

Planning Committee

Wednesday 2 November 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: 25 October 2022



Planning Committee

Wednesday 2 November 2022

6.30 pm

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

Order of Business

1. APOLOGIES

To receive any apologies for absence.

2. CONFIRMATION OF VOTING MEMBERS

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

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

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

4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

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

5. MINUTES

3 - 6

To approve as a correct record the minutes of the meeting held on 18 October 2022.

6. TO RELEASE £101,116.98 FROM SECTION 106 AGREEMENTS TO INCREASE ACCESSIBLE HOUSING ACROSS THE BOROUGH

7 - 14

Item No.	Title	Page No.
7.	DEVELOPMENT MANAGEMENT	15 - 19
	7.1. SULTRA HOUSE, 29-31 PAGES WALK, LONDON	20 - 135
	7.2. THE COUNCIL'S STATEMENT OF CASE FOR AN APPEAL IN RELATION TO AVONMOUTH HOUSE, 6 AVONMOUTH STREET, LONDON, SE1 6NX (A 16 STOREY SCHEME, REFERENCE (21/AP/4297))	136 - 230

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

EXCLUSION OF PRESS AND PUBLIC

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

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

Date: 25 October 2022



Planning Committee

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

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

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

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

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

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

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

Please note:

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

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

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

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



Planning Committee

MINUTES of the Planning Committee held on Tuesday 18 October 2022 at 6.30 pm at Ground Floor Meeting Room G02 - 160 Tooley Street, London SE1 2QH

PRESENT: Councillor Richard Livingstone (Chair)
 Councillor Kath Whittam (Vice-Chair)
 Councillor Ellie Cumbo
 Councillor Bethan Roberts
 Councillor Cleo Soanes

OFFICER SUPPORT: Dipesh Patel, Group Manager Major Applications
 Nagla Stevens, Deputy Head of Law
 Gregory Weaver, Constitutional Officer

1. APOLOGIES

Apologies were received from Councillors Richard Leeming, Reginald Popoola and Nick Johnson. There were no reserves.

2. CONFIRMATION OF VOTING MEMBERS

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

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

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

4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

The chair noted that that two items being considered occurred in his ward of Old

Kent Road but that he would be approaching them with an open mind.

5. MINUTES

RESOLVED:

That the minutes of the meetings held on 14 September 2022 and 4 October 2022 be agreed as a correct record of the meetings, and signed by the chair.

6. DEVELOPMENT MANAGEMENT

RESOLVED:

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

6.1 ILBERTON WHARF, 1-7 ROLLINS STREET (21/AP/4757) OLD KENT ROAD

Planning Application Number: 21/AP/4757

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 and 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.

The committee considered the officer's introduction to the report.

Members of the committee asked questions of the officer present.

The applicant addressed the committee and answered questions by the committee.

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

There were no supporters living within 100 metres of the development site, or ward councillors wishing to speak on this application.

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

RESOLVED:

1. That planning permission be granted, subjected to conditions and referral to the Mayor of London and the applicant entering into an appropriate legal agreement by no later than the 18 April 2023.
2. In the event that the requirements of (1.) are not met by 18 April 2023 that the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 297 of the report.

6.2 301-303 ILBERTON ROAD, LONDON (20/AP/3560) OLD KENT ROAD WARD

Planning Application Number: 20/AP/3560

PROPOSAL:

Demolition of existing buildings and construction of a 15 storey building comprising 59 residential dwellings (Class C3) and commercial floor space (Class E(g), with landscaping (including a communal roof garden and ground floor playspace), cycle parking and associated ancillary development.

The committee considered the officer's introduction to the report.

Members of the committee asked questions of officer present.

The applicant addressed the committee and answered questions by the committee.

There were no supporters living within 100 metres of the development site, or ward councillors wishing to speak on this application.

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

RESOLVED:

1. That planning permission be granted subject to conditions, referral to the

Mayor of London and the completion of a S106 legal agreement.

2. In the event that the requirements of (1.) are not met by 28 February 2023 that the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 243 of the report.

6.3 98-104 RODNEY ROAD SE17 1RA (20/AP/2953) NORTH WALWORTH ROAD

RESOLVED:

That the application be deferred to a later date to allow officers time to further consider the community use provision.

The meeting ended at 8.32 pm.

CHAIR:

DATED:

Item No. 6.	Classification: Open	Date: 2 November 2022	Decision Maker: Planning Committee
Report title:		To release £101,116.98 from Section 106 agreements to increase Accessible Housing across the borough	
Ward(s) or groups affected:		All	
From:		Director of Planning and Growth	

RECOMMENDATION

1. That planning committee approves the release of £101,116.98 from the following Section 106 agreements to increase the accessible housing provision across the borough.

Permission Ref	Account No	Address	Amount
18/AP/0457	899	3-4 Dog Kennel Hill, SE22 8AA	£31,317.18
18/AP/4195	896	Antony House And Roderick House, Raymouth Road, SE16 2DJ	£69,799.80
TOTAL			£101,116.98

BACKGROUND INFORMATION

2. The Housing Adaptations Team (HAT) manage the installation of major adaptations to enable vulnerable, older, and disabled Southwark residents to continue living independently at home and increase the number of accessible homes across the borough.
3. The range of works includes wet rooms/level access showers, stair lifts, through floor lifts, ramps, door widening, improving external access to a property, installing accessible kitchens for wheel-chair users, improving lighting for people with sight impairments, grab/hand rails, hoists and more. An Occupational Therapist (OT) assesses residents requiring adaptations. Following the assessment, the OT will send through their recommendations setting out the requirements for the necessary adaptations.
4. The demand for adaptations to meet the needs of people with mobility/disabilities and increase the accessible housing provision across the borough is substantial and outstrips the available resources. For 2022-

23 the adaptations budget of £1.6m is already committed with agreed work programmes. Unfortunately, the impact of the COVID-19 pandemic last year has meant the HAT team now have a waiting list of 116 cases where people are waiting for urgent adaptations. In addition, the service is also receiving approx. 21 new requests each month from residents for adaptations to their properties. The S106 funding will help to address the HAT waiting list and carry out urgent adaptations whilst increasing the number of accessible homes.

5. The £101,116.98 of S106 money will help to create approx. 13 additional accessible homes enabling vulnerable people to continue living independently. Our in-house Building Surveyors will manage the schemes. All works go through a procurement exercise in line with the council's standing orders.
6. In 2021-22, the planning committee agreed for S106 monies (£719,334.87) to help increase the delivery of accessible homes across the borough. The money helped the team to complete an additional 90 adaptations.
7. The projected population increase in Southwark in relation to older people over the next few years will have a major impact on the need to provide more housing that is accessible.
 - Between 2014 and 2030 Southwark has a projected population increase in people aged 65 and over of 56% - this is the second highest percentage rise amongst all London regions. The 2021 census shows that between 2011 to 2021 there has been an increase of 15.5% of people aged over 65. The 2021 census also shows a higher than overall increase in England of 6.6%.
 - Southwark is expected to also see an increase in the amount of older people living alone, with those aged over 75 projected to increase by 37%.
 - Also within this ageing population, Southwark is expected to see a 51% rise in people with a limiting long term illness.

KEY ISSUES FOR CONSIDERATION

8. The council secures wheelchair accessible housing contributions in exceptional circumstances. This is where the development proposals demonstrate that it is not viable or feasible to meet the wheelchair accessible unit policy requirement (10% of new units) and on-site disabled car-park spaces. The S106 SPD provides for a wheelchair accessible housing offset fund which is to contribute towards the adaptation of other homes in the borough to meet the needs of people with a range of disabilities.

9. The Section 106 money will help to reduce the HAT waiting list where vulnerable residents have had to wait for urgent and necessary adaptations and improve their quality of lives.
10. The Section 106 money will increase the number of accessible homes across the borough, which are available to those who are often the most vulnerable people in society.
11. The work of the HAT team has a wider impact on other key services such as Health and Social Care. The work of the HAT team supports Hospital discharge and falls prevention, reducing the risk of falls and early admission to hospital.

Policy framework implications

12. The following acts/legislation provides a legal duty on local authorities in the provision of welfare services, which includes adaptations to the homes of vulnerable residents. These are:
 - Chronically Sick and Disabled Persons Act 1970
 - Housing Act 1985
 - Disability Discrimination Act 1995
 - NHS & Community Care Act 1990
 - Children's Act 1989 & 2000
 - Housing Health and Safety Rating System under the Housing Act 2004
13. The housing strategy vision, which includes becoming "more than a landlord" under principle 4, states "we will help vulnerable individuals and families to meet their housing needs and live as independently as possible."
14. The service helps to deliver on the council's Fairer Future Commitments theme of "A place to call home".

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

Community impact statement

15. The increased provision of accessible homes across the borough helps to support those who are most vulnerable to continue living independent and safely at home.
16. The work of the HAT team supports other key front line services across health, housing and social care. The service also works closely with other key/local organisations such as Age UK, Careers/support organisations.
17. The Section 106 money will help to reduce waiting times and enable urgent adaptations to be installed which will improve the quality of life of the vulnerable residents and their family members/carers.

18. Wider impact and cost benefit of adaptations to Health and Social Care. A number of significant research programmes have confirmed the cost benefit and savings to health and social care following the intervention of adaptations to the homes of disabled and vulnerable people. Key savings include:

- Home adaptations can help prevent or defer entry into Residential Care for older people. One year's delay can save £26,000 per person.
- An estimated cost of poor housing to the NHS is £1.4 billion per year or which 31% is attributed to falls. The advice, information and adaptations delivered through the service reduce the risk of falls on a daily basis.
- The average cost to the state of a fractured hip through falling is £28,665. This is 4.7 times the average cost of a major housing adaptation and 100 times the cost of fitting hand and grabs rails to prevent falls.

Equal opportunities

19. In everything we do as a council, we seek to promote equality. The implementation of the major housing adaption programme to increase the accessible housing provision across the borough will have a positive impact for all, including those with protected characteristics.

Resource implications

20. Once the report is approved, the Section 106 sums will be added to the Adaptations capital budget, code H-7610-1405.
21. The project will be managed by the private sector housing & adaptations team, who have extensive experience of delivering this type of work in Southwark. Staffing and any other costs connected with this recommendation are to be contained within existing departmental revenue budgets.
22. The following developments secured £101,116.98, combined, in contributions towards disabled access. All £101,116.98 is currently unallocated and available.

Permission Ref	Account No	Address	Amount
18/AP/0457	899	3-4 Dog Kennel Hill, SE22 8AA	£31,317.18
18/AP/4195	896	Antony House And Roderick House, Raymouth Road, SE16 2DJ	£69,799.80
TOTAL			£101,116.98

23. The proposed allocations accord with the above mentioned agreements and would provide appropriate mitigation for the impacts of the specific and future developments.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Director of Planning and Growth

24. The developments listed at paragraph 1 are part of a number of secured S106 Agreements for this work and will all contribute £101,116.98, combined towards funding works making improvements to the homes of assessed residents who might otherwise struggle to continue to live independently. These funds are currently unallocated and available.

Strategic Director of Finance and Governance

25. This report seeks approval from the planning committee to release the sum of £101,116.98 from the agreements listed at paragraph 1, towards the delivery of urgent adaptation schemes, details set out in the body of this report.
26. The director of planning and growth confirms the section 106 receipts associated with the agreements listed in this report have not been allocated to other projects, and the proposed allocation accords with the terms of the agreements.
27. The strategic director of finance and governance notes the resource implications at paragraphs 19-22, confirms that the council has received the related section 106 funds and they are available for the purposes outlined in this report.
28. Staffing and any other costs associated with this recommendation are to be contained within existing departmental revenue budgets.

Director of Law and Governance

29. This report seeks the release of an amount of £101,116.98 from the 2 (two) planning obligations agreements (“section 106 Agreements”) listed at paragraph 1. The intention is to allow the council to undertake various adaptations as outlined at paragraphs 2 to 4 in order to make improvements to the homes of assessed residents who might otherwise struggle to continue to live independently.
30. As members have been previously advised, it is essential that monies held in accordance with section 106 Agreements are expended in accordance with both the terms of the specific agreement and also Regulation 122 of the Community Infrastructure Regulations. Each section 106 Agreement mentioned has been reviewed and it is considered that the proposed expenditure is in accordance with its terms:

- Antony House and Roderick House, Raymouth Road, SE16 2DJ (18/AP/4195); the terms of the agreement states the Wheelchair Accessible Housing Offset Fund Contribution “means the sum of £68,000 (sixty eight thousand pounds) Index Linked to be paid by the Owner and/or Developer to the Council for the provision of wheelchair accessible affordable housing off-site in accordance with paragraph 1 of Schedule 2”;
 - 3-4 Dog Kennel Hill, SE22 8AA (Ref: 18/AP/0457); the terms of the agreement states the Wheelchair Unit Contribution “means a payment of £30,000 (thirty thousand pounds) by the Developer to the Council in lieu of the provision of a wheelchair unit at the development”. Although the specific use of the funds are not mentioned this has not been obliged towards any other expenditure. Southwark’s Section 106 Planning Obligations and Community Infrastructure Levy Supplementary Planning Document confirms the purpose of the ‘Wheelchair Accessible: Offset Fund’ is to contribute towards the adaptation of other homes in the borough to meet the needs of people with a range of disabilities.
31. The financial contributions from the s106 agreements listed at paragraph 1 are compliant with the requirement of regulation 122 of the Community Infrastructure Regulations 2010 in that they satisfy the following tests:
- necessary to make the development acceptable in planning terms because the developments could not meet the minimum 10% wheelchair accessible housing requirement; and
 - directly related to the development and fairly and reasonably related in scale and kind because the sums are calculated at £10,000 per habitable room unit (based on £30,000 for a two bed three habitable room unit). The level of payment is based on the average cost of adapting properties in Southwark over the last four years to make wheelchair equivalent alterations.
32. The Equality Act 2010 introduced the public sector equality duty, which merged existing race, sex and disability equality duties and extended them to include other protected characteristics; namely age, gender reassignment, pregnancy and maternity, religion and belief and sex and sexual orientation, including marriage and civil partnership. In summary those subject to the equality duty, which includes the council, must in the exercise of their functions: (i) have due regard to the need to eliminate unlawful discrimination, harassment and victimisation; and (ii) foster good relations between people who share a protected characteristic and those who do not. Paragraph 5 of the report assesses the overall benefits of the scheme which should reassure Members that they will safely comply with the Public Sector Equality Duty if they decide to reach this decision.

33. The Human Rights Act 1998 imposed a duty on the council as a public authority to apply the European Convention on Human Rights; as a result the Council must not act in a way which is incompatible with these rights. The most important rights for highway and planning purposes are Article 8 (respect for homes); Article 6 (natural justice) and Article 1 of the First Protocol (peaceful enjoyment of property). The proposed expenditure is not anticipated to breach any of the provisions of the Human Rights Act 1998.
34. Council Assembly on 14 July 2021 approved a change to the council's constitution to confirm that all decisions made by the council will consider the climate and equality (including socio-economic disadvantage and health inequality) consequences of taking that decision.
35. The decision to consider and approve the expenditure of section 106 monies is a matter reserved to the planning committee in accordance with paragraph 9, of Part 3F of the council's constitution.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Copies of S106 Legal Agreements	Planning Division, 160 Tooley Street, London SE1	Neil Loubser 020 7525 5451

APPENDICES

No.	Title
Appendix 1	Adaptation case studies (to follow)

AUDIT TRAIL

Lead Officer	Keith Kiernan Specialist Services Manager	
Report Author	Sajda Munshi, Private Sector Housing & Adaptations Manager	
Version	Final	
Dated	13 October 2022	
Key Decision?	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments Included
Director of Law and Governance	Yes	Yes
Strategic Director of Finance and Governance	Yes	Yes
Cabinet Member	No	No
Date final report sent to Constitutional Team		24 October 2022

Item No. 7.	Classification: Open	Date: 2 November 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	

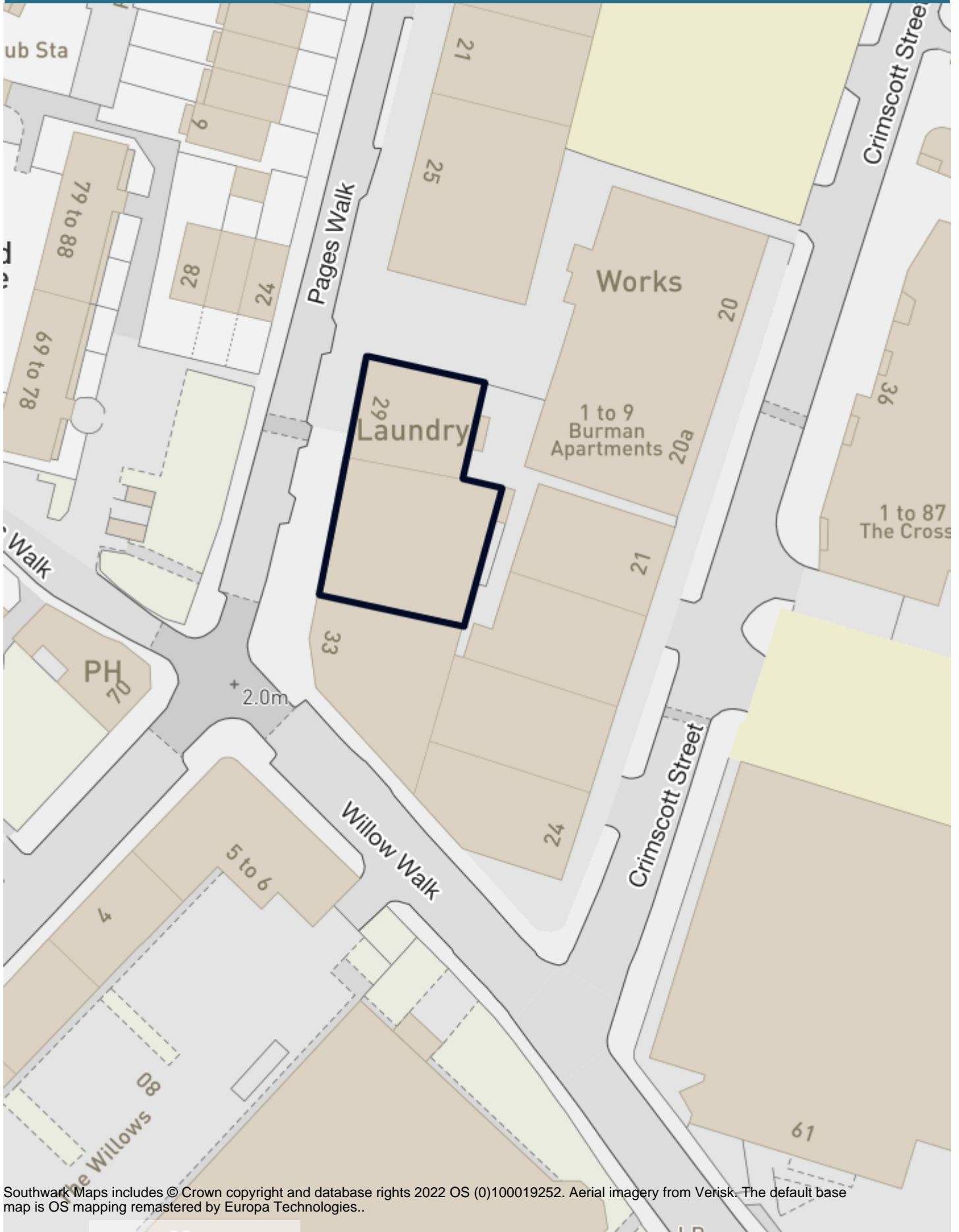
AUDIT TRAIL

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	21 October 2022	
Key Decision?	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments sought	Comments included
Director of Law and Governance	Yes	Yes
Director of Planning and Growth	No	No
Cabinet Member	No	No
Date final report sent to Constitutional Team		24 October 2022

Agenda Item 7.1



22/AP/1120 - Sultra House, 29-31 Pages Walk, London, SE1 4SB



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CONTENTS

RECOMMENDATION	3
EXECUTIVE SUMMARY.....	4
BACKGROUND INFORMATION.....	5
Site location and description	5
Details of proposal	7
Summary of consultation responses	8
KEY ISSUES FOR CONSIDERATION.....	13
Summary of main issues.....	13
Legal context.....	14
Equalities.....	14
Environmental impact assessment.....	16
Principle of development in terms of land use	16
Prematurity.....	19
Design considerations	20
Site layout	20
Height and massing	22
Architectural design and materiality	24
Landscaping.....	26
Heritage and townscape considerations.....	28
Conservation areas.....	28
Impact of proposed development on amenity of adjoining occupiers and surrounding area	33
Impact of the proposed use.....	33
Daylight and sunlight impacts	34
Overlooking of neighbouring properties	38
Transport considerations.....	39
Archaeology	42
Environmental considerations	43
Flood risk and water resources	43
Fire.....	44
Ground conditions and contamination.....	44
Air quality	44

Noise and vibration	45
Sustainable development implications	46
Energy	46
Overheating	48
BREEAM.....	48
Planning obligations (Section 106 undertaking or agreement)	48
Mayoral and Southwark Community Infrastructure Levy (CIL).....	51
OTHER MATTERS.....	51
Statement of community involvement.....	51
Conclusion on planning issues	54
Human rights implications	55
BACKGROUND DOCUMENTS	55

Item No. 7.1	Classification: Open	Date: 2 November 2022	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 20/AP/1120 for: FULL PLANNING APPLICATION Address: Sultra House, 29-31 Pages Walk, London Proposal: Demolition of existing buildings and erection of a six-storey building comprising flexible co-working offices, workshop/artist studios (Use Class E(g)), together with associated public realm improvements, roof terrace, landscaping, secure cycle storage facilities and associated works		
Ward(s) or groups affected:	London Bridge and West Bermondsey		
From:	Director of Planning and Growth		
Application Start Date	24/04/2020	Application Expiry Date	20/07/2020
Earliest Decision Date	06/08/2021	Time Extension Date	28/02/2023

RECOMMENDATION

1. That planning permission is granted, subject to conditions and the applicant entering into an appropriate legal agreement by no later than the 28 February 2023.
2. In the event that the requirements of (1.) are not met by the 28 February 2023 that the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 209 of this report.

EXECUTIVE SUMMARY

Commercial GIA

Use Class	Existing	Proposed	Change +/-
Class E(g)(iii) (light industrial)	933sqm	386sqm	-547sqm
Class E(g)(i) (offices / workspace)	0sqm	3,174sqm	+3,174sqm

Environmental:

CO2 Savings beyond part L Building Regs	49% - non-domestic element
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	Existing	Proposed	Change +/-
Urban Greening Factor	0	0.49	+0.49
Surface water run off rates (six-hour in 100 year)	3 l/s	2.0 l/s (minimum restricted discharge rate accepted by Thames Water and greenfield offset agreed)	-1 l/s
Green/Brown Roofs	0sqm	370sqm	+370sqm
Cycle parking spaces	0	56 Long stay 14 Short stay	+70

CIL and S106 (Or Unilateral Undertaking):

CIL (estimated)	£0
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MCIL (estimated)	£171,191.28
S106	<ul style="list-style-type: none"> • Carbon Offset - £65,552 • Archaeology - £3,389 • Cycle Hire Docking Station - £5,000

BACKGROUND INFORMATION

Site location and description

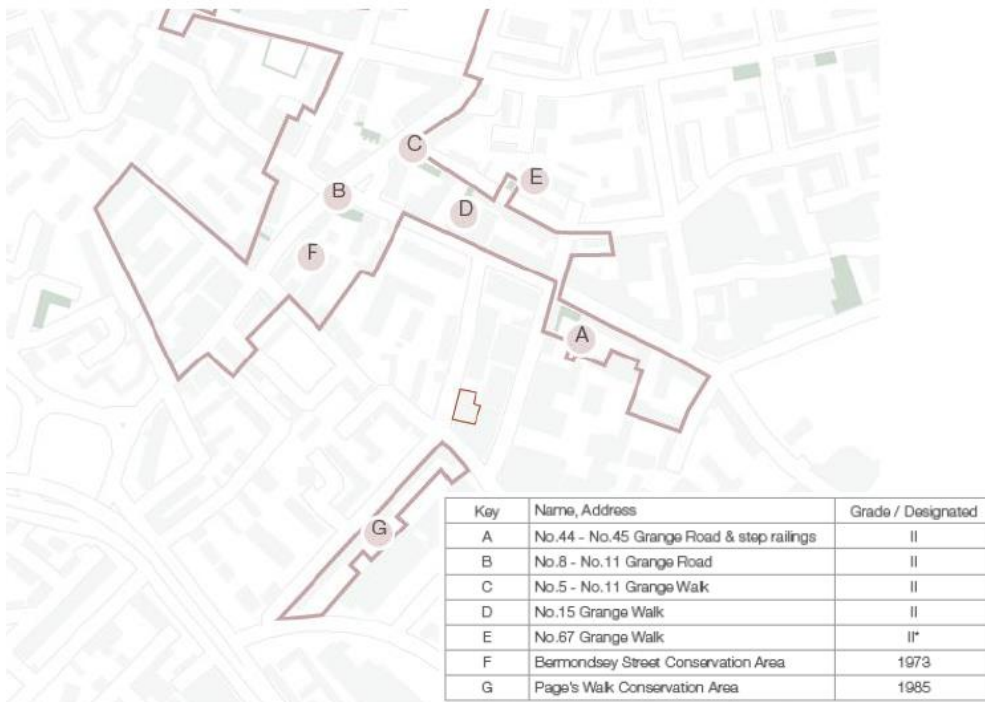
3. The subject site is a 0.077 hectare plot located on the eastern side of Pages Walk. The site has an existing two storey warehouse building with an asymmetrical pitched roof and has a maximum height of 11.8m. There is also an adjacent single storey building with a corrugated roof. Both had previously been occupied by a laundry company (Sapphire Laundry Ltd) and the building is in relatively poor condition. It had become vacant for a period of time and was recently leased out for the use as workshops, offices, film set building, and as a film location a short term basis. Its current use is Class E(g)(iii) Light Industrial use.
4. The surrounding area is of mixed character and use. To the north of the site is a shared servicing yard. It is used for customer and staff parking for nearby industrial units. 29-31 Page's Walk has shared access rights under title deed agreement to use this service yard. On the opposite side of the street from 29-31 Page's Walk is a green open space with mature trees. Beyond this green space to the west is a surface car park and flats 69-88 of the Harold Estate, which is 4 storey's in height with a pitched roof. To the south of the site is 33 Pages Walk, a single storey light industrial warehouse. To the east of the site is the back of a mix of industrial and commercial units that fronts Crimscott Street.
5. Two-storey nineteenth century terraced houses in London Stock brick line the south-east side of Page's Walk. Due to their simultaneous construction by the same developer, the terraces are consistent in design and form a strong rhythm that continues along the length of the street.

Image: site location



6. The site is not within a conservation area and the existing building is not listed. The site is however, close to the Pages Walk Conservation Area. The Pages Walk Conservation Area is located approximately 12m to the south and the Bermondsey Street Conservation Area is approximately 85m to the North. There are no statutory listed buildings in the immediate vicinity. The Victoria Public House; at the junction opposite Willow Walk is a building of merit at the northern end of the Page’s Walk. There are heritage assets in the wider area, which is not highly visible from the site and is discussed in the design section of this report.

Image: Location of heritage assets



7. The subject site is located within Sub Area 1 (Mandela Way, Crimscott Street and Old Kent Road North and specifically Site Allocation OKR 2) of the Old Kent Road Area Action Plan (OKR AAP). Within this site allocation, the indicative capacity is for 760 new homes and over 2,100 new jobs. The site is within an Urban Density Zone and an Air Quality Management Area. The site is located in Flood Zone 3 as identified by the Environment Agency. The site is designated as being within North Southwark and Roman Roads Archaeological Priority Area.
8. 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 4 on the PTAL system indicating good accessibility to public transport.
9. The Bakerloo Line Extension (BLE) project is paused subject to funding. Safeguarding still remains for the future provision of the BLE.

Details of proposal

10. Planning permission is sought for the demolition of the existing buildings on site and redevelopment to provide a six-storey building comprising commercial use only. This is Class E(g)(iii) which would consist of flexible co-working offices and workshop/artist studios. This follows amendments from the original scheme, which was a 9 storey building that provided commercial and 8 residential flats. A total of 3,769sqm (Gross internal area) of E class use would be provided.
11. The scheme has also evolved to provide at least 10% of affordable workspace on the ground floor level. Associated landscaping and public realm works are proposed, including a new loading bay in-set in to a widened footway on Page's Walk adjacent to the site.
12. The design and materiality of the proposed building has also been amended following discussions with the applicant. It is proposed to be a brick building that follows a warehouse typology. It would have distinct tiers (base, middle and top), an expressed brick frame, a lighter material at the top and a weaving of vertical and horizontal elements with distinct brick banding and decorative spandrels. The total height of the building would be 26.9m (AOD) (or 24.6m from the ground level). The roof would provide a roof terrace for the building occupiers and photovoltaic panels.
13. The development would be car free. Cycle parking and refuse storage is provided on the ground floor to the rear of the building. The main entrance into the building would be from Pages Walk.

