge to the southern

areas of London. The existing site is occupied by the builders' merchants, Jewson. It comprises a double-height shed, single-storey sales unit and an external working yard. Some parts of the site front onto Ilderton Road, mainly the northwest section, with the remainder of the site tucked in behind one of the last remaining terraced rows along Ilderton Road.

18. There is a slight change in natural ground level when moving from south to north past or through the site. At the north-east corner of the site on the Surrey Canal Road elevation there is a change in natural ground level as the highway goes under the railway viaduct and into the council boundaries of neighbouring Lewisham Borough.
19. The existing site is accessed from the south via a gate on Rollins Street. This is the only point of access into the site for both vehicles and pedestrians. All other site boundaries are either fenced or have brick walls to the perimeter. This creates a very poor relationship with Ilderton Road and Surrey Canal Road. To the north of the site is a recently opened pocket park, Pat Hickson Gardens, which marks the end of the east-west cycle path that travels along Surrey Canal Road.
20. To the south of the subject site is the former Leathams building which received planning permission for significant redevelopment of the site under reference 19/AP/1773. This proposal is currently in its beginning stages of development, and the scheme is similar in height to this application, and also provides residential above industrial uses on lower ground floors of the scheme.
21. The subject site is located within Sub Area 4 (Hatcham, Ilderton and Old Kent Road (South) and specifically within Site Allocation OKR 16) of the Old Kent Road Area Action Plan (OKR AAP). The site is designated as a Locally Significant Industrial Site (LSIS) as per Southwark's current Proposals Map and as a Strategic Industrial Location (SIL) as per the adopted London Plan 2021.
22. The site is within an Urban Density Zone and an Air Quality Management Area. The site is located in Flood Zone 3 as identified by the Environment Agency. Additionally, the site is designated as being within the North Southwark and Roman Roads' Tier 1 Archaeological Priority Area. The site is not within a Conservation Area, nor are there any listed buildings on or within close proximity to the site.
23. Transport for London's (TfL) Public Transport Accessibility Level (PTAL) provides a score of 1-6b to rate areas within London and their accessibility to public transport options. A score of 1 represents the lowest accessibility with 6b being the best locations of accessibility to public transport. The subject site is rated as 2 on the PTAL system indicating poor accessibility to public transport. However, South Bermondsey railway station is approximately 600m north of the site (where there are 15-minute frequency services to London Bridge), while the P12 bus service which runs along Ilderton Road provides service to Surrey Quays.

Image: Site plan



Details of proposal

24. Planning permission is sought for the demolition of existing buildings and erection of a mixed use development comprising a building of part 9, 23 and 25 storeys above ground to provide a replacement builders merchants with associated office, trade counter sales area, showroom and external storage/racking, a commercial unit fronting Ilderton Road (Use Class E), 170 residential apartments (Use Class C3), and other associated infrastructure.
25. As part of the comprehensive redevelopment of the site, the existing occupier, Jewson, will remain on site. The replacement builders' merchant's space has been specifically designed by Jewson to meet their own unique and changing operational requirements. Compared to the existing building on site, a larger double-height covered yard is proposed (including a mezzanine office/sales area) with a smaller external yard to make more efficient use of the site. The space has also been designed to be flexible enough to accommodate a variety of industrial occupiers in the future should Jewson decide to leave the site.

26. During the construction phase of the development, Jewson will maintain a presence in the southern half of the site through the temporary retention of the sales building whilst the predominant section of development at the northern section of the site is completed. The replacement builders' merchants will be supported by a total of eight parking spaces within the external yard (including one accessible car parking bay) similar to the existing arrangement; alongside 12 cycle parking spaces (eight long-stay spaces in a shelter within the external yard, and four short-stay spaces on Ilderton Road).
27. Children's playspace within the scheme is to be located at first floor podium level and on the eighth floor terrace, and comprises of 757.3sqm. The playspace will provide a variety of informal and imaginative play areas throughout the podium and terrace levels. Communal amenity is proposed on both the first floor podium, and the eighth floor terrace, amounting to 193sqm. The locations of the amenity spaces at the south and southwest of the building envelope enables these areas to maximise natural daylight and sunlight into the amenity spaces.
28. Cycle Parking will be provided in accordance with the London Plan and New Southwark Plan requirements. 322 secure cycle parking spaces are proposed for future residents of the development, located at lower ground floor, and upper ground floor. In addition to this, 6 visitor parking spaces are to be located near to the residential entrance to Block B on the Surrey Canal Road frontage. The proposed development is to be car-free and occupants of the development who are Blue Badge holders would be eligible for a Residents Parking Permit.
29. Refuse and recycling facilities will be provided at lower ground floor level with capacity for ten 1100L Eurobins consisting of six refuse bins, and four recycling bins for Block A. The refuse arrangement for Block B consists of twenty five 1100L Eurobins comprising of fifteen for general waste and ten for recycling purposes.
30. 170 residential units are proposed comprising of a mix of 53 one bedroom units, 82 two bedroom units, 21 three bedroom units, and 14 four bedroom units (Use Class C3). There are no north facing single aspect units within the scheme, with circa 60% of units being dual aspect, including all family sized units. Residents will access the units from an entrance lobby for each block from Surrey Canal Road. Two lifts are provided for Block A residents, and three lifts are provided for Block B residents to ensure that the building continues to be fully accessible in the event of one lift breaking. Additionally, one staircase for each block is centrally located on the lower ground floor level to provide access to the upper floors.
31. The development proposes 40.3% affordable housing by habitable room comprising of 25.3% social rent, and 15% intermediate. All four bedroom homes are provided in the social rent provision within the scheme. In total, 35 units are proposed for social rent, and 26 units are proposed for the intermediate affordable tenure. This amounts to 61 of the units being offered as affordable housing.

Table: Proposed land uses

Land Use	Use Class	GIA
Residential	C3	11,782.70sqm
Commercial	<i>Sui generis</i>	890.6sqm
	E	97.3sqm

Revisions and amendments

32. Whilst no design or alterations to the total number of residential units has occurred during the lifespan of this application, additional information regarding some areas of assessment was submitted. The documents were submitted in light of comments received from consultee comments. In acknowledging the further documents, and the nature of the information received re-consultation of the scheme was not required.
33. The documents of additional information submitted during the course of this application were as follows:
- Landscape Strategy and Urban Greening Factor
 - Flood Risk Assessment
 - Whole Life-Cycle Carbon Assessment
 - Circular Economy Statement
 - Energy Statement
 - Additional noise and vibration impact assessment information
 - Additional dynamic overheating information
 - Additional bird and bat box locations information
 - Additional cycle storage information
 - Rollins Street Road Safety Audit

Consultation responses from members of the public

34. One representation has been received raising an objection to the proposed development. The nature of the objection is summarised in the table below.

Table: Public comments on the development

Objection	Officer Response
<u>Addition of homes and impact on surrounding area</u> : Concern raised over development of more homes in the area in general terms	The development site has been identified within the OKR AAP, the Southwark Plan, and London Plan as a site allocation and an opportunity of where industrial/commercial uses can co-exist with residential uses. The proposed development complies with the aims and objectives of each plan mentioned above and also will provide much needed housing stock within the borough with a high level of affordable housing.

Consultation response from London Borough of Lewisham

35. Due to the eastern edge of the subject site abutting the borough boundary line with Lewisham, the authority was consulted on the application. Lewisham expressed concern and lodged a formal objection to the development. The table below summarises the nature of the objection from Lewisham.

Table: London Borough of Lewisham comments on the development

Objection	Officer Response
<p><u>Vehicular access for servicing from Surrey Canal Road:</u> The proposed new vehicular access to Surrey Canal Road has the potential to have a detrimental impact on the operation of these additional bus services along Surrey Canal Road, with associated implications for timetabling and frequency of service. Its proximity to the junction with Ilderton Road is likely to result in frequent obstruction of traffic movement on Surrey Canal Road and have associated implications for the effective operation of the Surrey Canal Road / Ilderton Road.</p>	<p>A Stage 1 Safety Audit was submitted along with the application that recommends that the service area from Surrey Canal Road is accessed as a left turn in and left turn out servicing arrangement with banned right turns. As part of the recommendations of the Safety audit, the Ilderton Road/Surrey Canal Road junction will be upgraded to a Toucan intersection that will improve the functioning of the intersection. In addition, the developer must promote the relevant traffic order to impose a left turn in / left turn out movement and banned right turns.</p>
<p><u>Impacts on Surrey Canal Road/Ilderton Road junction:</u> In the context of the pedestrian and cycle improvement works that will be required to the Surrey Canal Road / Ilderton Road junction to safely accommodate bus turning movements, it is not clear that this has been taken into account in the design of the proposed development. We would expect that a proportionate financial contribution should be secured from any development on this site towards improvements to the Surrey Canal Road / Ilderton Road junction.</p>	<p>As stated above, the Surrey Canal Road/Ilderton Road will be upgraded to a Toucan intersection in light of the recommendations informed from the submitted Road Safety Audit. The improvements to this intersection will have capacity to adequately accommodate cycle and pedestrian improvements. The development has been setback from both Ilderton Road and Surrey Canal Road to enable a more comfortable pedestrian and cycle experience when moving past the site. It is also acknowledged that the upgraded intersection will assist in Transport for London's ambitions to potentially increase bus services along Surrey Canal Road.</p>

KEY ISSUES FOR CONSIDERATION

Summary of main issues

36. The main issues to be considered in respect of this application are:
- Equalities Impact Assessment
 - Principle of the proposed development in terms of land use;
 - Opportunity Area;
 - Industrial land;
 - Affordable workspace;
 - Old Kent Road Phasing;
 - Provision of housing;
 - Affordable housing;
 - Development viability;
 - Design issues including site layout, tall buildings and heritage considerations;
 - Landscaping, trees, biodiversity, and urban greening;
 - Design Review Panel;
 - Housing mix;
 - Density;
 - Quality of residential accommodation;
 - Designing out crime;
 - Private, communal amenity space, children's playspace & public open space;
 - Impact of proposed development on amenity of adjoining neighbours and surrounding area;
 - Transport;
 - Archaeology;
 - Refuse and waste;
 - Wind and microclimate;
 - Fire strategy;
 - Flood risk and water resources;
 - Ground contamination;
 - Air quality and noise;
 - Energy, sustainability and digital connectivity;
 - Whole Life-Cycle and Circular Economy;
 - Health Impact Assessment;
 - Planning obligations; and
 - Mayoral and borough community infrastructure levy

Legal context

37. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2021, the Southwark Plan 2022 and the draft Old Kent Road Area Action Plan 2020.

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

EQUALITIES

39. The Equality Act (2010) provides protection from discrimination for the following protected characteristics: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership. Section 149 of the Equality Act 2010 places the Local Planning Authority under a legal duty to have due regard to the advancement of equality in the exercise of its powers, including planning powers. Officers have taken this into account in the assessment of this application and Members must be mindful of this duty, inter alia, when determining all planning applications. In particular Members must pay due regard to the need to:
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act; and
 - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
 - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
40. As set out in the Essential Guide to the Public Sector Equality Duty (2014), “the duty is on the decision maker personally in terms of what he or she knew and took into account. A decision maker cannot be assumed to know what was in the minds of his or her officials giving advice on the decision”. A public authority must have sufficient evidence in which to base consideration of the impact of a decision.
41. The Strategic Housing Market Assessment (SHMA) prepared on behalf of a number of South East London boroughs states that Southwark, together with Lewisham, has the most ethnically mixed population in the South East London sub-region. Compared to the population at large a very high proportion of Black households (70%) are housed in the social/affordable rented sector. These groups could therefore stand to benefit from the proposed affordable housing, which would include social rented units. The provision of communal amenity spaces to be shared by different tenures would also contribute to the potential for increased social cohesion. This is a positive aspect of the scheme.
42. There are a large number of existing black and ethnic minority businesses in the local area, which would not be directly affected by the proposed development. However, the impact of the development would increase footfall in the local area and could create a number of opportunities for these existing businesses.

Other equality impacts

43. Travellers are a group with protected characteristics. The closest Travellers site to the proposed development is located close to the junction with Rotherhithe New Road and Ilderton Road. The distance between the Travellers site and the subject site is circa

390 metres to north. Given the sufficient separation distance it is therefore considered that no adverse impacts would occur to this group.

44. The proposed development would also generate additional opportunities for local employment. The proposed development would deliver increase the amount of commercial floorspace from 657.7sqm to 987.9sqm. The new floorspace will provide more efficient layout for Jewson to operate in and is considered to be a significantly positive aspect of the development proposal.

Conclusion on equality impacts

45. The proposed development would not result in any adverse equality impacts in relation to the protected characteristics of religion or belief and race as a result of the proposed development incorporating a mixed use scheme of residential units in C3 Use Class above ground and ground floor/mezzanine level commercial units. Notwithstanding that the development would result in a significant change to the site, Officers are satisfied that equality implications have been carefully considered throughout the planning process and that Members have sufficient information available to them to have due regard to the equality impacts of the proposal as required by Section 149 of the Equality Act 2010 in determining whether planning permission should be granted.

Environmental impact assessment

46. A Screening Opinion was submitted under Southwark planning reference 21/AP/1146 to determine whether an Environmental Impact Assessment (EIA) would be required for this development. The Screen Opinion demonstrated that an EIA for this proposal would not be required.

PRINCIPLE OF DEVELOPMENT IN TERMS OF LAND USE

Opportunity area

47. The site is located within the Old Kent Road Opportunity Area (close to the Central Activities Zone) where the London Plan recognises the potential for “significant residential and employment growth” to be realised through a suitable planning framework that optimises development in conjunction with improvements to public transport accessibility
48. The Old Kent Road Area Vision of the Southwark Plan 2022 sets out the overall vision for the Old Kent Road. The policy says development should:
- Deliver direct benefits to the existing community including new and improved homes including new council homes, schools, parks, leisure and health centres, and the creation of jobs;
 - Promote car free development and support the Bakerloo Line extension, electric buses, taxis, commercial vehicles and cycling which will help to tackle air and noise pollution;
 - Help foster a community in which old and young can flourish;

- Build new homes that come in a range of types from terraced houses to apartments with a high design quality including generous room sizes, high ceilings and big windows to ensure people have space to think and to rest;
 - Link existing open spaces like Burgess Park to each other and new park spaces;
 - Demonstrate excellent standards of environmental sustainability including pioneering new district heating networks to reduce carbon emissions, measures to tackle poor air quality and sustainable urban drainage systems to reduce flood risk.
49. The Old Kent Road Area Vision also states that the Old Kent Road Area Action Plan (OKR AAP) will set out the physical framework that will enable the community to realise its potential. The council is in the process of preparing this Area Action Plan for Old Kent Road which proposes significant transformation of the Old Kent Road area over the next 20 years, including the extension of the Bakerloo Line with new stations along the Old Kent Road towards New Cross and Lewisham. A further preferred option of the Old Kent Road AAP (Regulation 18) was published in December 2020. As the document is still in draft form, it can only be attributed limited weight.

Industrial land

50. The application site is identified within the Southwark Plan 2022 (Policy P29) as a Locally Significant Industrial Site (LSIS). The objective of this designation is for LSIS sites to be intensified for residential and industrial co-location. In addition, the site is also within the boundaries of Site Allocation NSP70 '*Hatcham Road and Penarth Street and Ilderton Road*' of the Southwark Plan 2022. NSP70 requires developments to:
- Provide new homes (C3); and
 - Provide at least the amount of employment floorspace currently on the site (E(g), B class); and
 - Provide industrial uses (E(g)(iii) or B8 use class); and
 - Provide public open space - 1,990m²
51. The redevelopment of the site would accommodate 170 residential units, an increase on the existing provision of employment floorspace on site, retain the existing occupier on site, and provides 245sqm of public open space. The provision of open space would contribute towards the overall goal of 1,990sqm of public open space for the NSP70 allocation.
52. Policies E4 and E7 of the London Plan support the intensification and improvement of industrial uses on existing employment sites in order to ensure a sufficient supply of industrial capacity across London. Whilst not an "industrial" use per se, the proposed builders' merchants is a re-provision of an existing use on-site that supports other industrial activities.
53. The Old Kent Road was designated as an Opportunity Area through the previous iteration of the London Plan, with an indicative capacity of 1,000 new jobs and a minimum of 2,500 new homes. However, this has been increased to an indicative

capacity of 12,000 homes in the New London Plan (2021). The London Plan notes that the emerging OKR AAP should “*set out how industrial land can be intensified and provide space for businesses that need to relocate from any SIL identified for release. Areas that are released from SIL should seek to co-locate housing with industrial uses, or a wider range of commercial uses*”.

54. Furthermore, the draft OKR AAP sets targets of 20,000 new homes and 10,000 new jobs, to be supported by new infrastructure, including parks and schools. It proposes the release of a substantial part of the Strategic and local Preferred Industrial Location designation to allow for the creation of mixed use neighbourhoods where new and existing businesses would co-exist with new homes.
55. Paragraph 141(a) of the NPPF promotes making effective use of underutilised land, especially where this would help meet an identified need for housing. This has been incorporated into adopted policy as set out in Policy GG2 of the London Plan which seeks to prioritise the development of Opportunity Areas and sites which are well-connected by existing or planned Tube and rail stations and small sites. The application site is located within the Old Kent Road Opportunity Area. In locations such as this, both London Plan and Southwark Plan policies strive for higher density, high quality mixed use developments which assist in addressing the need for new homes and ranges of employment opportunities.
56. In the draft OKR AAP, the site is identified as falling within Sub Area 4 and Proposal Site OKR16. The AAP reiterates the purpose for LSIS sites to incorporate new homes typologies into developments to co-exist along with industrial uses on site. This is illustrated in the typologies map on the following page of this report.
57. The existing use on site is not considered to maximise the potential of this Opportunity Area Proposal Site. The proposed re-development of the site would introduce a mixed use building comprising of the retention of the Jewson Builders’ Merchants on site on the ground and mezzanine floor levels, and C3 residential Use Class to the upper floors. It is anticipated that the scheme would deliver major regeneration benefits that are further discussed in the proceeding parts of this report.

Image: Sub Area 4 - OKR16 with subject site outlined in red



Image: Typologies map of OKR16 – Subject site outlined in red



Employment and affordable workspace

Employment re-provision

58. Compared to the existing facility, a larger double-height covered yard is proposed (including a mezzanine office/sales area) with a smaller external yard to make more efficient use of the site. Overall, the proposed development provides an uplift in employment floorspace and re-provides Jewson with a modern facility that is fit for purpose. A small commercial unit is also provided fronting Ilderton Road (Use Class

E) that would be occupied by Jewson as a sales room. The proposals would result in an increase on the 9 existing full time employed (FTE) jobs with a predicted 15 FTE jobs. The council's Local Economy Team (LET) have reviewed the scheme and support the proposal. Triggers for employment obligations have been recommended by LET and are to be secured in the S106 Agreement.

Image: Lower ground floor layout

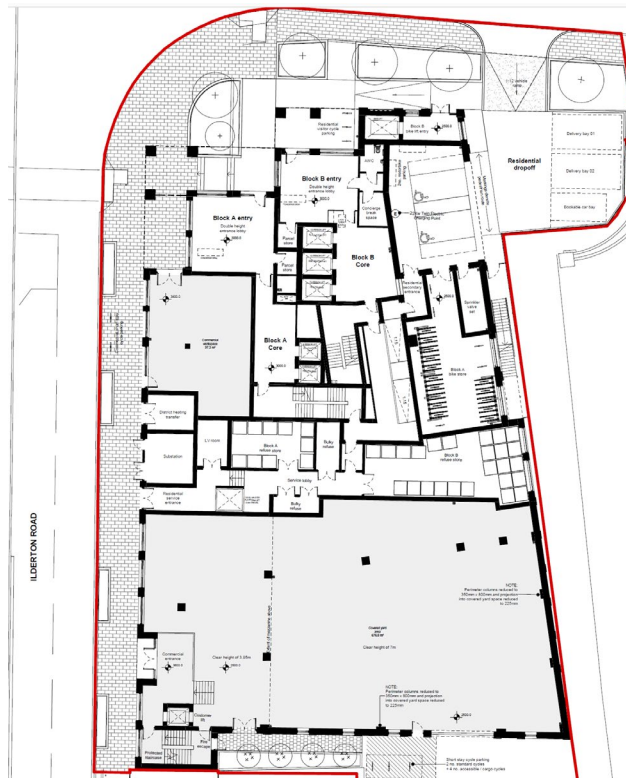
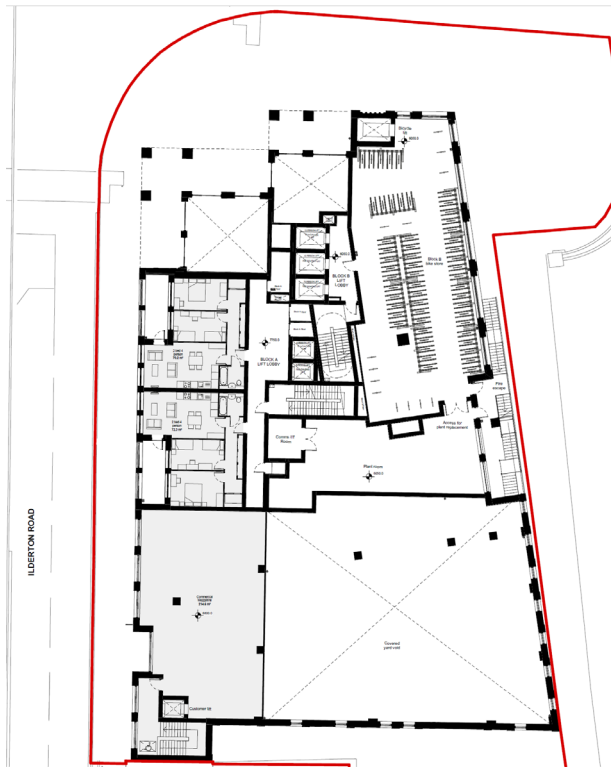


Image: Upper ground floor layout



Affordable workspace

59. Policy P31 of the Southwark Plan requires developments proposing 500sqm GIA or more employment floorspace to provide 10% of the proposed gross employment floorspace as affordable workspace on site at discount market rents. In this instance; however, the replacement builders' merchants space has been specifically designed by Jewson to meet their own unique and changing operational requirements, and no affordable workspace is proposed on site. Jewson has a strong presence within Southwark and employs many people, and it is therefore considered in this instance, that there is no in-principle objection to no affordable workspace being provided as part of this redevelopment.
60. It is acknowledged that there is a 97.3sqm commercial unit on the ground floor, and it is the intention of Jewson to use this unit for their operational needs. In addition, the commercial floorspace has been designed to be flexible enough to accommodate a variety of industrial occupiers in the future should that be required in the event Jewson vacate the site. Given this potential, a mechanism is to be included in the S106 Agreement that should Jewson not occupy the redevelopment, or if Jewson vacate the premises in the future, that the 97.3sqm unit is occupied by an affordable workspace business. This would amount to 10.92% of the floorspace within the development.

Provision of housing, including affordable housing

61. The development would provide 61 affordable units that comprises of 35 social rented units, and 26 intermediate homes. This equates to a total of 40.3% affordable housing by habitable rooms. The provision of affordable housing proposed within the scheme is a significantly positive aspect of the scheme. Additionally, the proposed social rent homes would be provided at social rent levels.

Old Kent Road Phasing

62. The Greater London Authority (GLA) and Transport for London (TfL) officers have worked closely with Southwark Council officers to agree the broad geography and phasing of development in the area covered by the OKR AAP, to help provide certainty to communities, local businesses and developers in advance of the Bakerloo Line Extension (BLE) and a clear timetable for its delivery. This has resulted in broad agreement between the GLA, TfL and Southwark Council on the scale and geography of the area's new town centres, where industrial uses will be retained, replaced and intensified, and how housing delivery will be phased in advance of the BLE. Broad alignment and the location of potential tube stations has also been agreed between Southwark Council and TfL and formal safeguarding is in place (which is further discussed later in the below paragraphs).
63. As part of this process, a cap of 9,500 net additional homes has been agreed for Phase 1 until a BLE construction contract is in place. In this case, recognition has been given to the severity of the need to provide housing stock along with retaining a good quality employer within Southwark on an improved and functional floorspace to support Jewson in continuing their operations. As such, officers have worked to incorporate the redevelopment of the subject site into the 9,500 cap.