Revisions and amendments

14. The initial scheme submitted in April 2020 proposed a mixed use scheme with the following description: “*Demolition of existing buildings and erection of a 9-storey plus basement building comprising flexible workspaces (Use Classes B1, B1a and B1c) at ground to sixth floors, and eight residential dwellings (Use Class C3) at seventh and eighth floors, together with associated public realm improvements, landscaping, private and communal amenity spaces, secure cycle storage facilities and other associated works.*”
15. That initial scheme had proposed eight apartments on the upper floors with no provision of affordable housing.
16. Negotiations were undertaken following objections to the development from neighbours. Furthermore, there was a revision of height in the amended Draft OKR AAP from a maximum of nine storeys on Pages Walk down to six storeys and as such the applicant has amended the application to a six storey commercial development. Officers had also sought changes to the materiality of the building to brick to fit in with the character of the surrounding area. The building line of the building on the upper floors have also stepped further back. The basement level has also been omitted from the scheme. In line with the changes detailed above, revised documents regarding elevations, and floor plan drawings were submitted along with revision to various documents submitted that amended some information omitting references to residential within previously submitted documents.

Summary of consultation responses

17. This application was subject to two rounds of formal consultation. The first round was for the original scheme for the mixed residential and commercial scheme (May 2020). A second round was undertaken following the submission of amended plans (July 2021). Whilst further amendments have been received since that second round of consultation, these were considered to be minor or the building reduced in size. Officers did not feel that this required a third round of consultation.
18. At the time of writing, a total of 99 consultation responses had been received from members of the public and local businesses and organisations. Given that there were two rounds of consultation, some of these are from the same occupiers. 85 of the responses are against the proposed development.
19. Objections
The main issues raised by residents objecting to the proposed development (both original residential and amended commercial only) are set out below:
20. Land use – Object to a development providing offices. Comments argue that this land should be used for light industry or distribution to take advantage of its proximity to Central London. It should not be another office block particularly after the Covid-19 pandemic where there is greater flexibility to

work remotely. Questions are raised regarding the demand for office use and whether it would be occupied.

21. Officers' response: The principle of land use has been explained in the main body of the report. The Class E use would be compatible with the surrounding uses.
22. Height - six-storeys is still a tall building in the local context. It is much too tall for Pages Walk and the local area and should be between two – three storeys. It also goes against the OKRAAP. The developer has said that the AAP sets out that buildings onto Page's Walk should be up to six storeys. But it also says on page 100 that the scale of development will reduce along Pages Walk as the masterplan transitions towards the smaller scale of adjacent residential communities and the neighbouring Pages Walk Conservation area and listed buildings.
23. Officers' response: As noted above, the scheme would be in line with the emerging AAP.
24. Size and Massing – The development would appear overbearing as it extends out towards the kerb line. The proposal retains the massive blank side wall, the full height and full depth of the building, overwhelming the two-storey buildings to the south. It forms an eyesore and emphasises the excessive massing of this proposal. The forecourt is not theirs to build on; it is commonly accessible land. Unpleasant narrowing of Pages Walk. It closes in on the street, reducing the existing openness of the area.
Crimscott Street developments does not set a precedent for Pages Walk as it has a different context.
25. Officers' response: The applicant has made a number of amendments to set back the building lines and reduce the overall height of the building. The ground floor building line is set further back. The applicant has proposed some design features to the southern wall to provide some temporary visual interest before the adjoining site (33 Pages Walk) comes forward with a redevelopment proposal. It is considered appropriate in this instance as the proposed scheme minimises any potential to prejudice the future development of the development site, as required by planning policy.
26. Architectural design - the building will achieve a "warehouse character", but Pages Walk has been developed as a terrace and has never been a 'warehouses' area. The Pages Walk elevation is now a grid of huge panels making the horizontal and vertical elements more pronounced; these are out of scale with the existing street and buildings. The previous vast glass wall was so alien but this is even more forcibly out of scale. Such large elements of construction have no sympathy or resonance in this area. The architecture should respect the Willows, the public house, the historic building line, the openness and the existing heights on the street. There needs to be some variation in rooflines/elevations to allow the free flow of air, to minimise the blocking of light.

27. Officers' response: The main report details the architectural design and how the design attempts to bring references of the warehouse typology seen in the neighbouring areas in a contemporary way. The development site sits outside of the two conservation areas and it is not considered that it must emulate all the architectural designs of the more historic buildings.
28. Impact on the heritage assets - The gateway view north out of Pages Walk Conservation Area will be blocked by the proposed building and predominantly by its blank side wall towering over the protected part of the street. This is the opposite of enhancing the Conservation Area. The amended and original proposals bear no relation to the existing character of Pages Walk, the historic urban form, the townscape or the neighbourhood. There is no recognition or understanding of what is already on the ground - what exists. Trying to achieve a "warehouse character", as claimed in the webinar, is irrelevant in Pages Walk, especially with a "modern Interpretation". Pages Walk never had the huge warehouses on which this proposal is based. Impact on the local borough views.
29. Officers' response: This has been discussed above.
30. Overshadowing – The building at the proposed scale would overshadow the existing green space across the road on Pages Walk. The Harold Estate and houses on Rose Stapleton Terrace would all be negatively affected with a loss of light.
31. Officers' response: The submitted analysis demonstrates that there would not be significant adverse impacts on the daylight and sunlight to neighbouring areas.
32. Lack of green space - This proposal does nothing to increase the local amenity in terms of green space.
33. Officers' response: The scheme is a commercial development located on a small site and given these constraints the draft AAP does not require the provision of public green space. A much larger public open space is planned on Mandela Way, albeit within phase 2 of the Old Kent Road development. The scheme does provide an improved pedestrian experience compared to the existing situation.
34. Infrastructure - strain on surrounding infrastructure and resources.
35. Officers' response: The development would be liable for Mayoral CIL and would make s106 contributions towards a cycle docking station and carbon offsetting projects.
36. Transport and traffic - The junction between Willow Walk and Pages Walk would become much more dangerous with the northern part of Pages Walk feeling so much narrower and servicing proposed to the front of the building. Increased traffic and congestion.

37. Officers' response: There would be less car trips to the site than the existing use (when it was occupied). The delivery and servicing management plan would detail the servicing needs and operation.
38. Sustainability - Large glass areas used in the building (originally proposed) are not sensitive to the requirements to make buildings liveable and with the onset of climate change will require increasing amounts of active cooling to make the building liveable (ie air conditioning). The increased footprint and volume of the building will add to the urban heat island effect in the area, and further impede the flow of air in the immediate region. Additionally there is the embodied carbon of the actual build which at 6 storeys would be significant for the local area.
39. Officers' response: The scheme would achieve 49% carbon savings and exceeds the minimum required by planning policy.
40. Social benefit - No affordable housing or family housing proposed.
41. Officers' response: This scheme has been amended to a commercial development only and there is no policy requirement for affordable homes.
42. Lack of Archaeological Excavation/Assessment - It is unfortunate that there is not going to be a full archaeological excavation/assessment.
43. Officers' response: The council's archaeology officer has considered conditions are sufficient to ensure that there would be no harm or loss of archaeological resources.
44. Flooding - The larger footprint of the building has the potential to increase run off and to increase the propensity for localised subsoil/groundwater flooding.
45. Officers' response: The applicant's drainage strategy has been considered acceptable by the council's flood and drainage engineer.
46. Social integration - Given the current Black Lives Matter movement planning and developers need to readdress how they are impacting on ethnic minorities with regard to developments in the area. Ignoring the current social and economic climate will result in social problems for years to come. The continual building of luxury developments in this area is going to divide the community and create an enclave for the rich.
47. Officers' response: This is covered under the equalities section.
48. Construction impacts – cumulative construction impacts of other nearby sites coming forward.
49. Officers' response: This will be covered by the CEMP and would be reviewed by the Council's Transport and Highways team and EPT.

50. Lack of consultation – the developers did not carry out any pre-application engagement with the local community. The council did not consult residents.
51. Officers' response: Following the first public exhibition, the applicant had sent out letters and undertook webinars.
52. Agent of change – impact on the local public house and potential future complaints.
53. Officers' response: The scheme as mixed commercial would fit in with the other light industrial and commercial uses in this part of Pages Walk and Crimscott Street neighbourhood. The activities are light industrial and offices are uses that would fit in within a mixed residential area.
54. Others - The deep foundations required for construction on the proposed site could easily de-stabilise the existing foundations leading to structural problems on houses that have been protected by the conservation area. Not optimising the site when only eight residential flats were proposed.
55. Support
13 responses are supportive of the development and a summary of their responses are set out below:
56. This is a very exciting location that has great potential to provide homes and workspace. It is currently very poor use of land/space and it is great to see something that will improve this location and contribute to the local community and businesses.
This will provide more employment space/jobs and homes. This area is changing rapidly, and these proposals are similar in size to other recent developments.
57. Given rents are now so high in Bermondsey, having cheaper work spaces in this location will fulfil a demand for enterprising businesses that are key to creative innovation and emerging industry in Southwark. The extensive efforts the designers have gone in using timber to reduce the amount of carbon in the scheme which is applaudable. The existing units are unmanaged with both nuisance illegal car parking and squatters. The openness and permeability of the ground level activates the notion of street space, which is very important for the general public to feel engaged within their community.

External consultees

58. Environment Agency
The amended proposal has removed the new dwellings that were proposed on the seventh and eighth floors of the development. The proposed development is now a less vulnerable use. Therefore do not object to the amended application, despite a lack of up-to-date modelled flood levels within the FRA. However, the applicant and the Local Planning Authority's (LPA) emergency planning team may require this data to help design and inform the proposed development's emergency plan.

59. The EA would recommend that flood resistant and resilient measures are incorporated in to the design and construction of the development proposals. The contamination report has indicated the potential for ground contamination to be present and has recommended an intrusive investigation condition to assess this.
60. Officer response: The above is noted. The council's own flood and drainage team has also reviewed the scheme.
61. Metropolitan Police Design Advisor
With regards to security, it is relatively straight forward for this development to achieve Secured By Design accreditation, and are fully supportive of that. The main requirements will be for the use of tested and accredited products in the name of the fabricator, namely doorsets, windows and glazing, is essential throughout this development, as is access control, CCTV, secure bin stores and cycle stores. Overall, the development could achieve the security requirements of Secured By Design. Achieving Secured By Design should be welcomed, especially as it is in a high crime area. Conditions are recommended.
62. Officer response: The above is noted and conditions will be imposed.
63. Thames Water
No objection subject to conditions and informative (Groundwater risk management permit, piling method statement, underground water assets).
64. Officer response: The above is noted and condition and informatives will be imposed.
65. UK Power networks
No objections

Internal consultees

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

KEY ISSUES FOR CONSIDERATION

Summary of main issues

67. The main issues to be considered in respect of this application are:
- The principle of the proposed development in terms of land use;
 - Affordable workspace;
 - Design, layout, heritage assets including views;

- Public realm, landscaping and trees;
- Impact of proposed development on amenity of adjoining occupiers and surrounding area;
- Transport;
- Noise and vibration;
- Sustainable development implications;
- Ecology;
- Air quality;
- Equalities and human rights;
- Statement of community involvement

Legal context

68. 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.
69. 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.

Equalities

70. 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.
71. 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.

72. There are a 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

73. Proposed enhancements to the streetscape on Old Kent Road would prioritise the movement of pedestrians and promote “healthier, active lives” in accordance with draft Policy AAP 10 of the draft OKR AAP. These modern design standards offer significant improvements in accessibility. The improved pedestrian environment and would benefit residents or visitors with disabilities, older people with mobility difficulties, and other groups such as parents with children. The development therefore would not raise any issues relating to disability equalities.
74. The proposed development would generate additional opportunities for local employment. The proposed development would deliver 3,769sqm (GIA) of E(g) Use Class floorspace resulting in an uplift of 2,836sqm on the existing provision. Furthermore, the 10% Affordable Workspace proposed will be secured through the S106 Agreement.

Conclusion on equality impacts

75. 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 commercial in E Use Class. 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.
76. The proposed development would undoubtedly result in a significant change to the site. The public sector equality duty does not prevent change but it is important that the council consider the acceptability of the change with a careful eye on the equality implications of that change given its duty under Section 149 of the Equality Act 2010. The council’s duty is to have due regard to the objectives identified above when making its decision. In the present context, this means focusing carefully on how the proposed change would affect those with protected characteristics and ensuring that their interests are protected and equality objectives promoted as far as possible.

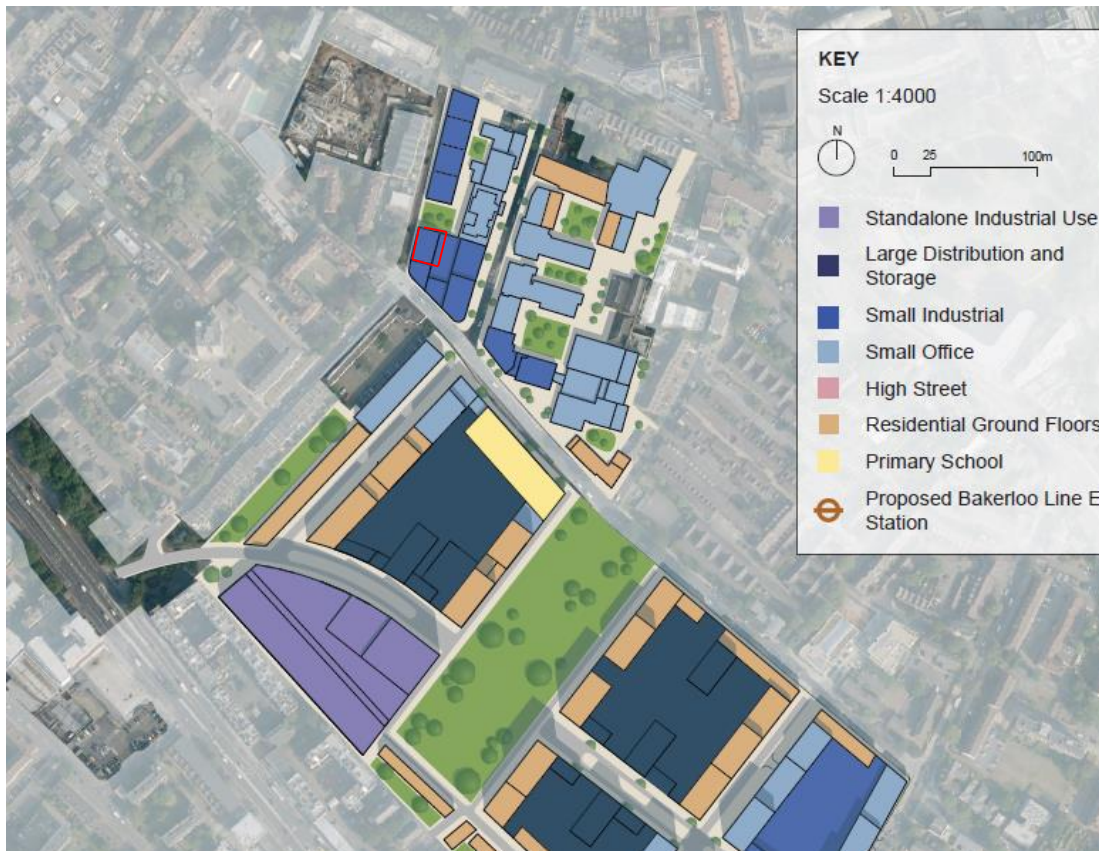
Environmental impact assessment

77. No request for an Environmental Impact Assessment (EIA) was carried out in accordance with Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Principle of development in terms of land use

78. London Plan Policy SD1 encourages Opportunity Areas to optimise residential and non-residential output and density and contribute towards meeting (or where appropriate) exceeding the minimum guidelines for housing and/or indicative estimates for employment capacity. The OKROA is identified within the London Plan as having an indicative employment capacity of 5,000. Policy GG2 of the London Plan outlines the potential to redevelop on brownfield sites within opportunity areas.
79. Adopted site allocation NSP57 and draft allocation OKR 2 in the Draft OKR AAP provide an indicative minimum capacity for the OKR 2 sub-area to provide 760 new homes and 2,179 new jobs within the immediate area. In addition, developments in this allocation should replace existing employment floorspace, and provide a range of employment spaces in preferred typologies such as small industrial and office units.
80. The existing use on site is not considered to maximise the potential of this Opportunity Area Proposal Site. It has been vacant and only recently leased out on a temporary basis for filming purposes. Whilst it is still considered an industrial use, it does not optimise the site and does not generate significant number of full time jobs. The proposed re-development of the site would introduce a commercial building comprising of 3,769sqm of Use Class E(g)(iii) floorspace. It is anticipated that the scheme would deliver regeneration benefits that are further discussed in the proceeding parts of this report.

Image: OKR Sub Area 1, showing Site Allocation OKR2 and typologies – Subject site in red outline.

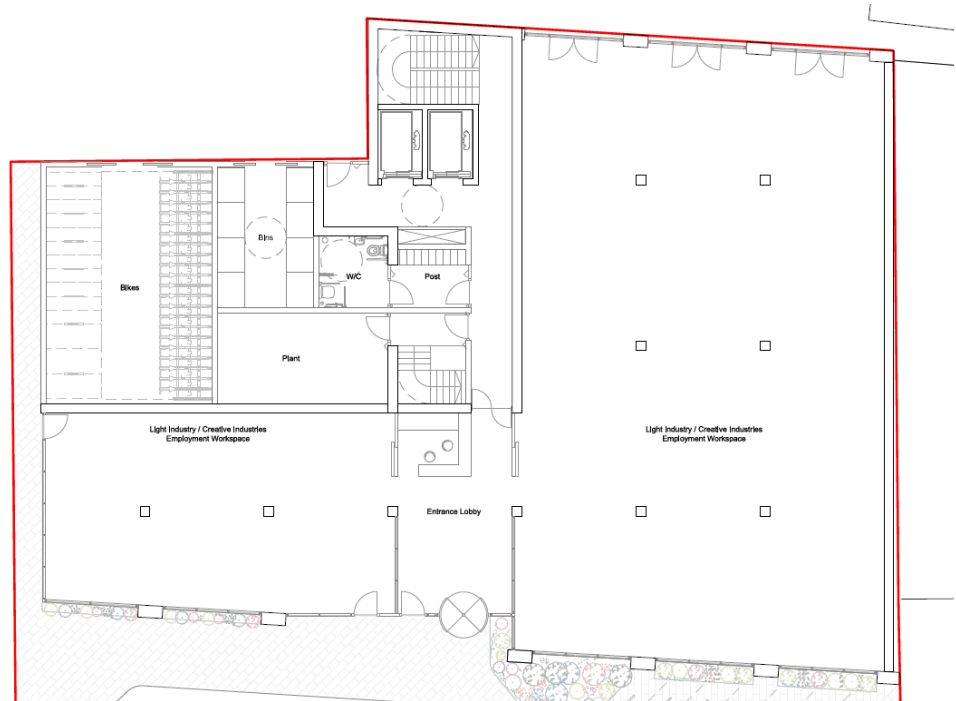


Employment Re-provision

81. The site is no longer protected in terms of strategic industrial land following the adoption of the Southwark Plan 2022. Notwithstanding this, the re-provision of improved and an uplift in employment space would meet the objectives of the vision set out in the draft AAP, which is to see office and creative sector to grow and flourish in this area. The site requirements for this site allocation also requires that redevelopment must:
- Replace existing employment floorspace and provide a range of employment spaces which are consistent with the building and land use types shown in Figure SA1.3; and
 - Provide new homes; and
 - Provide community uses including gallery space/artist's studios.
82. The scheme provides a range of employment spaces within the Class E(g), including light industrial space suitable for workshops and artist studios at ground level. Homes were originally proposed, but following discussions with the applicant this has been omitted from the scheme due to the massing and height of the building. Moreover, while new homes are required within the wider site allocation, they are not necessarily required on every individual site

and their omission from the application would not compromise the potential of the wider allocation to deliver a very significant number of new homes.

Image: Proposed ground floor



Job creation

83. Notwithstanding the current meanwhile use, the submitted Economic Statement (by BNPP) notes that the current floorspace could provide 20 full time employees. Therefore the development provides uplift in employment space, and could potentially deliver 311 full time employees. The council's local economic team (LET) advised that a development of this size and with the proposed employment densities would be expected to deliver 26 sustained jobs for unemployed Southwark Residents at the end phase, or meet any shortfall through the employment in the end use shortfall contribution.
84. 386sqm of the building would be light industrial use with the upper floors in office use – Class E(g)i. The LET recognises that there would be uplift in employment floor space, and all LET recommendations would be secured through the Section 106 (S106) agreement. If any of these expectations were not to be achieved, financial contributions would be sought in accordance with the Council's Planning Obligations and CIL SPD. An Employment, Skills and Business Support Plan would also be secured through the S106 Agreement.

Affordable workspace

85. Policy P31 (Affordable workspace) includes a requirement for development proposing over 500sqm of employment space to include 10% of the proposed gross new employment floor space as affordable workspace on site. The

affordable workspace should be secured for at least 30 years, respond to local demand and prioritise existing businesses.

86. The proposed development would deliver 3,769sqm of employment floorspace and therefore 386sqm of affordable workspace is proposed, equating to 10.24% of the total floorspace. Following discussions with the applicant, this affordable workspace would be located on the ground floor level. What was originally shown as a 'café' space on the ground floor has been amended to provide affordable workspace, which are likely to be maker spaces and artists' studios, which would be welcomed in this area and complies with Policy P31. This space would be secured for 30 years and for a rent of £12 per sqft (inclusive of service charge, insurance and VAT). This is below the market rent. In addition, a further S106 obligation regarding fit out of the affordable workspace and how it will be serviced is secured in the S106 Agreement.

Prematurity

87. 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:

88. 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.
89. The most up to date adopted development plan documents pertinent to the Old Kent Road are the 2021 London Plan, and Southwark Plan 2022. These identify the Old Kent Road Opportunity Area as having significant potential for housing and employment led growth. The draft OKR AAP has been developed in response to this adopted plan (and its previous iteration London Plan 2016) and has also sought to address the increased housing target for the opportunity area and the need to ensure that the London Plan aspirations for industrial land and employment are addressed. The scheme under consideration here is not considered to undermine either the strategic or local plan making process, and reflects the adopted statutory development plan position of the 2021 London Plan, the Southwark Plan 2022, and the 2017 and 2020 draft OKR AAPs. It is not therefore considered to be premature.

Conclusion on land use

90. The scheme would deliver major regeneration benefits, including a contribution to the borough's employment targets, inclusion of affordable workspace and the introduction of high quality commercial floorspace. It is therefore considered that the development, in land use terms, is acceptable, and its contribution to Site Allocation NSP57/OKR2 and the surrounding Old Kent Road Opportunity Area (OKROA) should be supported.
91. It is worth mentioning here that the scheme had originally come in with a viability assessment to accompany the mixed residential/office scheme. This was to justify that there could be no contribution of affordable housing due to viability reasons. This appraisal was assessed by an independent consultant and confirmed that a maximum of 1x 3 bed unit for social rent and 1x 2 bed for intermediate and represents an affordable provision of 25%. This appraisal and the benchmark land value however, is no longer valid as the scheme has been amended for a different type of use, reduced height and different type of construction.

Design considerations

92. Policy P13 (Design of places) of the Southwark Plan states that development should ensure height, scale, massing and arrangement respond positively to the existing townscape, character and context. Policy P14 (Design quality) Requires developments to have high standards of design including building fabric, function and composition, along with innovative design solutions that are specific to the site's historic context, topography and constraints.

Site layout

93. The proposed building would have two main building lines on the ground floor. In front of the building would be landscaping providing low level planting as well as visitor cycle parking. The distance between the landscaping and the kerb of the pavement is at least 2.4m. This distance is considered to be satisfactory and allows for flow of pedestrians including wheelchair users and families with pushchairs.
94. The Page's Walk pavement in front of the building entrance is set back up to 5.2 metres from the kerb of the road, with a 2.4m minimum pathway maintained at all points. There have been concerns raised from the local residents that the building line would project forward of the adjoining properties on Pages Walk. The current has a forecourt in front of the existing commercial unit and therefore currently has limited access. The ad-hoc parking that takes place on site typically limits footpath width to less than 1.5m in width. What is proposed as part of the development is for the ad-hoc parking spaces to be replaced with landscaping that will see the building setback from 5.2-4.36 metres from the kerb. There would also now be new continuous paving finish that would be new 2.4m wide footpath to the building entrance. The landscaping and cycle stands are low-level enhancements to the

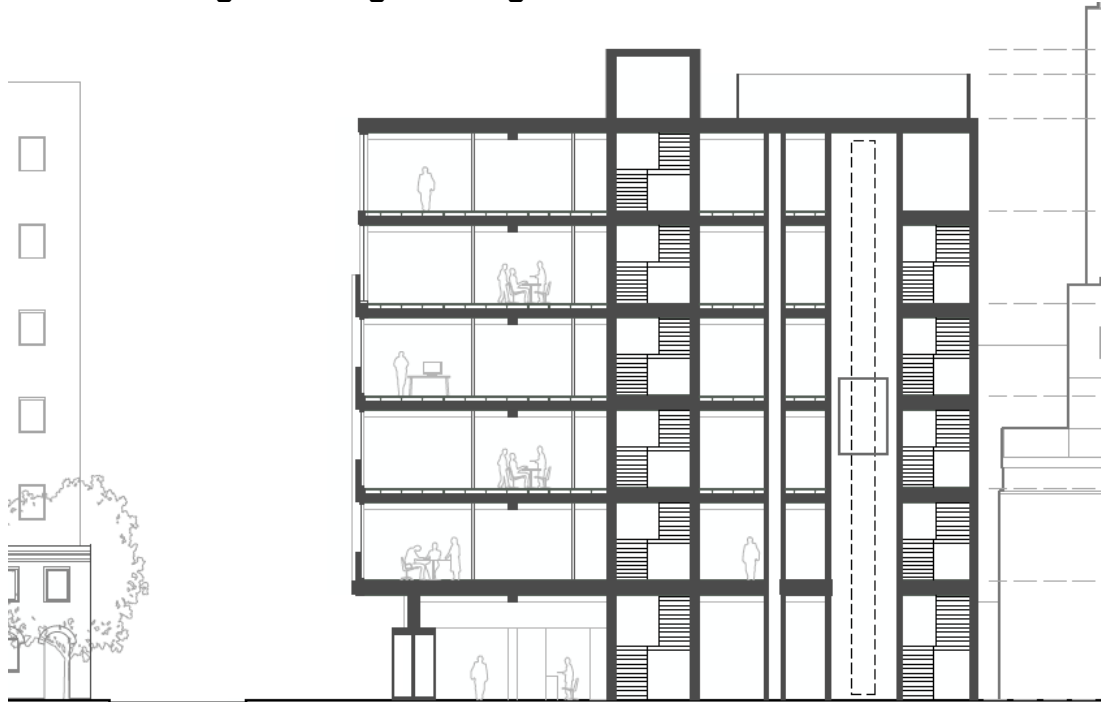
pavement edge and allow the pavement and landscaping to extend up to the edge of the proposed ground floor. This is considered an improvement on the current state of the site and public realm.

Image: Ad-hoc parking on existing forecourt



95. Notwithstanding the above, Officers have requested amendments to the upper floors. The upper floors are now set further back from Pages Walk. Floors 1 – 3 are set back 3.75m from the kerb and Floors 4 and 5 are set back 4m from the kerb. It is considered that with these further setbacks and the improved public realm works that the site layout is acceptable.

Section through building showing set back



96. The scheme has also been revised so that there is a 1m gap between the existing shared servicing yard and the north flank façade. This allows for users to access the cycle and refuse store at the rear.

Height and massing

97. The proposed development was originally proposed as a nine storey building, but following discussions with the applicant, this is reduced to six storeys with the top two levels slightly set back. The building has a slight overhang over the ground floor level, but officers are satisfied that this would not appear intrusive.
98. The draft AAP (December 2020) states that “Buildings on Pages Walk should be up to six storeys”. This is so that future development responds to the local context. The scheme as revised would comply with the height and guidance in the AAP.

Image: AAP Building Heights Guidance



Image: Section context and reduction in height

5.03 FEEDBACK RESPONSES: TOWNSCAPE SETTING

Previous height benchmarks had followed pre-app responses in looking at the relationship to 18-19 Crimscott Street. However, the latest proposals (lower section diagram) shows how proposals now step down towards Pages Walk.