Prematurity

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

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

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

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

66. The most up to date adopted development plan documents pertinent to the Old Kent Road are the 2021 London Plan and the Southwark Plan 2022. These identify the Old Kent Road Opportunity Area as having significant potential for housing led growth. The draft OKR AAP has been developed in response to the adopted London Plan (and its previous iteration London Plan 2016) and has also sought to address the increased housing target for the opportunity area and the need to ensure that the London Plan aspirations for employment and residential are addressed. The scheme under consideration here is not considered to undermine either the strategic or local plan making process, and reflects the adopted statutory development plan position of the 2021 London Plan, the Southwark Plan 2022, and the 2017 and 2020 draft OKR AAPs. It is not therefore considered to be premature.

Conclusion on land use

67. The scheme would deliver major regeneration benefits, including a significant contribution to the borough’s housing stock, 40.3% affordable housing, the re-provision of the Jewson Builders’ Merchants, and a significant improvement to the existing commercial space. It is therefore considered that the development, in land use terms, is acceptable, and its contribution to the surrounding Old Kent Road Opportunity Area (OKROA) should be supported.

AFFORDABLE HOUSING AND DEVELOPMENT VIABILITY

Affordable housing

68. National, regional and local planning policies place a high priority on the delivery of affordable housing as part of the plan led approach to addressing the housing crisis. Southwark’s Strategic Housing Market Assessment (SHMA) identifies a need for 2,077 social rented and intermediate homes per annum which is approximately 71% of Southwark’s total housing need. The SHMA suggests that approximately 78% of the total affordable housing need is for intermediate housing to meet the housing needs of lower and middle income residents. However, the most acute need is for social rented housing to meet the needs of homeless households living in unsuitable temporary accommodation such as bed and breakfasts or overcrowded conditions.
69. The regional policies relating to affordable housing are set out in the London Plan 2021, with the three key policies being H4, H5 and H6. These should be applied having regard to the Mayor’s ‘Housing’ and ‘Affordable Housing and Viability’ SPGs. Policy H4 requires development to deliver the maximum reasonable amount of affordable housing, with the Mayor setting a strategic target of 50%. Policy H6 also prescribes the tenure split of affordable housing. It requires:

- at least 30% to be low-cost rent (social rent or London Affordable Rent);
 - at least 30% to be intermediate (with London Living Rent and shared ownership being the default tenures); and
 - the remaining 40% to be determined by the borough as low-cost rented homes or intermediate tenure(s) based on identified local need.
70. The Southwark Plan Policy P1 sets a requirement for a minimum of 25% of all the housing to be provided as social rented and a minimum of 10% intermediate housing to be provided. In accordance with Policy P1, rooms that are over 28sqm have been counted as two habitable for the purposes of calculating affordable housing. This accounts for large open plan living room spaces that include kitchens and dining areas.

Table: Affordable housing mix

	Block A		Block B				TOTAL		
	Social Rent		Intermediate		Private		Units	HR	%
	Units	HR	Units	HR	Units	HR			
1 Bed	5	10	8	16	40	80	53	106	31.2%
2 Bed	16	48	12	36	54	162	82	246	48.2%
3 Bed	0	0	6	24	15	60	21	84	12.4%
4 Bed	14	70	0	0	0	0	14	70	8.2%
	35	128	26	76	109	302	170	506	100%

71. In total, 506 habitable rooms would be provided in the proposed development. Of this amount, 128 habitable rooms equating to 35 units forms the social rent aspect of the development, 76 habitable rooms makes up the 26 units in the intermediate tenure, and 302 habitable rooms that amounts to 109 private units. In total 40.3% affordable housing is proposed with 25.3% proposed for social rent, and 15% proposed for the intermediate tenure based on habitable rooms. This exceeds the requirement for 25% of homes to be social rented complying with Policy P1.
72. With regards to access to grant funding, the applicant (Twenty Twenty Ilderton Wharf Limited and SGBD Property Holdings Limited) has not applied for grant funding from the GLA for the additional affordable housing. However, they are seeking to partner with a Registered Provider (RP) post consent to deliver the affordable housing, and the RP may want to access grant funding at that point. It is therefore considered that the need to maintain the ability for an RP to access potential grant funding is allowed post consent.

Development viability

73. Policy P1 states that where development that provides 40% affordable housing, with a policy compliant tenure mix, (e.g. a minimum of 25% social rented and a minimum of 10% intermediate housing) as set out in table 1 with no grant subsidy can follow the fast-track route. Where developments follow the fast track route they will not be subject to a viability appraisal. The fast-track route for affordable housing provision has also been agreed with the GLA during pre-application discussions. A viability appraisal will

be necessary if amendments are proposed to lower the affordable housing provision to less than 40% following the grant of planning permission.

74. As the development provides 40.3% affordable housing based on habitable rooms, totalling 61 units, the development is therefore eligible for the fast track route. Given the above, the application is compliant with policy and therefore does not require a viability assessment to be submitted with the application.

Conclusion on affordable housing

75. In conclusion, this development does not currently benefit from public subsidy (although grant funding may be applied for in the future by a Registered Provider once appointed), and provides a combined affordable housing offer of 40.3% that exceeds Policy P1 fast track requirements. The delivery of social rent, and intermediate units is a very positive aspect of the proposals. In line with section E of London Plan Policy H5, to ensure the applicant fully intends to build out the permissions, the requirement for an Early Stage Viability Review will be triggered if an agreed level of progress on implementation is not made within two and a half years of the permission being granted. This will be secured through the S106 Agreement.

DESIGN CONSIDERATIONS

76. The NPPF requires 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 layout

77. 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 to determine site capacity. This design led approach is also reflected in Southwark Plan Policy P18. 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 to ensure that a high quality public realm that encourages walking and cycling is safe, legible, and attractive is secured. *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.*

78. The proposed layout of the site would comprise of one urban block to the north of the site with a 2 storey commercial podium, 9 storey shoulder fronting Ilderton Road and a tower block at the north-eastern edge of the site adjacent to the railway viaduct. The block typology aligns with the rectilinear nature of the site. The proposed tower block is articulated into two separate massing's reaching 25 storeys at the north and stepping down to 23 storeys to the south. This articulation reduces the bulk of overall perceived massing. The 9 storey shoulder block provides a transition in scale to the frontage along Ilderton Road and will be in line with the shoulder height of emerging neighbouring development along Ilderton Road.
79. The proposed layout improves the relationship with surrounding streets providing increased active frontages. Residential entrances are setback from the north-western corner of the site onto Ilderton Road and Surrey Canal Road. Significant increases to the width of the pathway at this junction improves the public realm and pedestrian permeability, located in close proximity to pedestrian crossings and residential entrances. Improvements to the streetscape include the widening of the pavement along Ilderton Road to 3.8m with the integration of planting as a buffer between the highway and pedestrians. This also enhances the public realm as well as commercial and residential entrances areas including double height entrance lobby spaces.
80. The proposed typology re-locates the Jewson warehouse and shop into the podium of the development with continued use of the working yard. Separate access routes are proposed to manage the reconciliation of uses, with a proposed residential access and servicing situated to the north from Surrey Canal Road, and retention of the yard access to Jewson's from Rollins Street to the south of the site. The constraints of the site do not allow for a shared access between residential and industrial uses, due to safety concerns with pedestrians and a constrained site and the need to keep the Jewson operation separate from the residential. To the rear of the site is the residential loading bay which will be accessed in a controlled manner from Surrey Canal Road.

Height Scale and Massing (including consideration of Tall Buildings)

Image: The development, viewed from Ilderton Road looking southbound



81. London Plan Policy D9 provides policy requirements for 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 and 350 units per hectare must have undergone at least one design review or demonstrate that they have undergone a local borough process of design scrutiny.
82. Southwark Plan Policy P17 deals with tall buildings. The policy identifies this site as suitable for tall buildings as it is located within the Old Kent Road opportunity core area. The policy sets out a list of requirements for tall buildings of which 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.

83. Policy 8 of the Draft OKR AAP sets out a tall building strategy with the ‘Stations and Crossings’ reinforcing the proposed hierarchy of buildings. The three tier strategy defines a clear building height strategy across the opportunity area. ‘Tier One’ buildings represent developments that exceed 20 storey’s in height. These developments are proposed to be sited in the vicinity of the proposed BLE stations, to mark their city wide significance and optimise the use of land in the most accessible locations. Mid height ‘Tier Two’ buildings proposes building heights within the range of 16 to 20 storeys to mark places of local importance to help define their character and assist wayfinding. ‘Tier Three’ tall buildings up to 15 storey’s will act as markers within the neighbourhood. The strategic locations of Tier One and Tier Three buildings assist in wayfinding and markers at a junction.
84. The policy states that the design of buildings should carefully consider their impact on the skyline and their relationships with the surrounding context, be of exemplary design and provide high residential quality where new homes are provided. The site is identified within the OKR AAP as having scope to provide a taller Tier 2 building given its location at the important junction between Ilderton Road and Surrey Canal Road. In the 2017 draft AAP tier 2 buildings were defined as being up to 25 storeys and it was on that basis that pre application discussions began in 2019. Given that context and the public benefits of the scheme it is therefore considered that the tallest part of the building is line with ambitions for the site contained within the OKR AAP.

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



85. This mixed use development forms a single urban block composed of a variety of strata; a two-storey industrial podium that stretches across the majority of the urban plot with a nine-storey shoulder block and a 23/25 storey tower block located at the north eastern edge of the site forming the upper residential uses. The proposed shoulder block is considered to provide an appropriately scaled frontage onto Ilderton Road, responding to the surrounding context. A vertical tower is located to the north eastern edge of the site by the railway track reaching 25 storeys at its highest point

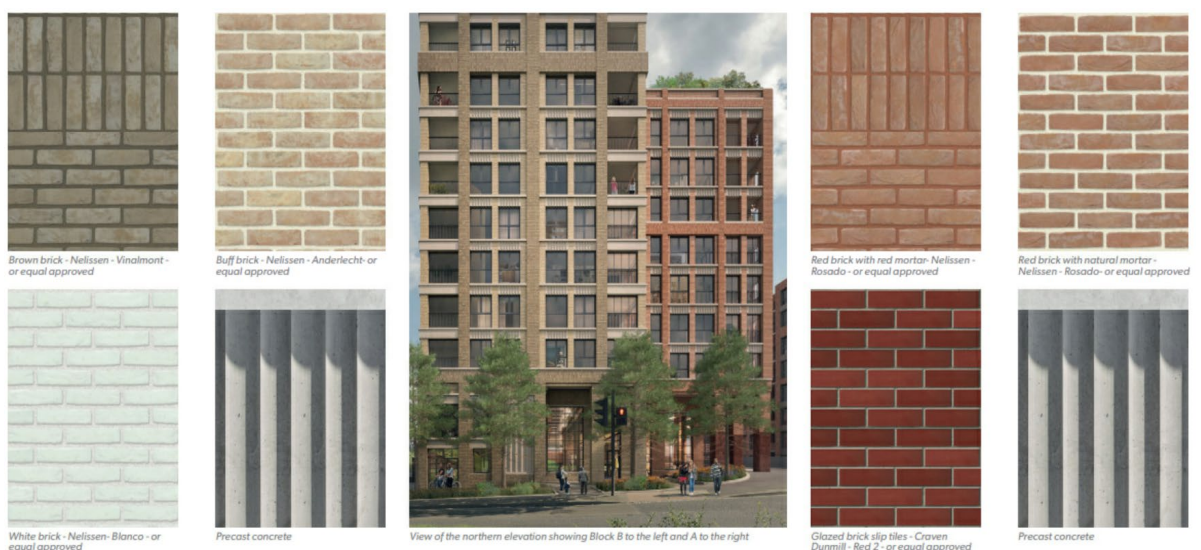
- and 23 storeys at its lowest. The massing of the tower is reduced through articulation of the urban form, mimicking an H shaped block, with central intrusions. A step down in height to the south of the site has a slight reduction in the overall scale as perceived from the courtyard space. This articulation of the East and West elevations contributes to reducing the perceived bulk from these views. While the massing and height of the proposal contrasts with the low-rise buildings adjacent to the site, it does not conflict with the prevailing pattern of development within the wider planned context. The proposal is considered to be in line with the tall building strategy outlined in the AAP and Policy P17 in the Southwark Plan.
86. The proposal provides a sophisticated transition in scales to form a frontage along Ilderton Road and provides articulation to the massing of the development. Building frontages have been generously set back from the edge of the urban plot to create an increased public realm with the provision of landscaping and planters along the pathway. At the north-western corner residential entrances have been recessed to provide an improved public realm, and provides positive inviting entrances for residents, with a 2 storey lobby entrance. The proposed podium has been designed to give a strong street presence along Ilderton Road, increasing active frontages and providing entrances to both residential and commercial uses, from the primary road.
 87. The design of the urban block takes into account the base, middle and top principles, providing articulation across the facades and block. Providing interest for immediate, mid-range and longer views as identified in the London Plan 2021. The railway line provides a physical barrier between the boroughs of Southwark and Lewisham. The tower will improve urban legibility, positioned along the eastern edge of the railway viaduct at the junction of borough boundary. The composition of the tower is expressed in a bricked verticality, with a clear grid order which is resumed on the shoulder block. Deep reveals and recessed balcony corners accentuate architectural interest. The scale and robust quality of the brick columns relate to the industrial character of the area and the adjacent railway arches.
 88. The two storey base was established along Ilderton Road to allow for a distinct language of the commercial element, and to improve the relationship of the proposed development with adjacent terraces. Large cut-out setback adds to the public realm and wraps around the north western corner of the building. Whilst providing visual emphasise of residential entrances, establishing a street presence along Ilderton Road. The urban block has been setback to provide sufficient streetscape, pavement space and appropriate landscaping for the development. Improvements have been made at the 'knuckle' of the site to provide increased public realm, reaching around 7m at residential entrances, providing a positive grounding to the development. Ground floor glazing provides visual connection to the internal builders yard functions creating mproved pedestrian access and active frontages to the existing Jewson's uses along Ilderton Road.
 89. In line with the draft OKR AAP, the design of the tall buildings would be exemplary, with careful consideration of their impact on the skyline. For the reasons set out above it is considered that the proposal accords with Policy P17 in terms of the principal requirements for tall buildings as well as Policy 8 of the Old Kent Road Area Action Plan. Additionally, this application was accompanied by a Heritage, Townscape and

Visual Impact Assessment. The impact on protected views and heritage assets is discussed in the relevant section of this report.

Architectural design and materiality

90. 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.
91. The use of different materials on each block provides architectural interest and further defines the articulation of the massing whilst providing separation between the uses. The proposal will be viewed as a cluster of buildings rather than an overwhelming mass of development. Further articulation was provided to the Tower following earlier advice and it is now considered that a positive design outcome has been reached. The difference between the two taller elements provides visual interest and articulation between the forms.
92. The glazed red tile finish of the shoulder block provides an appropriate finish that fronts the public realm, whilst also demarcating the commercial areas of the development. The architectural language of the development provides a strong robust appearance that reflects the emerging and existing character of the area.
93. The high quality architecture is considered to enhance the existing appearance of the subject site whilst referencing the surrounding context. Submitted details ensure that there would be depth and articulation to facades of the development. This level of detail will be secured through the inclusion of conditions in order to ensure that this level of design quality is maintained in the construction of the proposal. These conditions have been attached to the decision notice.

Image: Materiality palette



Landscaping

94. Policy P59 of the Southwark Plan (Green infrastructure) states that major developments that are referable to the Mayor of London must provide new publically accessible open space and green links. Additionally, developments should provide multiple benefits for the health of people and wildlife, and to integrate with the wider green infrastructure network and townscape / landscape, increasing access for people and habitat connectivity. Point 3 of London Plan Policy G1 (Green Infrastructure) requires Development Plans and Opportunity Area Planning Frameworks should identify key green infrastructure assets, their function and their potential function. They should also identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.
95. An indicative landscaping strategy is proposed for the site which outlines a high-quality approach towards hard and soft landscaping throughout. Extensive and appropriate planting and landscaping in the communal amenity areas and on the site boundaries has been incorporated into the design to indirectly connect and enhance the Senegal Railway Banks SINC on the eastern boundary of the site.

Image: Landscape proposals podium level

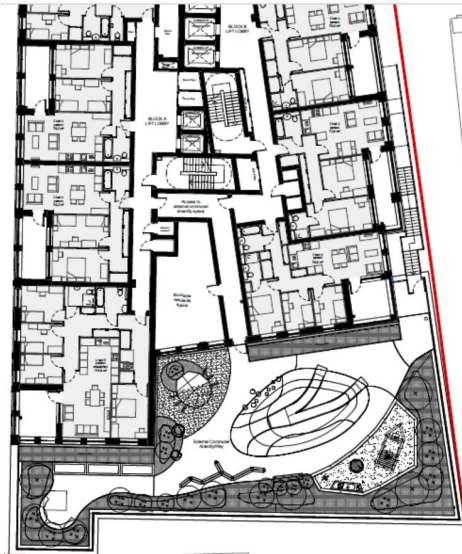


Image: Landscape proposals 8th floor



96. Overall, the landscape proposals are considered to be a significantly positive aspect of the redevelopment of the subject site. All plans are indicative with detailed landscape plans involving hard and soft features being subject to conditions which are attached to the decision notice. The hard and soft landscaping condition will require appropriate buffering to units fronting onto the communal amenity spaces proposed within the development.
97. With regards to the proposed Green Wall within the amenity space, the submitted fire safety statement addresses aspects of external fire spread by stating that external walls will be class A2-s1, d0 or better. In addition, the climbers are growing on the pergola on the 8th floor roof garden and not on the building facade which is effectively integrated into the wider landscape proposals. The statement demonstrates that the external walls should be either of limited combustibility or non-combustible and no objections are raised to the incorporation of the Green Wall into the proposals. A condition will require details of the green wall planting to be submitted including confirmation that it is of a non-combustible nature.
98. The security of future residents has also been considered, with lighting arranged around the external amenity areas. The lighting is of a low level and has been strategically placed so that there are no hidden corners within the amenity spaces. A lighting strategy is secured by condition and attached to the decision notice.

Ecology

99. An Ecological Appraisal (PEA) has been prepared by Tyler Grange dated December 2021. The EA has identified habitats that are present on site are of negligible ecological value and require no specific mitigation for their removal. The nearest

designated site is the Senegal Railway Banks SINC, which abuts the eastern boundary of the subject site. Shading from the tower is anticipated to affect the northern most tip of the SINC only, and only for small proportion of the day (from mid-late afternoon onwards). It is considered that the proposals do not present any negative direct impacts on the statutory designated site, as the site is already subject to high levels of disturbance and as its flora is dominated by shade tolerant and intermediate shade tolerant species.

100. As part of the Construction Environmental Management Plan (CEMP) that will need to be produced prior to construction taking place, the CEMP should be produced to manage construction activities and prevent any adverse effect on the SINC.
101. During consultation with the council's Ecologist, bird and bat boxes have now been positioned higher on the building and are positioned between 3m and 6m above ground under the parapet, but above the windows. Overall, the ecological proposals for the site raises no objection from Southwark's Ecologist. Recommended conditions have been attached to this decision to ensure compliance.

Urban greening factor

102. Policy G5 of the London Plan 2021 encourages major developments 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 also recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for commercial sites.

Image: Urban Greening Factor score

Urban Greening Factor Calculator				
Surface Cover Type	Factor	Area (m ²)	Contribution	Notes
Semi-natural vegetation (e.g. trees, woodland, species-rich grassland) maintained or established on site.	1	0	0	
Wetland or open water (semi-natural; not chlorinated) maintained or established on site.	1	0	0	
Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm.	0.8	491.38	393.104	
Standard trees planted in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree.	0.8	287.54	230.032	
Extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) – meets the requirements of GRO Code 2014.	0.7	343.73	240.611	
Flower-rich perennial planting.	0.7	35.33	24.731	
Rain gardens and other vegetated sustainable drainage elements.	0.7	109.53	76.671	
Hedges (line of mature shrubs one or two shrubs wide).	0.6	0	0	
Standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree.	0.6	0	0	
Green wall –modular system or climbers rooted in soil.	0.6	29.53	17.718	70% coverage of pergola
Groundcover planting.	0.5	0	0	
Amenity grassland (species-poor, regularly mown lawn).	0.4	0	0	
Extensive green roof of sedum mat or other lightweight systems that do not meet GRO Code 2014.	0.3	0	0	
Water features (chlorinated) or unplanted detention basins.	0.2	0	0	
Permeable paving.	0.1	935.17	93.517	
Sealed surfaces (e.g. concrete, asphalt, waterproofing, stone).	0	0	0	
Total contribution			1076.384	
Total site area (m²)				2513.71
Urban Greening Factor				0.428205322

103. Given the operational requirements for a builders merchants such as Jewson, the external yard area cannot be landscaped. The nature of the working builders merchant yard requires that sufficient space is provided for vehicular turning, torque, and working access. Therefore, in this instance, the substantial area of external yard space within

the site is essential to the operational requirements for Jewson and is not included in the UGF calculations for the development.

104. Given the above paragraph, the total site area within the development for UGF values is 2,512M², which is formed from the residential building area including public realm, communal amenity and biodiverse roofs. The UGF score would amount to 0.42, which is an increase on the guidance target within the London Plan.

Trees

105. London Plan Policies (G1 & G7) and Southwark Plan Policy P61 require that wherever possible, existing trees of value are retained.
106. There are four existing trees on the Surrey Canal Road frontage of the subject site. As part of the comprehensive redevelopment of the site, these existing trees are to be removed. The four trees fall under Category B and C and are required to be removed to enable the development. In their place, six trees are to be planted along the Surrey Canal Road frontage with the replacement trees considered to have greater physical and visual value.
107. Point 4 contained within P61 of Southwark Plan states that where trees are removed to facilitate development, they should be replaced by new trees which result in no net loss of amenity, taking into account canopy cover as measured by stem girth; either
1. Within the development whereby valuation may be calculated using the (CAVAT) methodology or other assessment; or
 2. If this is not possible, outside the development. In this case a financial contribution must be provided to improve borough tree planting located according to 'right tree right place' principles. The financial contribution will include ongoing maintenance costs where trees are planted in the public realm.
108. The scheme provides acceptable replacement trees at street level suitable to site and species. The trees which are to be removed are Category B and C trees and are of a size such that 5 x 20-25cm /25-30cm replacements would ensure a continuity of canopy cover and amenity. Together with the proposed podium planting there is no net loss in canopy cover as measured by stem girth and so the onsite mitigation strategy is fully compliant with Policy P61 of the Southwark Plan 2022.
109. At podium level, the species palette is welcomed. The applicant suggests a soil depth of 850cm, which is on the lower limits for tree establishment and a minimum of 3.5m available soil would be required for each of the trees. In total 21 trees are proposed and their establishment, replacement and care, along with other soft landscaping elements would need to be conditioned for the longevity of the building. These conditions are attached to the decision notice.