Architectural design and materiality

99. The elevation strategy has been significantly revised following concerns raised by local residents. The current proposal with a contemporary warehouse typology follows that seen in the surrounding area. The building adopts various local warehouse precedents. Proposed with three tiers (base, middle and crown), the design details creates that distinction between the tiers. The base of the building is set back slightly from the upper levels with large floor to ceiling height fenestration which opens up this ground floor level.
100. The middle section of the building is designed with a brick frame that is formed by brick piers that project beyond the main façade. The width of the proposed brick piers of 29-31 Pages Walk was based on Victorian warehouses in Bermondsey Street. These brick piers sit proud of the façade, which are seen elsewhere such as the old Crosse and Blackwell factory on Crimscott Street. The brick frame would span multiple floors and help create a brick cornice that can change the upper floors' scale and make them appear set back from street level. The crown of the building uses more narrow brick piers to make this appear to be a lighter structure. The rhythm and pairing of the windows are designed to differentiate the base and middle.
101. Other design details include horizontal brick banding details that give the elevation visual interest facing Pages Walk. More detail of this fabric detailing would be secured by a condition. The detailing would continue round the northern and western facades. Given that the southern elevation faces No. 33 Pages Walk and could potentially be developed in the future, this elevation is treated differently and does not have windows which might prejudice the future development of this adjoining site. Officers requested minor amendments to this southern elevation to provide some visual interest while the adjoining site remains undeveloped and the applicant has proposed recessed brick panels. It is considered that the facades have sufficient depth of detailing that provides a sense of modulation and creates that visual interest.
102. The materials have been selected for their durability and off-site manufacturing technique. The facing material would be brick and would give that industrial aesthetic seen in the surrounding area and as required by the AAP. The superstructure uses a glulam composite frame with cross-laminated timber floors to reduce the embodied carbon of the building. The horizontal banding detailing would be precast glass-reinforced concrete. The windows would be made from bronze coloured double glazed aluminium. It is considered that the chosen material palette would be of high quality and the predominant use of brick is consistent with the surrounding context.

Image: Elevational treatment

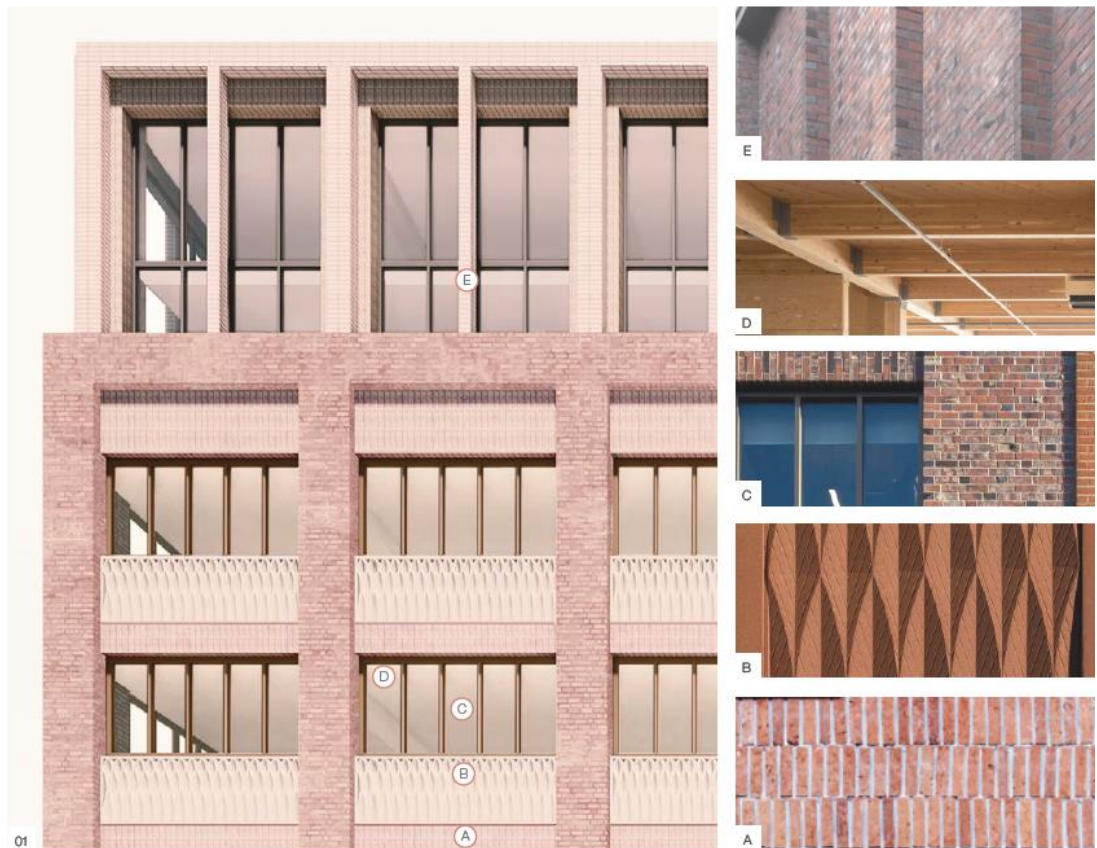


Image: Middle and top



103. Policy AAP 10 states that reveals should generally be of a full brick depth (215mm). Full details will be required by condition. In order to ensure that this is realised in the final building planning conditions requiring detailed drawings, material samples and full scale mock ups are recommended.

Image: Material palette



Landscaping

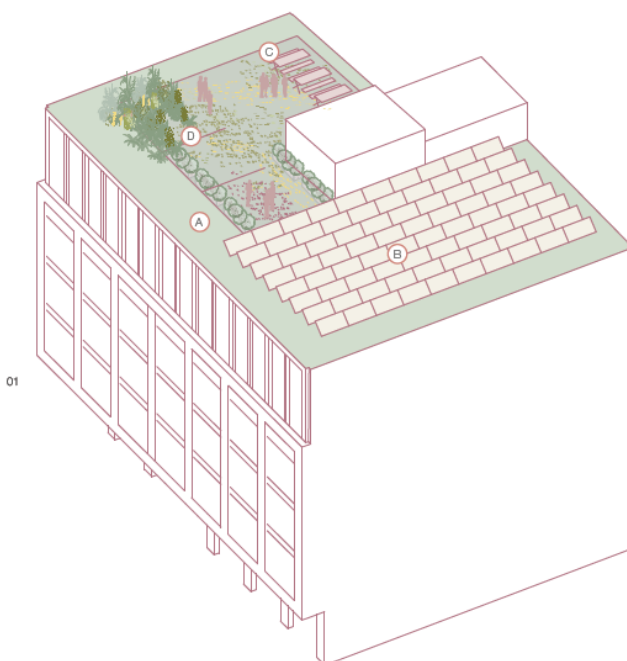
104. The building is setback at the ground floor to allow the public realm to extend. There would be soft landscaping in low level planters and cycle parking. The rooftop terrace provides the communal amenity space for the occupiers, and is located alongside the biodiverse roof. Officers are encouraged by the landscaping proposed, and a condition is attached to this decision requiring the details of hard and soft landscaping. It is also proposed to provide an inset loading bay along the Pages Walk frontage and this would be at level surface. This loading bay will cater for the delivery requirements and the refuse collection arrangements for the site.
105. Policy P59 of the Southwark Plan (Green infrastructure) states that 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.
106. The council's ecology officer has reviewed this and considers that the reduction in the height of the building would be more acceptable as it would reduce any shading to the open space opposite on Pages Walk. The proposed roof under the PV panels is also welcomed and has recommended a condition

regarding the details of the green roofs (for biodiversity) and the inclusion of 12 swift bricks.

Urban greening and trees

107. 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 predominately commercial development (excluding E(g) iii uses).
108. The development proposes an urban greening factor (UGF) of 0.49 which substantially exceeds the recommended 0.3 score for commercial developments. This is a positive aspect of the scheme, and officers are encouraged from the proposals to significantly enhance the UGF on site.
109. The site does not contain any existing trees. There is an existing landscaped area opposite the site on Pages Walk and following the daylight and sunlight impact assessment submitted, it is not considered that there would be significant shading to this space.

Image: Landscaping on the roof



Secure by Design

110. Secure by Design officers from the Metropolitan Police have reviewed the proposals and confirmed that having discussed this with the developer (the relevant crime trends in the area and the ways in which this development can

be secured to prevent crime and ASB), is satisfied that the development will not become a crime generator and that any crime and ASB can be mitigated against appropriately using the correct tested and accredited products and a robust access control strategy. The Metropolitan Police design adviser states that in order to achieve these goals a condition is placed on the development if permitted to achieve a Secure by Design award.

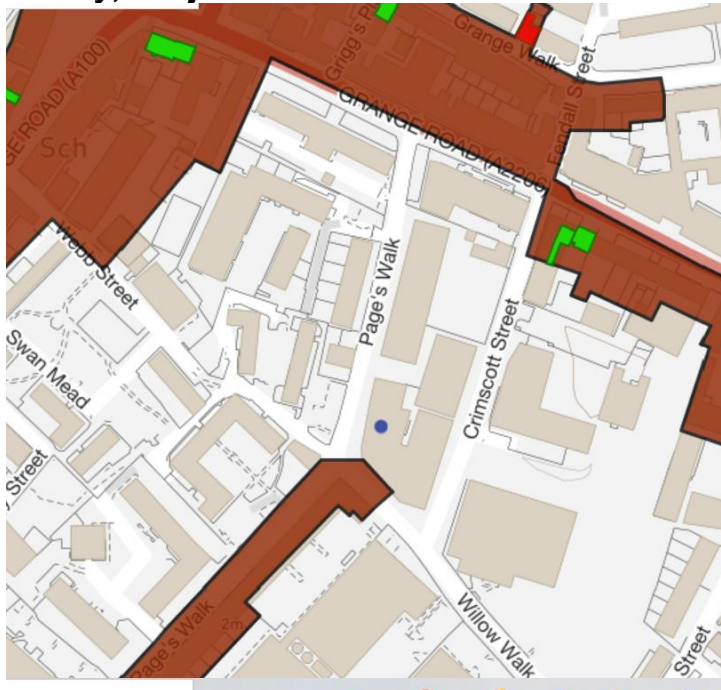
Heritage and townscape considerations

111. 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

112. The subject site is not located within the boundaries of a conservation area, nor is it identified as a listed building. However, the subject site is located adjacent to the Pages Walk Conservation Area, and approximately 120m south of the southeastern edge of the Bermondsey Street Conservation Area. At this part of the Bermondsey Street Conservation Area, the closest Listed Buildings to the application site are located at nos. 44 and 45 (and attached railings to steps) Grange Road (both Grade II listed).

Map: Listed buildings (green) and conservation areas (brown) located nearby; subject site is blue dot



Draft OKR APP and draft local list

113. Although of very limited weight, the draft OKR AAP also identifies buildings within the OKROA on account of them holding architectural interest and townscape merit. Although the buildings on the list have no statutory protection, their status is still a material consideration in any planning application. The buildings of townscape merit within 100m of the subject site are:

- 47-73 Pages Walk
- 70 Pages Walk
- 1-8 The Willows

114. The Page's Walk conservation area is situated between Willow Walk and Old Kent Road and is comprised of a row of dwellings built in the latter part of the 19th century. The dwellings now back onto an industrial area that is segmented by Mandela Way; and fronted by the Guinness Square housing estate and the former Page's Walk School. The Page's Walk Conservation Area was designated by the Council on 30 June 1986, consisting of the eastern part of the street, south of Willow Walk. The Page's Walk Conservation Area is a notable surviving example of mid-nineteenth century Worker's terraced housing, of a strong unified character.

115. The area within the conservation area is substantially residential. The only other uses within the conservation area are business and office use at Nos. 1-8 Willow Walk, on the corner of Page's Walk. The conservation area is very cohesive in character, consisting for the most part of two storey mid-nineteenth century terraced dwellings in London stock brick.

View: Looking north from Pages Walk conservation area and terraced housing



116. Views to the north and south are dominated either by residential blocks or industrial/ warehouse buildings outside the conservation area.
117. In terms of its impact on nearby listed buildings, it is considered to be of some distance from the site and would not be in direct view. As such, the significant of the heritage assets would be conserved.

Protected views

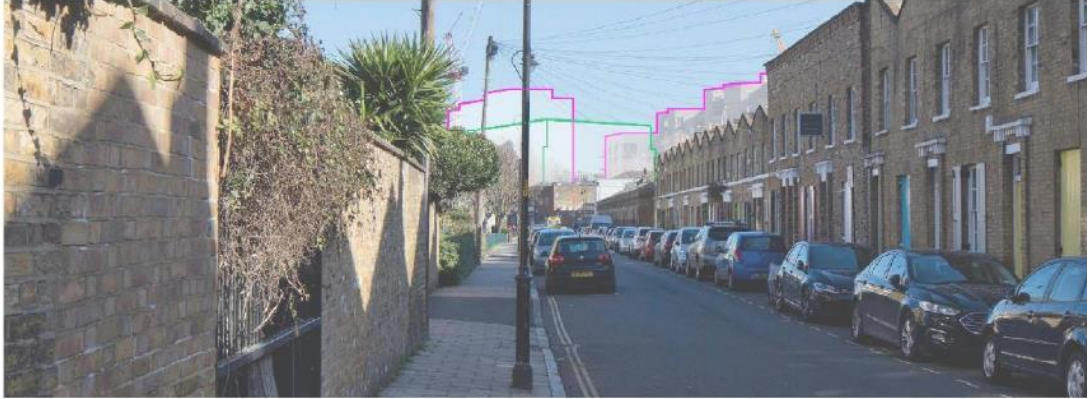
118. The development sits just inside of the background viewing corridor within the London Views Management Framework (LVMF), 3A.1 (view from the Kenwood Gazebo to St. Paul's Cathedral). The proposed development would be obscured by the interposing developments and would not affect the ability to appreciate St. Paul's Cathedral.

View 3A.1 from Kenwood gazebo to St Paul's Cathedral.



119. The applicant has also assessed its impact on local views (The linear view of St Pauls Cathedral from Nunhead Cemetery). The site just sits marginally within this view and does not detract from it. The submitted information include views from the edge of both conservation areas. The submitted images and views show that the reduction in height reduces the amount of built form that is visible from the Pages Walk Conservation area. When the materials of the building are considered, the change to brick will also ensure that there is a commonality of materials with the conservation area.
120. The submitted information include views from the edge of both conservation areas. The submitted images and views shows that the reduction in height reduces the amount of built form that is visible from the Pages Walk Conservation area. When the materials of the building are considered, the change to brick will also ensure that there is a commonality of materials with the conservation area.
121. When the application site is viewed from within the conservation area looking north-east, it the existing residential buildings and their distinctive butterfly roof profile would be visible and can still be readily appreciated (see image below). It can also be seen that the proposed development would sit in context with the emerging developments on Pages Walk.

View: Height reduction as seen from Pages Walk (development in green)



122. The Bermondsey Street Conservation Area is to the north of the Site and there is a degree of visibility from the edge of the conservation area. The view includes recently permitted development such as 18-19 Crimscott Street which establishes the changing context for the area. The application proposals are seen against this context with the proposals being seen as a contextual response to the surroundings.

Image: View from Bermondsey Street Conservation Area



123. The scheme is designed with a warehouse aesthetic and is informed by the prevailing characteristics of Bermondsey Street Conservation Area. Officers consider that the revised design and height would not impact on the character or appearance of the Bermondsey Street Conservation Area.
124. The following table summarises the designated heritage assets that could be impacted by the proposal, and what harm, if any has been identified.

Listed Buildings and Conservation Areas	Assessment of Impact on heritage significance
LVMF Views	No harm identified
Local Views	No harm identified
Pages Walk Conservation Area	Less than substantial harm
Bermondsey Street Conservation Area	No harm identified
Listed Buildings	No substantial harm identified owing to the height and distance of the development from nearby assets
Draft Locally listed buildings/ undesignated assets identified in the draft Old Kent Road AAP	No harm identified.

125. 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

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

126. 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 use

127. Given the surrounding area comprises of mixed use developments, commercial and industrial warehouse, along with residential uses, it is considered that the commercial/office use would not detrimentally impact surrounding neighbour amenity. In addition, the proposed use complies with

the typologies for this site within OKR 2, and accordingly is found to be an acceptable use.

Daylight and sunlight impacts

128. 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).

BRE daylight tests

129. The application assessed the impacts of daylight and sunlight based on the Building Research Establishment (BRE) Report 209 Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice 2nd Edition (2011)' (BRE, 2011). The revised BRE guidelines were published in June 2022. These affect the proposed units' internal daylight and sunlight calculations (the ADF approach to assessing levels has been removed, although the ASPH test is retained, and there is no change to assessing the impact on neighbouring properties). As such, the new guidance is not relevant in this case of this application.. It should also be acknowledged that this application has been in since April 2020 (well before the revised BRE guidelines were published).
130. 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.
131. The BRE guideline tests undertaken for this daylight assessment are the Vertical Sky Component (VSC), and Daylight Distribution (DD). The VSC test calculates the angle of vertical sky at the centre of each window and plots the change between the existing and proposed situation. The target figure for VSC recommended by the BRE is 27%, which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE also advises that VSC can be reduced by about 20% of its original value before the loss is noticeable. In other words, if the resultant VSC with the new development in place is less than 27% and/or less than 0.8 times its former value, then the reduction in light to the window is likely to be noticeable.
132. The distribution of daylight within a room can be calculated by plotting the 'no skyline'. The no sky-line is a line which separates areas of the working plane that do and do not have a direct view of the sky. Daylight may be adversely affected if, after the development, the area of the working plane in a room which can receive direct skylight is reduced to less than 0.8 times its former value.

BRE sunlight tests

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

Overshadowing

134. 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.’
135. The closest properties to the development consist of a mix of residential and commercial buildings. These properties are:
- 1) Rich Industrial Estate (plots 2, 3 & 4) – These properties are new build blocks of flats and are located on the opposite side of Crimscott Street, directly to the east of the proposed development site.
 - 2) 1 – 34 & 69-68 Harold Estate - These properties appear to be blocks of flats and are located to the west/north-west of the proposed development site.
 - 3) 9, 24, 25, 26, 28 & 33 Pages Walk – These residential properties are located to the north and south of the proposed development site.
 - 4) 20, 21, 22, 23 & 24 Crimscott Street – These properties are located to the east of the proposed development site, directly behind the proposed massing.
 - 5) 80 Willow Walk & The Willows – These properties are located to the east of the proposed development site.

136. The applicant's submitted daylight and sunlight impact assessment demonstrated that a number of the neighbouring properties tested as part of this assessment showed full Compliance with every test. These properties are listed as follows:
- Rich Industrial Estate Plot 4
 - 9, 26 & 28 Pages Walk
 - The Willows
137. Other properties in the area that are commercial have been considered but did not need to be tested under the BRE guidance. The following paragraphs will detail the impact of the scheme to those properties that would experience some loss of daylight or sunlight.
138. 69-88 Harold Estate
All main habitable room windows meet the BRE VSC recommendations with the exception of 14 windows, spread over the ground and first floors. However, of those 14 windows, 8 of these windows achieve a result of 0.71 and above, against a recommended target of 0.8. It is considered that at 0.71 this would be a minor adverse loss that is reasonable for a built-up dense urban environment. It should also be noted that all of the windows falling short of their targets at this property are obstructed by overhanging balconies. The BRE guidance notes that balconies to existing buildings can reduce levels of light to the rooms they serve. The applicant has included an assessment with the balconies. The guide goes on to explain that an additional calculation may be carried out assuming that the balconies do not exist. If the windows meet the targets on this basis then this confirms that it is the balcony that prevents the targets from being met as opposed to an unreasonable level of obstruction caused by the development.
139. The alternative assessment demonstrates that all the windows surpass the requirements without the balconies and proves that it is the balconies that restrict daylight into those windows. Likewise, the daylight distribution tests show some windows not meeting the guidelines, but with the alternative assessment it demonstrates that all but one window do not meet the guidelines. This window on the ground floor (R24) achieves a result of 0.74 of its former value. This is considered to be relatively good in this urban context.
140. In terms of sunlight, all the main habitable room living windows meet the guidelines apart from 6 windows. The applicant has again carried out the alternative test removing the balconies and showed that all but one of the windows do not meet the guidelines. This is a ground floor room (R24) and the loss is a ratio of 0.68 from the previous value for annual sunlight. This is below the 0.8 target, but it not considered to be significant for such an urban location.
141. In terms of overshadowing, the test show that sunlight availability to each of the tested spaces after the development will be no less than 0.98 their former value. This is better

than the BRE minimum requirement. The proposed development therefore passes the BRE overshadowing to gardens and open spaces test.

142. 24 Pages Walk

All main habitable room windows meet the BRE VSC recommendations with the exception of window 1 on the ground floor and window 2 on the first floor. However, the results are no less than 0.78 their former value, against a target of 0.8 which is not considered to be significant. In terms of daylight distribution results, the analysis shows that all the rooms would meet the guideline requirements.

143. In terms of sunlight impacts, all the windows would meet the guidelines. In terms of overshadowing to the amenity space, the sunlight availability to the garden at this property will be reduced to 0.12 (less than 0.8 times its former value) after the proposed development. This is considered to be a very low, however, it is noted that the existing garden already has a low sunlight availability and any reduction would mean a greater change in the ratio. The applicant also argues that the existing garden to 24 Pages Walk is to the north of the house and therefore explains that the sunlight availability is already low because of this reason.

144. 1-34 Harold Estate

All windows at this property meet the BRE VSC recommendations with the exception of two windows. However, these two windows serve the entrance way and therefore not habitable. All of the rooms would also meet the daylight distribution guidelines. There would be good levels of daylight received at this property.

145. In terms of sunlight availability, the rooms would meet the BRE guidelines. There are three amenity areas associated with 1-34 Harold Estate (A1, A2 and A3). The results show that all but one area of amenity space (A3) would meet the BRE guidelines in terms of overshadowing targets. It is noted however, that this particular amenity space is currently irregular in shape and is small in size and has currently low levels of sunlight, but it also is part of the other two amenity areas. Given that the two other areas have very good levels of sunlight, it is not considered that there would be significant impact on the usability of these amenity spaces at 1-34 Harold Estate.

146. 20 Crimscott Street

All main habitable room windows meet the VSC recommendations with the exception of two windows on the second floor (10 & 11). It is noted that Window 11 is one of two windows serving a room and as the other window meets the guidelines, it is considered that the room would have satisfactory daylight levels. Window 10 serves a bedroom and the BRE guidelines does note that daylight in bedrooms is less important than in other habitable rooms such as kitchens and living rooms. The results are similar for the proposed bedroom window and living room window on the third floor.

147. The daylight distribution test shows that all but one room would not meet the BRE targets. This however serves a bedroom and the same reason outlined above would apply.
148. The results confirm that all main habitable living room windows (that face within 90 degrees of due south) meet the BRE direct sunlight to windows requirements. There are no nearby gardens or amenity areas directly to the north of the development and therefore no overshadowing analysis has been carried out.
149. Pages Walk Amenity space
This space is to the west of the development site and is not attached to any property.
The results of the overshadowing test show that sunlight availability to this amenity space after the development will be no less than 0.99 its former value. The proposed development therefore passes the BRE overshadowing to gardens and open spaces test.
150. Conclusion on daylight and sunlight impacts
Following the review of the analysis, it is considered that overall the proposed development would not have a significant detrimental impact on the neighbouring occupiers in terms of daylight and sunlight availability.

Overlooking of neighbouring properties

151. In order to prevent harmful overlooking, the Residential Design Standards SPD (2015) 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.
152. The site to the south (No. 33 Pages Walk) and the buildings immediately to the rear of the development (Nos. 21 – 24 Crimscott Street) are in commercial use and therefore no overlooking issues are raised. The proposed development also does not propose any flank windows that might prejudice any future development at 33 Pages Walk. The site to the north is a shared servicing yard and therefore no privacy issues would be anticipated. No. 20 Crimscott Street to the rear does have residential units on the upper floors, but there are only two windows directly facing the development site. Given that the proposed development is in commercial use and a condition could be imposed to secure obscured glazing on those rear windows in the proposed development it is not considered that there would be significant overlooking to No. 20 Crimscott Street. The communal roof terrace is set back from the parapet to protect the privacy of any future development in the surrounding locality. The properties on the western side of Pages Walk opposite the site would be of sufficient distance away from the proposed building and therefore no significant privacy issues envisaged.

Transport considerations

153. 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.
154. The Mayors Transport Strategy (MTS) Mayors Transport Strategy (MTS) includes three strategic challenges that are of significant importance to assessing this application.
- Vision Zero
 - Healthy Streets
 - Air Quality

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.

155. The site has a PTAL rating of 4 which is considered to be 'good' in terms of accessibility to public transport.

Trip Generation

156. In summary, the proposed development is forecast to generate an additional 324 public transport trips, 139 walk trips and 45 cycle trips per day (from a current 8 car driver trips, 51 public transport trips, 22 walk trips and 7 cycle trips per day). Given that this is a car-free scheme within a controlled parking zone (CPZ), any car driver trips have been reassigned to other modes of travel. Given the low number of motorised vehicle trips to the site, the main modes of travel are either by bicycle or public transport.
157. 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. The proposal is forecast to generate no car driver trips, 375 public transport trips, 162 walk trips and 52 cycle trips per day.
158. It is important to consider the trips during peak hour. In terms of peak hour (08:00-09:00) impact on public transport services the proposed development would lead to:
- 27 additional Underground passengers
 - 9 additional train passengers

- 30 additional bus passengers.
159. These vehicle movements would not generate any significant adverse impact on the existing movements on the adjoining roads. It is not considered that the proposed development would impact on the local highway network in terms of trip generation.
160. As a borough, Southwark agrees with TfL that bus services will need to be increased in the area ahead of the Bakerloo Line Extension (BLE) to accommodate the demand generated by additional homes and jobs generally in the Old Kent Road area in advance of the opening of the planned BLE. Given that the bus passengers are not considered to be excessive for this non-residential scheme, there is no requirement for a contribution towards bus services.
161. A condition would also ensure that no future occupiers of the proposed development could obtain parking permits in this CPZ.

Servicing and delivery

162. A new inset loading bay will be provided on Page's Walk adjacent to the site with a new widened footway running around the back of the loading bay. A delivery generation assessment has been carried out for the proposed scheme to determine the number of deliveries that would be made. The office element of the scheme has been forecast to generate a total of 14 deliveries per day. The maker space / artists studios will likely attract an additional number of deliveries on an ad-hoc basis. The baseline surveys to be carried out once the development has been brought in to use will identify site specific servicing requirements which will form the basis of the full Delivery & Servicing Plan. This will be secured in the s106. These deliveries are likely to be made by a variety of vehicle types ranging from bike / motorbike couriers, cars, small vans and other types up to the largest of a 7.5 tonne van.
163. The proposed level surface loading bay in-set in to a widened footway on Page's Walk to the west of the site would be able to accommodate peak delivery demand. The proposed bay would be secured in a section 278 agreement with the Council's Highways Authority.
164. It is proposed that the development will be refuse serviced by a private refuse contractor. The private waste contractor's vehicle will stop on Page's Walk and bins will be transferred from the refuse store at the rear of the site by private refuse contractor staff to the waiting refuse vehicle. The proposed bay would mean there is no need to use the shared servicing yard. As a private refuse collection arrangement, site management will be able to specify times of collection to avoid peak hours and vehicle sizes.
165. 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 OKR OA enter into Delivery Service Plan Bonds against their baseline figures for all daily servicing and delivery trips. In this instance however; the

small number of trips for a non-residential development makes it difficult to apply the DSP bond in a worthwhile manner. Therefore it is recommended that a contribution of £5,000 is sought to the extension of the Santander cycle hire. This contribution will be secured through the S106 Agreement.

Site layout and shared servicing yard

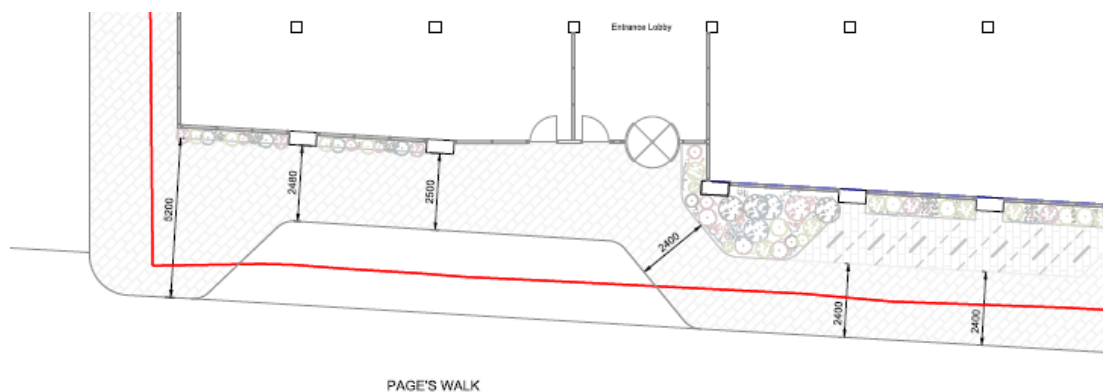
166. There is a shared access between the plumbing merchants and the site. Currently the service yard is used for customer and staff parking for the Wolseley plumbing merchants and the digital printing service industrial unit to the east of the site. There is currently no parking along the northern frontage of the propose site. Access to the shared parking area used by the neighbouring industrial units will be maintained at all times.
167. The access from the front of the site to the rear cycle parking and refuse store would be along the northern edge of the building. As part of the discussions with the applicant, the building footprint has been amended such that the pedestrian / cyclist route along the northern edge of the proposed building, will now fall within the application site's 'red line' boundary. This reduction in the width of the building is approximately 1m. This route would provide safe pedestrian and cycle access to the rear stores.

Active transport

Walking and the public realm

168. The application provides for wider footways and this will be delivered through the S278 Agreement. It is expected that the works would be designed to meet the Southwark Streetscape Design Manual standards. The development is also considered to improve the pedestrian experience when moving past and visiting the site. The improved pedestrian footway with the provision of planting along the edge of the proposed building would enhance the public realm.

Plan: New footpath with landscaping and distances



Cycling

169. Crimscott Street and Pages' Walk form part of Quietway Cycle Route 1 which runs from Deptford to Southbank and London Cycle Route 22 which runs from London Bridge to Orpington. The site is also in close proximity to Cycle Superhighways 6 and 7. A total of 56 long stay spaces are proposed on the ground floor and 14 short stay visitor space are proposed in front of the building. The applicant has proposed a mix of double-stacked stands, Sheffield stands and wide-space stands. This complies with the London Plan standards. It is noted it falls short of the Southwark Plan standards but this application has been in since April 2020 and the Southwark Plan was adopted only this Spring. It is considered that there should be some flexibility in this. Furthermore, given the type of use proposed here and more commonly seen with office workers it is possible to secure further details of cycle storage plus the provision of Brompton style cycle lockers. The Brompton Lockers offer a flexible option to workers in the development A condition is attached to this decision required detailed design of the cycling parking provision. Officers would also highlight that the applicant has agreed to pay a contribution towards cycle hire docking station. It is considered that the minor shortfall in cycle storage is not considered to cause an adverse impact to warrant a refusal alone and should be accepted in this instance.

Construction

170. An Outline Construction Logistics Plan has been submitted with the application. The S106 would secure a detailed Demolition and Construction and Environmental Management Plan (DEMP and CEMP). This is for the Council to manage cumulative impacts on the highways and environment.

Conclusion on Transport

171. The development is supported because it provides improved and good quality pedestrian and cycle facilities. It reduces car dependency and would not have a significant impact on public transport services. It would have appropriate management to reduce the impact of servicing and delivery, subject to the s106 obligations and conditions.

Archaeology

172. The site is located within the 'North Southwark and Roman Roads' Tier 1 Archaeological Priority Area (APA), 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.
173. 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.

174. The applicant has submitted a desk based assessment and has discussed the requirements for a pre-commencement archaeological evaluation. The scheme had previously proposed a basement but that has been omitted from the scheme following revisions. The Council's Archaeology Officer has reviewed this and raises no objection to the application, but has recommended conditions to secure the archaeological interests of the site. The archaeological evaluation works will need to include geoarchaeological assessment and the examination of any site investigation works to ensure an understanding of the underlying geoarchaeology.

Environmental considerations

Flood risk and water resources

175. 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.
176. Policy P68 (Reducing flood risk) of the Southwark Plan states that development must be designed to be safe and resilient to flooding and finished floor levels are set no lower than 300mm above the predicted maximum water level where they are located within an area at risk of flooding. Additionally, major development is required to reduce surface water run-off to green field run-off rates, and this must be through the application of water sensitive urban design and SuDS.
177. The applicant has submitted a Flood Risk Assessment (FRA). The Environment Agency (EA) has reviewed the submitted information in relation to flood risk and has no objection to the proposed development. The EA had reviewed the initial scheme which was for mixed residential. No comments have been received on the amended commercial use development, but it is considered that any flood risk would be less than previously predicted. Furthermore, the commercial use would be a less vulnerable use.
178. The proposal has also been reviewed by the Council's Flood and Drainage Engineer and it was recommended that additional information on the drainage hierarchy, run-off rates and maintenance was required. The applicant supplied these and the Flood and Drainage Engineer was satisfied with the information submitted.
179. The applicant proposes several drainage features including rainwater harvesting via rainbutts, a green roof, raingardens and rain planters, permeable paving and geocellular attenuation tanks.

180. The attenuation volume proposed (57.4 m³) is equal to or greater than the attenuation volume required (55 m³). It has been demonstrated that the site will not flood as a result of the 1 in 30 year rainfall event, that there will be no flooding of buildings as a result of events up to and including the 1 in 100 year rainfall event, and on-site flow as a result of the 1 in 100 year event with a climate change consideration will be suitably managed via adjusting site levels so that exceedance flows go away from buildings and towards the highway which has a low likelihood of surface water flooding. It is recommended that the mitigation measures outlined in the report be provided and this can be secured via a condition.

Fire

181. 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.
182. The submitted strategy demonstrates how the development would achieve the highest standards of fire safety, including means of escape, fire safety features and means of access for fire service personnel. The provision of a suitably-sized evacuation lift is also proposed in line with Policy D5 of the London Plan. The strategy details the cross laminated timber construction and notes the treatment that might be required. It details the kind of tests required before more detailed materials (post RIBA Stage 2) that might be needed and demonstrates that the applicant has considered this aspect. Given that the submitted strategy does not finalise details of construction methods and materials, a pre-commencement condition requiring the submission of a finalised Fire Strategy to be approved in writing by the Council is attached to this decision

Ground conditions and contamination

183. Given the nature of the site, use and surrounding uses, there is the potential for contamination at the site. The applicant submitted a Phase 1 Land Quality Assessment (in respect of land contamination). The Council's Environmental Protection Team (EPT) has reviewed the report and support the requirement that a phase 2 assessment should be carried out. A condition has been recommended by EPT to secure any further remediation strategies.
184. Environmental Agency Officers also agree with the findings of the submitted report and raise no objection.

Air quality

185. The site is located in an Air Quality Management Area (AQMA) and an Air Quality Assessment has been submitted, which considers the air quality

impacts arising from the construction and use of the development. 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.

186. An Air Quality Assessment was submitted and was prepared to determine the likely air quality impacts from the redevelopment of the site on existing and introduced receptors. It was noted that there are a number of residential receptors in the vicinity which could be affected by changes in air quality arising from construction and demolition activities associated with the development. Commercial and industrial premises in the area will also be sensitive to dust. No ecological receptors have been identified within 200 m of the development site.
187. The results of the dust risk assessment indicate that construction activities may have, at worst, medium air quality impacts at nearby receptors without mitigation. These impacts can be minimised or removed through the implementation of a construction phase dust management plan detailing the appropriate mitigation measures and dust monitoring. A DEMP and CEMP will be secured to ensure mitigation measures would be in place. EPT also agree with the findings and raised no objections.
188. The air quality neutral assessment has found that the proposed development will fully meet the air quality neutral requirements in respect of transport and building emissions.

Noise and vibration

189. A Noise Impact Assessment has been submitted and reviewed by EPT. Noise sensitive receptors with a potential to be affected by new noise sources associated with the development such as external building services plant include the existing residential dwellings on Swan Mead and Page's Walk. Since the revisions, there are no longer habitable rooms proposed within the new building. The section of the assessment related to achieving the internal ambient noise criteria of BS 8233:2014 for residential habitable rooms is no longer applicable to the proposed scheme. A condition to ensure the plant does not exceed background sound level has been recommended.

Odour

190. The scheme had originally proposed a café associated with the ground floor industrial uses. Since the revisions have been submitted, this element of the scheme has been omitted. EPT had originally commented that further details regarding ventilation and extraction should be secured via a condition, but since the omission of the café space from the plans Officers do not consider this to be necessary.

Agent of change

191. 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.
192. The proposed development would go from an established light industrial use to a mixed light industrial and office building. The surrounding area would likely see mixed residential and industrial uses coming forward and it is therefore considered that the subject scheme will not harm the operation of the existing neighbouring businesses and will mitigate any noise generated through the uses through the design of the scheme and thereby complies with London Plan Policy D13.

Sustainable development implications

Energy

193. 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.
194. 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 non-residential developments must reduce carbon emissions by at least 40% 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.
195. An Energy Strategy Report based on the Mayor's hierarchy has been submitted by the applicant. This details how the targets for carbon dioxide emissions reduction are to be met. A combination of 'Be Lean' 'Be Clean' and 'Be Green' measures have been employed in an attempt to achieve the reduction in line with the GLA guidance on preparing energy statements, P70 of the Southwark Plan 2022, and the Southwark Sustainable Design and Construction SPD.

Be Lean (use less energy)

196. 'Be lean' refers to the approach taken by the design team to maximise the positive aspects of the scheme's passive design to minimise the base energy

demand of the buildings. As part of this application, key passive ('Be Lean') design features include:

- Improving U-values
- Improving air permeability
- The building aligns with the road and maximises the passive solar gains into the building throughout the day
- Energy efficiency lighting

197. The development achieves a 15% reduction in overall carbon emissions over Part L 2013, through passive design and energy efficiency measures alone. The energy efficient building elements have been incorporated into the build including; improved 'U' values, orientation of rooms, high efficiency lighting,

Be Clean (supply energy efficiently)

198. A connection to a District Heat Network (DHN) provides a supply of low carbon heat to homes, businesses and public buildings. There is currently a single District Heat Network (SELCHP DHN) for Old Kent Road. SELCHP is a waste incinerator in Lewisham which generates heat and electricity that can be used to power homes. The Council support the delivery of further DHNs with low or net zero heat sources that use land efficiently. The draft AAP states that gas boilers are the largest source of carbon emissions within the borough, so new gas boilers in new developments will not be permitted unless they are an interim solution before a low carbon solution is implemented.

199. The applicant had originally noted in their energy strategy that the network expansion of the SELCHP towards Old Kent Road is not complete, and the London heat map could not find any existing DHN networks within a 1km radius from the property. When the SELCHP network is fully extended, it will be 400m southeast of the site. Following discussions with the applicant it has been agreed that is flexible to joining a future district heat network once the network is fully extended and the connection is considered viable by SELCHP. The scheme design will be future proofed to allow connectivity to the SELCHP DHN when it becomes available in the future and would be secured through the s106 agreement. At this stage, there would be no on-site Be Clean measures adopted in this scheme. The carbon savings at this stage would be 0%. Nevertheless, the applicant would be committed by the s106 agreement to connect to the future DHN.

Be Green (Low or Carbon Zero Energy)

200. ASHP's and Photovoltaic (PV) Panels are the green/renewable energy technologies that have been considered suitable for the proposed development. The ASHP's has been suggested for the space heating, hot water and cooling systems. The PV panels would be placed on the roof adjacent to the communal terrace. The ASHP's and PV's are expected to provide a further 33% improvement over Part L 2013 following the passive design/energy efficiency measures.

201. Taking into consideration the measures assessed in this section of the report, the development exceeds the minimum 40% improvement over Part L Building Regulations, achieving on site reductions of 49%. As noted above, if the development can connect to the DHN, the savings figure of 49% will substantially increase. For the development, without connection to the DHN, to achieve the full 'Zero Carbon' target on site a contribution to the Borough's carbon offset fund will be required. The carbon shortfall of 23 tonnes CO₂ per annum amounts to £65,552. The overall contribution has been agreed with the applicant, and the shortfall amount is secured in the S106 Agreement. The S106 Agreement will also include the obligation of requiring the development to be constructed in accordance with the Energy Assessment.

Overheating

202. London Plan Policy S14 and Policy P69 of the Southwark Plan 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).

203. The proposed development has been designed to reduce cooling demand and overheating risks. There would be the use of shading measures. Fresh air into the spaces will be provided by both mechanical and passive means of ventilation. Ventilation to office spaces has been designed to deliver a rate of 12 l/s/person based on an occupancy rate of 1 person per 10m². The façade windows can be opened to provide natural ventilation and serve to purge exhaust air from the spaces and let fresh air into the offices.

BREEAM

204. 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 preliminary BREEAM assessment for the proposed development was undertaken. The pre-assessment results demonstrate that the development is being designed to achieve a BREEAM New Construction rating of 'Excellent', in accordance with P69 of the Southwark Plan.

Planning obligations (Section 106 undertaking or agreement)

205. Southwark Plan Implementation Policy IP3 and Policy DF1 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. IP3 of the Southwark Plan Aims to ensure that any potential adverse impact that makes a proposed development unacceptable will be offset is mitigated by using planning conditions in the first instance. Additionally, and where they meet the required tests, Section 106 legal agreements that either a) mitigates the impact or b) pay the council a financial contribution to enable the council to will be used to mitigate the impact. 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

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

Planning obligation	Mitigation	Applicant's position
Local Economy and Workspace		
Employment and training (at the end phase)	26 jobs set aside after completion for unemployed Southwark residents	Agreed
Affordable workspace	Minimum 10% affordable workspace in Class E(g)(iii) use at £12 per sqft inclusive of service charge, insurance and VAT. Appointment of workspace co-ordinator	Agreed
Transport and Highways		
Public Transport Infrastructure Contribution	A contribution towards the provision of a TfL Cycle Hire Docking Station (£5,000)	Agreed
Highway works	s.278 works with the highway authority for highway works, tree planting and traffic management change.	Agreed

Parking permit restriction	This development would be excluded from those eligible for car parking permits under any future CPZ operating in this locality.	Agreed
Energy, Sustainability and the Environment		
Futureproofing for connection to District Heat Network (DHN)	Prior to occupation, an Energy Strategy must be approved setting out how the development will be designed and built so that it will be capable of connecting to the District CHP in the future.	Agreed
Achieving net carbon zero	An off-set payment of £65,552	Agreed
Archaeology monitoring/ supervision fund	Contribution towards cost of providing technical archaeological support (£3,389 for schemes under 5,000sqm)	Agreed
Achieving Greenfield rates	(£366 per cubic metre shortfall against greenfield run off rates)	Agreed
Administration fee	Maximum contribution to cover the costs of monitoring these necessary planning obligations, calculated as 2% of total sum	Agreed

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

- Marketing, allocation and fit out of the commercial units
- Servicing bay/Site management plan;
- London Living Wage – best endeavours to being offered to all staff employed in the commercial units as well as workers during the construction period;
- Final Demolition and Construction Environment Management Plans;
- Securing Craftworks Architects to deliver the building detailed design, unless otherwise agreed in writing
- Workspace Specification (including full M&E fit out);
- Triggers securing Practical Completion of workspace;

- Affordable Workspace Management Plan, including marketing requirements;
208. The S106 heads of terms agreed would satisfactorily mitigate against the adverse impacts of the proposed development.
209. In the event that a satisfactory legal agreement has not been entered into by 28 February 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 workspace and mitigation against the adverse impacts of the development through projects or contributions in accordance with Policy IP3 ‘Community infrastructure levy (CIL) and Section 106 planning obligations’ of the Southwark Plan (2022), and London Plan (2021) policy DF1 ‘Delivery of the Plan and Planning Obligations’, as well as guidance in the council’s Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015)”.

Mayoral and Southwark Community Infrastructure Levy (CIL)

210. 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.
211. The site is located within Southwark CIL Zone 2 and MCIL2 Band 2 zone. Based on the floor areas provided in the agent’s revised CIL Form1 dated 29-Jun-21 and proposed floor areas in Area Schedule published (Feb 2022 update), the gross amount of CIL is approximately £171,191.28, all Mayoral CIL. It should be noted that this is an estimate, and the floor areas will be checked when related CIL Assumption of Liability Form is submitted after planning approval has been obtained

OTHER MATTERS

212. None.

Statement of community involvement

213. Consultation was carried out by the applicant prior to the submission of the planning application, and during the consideration of the application. The consultation undertaken was carried out with the local community and key

stakeholders from the area. This is summarised in the tables below, which are taken from the submitted Statement of Community Involvement.

Table: List of meetings and events

Meetings	Date	Attendees	Summary of discussions
Pre application meetings	11/12/2017 01/07/2019 18/11/2019	Council officers	Discussion of land use. Discussions and concerns raised regarding the height, bulk and architecture. Requests that applicants submit a PreApplication Engagement Plan and carry out public consultation as part of the pre-application process
Public exhibition at 231 Old Kent Road	16/12/2019	Number of attendees: 7, majority of which Page's Walk residents	Attendees complimented the design of the development and the benefits of redevelopment. The main expressed concerns were height and predominantly commercial development. Concerned over the possibility of increased traffic and disruption during construction and potential impact of further development on local services and existing infrastructure.
Public webinar (original proposal for residential	24/09/2020	Members of the public and local residents	10 members attended and 36 questions were asked.

and workspace)			<p>The following questions were raised (in summary): Height of the building, impact such as overlooking, the uses on the ground floor including the café, the materiality including glass façade, who the homes would be for, traffic and parking, potential of disruption from construction,</p> <p>There were also questions raised regarding the consultation process the applicant undertook.</p>
Public webinar (following amendments to the scheme)	20/05/2021	Members of the public and local residents	<p>7 members attended and questions were asked.</p> <p>The following questions were raised (in summary): Height of the building, demand for office space post-COVID, quantum of affordable workspace, current uses on site and squatting, how the carbon reductions were calculated and whether the embodied carbon of the current building is included in the calculation.</p>
Public website	www.botanybuilding.co.uk, was first launched on Monday 14 September 2020 and updated on	To June 2021, the website has had 876 page views from 394 unique visitors.	

	Friday 14 May 2021.		
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214. Letters were also sent out to key stakeholders including local councillors, Cabinet members, Member of Parliament for Bermondsey and Old Southwark and others. No response were received from members.

Conclusion on planning issues

215. The major redevelopment of the site is supported and welcomed in principle. The principle of a commercial/office scheme on the site is also accepted, and would be in line with policy aspirations to increase the number of employment opportunities within OKR 2.
216. The increased provision of commercial floorspace and employment floorspace compared to the existing site, along with the introduction of Affordable Workspace to the ground floor unit is considered to be a major benefit of the scheme.
217. The building would be positioned to allow for a minimum of 2.4m wide footway. The building is set back from the kerb line to allow for pedestrian access and the public realm and experience would be improved with low level planting and new paving. It would improve the circulation and movement along this part of the street. The proposal would activate this part of Pages Walk. The development would also provide substantial gains in biodiversity, and provides a 0.49 increase in urban greening on site.
218. 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. It is not considered that the loss would be significant. Any overlooking to neighbouring occupiers is minimised.
219. The scheme has been amended and the materiality would now be in context with the character of the surrounding area. The proposed architecture is influenced by the warehouse typology and with sufficient and modulation on the facades. The reduction in height and width and set back on the upper floors would reduce the overall bulk. The height complies with the draft AAP requirements and would not significantly impact on the character or appearance of the adjoining Pages Walk Conservation Area or the nearby heritage assets.
220. The scheme would be designed to minimise environmental effects and adequate mitigation measures would be in place, which would be secured by conditions.
221. It is therefore recommended that planning permission be granted subject to conditions, and the applicant entering into a Section 106 Legal Agreement under the terms as set out above.

Human rights implications

222. This planning application engages certain human rights under the Human Rights Act 1998 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.

223. This application has the legitimate aim of providing new commercial development. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

224. None

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 5729 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	Wing Lau, Team Leader	
Version	Final	
Dated	14 October 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		24 October 2022

RECOMMENDATION

Applicant	SOUTHWARK COUNCIL		
Application Type	Full Planning Application		
Recommendation	Grant subject to s106 agreement	Case Number	20/AP/1120

Draft of Decision Notice

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

Demolition of existing buildings and erection of a six-storey building comprising flexible co-working offices, workshop/artist studios (Use Class E(g)), together with associated public realm improvements, roof terrace, landscaping, secure cycle storage facilities and associated works

At: Sultra House, 29-31 Pages Walk, London

In accordance with application received on 02/12/2020

- 1 The development hereby permitted shall not be carried out otherwise than in accordance with the following approved plans:
 - 101-P-100-P7 - Proposed Ground Floor Plan
 - 101-P-101-P4 - Proposed Typical Plan Office Floors 1-3
 - 101-P-104-P2 - Proposed Typical Plan Office Floors 4-5
 - 101-P-109-P4 - Proposed Roof Plan
 - 101-P-200-P6 - Proposed West Elevation
 - 101-P-201-P6 - Proposed North Elevation
 - 101-P-202-P5 - Proposed East Elevation
 - 101-P-203-P6 - Proposed South Elevation
 - 101-P-210-P3 - Proposed Detail West Elevation A
 - 101-P-211-P3 - Proposed Detail West Elevation B
 - 101-P-300-P3 - Proposed Section AA

101-P-301-P4 - Proposed Section BB

101-P-302-P3 - Proposed Section CC

101-P-303-P4 - Proposed Section DD

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 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:

- o A detailed specification of demolition and construction works at each phase of development including consideration of all environmental impacts and the identified remedial measures;
- o Site perimeter continuous automated noise, dust and vibration monitoring;
- o Engineering measures to eliminate or mitigate identified environmental impacts e.g. hoarding height and density, acoustic screening, sound insulation, dust control measures, emission reduction measures, location of specific activities on site, etc.;
- o Arrangements for a direct and responsive site management contact for nearby occupiers during demolition and/or construction (signage on hoardings, newsletters, residents liaison meetings, etc.)
- o A commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme; Site traffic - Routing of in-bound and outbound site traffic, one-way site traffic arrangements on site, location of lay off areas, etc.;
- o Site waste Management - Accurate waste stream identification, separation, storage, registered waste carriers for transportation and disposal at appropriate destinations.
- o A commitment that all NRMM equipment (37 kW and 560 kW) shall be registered on the NRMM register and meets the standard as stipulated by the Mayor of London

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

- o Southwark Council's Technical Guide for Demolition & Construction at <http://www.southwark.gov.uk/construction>
- o Section 61 of Control of Pollution Act 1974,
- o The London Mayors Supplementary Planning Guidance 'The Control of Dust and Emissions During Construction and Demolition',
- o The Institute of Air Quality Management's 'Guidance on the Assessment of Dust from Demolition and Construction' and 'Guidance on Air Quality Monitoring in the Vicinity of Demolition and Construction Sites',
- o BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Noise',
- o BS 5228-2:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Vibration'
- o BS 7385-2:1993 Evaluation and measurement for vibration in buildings. Guide to damage levels from ground-borne vibration,
- o BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings - vibration sources other than blasting,
- o Relevant Stage emission standards to comply with Non-Road Mobile Machinery (Emission of Gaseous and Particulate Pollutants) Regulations 1999 as amended & NRMM London emission standards <http://nrmm.london/>

All demolition and construction work shall be undertaken in strict accordance with the approved CEMP and other relevant codes of practice, unless otherwise agreed in writing by the Local Planning Authority.

Reason

To ensure that occupiers of neighbouring premises and the wider environment do not suffer a loss of amenity by reason of pollution and nuisance, in accordance with Southwark Plan 2022 policies P50 ('Highways impacts') and P56 ('Protecting amenity'), policy T4 ('Assessing and mitigating transport impacts') of the London Plan 2021 and the National Planning Policy Framework 2021.

4 Archaeological Evaluation

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

Reason:

In order that the applicants supply the necessary archaeological information to ensure suitable mitigation measures and/or foundation design proposals be presented in accordance with Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2021.

5 Archaeological Mitigation

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

Reason:

In order that the details of the programme of works for the archaeological mitigation are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site in accordance with Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2021.

6 Site Contamination

a) Prior to the commencement of development works other than demolition, any subsequent Phase 2 (site investigation and risk assessment) shall be conducted in accordance with any approved scheme and submitted to the Local Planning Authority for approval prior to the commencement of any remediation that might be required.

b) In the event that contamination is present, a detailed remediation strategy to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment shall be prepared and submitted to the Local Planning Authority for approval in writing. The scheme shall ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. The approved remediation scheme (if one is required) shall be carried out in accordance with its terms prior to the commencement of development, other than works required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority shall be given two weeks written notification of commencement of the remediation scheme works.

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

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

Reason:

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems,

and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P64 (Contaminated land and hazardous substances), and the National Planning Policy Framework 2021.

7 Detailed Drainage Design

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 40% climate change allowance, as detailed in the Flood Risk Assessment prepared by GeoSmart dated May 2021 and Sustainable urban Drainage Scheme (SuDS) strategy prepared by GeoSmart dated January 2022 and subsequent accompanying information. 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).

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.

8 Fit Out of Class E (g) (iii) Units

Before any work above grade hereby approved begins (excluding superstructure demolition and site preparation), full particulars and details of a scheme for the fit out of the premises to an appropriate level for E (g) (iii) use shall be submitted to and approved by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any approval given. This should include details of the mechanical and electrical fit out of the units, showing heating and cooling provision, the inclusion of sprinkler systems for fire safety purposes and the provision of kitchen and toilet facilities. The development shall not be carried out otherwise than in accordance with any approval given, and practical completion of the E (g) (iii) fit out shall be at the same time, or before the practical completion of the residential component of the same phase.

Reason:

In granting this permission the Local Planning Authority has had regard to the special circumstances of this case in accordance with P30 Office and Business Development of the Southwark Plan 2022, Policy E7 Industrial intensification, co-location and substitution of the London Plan 2021 and The National Planning Policy Framework 2021.

9 Hard and Soft Landscaping

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

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

Reason:

So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2021, 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.

10 Biodiverse Green Roofs

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

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

The biodiversity (green/brown) roof(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).

11 Landscape Management Plan

Before any above grade work hereby authorised begins, a landscape management plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas (except privately owned defensible space), shall be submitted to an approved in writing by the Local Planning Authority. The landscape management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

Reason:

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

12 Swift Bricks

Details of swift bricks shall be submitted to and approved in writing by the Local Planning Authority prior to any above grade façade works of development commencing.

No less than 12 swift 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. The nesting bricks shall be installed strictly in accordance with the details so approved, shall be maintained as such thereafter.

Discharge of this condition will be granted on receiving the details of the nest/roost features and mapped locations and Southwark Council agreeing to the submitted plans, and once the nest/roost features are installed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the 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); P56 Protection of amenity, P57 Open space, P58 Open Water space, P59 Green infrastructure, P60 Bioiversity, P66 Reducing noise pollution and enhancing soundscapes and P69 Sustainable standards of the Southwark Plan (2022).

13 Materials Schedule and On-Site Presentation of Samples

Before any façade works of development hereby authorised begins:

- a) A materials schedule providing the specification of materials to be used in the approved elevations in constructing the development hereby approved shall be submitted to and approved in writing by the LPA;
- b) Sample panels of facing materials and surface finishes for the elevations, each to be at least 1 square metre in surface area, shall be presented on site (or an alternative location agreed with the Local Planning Authority) to and thereafter approved in writing by the Local Planning Authority.

The development shall be carried out in accordance with any such approval given in relation to parts a) and b) above.

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.

14 Digital Connectivity

Prior to any above grade works for each phase of the development hereby approved, detailed plans shall be submitted to and approved in writing by the local planning authority demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within 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.

15 Lifts

Prior to commencement of works above grade of development hereby approved, 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.

16 Secure By Design

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

17 Cycle store

Before any above grade work hereby authorised begins details and drawings of the facilities to be provided for the secure and covered storage of cycles including cycle hire lockers shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the cycle parking facilities provided shall be retained and the space used for no other purpose and the development shall not be carried out otherwise in accordance with any such approval given.

Reason:

In order to ensure that satisfactory safe and secure cycle parking 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.

18 BREEAM

(a) Before any fit out works to the Class E 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 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.

19 Fire Safety Strategy

Before any above grade work hereby authorised begins, a final Fire Strategy shall be submitted to and approved in writing by the Local Planning Authority.

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.

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.

20 External Lighting

Prior to occupation of the development, details of any external lighting (including: design; power and position of luminaries; light intensity contours) of all affected external areas (including areas beyond the boundary of the development) shall be submitted to and approved by the Local Planning Authority in writing for that phase and installed as per the approval given.

Any external lighting system installed at the development shall comply with the Institute of Lighting Professionals (ILP) Guidance Note 1 for the reduction of obtrusive light (2020). Information should include a bat-friendly lighting plan, including lighting specification using LED's (at 3 lux) at a recommended spectrum of 80% amber and 20% white with a clear view, no UV, and no horizontal light spread ideally less than 70° and timers in relevant parts of the site. A 3D plan of the illumination level should be submitted to enable assessment of the potential impact on protected species.