Design Review Panel

1st Design Review Panel - Spring 2021

110. The proposal was subject to the Design Review Panel (DRP) during spring of 2021. The response from the DRP was generally favourable, although some key issues were identified. These are discussed below.
111. The Panel raised concerns over the commercial workspace along Ilderton Road and its poor relationship with the street as it rises above the plant spaces. Additionally, the Panel thought that the residential drop-off area was insufficient, and that the commercial entrances lack distinction.
112. Officer comment: Following the comments received, the commercial space along Ilderton Road was lowered to pavement level along its length so provide a stronger connection with the street level that assists in activating the development along Ilderton Road. In light of the DRP comments, the residential drop-off area was expanded to increase capacity of delivery vehicles, and the entrance to the commercial unit from Ilderton Road was redesigned to give the unit a setback covered entrance.
113. The Panel thought that the scheme was too tall, and that the taller building has a lack of variety and articulation.
114. Officer comment: Following concerns of the height, the tower block was reduced down from 28 storeys to 25, with the shoulder block dropping from 14 storeys to nine storeys fronting onto Ilderton Road. This shoulder height reflects the heights of the developments adjacent at 60A and 62 Hatcham/134-140 Ilderton Road, and 180 Ilderton Road. Additionally, the scheme is now lower than the 28-storey tower approved as part of the Leathams redevelopment at 227-255 Ilderton Road immediately to the south of the subject site. Regarding the lack of variety and articulation the tower was refined and broken into two portions that break the buildings into smaller forms with their own distinctive character.

2nd Design Review Panel – Autumn 2021

115. The revised scheme was subject to a second round at the Design Review Panel scrutiny in Autumn 2021. The overall response was from the DRP was positive with articulation and character incorporated into the reduced massing of the development.
116. The Panel felt that whilst the reduced height of the tower provided a more appropriate massing, the tower does not finish with enough celebration. Additionally, the Panel thought that the 'knuckle corner' of Ilderton Road and Surrey Canal Road felt tight.
117. Officer comment: The scheme has a brick framing to the northern portion of the tower which was re-proportioned to give a greater emphasis to the top of the building. A secondary framing 'crown' was added to the southern portion of the Block B tower to create a distinctive top when viewed from the south. Regarding the corner knuckle, the area around the commercial and residential entrances was redesigned to provide additional pavement width and create a better public space between the two pedestrian crossings.
118. The Panel also raised a query over the commercial frontage not being differentiated from the residential entrances, and that the connections between the cycle and storage area with the lobbies was not clear.

119. Officer comment: To differentiate the commercial frontage from residential entrances within the scheme, the use of glazed brick slip tiles along the commercial frontage with rounded corners was introduced to highlight the commercial areas and create an engaging materiality along the pedestrian realm of Ilderton Road. For the relationship between the lobbies and the cycle and refuse storage, internal levels changes were reduced to create a simpler internal arrangement.

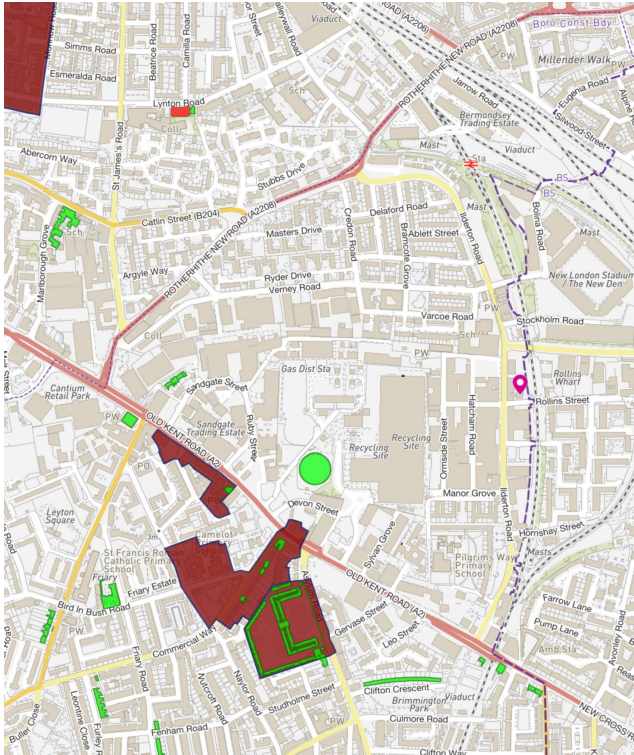
HERITAGE AND TOWNSCAPE CONSIDERATIONS

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

Conservation areas

121. The subject site is not located within the boundaries of a conservation area, nor is it a listed building. The closest conservation area is Kentish Drovers and Bird in Bush, located approximately 550 metres southwest of the subject site. Designated heritage assets within 500 metres of the site is limited to Grade II listed Gasholder no. 13 which is located approximately 430 metres southwest of the subject site.

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



Draft OKR APP and draft Local List

122. Although of limited weight, the draft OKR AAP also identifies buildings and features of townscape merit and buildings of architectural or historic interest. These buildings are also included on the draft Local List published by the council in March 2018. The following are within or immediately adjacent to the application site:

Table: Draft AAP Building or Feature of Townscape Merit within the immediate vicinity of the site:

Property	Description
209-225 Ilderton Road	Building of Townscape Merit
Penarth Centre, 30 Penarth Street	Building of Townscape Merit
Christ the King Chapel, 8 Manor Grove	Building of Townscape Merit

Townscape and Visual Impact Assessment (TVIA)

123. BWB has submitted a Townscape and Visual Impact Assessment (TVIA) as part of this application. The study area for the TVIA is taken to be a 2km radius from the site and has been informed by the Zone of Theoretical Visibility (ZTV). The effects on settings of heritage assets or ecological/ environmental assets will not be assessed within this TVIA, although effects on built landmarks are considered if they contribute

to townscape character. Effects on Conservation Areas and Listed Buildings are considered in terms of impact on present day users and residents in addition to townscape effects.

124. The scale of the townscape and visual effects is determined by considering both the sensitivity of the townscape feature, townscape character or view with the magnitude of change. The scale of effects is described as neutral, very low, low, medium, or high. The following table provides a breakdown of how the effects are assessed and rated.

Table: Magnitude of change to views

Magnitude	Criteria
Neutral	No discernible change to townscape character arising from the development. Development is wholly compatible with existing townscape. No enhancements incorporated, so effect is neutral.
Very low – adverse or beneficial	There is a barely discernible change to aesthetic and/or perceptual attributes of townscape character and such changes occurs across a very limited geographical area and/or proportion of the townscape receptor. These may be either adverse or beneficial, such as slight design differences between established townscape and proposals. The effects are of short duration and reversible.
Low – adverse or beneficial	Adverse - Townscape features and elements of importance to the character of the baseline are lost over the site area and immediate surroundings and can be wholly restored or replaced. Beneficial – a localised improvement in features and elements at the site level and immediate surroundings. Adverse – minor aesthetic changes in townscape character come about. The Proposed Development is a minor new feature. Beneficial – minor improvements to townscape aesthetics (design or hard and soft landscape enhancements, at the site level and immediately adjacent to the site. The effects may be of short to medium duration and reversible.
Medium – adverse or beneficial	Adverse - Townscape features and elements of importance to the character of the baseline are lost over a limited area and can be partly restored or replaced. Beneficial – a localised improvement in townscape character Aesthetic and/or perceptual attributes of townscape character are affected to the extent that the Proposed Development becomes a noticeable new feature but does not compete with other aspects. This may be evaluated as either adverse or beneficial, depending on the nature of the change. The change to aesthetic/perceptual aspects occurs across a moderate geographical area and/or proportion of the townscape receptor. The effects are of medium to long duration and reversible

<p>High – adverse or beneficial</p>	<p>Adverse - Loss or irreparable damage to townscape features and elements over a wide area and/or of key importance to the character of the baseline.</p> <p>Beneficial – wide scale improvements to townscape character that has been established to be in need of improvement.</p> <p>Aesthetic and/or perceptual aspects of townscape character are affected such that the Proposed Development becomes a key additional aspect and competes with other aspects. This may be either adverse or beneficial, depending on the baseline condition of the landscape and what is being proposed.</p> <p>The effects are of long duration and/or irreversible.</p>
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125. There are nine viewpoints within a two-kilometre radius conducted as part of the TVIA assessment. The table below provides detail on the distance of the viewpoint to the development site, potential receptors, the value of the view, the susceptibility of the view, and the sensitivity of the viewpoint. The table below has omitted viewpoint 9 from the assessment as this is taken from Parliament Hill, and that specific viewpoint is discussed further below under the London View Management Framework section.

Image: Viewpoint locations

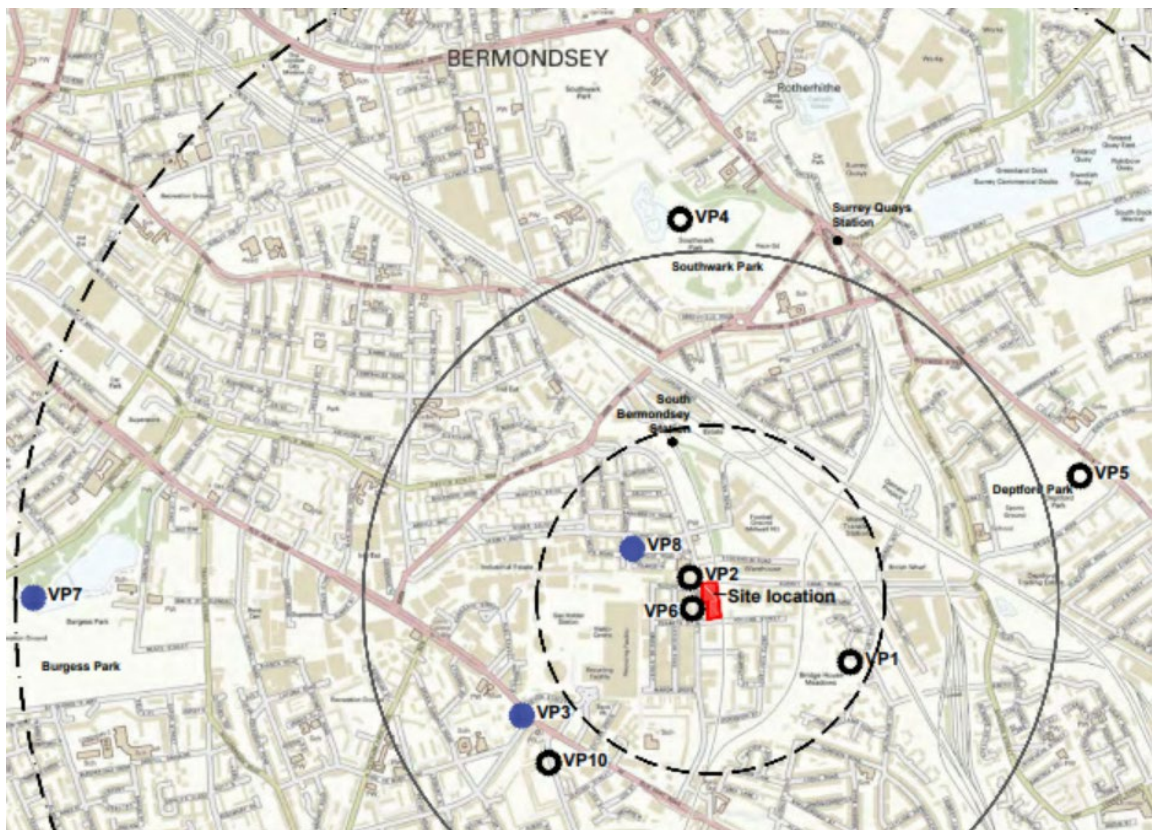


Table: Viewpoint assessment

<u>Viewpoint and Location</u>	<u>Distance to site boundary</u>	<u>Receptors</u>	<u>Value (Of view)</u>	<u>Susceptibility to change</u>	<u>Sensitivity</u>
1. Bridgehouse Meadows	0.31km	-Recreational users of Public Open Space -Cyclists -Pedestrians	Medium	Low/Medium	Low
2. Ilderton Road junction with Surrey Canal Road	24m	-Pedestrians -Road users	Low	Medium beneficial	Low
3. Old Kent Road junction with Commercial Way	0.59km	-Residents -Pedestrian -Road users	Low	Neutral	Very low
4. Southwark Park (adjacent to the Pond)	1.03km	-Recreational users of Public Open Space -Pedestrians -Cyclists	Medium	Neutral	Low
5. Deptford Park	1.06km	-Recreational users of Public Open Space -Pedestrians -Cyclists	Medium	Neutral	Low

6. Ilderton Road opposite no.212	15m	Pedestrians Road users	Very low	Neutral	Very low
7. Burgess Park (At Picnic Area)	1.9km	-Recreational users of Public Open Space -Pedestrians -Cyclists	Medium	Neutral	Low
8. Bramcote Park, Varcoe Road	0.22km	-Residents -Recreational users of Public Open Space -Pedestrians -Road users	Low	Medium	Medium
10. Asylum Road	0.6km	-Residents -Pedestrians -Road users	Very low	Very low	Very low

126. The assessment of all nine viewpoints indicates that, while the proposed development will introduce change to the subject site and its locality, such change can be accommodated without unacceptable effects on townscape character and visual amenity. While the massing and height of the building contrasts with the mainly low-rise buildings of the surrounding area, it does not conflict with the prevailing pattern of other existing or proposed developments within the wider context of OKR16 and the OKROA.

London View Management Framework

127. A number of strategic views as defined in the London View Management Framework (LVMF) (March 2012), are panoramic viewpoints located in north London. The viewsplay takes in a wide panorama of the city centre and Southwark forms a distant backdrop to these views. The views identified in the LVMF are; Alexandra Palace, Parliament Hill, Kenwood, and Primrose Hill.

128. The viewpoints mentioned above are all located at a distance of 9 kilometres and more from the subject site. The changes to the visual character of the townscape and views resulting from the proposed development of this scale and distance is not going to be discernible in the backdrop to the City and are at such a distance they have no bearing on the silhouette of key City landmarks, blending into the general urban context.

Strategic Borough Views - Southwark

129. The site is not in any Borough views.

Image: Southwark Strategic Borough Views (Subject site highlighted in red)



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

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

Table: Impact on heritage significance

Listed Buildings and Conservation Areas	Assessment of Impact on heritage significance
LVMF Views	No harm identified
Local Views	No harm identified
Kentish Drovers and Bird In Bush Conservation Area	No harm identified

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

131. In conclusion, the proposed development would not have a significant impact on the views assessed despite it being a highly visible feature in the immediate townscape. Given the substantial distance to nearby heritage assets, and taking into consideration the height of the development, the scheme is considered to be a beneficial addition to the London Skyline that would successfully integrate into the immediate area and would not cause harm to any of the heritage assets listed above.
132. Whilst limited weight has been given to emerging policy, full weight has been given to adopted policies, including the NPPF (2021), London Plan (2021) and Southwark Plan (2022). As can be seen from the assessment contained within this report, the development is considered to be in compliance with these adopted policies.

HOUSING MIX, DENSITY AND RESIDENTIAL QUALITY

Housing mix

133. Southwark Plan Policy P2 seeks to ensure that a minimum of 20% of family homes with three or more bedrooms are provided in the Action Area Cores (which would apply to this Old Kent Road site) and a minimum of 25% of homes with three or more bedrooms are provided in the urban zone. The policy also requires two bedroom homes as a mix of two bedroom three person and two bedroom four person homes. The housing mix requirements are replicated in the draft OKR AAP (Policy 4).
134. Policy H10 of the London Plan relates to housing size and mix; it seeks to guide borough and developers on unit mix within new residential developments, and states that schemes should generally consist of a range of unit sizes having regard to robust local evidence, the requirement to deliver mixed and inclusive neighbourhoods and the range of tenures in the scheme.

Table – Housing Mix:

<u>Dwelling size</u>	<u>No. of units</u>	<u>Percentage</u>
1 Bedroom	53	31.18%
2 Bedrooms	82	48.23%
3 Bedrooms	21	12.36%

4 Bedrooms	14	8.23%
Total	170	100%

135. The table above demonstrates that the development would provide 68.82% of the new units as two or more bedrooms. In addition, 20.59% of units would be family homes with three or more bedrooms. This meets the percentage required for Action Area Cores. In addition following discussions with the applicant the scheme also benefits from the inclusion of all 14 four bedroom homes forming part of the social rent provision within the development.

Wheelchair Housing

136. Policy P8 of the Southwark Plan requires at least 10% of the dwellings, by habitable rooms, across the subject site to meet Building Regulation M4(3) 'wheelchair user dwellings' (with 10% of the social rented homes meeting Building Regulation M4(3)(2)(b) 'wheelchair accessible dwellings' as thus available for immediate occupation). All other dwellings will be delivered to meet M4(2) 'accessible and adaptable dwellings' standards.
137. 16 units within the scheme of the proposed new homes would meet Building Regulations Part M4(3)(2)(a) 'wheelchair adaptable', which equates to 10.5% of all dwellings by habitable rooms. The wheelchair user dwellings would be secured through the Section 106 Legal Agreement.

Density

138. The Southwark Plan does not contain specific density matrices and ranges for different areas of the borough. Instead, it sets out a range of criteria relating to good design and appropriate density in the context of a site-specific approach, including in policies P13 Design of places, P14 Design quality, P15 Residential design and P18 Efficient use of land. Criteria across these policies require among other things that:
- Development's height, scale, massing and arrangement responds positively to the existing townscape, character and context;
 - Buildings, public spaces and routes are positioned according to their function, importance and use within the townscape;
 - Adequate daylight, sunlight, outlook and a comfortable microclimate is accommodated for future and existing occupiers
 - Development provides a high standard of residential design quality
 - Development optimises the use of land and does not unreasonably compromise development potential on neighbouring sites
139. This approach is consistent with the London Plan, within which policy D3 refers to optimising site capacity through a design led approach. The quality of the proposed units, the acceptability of the height and massing, the architecture, the townscape impacts, the neighbour amenity impacts and transport implications are set out in detail in the relevant sections of this report.

Quality of residential accommodation

140. London Plan Policy D6 (Housing quality and standards) states that housing developments should be of high quality and provide adequately-sized rooms, with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners. The policy sets out a range of qualitative design aspects for housing developments relating to dwelling size, aspect, daylight, layout and amenity space. Policy P15 Residential design of the Southwark Plan sets out that development must achieve an exemplary standard of residential design and must take into consideration the site context, the impact on the amenity of adjoining occupiers, and the quality of accommodation.

Unit size

141. Policy P15 of the Southwark Plan requires developments to meet the minimum national space standard. All of the units would comfortably meet or exceed the minimum total GIA space requirements set out in the nationally described space standards and as set out in the 2015 Technical Update to the Residential Design Standards SPD. The larger units consisting of 4 bedrooms are particularly sizable which when taking into account their likely occupation by a family, is a very positive aspect of the scheme.
142. All proposed homes would exceed the minimum standard of one, two, three, and four bedroom units, in accordance with the minimum space standards as per Table 3.1 of Policy H6 of the London Plan. The following tables provide a breakdown of the range of unit sizes contained within the development.

Table: Proposed flat sizes

Unit Type	SPD Requirement (sqm)	Size range proposed (sqm)
1 Bed 2 Person (flat)	50sqm	50 – 54.4sqm
1 Bed 2 Person (WCH)	65sqm	67.5sqm
2 Bed 4 Person (flat)	70sqm	70 – 74.4sqm
3 Bed 4 Person (flat)	74sqm	76.6 – 77.4sqm
3 Bed 5 Person (flat)	86sqm	91.3sqm
4 Bed 5 Person (flat)	90sqm	92.9sqm
4 Bed 5 Person (WCH)	110sqm	113.9sqm

143. The above table demonstrates that the development has successfully designed the layout of each floor to accommodate each bedroom type without compromising the

quality of accommodation. Layouts of the flats are well proportioned with no hidden corners with an emphasis of ease of movement and circulation within each flat. Furthermore, each apartment prioritises placing the open plan living / kitchen / dining room to the front facade of the building to maximise potential for natural daylighting and views. Overall, it is therefore considered that the size and layouts of the units are acceptable, and would provide a good quality of accommodation.

Internal daylight and sunlight

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

Overlooking and privacy within the proposed development

145. The unit most at risk of potential overlooking and loss of privacy within the development is the 3 bed 4 person unit in Block B, and the 4 bed 5 person WCH unit in Block A, of which both abut the first floor communal amenity space. Submitted plans demonstrate that privacy buffers will be created to mitigate against any potential overlooking or loss of privacy from within the development. In addition, the two units in Block B, one bed two person, and two bed three person, which abut the communal spaces provided on the eighth floor terrace do not show privacy buffers in the submitted drawings; however, details of the privacy buffers for all potentially affected units will be secured within the hard and soft landscaping condition attached to this decision notice.

Number of units per core

146. The design of the development has been split into two blocks; Block A, and Block B. Block A accommodates the social rent aspect of the development, with Block B providing the intermediate and private sale units. In order to maximise dual aspect units across the floor area, Block A provides a mix between two and five cores per floor, and Block B provides a mix of five and six cores per floor. The centralised location of the lift enables smaller the development to avoid long corridors on each floor. The number of units per core means that the development provides 58% of the units as dual aspect units.

Secured by Design

147. The Metropolitan Police Secure By Design officer has held discussion with the applicant and is satisfied that the development can achieve Secure By Design accreditation. Conditions recommended by the secure by design officer have been attached to this decision.

Conclusion on quality of accommodation

148. The floor layouts and size of the units proposed are a positive aspect of this development and enables the occupiers to move freely through each unit without contriving circulation and movement. The provision of children's playspace at first floor

level and an external terrace at the eighth floor for enhances the quality of accommodation for future occupiers to enjoy. It is therefore considered that the proposed development would provide a high quality of accommodation for future residents.

OUTDOOR AMENITY SPACE, PLAY SPACE AND PUBLIC OPEN SPACE

149. All new residential development must provide an adequate amount of useable outdoor amenity space. The Residential Design Standards SPD sets out the required amenity space standards which can take the form of private gardens and balconies, shared terraces and roof gardens. Policy S4 of the London Plan requires new developments to make provision for play areas based on the expected child population of the development. Children's play areas should be provided at a rate of 10sqm per child bed space (covering a range of age groups). In addition, P15 of the Southwark Plan requires the provision of 5sqm of public open space per dwelling.
150. Four categories of open space are required in major planning applications in the Old Kent Road Opportunity Area:
- Private amenity space: For units containing three or more bedrooms, 10sqm of private amenity space as required by the SPD; and for units containing two bedrooms or less, ideally 10sqm of private amenity space, with the balance added to the communal space;
 - Communal amenity space: 50sqm communal amenity space per development as required by the SPD; and
 - Children's play space: 10sqm of children's play space for every child space in the development as required by the London Plan.
 - Public open space: 5sqm of public open space per dwelling as required by the draft OKR AAP. If it is not feasible to deliver the open space on site, a financial contribution will be required.

Private outdoor amenity space

151. All of the proposed homes have been provided with private amenity space in the form of either; private balconies, or private winter gardens. The majority of homes have been designed to have at least 10sqm of private amenity space, which is a very positive aspect of the scheme, with the shortfall from each private amenity area included in the communal amenity space of the development.
152. The total amount of private amenity space proposed within the development is 1,603.40sqm. This results in a relatively small shortfall of 96.6sqm that is to be included in the provision of communal amenity space within the scheme.

Communal amenity space

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

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

154. As stated in the private amenity space consideration above, the shortfall of the private amenity has been included into the communal amenity requirement for this development. The scheme provides two communal amenity areas; one on the first floor terrace, and the other on the eighth floor terrace. Both spaces are south facing and are served by stair cores and available for use by all residents.
155. The following table summarises the communal amenity space requirements, against that proposed. All the podium and terrace communal amenity spaces would be accessible to all residents.

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

Communal amenity space proposed	Proposal	Shortfall
(Shared roof or terrace space)	193sqm Required 96.6sqm +50sqm = 146.6sqm	No shortfall (46.4sqm over provision)

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

Children's playspace

157. The child yield for the development has been calculated using the 'Providing for Children and Young People's Play and Informal Recreation' published as SPG in 2012 by the GLA using the GLA Population Yield Calculator (version 3.2).
158. The Mayor's SPG sets out the intended strategic approach to delivering new and enhanced play space both on and off-site in new developments. It explains that 'doorstep' play (Under 5s) should usually be provided on-site, unless there is existing provision within 100 metres. For 5-11 year olds and children over 12 years old, it recommends that off-site provision is acceptable, if there is existing provision within 100-400 metres and 400-800 metres respectively. This is summarised in Table 4.5 of the SPG, reproduced below.

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

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

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

159. The financial contributions required in line with the Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD (2015) would pay for 'off-site' provision, directly funding new and enhanced play equipment close to the site as part of a strategic approach. For example, if this scheme fell short on provision for each age group, the contribution would go towards new or existing park spaces within the OKROA.
160. Using the GLA's latest Population Yield Calculator (v3.2) and assuming Inner London and a PTAL of 3/4, the scheme generates a total child yield of 75.7, which equates to a total play space requirement of 757sqm. In total 757.3sqm of play space is provided on site.
161. The play space areas for each age group is provided on the first floor podium and eighth floor terrace. The design would incorporate landscaped features amongst a variety of play equipment that would be suitable for both children and toddler play. This will also require the submission of detailed planting and screening, and a detailed drawing condition requiring designs of the landscape, including all play provision, will be secured by condition. The applicant has been advised that any design of playspace will need to include water and sand play as required by the draft OKRD AAP. In addition detailed design of the terrace parapets will be secured by condition to ensure the safety of those using the amenity terrace space.

Children's playspace calculations

Table: Proposed areas of dedicated external play

Location	Area of dedicated play space
First floor podium	757.3sqm

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

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

Dedicated outdoor child play Space. This can be provided in either the communal or public open space but must be provided in addition to that space, rather than as a sub set of that space.	Required play space based on child yield.	Proposed play space	Shortfall
0-4 years	306.3sqm (306sqm required)	Play space proposed for all children located on the first floor podium and eighth floor terrace	0sqm
5-11 years	248sqm (248sqm required)		
12+ years	203sqm (203sqm required)		

Public open space

163. In addition to the adopted amenity space requirements set out above, emerging Policy AAP11 of the draft OKR AAP requires the provision of 5sqm of public open space per proposed home. The plan identifies that some sites are expected to provide public space as part of their redevelopment and others are not. In the later instance those site will be expected to make s106 contributions to off-site public space provision. This will be charged at £205 per square metre. As set out in the Section 106 and CIL SPD, £205 per sqm represents the average cost for improving open space in Southwark.
164. The subject site is identified within the OKR AAP as a site that is not required to provide public open space. Nevertheless it does provide 265 sqm of public space and in line with the aspirations of policy AAP 11 'Parks and Healthy Streets – The Greener Belt' of the OKR AAP, where the site does not provide 5sqm of public open space per dwelling in total, a financial contribution will also be secured through the S106.

Public open space calculation

Table: Public open space proposed

Public Open Space (Public space at ground floor, excluding play space)	Draft OKR AAP (2017) requirement AAP 11: Parks, streets, open spaces –The Greener Belt. (page 73)	Proposed public open space	Off-site Payment
	Provide 5sqm of public open space per dwelling. If it is not feasible to deliver the open space on site, a financial contribution will be required.	265sqm	585sqm shortfall 585sqm x £205 = £119,925
	850sqm required		

165. As set out in the table above, a financial contribution of £119,925 would be required. The payment of the financial contribution, which would be secured through the Section 106 Legal Agreement. The money would go towards the maintenance and improvements of public parks and spaces within the Old Kent Road Opportunity Area.

Sunlight amenity analysis within the proposed development

166. BRE guidance for overshadowing to gardens and open spaces within a development recommends that at least 50% of any garden or amenity area should receive at least one hour of sunlight on 21 March. The playspace and communal amenity areas located on the first floor podium and 8th floor terrace provide the external amenity sources for residents within the scheme. Tests undertaken using the BRE guidance demonstrate that the first floor podium and 8th floor terrace, owing to their predominantly south facing locations adhere to the BRE recommendations for sunlight amenity within developments.

Conclusion on outdoor amenity space, playspace and public open space

167. In conclusion, the private, communal and playspace proposals are of an exceptional quality with all provision provided on site. The locations of the amenity spaces are well thought out with south and southwest facing amenity spaces that enables the areas to maximise benefit from natural daylight and sunlight. The mix of private amenity options including balconies and winter gardens are well positioned and spacious for residents to enjoy. The children's playspace proposals are supported by officers and would provide a mix of imaginative and informal play options for children within the development. The landscape proposals for the external terrace areas are efficiently planned which is a positive aspect of the scheme. To ensure the spaces delivered are

of the highest quality, detailed landscape design and children's playspace are secured by condition and attached to this decision notice.

168. In addition to the above some public open space is provided on the site as well as agreed financial contributions that would directly fund the maintenance of areas of open spaces and parks within the opportunity area as required by the draft AAP. Overall, the provision of private, communal and children's playspace amenity on site is a significantly positive aspect of the scheme.

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

169. Policy P56 (Protection of amenity) of the Southwark Plan states that developments should not be permitted when it causes an unacceptable loss of amenity to present or future occupiers or users. This includes privacy and outlook impacts, overlooking or sense of enclosure, loss of daylight and sunlight, and unacceptable noise from developments.

Impact of the proposed uses

170. The retention of the existing Jewson with an improved facility along with the introduction of residential uses to the upper floors is considered to provide activation of the site at ground floor level, and would enhance the vitality and vibrancy of Ilderton Road. The proposed uses comply with the intentions of this site within OKR16 of the OKR AAP. On this basis, it is considered that the proposed uses would not cause any harm to surrounding neighbour amenities, and accordingly are all found to be acceptable uses.

Daylight and sunlight impacts

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

BRE daylight tests

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

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

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

174. Diffuse daylight is the light received from the sun which has been diffused through the sky. Even on a cloudy day, when the sun is not visible, a room will continue to be lit with light from the sky. This is diffuse daylight. Diffuse daylight calculations should be undertaken to all rooms within domestic properties, where daylight is required, including living rooms, kitchens and bedrooms. The BRE guide states that windows to bathrooms, toilets, storerooms, circulation areas and garages need not be analysed. These room types are non-habitable and do not have a requirement for daylight.
175. The BRE guideline tests undertaken for this daylight assessment are the Vertical Sky Component (VSC) and No Skyline (NSL). The VSC test calculates the angle of vertical sky at the centre of each window and plots the change between the existing and proposed situation. The target figure for VSC recommended by the BRE is 27%, which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE also advises that VSC can be reduced by about 20% of its original value before the loss is noticeable. In other words, if the resultant VSC with the new development in place is less than 27% and/or less than 0.8 times its former value, then the reduction in light to the window is likely to be noticeable.
176. The distribution of daylight within a room can be calculated by plotting the NSL. The NSL is a line which separates areas of the working plane that do and do not have a direct view of the sky. Daylight may be adversely affected if, after the development, the area of the working plane in a room which can receive direct skylight is reduced to less than 0.8 times its former value.

BRE sunlight tests

177. The BRE sunlight tests should be applied to all main living rooms and conservatories which have a window which faces within 90 degrees of due south. The guide states that kitchens and bedrooms are less important, although care should be taken not to block too much sunlight. The tests should also be applied to non-domestic buildings where there is a particular requirement for sunlight. The BRE guide states that sunlight availability may be adversely affected if the centre of the window:
- receives less than 25% of annual probable sunlight hours, or less than 5% of annual probable sunlight hours between 21 September and 21 March and
 - receives less than 0.8 times its former sunlight hours during either period and
 - has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours.

Overshadowing

178. Section 3.3 of the BRE guidelines describes the method of assessment of the availability of sunlight within garden/amenity spaces. This relates to the proportion of shading on March 21st. The BRE criteria for gardens or amenity areas are as follows, 'It is recommended that for it to appear adequately sunlit throughout the year, at least half of a garden or amenity space should receive at least two hours of sunlight on 21 March. If as a result of a new development an existing garden or amenity space does not meet the above, and the area which can receive two hours of sunlight on 21 March is less than 0.8 times its former value, then the loss of amenity is likely to be noticeable.'
179. The closest properties to the development consist of a mix of residential and commercial buildings. These properties are:
- 209-225 Ilderton Road,
 - 60a and 62 Hatcham Road/134-140 Ilderton Road
 - 179 Ilderton Road (Atar House)
 - 180 Ilderton Road
 - 227-255 Ilderton Road
 - Surrey Canal Site (London Borough of Lewisham)

Image: Plan demonstrating subject site (Pink), consented context (Blue), and built context (Grey)



Impacts

209-225 Ilderton Road

Image: Context of 209-225 Ilderton Road to subject site



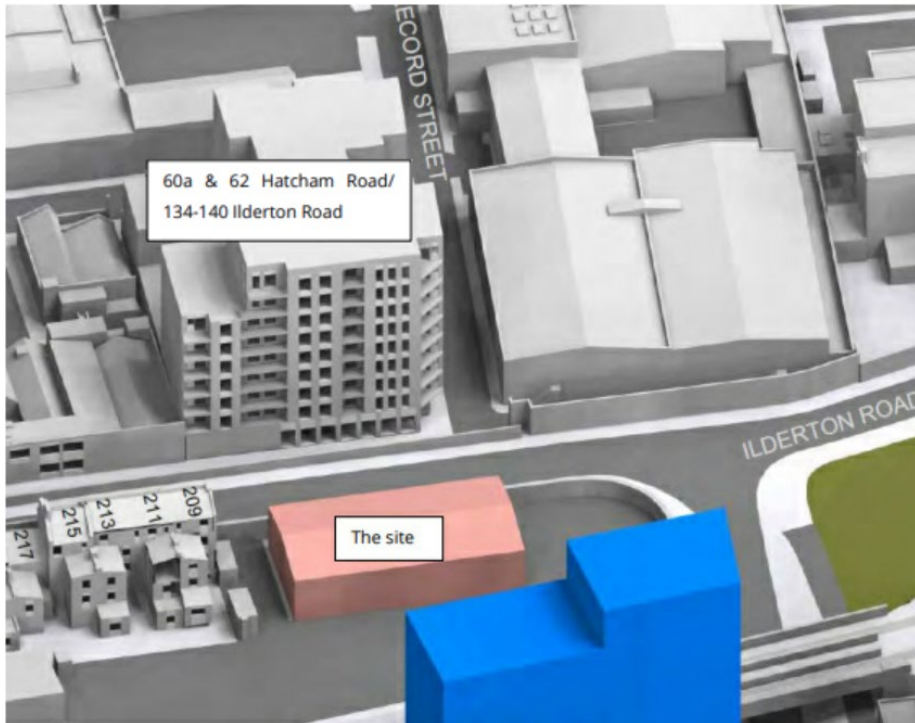
180. The existing VSC values are reflective of the above image, with unobstructed values in the region of circa 25%VSC-30%VSC. The self-constrained areas (i.e., adjacent the rear extensions) by contrast record circa 5%-15% VSC, reflective of their obstructed locations.
181. Post-development, 36 of the 45 windows analysed (i.e., 80%) would either retain in excess of the default BRE targets or experience no noticeable change from their baseline VSC figure. Of the nine remaining windows, seven are located at 209 Ilderton Road, the end terrace house with an unusually open outlook across the site adjacent discussed above. One is understood to serve a bathroom, and on this basis can be disregarded given its non-habitable room. The remaining six are all located in the rear section of the property, overlooking the site.
182. Post-development, the retained VSC values for these six windows would be comparable to the neighbouring houses in the terrace of similar design but which do not have the unusual open aspect across the site, but rather face their neighbouring rear extension. The change from this unusually high baseline would inevitably be noticeable; however, the retained values are considered acceptable. The remaining two windows not meeting the default BRE recommendations are located in the self-obstructed area to the rear of 213 Ilderton Road, where small absolute/ shift changes record as misleadingly high percentage differences. The two rooms served by these windows feature a second, unaffected window which means internal conditions are less affected and therefore the effects are considered acceptable.
183. Regarding NSL tests undertaken, the results showed a very similar pattern as the VSC results with 34 of the 36 habitable rooms analysed, equating to 94% of rooms, showing either none or unnoticeable changes post-development. The two habitable rooms

recording potentially noticeable changes are both located in the side elevation at 209 Ilderton Road directly on the boundary with the site and are understood to be served by one window facing towards it. The change to bedroom R1/104 is circa 10% absolute NSL, translating to a percentage difference of 24.69%. This is slightly above the 20% at which the BRE considers changes may become noticeable. Given its use and retained value the effect is considered acceptable.

184. The remaining room is annotated R1/105 in the assessment drawings within the daylight/sunlight report. As demonstrated, this is a living area which we understand has been subdivided from the original larger room to provide a separate kitchen. This has had the effect of this room being served by a single window, which is located directly on the site boundary and overlooking the unusually low-rise massing presently occupying it, a situation in which the BRE predict a greater degree of change is inevitable.
185. The design in this area has been carefully considered, resulting in an immediate scale/outlook comparable to the neighbouring terraces which have the more usual side extension to side extension arrangement. The design also includes for an area of new planting between the terrace and the covered yard and a generally improved outlook when compared to the current one i.e., an attractive and robust brick building with the majority of activity contained within. On balance, it is therefore considered that the effect is acceptable.
186. Regarding sunlight impacts, given the location of the proposed development to the north of the terrace, the analysis demonstrates no material change to existing APSH values.

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

Image: Context of 60a and 62 Hatcham Road /134-140 Ilderton Road to subject site



187. The potentially affected site adjacent to the subject site is currently in the final stages of completion. To assess the likely impact on other proposed new developments where detailed internal layout are available and window positions are finalised, the BRE Guidelines state that the Average Daylight Factor (ADF) test is most appropriate. ADF provides an absolute measure of daylight expressed as a ratio of daylight for the room in question as a proportion of the daylight outside at any moment in time. The ADF for a living room should be above 1.5% (i.e. the room should enjoy a minimum of 1.5% of the average external daylight at any moment in time), whilst that for a bedroom and kitchen should be in excess of 1% and 2% respectively.
188. The assessment detailed has shown that the most at risk properties to potential daylight loss are located on the lower floors levels of the residential accommodation facing the subject site, namely floors 1 and 2. The assessment demonstrates that the ADF values in the scenario for the four combined living/kitchen/dining (LKD) areas facing the site ranged from 0.2%ADF to 1.7%ADF, all below the default BRE/BS target. The four bedrooms are served by windows solely facing the site and their results ranged from 0.6%ADF to 1.3%ADF. As such, one habitable room (an unobstructed bedroom) met the default recommendation.
189. In the proposed condition, the four living areas would achieve comparable ADF values when compared to those consented, ranging from 0.81%ADF to 1.22%ADF. In particular, the consented value for the lowest LKD as shown above would significantly improve from 0.2%ADF to 0.81%ADF. This pattern continues for the rest of the elevation facing the site, with the retained proposed ADF values being comparable

with the consented in general and also significantly improving the lowest ones. Given the above assessment it is therefore considered that the proposed ADF values are acceptable.

190. Also undertaken for this daylight assessment on the potentially affected properties was the NSL methodology. The assessment demonstrated that of the 90 habitable rooms facing the site, 52 (i.e., 58%) would achieve the default BRE recommendations post development. When taking into account the context and design of the façade assessed, this is a high overall value. The remaining 38 rooms are comprised of 24 bedrooms (i.e. 63%) and 14 combined LKD rooms. The BRE guidance sets out that NSL to bedrooms is less important, given their mainly night-time use. Retained NSL values for the LKDs are due to their design, whereby they are served by a single window and over 5m in depth. Paragraph 2.2.10 of the BRE guidance states that *“if an existing building contains rooms lit from one side only and greater than 5m deep, then a greater movement of the no sky like (NSL) may be unavoidable.”* It is therefore considered that the retained NSL values are acceptable.
191. The potentially affected windows serving this property are orientated due east. Therefore any dwellings would not have any reasonable expectation of sunlight amenity aside from a certain point of the day, in this case the morning, and were not assessed, in line with the BRE guidance.

179 Ilderton Road (Atar House)

Image: Context of 179 Ilderton Road (Atar House) to subject site which is located to the south out of view



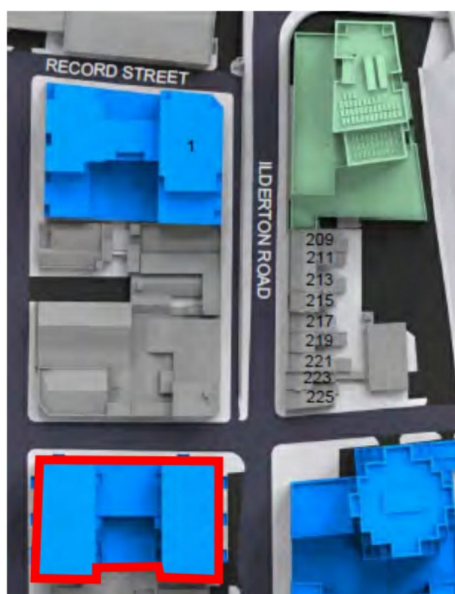
192. Atar House is located directly to the north of the site, across Pat Hickson Gardens. As seen in the image above, the elevation facing the site features recessed windows understood to serve living areas. These are obstructed both above and beside the window. In these types of situations, the BRE predict their default guidance may not be possible to achieve. Post-development of the subject site, 41 of the 47 windows analysed (i.e., 87%) would either retain in excess of the default BRE targets or

experience no noticeable change from their baseline VSC figure. The six remaining windows are all located in the recessed areas discussed above, where they record materially lower baseline VSC values as a result.

193. As predicted in the BRE guidance, small absolute/ shift changes of circa 2%VSC would be expressed as misleadingly high percentages of over 20%. Whilst these can signal noticeable differences when applied to higher VSC values, the actual change between the existing and proposed VSC values for these windows is sufficiently small to be considered a “no-worsening” of the baseline. Given the results for unobstructed areas directly adjacent, it can be concluded that if an alternative “without balconies” assessment was to be undertaken for these 6 windows, it would demonstrate that their recessed nature is the main contributor to the percentage changes recorded, particularly considering the distance between the flank elevation of this site and the subject site.
194. The NSL results take into account conditions within rooms served by more than a single window and these all showed either none or small, imperceptible changes post-development.
195. Regarding sunlight impacts, the two bedrooms, located in the self-obstructing recessed areas of the elevation mentioned above, would experience slightly greater than 20% change to their existing APSH, again this is because the existing values are very low due to their design. Small actual/ shift changes in APSH therefore result in misleadingly high percentage value changes. As set out in the BRE guidance, the overall annual loss of APSH for these two bedroom windows is no greater than 4% and therefore will not be adversely affected.

180 Ilderton Road

Image: Context of 180 Ilderton Road (outlined in red) to subject site (green)



196. Given the distance of the development from the subject site, the VSC façade renders confirmed retained VSC values on the extant consented potentially affected facades would range between 30%VSC- 35%VSC in unobstructed areas.
197. In terms of the sunlight test, the potentially affected facades at 180 Ilderton Road are orientated due north. Therefore any dwellings would not have any reasonable expectation of sunlight amenity and were not assessed, in line with the BRE guidance.

227-255 Ilderton Road

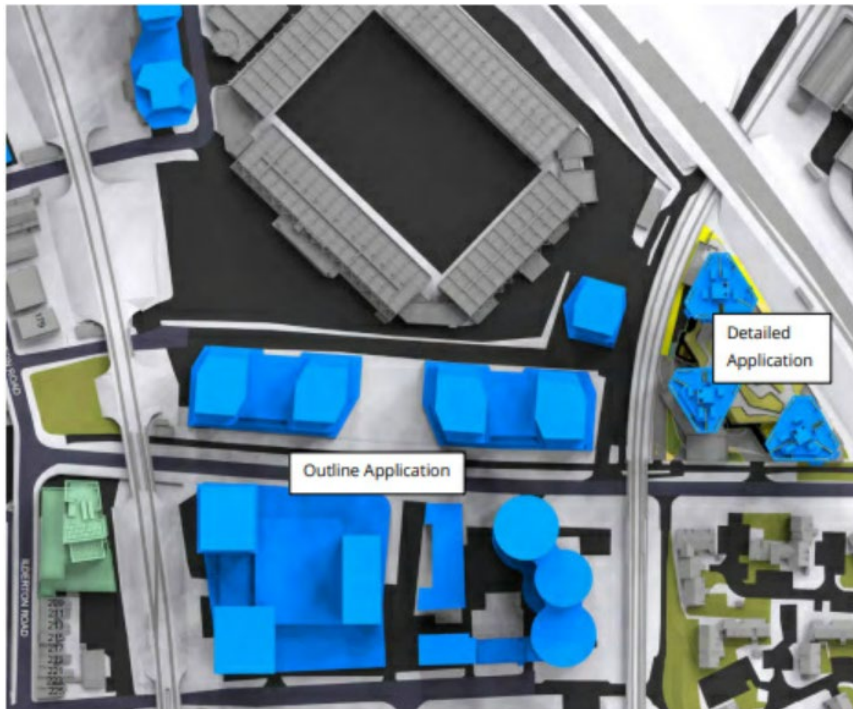
Image: Context of 227-255 Ilderton Road (outlined in blue) to subject site (green)



198. Much like with the findings from the assessment undertaken on the impacts at 180 Ilderton Road, the VSC façade renders confirmed retained VSC values on the extant consented potentially affected facades would range between 30%VSC- 40%VSC.
199. In assessing any sunlight impacts, the potentially affected facades of the consented 227-255 Ilderton Road scheme are orientated due north. Any dwellings located here would not have any reasonable expectation of sunlight amenity and therefore were not assessed.

Surrey Canal Site (London borough of Lewisham)

Image: Context of Surrey Canal Site (blue) to subject site (green)



200. It is acknowledged that the closest part of the Surrey Canal redevelopment is in outline, and would be located to the rear of the subject site. Notwithstanding this, VSC tests were undertaken. The VSC façade renders confirmed retained VSC values on the extant consented potentially affected facades would range between 25%VSC-40%VSC. As such, the proposed development would not prevent adequately lit dwellings to be designed here.
201. Regarding sunlight impacts, the potentially affected facades are orientated west, therefore subject to the same considerations set out above, i.e. that any dwellings placed here are likely to be considered insufficiently sunlit given the lack of a more southerly orientation. Notwithstanding this, APSH façade renders confirmed retained APSH values would range between 20%APSH- 40%VSC. Therefore, the proposed development would not prevent adequately sunlit dwellings to be designed.

Overlooking of neighbouring properties

202. In order to prevent harmful overlooking, the Residential Design Standards SPD requires proposed developments to achieve a distance of 12m between the front elevations of buildings and/or across a highway, and a minimum of 21m between rear elevations.
203. The subject site sits on a corner plot at the junction of Surrey Canal Road and Ilderton Road. Therefore the most at risk property for potential overlooking impacts is the adjacent development at 60 and 62A Hatcham Road/134-140 Ilderton Road. This site sits across the highway from the subject site. The existing distance between the front

elevation of 60 and 62A Hatcham Road/134-140 Ilderton Road is circa 20 metres. Given that the proposed development would be setback slightly from the current building line of Jewson, the distance will exceed the minimum separation distance of 12 metres as set out in Southwark's SPD.