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').

21 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 BS4142:2014. Prior to the plant being commissioned a validation test shall be carried out following completion of the

development. The results shall be submitted to the LPA for approval in writing. The plant and equipment shall be installed and constructed in accordance with the approval given and shall be 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.

22 Urban Greening Certification

a) Prior to first occupation of the development hereby consented, an interim report/letter (together with any supporting evidence) from a suitably qualified landscape specialist shall be submitted to and approved in writing by the LPA. The report/letter shall confirm that sufficient progress has been made in terms of detailed design, procurement and construction to be reasonably well assured that the development hereby approved will, once completed, achieve or exceed the agreed UGF score of 0.49.

b) Within six months of first occupation of the development hereby permitted, a post construction certificate prepared by a suitably qualified landscape specialist (or other verification process agreed with the LPA) shall be submitted to and approved in writing by the LPA, confirming that the agreed UGF score of 0.49 has been met.

Reason:

To ensure the proposal complies with: the National Planning Policy Framework 2021; Policy G5 (Urban Greening) of the London Plan 2021 and policy P59 ('Green infrastructure') of the Southwark Plan 2022.

23 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.

24 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 prepared by GeoSmart dated May 2021 and Sustainable urban Drainage Scheme (SuDS) strategy prepared by GeoSmart dated January 2022, and subsequent accompanying information, and shall include plans, photographs and national grid references of key components of the drainage network such as surface water attenuation structures, flow control devices and outfalls. The report shall also include details of the responsible management company.

Reason:

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

25 Car Free Marketing

Prior to occupation of any part of the development, details of the marketing materials for the space shall be submitted and approved in writing by the local planning authority clearly identifying the development as predominantly car free and that occupiers should sign acknowledgement of the permit free status of this development.

Reason:

To ensure compliance with P54 of the Southwark Plan 2022.

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.

26 Air Quality

The development shall achieve full compliance with the air quality assessment mitigation measures as detailed in Air Quality Assessment produced Southdowns dated December 2019.

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.

27 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.

28 Energy Efficiency

The development hereby permitted shall be constructed in accordance with the approved Energy Strategy Report produced by Syntegra dated June 2021. 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.

29 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.

30 Employment accommodation

The upper floors of the development hereby approved shall not be occupied until the ground floor commercial units have been fitted out in accordance with the approved E class fit out details, unless otherwise agreed in writing by the Local Planning Authority.

Reason:

To ensure that occupiers of neighbouring residential properties do not suffer a loss of amenity by reason of noise nuisance from fit out works after residential accommodation has been occupied, in accordance with the National Planning Policy Framework 2021 and Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes).

31 Piling

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

Reason:

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

32 Piling Method Statement

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

Reason:

The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure.

33 Obscure Glazing

The window(s) on the eastern elevation of the building shall be obscure glazed and fixed shut and shall not be replaced or repaired otherwise than with obscure glazing.

Reason:

In order to protect the privacy and amenity of the occupiers and users of the adjoining premises at 20 Crimscott Street from undue overlooking in accordance with Chapter 8 (Promoting healthy and safe communities) of the National Planning Policy Framework (2021); Policy D4 (Delivering good design) of the London Plan (2021); and Policy P56 (Protection of amenity) of the Southwark Plan (2022).

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

34 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, 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.

Informative notes to the applicant relating to the proposed development

THAMES WATER

1. 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.

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. <https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services>

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

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your->

development/Working-near-or-diverting-our-pipes. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

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.

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:

Section 2 - Achieving sustainable development

Section 6 - Building a strong, competitive economy

Section 7 - Ensuring the vitality of town centres

Section 8 - Promoting healthy and safe communities

Section 9 - Promoting sustainable transport

Section 11 - Making effective use of land

Section 12 - Achieving well-designed places

Section 14 - Meeting the challenge of climate change, flooding and coastal change

Section 15 - Conserving and enhancing the natural environment

Section 16 - Conserving and enhancing the historic environment

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:

Policy SD1 - Opportunity Areas

Policy SD10 - Strategic and local regeneration

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

Policy D3 - Optimising site capacity through the design-led approach

Policy D4 - Delivering good design

Policy D5 - Inclusive design

Policy D11 - Safety, security and resilience to emergency

Policy D12 - Fire safety

Policy D13 - Agent of Change

Policy D14 - Noise

Policy E1 - Offices

Policy E2 - Providing suitable business space

Policy E3 - Affordable workspace

Policy E11 - Skills and opportunities for all

Policy G1 - Green infrastructure

Policy G5 - Urban greening

Policy G6 - Biodiversity and access to nature

Policy SI 1 - Improving air quality

Policy SI 2 - Minimising greenhouse gas emissions

Policy SI 3 - Energy infrastructure

Policy SI 4 - Managing heat risk

Policy SI 5 - Water infrastructure

Policy SI 12 - Flood risk management

Policy SI 13 - Sustainable drainage

Policy T1 - Strategic approach to transport

Policy T2 - Healthy Streets

Policy T3 - Transport capacity, connectivity and safeguarding

Policy T4 - Assessing and mitigating transport impacts

Policy T5 - Cycling

Policy T6 - Car parking

Policy T6.5 - Non-residential disabled persons parking

Policy T7 - Deliveries, servicing and construction

Policy T9 - Funding transport infrastructure through planning

Southwark Plan 2022

SP4 – Green and inclusive economy

SP6 – Climate emergency

P13 – Design of places

P14 – Design quality

P16 – Designing out crime

P18 – Efficient use of land

P20 – Conservation areas

P21 – Conservation of the historic environment and natural heritage

P23 – Archaeology

P30 – Office and business development

P31 – Affordable workspace

P35 – Town and local centres

P49 – Public transport

P50 – Highways impacts

P51 – Walking

P53 – Cycling

P54 – Car parking

P56 – Protection of amenity

P59 – Green infrastructure

P60 – Biodiversity

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

IP3 – Community infrastructure levy (CIL) and Section 106 planning obligations

NSP57 – Crimscott Street and Pages Walk

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)

Southwark SPDs/SPGs

Design and Access Statements (2007)

S106 and CIL (2015)

S106 and CIL Addendum (2017)

Sustainability Assessments (2007)

Sustainable Design and Construction (2009)

Sustainable Transport (2009)

Southwark AAP's

Draft Old Kent Road Area Action Plan (December 2020)

APPENDIX 3**RELEVANT PLANNING HISTORY**Pre-application Advice

Pre-application advice was provided in advance of the submission of this application, details of which are held electronically by the Local Planning Authority under planning reference 17/EQ/0414. A number of meetings were held with the applicant and the main discussions were had over the height, massing and detailed architecture of the building. It was advised that the building should ideally be set further back. The land use was also debated and provision of affordable housing.

Planning History of Adjoining Sites

The Council has received a number of planning applications in this part of Old Kent Road Opportunity Area. These include the following:

21/AP/06811- 24 Crimscott StreetApplication type: FULL

Demolition of existing building and redevelopment to provide an eight storey (27.7m AOD) building comprising flexible Commercial, Business and Service floorspace (Class E(g)) along with public realm improvements, landscaping, private and communal amenity space, secure cycle parking, refuse and recycling facilities and other associated works.

Decision PENDING

15/AP/2474 – Rich Industrial Estate, Crimscott Street

Application type: FULL

Demolition of four existing buildings and electricity substation and the development of a phased mixed-use scheme ranging from 3-9 storeys plus basements (maximum height 34.03m AOD) comprising a series of new buildings and retained/refurbished/extended buildings to provide a total of 19,468sqm (GIA) of commercial, retail, art gallery and storage floorspace (Use Classes A1, A2, A3, B1, B8 and D1) and 406 residential units (Use Class C3) plus associated highway and public realm works, landscaping, car and cycle parking, infrastructure works and associated works.

Decision: Granted (7th December 2016)

17/AP/3170 – 18-19 Crimscott Street

Application type: FULL

Redevelopment of the site to provide a part 6 / part 9 storey building (plus basement) with 1835sqm GIA of Class B1 office floorspace and 55 residential units (Class C3) and associated car and cycle parking and landscaping.

Decision: Granted (4th May 2018).

19/AP/1286 – 20 Crimscott Street

Application type: FULL

Two storey extension above existing light industrial building to provide 9 new flats with associated cycle and waste storage.

Decision: Granted: (19th August 2019)

04/AP/1731 - 33 Pages Walk

A number of applications to redevelop this site were submitted and were either withdrawn or refused. The only one granted is the permission below but this has since lapsed.

Application type: FULL

Demolition of the existing single storey building and the erection of a new four storey building to be used for business purposes within Use Class B1

Decision: Granted (24th November 2004)

14/AP/3342 - Unit 6B The Willows 80 Willow Walk

Application type: FULL

Change of use from offices for car hire (Sui Generis) to use as offices within Class B1

Decision: Granted (5th November 2014)

APPENDIX 4**CONSULTATION UNDERTAKEN**

Site notice date:

Press notice date: 28.04.2020 and 26.10.2021

Case officer site visit date: 26.10.2021

Neighbour consultation letters sent: 29.05.2020 and 16.07.2021

Internal services consulted

Archaeology
Ecology
Environmental Protection
Highways Development and Management
Flood Risk Management & Urban Drainage
Transport Policy
Urban Forester
Waste Management
Section 106 Team and CiL team
Public Health
Local Economy

Statutory and non-statutory organisations

Environment Agency
Metropolitan Police Service (Designing Out Crime)
Thames Water
London Fire & Emergency Planning Authority
EDF

Neighbours and Contributors

Name/Address	Letter Template	Period	Date Printed	Reply by
1 Crimscott Street London Southwark SE1 5TE	Initial Notification			B28
	29/05/2020 26.06.2020 Recon. Letter - Neigh			BULK - NO EMAIL B21
	16/07/2021 06.08.2021			

Unit 2 Sixth Floor Rich Industrial Estate Crimscott Street London Southwark
 Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

43 Grange Road London Southwark SE1 3BH Initial Notification B28
 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL B21
 16/07/2021 06.08.2021

Flat 1 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

6 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

18 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

35 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Studio 1 41A Crimscott Street London Southwark SE1 5TE Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Unit 2 The Willows 80 Willow Walk London Southwark SE1 5SY Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Unit 7 Fourth Floor Unit 7A Rich Industrial Estate Crimscott Street London
 Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

Unit 2 Fourth Floor Unit 7A Rich Industrial Estate Crimscott Street London
 Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

Unit 5 Fourth Floor Unit 7A Rich Industrial Estate Crimscott Street London
 Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

Flat 60 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 35 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Unit 4 Fourth Floor Unit 7A Rich Industrial Estate Crimscott Street London
 Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

Flat 6 43 Grange Road London Southwark SE1 3BH Initial Notification B28
 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL B21
 16/07/2021 06.08.2021

Unit 7 Rich Industrial Estate Crimscott Street London Southwark SE1 5TE
 Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

Flat 2 43 Grange Road London Southwark SE1 3BH Initial Notification B28
 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL B21
 16/07/2021 06.08.2021

Rose Stapleton Terrace 16 Pages Walk London Southwark SE1 4SB Initial
 Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
 EMAIL B21 16/07/2021 06.08.2021

Unit 7A Fifth Floor Rich Industrial Estate Crimscott Street London Southwar
 Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

Flat 7 Arundel Buildings Webb Street London Southwark SE1 4AS Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 20 Arundel Buildings Webb Street London Southwark SE1 4AS Initial
 Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
 EMAIL B21 16/07/2021 06.08.2021

Unit 7A Ground Floor Rich Industrial Estate Crimscott Street London Southwa
 Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

Unit 4 The Willows 80 Willow Walk London Southwark SE1 5SY Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 10 Arundel Buildings Webb Street London Southwark SE1 4AS Initial
 Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
 EMAIL B21 16/07/2021 06.08.2021

Flat 3 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 6 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 10 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 81 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 78 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 75 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 74 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 80 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 76 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 82 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 79 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 77 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 41 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Unit 6B The Willows 80 Willow Walk London Southwark SE1 5SY Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

9 Burman Apartments 20A Crimscott Street London Southwark SE1 5TF Initial
 Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
 EMAIL B21 16/07/2021 06.08.2021

Flat 28 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 9 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 40 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Unit 8 Rich Industrial Estate 46 Willow Walk London Southwark SE1 5SF Initial
 Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
 EMAIL B21 16/07/2021 06.08.2021

Units 9 And 10 Third Floor Rich Industrial Estate Crimscott Street London S
 Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

Unit 15 To Unit 17A Rich Industrial Estate Crimscott Street London Southwar
 Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

Flat 86 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 72 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 52 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

87 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

72 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Unit 1 Fourth Floor Unit 7A Rich Industrial Estate Crimscott Street London
 Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

Unit 6A The Willows 80 Willow Walk London Southwark SE1 5SY Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Unit 7A Second Floor Rich Industrial Estate Crimscott Street London Southwa
 Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

Marshall House 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

18 Pages Walk London Southwark SE1 4SB Initial Notification B28
 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL B21
 16/07/2021 06.08.2021

83 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

34 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

1 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

61 Willow Walk London Southwark SE1 5SF Initial Notification B28
 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL B21
 16/07/2021 06.08.2021

Flat 48 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 5 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Studio 23 41A Crimscott Street London Southwark SE1 5TE Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Studio 18 41A Crimscott Street London Southwark SE1 5TE Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Studio 12 41A Crimscott Street London Southwark SE1 5TE Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

8 Burman Apartments 20A Crimscott Street London Southwark SE1 5TF Initial
 Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
 EMAIL B21 16/07/2021 06.08.2021

3 Burman Apartments 20A Crimscott Street London Southwark SE1 5TF Initial
 Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
 EMAIL B21 16/07/2021 06.08.2021

2 Burman Apartments 20A Crimscott Street London Southwark SE1 5TF Initial
 Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
 EMAIL B21 16/07/2021 06.08.2021

1 Burman Apartments 20A Crimscott Street London Southwark SE1 5TF Initial
 Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
 EMAIL B21 16/07/2021 06.08.2021

70 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Unit 7C Rich Industrial Estate Crimscott Street London Southwark SE1 5TE
 Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

Flat 15 Arundel Buildings Webb Street London Southwark SE1 4AS Initial
 Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
 EMAIL B21 16/07/2021 06.08.2021

9 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Gate House 40 Crimscott Street London Southwark SE1 5TE Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Unit 2 Fifth Floor Rich Industrial Estate Crimscott Street London Southwark
 Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

Unit 2 Second Floor Rich Industrial Estate Crimscott Street London Southwar
 Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

Studio 25 41A Crimscott Street London Southwark SE1 5TE Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Studio 16 41A Crimscott Street London Southwark SE1 5TE Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 33 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 58 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

81 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

44 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

25 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

22 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

10 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

69 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

54 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

28 Pages Walk London Southwark SE1 4HR Initial Notification B28
 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL B21
 16/07/2021 06.08.2021

Flat 8 Arundel Buildings Webb Street London Southwark SE1 4AS Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 21 Arundel Buildings Webb Street London Southwark SE1 4AS Initial
 Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
 EMAIL B21 16/07/2021 06.08.2021

Flat 14 Arundel Buildings Webb Street London Southwark SE1 4AS Initial
 Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
 EMAIL B21 16/07/2021 06.08.2021

77 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

67 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

53 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

20 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

14 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 54 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 36 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 34 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 14 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 4 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 2 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Studio 14 41A Crimscott Street London Southwark SE1 5TE Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Studio 2 41A Crimscott Street London Southwark SE1 5TE Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

7 Burman Apartments 20A Crimscott Street London Southwark SE1 5TF Initial
 Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
 EMAIL B21 16/07/2021 06.08.2021

6 Burman Apartments 20A Crimscott Street London Southwark SE1 5TF Initial
 Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
 EMAIL B21 16/07/2021 06.08.2021

Flat 30 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 27 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

7 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

33 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Unit 6 Fourth Floor Unit 7A Rich Industrial Estate Crimscott Street London
 Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

18 Crimscott Street London Southwark SE1 5TE Initial Notification B28
 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL B21
 16/07/2021 06.08.2021

Unit 7A First Floor Rich Industrial Estate Crimscott Street London Southwar
 Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

Flat 6 Arundel Buildings Webb Street London Southwark SE1 4AS Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 3 Arundel Buildings Webb Street London Southwark SE1 4AS Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 2 Arundel Buildings Webb Street London Southwark SE1 4AS Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

85 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

82 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

59 Page's Walk London SE1 4HD Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

80 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

76 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

65 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

37 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

2 Crimscott Street London Southwark SE1 5TE Initial Notification B28
 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL B21
 16/07/2021 06.08.2021

44 Willow Walk London Southwark SE1 5SF Initial Notification B28
 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL B21
 16/07/2021 06.08.2021

Flat 56 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 39 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 26 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 8 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Studio 21 41A Crimscott Street London Southwark SE1 5TE Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Studio 9 41A Crimscott Street London Southwark SE1 5TE Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 4 43 Grange Road London Southwark SE1 3BH Initial Notification B28
 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL B21
 16/07/2021 06.08.2021

Flat 67 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 23 Arundel Buildings Webb Street London Southwark SE1 4AS Initial
 Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
 EMAIL B21 16/07/2021 06.08.2021

Unit 5 The Willows 80 Willow Walk London Southwark SE1 5SY Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

4 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Studio 28 41A Crimscott Street London Southwark SE1 5TE Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 38 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 69 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

78 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Unit 3 The Willows 80 Willow Walk London Southwark SE1 5SY Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Unit 2 First Floor Rich Industrial Estate Crimscott Street London Southwark
 Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

Flat 7A Arundel Buildings Webb Street London Southwark SE1 4AS Initial
 Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
 EMAIL B21 16/07/2021 06.08.2021

79 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

32 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

11 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Unit 2 Third Floor Rich Industrial Estate Crimscott Street London Southwark
 Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

Flat 73 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 51 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 37 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 22 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

6 Rose Stapleton Terrace 16 Pages Walk London Southwark SE1 4SB Initial
 Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
 EMAIL B21 16/07/2021 06.08.2021

5 Burman Apartments 20A Crimscott Street London Southwark SE1 5TF Initial
 Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
 EMAIL B21 16/07/2021 06.08.2021

39 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

51 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Studio 20 41A Crimscott Street London Southwark SE1 5TE Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

19 Pages Walk London Southwark SE1 4SB Initial Notification B28
 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL B21
 16/07/2021 06.08.2021

58 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

24 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 23 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Living Accommodation Victoria 68-70 Pages Walk London Southwark SE1 4HL
 Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

Studio 19 41A Crimscott Street London Southwark SE1 5TE Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 49 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 44 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 24 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Studio 8 41A Crimscott Street London Southwark SE1 5TE Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Studio 3 41A Crimscott Street London Southwark SE1 5TE Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Unit 2 Fourth Floor Rich Industrial Estate Crimscott Street London Southwar
 Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

Units 9 And 10 Fourth Floor Rich Industrial Estate Crimscott Street London
 Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

78 Harold Estate, Pages Walk London SE1 4HW Recon.
Letter - Neigh BULK - NO EMAIL B21 16/07/2021 06.08.2021

Flat 5 Arundel Buildings Webb Street London Southwark SE1 4AS Initial Notification
B28 29/05/2020 26.06.2020 Recon. Letter - Neigh BULK - NO EMAIL
B21 16/07/2021 06.08.2021

Flat 17 Arundel Buildings Webb Street London Southwark SE1 4AS Initial
Notification B28 29/05/2020 26.06.2020 Recon. Letter - Neigh BULK - NO
EMAIL B21 16/07/2021 06.08.2021

48 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
B28 29/05/2020 26.06.2020 Recon. Letter - Neigh BULK - NO EMAIL
B21 16/07/2021 06.08.2021

43 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
B28 29/05/2020 26.06.2020 Recon. Letter - Neigh BULK - NO EMAIL
B21 16/07/2021 06.08.2021

23 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
B28 29/05/2020 26.06.2020 Recon. Letter - Neigh BULK - NO EMAIL
B21 16/07/2021 06.08.2021

21 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
B28 29/05/2020 26.06.2020 Recon. Letter - Neigh BULK - NO EMAIL
B21 16/07/2021 06.08.2021

Unit 7B Rich Industrial Estate Crimscott Street London Southwark SE1 5TE
Initial Notification B28 29/05/2020 26.06.2020 Recon. Letter - Neigh
BULK - NO EMAIL B21 16/07/2021 06.08.2021

Flat 42 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
B28 29/05/2020 26.06.2020 Recon. Letter - Neigh BULK - NO EMAIL
B21 16/07/2021 06.08.2021

Flat 18 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
B28 29/05/2020 26.06.2020 Recon. Letter - Neigh BULK - NO EMAIL
B21 16/07/2021 06.08.2021

Flat 11 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
B28 29/05/2020 26.06.2020 Recon. Letter - Neigh BULK - NO EMAIL
B21 16/07/2021 06.08.2021

Studio 4 41A Crimscott Street London Southwark SE1 5TE Initial Notification
B28 29/05/2020 26.06.2020 Recon. Letter - Neigh BULK - NO EMAIL
B21 16/07/2021 06.08.2021

Flat 5 43 Grange Road London Southwark SE1 3BH Initial Notification B28
 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL B21
 16/07/2021 06.08.2021

Flat 47 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

3 Rose Stapleton Terrace 16 Pages Walk London Southwark SE1 4SB Initial
 Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
 EMAIL B21 16/07/2021 06.08.2021

Unit 3 Fourth Floor Unit 7A Rich Industrial Estate Crimscott Street London
 Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

Studio 22 41A Crimscott Street London Southwark SE1 5TE Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 83 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 18 Arundel Buildings Webb Street London Southwark SE1 4AS Initial
 Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
 EMAIL B21 16/07/2021 06.08.2021

Flat 16 Arundel Buildings Webb Street London Southwark SE1 4AS Initial
 Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
 EMAIL B21 16/07/2021 06.08.2021

Flat 13 Arundel Buildings Webb Street London Southwark SE1 4AS Initial
 Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
 EMAIL B21 16/07/2021 06.08.2021

Flat 46 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 21 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 16 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

5 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

20-22 Pages Walk London Southwark SE1 4SB Initial Notification B28
 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL B21
 16/07/2021 06.08.2021

36 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

66 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Studio 6 41A Crimscott Street London Southwark SE1 5TE Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

4 Rose Stapleton Terrace 16 Pages Walk London Southwark SE1 4SB Initial
 Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
 EMAIL B21 16/07/2021 06.08.2021

Unit 1 The Willows 80 Willow Walk London Southwark SE1 5SY Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

15 Pages Walk London Southwark SE1 4SB Initial Notification B28
 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL B21
 16/07/2021 06.08.2021

Victoria 68-70 Pages Walk London Southwark SE1 4HL Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 19 Arundel Buildings Webb Street London Southwark SE1 4AS Initial
 Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
 EMAIL B21 16/07/2021 06.08.2021

17 Pages Walk London Southwark SE1 4SB Initial Notification B28
 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL B21
 16/07/2021 06.08.2021

86 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

61 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

55 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

31 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

26 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

12 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 68 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 59 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 50 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 25 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 20 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 17 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Studio 24 41A Crimscott Street London Southwark SE1 5TE Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

9 Rose Stapleton Terrace 16 Pages Walk London Southwark SE1 4SB Initial
Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
EMAIL B21 16/07/2021 06.08.2021

8 Rose Stapleton Terrace 16 Pages Walk London Southwark SE1 4SB Initial
Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
EMAIL B21 16/07/2021 06.08.2021

5 Rose Stapleton Terrace 16 Pages Walk London Southwark SE1 4SB Initial
Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
EMAIL B21 16/07/2021 06.08.2021

1 Rose Stapleton Terrace 16 Pages Walk London Southwark SE1 4SB Initial
Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
EMAIL B21 16/07/2021 06.08.2021

Unit 8 Rich Industrial Estate Crimscott Street London Southwark SE1 5TE
Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
BULK - NO EMAIL B21 16/07/2021 06.08.2021

Flat 8 43 Grange Road London Southwark SE1 3BH Initial Notification B28
29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL B21
16/07/2021 06.08.2021

Flat 3 43 Grange Road London Southwark SE1 3BH Initial Notification B28
29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL B21
16/07/2021 06.08.2021

London Square Site Canteen Crimscott Street London Southwark SE1 5TE
Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
BULK - NO EMAIL B21 16/07/2021 06.08.2021

Flat 22 Arundel Buildings Webb Street London Southwark SE1 4AS Initial
Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
EMAIL B21 16/07/2021 06.08.2021

7 Rose Stapleton Terrace 16 Pages Walk London Southwark SE1 4SB Initial
Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
EMAIL B21 16/07/2021 06.08.2021

12-14 Pages Walk London Southwark SE1 4SB Initial Notification B28
29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL B21
16/07/2021 06.08.2021

15 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
B21 16/07/2021 06.08.2021

Flat 7 43 Grange Road London Southwark SE1 3BH Initial Notification B28
 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL B21
 16/07/2021 06.08.2021

Flat 4 Arundel Buildings Webb Street London Southwark SE1 4AS Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 55 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Unit 4 Rich Industrial Estate Crimscott Street London Southwark SE1 5TE
 Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

47 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

28 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

19 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

63 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Ground Floor Rich Industrial Estate Crimscott Street London Southwark SE1 5
 Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

Units 9 And 10 Basement To Second Floors Rich Industrial Estate Crimscott S
 Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

26 Pages Walk London Southwark SE1 4HR Initial Notification B28
 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL B21
 16/07/2021 06.08.2021

Flat 11 Arundel Buildings Webb Street London Southwark SE1 4AS Initial
 Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
 EMAIL B21 16/07/2021 06.08.2021

Flat 1 Arundel Buildings Webb Street London Southwark SE1 4AS Initial Notification

B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL

B21 16/07/2021 06.08.2021

68 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification

B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL

B21 16/07/2021 06.08.2021

56 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification

B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL

B21 16/07/2021 06.08.2021

52 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification

B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL

B21 16/07/2021 06.08.2021

8 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification

B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL

B21 16/07/2021 06.08.2021

46 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification

B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL

B21 16/07/2021 06.08.2021

42 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification

B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL

B21 16/07/2021 06.08.2021

38 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification

B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL

B21 16/07/2021 06.08.2021

Flat 71 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification

B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL

B21 16/07/2021 06.08.2021

Flat 70 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification

B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL

B21 16/07/2021 06.08.2021

Flat 65 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification

B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL

B21 16/07/2021 06.08.2021

Flat 64 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification

B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL

B21 16/07/2021 06.08.2021

Flat 62 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 61 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 45 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 43 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 32 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 31 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 12 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 7 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Studio 26 41A Crimscott Street London Southwark SE1 5TE Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Studio 17 41A Crimscott Street London Southwark SE1 5TE Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Studio 7 41A Crimscott Street London Southwark SE1 5TE Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Studio 5 41A Crimscott Street London Southwark SE1 5TE Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

4 Burman Apartments 20A Crimscott Street London Southwark SE1 5TF Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Studio 15 41A Crimscott Street London Southwark SE1 5TE Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

24 Pages Walk London Southwark SE1 4HR Initial Notification B28
 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL B21
 16/07/2021 06.08.2021

88 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

57 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

41 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

74 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 57 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Studio 10 41A Crimscott Street London Southwark SE1 5TE Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Studio 13 41A Crimscott Street London Southwark SE1 5TE Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 19 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 13 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 66 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 63 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

84 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

75 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

30 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

16 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

13 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

60 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Studio 11 41A Crimscott Street London Southwark SE1 5TE Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Unit 8 Fourth Floor Unit 7A Rich Industrial Estate Crimscott Street London
 Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

Unit 7A Third Floor Rich Industrial Estate Crimscott Street London Southwar
 Initial Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

Flat 9 Arundel Buildings Webb Street London Southwark SE1 4AS Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 12 Arundel Buildings Webb Street London Southwark SE1 4AS Initial
 Notification B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO
 EMAIL B21 16/07/2021 06.08.2021

73 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

71 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

64 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

62 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

59 Harold Estate Pages Walk London Southwark SE1 4HW Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

50 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

49 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

45 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

40 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

3 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

29 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

27 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

2 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

17 Harold Estate Pages Walk London Southwark SE1 4HN Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 53 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 29 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 15 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 85 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Flat 84 Alwen Court 6 Pages Walk London Southwark SE1 4GU Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

Studio 27 41A Crimscott Street London Southwark SE1 5TE Initial Notification
 B28 29/05/2020 26.06.2020Recon. Letter - Neigh BULK - NO EMAIL
 B21 16/07/2021 06.08.2021

59 Pages Walk London SE1 4HD Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

85 pages walk london se1 4hd Recon. Letter - Neigh BULK -
 NO EMAIL B21 16/07/2021 06.08.2021