TRANSPORT CONSIDERATIONS

204. Policy P50 'Highways impacts' of the Southwark Plan 2022 seeks to ensure that developments minimise the demand for private car journeys. In addition, the policy requires developments to demonstrate that the road network has sufficient capacity to support any increase in the number of the journeys by the users of the development, taking into account the cumulative impact of adjoining or nearby development. As this is a Southwark council application and therefore any requirements will be contained in the unilateral undertaking.
205. In assessing this application from a transport perspective, the site is located in an area that the council is considering pedestrian, and cycle changes to enable healthy streets. The proposals will not prevent these plans being delivered.
206. Southwark have recently adopted their Movement Plan, a people, place and experience approach to transport planning rather than a modal one. This application has been assessed on how it will contribute to the 9 Missions.
207. The Mayors Transport Strategy (MTS) Mayors Transport Strategy (MTS) includes three strategic challenges that are of significant importance to assessing this application.
- Good Growth
 - New homes and jobs
 - A good public transport experience
208. The submitted Transport Assessment (TA) is considered to provide an adequate appraisal of the relevant transport and highway related matters including an assessment of the potential for journeys to be made by sustainable modes of transport as well as detailed estimates of vehicular trips resulting from the development.
209. Officers have reviewed this application and identified the following areas for detailed comments:
- Access and Road Safety – The safe movement of all modes entering and exiting the public highway
 - Trip Generation –The existing and proposed trips related to the site
 - Servicing and Delivery – How the development will manage the vehicular trips required
 - Car Parking - How the development will manage the vehicular trips required
 - Public Transport – Current access and future potential
 - Active Transport – Walking and cycling and behaviour change

Existing site layout

210. The site is located along the eastern side of Ilderton Road. The site is bound by Surrey Canal Road to the north, Ilderton Road to the West and Rollins Street to the South and the Railway line to the East. At present the site includes a builders' merchants with vehicular access from Rollins Street. Surrey Canal Road provides access into the London Borough of Lewisham and accommodates a Cycle path to the northern side of the road. Rollins Street is a 300m long cul-de-sac, which provides a pedestrian/cycle access only from its terminus to the residential area to the east. Due to the proximity of Millwall Stadium on match days there are a lot of extra vehicle movements in the area. The rear of the site is bounded by the railway line.

Proposed site layout

211. The proposed future site layout will increase footway widths improving the pedestrian movement along Ilderton Road. The proposed access arrangements and loading bay will be detailed up as part of the S278 agreement. The Council programme for the CPZ includes this area and subject to consultation will be implemented within the next two years. The Council is introducing improved cycle routes from Rotherhithe to Peckham, this proposal does not impede on that project. The traffic management related to the site separates residential movement and industrial vehicle movement. Residential vehicular movement will be restricted to the entrance at Surrey Canal Road with commercial vehicular access focused from Rollins Street. A Condition requirement for the detailed design of the landscaping and public realm will ensure secure by design and road safety is fully considered.
212. The proposal included tracking of the yard access and residential access ensure sufficient swept paths for a variety of vehicle sizes. All works within the extent of the S278 for Southwark will be done in accordance with Southwark Street Design Manual SSDM and TfL's Healthy Streets design guidance. A condition requirement for the detailed design of the landscaping and public realm will ensure secure by design and road safety is fully considered.

Trip generation

213. The proposed scheme will generate largely sustainable methods of trips, and the TA estimates servicing demand for the 22 motorised vehicular trips per day.

Servicing and delivery

214. Delivery and servicing for the residential element of the scheme will be located in a servicing area located off of Surrey Canal Road. It has been agreed with Southwark Transport and Highways officers that access to this servicing area is to be explicitly signed as "left-in left-out" only, covered by a Traffic Regulation Order, and funded by the applicant. This is considered to be an appropriate mitigating factor to relieve potential traffic issues on Surrey Canal Road in line with comments made by Lewisham Borough on this arrangement.

215. As part of the proposals the completed site will be supported by a concierge / management team and it is proposed that this Concierge along with the Travel Plan Co-ordinator will act as the co-ordinator of this Delivery Service Management Plan (DSMP). As part of their duties the Concierge will manage and control the flow of delivery and servicing vehicles to the dwellings which will be managed through the use of a booking system for all residents.
216. The booking system shall be limited to allow for only one delivery to occur within an allotted 10 minute time slot. This would limit and manage the use of the loading bay where possible. It will also be the duty of the Concierge to include within the booking system the times of regular delivery and servicing arrivals, such as postal and refuse vehicles. The Concierge will store handheld sized non-food goods for residents in the event they are not at home when a delivery is made with larger goods returned to the depot. Deliveries by supermarkets will not be accepted by Concierge.
217. In order to ensure that on-street servicing and deliveries do not negatively impact on the highway network, the Council is recommending that applicants in the Old Kent Road Opportunity Area enter into Delivery Service Plan Bonds against their baseline figures for all daily servicing and delivery trips. These bonds would be calculated at £100 per residential unit and £100 per 500 sqm of non-residential floor space. In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, this is not intended as a financial penalty, but as a means of mitigating any harmful impacts from the proposed development and ensuring a better quality of life for current and future residents. As such, it is considered to meet the CIL Regulation 122 test, in that it would be:
- (i) necessary to make the development acceptable in planning terms;
 - (ii) directly related to the development; and
 - (iii) fairly and reasonably related in scale and kind to the development
218. The proposal is for the concierge / management of the new development to monitor the daily vehicular activity of the site for both commercial and residential accommodation, quarterly for a period of 2 years from 75% occupancy. If the site meets or betters its own baseline target the bond will be returned within 6 months of the end of the monitoring period. If the site fails to meet its own baseline the bonded sum will be made available for the council to utilise for sustainable transport projects in the ward of the development. It is also noted that the commercial deliveries to the development will follow the existing arrangements currently in place for Jewson.
219. All uses in the development will be subject to a condition on the marketing and promotional material related to the work to ensure this is explicit in how the development has been designed to discourage private cars and encourage sustainable living, working and visiting. In addition, a final DSMP is secured by condition and attached to this decision notice.

Car parking

220. The residential element of the development will be car free, excluding the provision for three blue badge spaces with electric charging points. The strategy for disabled parking provision has been based on pre-application consultation with Southwark officers and is designed to accommodate predicted need and be flexible given the

quantum of development within the area and the wish to avoid the over provision of on street disabled parking spaces which have or will be provided by adjacent developments.

221. The commercial aspect of the development will retain 8 existing car parking spaces. Given the nature of the business which sells wholesale building materials, a level of car parking is required to enable customers to transport their purchases from the site. To adhere to the principles of sustainable methods of transport, Electric Vehicle Charging Points are to be conditioned to be installed in the commercial car parking area to encourage customers in their use of transportation. There will be a S106 obligation that prevents residents and office users of the proposed development from obtaining resident parking permits.

Public transport

222. The site is served directly by local bus route P12, and is within 600m of the junction with Old Kent Road where more bus services are located. The nearest rail station to the site is South Bermondsey Station which is located circa 415m north of the site, or a 7 minute walk. As a borough Southwark agrees with TfL that bus services will need to be increased in the area ahead of the BLE to accommodate the demand generated by additional homes and jobs generally in the Old Kent Road area. The requirement for TfL to provide evidence to prove both previous contributions has been spent appropriately and the evidence for the further draw is the fairest way this could be managed. The proposal is that there is a maximum cap for TfL to call on which is £2,700 per unit.

Active transport

Walking and public realm

223. The TA does include an Active Travel Survey. The development is located nearby to Bramcote Park, Bridgehouse Meadows in the London Borough of Lewisham, and adjacent to Pat Hickson Gardens and further across Southwark. The application has increased the footway width of Ilderton Road this will be delivered through the S278 agreement.

Cycling

224. The site is located close to Quietway 1 which links Greenwich with the West End. In addition, there are a number of cycle routes within close proximity to the site. These routes provide useful connections to key public transport interchanges, such as South Bermondsey, Elephant and Castle and London Bridge. Cycle parking will be provided in line with the London Plan 2021 standards. The proposals will provide 322 secure and covered cycle parking spaces for residents, which will be provided as a mix of Sheffield stands and stacked stands. 6 short-stay cycle spaces are also proposed and will be located at the entrance from Surrey Canal Road. The commercial element proposes 8 long-stay spaces and 4 short-stay spaces. The long-stay cycle parking will be located within a shelter in the external yard, with short-stay spaces in the public realm in front of the residential blocks on Surrey Canal Road, close to the workspace

entrance. A condition is attached to this decision required detailed design of the cycling parking provision. The S106 Agreement will include a contribution towards the delivery of a new Cycle Hire Docking station of £50 per residential unit.

Construction

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

Conclusion on transport

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

ARCHAEOLOGY

227. The site is within the 'Bermondsey Lake' Archaeological Priority Zone (APZ), which is designed to protect the palaeological environment and prehistoric archaeology recovered from the shoreline and relict fills of the large Late Glacial Bermondsey Lake and the associated riverine geology and topology. The site is also close to the 'Old Kent Road' APZ, which has the potential to contain features associated with the former route of 'Watling Street', the major Roman road between London and Canterbury. When the New Southwark Plan is adopted, the site will lie within the newly extended 'North Southwark and Roman Roads' Tier 1 Archaeological Priority Area (APA).
228. Policy P23 of the Southwark Plan 2022 requires that applications affecting sites within Archaeological Priority Areas (APAs) will be accompanied by an archaeological assessment and a report on the results of a field evaluation of the site, including an assessment of the impact of the proposed development on the archaeological resource.
229. A Desk-Based Assessment by BWB consulting has been submitted as part of this application. Southwark's Archaeologist has reviewed the DBA and raises no objection to the development given that the DBA adequately summarises the archaeological potential of the site. Southwark's Archaeologist recommends conditions requiring an archaeological evaluation, subsequent mitigation works and foundation design should be applied to the decision notice. In addition, any site investigation should be monitored by suitably qualified archaeologists. Much of the archaeological interest of this site comes from geoarchaeological deposits whose presence can be identified through monitoring of such works.

AVIATION

230. The National Air Traffic Safeguarding Office (NATS) were consulted on the development, but at the time of writing, have not responded to the consultation request.

TV AND RADIO SIGNALS

231. Arqiva own and operate the UK Terrestrial Television Broadcast network and supply the Freeview platform. They also own and operate 90% of the UK Radio Broadcast network, through which they broadcast the full range of BBC and commercial radio stations. In addition, many sites that they own or manage are shared by other operators, such as BT, the Mobile Network Operators, Airwave (Emergency Services Networks), roadside services and Central and Local Government departments and agencies.
232. Arqiva did not respond to a consultation letter regarding the development sent on 14/09/2021. It is therefore considered that Arqiva do not have an objection to the proposed development.

ENVIRONMENTAL CONSIDERATIONS

Refuse and waste

233. A Waste Management Strategy has been submitted with the application which outlines the waste proposals over all phases of the development. The waste generation metrics used in this Strategy are based on Southwark's Waste management guidance notes for residential developments.
234. Each block will have a separate refuse store that is located on the lower ground floor. The quantity of bins has been calculated following Southwark's waste management policy with each residential core having level access from the lifts to the refuse stores at this level. Bin stores will be monitored over the course of the week by on-site building management and will be rotated should bins at the front of the store become full. Bulky refuse storage has also been included adjacent to the bin stores.
235. Due to the level changes on the site between the lower ground floor and Ilderton Road, a management strategy will be in place for on-site staff to move the refuse bins to the kerb side on collection day via a platform lift with a travel height of 800mm. Refuse will be collected from Ilderton Road as refuse vehicles already stop on this section of road for collections from the neighbouring terraces.
236. Southwark Waste Management Officers and Highways Officers have raised concerns over the presentation of bins on the public highway. In acknowledging these concerns, it must be stated only the residential refuse will be collected from the street, and will be a once-a-week operation. The commercial waste will be collected from the external

yard of Jewson. Taking into consideration the constraints of the site, it would not be possible to create a loading bay within the development itself for refuse vehicles. Additionally, the residential waste collection is unable to be collected from the external yard as Jewson requires their operations to be separate for liability purposes.

237. Furthermore, as the redevelopment of the site includes the widening of the footway along Ilderton Road, this will enable the bins to be accommodated at the back of the footway. As part of the management strategy, the concierge will ensure that the bins are ready for collection in advance of the refuse vehicle arriving. This will include moving the bins from the bin store and then placing them at the back of the widened footway. These will then be returned to the refuse store as soon as the collection is completed. The current footway width will therefore be maintained at all times.

Wind and microclimate

238. The report demonstrates that the meteorological data for the subject site shows prevailing winds from the southwest quadrant throughout the year with the secondary winds being predominantly from the direction of northeast that are more prevalent in the spring months. The baseline scenario, contained within the report as Configuration 1, assesses the wind condition of the existing site. The results indicate that there are no instances of strong winds that would amount to any safety concerns for pedestrians.
239. Configuration 2 within the report focuses on a pre-mitigated scenario which demonstrates that there would be unsuitable wind conditions both at ground and upper-level areas of the proposed development which includes thoroughfares, amenity spaces, balconies, and entrances. Furthermore, there would be strong winds with a potential for safety concerns at a thoroughfare in the northwest corner of the building, the three amenity spaces on the 8th floor terrace, and balconies between the 4th and 7th floors, and 12 to 21 floor levels on the southwest corner, and balconies between the levels 12 and 23 at the northwest corner. The findings demonstrate that these locations would require mitigation measures to ensure a safe wind environment for pedestrian, cyclists and residential occupiers.
240. Taking into consideration the potential harm above, mitigation measures in the form of landscaping measures including shrubs/hedging or dense planting to a height of 1.5m to be located at the south of seating areas within the development. Additional mitigation measures include 50% porous balustrade 1.1m in height to balconies potentially affected, and a full height 50% porous screen between the column and façade at the northwest corner, at the undercut of the building. With the proposed landscaping scheme and wind mitigation measures in place (Configuration 4), all locations within and around the proposed development would have suitable wind conditions for the intended use. There would also be no instances of strong winds with potential for safety concerns.

Fire strategy

241. Policy D12 of the London Plan 2021 expects all development proposals to achieve the highest standards of fire safety and to this end requires applications to be supported by an independent Fire Strategy, produced by a third party suitably qualified assessor.

242. A fire statement form and fire safety strategy by Jensen Hughes has been submitted with this application. The strategy demonstrate how the development would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. The provision of a suitably-sized evacuation lift in the residential core is also proposed in line with Policy D5 of the London Plan. The measures contained within the statements are secured by condition within the decision notice. GLA Officers and London Fire Brigade Officers have reviewed the submitted Fire Statement and Strategy, and raise no objection to the information within the document.

Flood Risk and water resources

243. The application site is located within Flood Zone 3 of the River Thames which is tidally influenced at this location, although in an area shown to be benefiting from existing flood defences. Flood Zone 3 is classified as comprising land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%) or a 1 in 200 or greater annual probability of tidal flooding (>0.5%). Flood defences are indicated to be in good condition and afford the Site a standard of protection up to the 1 in 1000 year event.
244. The Environment Agency (EA) has reviewed the submitted information in relation to flood risk and has no objection to the proposed development.
245. The site is currently wholly developed comprising two existing Jewson buildings and an external service yard. The development proposals will aim to reduce the peak run-off rates from the site to as close to the greenfield runoff rates as is feasible. The Council's Flood Risk Team has reviewed the revised Sustainable Drainage Statement and 24.0l/s is acceptable, based on the runoff being reduced to 1.5l/s and the remaining site area (0.102ha) being discharged at 22.5l/s. This results in an improvement on the existing runoff rates currently on site. A pre-commencement condition has been attached to the decision notice seeking full details of the proposed surface water drainage system incorporating Sustainable Drainage Systems (SuDS). A pre-occupation condition seeking a Drainage Verification Report is also attached to the decision notice.

Ground conditions and contamination

246. A Phase 1 Environmental Study has been undertaken by BWB Consulting. The study has found that the site has been utilised as a wharf, timber yard and a builder's yard in the north and central area and for residential housing for a small period of time in the south. Above ground storage tanks have also been present in the north east and a sunken petrol tank in the centre of the site. The surrounding land has undergone extensive development of both industrial and residential purposes including various works, railways, factories and depots.
247. The ground conditions at the site are anticipated to comprise varying thicknesses of hardstanding over superficial deposits of Alluvium and the Kempton Park Gravel Member, overlying a small strip of Thanet Formation bedrock in the south beneath which is the Lewes Nodular Chalk Formation. Made Ground is anticipated to be present on site due to historical developments in the south and an infilled canal along

the northern boundary. Additionally, significant potential pollutant linkages have been identified, such as the infilled canal, unspecified tanks, underground fuel storage tanks, and timber yard on site which have the potential to have an impact on site.

248. Southwark's Environmental Protection Team (EPT) has reviewed the Phase 1 assessment and following review recommends that a Phase 2 site intrusive investigation is undertaken before any works commence on site. The recommended condition is attached to the decision notice.
249. The Environment Agency have reviewed the proposals in relation to contaminated land and made the following recommendation.
250. "The 'Phase 1 Geo-environmental Assessment and Geotechnical Risk Register' by BWB (dated December 2021, ref.JIR-BWB-ZZ-XX-RP-YE-0001_PH1_P2 rev.P03) in support of this planning application, provides us with confidence that it will be possible to suitably manage the risk posed to controlled waters by this development. Further detailed information will however be required before built development is undertaken."

Air quality

251. The subject site is located in the Southwark Air Quality Management Area which is designated for the potential exceedance of the annual mean nitrogen dioxide (NO₂) and daily mean PM₁₀ air quality objectives. Southwark Plan Policy P65 'Improving air quality', states that development should address the impacts of poor air quality on building occupiers and public realm users by reducing exposure to and mitigating the effects of poor air quality.

An Air Quality Assessment compiled by BWB Consulting has been submitted with this application. The assessment concludes that pollutant concentrations are predicted to be below the relevant air quality objectives and the proposed development, once operational, will be better than air quality neutral. Mitigation measures are recommended to reduce the potential for temporary dust impacts during construction. Southwark's EPT Officer has reviewed the AQA and raises no objection to the information contained within the assessment.

Noise and vibration

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

Agent of change

253. Where new noise- and other nuisance-generating development is proposed close to residential and other sensitive uses, Policy D13 of the London Plan 2021 requires the proposal, as the incoming 'agent of change', to be designed to mitigate and manage any impacts from existing sources on the future users/occupiers. Developments should be designed to ensure that established noise and other nuisance-generating uses remain viable and can grow without unreasonable restrictions placed on them.
254. To the northwest of the subject site is an existing scaffolding yard and waste operation adjacent past the railway line. The impact of these sources has not been assessed in accordance with BS4142. The monitoring conducted was automated and hence it is not clear what impact these commercial/industrial sources may have.
255. EPT Officers have reviewed the information, and in respect of Agent of Change principles, have recommended that an acoustic survey will need to be undertaken for existing noise in industrial areas. This is to be secured by condition before acoustic details are agreed, and the condition is attached to this decision notice. In attaching this condition to the decision notice, the development will not prejudice the potential future redevelopment of the adjoining site and thereby complies with London Plan Policy D13.

SUSTAINABLE DEVELOPMENT IMPLICATIONS

Energy

256. Policy SI2 of the London Plan requires major developments to provide an assessment of their energy demands and to demonstrate that they have taken steps to apply the Mayor's energy hierarchy. Policy SI3 require consideration of decentralised energy networks, Policy SI4 deals with managing heat risk and Policy SI5 is concerned with protecting and conserving water resources and associated infrastructure.
257. Policy P70 of the Southwark Plan sets out the borough approach to ensuring that new developments tackle climate change. The approach is generally consistent with London Plan Policies but also requires new commercial developments to meet BREEAM 'Excellent'. The policy also states that residential developments must reduce carbon emissions on site (100% on 2013 Building Regulations). Southwark Council's carbon offset cost is £95 for every tonne of carbon dioxide emitted per year over a period of 30 years. This is the equivalent of £2,850 per tonne of annual residual carbon dioxide emissions.
258. An Energy Assessment and Sustainability Strategy based on the GLA energy hierarchy has been submitted by the applicant. This details how the targets for carbon dioxide emissions reduction are to be met. A combination of 'Be Lean' 'Be Clean' and 'Be Green' measures have been employed in an attempt to achieve the reduction in line with the GLA guidance on preparing energy statements, Southwark Plan Policy P70, and the Southwark Sustainable Design and Construction SPD.

Be Lean (use less energy)

259. For this stage the proposed development achieves a 29% reduction below the baseline site-wide. This represents a 35% reduction for domestic areas and a 15% reduction for the non-domestic areas using SAP10. The London Plan target for a 10% reduction from Be Lean measures has therefore been achieved for the domestic areas.
260. The Non-domestic areas exceed the London Plan Be Lean target of 15%. This is due to the large thermal envelope and the impact of energy efficient lighting, which represents a large proportion of the energy demand for these areas.

Be Clean (supply energy efficiently)

261. Having minimised the demand for energy, the energy systems have been selected in accordance with the hierarchy for selection:
- I. Connect to an existing decentralised energy network; then
 - II. Be future-proofed to connect to a planned decentralised energy network; or
 - III. Implement a site-wide low carbon communal heating system; and
 - IV. Explore and evaluate the potential to oversize the communal heating system for connection and supply to adjacent sites and, where feasible be implemented.
262. The SELCHP DHN is operated by Veolia, and preliminary discussions have taken place with the applicant, and are ongoing with the operators about the potential to connect to this network, with Veolia confirming that Ilderton Road is an area where a plan to install a DHN in the coming years. The strategy for the development is therefore to connect to this DHN.
263. In the interim, a strategy has been proposed that incorporates a communal Air Source Heat Pump (ASHP) system into the development. The heat load profile of the residential units is favourable, and in the short term this site-wide low carbon communal heating system will provide the best carbon savings over a purely gas boiler system. Furthermore, the communal ASHP system will be future proofed in order to connect to the SELCHP network when it is available.
264. The proposed communal ASHP heating system, supplying both space heating and domestic hot water supply to all units, produces a 37% carbon reduction for the Domestic assessment and a 1% reduction for the Non-domestic areas, resulting in an overall site-wide carbon reduction of 35% at the Be Clean stage. It is noted that once connect to the SELCHP DHN is enabled, the carbon reduction savings will substantially increase.

Be Green (Low or Carbon Zero Energy)

265. The current proposal for the development is to maximise available roof space for the provision of solar Photovoltaics (PV). There is limited roof space due to the massing of the building, with a small footprint relative to the building height, however, space

has been identified for solar PV provision. It is expected that a c. 16.3 kWp array could be mounted when considering shading and access between panels. The specified solar PV panels would be highly efficient market leading solar panels.

266. It is proposed that a VRF/ASHP system will function as the primary means of providing heat energy for space heating plus cooling energy for summertime comfort cooling needs for the commercial spaces. In addition to the carbon savings delivered by such a system, this proposal also has the advantage of a single system providing both heating & cooling, with benefits in terms of cost and space. The VRF/ASHP type system proposed also produces no at-source emissions, which benefits air quality in the local environment.
267. The proposed implementation of low and zero carbon technologies, a combination of solar PV serving the units, and a VRF/ASHP system for the commercial spaces, provides an overall site-wide carbon reduction of 2% - comprised of a 2% carbon reduction for the Domestic areas, and a 5% carbon reduction for the Non-domestic areas.

Energy conclusion

268. The development adheres to the energy hierarchy, heating hierarchy and cooling hierarchy. The systems specified represent the best available for the development to save carbon while future proofing to allow connection to the proposed SELCHP DHN, should this become possible in the future. The PV system is the largest that the roof can accommodate. The development will further achieve 'zero carbon' through an offset payment in line with the London Plan and Southwark guidance. Overall carbon savings over the notional Part L baseline represents a 66% carbon reduction, well in exceedance of the 35% and 40% minimum reduction mandated by the GLA and Southwark, respectively.
269. As the development is unable to achieve the full 'Zero Carbon' target on site a contribution to the Borough's carbon offset fund will be required. The domestic elements carbon shortfall per annum amounts to £155,053, with the non-domestic element of the scheme resulting in a shortfall contribution of £28,539. The overall contribution to be secured in the S106 Agreement is £183,592. The S106 Agreement will also include the obligation of requiring the development to be constructed in accordance with the Energy and Sustainability Statement submitted with this application.

Overheating

270. London Plan Policy SI4 and Policy P68 of the NSP set out the cooling hierarchy that should be followed when developing a cooling strategy for new buildings. The six-step hierarchy is as follows:
- Minimise internal heat generation through energy efficient design; then
 - Reduce the amount of heat entering the building through the orientation, shading, albedo, fenestration, insulation and green roofs and walls; then
 - Manage the heat within the building through exposed internal thermal mass and high ceilings; then

- Use passive ventilation; then
 - Use mechanical ventilation; then
 - Use active cooling systems (ensuring they are the lowest carbon options).
271. A revised Dynamic Overheating Assessment has been submitted along with this application which details the methodology and findings units and commercial areas within the proposed development undertaken in line with the current London Plan (2021) Policy SI4 Managing Heat Risk. Units have been selected for the overheating assessment based on design characteristics that establish them as representative of the overall proposed scheme. This selection of units includes consideration of varying floors and of different orientations.
272. All units within the development will utilise openable windows as the primary means of ventilation, with a background mechanical ventilation system. Passive measures such as; high energy efficiency, solar controls glazing, and external shading in form of balconies have been explored and adopted as far as practicable to avoid the need for comfort cooling. The performance of the units has been assessed against CIBSE TM59: Design Methodology for the Assessment of Overheating Risk in Homes, and CIBSE TM52 the limits of thermal comfort: avoiding overheating in European buildings.
273. This assessment of units and commercial areas demonstrates that an acceptable overheating risk is achieved. All units tested, demonstrate an acceptable risk of overheating. The results are based on some key design features that follow the London Plan cooling hierarchy. Additionally, representative communal corridors (with and without external openings) have been modelled and demonstrated to pass with mechanical extract.
274. Commercial areas have been shown to fail the CIBSE TM52 criteria following passive design measures, including improved solar control glazing. This is due in part to the necessarily large display windows and opening profiles which are integral to customer access, thus reducing the capacity for natural ventilation and night time purging. As a result, the assessment recommends that active cooling be specified for these areas in order to mitigate overheating. The results confirm that active cooling complies with the CIBSE TM52 criteria. For the residential element, the council's EPT officer has recommended a condition is attached to the decision notice to ensure integral blinds are provided as part of the base construction.

Whole life cycle and carbon capture

275. London Plan Policy SI2 requires a calculation of whole life cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment (WLCA). This captures a development's unregulated emissions, its embodied emissions and the carbon impact of mid-life maintenance and end- of-life dismantling.
276. The submitted WCLA follows the guidance outlined in EN 1578:2011. Calculations have been provided via One Click LCA's 'LCA for BREEAM UK' Tool. The purpose of the BREEAM tool is to evaluate the whole life cycle carbon emissions of the development and make design decisions based on carbon data in order to reduce the life cycle carbon emissions of the building.

277. The results show that Structure, including such materials as concrete and reinforcement) are the biggest contributors to the building whole life global warming score, cumulatively contributing to 62.7% of the total buildings carbon emissions. Actions that have been identified within the WCLA to help reduce the impact of the development in each of the life cycle stages are encouraging.
278. A condition is attached to the decision notice regarding an updated Whole Life-Cycle (WLC) Carbon Assessment demonstrating compliance with Part F of Policy SI 2 - Minimising greenhouse gas emissions of the London Plan 2021. The final wording of the condition will be agreed with the GLA during the Stage 2 process post committee.

Table: WLCA Emission Results compared to GLA benchmarks

	Original Global warming/GIA (kg CO2e)	Proposed Global warming/GIA (kg CO2e)	WLC Benchmark	Aspirational benchmark
A	855	532	750 – 850	450 – 500
B & C (excluding B6 & B7)	394	231	300 – 400	180 – 240

Circular economy statement

279. Policy GG5 of the London Plan 2021 promotes the benefits of transitioning to a circular economy as part of the aim for London to be a zero-carbon city by 2050. Policy D3 requires the principles of the circular economy to be taken into account in the design of development proposals in line with the circular economy hierarchy. Policy SI7 requires referable applications to develop circular economy statements.
280. The submitted Circular Economy Statement demonstrates the sustainability measures incorporated into the design of the development, and outlines the adoption of circular economy principles throughout the design, construction and operation of the proposed development. Through the incorporation of fundamental sustainability principles, the proposed development will:
- Minimise the quantities of materials used;
 - Minimise the quantities of other resources used;
 - Specify and source materials and other resources responsibly and sustainably;
 - Minimise the quantities of materials used;
 - Minimise the quantities of other resources used;
 - Specify and source materials and other resources responsibly and sustainably;
 - Manage demolition waste
 - Manage excavation waste
 - Manage construction waste
 - Manage municipal waste
281. A planning condition requiring a Circular Economy Statement to be agreed in writing by the Council prior to commencement of any works on site. Additionally, a special condition is to be imposed on the decision notice that requires a post completion circular economy report no later than three months following substantial completion of the final residential unit. This report will set out the predicted and actual performance against all numerical targets in the relevant Planning Stage Circular Economy

Statement shall be submitted to and approved in writing by the Local Planning Authority.

282. A post construction monitoring report is also secured by condition and this is included on the draft decision notice.

BREEAM

283. Southwark Plan Policy P69 requires developments to achieve a BREEAM rating of 'Excellent' for non-residential development and non-self-contained residential development over 500sqm. A Pre-Assessment BREEAM has been undertaken to establish a shell and core fit out to the commercial areas only, located on the Lower Ground level and Mezzanine level occupying 987.3sqm (GIA) / 1074sqm (GEA). The pre-assessment has considered the existing nature of the development site, along with the current development proposals and proposed building layout and demonstrated that the development being able to potentially achieve the minimum standards of the targeted 'Excellent' rating of 70.94%.
284. A planning condition is recommended to secure an independently verified BREEAM report demonstrating that these target ratings would be achieved through the detailed and technical design stages.

Water efficiency

285. For the residential aspect of the development, the applicant's Energy Assessment and Sustainability Strategy confirms that the dwellings would have a maximum indoor water consumption of 105 litres per person per day, in line with the optional standard in Part G of the Building Regulations. This will be achieved through the incorporation of low flow fixtures and fitting within the commercial and residential parts of the development to ensure water usage is minimised as possible. Therefore the development complies with Policy SI5 of the London Plan 2021.

Digital connectivity infrastructure

286. The NPPF recognises the need to support high-quality communications infrastructure for sustainable economic growth and to enhance the provision of local community facilities and services. To ensure London's long-term global competitiveness, Policy SI6 (Digital Connectivity Infrastructure) of the London Plan 2021 requires development proposals to:
- be equipped with sufficient ducting space for full fibre connectivity infrastructure;
 - achieve internet speeds of 1GB/s for all end users, through full fibre connectivity or an equivalent.
 - meet expected demand for mobile connectivity; and
 - avoid reducing mobile capacity in the local area.
287. A condition is attached to the decision notice that requires detailed plans to be submitted to and approved in writing by the Local Planning Authority demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within

the development. This is in line with the requirements of Policy SI6 of the London Plan 2021.

Health impact assessment

288. The London Plan Policy GG3 details the matters which much be considered for planning and developments to improve Londoners' health and reduce health inequalities. Additional policies which consider the health and wellbeing of Londoners include policy's GG1, D5, S1 and S2.
289. Policy P45 'Healthy developments' of the Southwark Plan states that development must:
1. Be easily accessible from the walking and cycling network; and
 2. Provide, or support opportunities for healthy activities; and
 3. Retain or re-provide existing health, community, sport and leisure facilities.
290. A Health Impact Assessment (HIA) has been submitted by HGH Consulting with the application. The HIA demonstrates that, of the 51 criteria considered by the London Healthy Urban Development Unit, the proposed development will have a positive impact on 36 and a neutral impact on 15. No negative impacts have been identified within the submitted report. It is therefore considered that the proposed development will have an overall positive impact on human health.

PLANNING OBLIGATIONS (Section 106 Undertaking or Agreement)

291. 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 echoes the Community Infrastructure Levy Regulation 122 which requires obligations to 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
292. Following the adoption of Southwark's Community Infrastructure Levy (SCIL) on 1 April 2015, much of the historical toolkit obligations such as Education and Strategic Transport have been replaced by SCIL. Only defined site specific mitigation that meets the tests in Regulation 122 can be given weight.
293. The application would be supported by the following Section 106 obligations:

Table: Section 106 Financial Obligations

Planning obligation	Mitigation	Applicant's position
Local Economy and Workspace		
Employment and Enterprise	<p>This development would be expected to deliver 38 sustained jobs to unemployed Southwark residents, 38 short courses, and take on 9 construction industry apprentices during the construction phase, or meet the Employment and Training Contribution.</p> <p>The maximum Employment and Training Contribution is £182,600 (£163,400 against sustained jobs, £5,700 against short courses, and £13,500 against construction industry apprenticeships).</p>	Agreed
Employment skills and business	An employment, skills and business support plan is to be provided for this development.	Agreed
Affordable workspace	10% affordable workspace (applicable to the commercial unit fronting Iderton Road only) to be secured in the event Jewson leave the property	Agreed
Living wage	London living wage – best endeavours	Agreed
Housing and Viability		
Affordable housing monitoring	<ul style="list-style-type: none"> Financial contribution towards affordable housing monitoring of £8,073.35 (£135.35 per unit) 	
Affordable housing	<ul style="list-style-type: none"> 40.3% by habitable room (25.3% social rent; 15% intermediate) 	Agreed
Wheelchair Units	Secure 10.5% wheelchair housing by habitable room	Agreed
Management Plan	Management, operation and promotion strategy to be submitted and agreed prior to occupation.	Agreed
Transport and Highways		
Construction Management	<ul style="list-style-type: none"> A detailed Construction Management Plan (CMP) and a £40 per unit (£6,800) contribution 	Agreed

	<p>for Construction Management within the OKR AAP area. This is for the council to manage cumulative impacts on the highways and environment.</p>	
<p>Southwark Highways s.278</p>	<ul style="list-style-type: none"> • Repave the footways including new kerbing fronting the development on Ilderton Road, Surrey Canal Road and Rollins Street using materials in accordance with Southwark's Streetscape Design Manual (SSDM). • Construct the new vehicular entrance on Surrey Canal Road in accordance with SSDM standards. Similarly upgrade the existing vehicular entrance on Rollins Street to SSDM standards. • Detailed designs and method statements (AIP) for foundations and basement structures retaining the highway (temporary and permanent) should be submitted and approved by the Highway Authority. Please contact Anthony Davis (Anthony.Davis@southwark.gov.uk). • Provide access arrangements such as a dropped kerb construction to accommodate refuse collection etc. • Promote all necessary Traffic Regulation Orders. • Upgrade street lighting to current LBS standards Please contact George Livingstone at George.Livingstone@southwark.gov.uk for further details. Investigate the possibility of providing lamp columns mounted to the building in order to improve effective footway widths. • Any new tree pits should be constructed in accordance with SSDM standards and the Council's Tree Services team should be consulted on any new planting on or adjacent to the public highway. • Refresh road markings following kerb installation. 	<p>Agreed</p>

	Rectify any damaged footways, kerbs, inspection covers and street	
TfL Obligations	TfL requested financial obligations <ul style="list-style-type: none"> • Bus contribution of £459,000 (based on £2700 per home) • TfL Cycle Hire Docking Station Contribution of £8,500 (based on £50 per home) along with free membership 	Agreed
TfL s.278	<ul style="list-style-type: none"> • The delivery of the OKR Healthy Streets scheme via an appropriate design/layout • Carriageway works • Footway and junctions including any associated bus, walking and cycling infrastructure and other related works 	
Parking permit restriction	This development would be excluded from those eligible for car parking permits under any future CPZ operating in this locality.	Agreed
Car club membership	Three year membership to new residents to car clubs operating in the area.	Agreed
Delivery and Service Plan	DSP bond contribution of £17,019.76 (£100 per resi unit + £100 per 5,000 sqm of new commercial).	Agreed
Pavement	Public Realm and highway improvements to include footways paved with precast concrete paving slabs with 150mm wide silver grey granite natural stone kerbs.	Agreed
Intersection upgrades	A proportionate financial contribution towards a Toucan crossing on Surrey Canal Road and the provision of a crossing across the commercial entrance on Rollins Street as per the recommendations of the Road Safety Audits.	Agreed
CCTV	Funding of an enforcement camera to monitor access on Surrey Canal Road.	Agreed
Energy, Sustainability and the Environment		
Futureproofing for connection to District Heat Network (DHN)	Prior to occupation, a CHP Energy Strategy must be approved setting out how the development will be designed and built so that it will be capable of connecting to the District CHP in the future.	Agreed

Carbon	<ul style="list-style-type: none"> • An off-set payment of £183,592 • Review and re-calculation of on-site savings following detailed design stage • Be Seen Monitoring 	Agreed
Archaeology monitoring/ supervision fund	£11,171 towards Archaeological monitoring	Agreed
Open Space	£119,925 contribution towards public open spaces within the OKROA	Agreed
Other obligations		
Architects	Securing Stitch Architects to deliver the building detailed design, unless otherwise agreed in writing	Agreed
Other	<ul style="list-style-type: none"> • Unless otherwise agreed with the council, not to use any part of the development as a betting shop, pawnbrokers or pay day loan shop should Jewson leave the property • Bookable internal community room 	Agreed
Administration fee	Maximum contribution to cover the costs of monitoring these necessary planning obligations, calculated as 2% of total sum	Agreed

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

295. In the event that a satisfactory legal agreement has not been entered into by 4 April 2023, it is recommended that the director of planning and growth refuses planning permission, if appropriate, for the following reason:

“The proposal, by failing to provide for appropriate planning obligations secured through the completion of a S106 agreement, fails to ensure adequate provision of affordable housing and mitigation against the adverse impacts of the development through projects or contributions that is contrary to Southwark Plan policy IP3 (‘Community Infrastructure Levy (CIL) and Section 106 Planning Obligations’), Policy DF 1 Planning Obligations of the London Plan (2021) and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015)”.

Mayoral and Southwark Community Infrastructure Levy (CIL)

296. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material “local financial consideration” in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is

therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport investments in London as a whole, primarily Crossrail, while Southwark's CIL will provide for infrastructure that supports growth in Southwark.

297. The site is located within Southwark CIL zone 2 and MCIL2 Band 2 zone. Based on the applicant's CIL Form 1 (GIA) dated 9.8.2022, the gross amount of CIL is approximately **£5,334,253.69** (pre-relief). Subject to the correct CIL forms being submitted on time, CIL Social Housing Relief can be claimed for a number of types of affordable housing. Based on Form 1, the CIL estimate is revised to **£3,283,173.16** if Social Housing Relief is successfully claimed for. It should be noted that this is an estimate, and floor areas will be checked when related CIL Assumption of Liability and Relief Claim Forms are submitted, after planning approval has been obtained.

OTHER MATTERS

298. None

COMMUNITY INVOLVEMENT AND ENGAGEMENT

299. Southwark's Draft Statement of Community Involvement and Development Consultation Charter encourages consultation with local communities, especially developers seeking permission for 'Major/Large Scale' developments. The Charter is a guide setting out the consultation requirements to be carried out by developers for proposed development.
300. A Statement of Community Involvement has been submitted along with the application. It is noted that during the time frame of this application from the first pre-app meeting with Southwark Council in April 2020, that the ability to hold public forums with respect to consultation was severely limited due to the Covid-19 pandemic.
301. It was advised during pre-app discussions with Southwark officers that the most effective way to receive feedback from the local community regarding the development would be in the form of a website consultation page.
302. With the advice of Southwark officers, an online public consultation was held in summer 2020. This was well advertised on the Old Kent Road regeneration website that is regularly updated and maintained by Southwark. The scheme was communicated to visitors by a narrated video showing visualisations and diagrams of the developing proposal. Further public consultation was also held on an independent online website where the public was invited to view and comment on the scheme.
303. As stated previously in this report, the proposals were subject to two rounds of scrutiny at the Design Review Panel, and was also scrutinised by members of the Southwark Community Review Panel. Given the above, it is considered that due to the extenuating circumstances of the Covid-19 pandemic, the efforts to source public feedback on the development proposals was acceptable in meeting the aims and objectives of Southwark's Draft Statement of Community Involvement and Development Consultation Charter

Human rights implications

304. 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.
305. This application has the legitimate aim of delivering a mixed-use development. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

CONCLUSION ON PLANNING ISSUES

306. The development will re-provide an existing business on an improved floorspace along with 170 residential homes. 61 of the new homes will be affordable, equating 40.3% by habitable rooms. This is a significantly positive aspect of the scheme.
307. All residential units have access to large private amenity spaces in the form of balconies or winter gardens. The scheme also benefits from two communal amenity spaces which meets all requirements for communal and children's playspace on site, with the communal amenity spaces being accessible to all residents within the development.
308. The quality of the proposed residential accommodation is considered to be positive, meeting or exceeding the minimum space standards and providing 58.24% dual aspect accommodation. The proposal also provides a range of housing choices from one to four-bedroom properties, including 20.6% family homes (including 14 four-bedroom homes within the social rent), and 10.5% wheelchair housing by habitable room.
309. The development will achieve 66% on-site carbon emissions, with the deficit being captured by way of a financial contribution. In addition, the proposal involves the loss of four trees (two Category B and two Category C trees), albeit 21 new trees with greater variety, as well as physical and visual value are proposed, with conditions to secure adequate replacement and protection measures.
310. The proposed development would reduce car dependency whilst significantly increasing cycle provision within the development. The increased width of the public footway along both frontages is anticipated to significantly enhance the public realm and improve the pedestrian experience through comfort and circulation when entering, visiting or moving past the site.
311. The impacts of the scheme on neighbouring properties in relation to daylight and sunlight would not result in detrimental harm to the living conditions of neighbouring occupiers. Furthermore, in many cases, where the results would not satisfy the BRE Guidelines, the retained levels would be within the range considered acceptable for an urban location.

312. The proposed development would be of a high quality of architecture, and is considered to enhance the existing appearance of the subject site whilst referencing the surrounding context. The design has ensured that there would be depth and articulation to facades of the development.
313. It is therefore recommended that planning permission be granted subject to conditions, referral to the Mayor of London, and the agreement of a Section 106 Legal Agreement under the terms as set out above.

Consultation responses from external and statutory consultees

314. This application was subject to a round of statutory consultation in January/February 2022.
315. Greater London Authority have made the following comments:
- The redevelopment of the Jewson builders merchant site is strongly supported in land-use terms in accordance Policies E4, E6, E7, H1 and Objective GG2 of the London Plan 2021
 - The scheme is proposing 40.3% affordable housing with a tenure mix of 63% social rent and 27% London shared ownership and would qualify for the Fast Track Route, subject to the Council's acceptance of the tenure mix and the applicant demonstrating engagement with a registered provider and consideration of grant funding.
 - No harm would be caused to the nearby heritage assets; height, massing and layout are generally supported and given the site's location within an area identified for tall buildings in the local plan the application generally complies with London Plan Policy D9.
 - The applicant is required to continue discussions with TfL and Southwark on Healthy Streets and with Southwark regarding the ATZ assessment; cycle parking should be amended to accord with LCDS; and contributions towards improvements to the bus network and expansion of the TfL cycle hire scheme appropriately secured, as well as the various transport-related plans highlighted in this report.
 - Additional information on the energy strategy, WLC assessment and circular economy statement is required as detailed in the technical memos provided to the applicant; and post-construction monitoring and a carbon off-set contribution is also to be secured.

Officer comment: Conditions for cycle parking in accordance with LCDS standards, and conditions regarding WLC, CES and Energy have been secured by condition. Notwithstanding this, negotiations will continue with the GLA at the Stage 2 process post planning committee.

316. Transport for London have made the following comments:

The applicant will be expected to enter in to a S278 agreement (covering carriageway, footway and junctions including any associated bus, walking and cycling infrastructure and other related works) to deliver improvements to the pedestrian, cycling and public transport environment in accordance with the Healthy Streets scheme being developed. TfL will provide a map showing the area

to be covered by the S278 and the wording that should accompany this map in a separate e-mail.

- A contribution of £2,700 per residential unit is sought towards improvements to the bus network in accordance with Policy T4 of the London Plan. This is in line with the agreement for all other sites in the OKR area. A Section 106 contribution of £985,000, calculated on a pro-rata basis, will also be sought towards the delivery of a new London Overground station, known as 'Surrey Canal', and works to support frequency improvements along East London Line in line with Policy T4. The new station will bring rail travel within easy reach of occupiers and visitors to this development, including those with mobility needs as it will have step free access, and the frequency increase on the Clapham Junction branch to 6 trips per hour, rather than 4, would increase capacity significantly.
- It is proposed that the non-residential element would be accessed via Rollins Street and the residential element via a new vehicular access on Surrey Canal Road. The applicant should justify why the existing access from Rollins Road cannot be used for both the residential and non-residential uses, as well as demonstrate how this proposed vehicle access would support the planned improvements for this junction that are aimed at enabling bus services to run along Surrey Canal Road.
- A total of 322 long-stay and 6 short-stay cycle parking spaces for the residential element are to be provided, along with 8 long-stay and 4 short-stay for the commercial element. This quantum accords with the minimum standards in terms of quantity as set out London Plan Policy T5; however, the proposals do not meet the required quality in accordance with London Cycle Design Standards (LCDS) and should be addressed prior to the Mayor's final determination of the application to ensure full compliance with Policy T5. As proposed, it would appear that a large part of the route between Block A and the cycle parking requires use of the public footway and even for Block B the route is convoluted.
- Regarding disabled persons' parking, 2 spaces are proposed for the residential element. This is equivalent to 1% of residential dwellings having access to a disabled person parking space at the outset, whereas London Plan Policy T6.1 states that proportion should be 3% and the identification of additional spaces for disabled people equivalent to another 7% of homes should demand arise. To address this, the general car parking being proposed for the non-residential element could instead be used to provide additional disabled persons' parking provision. For non-compliant disabled persons' parking provision to be considered acceptable, the suitability of the routes to key trip attractors for pedestrians from all walks of life should be demonstrated. It should also be demonstrated that spaces have been identified, and agreed with the Council, for suitable on-street provision should demand rise. Additionally, a range of good step-free alternatives to the use of a car for disabled persons must be secured and Section 106 contributions to mitigate any shortfall in car parking for disabled people.
- A parking design and management plan should be secured to ensure that parking is used only by disabled people and allocation is on the basis of need and not tied to particular homes or jobs. The applicant is encouraged to provide active electric vehicle charging facilities for all parking, including on-street spaces.
- A robust assessment of delivery and servicing demand for this development should be undertaken, as there is a concern that this is currently being underestimated. A full delivery and servicing plan should be secured through condition. The applicant is encouraged to consider the introduction of sustainable freight facilities, such as cargo bike loading areas and charging for electric or hybrid service vehicles. A full

construction logistics plan should also be secured by condition. This should be prepared in line with TfL guidance and provide details on how the impacts on the surrounding transport network would be minimised and adherence to Vision Zero.

Officer response: The comments from TfL are noted. In respect of the s278, LBS are the highways authority for the road adjacent to the site and will determine the extent of the s278 agreement. Conditions relating to cycle parking and delivery and servicing plans have been secured in the decision notice attached, along with the requirement of ECV's and the S106 Agreement will have an obligation where no resident will be able to apply for a parking permit.

Officers do not agree with TfL that the development needs to provide a payment to the delivery of the New Bermondsey Overground Station located in the London Borough of Lewisham. When the OKROA was outlined an agreement was in place whereby new residential development within Southwark would contribute £2,700 per residential unit towards the improvement of bus services in the area through S106 payments. The draft AAP also identifies the Community Infrastructure Levy payments will contribute to the delivery of the BLE. These remain the councils agreed priorities. In addition in respect of the phasing of OKRD TfL have confirmed that they do not consider that the presence of the existing South Bermondsey station or the proposed New Bermondsey station would justify changing the calculation of the phasing in the OKRD AAP. As no agreement was put in place to fund the New Bermondsey Overground Station development in the councils draft OKRD AAP this contribution will not be sought for the S106 Agreement.

317. Metropolitan Police: Comments made.

I can confirm that I have held a meeting with the design team dealing with this development at which the principles of Secured by Design were discussed. It is encouraging to see that the designers have considered Secured by Design, and I believe that this will result in a positive impact upon the development from a safety and security perspective. Continued liaison with a designing out crime officer will enhance this.