2 Rose Stapleton Terrace 16 Pages Walk London Southwark SE1 4SB Initial
 Notification B28 08/06/2020 06.07.2020Recon. Letter - Neigh BULK - NO
 EMAIL B21 16/07/2021 06.08.2021

21-25 Pages Walk London Southwark SE1 4SB Initial Notification B28
24/04/2020 22.05.2020Recon. Letter - Neigh BULK - NO EMAIL B21
16/07/2021 06.08.2021

20 Crimscott Street London Southwark SE1 5TF Initial Notification B28
24/04/2020 22.05.2020Recon. Letter - Neigh BULK - NO EMAIL B21
16/07/2021 06.08.2021

21 Crimscott Street London Southwark SE1 5TE Initial Notification B28
24/04/2020 22.05.2020Recon. Letter - Neigh BULK - NO EMAIL B21
16/07/2021 06.08.2021

Unit 37 22 Crimscott Street London Southwark SE1 5TE Initial Notification
B28 24/04/2020 22.05.2020Recon. Letter - Neigh BULK - NO EMAIL
B21 16/07/2021 06.08.2021

24 Crimscott Street London Southwark SE1 5TE Initial Notification B28
24/04/2020 22.05.2020Recon. Letter - Neigh BULK - NO EMAIL B21
16/07/2021 06.08.2021

23 Crimscott Street London Southwark SE1 5TE Initial Notification B28
24/04/2020 22.05.2020Recon. Letter - Neigh BULK - NO EMAIL B21
16/07/2021 06.08.2021

Page House 33 Pages Walk London Southwark SE1 4SF Initial Notification
B28 24/04/2020 22.05.2020Recon. Letter - Neigh BULK - NO EMAIL
B21 16/07/2021 06.08.2021

59 Pages Walk London Southwark SE1 4HD Recon. Letter -
Neigh BULK - NO EMAIL B21 16/07/2021 06.08.2021

89 Pages Walk London SE1 4HD Recon. Letter - Neigh
BULK - NO EMAIL B21 16/07/2021 06.08.2021

67 Pages Walk London SE1 4HD Recon. Letter - Neigh
BULK - NO EMAIL B21 16/07/2021 06.08.2021

15 Twist House 38 Grange Road London SE1 3FY Recon.
Letter - Neigh BULK - NO EMAIL B21 16/07/2021 06.08.2021

40 Gerda Road London SE9 3SN Recon. Letter - Neigh
BULK - NO EMAIL B21 16/07/2021 06.08.2021

78 Vauban Estate London SE163QY Recon. Letter - Neigh
BULK - NO EMAIL B21 16/07/2021 06.08.2021

130 Jamaica Rd London SE16 4RX

59 Pages Walk London se1 4hd

66 Setchell Way London SE15XS

20 Crimscott Street London SE5 5TF

57 Pages Walk London Southwark SE1 4HD

Recon. Letter - Neigh BULK - NO EMAIL B21 16/07/2021
06.08.2021

47 Pages Walk London SE1 4HD Recon. Letter - Neigh
BULK - NO EMAIL B21 16/07/2021 06.08.2021

1 Crimscott Street London SE1 5TE Recon. Letter - Neigh
BULK - NO EMAIL B21 16/07/2021 06.08.2021

18 quebec way London se16 7er Recon. Letter - Neigh BULK -
NO EMAIL B21 16/07/2021 06.08.2021

53 Harold Estate Pages Walk London SE1 4HW Recon.
Letter - Neigh BULK - NO EMAIL B21 16/07/2021 06.08.2021

117 Brandon Street London SE17 1AL Recon. Letter - Neigh
BULK - NO EMAIL B21 16/07/2021 06.08.2021

4 rose stapleton terrace 16 pages walk London SE1 4SB
Recon. Letter - Neigh BULK - NO EMAIL B21 16/07/2021
06.08.2021

Flat 4, 55 Tanner Street London SE1 3PN Recon. Letter -
Neigh BULK - NO EMAIL B21 16/07/2021 06.08.2021

1 Rose Stapleton Terrace 16 Pages Walk London SE1 4SB
Recon. Letter - Neigh BULK - NO EMAIL B21 16/07/2021
06.08.2021

85 pages walk london se1 4hd Recon. Letter - Neigh BULK -
NO EMAIL B21 16/07/2021 06.08.2021

6 Rose Stapleton Terrace 16 Pages Walk London SE1 4SB
Recon. Letter - Neigh BULK - NO EMAIL B21
16/07/2021 06.08.2021

89 Page's Walk London SE1 4HD Recon. Letter - Neigh
BULK - NO EMAIL B21 16/07/2021 06.08.2021

9 Rose Stapleton Terrace 16 Pages Walk London Se14SB
Recon. Letter - Neigh BULK - NO EMAIL B21 16/07/2021
06.08.2021

61 Pages Walk London SE1 5HD Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

Ladybird Films 33 pages walk London SE1 5TE Recon.
 Letter - Neigh BULK - NO EMAIL B21 16/07/2021 06.08.2021

47 Pages Walk London SE1 4HD Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

9 Rose Stapleton Terrace 16 Pages Walk London SE14SB
 Recon. Letter - Neigh BULK - NO EMAIL B21 16/07/2021
 06.08.2021

90 Hicks House Freaan Street Bermondsey, London SE16 4AS
 Recon. Letter - Neigh BULK - NO EMAIL B21 16/07/2021
 06.08.2021

101 Pages Walk London SE14HD Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

1 Rose Stapleton Terrace 16 Pages Walk London SE1 4SB
 Recon. Letter - Neigh BULK - NO EMAIL B21 16/07/2021
 06.08.2021

63 Pages Walk London Southwark SE1 4HD Recon. Letter -
 Neigh BULK - NO EMAIL B21 16/07/2021 06.08.2021

19 Potier Street London SE1 4UX Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

102 SWAN MEAD TOWERBRIDGE ROAD LONDON SE1 4SU
 Recon. Letter - Neigh BULK - NO EMAIL B21 16/07/2021
 06.08.2021

8 Grange Road London SE1 3BE Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

63 Pages Walk London Se14hd Recon. Letter - Neigh BULK -
 NO EMAIL B21 16/07/2021 06.08.2021

35 Harold Estate, Pages Walk London SE1 4HN Recon.
 Letter - Neigh BULK - NO EMAIL B21 16/07/2021 06.08.2021

68-70 Page's Walk London SE1 4HL Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

91 Pages Walk Southwark London SE1 4HD Recon. Letter -
 Neigh BULK - NO EMAIL B21 16/07/2021 06.08.2021

61 London SE1 4HD Recon. Letter - Neigh BULK - NO
EMAIL B21 16/07/2021 06.08.2021

36 Castle Road Cowes PO31 7QZ Recon. Letter - Neigh
BULK - NO EMAIL B21 16/07/2021 06.08.2021

76 Guinness Square Pages Walk LONDON SE1 4HP Recon.
Letter - Neigh BULK - NO EMAIL B21 16/07/2021 06.08.2021

proscreen production 24 Crimscott Street London SE1 5TE
Recon. Letter - Neigh BULK - NO EMAIL B21 16/07/2021
06.08.2021

2 Rose Stapleton Terrace Pages Walk London se14sb
Recon. Letter - Neigh BULK - NO EMAIL B21 16/07/2021
06.08.2021

6 Pages Walk London Se1 4GU Recon. Letter - Neigh BULK -
NO EMAIL B21 16/07/2021 06.08.2021

57 Pages Walk London SE1 4HD Recon. Letter - Neigh
BULK - NO EMAIL B21 16/07/2021 06.08.2021

Flat 4 1 Woods Place London SE1 3BS Recon. Letter - Neigh
BULK - NO EMAIL B21 16/07/2021 06.08.2021

51 Pages Walk London SE1 4HD Recon. Letter - Neigh
BULK - NO EMAIL B21 16/07/2021 06.08.2021

2 Rose Stapleton Terrace 16 Pages Walk London SE1 4SB
Recon. Letter - Neigh BULK - NO EMAIL B21 16/07/2021
06.08.2021

5 Rose Stapleton Terrace Pages walk London SE14SB
Recon. Letter - Neigh BULK - NO EMAIL B21 16/07/2021
06.08.2021

7 Rose Stapleton Terrace London SE1 4SB Recon. Letter -
Neigh BULK - NO EMAIL B21 16/07/2021 06.08.2021

5 Rose Stapleton Terrace 16 Pages Walk London SE1 4SB
Recon. Letter - Neigh BULK - NO EMAIL B21 16/07/2021
06.08.2021

61 pages walk London SE14HD Recon. Letter - Neigh BULK -
NO EMAIL B21 16/07/2021 06.08.2021

59 Page's Walk London SE1 4HD Recon. Letter - Neigh
BULK - NO EMAIL B21 16/07/2021 06.08.2021

6 Tanners yard 239 long lone London SE14PT Recon. Letter -
 Neigh BULK - NO EMAIL B21 16/07/2021 06.08.2021

5 Rose Stapleton Terrace 16 Pages Walk London SE1 4SB
 Recon. Letter - Neigh BULK - NO EMAIL B21 16/07/2021
 06.08.2021

Melville Property Group Ltd. 614 Kingston Road London SW20 8DN
 Recon. Letter - Neigh BULK - NO EMAIL B21 16/07/2021
 06.08.2021

19 Gratton Road Cheltenham GL50 2BT Recon. Letter -
 Neigh BULK - NO EMAIL B21 16/07/2021 06.08.2021

19 Potier Street London SE1 4UX Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

19 Potier Street London SE1 4UX Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

61 Pages Walk London Se1 4hd Recon. Letter - Neigh BULK -
 NO EMAIL B21 16/07/2021 06.08.2021

47 Pages Walk London SE1 4HD Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

6 Rose Stapleton Terrace 16 Pages Walk London SE1 4SB
 Recon. Letter - Neigh BULK - NO EMAIL B21 16/07/2021
 06.08.2021

6 Rose Stapleton Terrace 16 Pages Walk London SE1 4SB
 Recon. Letter - Neigh BULK - NO EMAIL B21 16/07/2021
 06.08.2021

19 Potier Street London SE1 4UX Recon. Letter - Neigh
 BULK - NO EMAIL B21 16/07/2021 06.08.2021

43 St. John?s estate London Se1 2xe

5 rose stapleton terrace 16 pages walk London SE1 4SB

Flat 7 Warlingham House Varcoe Road London SE16 3DQ

6 Rose Stapleton Terrace 16 Pages Walk London SE1 4SB

77 Pages Walk London SE1 4HD

Culloden Close London SE16 3JH

2 rose stapleton terrace 16 pages walk London Se14sb
12 Wordsworth Road London Southwark SE1 5TX
Flat 3 Peacock House 38 St Giles Road Camberwell SE5 7RG

78 Harold Estate, Pages Walk Harold Estate London SE1 4HW

57 Pages Walk London Southwark SE1 4HD
91 Pages Walk Southwark London SE1 4HD
5 rose Stapleton Terrace 16 pages walk London SE1 4SB
5 Rose Stapleton Terrace Pages Walk London SE14SB
56 Waleran Flats Old Kent Road London SE1 5UX
9 Rose Stapleton Terrace 16 Pages Walk London Se14sb
15 Alscot way London Se1 5xu
63 Pages Walk London SE1 4HD
Flat 17, Kite House, 286 Lynton Road Flat 17 London SE1 5ZS

119 Cronin Street London Se15 6jd
Flat 26 Corelli Court, 316 Lynton Road London SE1 5DD
32 Vauban Estate Bermondsey London SE16 3QU
47 Pages Walk London SE1 4HD SE1 7HA
57 Plough Way LONDON SE16 2LS
2 Tupman House London SE16 4UX
76 Guinness Square Pages Walk London SE14HP
9 Rose Stapleton Terrace 16 Pages Walk London Se14sb
85 pages walk london SE1 4HD
89 Pages Walk LONDON SE1 4HD
59 Page's Walk London SE1 4HD

CONSULTATION RESPONSES RECEIVED**Statutory and non-statutory organisations**

Environment Agency
Metropolitan Police Service (Designing Out Crime)
Thames Water

Neighbour and local groups

59 Page's Walk London SE1 4HD
78 Harold Estate, Pages Walk London SE1 4HW
85 pages walk London SE1 4hd
2 Rose Stapleton Terrace 16 Pages Walk London Southwark SE1 4SB
33 Pages Walk London SE1 4SF
89 Pages Walk London SE1 4HD
67 Pages Walk London SE1 4HD
15 Twist House 38 Grange Road London SE1 3FY
40 Gerda Road London SE9 3SN
78 Vauban Estate London SE163QY
130 Jamaica Rd London SE16 4RX
66 Setchell Way London SE15XS
20 Crimscott Street London SE5 5TF
57 Pages Walk London Southwark SE1 4HD
47 Pages Walk London SE1 4HD
1 Crimscott Street London SE1 5TE
18 Quebec way London se16 7er

53 Harold Estate Pages Walk London SE1 4HW
117 Brandon Street London SE17 1AL
4 Rose Stapleton terrace 16 pages walk London SE1 4SB

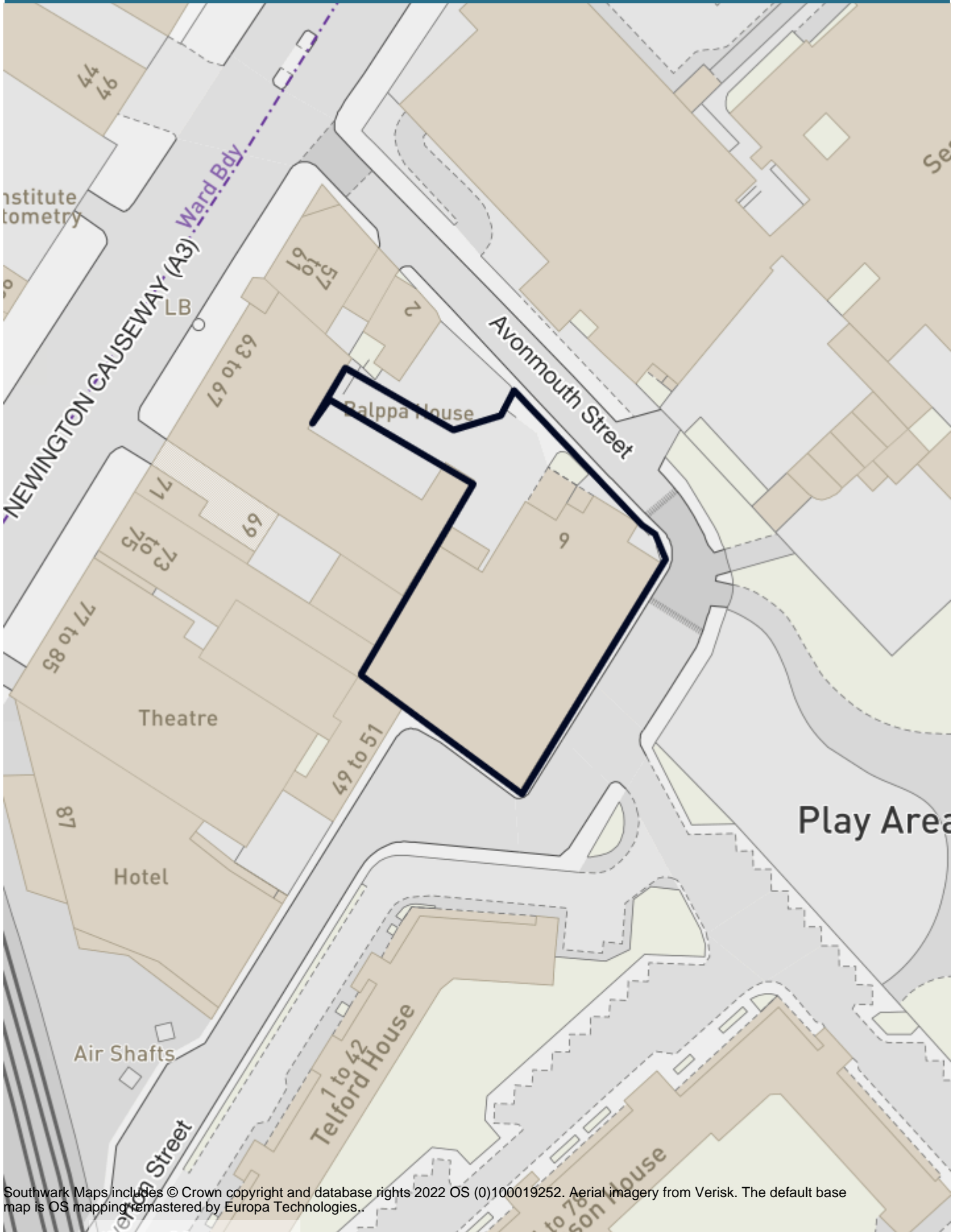
Flat 4, 55 Tanner Street London SE1 3PN
1 Rose Stapleton Terrace 16 Pages Walk London SE1 4SB
85 pages walk London se1 4hd
6 Rose Stapleton Terrace 16 Pages Walk London SE1 4SB
9 Rose Stapleton Terrace 16 Pages Walk London Se14SB
61 Pages Walk London SE1 5HD
90 Hicks House Freaton Street Bermondsey, London SE16 4AS
101 Pages Walk London SE14HD
19 Potier Street London SE1 4UX
102 SWAN MEAD TOWERBRIDGE ROAD LONDON SE1 4SU
8 Grange Road London SE1 3BE
35 Harold Estate, Pages Walk London SE1 4HN
68-70 Page's Walk London SE1 4HL
91 Pages Walk Southwark London SE1 4HD
61 London SE1 4HD
36 Castle Road Cowes PO31 7QZ
76 Guinness Square Pages Walk LONDON SE1 4HP
24 Crimscott Street London SE1 5TE
2 Rose Stapleton Terrace Pages Walk London se14sb
6 Pages Walk London Se1 4GU
Flat 4 1 Woods Place London SE1 3BS

51 Pages Walk London SE1 4HD
5 Rose Stapleton Terrace Pages walk London SE14SB
7 Rose Stapleton Terrace London SE1 4SB
5 Rose Stapleton Terrace 16 Pages Walk London SE1 4SB
61 pages walk London SE14HD
6 Tanners yard 239 long lone London SE14PT
Melville Property Group Ltd. 614 Kingston Road London SW20 8DN
19 Gratton Road Cheltenham GL50 2BT
19 Potier Street London SE1 4UX
19 Potier Street London SE1 4UX
61 Pages Walk London Se1 4hd
6 Rose Stapleton Terrace 16 Pages Walk London SE1 4SB
19 Potier Street London SE1 4UX
43 St. John's estate London Se1 2xe
Flat 7 Warlingham House Varcoe Road London SE16 3DQ
77 Pages Walk London SE1 4HD
Culloden Close London SE16 3JH
Flat 3 Peacock House 38 St Giles Road Camberwell SE5 7RG
56 Waleran Flats Old Kent Road London SE1 5UX
15 Alscot way London Se1 5xu
63 Pages Walk London SE1 4HD
Flat 17, Kite House, 286 Lynton Road Flat 17 London SE1 5ZS
119 Cronin Street London SE15 6JDd
Flat 26 Corelli Court, 316 Lynton Road London SE1 5DD
32 Vauban Estate Bermondsey London SE16 3QU

57 Plough Way LONDON SE16 2LS

2 Tupman House London SE16 4UX

76 Guinness Square Pages Walk London SE14HP



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Contents

RECOMMENDATION	2
BACKGROUND INFORMATION FOR THIS REPORT	2
THE APPLICATION	3
SITE LOCATION AND DESCRIPTION.....	4
SUMMARY OF THE PROPOSAL.....	6
PLANNING HISTORY OF THE SITE.....	11
PLANNING POLICY AND MATERIAL CONSIDERATIONS.....	12
ISSUES FOR CONSIDERATION	12
1) Summary of likely reasons for refusal in the Statement of Case	13
2) Summary of topics not raised as concerns within the Statement of Case	23
PLANNING OBLIGATIONS AND CONDITIONS	29
Comments from members of the public	30
Community impact and equalities assessment	31
Human rights implications.....	32
APPENDICES.....	33
AUDIT TRAIL.....	33

Item No. 7.2	Classification: Open	Date: 2 November 2022	Meeting Name: Planning Committee
Report title:	The council's Statement of Case for an appeal in relation to Avonmouth House, 6 Avonmouth Street, London, SE1 6NX (a 16 storey scheme, reference (21/AP/4297)		
Ward(s) or groups affected:	Chaucer		
From:	Director of Planning and Growth		

RECOMMENDATIONS

1. That Planning Committee:
 - 1) Note that the appeal for non-determination has been received in respect of planning application reference 18/AP/4039 and application for listed building consent reference 21/AP/4297, that this is a major application that would normally have been considered and determined by planning committee but will now be determined by the Secretary of State.
 - 2) Note that a planning inspector has been appointed to decide the appeal and that a planning inquiry has been listed with a time estimate of six days at present, on 14 - 16 December and 19 - 21 December 2022. Further days have been reserved on 22 and 23 December 2022 (the Inspector will review whether all of these days are required following the consideration of this report by the planning committee).
 - 3) Consider and endorse the Statement of Case at Appendix 1 which has been submitted to the planning inspectorate and includes the likely reasons for refusal of the application had they not been appealed for non-determination. These likely reasons for refusal relate to the following topics:
 - An unacceptable impact on townscape and local character and;
 - A lack of a S106 agreement to secure obligations to mitigate harm and secure planning benefits.
 - 4) That members note the significant concern expressed by the Health and Safety Executive about this development in relation to fire safety and agree non-compliance with D12 Fire Safety as an additional reason for refusal.

BACKGROUND INFORMATION

2. The purpose of this report is two-fold. Firstly to inform planning committee about the appeal for non-determination in respect of the application for planning

permission (reference 21/AP/4297) and secondly to request that planning committee consider and endorse the Statement of Case, at Appendix 1 to this report which, in accordance with the timetable for the appeals, has already been submitted to the Planning Inspectorate. The Planning Inspectorate has appointed an Inspector to consider the appeals on behalf of the Secretary of State.

3. As the application is now the subject of appeal, planning committee will no longer be able to decide the application in the usual way as the decision will be made by the Inspector. However, as it is the role of planning committee to consider major and strategic applications, this report seeks to provide further information about the application and the content of the Statement of Case, which forms the basis of the case which the council will present at the public inquiry.
4. An application for a second scheme on the same site but for a development of 14 storeys was submitted in May 2022 (reference 22/AP/2227) which is under consideration and officers are likely to recommend this application for approval soon.
5. The appellant, Tribe Avonmouth House Limited, submitted their appeal in on 15 July 2022, the Planning Inspectorate informed the council on 30 August that the inquiry procedure is to be followed and gave directions that the council's Statement of Case had to be submitted by 4 October 2022. The council is required to keep to the timetable and there are potential costs implications for failing to comply. Given the deadline for submission of the Statement of Case, there was not enough time to report to planning committee in advance of submission. The submitted Statement of Case contains the likely reasons for refusal had the council determined the applications, and therefore summarises the case that the council will present at the forthcoming inquiry. Whilst the Statement of Case has now been submitted in accordance with the procedural rules, the planning committee are asked to consider and endorse its contents. It is important to note that officers, following further analysis, consider that the reason for refusal relating to the impact on the listed court building should not be pursued. The initial Statement of Case included a putative reason for refusal regarding the impact on the listed court building however following this officers have further analysed this and concluded that there would not be a harmful impact so submitted an amended statement of case on 13 October which is the document appended to this report.

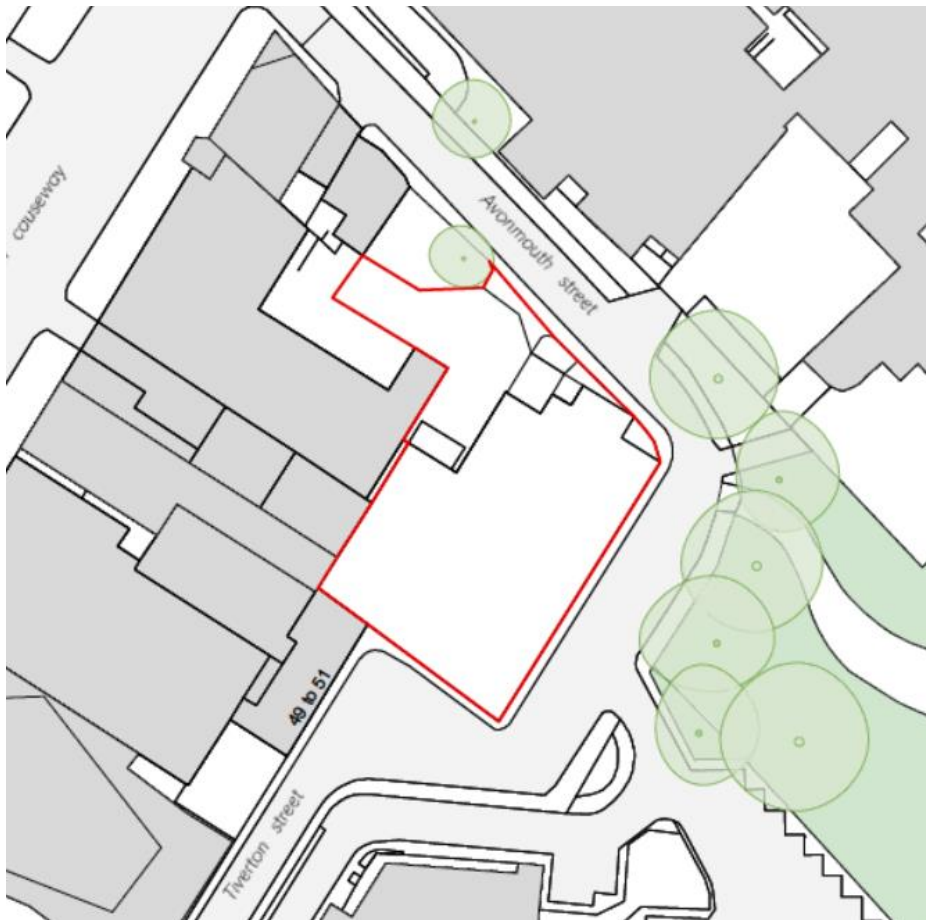
The application

6. This planning application was submitted in November 2021 and the description of development read:

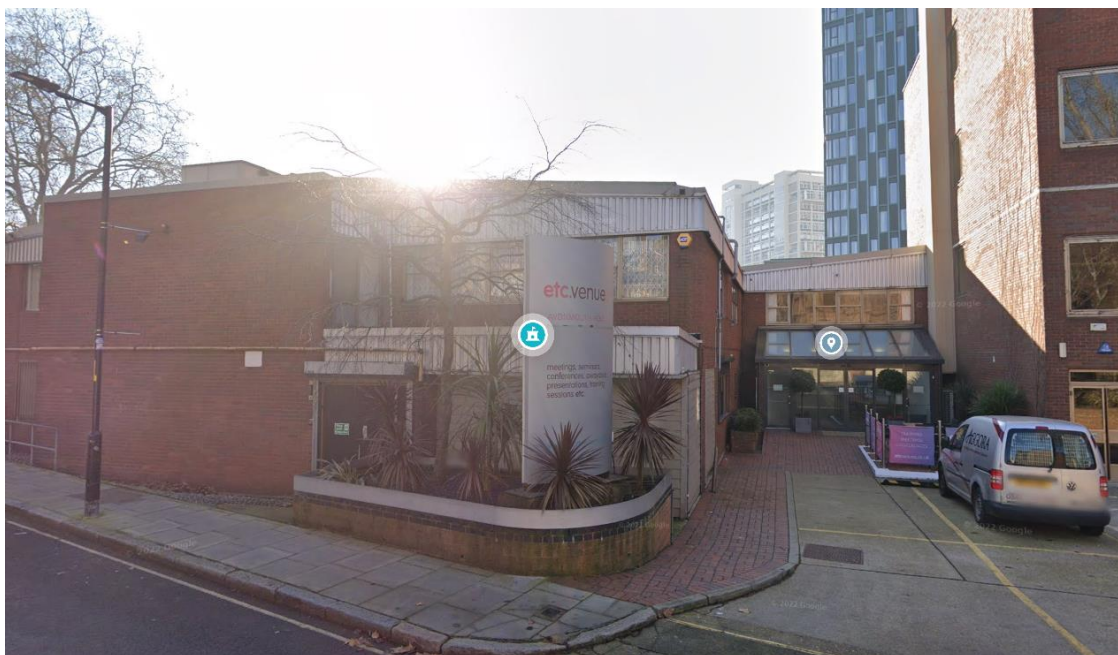
Demolition of existing building and structures and erection of a part 2, part 7, part 14, and part 16 storey plus basement development comprising 1,733sqm (GIA) of space for Class E employment use and/or community health hub and/or Class F1(a) education use and 233 purpose-built student residential rooms with associated amenity space and public realm works, car and cycle parking, and ancillary infrastructure.