The design of the development has considered opportunity for natural surveillance, incorporates excellent lines of site and the development should 'activate' this area. These are all excellent crime prevention measures.

The ground floor footprint has also been designed in such a way that there are no alcoves or secluded areas that are often crime and ASB generators. This, again, is extremely positive in relation to crime prevention.

Lighting within the schemes public realm areas should conform to lighting standard BS 5489:2103. This lighting standard is particularly important in regard to preventing offences of violence against women and girls. Good levels of light are known to assist in preventing this type of offending as well as giving confidence to persons using the spaces in the hours of darkness.

The proposal includes a service/parking yard for the use of Jewson customers. There is an increase in theft of and from works vans, with tools and materials regularly being targeted. This yard, therefore, should be lit to the public realm standard detailed earlier and should be provided with full CCTV coverage. To assist with securing the yard at night, the car park should be gated and locked each evening. The height of these gates and boundary should be a minimum of 2.2m in height and care should be taken in designing them to ensure there are no climbing aids to assist potential offenders.

There is also a bulk storage area shown within the yard. This is a potential target for large scale theft and should be appropriately secured with a robust boundary, gates and CCTV coverage. The details of this can be discussed as the design progresses.

Officer response: The requested condition has been included on the draft decision notice and it is expected that the outstanding design measures requested by the Secured by Design officer will be submitted as part of the condition discharge.

318. London Fire Brigade: No further observations.

The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (The Order) in London.

The London Fire Brigade (LFB) has been consulted with regard to the above-mentioned premises and have no further observations to make. It should be ensured that if any material amendments to this consultation is proposed, a further consultation may be required.

Officer comment: Noted

319. Health and Safety Executive: No response to consultation request.

320. Historic England (HE):

Historic England confirmed they do not have any comments to make on this development

Officer comment: Noted

321. Natural England: No comments.

Officer response: Noted.

322. Environment Agency

We have **no objection** to the planning application as submitted, **subject to the following conditions** being imposed on any planning permission granted. Without these conditions, the proposed development on this site poses an unacceptable risk to the environment and we would wish to object to the planning application.

Officer comment: Recommended conditions and informatives are attached to the decision notice accompanying this report.

323. Arqiva: No response provided by Arqiva from consultation request.
324. Thames Water: On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

Officer comment: Comments noted and recommended informative attached to the accompanying decision notice.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

325. None.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Place and Wellbeing Department 160 Tooley Street London, SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.go.uk Case officer telephone: 0207 525 1513 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

Lead Officer	Stephen Platts, Director of Planning and Growth	
Report Author	Troy Davies, Team Leader	
Version	Final	
Dated	20 September 2022	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
Date final report sent to Constitutional Team		21 September 2022

APPENDIX 1

RECOMMENDATION

Applicant	Twenty Twenty Ilderton Wharf Limited and SGBD	Case Number	21/AP/4757
Application Type	Full Planning Application		
Recommendation	Grant subject to S106 Agreement		

Draft of Decision Notice

Planning Permission was GRANTED for the following development:

Demolition of existing buildings and erection of a mixed use development comprising a building of part 9, 23 and 25 storeys above ground to provide a replacement builders merchants with associated office, trade counter sales area , showroom and external storage/racking, a commercial unit fronting Ilderton Road (Use Class E) 170 residential apartments (Use Class C3) and other associated infrastructure.

At: ILBERTON WHARF, 1-7 ROLLINS STREET, SE15, 1EP

In accordance with application received on 30/12/2021

1 **Approved Plans**

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

20210-STCH-XX-ZZ-DR-A-1003 EXISTING SITE ELEVATION

20210-STCH-XX-ZZ-DR-A-1004 EXISTING SITE ELEVATION

20210-STCH-XX-ZZ-DR-A-1005 EXISTING SITE SECTION AA AND BB

20210-STCH-XX-ZZ-DR-A-1006 EXISTING PLAN AND ELEVATIONS

20210-STCH-XX-ZZ-DR-A-1007 EXISTING PLAN AND ELEVATIONS

20210-STCH-XX-RF-DR-A-1050 REV P04 PROPOSED SITE PLAN – LOWER GROUND FLOOR

20210-STCH-XX-RF-DR-A-1051 REV P03 PROPOSED SITE PLAN – ROOF PLAN

20210-STCH-XX-00-DR-A-1052 REV P02 PROPOSED SITE PLAN – BOUNDARY TREATMENTS

20210-STCH-XX-00-DR-A-1100 REV P03 PROPOSED LOWER GROUND FLOOR PLAN

20210-STCH-XX-0U-DR-A-1101 REV P02 PROPOSED UPPER GROUND PLAN

20210-STCH-XX-01-DR-A-1102 REV P02 PROPOSED FIRST FLOOR PLAN

20210-STCH-XX-02-DR-A-1103 REV P02 PROPOSED SECOND FLOOR PLAN

20210-STCH-XX-03-DR-A-1104 REV P02 PROPOSED THIRD FLOOR PLAN

20210-STCH-XX-04-DR-A-1105 REV P02 PROPOSED FOURTH FLOOR PLAN

20210-STCH-XX-05-DR-A-1106 REV P02 PROPOSED FIFTH FLOOR PLAN

20210-STCH-XX-06-DR-A-1107 REV P02 PROPOSED SIXTH FLOOR PLAN

20210-STCH-XX-07-DR-A-1108 REV P02 PROPOSED SEVENTH FLOOR PLAN
 20210-STCH-XX-08-DR-A-1109 REV P01 PROPOSED EIGHTH FLOOR PLAN
 20210-STCH-XX-09-DR-A-1110 REV P01 PROPOSED NINTH FLOOR PLAN
 20210-STCH-XX-10-DR-A-1111 REV P01 PROPOSED TENTH FLOOR PLAN
 20210-STCH-XX-11-DR-A-1112 REV P01 PROPOSED ELEVENTH FLOOR
 20210-STCH-XX-12-DR-A-1113 REV P01 PROPOSED TWELFTH FLOOR PLAN
 20210-STCH-XX-13-DR-A-1114 REV P01 PROPOSED THIRTEENTH FLOOR PLAN
 20210-STCH-XX-14-DR-A-1115 REV P01 PROPOSED FOURTEENTH FLOOR PLAN
 20210-STCH-XX-15-DR-A-1116 REV P01 PROPOSED FIFTEENTH FLOOR PLAN
 20210-STCH-XX-16-DR-A-1117 REV P01 PROPOSED SIXTEENTH FLOOR PLAN
 20210-STCH-XX-17-DR-A-1118 REV P01 PROPOSED SEVENTEENTH FLOOR PLAN
 20210-STCH-XX-18-DR-A-1119 REV P01 PROPOSED EIGHTEENTH FLOOR PLAN
 20210-STCH-XX-19-DR-A-1120 REV P01 PROPOSED NINETEENTH FLOOR PLAN
 20210-STCH-XX-20-DR-A-1121 REV P01 PROPOSED TWENTIETH FLOOR PLAN
 20210-STCH-XX-21-DR-A-1122 REV P01 PROPOSED TWENTY FIRST FLOOR PLAN
 20210-STCH-XX-22-DR-A-1123 REV P01 PROPOSED TWENTY SECOND FLOOR PLAN
 20210-STCH-XX-23-DR-A-1124 REV P01 PROPOSED TWENTY THIRD FLOOR PLAN
 20210-STCH-XX-24-DR-A-1125 REV P01 PROPOSED ROOF LEVEL PLAN
 20210-STCH-XX-24-DR-A-1125 REV P01 PROPOSED ROOF LEVEL PLAN
 20210-STCH-XX-24-DR-A-1126 REV P01 PROPOSED ROOF PLAN

20210-STCH-XX-ZZ-DR-A-1200 REV P01 PROPOSED NORTH ELEVATION
 20210-STCH-XX-ZZ-DR-A-1201 REV P01 PROPOSED EAST ELEVATION
 20210-STCH-XX-ZZ-DR-A-1202 REV P02 PROPOSED SOUTH ELEVATION
 20210-STCH-XX-ZZ-DR-A-1203 REV P02 PROPOSED WEST ELEVATION
 20210-STCH-XX-ZZ-DR-A-1204 REV P01 PROPOSED SITE ELEVATION – WEST
 20210-STCH-XX-ZZ-DR-A-1205 REV P01 PROPOSED SITE ELEVATION – NORTH

20210-STCH-XX-ZZ-DR-A-1300 REV P01 PROPOSED BUILDING SECTION AA
 20210-STCH-XX-ZZ-DR-A-1301 REV P01 PROPOSED BUILDING SECTION BB
 20210-STCH-XX-ZZ-DR-A-1302 REV P01 PROPOSED BUILDING SECTION CC
 20210-STCH-XX-ZZ-DR-A-1303 REV P01 PROPOSED BUILDING SECTION DD
 20210-STCH-XX-ZZ-DR-A-1304 REV P01 PROPOSED BUILDING SECTION EE
 20210-STCH-XX-ZZ-DR-A-1305 REV P01 PROPOSED BUILDING SECTION FF

Reason:

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

Permission is subject to the following Time Limits:

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

Reason:

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

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

3 **Archaeological Evaluation**

Before any work hereby authorised begins (excluding demolition to slab level and necessary site investigation works), 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 Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2021.

4 **Archaeological Mitigation**

Before any work hereby authorised begins (excluding site investigation works, demolition to slab level and archaeological evaluation 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 Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2021.

5 **Archaeological Foundation Design**

Before any work, hereby authorised begins (excluding demolition to basement level, archaeological evaluation and mitigation and site investigation works), 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 Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2021.

6 **Construction Environmental Management Plan (CEMP)**

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

A detailed specification of demolition and construction works at each phase of development including consideration of all environmental impacts and the identified remedial measures;

Site perimeter continuous automated noise, dust and vibration monitoring;

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

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

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

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

A commitment that all NRMM equipment (37 kW and 560 kW) shall be registered on the NRMM register and meets the standard as stipulated by the Mayor of London

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

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

Section 61 of Control of Pollution Act 1974,

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

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

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

BS 5228-2:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Vibration'

BS 7385-2:1993 Evaluation and measurement for vibration in buildings. Guide to damage levels from ground-borne vibration,

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

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

All demolition and construction work shall be undertaken in strict accordance with the approved CEMP and other relevant codes of practice, unless otherwise agreed in writing by the Local Planning Authority.

Reason

To ensure that occupiers of neighbouring premises and the wider environment do not suffer a loss of amenity by reason of pollution and nuisance, in accordance with Policy P56 'Protection of amenity' of the Southwark Plan (2022), and the National Planning Policy Framework (2021).

7 **Site Contamination**

Prior to the commencement of any development, excluding demolition and site clearance:

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

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

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

Reason:

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P64 (Contaminated land and hazardous substances), and the National Planning Policy Framework 2021.

8 **Drainage**

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 Sustainable Drainage Statement prepared by BWB (ref: JIR-BWB-ZZ-XX-RP-CD-0001_SDS-S2-P05, dated March 2022). The applicant must demonstrate that the site is safe in the event of blockage/failure of the system, including consideration of exceedance flows.

Reason:

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

9 **Access for Fire Appliances**

Details of access for fire appliances as required by part 5B of the Building Regulations and details of adequate water supplies for fire-fighting purposes should be provided prior to the implementation of the development (excluding demolition and site clearance) and should be secured in perpetuity on completion of the development.

Reason:

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

10 **Circular Economy Statement**

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

Reason:

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

11 **Piling Risk Assessment**

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 by a piling risk assessment 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 contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in line with paragraph 174 of the National Planning Policy Framework.

12 Tree Planting

Prior to works commencing (excluding demolition and site clearance), full details of all proposed tree planting (totalling **21 trees** unless otherwise agreed with the local planning authority) shall be submitted to and approved in writing by the Local Planning Authority. This will include tree pit cross sections, available soil volumes, planting and maintenance specifications, use of guards or other protective measures and confirmation of location, species, sizes, nursery stock type, supplier and defect period. All tree planting shall be carried out in accordance with those details and at those times.

All trees and shrubs will conform to the specification for nursery stock as set out in British Standard 3936 Parts 1 (1992) and 4 (1984). Advanced Nursery stock trees shall conform to BS 5236 and BS: 4428 Code of practice for general landscaping operations.

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

Reason:

To ensure the proposed development will preserve and enhance the visual amenities of the locality and is designed for the maximum benefit of local biodiversity, in addition to the attenuation of surface water runoff in accordance with The National Planning Policy Framework 2021 Parts 8, 11, 12, 15 and 16; Policies G1 (Green Infrastructure, G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021; and policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards and the following policies of The Southwark Plan (2022): P56 Protection of Amenity, P21 Conservation of the Historic Environment and Natural Heritage, P60 Biodiversity, and P61, Trees.

13 Agent of change

Prior to commencement of construction (excluding demolition and site clearance), an acoustic assessment shall be submitted to the Local Planning Authority to assess the impact of commercial noise from surrounding commercial operations on future occupants of the development. The assessment shall be conducted in accordance with BS4142:2014+A1-2019. The assessment shall include a review of currently proposed acoustic, ventilation, and overheating mitigation measures and a scheme of further or enhanced mitigation measures as may be necessary to ensure that future occupants do not suffer significant adverse impacts, and other adverse impacts are mitigated and minimised. Once approved the mitigation measures shall be implemented in full and permanently maintained thereafter.

Reason:

To ensure that occupiers of proposed dwellings do not suffer a loss of amenity by reason of noise nuisance due to commercial noise in accordance with the National Planning Policy Framework 2021, and Policies P56 Protection of Amenity and Policy P66 Reducing noise pollution and enhancing soundscapes of the Southwark Plan (2022).

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

14 **Hard and Soft Landscaping**

Before any above grade work hereby authorised begins (excluding demolition and site clearance), 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, available rooting space, tree pits, surfacing materials of any parking, access, or pathways layouts, materials and edge details including buffer details to residential units abutting amenity spaces), 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 of the building.

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 shall be replaced in the next planting season by specimens of the equivalent stem girth and species in the first suitable planting season. Planting shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction and BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf).

Reason:

So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2021, policy D4 ('Delivering good design') of the London Plan 2021 and policies P13 ('Design of places'), P14 ('Design quality') and P59 ('Green infrastructure') of the Southwark Plan 2022.

15 **Biodiverse Roofs**

Before any biodiverse roofs are installed, details of the biodiversity (green/brown) roof(s) for that phase 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(s) 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.

Full Discharge of this condition will be granted for each phase once the green/brown roof(s) for that phase are completed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the roof has been constructed to the agreed specification.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with: Policies SI 4 (Managing heat risk), SI 13 (Sustainable drainage), G1 (Green Infrastructure), G5 (Urban Greening) of the London Plan 2021; Policy P59 (Green Infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

16 Landscape Management Plan

Before any above grade work hereby authorised begins (excluding demolition and site clearance), a landscape management plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas shall be submitted to an approved in writing by the Local Planning Authority. The landscape management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

Reason:

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

17 Swift Bricks/Bat Bricks

Details of swift bricks and bat tubes shall be submitted to and approved in writing by the Local Planning Authority prior to any above grade façade works of the development commencing.

No less than 24 swift bricks and 12 bat bricks shall be provided and the details shall include the exact location, specification and design of the habitats. The 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.

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); P56 Protection of amenity, P57 Open space, P58 Open Water space, P59 Green infrastructure, P60 Biodiversity, P66 Reducing noise pollution and enhancing soundscapes and P69 Sustainable standards of the Southwark Plan (2022).

18 **Secure By Design**

Prior to the commencement of any above grade works (excluding demolition and site clearance), details of external security measures shall be submitted and approved in writing by the Local Planning Authority and any such security measures shall be implemented prior to occupation in accordance with the approved details which shall seek to achieve the 'Secured by Design' accreditation award from the Metropolitan Police.

Reason:

In pursuance of the Local Planning Authority's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention, in accordance with: the National Planning Policy Framework 2021 and Southwark Plan 2022 policy P16 ('Designing out crime').

19 **Materials Schedule and On-Site Presentation of Samples**

Prior to the commencement of any above grade works (excluding demolition and site clearance), samples of all external facing materials and full-scale (1:1) mock-ups of the facades to be used in the carrying out of this permission shall be presented on site to the Local Planning Authority and approved in writing. The development shall not be carried out otherwise than in accordance with any such approval given. The facades to be mocked up should be agreed with the Local Planning Authority.

Reason:

In order that the Local Planning Authority may be satisfied that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing, are suitable in context and consistent with the consented scheme in accordance with: the National Planning Policy Framework 2021, policies P13 ('Design of places') and P14 ('Design quality') of the Southwark Plan 2022 and policy D4 ('Delivering good design') of the London Plan 2021.

20 **Design Mock-ups**

Prior to commencement of any works above grade (excluding demolition and site clearance), detailed drawings at a scale of 1:5 or 1:10 through:

- i) all facade variations; and
- ii) commercial fronts and residential entrances; and
- iii) all parapets and roof edges; and
- iv) all balcony details; and
- v) heads, cills and jambs of all openings

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

Reason:

In order that the Local Planning Authority may be satisfied as to the design and details in accordance with the NPPF 2021, policies P13 ('Design of places') and P14 ('Design quality') of the Southwark Plan 2022 and policy D4 ('Delivering good design') of the London Plan 2021.

21 **Play Spaces**

i) Before any playspaces are installed within the development hereby approved, the developer shall submit details of all the play spaces proposed, including 1:50 scale detailed drawings for approval by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with any such approval given and retained as such.

ii) No later than 6 months prior to occupation of each phase, details of the play equipment to be installed within that phase 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 within that phase. All ground floor amenity and playspace within the development shall be available to all residential occupiers of the development in perpetuity.

Reason:

In order that the Council may be satisfied with the details of the play strategy, in accordance with The National Planning Policy Framework 2021, S4 of the London Plan 2021 and P15 of the Southwark Plan 2022.

22 **Wheelchair housing**

Prior to the commencement of works above grade (excluding demolition and site clearance), the developer shall submit written confirmation from the appointed building control body that the specifications for each dwelling identified in the detailed construction plans for that phase meet the standard of the Approved Document M of the Building Regulations (2015) required in the schedule below and as corresponding to the approved floor plans. The development shall be carried out in accordance with the details thereby approved by the appointed building control body.

M4 (Category 2) 'accessible and adaptable':- up to 90%

M4 (Category 3)(2)(a) 'wheelchair adaptable'.- at least 10%

Reason:

In order to ensure the development complies with P8 Wheelchair accessible and adaptable housing of the Southwark Plan and D7 of the London Plan 2021.

23 **Digital Connectivity**

Prior to any above grade works of the development hereby approved (excluding demolition and site clearance), 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 that phase of development. The development shall be carried out in accordance with these plans and maintained as such in perpetuity.

Reason:

To comply with SI 6 of the London Plan 2021.

24 Lifts

Prior to commencement of works above grade of the development hereby approved (excluding demolition and site clearance), detailed drawings shall be submitted to demonstrate that a suitably-sized evacuation lift (in addition to a firefighting lift) can and will be provided in each residential core within that phase of development. Once approved, the development shall be constructed in accordance with the approved drawings and maintained for as long as the development is occupied.

Reason:

In order to comply with London Plan 2021 Policy D5 Inclusive Design.

25 Sprinkler System

Prior to the commencement of any above grade works (excluding demolition and site clearance), full particulars of the sprinkler system to be used within the ground floor commercial units shall be submitted to and approved by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with any approval given.

Reason:

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

26 Solar Glare

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

Reason:

To ensure that occupiers of neighbouring premises or the surrounding public realm do not suffer a loss of amenity by reason of harmful glare in accordance with the National Planning Policy Framework 2021, and Policy P56 Protection of Amenity of the Southwark Plan 2022.

Pre-occupation condition(s) - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before the building(s) hereby permitted are occupied or the use hereby permitted is commenced.

27 Car Free Marketing

Prior to occupation of the development, details of the marketing materials for sale and rental properties shall be submitted and approved in writing by the local planning authority clearly identifying the development as car free (excluding the permitted designated blue badge spaces)

Reason:

To ensure compliance with P54 of the Southwark Plan 2022.

28 Signage

Prior to occupation of the commercial space, a signage strategy for that unit shall be submitted and approved in writing and the works shall only be carried out in accordance with the approved details.

Reason:

In order that the Local Planning Authority may be satisfied as to the quality of the design and details, and to ensure a satisfactory townscape environment in accordance with P14 of the Southwark Plan 2022.

29 Circular Economy Post Completion Report

Prior to occupation of the development, a Post Completion Report setting out the predicted and actual performance against all numerical targets in the relevant Circular Economy Statement for that phase shall be submitted to the GLA at: CircularEconomyLPG@london.gov.uk, along with any supporting evidence as per the GLA's Circular Economy Statement Guidance.

The Post Completion Report shall provide updated versions of Tables 1 and 2 of the Circular Economy Statement, the Recycling and Waste Reporting form and Bill of Materials. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, and prior to occupation.

Reason:

In the interests of sustainable waste management and in order to maximise the re-use of materials.

30 Whole Life Cycle

Once the as-built design has been completed for the development (upon commencement of RIBA Stage 6) and prior to the building(s) being occupied (or handed over to a new owner, if applicable), the legal owner(s) of the development should submit the post-construction Whole Life-Cycle Carbon (WLC) Assessment for that phase to the GLA at: ZeroCarbonPlanning@london.gov.uk.

The owner should use the post construction tab of the GLA's WLC assessment template and this should be completed accurately and in its entirety, in line with the criteria set out in the GLA's WLC Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the

guidance and should be received three months post as-built design completion, unless otherwise agreed.

Reason:

To ensure whole life-cycle carbon is calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan 2021.

31 Electric Vehicle Charging Points

Prior to occupation of the development, the developer shall submit plans to show delivery of all electric vehicle charging points for the commercial and residential parking bays. The development must be implemented in accordance with the approval given.

Reason:

To encourage more sustainable travel in accordance with The National Planning Policy Framework 2021 in accordance with P54 Car Parking of the Southwark Plan 2022.

32 Cycle Storage Facilities

Prior to first occupation of the development hereby consented, and notwithstanding the approved drawings, details (1:50 scale drawings) of the facilities to be provided for the secure and covered storage of cycles for that phase shall be submitted to and approved in writing by the Local Planning Authority.

Thereafter the approved cycle parking facilities provided shall be retained and the space used for no other purpose, and the development shall not be carried out other in accordance with any such approval given.

Reason:

In order to ensure that satisfactory safe and secure cycle parking and showering 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 P53 ('Cycling') of the Southwark Plan 2022.

33 Integral blinds

Prior to occupation of the development, details of suitable integral blinds to all habitable rooms (which do not clash with opening windows) shall be submitted to and approved by the local Planning Authority and once approved shall installed as approved and permanently maintained thereafter.

Reason:

To ensure that the development is designed to mitigate future changes in climate and ensure occupiers of the development do not suffer a loss of amenity by reason of overheating and excess noise in accordance with the Southwark Plan 2022 Policy P14 (Design Quality) , Policy P56

(Protection of amenity), P69 (Sustainability Standards) and the National Planning Policy Framework 2021.

34 Internal Noise Levels

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

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

Living and Dining rooms- 35dB LAeq T †

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

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

Following completion of the development and prior to occupation, a validation test shall be carried out on a relevant sample of premises. The results shall be submitted to the LPA for approval in writing. The approved scheme shall be implemented and permanently maintained thereafter.

Reason:

To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2021.

35 Vertical Sound Transmission

Prior to occupation, party walls, floors and ceilings between the commercial premises and residential dwellings shall be so adapted as necessary in light of the intended commercial use in order 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 in any habitable room.

Following completion of the development and prior to occupation, a validation test shall be carried out on a relevant sample of premises. The results shall be submitted to the LPA for approval in writing and the approved scheme shall be permanently maintained thereafter.

Reason:

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities within the commercial premises in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2021.