Site location and description

7. The Site as existing comprises a building used as a training venue and ancillary service yard located to the south of Newington Causeway. Avonmouth Street runs south east from Newington Causeway before returning south west to wrap around the warehouse building on the site. The site is bounded by buildings fronting Newington Causeway to the north west, modern annexes to the Inner London Sessions Court located across Avonmouth Street to the north, Newington Gardens open space to the south east and Telford and Stephensons Houses, comprising 5 storey interwar council estate blocks to the south west. Beyond the site to the south west, Avonmouth Street becomes Tiverton Street, where a 24-storey hotel known as the Ceramic Building is located.



Existing site plan



Site looking southwest from Avonmouth Street

8. The Site is within the Central Activities Zone, the Elephant and Castle Opportunity Area, and the Elephant and Castle major town centre. It is also within North Southwark and Roman Roads Archaeological Priority Zone, flood zone 3 and the air quality management area.
9. The Site is not within a Conservation Area. It is not within the background assessment area London View Management Framework (“LVMF”) views or protected local borough views. There are no protected trees within the Site nor adjacent to it. The Inner London Sessions Court building located approximately 40m to the north east of the site is a Grade II listed building.
10. The Site has a PTAL of 6b due to its proximity to the Elephant and Castle rail and Underground stations and bus routes in the area. Access to the Site is from the northern portion of Avonmouth Street, where the shared service yard is located itself hosting the entrance to the warehouse building situated on the application Site
11. To the north of the Site are the rear of buildings fronting Newington Causeway. These comprise:
 - No. 2 Avonmouth Street, a four storey Victorian building in residential use with a rear elevation facing onto the site and service yard,
 - Balppa House, 57 – 61 Newington Causeway, a five storey mixed use building with ground floor retail and residential at floors 1 – 3
 - Coburg House, 63 – 86 Newington Causeway, a four storey office building with servicing access to the rear
 - No. 69 – 71 Newington Causeway, a four storey office building
 - No. 73 – 75 Newington Causeway, a four storey period property in office use and which is identified as an undesignated heritage asset
12. To the east but not immediately adjoining the site is a two storey building hosting

the Southwark Theatre, at 77 – 85 Newington Causeway. To the immediate east of this is a 24 storey mixed use building hosting hotel and residential use known as the Ceramic Building, addressed 87 Newington Causeway. Further south along Newington Causeway, the tallest building in the vicinity of the site comprises a 41 storey building located on Newington Causeway, addressed 251 Southwark Bridge Road.

13. Across Avonmouth Street to the north of the site are the modern annexes to the Inner London Sessions Court, beyond which is the Grade II listed court building. To the east and south east of the site is Newington Gardens, a local open space, identified as an undesignated heritage asset of approximately 1.2ha.
14. To the south and south west of the site are two five storey interwar council estate blocks: Telford House and Stephenson House, set in ancillary landscaped amenity areas. Both blocks are part of the wider Rockingham Estate located to the south and south west of the Site

Summary of the proposal

15. The application proposed the demolition of the existing buildings and the construction of a part two, seven and 14-storey building. A two-storey basement is also proposed, though the lower part would only cover part fo the site. The basements, ground and first floor would provide a mix of storage facilities (cycle and refuse), lobbies and a flexible non-residential space which the appellant would use as education/employment floorsapce or a health hub. The floors above are proposed as student accommodation with most of the accommodation- 217 rooms- being in the form of cluser flats. 16 studios are proposed with 12 of these being accessible units.



Proposed ground floor plan

16. Across the site, a total of 8789.45sqm GIA of floorspace is proposed, comprising 1733sqm employment/education/community health hub and 7056.45sqm residential student accommodation.
17. The development would be stepped from seven to 14 and then to 16 storeys as seen on Avonmouth Road in the image below. A lower two storey element would be on the northwest part of the site closest to the rear of the buildings on Newington Causeway.



Elevation on Avonmouth Street



Render of the development from Newington Causeway looking southeast



Render of the proposed development looking north along Tiverton Street

Public realm

18. A triangular pocket park would be provided on the southern part of the site functioning as an area of public realm while a communal amenity space would be provided on the roof of the seventh floor element for residents.



Landscaping plan



Render looking along Avonmouth Street showing the pocket park on the left

Servicing and parking

19. Deliveries and servicing by larger vehicles, including refuse vehicles, would take place on Avonmouth Street as is presently the case. Smaller vehicles such those used by couriers would service the building from within the site in the forecourt.
20. A total number of 210 cycle parking spaces are proposed with 176 long stay spaces, 24 long stay spaces within the site for resident students and users of the commercial space at ground floor. 10 visitor parking spaces are proposed within the public realm. The scheme would be car-free except for one blue badge car parking space in the fourcourt.

Planning history of the site

21. The relevant planning history of the site is in the table below.

Application reference	Description of Development	Date received	Decision
89/AP/0133	Change of use from office B1 to educational D1 at 6 Avonmouth Street SE1	10 January 1989	Granted
04/AP/1181	Retention of external refurbishment works to include new planters, resurface existing driveway, installation of new railings to semi-enclosed area and installation of a double set of doors to entrance	2 July 2004	Granted
04/AP/1607	Relocation of existing free standing advertisement sign, to be positioned within a proposed planter	1 September 2004	Granted

22. In addition to the subject appealed application, there is a live planning application at the site (ref: 22/AP/2227) with a statutory expiry date of 30 August 2022. The application is for:

“Demolition of existing building and structures and erection of a part 2, part 7, part 14 storey plus basement mixed-use development comprising 1733sqm (GIA) of space for class E employment use and/or class F1(a) education use and 219 purpose-built student residential rooms with associated amenity space, including at 7th floor roof level, and public realm works, car and cycle parking, and ancillary infrastructure..”

Planning policy and material considerations

23. 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.
24. The statutory development plans for the Borough comprise the London Plan (2021) and the Southwark Plan (2022). The National Planning Policy Framework (2021), SPDs, SPGs, draft LPGs and other planning documents constitute material considerations but are not part of the statutory development plan. A list of the relevant policies, guidance documents and other material considerations which are relevant to this application is provided within the Statement of Case at section 7.
25. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act (1990) requires decision-makers determining planning applications for development within conservation areas to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. Section 66 of the Act also requires the authority to pay special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest which they possess.
26. There are also specific statutory duties in respect of the Public Sector Equalities Duty which are referenced in the overall assessment at the end of the report.
27. The site is located within the:
 - Elephant and Castle Major Town Centre;
 - Strategic Cultural Area – Elephant and Castle Strategic Cultural Quarter;
 - Elephant and Castle Opportunity Area;
 - Central Activities Zone;
 - Archaeological Priority Area (North Southwark and Roman Roads);
 - Air Quality Management Area; and
 - Environment Agency Flood Zone 3 area
28. The site forms part of SPD 46- 63-85 Newington Causeway.

KEY ISSUES FOR CONSIDERATION

29. As a major redevelopment that includes a tall building, the submitted planning application has been assessed against many policies within the development plan, the NPPF, guidance and other material considerations. The proposal complies with some aspects of the development plan, but is contrary to others, namely the policies relating to the impact on townscape and fire safety in addition to that for planning obligations. The extent and significance of the conflict with policy forms part of the council's case for why planning permission should be refused.
30. This section of the report has two areas; firstly, the planning issues that form the council's likely reasons for refusal in its Statement of Case; secondly, a summary

of the topics that are not identified as likely reasons for refusal within the Statement of Case.

1) Summary of likely reasons for refusal in the Statement of Case

31. The council's case in response to the appeal focuses on two main issues that would have been likely reasons for refusal of the planning application:
- The proposed development would be contrary to policies P13 (Design of Places) and P17 (Tall Buildings) of the Southwark Plan 2022 because it fails to respond positively to the existing character and context and would as a result cause harm to the local townscape. Officers do not consider that the public benefits of the scheme in providing commercial space and residential student housing outweigh the harm.
 - The lack of a completed section 106 agreement or unilateral undertaking fails to secure planning obligations to mitigate adverse impacts and secure public benefits.

An issue that came to light following the submission of the statement of case was a significant concern raised by the HSE in relation to fire safety so officers are asking members to endorse a third reason for refusal:

- The proposed development would not achieve the highest standards of fire safety as required by policy D12 of the London Plan 2021 following the significant concern identified by the Health and Safety Executive.
32. The original statement of case submitted to the Planning Inspectorate for the council on 4 October included a reason for refusal on the harm to the listed court building. As mentioned above, officers have further analysed this point and withdrew this punitive reason for refusal, submitting an amended statement of case excluding this on 13 October.
33. The reason for refusal on townscape is set out in the Statement of Case, which is an appendix to this report, and is reproduced in the paragraphs below with additional with images and diagrams to illustrate the issues. Additional information is also provided on the matter of fire safety and the lack of a s106 agreement.

Impact on townscape and local character

34. Policy P13 ('Design of places') of the Southwark Plan (2022) requires the height, scale, massing and arrangement of development proposals to respond positively to the existing townscape, character and context.
35. Policy P17 ('tall buildings') additionally requires development proposals for tall buildings to respond positively to local character and townscape. The policy goes on to define tall buildings as those being either above 30m (or 25m where they are located within the Thames Special Policy Area) and also 'where they are

significantly higher than surrounding building or their emerging context.’ The policy has a number of other criteria which proposals for tall buildings are required to conform to, and the council requires these to have been adequately addressed

36. Policy P19 (‘Listed buildings and structures’) states that development which relates to listed buildings and their setting will only be permitted if it conserves or enhances a listed building’s special significance in terms of, among other things:
- Architectural style and features of a listed building
 - The contribution a development proposal makes to a listed building’s setting; and
 - Views which contribute positively to the significance of the building or its setting.
37. The planning application for the proposal was supported by a heritage and townscape visual impact assessment (HTVIA). This set out how the proposal would appear in key local views were it to be implemented. Several of the townscape views demonstrate the building to be tall enough, relative to the context of the site, to cause harm on the townscape and by extension local character of the immediate area. It is the council’s view that this is in part incurred as a result of the scale and overall 16 storey height of the proposed building, which is compounded by the proposed architectural approach to the crown of the building, with the top two storeys (floors 14 & 15) in a darker colour redbrick, contrasting strongly with the light-buff-brick-led façade of the remainder of the tower below, and which provides an impression of a top heavy, building within the streetscape. Consideration has been given to whether a change in material to match the rest of the building would reduce the impact to an acceptable level and it would not; the building would still appear incongruous within the townscape to an unacceptable degree
38. For the purposes of this Statement of Case and the council’s assessment of the impact of the proposal on the local townscape, the relevant views set out in the submitted HTVIA have been grouped into 3 types:
- Local townscape views from streets adjoining the Site and local estate roads which adjoin them
 - Views from within and across the Newington Gardens open space
 - Views from within the wider townscape, including those featuring the Grade II listed Inner London Sessions Court building
39. The views of each group tested and set out in the HTVIA and are listed below:

40. Local townscape views:



View 1 (Tiverton Street)



View 2 (Stephenson House to the East of the Railway Viaduct)



View 3 (Stephenson House to the South Corner of the Quadrangle)

41. Views across Newington Gardens



View 4 ('Stephenson House, to the West of Newington Gardens')



View 5 ('Newington Gardens, South Corner')



View 6 ('Newington Gardens, South East Side')

42. Views of the wider townscape



View 8 ('Harper Road, at Swan Street')



View 9 ('Harper Road, Opposite Inner London Crown Court Car Park')



View 11 ('Newington Causeway near the Junction with Avonmouth Street')

43. The primary elements of the local townscape which the proposed building is required to positively respond to include:

- the five-storey, red brick interwar council estate housing blocks of Telford and Stephenson Houses

- The Grade II listed Inner London Sessions Court
 - the four-storey contemporary, blue-rendered four-storey mixed use block of Balppa House located on the corner of Newington Causeway and Avonmouth Street
 - the landscape and greenery afforded by Newington Gardens
44. In addition to buildings located in wider views, including the 24-storey 'Ceramic Building', addressed 87 Newington Causeway, located to the south-west of the Site, opposite Telford House and which has a four-storey podium level fronting the streetscape, in addition to the 41 storey 251 Southwark Bridge Road, located on the opposite side of Newington Causeway and railway viaducts that bisect that section of the road
45. Views 1 – 3, 8 – 9 and 11 demonstrate that the proposed building is of a height that is out of character with the existing townscape in the immediate and wider vicinity of the Site. This is as a primarily as a consequence of the proposed height of the building at 16 storeys. It is acknowledged that the surrounding townscape character is mixed in terms of building scale and architectural design, and that this site is potentially suitable for a taller building as set out in the NSP site allocation NSP46. A building which was taller, but not as tall as the proposed, could potentially meet NSP policy requirements.
46. The proposed 16-storey building does not successfully respond to the existing townscape of taller buildings located towards the Elephant and Castle town centre, in including in the context of the views of the Inner London Sessions Court (Views 8 and 9), in which these existing taller buildings also appear. Due to the location of the site and its distance from the Elephant and Castle town centre, the 16 storey building's scale is read within the townscape of being the same height as that of the 24 storey Ceramic building located to the south west of the Site
47. Within these townscape views, the proposal would be contrary to the council's otherwise consistent approach of steering development of taller buildings (both approved and anticipated to come forward) towards locations where the imposing impact of the taller height on the townscape is justified, such as at the convergence of key routes or focuses of activity. The results of this strategy are demonstrated clearly in Views 8 and 9, where 251 Southwark Bridge Road is remains as the tallest building while being located closest to the Elephant and Castle town centre (and so furthest away from the Site), and which the Ceramic Building is appropriately subservient too. This progression of scale of buildings within the townscape would not be achieved with the 16-storey proposal within these views.
48. The proposal is considered to be excessively tall in relation to the five-storey housing blocks of the Rockingham Estate as demonstrated in Views 1 – 3 of the HTVIA. In Views 2 and 3 in particular, the proposal is considered to harm this part of the townscape due to
49. The tested views from and across Newington Gardens within the submitted HTVIA show the Gardens' trees with full foliage, obscuring the proposed building on the Site. The Council is of the view that the full impact of the proposal has not

therefore been readily available for assessment within the submission. It is likely that in the winter the lower floors of the building would remain partially obscured by branches of the trees which are relatively dense, while the upper storeys of the building's 16 storey height would be more visible.

Conclusion on the proposal's conformity with Policy P13 ('Design of places'), P17 ('Tall buildings') and P19 ('Listed buildings and structures')

50. The above analyses set out how the proposal does not respond positively to the existing townscape, character and context of the Site and is on this basis contrary to policies P13, P17 and P19 of the Southwark Plan (2022). This is with particular regards to the substantially lower scale buildings of the proposal's immediate context, the views from and across Newington Gardens and those from the wider vicinity, including within the context of the Grade II listed Inner London Sessions Court building and the context of the Council's consistent approach to the emerging character of the Elephant and Castle town centre in terms of tall buildings.
51. The council's evidence will explain that as a result of the factors summarised above the proposed development is contrary to national planning policy in section 12 of the NPPF and to the following development plan policies:
 - London Plan (2021) policies D3 "Optimising site capacity through the design-led approach", D9 "Tall buildings", HC1 "Heritage conservation and growth" and HC3 "Strategic and local views",
 - Southwark Plan (2022) policies P13 "Design of places", P14 "Design quality", P17 "Tall buildings" and P19 "Listed buildings and structures"

Lack of legal agreement

52. In the absence of a completed section 106 agreement or unilateral undertaking, the Planning Application Proposal fails to secure appropriate planning obligations to mitigate its adverse impacts and to secure the public benefits of the proposal to ensure compliance with planning policies for these topics. Planning obligations are necessary in relation to:
 - Provision of a nominations agreement as set out and required by policy P5 of the Southwark Plan
 - provision of the on-site affordable workspace at discount rent, with the associated fit out, marketing and management in order to comply with policy P31 "Affordable workspace" of the Southwark Plan and E3 "Affordable workspace" of the London Plan;
 - provision of the public realm within the site and public access to it;
 - transport mitigation (highway works and financial contributions for improvements to Avonmouth Street and Tiverton Street, bus service improvement contribution, Legible London contribution, cycle docking

station improvement contribution, provision of the Underground station entrance, servicing and deliveries management with the associated deposit and monitoring fee, and a travel plan including cycle hire access) to comply with Southwark Plan policies P49, P50, P51 and P53, and London Plan transport chapter policies;

- construction phase employment and training to comply with London Plan policy E11 “Skills and opportunities for all” and Southwark Plan policy P28 “Access to employment and training”;
 - operational phase employment and training to comply with London Plan policy E11 and Southwark Plan policy P28;
 - local procurement during construction and operational phase to comply with Southwark Plan policy P28;
 - carbon offset payment to comply with policy SI2 “Minimising greenhouse gas emissions” of the London Plan and P70 “Energy” of the Southwark Plan;
 - archaeological monitoring contribution to comply with policy P23 “Archaeology” of the Southwark Plan;
 - wind assessment post-construction to ensure sufficient mitigation to comply with policy P17 “Tall buildings” of the Southwark Plan and D9 “tall buildings” of the London Plan; and
53. In the absence of an appropriate signed agreement, the proposal is contrary to the development plan policies that relate to these topics, and to policy IP3 “Community infrastructure levy (CIL) and section 106 planning obligations” of the Southwark Plan (2022), policies T9 ‘Funding transport infrastructure through planning’ and DF1 “Delivery of the Plan and planning obligations” of the London Plan (2021) and the guidance within the “Section 106 Planning Obligations and Community Infrastructure Levy” SPD (2015 and its 2020 addendum).
54. It is anticipated that this issue will be resolved through discussions with the applicant on the heads of terms and draft planning agreement which are to progress ahead of the Inquiry. The appellant has indicated that they have had discussions with higher education institutes who would not be in a position to commit until planning consent had been given, To this end, the council is satisfied that this requirement could be met through an obligation in any legal agreement. Other mitigation would need to be secured by conditions imposed on any permission.

Impact on fire safety

55. The HSE was consulted and reviewed the application and supporting documents and in particular, the fire statement submitted. The statement says that the floors above the ground floor would be served by a single stair core that would be designed as a firefighting stair. This stair would continue to the two basement

levels connecting with ancillary areas. The HSE highlight in their comments (appendix 2) that the fire safety guidance and standard require that in single stair buildings, the stair should not continue to basements and this principle applies to firefighting lifts, the reason being there would be a risk of fire and smoke from the basement comprising the means of escape and fire service access.

56. Another significant area of concern is that a dry riser is proposed but for a building of over 50m a wet fire mains should be installed to allow adequate pressures to provide water supplies at each level immediately.
57. Concerns with the ground floor layout are the final exit for the escape route from the common stairs is next to the bin store that is contrary to the fire standard; the access for firefighters to the firefighting shaft would be via the concierge, which connects with ancillary accommodation.
58. Regarding the upper floors, the HSE say that the upper floors need of not provide an adequate firefighting lobby from the stair to the residential areas.
59. Finally, they say that there was not enough information provided to confirm if there are disabled refuges on the upper floors with consideration needed to the interaction between the refuges and the dry riser outlets.
60. The appellant is aware of these issues presented by the HSE and is working on amending drawings to address them. There is a possibility that these matters could be resolved by the time of the Inquiry though until that point, it is recommended that members endorse a putative reason for refusal relating to fire safety as below:

The development would not achieve the highest levels of fire safety contrary to policy D12 of the London Plan.

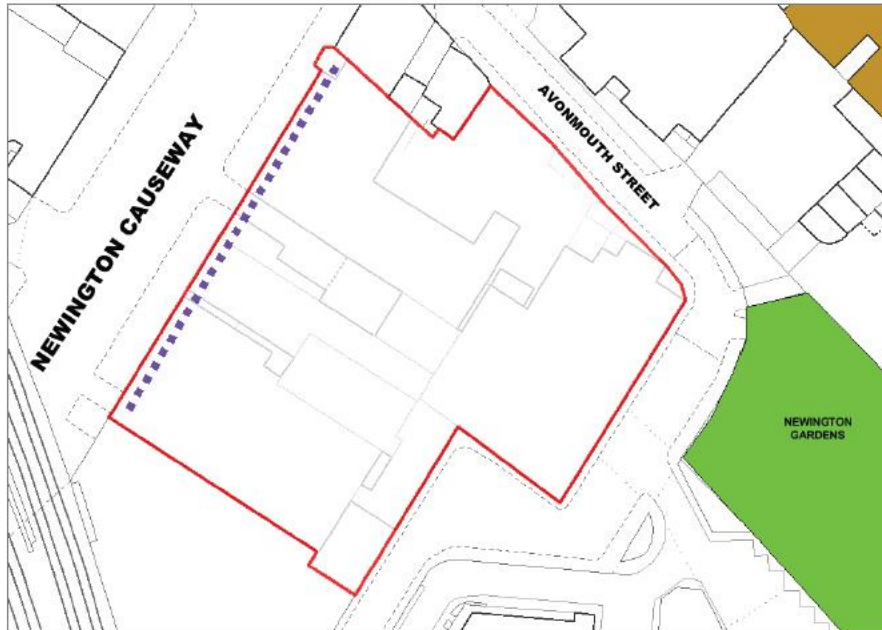
2) Summary of topics not raised as concerns within the Statement of Case

61. Other planning issues have been considered in respect of the applications but are not identified as likely reasons for refusal. These are summarised below.

Principle of the proposed land uses

62. The proposed uses are appropriate for the site's location. It is within the allocated site NSP 46:

NSP46: 63-85 Newington Causeway



- | | |
|----------------------------------|--|
| Site Boundary | Improved connectivity for pedestrians and cyclists |
| Conservation Area | Open Spaces |
| Grade I Listed Building | Buildings of architectural and historic merit |
| Grade II Listed Building | Buildings of townscape merit |
| Grade II* Listed Building | Locally Significant Industrial Sites |
| Opportunity for Active Frontages | Strategic Protected Industrial Land |
| Cycleways | New Public Open Space |

63. This appeal is for a proposal on the northern part of the site. The site allocation says detail is below.

Site Area	• 3,784m ²	
Existing uses (GEA)	<ul style="list-style-type: none"> • Southwark Playhouse (Sui Generis) – 816m² • Office (E)(g)(i)) – 4,168m² • Light industrial uses (B1c) – 827m² • Job Centre (E(c)(i)) – 546m² 	
Indicative residential capacity	• 93 homes	
Site requirements	<p>Redevelopment of the site must:</p> <ul style="list-style-type: none"> • Provide at least the amount of employment floorspace (E(g), B class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater; and • Retain the existing theatre use or provide an alternative cultural use (D2); and • Provide active frontages including ground floor retail, community or leisure uses (as defined in the glossary) on Newington Causeway. <p>Redevelopment of the site should:</p> <ul style="list-style-type: none"> • Provide new homes (C3). <p>Redevelopment of the site may:</p> <ul style="list-style-type: none"> • Provide a new community health hub (E(e)). <p>Planning application 12/AP/2694 is relevant to this site.</p>	
Design and accessibility guidance	<p>Redevelopment should deliver a more complementary and harmonious mix of uses alongside the retained Southwark Playhouse theatre that emphasises its cultural significance, attracts more visitors to the area and creates active frontages on Newington Causeway. Redevelopment should enhance accessibility to public transport, walking and cycle routes.</p> <p>Southwark needs to accommodate significant growth for offices and other workspaces which are growing in demand contributing to the central London economy and status as a world city. Sites that are within the Central Activities Zone are most in demand for delivery of offices and will be required to contribute to this growth by providing an increase in the amount of employment floorspace.</p>	
The site location		
	Approach to tall buildings	Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.
	Impacts Listed Buildings or undesignated heritage assets	The site is within the setting of Grade II listed building Inner London Sessions Court and the undesignated heritage asset Newington Gardens and undesignated heritage assets on Newington Causeway.
	Impacts a Conservation Area	The site is within the setting of the Trinity Church Square Conservation Area.

64. The development would provide residential floorspace but not self contained dwellings, the indicative number of 93 can be accommodated on the rest of the site. The present use of the site is educational, being a training venue, the proposed non-residential use is proposed to be a flexible use of this, employment (office) or a health hub. If an employment use is pursued, the appellant has agreed to provide at least 10% as affordable workspace. The principle of the land use is therefore acceptable and in compliance with the policy designation.

Affordable housing

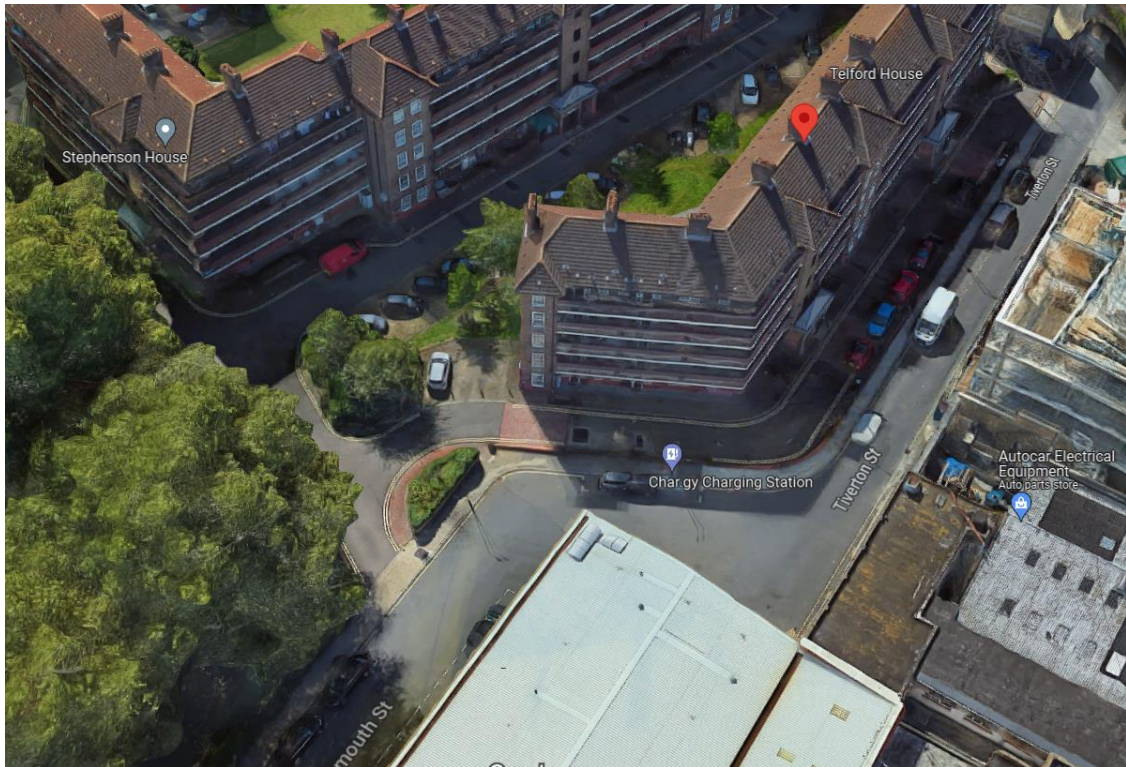
65. P5 of the Southwark Plan details the policy requirements for student homes and says:

Development of purpose-built student housing must:

- 1) Provide 5% of student rooms as easily adaptable for occupation by wheelchair users; and
 - 2) When providing direct lets at market rent, provide the maximum amount, with a minimum of 35% as conventional affordable housing by habitable room subject to viability, as per policy P4, as a first priority. In addition to this, 27% of student rooms must be let at a rent that is affordable to students as defined by the Mayor of London; or
 - 3) When providing all of the student rooms for nominated further and higher education institutions, provide the maximum amount of affordable student rooms with a minimum of 35% subject to viability. The affordable student rent should be set as defined by the Mayor of London.
66. The scheme would provide the requisite number of rooms as wheelchair accommodation with 12 units making up 5.5% of the overall number. The appellant has confirmed that they would secure a nominated education institution for the accommodation, which means the requirement is for a minimum of 35% of the accommodation to be affordable student rooms. Securing a nominated education provider is a requirement under criterion 3 of P5 for it to be applied; it would be secured in the legal agreement should be Inspector allow the appeal.