36 Refuse Storage Facilities

Before the first occupation of any part of the development hereby approved, the refuse storage arrangements shown on the approved drawings shall be provided and made available for use by

the occupiers. The refuse storage facilities shall thereafter be retained and the space used for no 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 and policies P56 ('Protection of amenity') and P62 ('Reducing waste') of the Southwark Plan 2022.

37 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 Sustainable Drainage Statement prepared by BWB (ref: JIR-BWB-ZZ-XX-RP-CD-0001_SDS-S2-P05, dated March 2022) 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. Prior to occupancy, the applicant shall also provide a maintenance schedule in line with the approved drainage design that details the frequency and method of maintaining the drainage infrastructure so that its functionality in the future is maintained to the standard specified in the drainage strategy.

Reason:

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

Compliance condition(s) - the following condition(s) impose restrictions and/or other requirements that must be complied with at all times once the permission has been implemented.

38 Air Quality

The development shall achieve full compliance with the air quality assessment mitigation measures as detailed in Air Quality Assessment produced by BWB dated December 2021.

Reason:

To protect future occupiers from poor external air quality in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P65 (Improving air quality), and the National Planning Policy Framework 2021.

39 Enhanced Horizontal Sound Transmission

All party walls, floors and ceilings between the commercial premises and residential dwellings shall be designed to achieve a minimum weighted standardized level difference 55dB DnTw+Ctr. Pre-occupation testing of the separating partitions shall be undertaken for airborne sound

insulation in accordance with the methodology of ISO 16283-1:2014. Details of the specification of the partition together with full results of the sound transmission testing shall be submitted to the Local Planning Authority for written approval prior to the use commencing and once approved the partition shall be permanently maintained thereafter.

Reason:

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities within the adjacent premises in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2021.

40 Plant Noise

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

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

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2021.

41 External noise levels in amenity areas

Communal and Private external amenity and play areas shall be designed to attain 55dB(A) LAeq, 16hr †, as far as is reasonably practicable.

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

Reason:

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess noise sources in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity), and the National Planning Policy Framework 2021.

42 Servicing Hours

Any deliveries or collections to the development shall only be between the following hours:

06:00 - 22:00 Monday to Saturday; and

10:00 - 18:00 on Sundays and Bank Holidays.

Reason:

To ensure that the occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance, and to reduce vehicle movements on the local road network during peak times, in accordance with: the National Planning Policy Framework 2021; Policy T7 ('Deliveries, Servicing and Construction') of the London Plan 2021 and policy P50 ('Highways Impacts') of the Southwark Plan 2022.

43 Hours of Use

The use hereby permitted for use-class E shall not be carried on outside of the hours 07:00 to 23:00 on any day.

The use hereby permitted for a Builders' Merchants shall not be carried on outside the hours of 06:00 to 22:00 on Mondays to Saturdays and 10:00 to 18:00 on Sundays and Bank Holidays

Reason:

To safeguard the amenity of neighbouring residential properties in accordance with The National Planning Policy Framework 2021 and Southwark Plan 2022 policy P56 ('Protection of amenity').

44 External Lighting

Any external lighting system installed at the development shall comply with Institute of Lighting Professionals Guidance Note 01/20 'Guidance notes for the reduction of obtrusive light'.

Reason:

In order that the Council may be satisfied as to the details of the development in the interest of the visual amenity of the area, the amenity and privacy of adjoining occupiers, and their protection from light nuisance, in accordance with The National Planning Policy Framework 2021, London Plan policy G6 ('Biodiversity and access to nature') and Southwark Plan 2022 policies P56 ('Protection of amenity') and P60 ('Biodiversity').

45 Fire Safety Strategy

The development hereby consented shall not be carried out other than in accordance with the approved Planning Fire Strategy Report (prepared by Jensen Hughes ref. EL6932/R1 Issue 2) dated 15/12/21.

Reason:

To minimise the risk to life and minimise building damage in the event of a fire, in accordance with: the National Planning Policy Framework 2021, and; Policy D12 ('Fire safety') of the London Plan 2021.

46 **Energy Efficiency**

The development hereby permitted shall be constructed in accordance with the approved Energy and Sustainability Statement (prepared by CDI ref. P05) dated 04.08.22. All measures and technologies shall remain for as long as the development is occupied, unless as otherwise agreed in writing.

Reason:

To ensure the development complies with the National Planning Policy Framework 2021 and Policy S1 2 of the London Plan 2021.

47 **Roof Plant and Other Roof Structures**

No roof plant, equipment or other structures, other than as shown on the drawings hereby approved or discharged under an 'approval of details' application pursuant to this Decision Notice, shall be placed on the roof or be permitted to project above the roofline of any part of the building as shown on elevational drawings or shall be permitted to extend outside of the roof plant enclosures of any building hereby permitted.

Reason:

In order to ensure that no additional plant is placed on the roof of the building in the interest of the appearance and design of the building and the visual amenity of the area, in accordance with: the National Planning Policy Framework 2021, Southwark Plan 2022 policies P13 ('Design of places') and P14 ('Design quality') of the Southwark Plan 2022 and policy D4 ('Delivering good design') of the London Plan 2021.

48 **Restriction of Roofs For Use For Maintenance, Repair or Means of Escape Only**

With the exception of the designated rooftop external amenity spaces and terraces depicted on the approved drawings, all areas of roof within the development hereby consented shall be used only for the purposes of maintenance, repair or means of escape, and shall not be as outdoor amenity space by the occupiers or users of the premises.

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of overlooking and noise nuisance in accordance with: the National Planning Policy Framework 2021, policy P56 ('Protection of amenity') of the Southwark Plan 2022 and policy D4 ('Delivering good design') of the London Plan 2021.

49 **Restriction of Instatement of Appurtenances**

With the exception of rainwater pipes, no meter boxes, flues, vents or pipes other than as shown on the drawings hereby approved or discharged under an 'approval of details' application pursuant to this permission, shall be fixed or installed on the elevations of the building, unless otherwise approved by the LPA.

Reason:

To ensure such works do not detract from the appearance of the building in accordance with: The National Planning Policy Framework 2021, Southwark Plan 2022 policies P13 ('Design of places') and P14 ('Design quality') of the Southwark Plan 2022 and policy D4 ('Delivering good design') of the London Plan 2021.

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

50 Archaeological Reporting

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 (if required), 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 Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2021.

51 BREEAM

(a) Before any fit out works to the non-residential units hereby authorised begins, 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 'excellent' rating (unless otherwise agreed by the local planning authority) 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) Within 6 months of the first occupation of the non-residential 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, Southwark Plan 2022 policy P69 ('Sustainability standards') and policy SI2 ('Minimising greenhouse gas emissions') of the London Plan 2021.

Informative notes to the applicant relating to the proposed development

THAMES WATER

1. There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.

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

3. A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

ENVIRONMENT AGENCY

4. Contaminated soil that is (or must be) disposed of is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:

- Duty of Care Regulations 1991

- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. Refer to the hazardous waste pages on gov.uk for more information.

The CLAIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste or have ceased to be waste. Under the Code of Practice: excavated materials that are recovered via a treatment operation can be re-used on-site providing they are treated to a standard such that they fit for purpose and unlikely to cause pollution treated materials can be transferred between sites as part of a hub and cluster project formally agreed with the Environment Agency. Some naturally occurring clean material can be transferred directly between sites. Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

The Environment Agency recommends that developers should refer to: the Position statement on the Definition of Waste: Development Industry Code of Practice and; The Environmental regulations page on GOV.UK

RELEVANT PLANNING POLICY

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 Policies

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 D7 Accessible housing

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 D14 Noise

Policy H1 Increasing housing supply

Policy H4 Delivering affordable housing

Policy H5 Threshold approach to applications

Policy H6 Affordable housing tenure

Policy H7 Monitoring of affordable housing

Policy H10 Housing size mix

Policy S1 Developing London's social infrastructure

Policy E2 Providing suitable business space

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 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

SP1a Southwark's development targets

SP1b Southwark's places

SP1 Quality affordable homes

SP3 Great start in life

SP4 Green and inclusive economy

SP5 Thriving neighbourhoods and tackling health equalities

SP6 Climate Change

AV.13 Old Kent Road Area Vision

P1 Social rented and intermediate housing

P2 New family homes

P7 Wheelchair accessible and adaptable housing

P12 Design of places

P13 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

P29 Strategic protected industrial land

P30 Office and business development

P31 Affordable workspace

P32 Small shops

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

IP2 Transport infrastructure

IP3 Community infrastructure levy and section 106 planning obligations.

Mayors SPD/SPGs

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)

The Mayor's Good Practice Guide to Estate Regeneration

Southwark SPDs/SPGs

Design and Access Statements (2007)

Residential Design Standards (2011 with 2015 update)

S106 and CIL (2015)

S106 and CIL Addendum (2017)

Sustainability Assessments (2007)

Sustainable Design and Construction (2009)

Sustainable Transport (2009)

Southwark AAP's

Draft Old Kent Road Area Action Plan (December 2020)

APPENDIX 3**PLANNING HISTORY OF THE SITE AND NEARBY SITES**Relevant Site History

Planning application (21/AP/1146) for: Screening Opinion to determine whether an Environmental Impact Assessment is required for the demolition of existing building and redevelopment of a mixed use scheme comprising approximately 1,125 sqm (GIA) plus 1,065 sqm (GEA) external yard that retains the existing Jewsons Builders Merchant on site, and up to 202 residential units (Use Class C3) in two blocks of 9/13 and 27 storeys above ground

Relevant History of Adjoining Sites

The council has approved a number of planning applications recently in the Old Kent Road Opportunity Area including:

840 Old Kent Road, London SE15 1NQ

Planning application (19/AP/1322) granted for: Demolition of existing building and redevelopment of the site to provide a new building of up to 13 and 21 storeys in height (maximum height 73.60m above ground level). Redevelopment to comprise 170 residential units (Class C3), a 1,778 sqm (GIA) retail unit (Class A1) and a 52 sqm (GIA) flexible retail unit (Class A1/A3), with associated landscaping, car parking, servicing, refuse and plant areas, and all ancillary or associated works.

227-255 Ilderton Road, SE15, OLD KENT ROAD AND LAND AT LIVESEY PLACE, LONDON, SE15 1NS

Planning application (19/AP/1773) granted: Demolition of existing buildings and the erection of a part 2/3, 9 and 28 storey (up to 94.65m AOD) mixed-use development comprising of 3,581 sqm including 2,538 sqm of industrial floorspace (Use Classes B1c/B8) at ground and intermediate levels, 598 sqm of internal loading yard, 445 sqm ancillary plant and equipment; and 253 residential apartments (C3), 35.75% affordable by habitable room, and other associated infrastructure.

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

Devonshire Grove 747-759 & 765-775 OLD KENT ROAD, LONDON SE15 1NZ & LAND AT DEVONSHIRE GROVE SE15

Full planning permission (19/AP/1239) for the demolition of all existing structures on site, the stopping up of the existing Devonshire Grove major arm (IWWMF egress road) and redevelopment to include formation of a new road reconfiguration and widening of Devonshire Grove, widening of the foot ways on Sylvan Grove and Old Kent Road, construction of Building A at ground plus 38 storeys to provide 264 residential units (Class C3), flexible retail/employment floorspace (Class A1/A2/A3/A4/B1a-c), creation of a new public realm including new public squares and spaces, associated landscaping and highways works and a new substation and all associated works.

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

Daisy Business Park 19-35 Sylvan Grove London SE15

Planning permission (19/AP/2307) for demolition of existing buildings and redevelopment of the site to provide a mixed use development comprising of 219 residential dwellings (Use Class C3) and 3,088 sqm (GIA); commercial workspace (Use Class B1) within two buildings of 5 storeys (24.55m AOD) and 32 storeys (106.43m AOD); and associated car and cycle parking, landscaping, and public realm and highways improvements.

313-349 Ilderton Road London, SE15

Planning permission (20/AP/1329) for Demolition of existing buildings and construction of two buildings, one of part 11 and 13 storeys and one of part 13 and 15 storeys, to provide 1,739sq.m (GIA) of commercial floorspace, 250 student accommodation bed spaces (Sui Generis) and 58 residential units, with associated access and highway works, amenity space, cycle parking spaces, disabled car parking spaces and refuse/ recycling stores.

CONSULTATION UNDERTAKEN

Site notice date: 23.03.2022

Press notice date: 27.01.3022

Case officer site visit date: 23.03.2022

Neighbour consultation letters sent: 21.01.2022

Internal services consulted

Ecology

Environmental Protection

Highways Development and Management

Flood Risk Management & Urban Drainage

Transport Policy

Urban Forester

Waste Management

Section 106 Team and CiL team

Tree Services

Public Health

Local Economy

Arboricultural Services

Statutory and non-statutory organisations

Environment Agency

Greater London Authority

Transport for London

Metropolitan Police Service (Designing Out Crime)

Thames Water

National Grid

London Fire & Emergency Planning Authority

Natural England

Historic England

Health and Safety Executive: Fire Risk Assessments

Arqiva

Bakerloo Line Safeguarding

Civil Aviation Authority

Vital Old Kent Road

Neighbour and local groups consulted

Name/Address	Period	Date Printed	Reply by
Flat 6 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
145 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
Unit 3 96 - 108 Ormside Street London Southwark SE	B28	21/01/2022	18/02/2022
182-196 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
8 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
Unit 29 The Penarth Centre Penarth Street London S	B28	21/01/2022	18/02/2022
Apartment 5 90 Varcoe Road London Southwark SE16 3	B28	21/01/2022	18/02/2022
Flat 4 Atar House 179 Ilderton Road London Southwa	B28	21/01/2022	18/02/2022
Unit 21A The Penarth Centre Penarth Street London	B28	21/01/2022	18/02/2022
Unit 12 The Penarth Centre Penarth Street London S	B28	21/01/2022	18/02/2022
14-38 Hatcham Road London Southwark SE15 1TW	B28	21/01/2022	18/02/2022
20 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
6 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
Flat 22 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
Flat 9 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022

Name/Address	Period	Date Printed	Reply by
206-210 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
Apartment 3 90 Varcoe Road London Southwark SE16 3	B28	21/01/2022	18/02/2022
Flat 8 Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Units 32 And 32A The Penarth Centre Penarth Street	B28	21/01/2022	18/02/2022
Units 16 And 17 The Penarth Centre Penarth Street	B28	21/01/2022	18/02/2022
Flat 20 Shirley Chisholm Court 62 Hatcham Road Lon	B28	21/01/2022	18/02/2022
Flat 12 Shirley Chisholm Court 62 Hatcham Road Lon	B28	21/01/2022	18/02/2022
Flat 5 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 4 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
132-136 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
First Floor 96-108 Ormside Street London Southwark	B28	21/01/2022	18/02/2022
Flat 3 Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Flat B 219 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
International Secretariat 215 Ilderton Road London	B28	21/01/2022	18/02/2022
Flat 7 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022

Name/Address	Period	Date Printed	Reply by
Flat 2 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
90 Varcoe Road London Southwark SE16 3DG	B28	21/01/2022	18/02/2022
Flat 2 Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
5 - 9 Record Street London Southwark SE15 1TL	B28	21/01/2022	18/02/2022
19 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
17 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
16 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
12 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
Studio 13 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Studio 10 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Studio 3 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Unit A Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Unit 28B The Penarth Centre Penarth Street London	B28	21/01/2022	18/02/2022
Flat A 219 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
Flat 1 211 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
236 Record Street London Southwark SE15 1TL	B28	21/01/2022	18/02/2022

Name/Address	Period	Date Printed	Reply by
Units 18 And 33 The Penarth Centre Penarth Street	B28	21/01/2022	18/02/2022
Flat 24 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 18 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 9 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 8 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 7 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
10 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
Unit 1 62 Hatcham Road London Southwark SE15 1TW	B28	21/01/2022	18/02/2022
Flat 13 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
21 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
11 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
147 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
Studio 11 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Unit 20 Right The Penarth Centre Penarth Street Lo	B28	21/01/2022	18/02/2022
Flat 1 213 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022

Name/Address	Period	Date Printed	Reply by
Flat A 209 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
7 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
Flat 19 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
Flat 12 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
180 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
127-135 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
137 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
Apartment 1 90 Varcoe Road London Southwark SE16 3	B28	21/01/2022	18/02/2022
Flat 1 Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Unit 21B The Penarth Centre Penarth Street London	B28	21/01/2022	18/02/2022
Flat 2 221 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
21 Hatcham Road London Southwark SE15 1TW	B28	21/01/2022	18/02/2022
Unit 7 The Penarth Centre Penarth Street London Southwark	B28	21/01/2022	18/02/2022
Flat 23 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 22 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 17 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022

Name/Address	Period	Date Printed	Reply by
Flat 14 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 10 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 3 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 2 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
179A Ilderton Road London Southwark SE16 3LA	B28	21/01/2022	18/02/2022
Flat 10 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
223-225 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
Asaholah Salvation Church Of God 137A Ormside Stre	B28	21/01/2022	18/02/2022
18 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
Ilderton Primary School Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Units 5 And 6 The Penarth Centre Penarth Street Lo	B28	21/01/2022	18/02/2022
Unit 28A The Penarth Centre Penarth Street London	B28	21/01/2022	18/02/2022
Ground Floor 180 Ilderton Road London Southwark SE	B28	21/01/2022	18/02/2022
First Floor 145 Ormside Street London Southwark SE	B28	21/01/2022	18/02/2022
Unit 4 62 Hatcham Road London Southwark SE15 1TW	B28	21/01/2022	18/02/2022

Name/Address	Period	Date Printed	Reply by
22 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
Flat 1 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
110-116 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
Studio 12 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Studio 7 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Flat A 217 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
Unit 19 The Penarth Centre Penarth Street London S	B28	21/01/2022	18/02/2022
Unit 1 And 2 96-108 Ormside Street London Southwark	B28	21/01/2022	18/02/2022
Flat A 154 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
Unit 30 The Penarth Centre Penarth Street London	B28	21/01/2022	18/02/2022
Flat 2 211 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
235 Record Street London Southwark SE15 1TL	B28	21/01/2022	18/02/2022
Unit 32A The Penarth Centre Penarth Street London	B28	21/01/2022	18/02/2022
Flat 27 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 26 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022

Name/Address	Period	Date Printed	Reply by
Flat 19 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 15 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 3 211 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
Flat 2 213 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
Studio 5 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Flat B 152 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
Unit 11 The Penarth Centre Penarth Street London S	B28	21/01/2022	18/02/2022
23 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
9 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
107-113 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
Studio 6 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Apartment 4 90 Varcoe Road London Southwark SE16 3	B28	21/01/2022	18/02/2022
Units 1 And 2 237 Record Street London Southwark S	B28	21/01/2022	18/02/2022
Units 32B And C The Penarth Centre Penarth Street	B28	21/01/2022	18/02/2022
Flat 29 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 28 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022

Name/Address	Period	Date Printed	Reply by
Flat 13 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Second Floor Flat 209 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Studio 1 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Flat 7 Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Unit 22 The Penarth Centre Penarth Street London S	B28	21/01/2022	18/02/2022
140 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
18-22 Penarth Street London Southwark SE15 1TX	B28	21/01/2022	18/02/2022
Flat 23 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
Flat 10 Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Studio 8 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
25 Hatcham Road London Southwark SE15 1TW	B28	21/01/2022	18/02/2022
Penarth Works Penarth Street London Southwark SE15	B28	21/01/2022	18/02/2022
Unit 8 The Penarth Centre Penarth Street London So	B28	21/01/2022	18/02/2022
Flat 14 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
Flat 11 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022

Name/Address	Period	Date Printed	Reply by
Flat 8 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
River Of Life Pentecostal Church 12-38 Hatcham Road	B28	21/01/2022	18/02/2022
202 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
221 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
139 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
Studio 4 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Flat 5 Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Unit 20 Left The Penarth Centre Penarth Street London	B28	21/01/2022	18/02/2022
Flat B 154 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
Ground Floor 145 Ormside Street London Southwark S	B28	21/01/2022	18/02/2022
Unit 1 140 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
Unit 14 And 15 The Penarth Centre Penarth Street L	B28	21/01/2022	18/02/2022
Unit 25 107 - 113 Ormside Street London Southwark	B28	21/01/2022	18/02/2022
Flat 21 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 16 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022

Name/Address	Period	Date Printed	Reply by
Flat 1 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 11 Atar House 179 Ilderton Road London Southw	B28	21/01/2022	18/02/2022
Flat 5 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
Flat 15 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
Flat 20 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
Flat 18 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
Unit 24 The Penarth Centre Penarth Street London S	B28	21/01/2022	18/02/2022
Unit 13 The Penarth Centre Penarth Street London S	B28	21/01/2022	18/02/2022
Apartment 2 90 Varcoe Road London Southwark SE16 3	B28	21/01/2022	18/02/2022
Studio 2 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
143 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
Unit 31 The Penarth Centre Penarth Street London S	B28	21/01/2022	18/02/2022
Unit 25 And 26 The Penarth Centre Penarth Street L	B28	21/01/2022	18/02/2022
Unit 3 The Penarth Centre Penarth Street London So	B28	21/01/2022	18/02/2022
113 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022

Name/Address	Period	Date Printed	Reply by
Flat 1 221 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
13 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
Flat 17 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
Flat 16 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
24 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
148-150 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
217 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
115-125 Ormside Street London Southwark SE15 1TB	B28	21/01/2022	18/02/2022
Studio 9 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Flat 6 Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Flat A 152 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
Part First Floor Front 180 Ilderton Road London So	B28	21/01/2022	18/02/2022
141 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
Unit 2 140 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
Flat 25 Shirley Chisholm Court 62 Hatcham Road Lon	B28	21/01/2022	18/02/2022

Name/Address	Period	Date Printed	Reply by
Flat 11 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 6 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 4 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 12 Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Flat 24 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
15 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
14 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
Unit 34 The Penarth Centre Penarth Street London S	B28	21/01/2022	18/02/2022
Unit 2 62 Hatcham Road London Southwark SE15 1TW	B28	21/01/2022	18/02/2022
Unit 23 The Penarth Centre Penarth Street London S	B28	21/01/2022	18/02/2022
First Floor Flat 209 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Unit 3 62 Hatcham Road London Southwark SE15 1TW	B28	21/01/2022	18/02/2022
118-120 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
Flat 21 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
Flat 3 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022

Name/Address	Period	Date Printed	Reply by
Apartment 6 90 Varcoe Road London B28 Southwark SE16 3		21/01/2022	18/02/2022
Flat 9 Atar House 179 Ilderton Road London B28 Southwark		21/01/2022	18/02/2022
First Floor Rear 180 Ilderton Road London B28 Southwark		21/01/2022	18/02/2022
Corner Of Sharratt Street 257-283 Ilderton B28 Road London		21/01/2022	18/02/2022
Unit 1 2 And 4 The Penarth Centre Penarth B28 Street London		21/01/2022	18/02/2022

APPENDIX 5**CONSULTATION RESPONSES RECEIVED****Statutory and non-statutory organisations**

Environment Agency
Greater London Authority
Transport for London
Metropolitan Police Service (Designing Out Crime)
London Fire & Emergency Planning Authority
London Underground
Network Rail
Natural England
Historic England
Health and Safety Executive: Fire Risk Assessments
Bakerloo Line Safeguarding

Neighbour and local groups

Unit 5/6 The Penarth Centre, Penarth Street London SE15 1TR

OPEN

MUNICIPAL YEAR 2022-23

COMMITTEE:

PLANNING COMMITTEE

NOTE:

Original held in Constitutional Team; all amendments/queries to Gerald Gohler, Constitutional Team, Tel: 020 7525 7420

OPEN

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Councillor Nick Johnson	1		
Councillor Richard Leeming	1		
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Councillor Bethan Roberts	1	Sarah Newman	
Councillor Cleo Soanes	1		
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Councillor Margy Newens (reserve)		Nagla Stevens	1
Councillor Sandra Rhule (reserve)			
Councillor Michael Situ (reserve)		CONSTITUTIONAL TEAM	
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MEMBER OF PARLIAMENT (Electronic)		TOTAL PRINT RUN	13
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List Updated: 23 September 2022