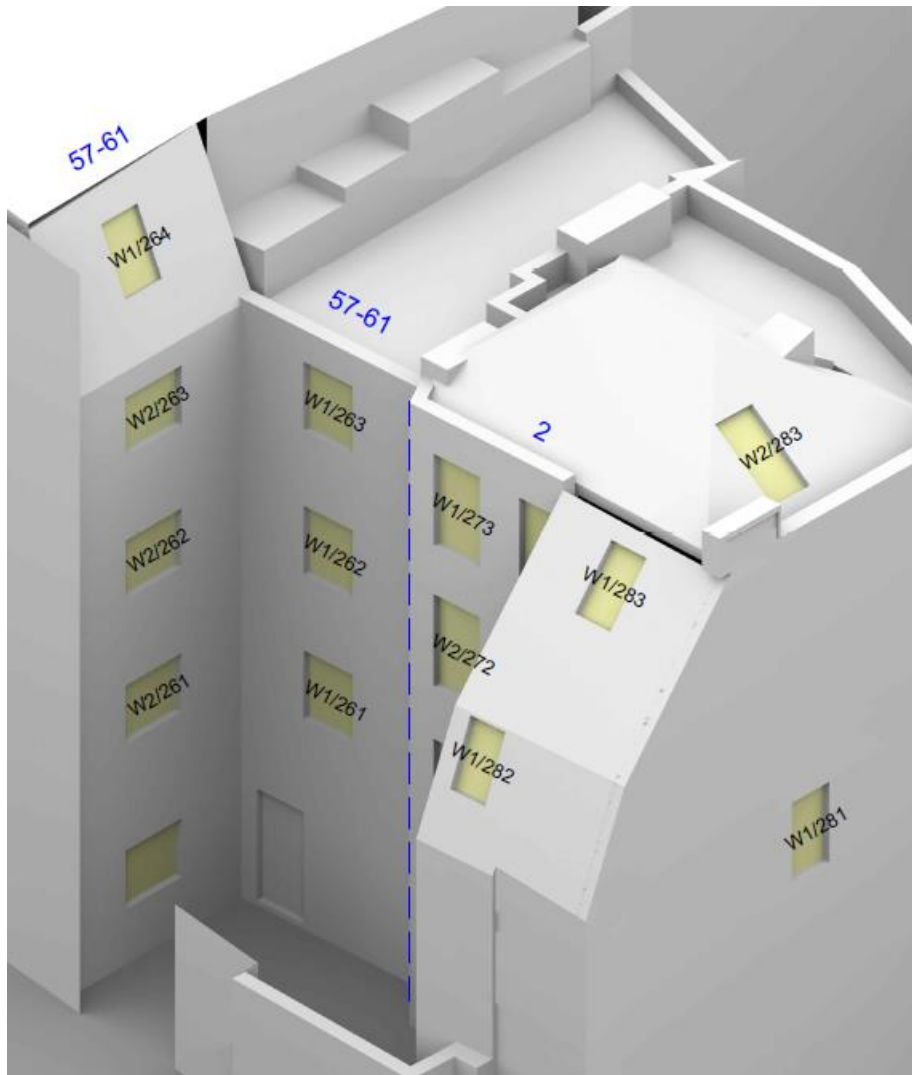
Daylight and sunlight

67. The applicant has undertaken a daylight and sunlight assessment. It looks at the impacts of overshadowing on Newington Gardens and the impact of daylight and sunlight for the following neighbouring properties:
- Telford House
 - Stephenson House
 - 57-61 Newington Causeway (Balppa House)
 - 2 Avonmouth Street
68. There would be noticeable reductions in daylight for windows of Telford House and Stephenson House facing the site. The rooms affected are bedrooms facing and bathrooms with the main living areas facing away from the site to the south. The access deck that means a small reduction in absolute daylight would have a proportionately larger impact affects daylight to these rooms.



Aerial photograph of Stephenson and Telford houses

69. While the assessment shows a reduction of more than 20% for a number of windows, the assessment without the impact of the decks show that the reduction would be less than 20% and in line with the BRE guidance for there to be no adverse impact except for two windows on Stephenson House where the retained VSC would be between 18-19%. There would be no impacts on sunlight as the site is to the north of these residential blocks. Impacts on 2 Avonmouth are mostly in line with the BRE guidance with some reductions above 20% but less than 30%. Impacts on 57-61 Newington Causeway windows facing the site are higher with a reduction of between 27% and 49% but the daylight here is already constrained with absolute e reductions of 4-8% resulting in high proportional reductions. The impacts on daylight and sunlight are considered, in these circumstances, to be acceptable.



Constrained windows at 57-61 Newington Causeway and 2 Avonmouth Street

Additional topics of assessment

70. The proposal would comply with policies in the development plan regarding the following topics if the necessary conditions and planning obligations were secured on any permission:
- Archaeology: subject to conditions and payment of a financial contribution (secured by a planning obligation) for the archaeologist's monitoring and advice during the pre-commencement and construction works.
 - Impact of the proposed development on the amenity of nearby residents from activity associated with the development would be limited as this would take place away from the quieter end of Avonmouth Street and Tiverton Street. Daylight and sunlight impacts are considered above.
 - Security and fire safety: subject to the Secured by Design condition, security details and fire statement being secured by conditions.
 - Impact of adjoining and nearby uses on occupiers and users of the proposed development.
 - Demolition and construction phase environmental impacts: would need to be mitigated by securing environmental management plans and logistics plans by conditions.

- Air quality: subject to dust mitigation measures during demolition and construction being secured as part of the demolition and construction management plan conditions.
- Transport matters (except for servicing): car parking, cycle parking (subject to conditions requiring further details of the locations and types of cycle parking for staff and visitors).
- Energy and sustainability: the sustainability of the proposal would need to be improved in terms of on-site carbon measures, payment of a carbon offset contribution and on-going “be seen” monitoring and reporting (secured by obligations), achieving BREEAM excellent to all buildings, providing whole life carbon and circular economy information (secured by conditions).
- Ecology and urban greening factor: subject to securing details of the planting, landscaping and bird boxes by conditions.
- Waste: subject to a delivery and servicing management plan by an obligation, and waste collection condition.
- TV, radio and telecoms networks: subject to securing a TV reception mitigation plan by condition.

Planning obligations and conditions

71. The assessment of the planning application has noted areas where planning obligations would be necessary in order to secure necessary mitigation to make the impacts of the proposal acceptable, to comply with planning policies, and to ensure the public benefits of the proposal would be provided. The absence of a completed section 106 agreement is set out in the Statement of Case as a likely reason for refusal of the planning application but is expected to be resolved through discussions with the appellant ahead of the inquiry.
72. Although the council’s case at the appeal is that the applications should be refused, a legal agreement will be drafted with the appellant as part of the appeal procedure, so that the matters summarised above would be secured if the Inspector is minded to approve the applications. The heads of terms are summarised below, and will need to be negotiated with the appellant.

The following planning obligations are suggested in order to make the development acceptable in planning terms:

1. Restriction on occupation of the student accommodation by students of a Higher Education Institution;
2. Not to occupy the student accommodation until a Nomination Agreement has been entered into with either London South Bank University, University of London, or another Higher Education Institution in respect of the student accommodation;
3. To provide 35% of the student accommodation as affordable student accommodation as defined through the London Plan;
4. Approval of a detailed Student Accommodation Management Plan (SAMP) prior to occupation and compliance with the SAMP for the duration that the development remains occupied;
5. To provide 5% of the student accommodation as wheelchair accessible;

6. To provide 10% of the 1,733sqm GIA non-purpose-built student accommodation floorspace as affordable workspace should it be implemented as E class floorspace;
 7. Payment of the carbon offset contribution prior to occupation;
 8. Provision of one disabled car parking space and an electric vehicle charging point as part of the disabled parking space;
 9. Restriction on car parking permits for occupants of the development;
 10. Payment of a cycle hire contribution to TfL (£120,000);
 11. Provision of public realm and highways improvements through a Section 38/278 Agreement;
 12. Approval of a Construction Skills and Employment Plan prior to implementation of the development;
 13. Approval of the Energy Strategy prior to occupation;
 14. To achieve the agreed carbon targets contained within the approved energy strategy;
 15. Approval of a Delivery and Service Management Plan prior to occupation;
 16. Approval of a Demolition Environmental Management Plan prior to any works of demolition;
 17. Approval of a Construction Environmental Management Plan prior to implementation; and
 18. Payment of an administration and monitoring fee.
73. Without a completed legal agreement in place (either a section 106 agreement or a unilateral undertaking), the necessary mitigation measures, and the elements of the scheme required to achieve policy compliance, would not be secured in the event that planning permission is granted. In the absence of a completed s106 agreement, the proposal is contrary to the development plan policies that relate to these topics, and to policy IP3 “Community infrastructure levy (CIL) and section 106 planning obligations” of the Southwark Plan (2022), policies T9 “Funding transport infrastructure through planning” and DF1 “Delivery of the Plan and planning obligations” of the London Plan (2021) and the guidance within the “Section 106 Planning Obligations and Community Infrastructure Levy” SPD (2015 and its 2020 addendum).
74. The conditions the council would like to be included on any planning permission were appended to the Statement of Common Ground (Appendix 3 of this report), in Appendix 2 of that document. These have been agreed with the appellant.

Comments from members of the public

75. Eight objections have been received from members of the public including residents. The topics raised are below, along with officer comments.

1) Impact on Newington gardens from overshadowing and ecology

Officer comment

The daylight and sunlight assessment shows that there would be no significant impact on the park from loss of light and would comply with the BRE guidance.

2) Disturbance from residents

Officer comments

The scheme has been designed with entrances away from residential areas. Residents would access the site along Avonmouth Street from Newington Causeway with little additional traffic to the more residential areas of Tiverton Street and the wider housing estate that includes Telford and Stephenson houses.

3) Impact of servicing**Officer comments**

This would be done from Avonmouth Street and be away from the residential estate and not differ significantly from the existing servicing.

4) Impact during construction**Officer comment**

The appellant has agreed to a condition to control and limit impacts of noise, dust, highway impacts and other disturbance during construction.

5) Impact on daylight**Officer comment**

There would be some significant impacts, the assessment is provided above.

6) Height, sense of enclosure**Officer comment**

The site is identified as being suitable for tall buildings in the site allocation. The proposed building would be part a townscape that already has tall buildings and there would be areas between them to reduce the sense of enclosure, along with the distance to neighbours.

Community impact and equalities assessment

76. 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.
77. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights.
78. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of considering this application.

Human rights implications

79. 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.
80. This application has the legitimate aim of redeveloping this site for a mixed use scheme and alterations to listed buildings on the site. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
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	Statement of Case
Appendix 2	Comments from the HSE on fire safety
Appendix 3	Statement of common ground

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth	
Report Author	Dipesh Patel, Group Manager	
Version	Final	
Dated	4 April 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
Director of Law and Governance	No	No
Date final report sent to Constitutional Team		24 October 2022

Statement of Case

The Town and Country Planning Appeals (Determination by Inspectors) (Inquiries Procedure) (England) Rules 2000/1625

**STATEMENT OF CASE
LONDON BOROUGH OF SOUTHWARK**

Date: 03 October 2022
Appeal Reference: APP/A5840/W/22/3303205
LPA Reference: 21/AP/4297
Appellant: Tribe Avonmouth House Limited
Site Address: Avonmouth House, 6 Avonmouth Street, London, SE1 6NX

Contents:

1. Introduction
2. Description of the Site and Area
3. Planning Application
4. Appeal
5. Planning History of the Site
6. Planning History of Nearby Sites
7. Planning Policies
8. Likely Reasons for Refusal of the Planning Proposal
9. Conditions

Appendices:

1. Documentary Evidence
2. List of Conditions Should Planning Permission be Granted

Copies:

Copies of this statement and the documents referred to are available on the council's online planning register (<https://planning.southwark.gov.uk/online-applications> using references APPEAL/22/0055 and 21/AP/4297), and for inspection Mondays to Fridays 9am to 5pm by prior arrangement at the Council's offices, 160 Tooley Street, London SE1P 5LX. Please contact Thomas Weaver (thomas.weaver@southwark.gov.uk 020 7525 3841) to arrange a time to view the appeal documents.

1. Introduction

- 1.1 This statement has been prepared by the London Borough of Southwark (“the Council”) in appeal reference APP/A5840/W/22/3303205. The appeals have been made by Tribe Limited (“the Appellant”), to the Secretary of State against the Council’s failure to determine the applications referred to in section 3 below.

2. Description of the Site and Area

- 2.1 The applications relate to a site known as Avonmouth House, 6 Avonmouth Street, London, SE1 6NX (“the Site”). The Site as existing comprises a warehouse building and ancillary service yard located to the south of Newington Causeway. Avonmouth Street runs south east from Newington Causeway before returning south west to wrap around the warehouse building on the site. The site is bounded by buildings fronting Newington Causeway to the north west, modern annexes to the Inner London Sessions Court located across Avonmouth Street to the north, Newington Gardens open space to the south east and Telford and Stephenson’s Houses, comprising 5 storey interwar council estate blocks to the south west. Beyond the site to the south west, Avonmouth Street becomes Tiverton Street, where a 24 storey hotel known as the Ceramic Building is located.
- 2.2 The Site has an area of 0.12 hectares and comprises a two storey warehouse hosting training and conference facilities. The site additionally includes the ancillary service yard which in addition to access to the warehouse building on the Site, provides servicing access for Coburg House (nos 63 – 67 Newington Causeway). Coburg House has a private right of way across this service yard.
- 2.3 The Site is within the Central Activities Zone, the Elephant and Castle Opportunity Area, and the Elephant and Castle major town centre. It is also within North Southwark and Roman Roads Archaeological Priority Zone, flood zone 3 and the air quality management area.

- 2.4 The Site is not within a Conservation Area. It is not within the background assessment area London View Management Framework (“LVMF”) views or protected local borough views. There are no protected trees within the Site nor adjacent to it. The Inner London Sessions Court building located approximately 40m to the north east of the site is a Grade II listed building.
- 2.5 The Site has a PTAL of 6b due to its proximity to the Elephant and Castle rail and Underground stations and bus routes in the area. Access to the Site is from the northern portion of Avonmouth Street, where the shared service yard is located itself hosting the entrance to the warehouse building situated on the application Site.
- 2.6 To the north of the Site are the rear of buildings fronting Newington Causeway. These comprise:
- No. 2 Avonmouth Street, a four storey Victorian building in residential use with a rear elevation facing onto the site and service yard,
 - Balppa House, 57 – 61 Newington Causeway, a five storey mixed use building with ground floor retail and residential at floors 1 – 3
 - Coburg House, 63 – 86 Newington Cause Way, a four storey office building with servicing access to the rear which forms part of the Site
 - No. 69 – 71 Newington Causeway, a four storey office building
 - No. 73 – 75 Newington Causeway, a four storey period property in office use and which is identified as an undesignated heritage asset
- 2.7 To the east but not immediately adjoining the site is a two storey building hosting the Southwark Theatre, at 77 – 85 Newington Causeway. To the immediate east of this is a 24 storey mixed use building hosting hotel and residential use known as the Ceramic Building, addressed 87 Newington Causeway. Further south along Newington Causeway, the tallest building in the vicinity of the site comprises a 41 storey building located on Newington Causeway, addressed 251 Southwark Bridge Road.

- 2.8 Across Avonmouth Street to the north of the site are the modern annexes to the Inner London Sessions Court, beyond which is the Grade II listed building referred to above. To the east and south east of the site is Newington Gardens, a local open space, identified as an undesignated heritage asset of approximately 1.2ha.
- 2.9 To the south and south west of the site are two five storey interwar council estate blocks known as Telford House and Stephenson House, set in ancillary landscaped amenity areas. Both blocks are part of the wider Rockingham Estate located to the south and south west of the Site.
- 2.10 The Council will seek to agree with the Appellant a description of the Site, the area within which it is situated and the Site's designations in the Statement of Common Ground. If it proves not possible to agree this information, further detail may be provided in the proofs of evidence of the Council's witnesses.

3. Planning Application

- 3.1 In June 2021 a formal request for pre-application advice was submitted (reference 21/EQ/0159) in relation to a scheme to redevelop the Site to provide a mixed use building comprising E class or F1(a) class floorspace at basement, ground and first floor levels with student accommodation across floors 2 – 16 above. The scheme was largely similar in land use and design terms, with the only key change between the pre-application scheme and the planning application being to the proposed total number of student bedspaces (from 223 to 233, respectively). A pre-application meeting was held with the Appellant on 17 August 2021 with the council raising concerns around land use, including re-provision of employment floorspace, and appropriateness of the location for a tall building.
- 3.2 In November 2021, the Appellant submitted an application for planning permission (for the "Planning Application Proposal"). The submitted proposals are similar to the pre-application version of the scheme to which the Council's

pre-application advice related. The application was given a planning application reference number by the Council with the following description:

Planning Application Proposal 21/AP/4297 - Demolition of existing building and structures and erection of a part 2, part 7, part 14, and part 16 storey plus basement development comprising 1,733sqm (GIA) of space for Class E employment use and/or community health hub and/or Class F1(a) education use and 233 purpose-built student residential rooms with associated amenity space and public realm works, car and cycle parking, and ancillary infrastructure

- 3.3 The Council consulted with the Greater London Authority (“GLA”), statutory bodies, internal specialists and local neighbours. A number of responses were received which the Council will refer to as part of its evidence before the Inquiry.
- 3.4 The Council’s likely reasons for refusal (set out below) take due account of the representations received in response to consultation.

4. Appeal

- 4.1 In June 2022, the Appellant made an appeal to the Secretary of State against the Council’s failure to determine the applications, and requested that this be heard by way of an inquiry. The Inspectorate reference is APP/A5840/W/22/3303205.
- 4.2 On 30 August 2022, the Planning Inspectorate wrote to the Council stating that the inquiry procedure is considered suitable to determine the appeals and setting out the timetable for the appeal process. The letter provided a deadline for submission of the Council’s statement of case of 4 October. At the time of writing this Statement of Case, the intention is to present a report to the planning committee on 2 November for authority to challenge the appeal and the likely grounds for refusal if the application had been determined.

5. Planning History of the Site

- 5.1 The earlier planning history of the site relates to a planning application for the refurbishment of the warehouse building on the site which is of limited relevance to the Appeal Scheme.
- 5.2 The Council will seek to agree with the Appellant a description of the planning history of the Site in the Statement of Common Ground. If it proves not possible to agree this information, this will be provided in the proof of evidence of the Council's witnesses.

6. Planning History of Nearby Sites

- 6.1 The Council's evidence will consider the planning history of nearby sites where relevant to the appeal.
- 6.2 The Council will seek to agree a list of any relevant nearby planning decisions and land uses with the Appellant in the Statement of Common Ground.

7. Planning Policies

- 7.1 The statutory development plan for the borough consists of the London Plan (2021) and the Southwark Plan (2022). The National Planning Policy Framework is a material consideration with significant weight.
- 7.2 The Southwark Plan (2022) was adopted on 23 February 2022 and replaces the Council's earlier Core Strategy (2011) and saved policies of the Southwark Plan (2007). The site is not within a site allocation identified as NSP46 in the Southwark Plan (2022) and is within the Elephant and Castle Area Vision.
- 7.3 The following is a list of the policies considered relevant to the Appeal. The policies which the Council considers relevant to the issues for which the likely reasons for refusal outline below relate to are highlighted in bold.
- 7.4 The relevant policies of the London Plan (2021) are:

- Policy GG4 – Delivering the homes Londoners need
- Policy SD5 - Offices, other strategic functions and residential development in the CAZ
- Policy D1 - London's form, character and capacity for growth
- Policy D3 - Optimising site capacity through the design-led approach
- Policy D4 - Delivering good design
- Policy D9 - Tall buildings
- Policy HC1 - Heritage conservation and growth
- Policy HC3 - Strategic and Local Views

7.5 The relevant policies of the Southwark Plan (2022) are:

- P13 Design of places
- P17 Tall buildings
- P19 Listed buildings and structures

7.6 The Supplementary Planning Documents (SPD) produced by the Council that are relevant to the appeal is:

- Heritage (2021);

7.7 The GLA's Supplementary Planning Guidance (SPGs) and London Plan Guidance (LPGs) that are relevant to the appeal include:

- Character and Context (June 2014)
- Optimising site capacity: A design-led approach LPG – consultation draft (February 2022)

7.8 The relevant sections of the National Planning Policy Framework (July 2021) are:

- Section 2: Achieving sustainable development
- Section 11: Making effective use of land
- Section 12: Achieving well designed places
- Section 16: Conserving and enhancing the historic environment.

- 7.9 The Council will seek to agree with the Appellant a list of policies, guidance and other documents relevant to the Site and the development in the Statement of Common Ground. To the extent that the relevance or otherwise of these matters is disputed, this will be addressed in the proofs of evidence of the Council's witnesses.
- 7.10 The Council may refer to other new or emerging policies, documents or guidance which raise relevant material considerations during the preparation of evidence or at the Inquiry.

8. Likely Reasons for Refusal of the Planning Application Proposal

- 8.1 Subject to planning committee members' determination, officers would have recommended to the planning committee to refuse planning permission for the reasons summarised below.

(1) Impact on townscape and local character

- 8.2 Policy P13 ('Design of places') of the Southwark Plan (2022) requires the height, scale, massing and arrangement of development proposals to respond positively to the existing townscape, character and context.
- 8.3 Policy P17 ('tall buildings') additionally requires development proposals for tall buildings to respond positively to local character and townscape. The policy goes on to define tall buildings as those being either above 30m (or 25m where they are located within the Thames Special Policy Area) and also 'where they are significantly higher than surrounding building or their emerging context.' The policy has a number of other criteria which proposals for tall buildings are required to conform to, and the council requires these to have been adequately addressed.
- 8.4 Policy P19 ('Listed buildings and structures') states that development which relates to listed buildings and their setting will only be permitted if it conserves

or enhances a listed building's special significance in terms of, among other things:

- 8.4.1 architectural style and features of a listed building
 - 8.4.2 the contribution a development proposal makes to a listed building's setting; and
 - 8.4.3 views which contribute positively to the significance of the building or its setting
- 8.5 The planning application for the proposal was supported by a heritage and townscape visual impact assessment (HTVIA). This set out how the proposal would appear in key local views were it to be implemented. Several of the townscape views demonstrate the building to be tall enough, relative to the context of the site, to cause harm on the townscape and by extension local character of the immediate area. It is the council's view that this is in part incurred as a result of the scale and overall 16 storey height of the proposed building, which is compounded by the proposed architectural approach to the crown of the building, with the top two storeys (floors 14 & 15) in a darker colour redbrick, contrasting strongly with the light-buff-brick-led façade of the remainder of the tower below, and which provides an impression of a top heavy, building within the streetscape. Consideration has been given to whether a change in material to match the rest of the building would reduce the impact to an acceptable level and it would not; the building would still appear incongruous within the townscape to an unacceptable degree.
- 8.6 For the purposes of this Statement of Case and the council's assessment of the impact of the proposal on the local townscape, the relevant views set out in the submitted HTVIA have been grouped into 3 types:
- 8.6.1 Local townscape views from streets adjoining the Site and local estate roads which adjoin them
 - 8.6.2 Views from within and across the Newington Gardens open space
 - 8.6.3 Views from within the wider townscape, including those featuring the Grade II listed Inner London Sessions Court building

8.7 The views of each group tested and set out in the HTVIA are:

Local townscape views

- 8.7.1 View 1 ('Tiverton Street')
- 8.7.2 View 2 ('Stephenson House to the East of the Railway Viaduct')
- 8.7.3 View 3 ('Stephenson House to the South Corner of the Quadrangle')

Views across Newington Gardens

- 8.7.4 'View 4' ('Stephenson House, to the West of Newington Gardens')
- 8.7.5 'View 5' ('Newington Gardens, South Corner')
- 8.7.6 'View 6' ('Newington Gardens, South East Side')

Views of the wider townscape

- 8.7.7 View 8 ('Harper Road, at Swan Street')
- 8.7.8 View 9 ('Harper Road, Opposite Inner London Crown Court Car Park')
- 8.7.9 'View 11' ('Newington Causeway near the Junction with Avonmouth Street')

8.8 The primary elements of the local townscape which the proposed building is required to positively respond to include:

- 8.8.1 the 5 storey, red brick interwar council estate housing blocks of Telford and Stephenson Houses
- 8.8.2 The Grade II listed Inner London Sessions Court
- 8.8.3 the 4 storey contemporary, blue-rendered 4 storey mixed use block of Balppa House located on the corner of Newington Causeway and Avonmouth Street
- 8.8.4 the landscape and greenery afforded by Newington Gardens
- 8.8.5 in addition to buildings located in wider views, including the 24 storey 'Ceramic Building', addressed 87 Newington Causeway, located to the south-west of the Site, opposite Telford House and which has a 4 storey podium level fronting the streetscape, in addition to the 41 storey 251 Southwark Bridge Road, located on the opposite side of Newington Causeway and railway viaducts that bisect that section of the road

- 8.9 The Council considers that Views 1 – 3, 8 – 9 and 11 demonstrate that the proposed building is of a height that is out of character with the existing townscape in the immediate and wider vicinity of the Site. This is as a consequence primarily of the proposed height of the building at 16 storeys. It is acknowledged that the surrounding townscape character is mixed in terms of building scale and architectural design, and that this site is potentially suitable for a taller building as set out in the NSP site allocation NSP46. A building which was taller, but not as tall as the proposed, could potentially meet NSP policy requirements.
- 8.10 The proposed 16 storey building does not successfully respond to the existing townscape of taller buildings located towards the Elephant and Castle town centre, in including in the context of the views of the Inner London Sessions Court (Views 8 and 9), in which these existing taller buildings also appear. Due to the location of the site and its distance from the Elephant and Castle town centre, the 16 storey building's scale is read within the townscape of being the same height as that of the 24 storey Ceramic building located to the south west of the Site.
- 8.11 Within these townscape views, the proposal would be contrary to the Council's otherwise consistent approach of steering development of taller buildings (both approved and anticipated to come forward) towards locations where the imposing impact of the taller height on the townscape is justified, such as at the convergence of key routes or focuses of activity. The results of this strategy are demonstrated clearly in Views 8 and 9, where 251 Southwark Bridge Road is remains as the tallest building while being located closest to the Elephant and Castle town centre (and so furthest away from the Site), and which the Ceramic Building is appropriately subservient too. This progression of scale of buildings within the townscape would not be achieved with the 16 storey proposal within these views.
- 8.12 The proposal is considered to be excessively tall in relation to the 5 storey housing blocks of the Rockingham Estate as demonstrated in Views 1 – 3 of the HTVIA. In Views 2 and 3 in particular, the proposal is considered to harm

this part of the townscape due to the degree of intrusion above these neighbouring building's roof ridge line of Telford (View 2) and Stephenson (View 3) Houses. The excessive degree of intrusion of the proposal is caused by reason of its scale and 16 storey height, in contrast to the equivalent views within the HTVIA as existing where there is no building visible.

8.13 The tested views from and across Newington Gardens within the submitted HTVIA show the Gardens' trees with full foliage, obscuring the proposed building on the Site. The Council is of the view that the full impact of the proposal has not therefore been readily available for assessment within the submission. It is likely that in the winter the lower floors of the building would remain partially obscured by branches of the trees which are relatively dense, while the upper storeys of the building's 16 storey height would be more visible.

8.14 The council considers the 16 storey proposal would harm 'townscape' views from Newington Gardens and the immediate surrounds. This is in virtue of its height and architectural treatment, where the proposal would have an overbearing presence in the townscape during the autumn, winter and spring months when foliage of the mature trees of the gardens will not obscure the building and the upper storeys in particular would be visible in these views. On this basis, the council does not consider the proposal has positively responded to the existing character and context of the site. The Council considers that with some reduction in height this could be successfully addressed.

Conclusion on the proposal's conformity with Policy P13 ('Design of places'), P17 ('Tall buildings') and P19 ('Listed buildings and structures')

8.15 The above analyses set out how the proposal does not respond positively to the existing townscape, character and context of the Site and is on this basis contrary to policies P13, P17 and P19 of the Southwark Plan (2022). This is with particular regards to the substantially lower scale buildings of the

proposal's immediate context, the views from and across Newington Gardens and those from the wider vicinity, including within the context of the Grade II listed Inner London Sessions Court building and the context of the Council's consistent approach to the emerging character of the Elephant and Castle town centre in terms of tall buildings.

8.16 The Council's evidence will explain that as a result of the factors summarised above the proposed development is contrary to national planning policy in section 12 of the NPPF and to the following development plan policies:

8.16.1 London Plan (2021) policies D3 "Optimising site capacity through the design-led approach", D9 "Tall buildings", HC1 "Heritage conservation and growth" and HC3 "Strategic and local views",

8.16.2 Southwark Plan (2022) policies P13 "Design of places", P14 "Design quality", P17 "Tall buildings" and P19 "Listed buildings and structures"

(2) Lack of a section 106 agreement

8.17 In the absence of a completed section 106 agreement or unilateral undertaking, the Planning Application Proposal fails to secure appropriate planning obligations to mitigate its adverse impacts and to secure the public benefits of the proposal to ensure compliance with planning policies for these topics. Planning obligations are necessary in relation to:

- Provision of a nominations agreement as set out and required by policy P5 of the Southwark Plan
- provision of the on-site affordable workspace at discount rent, with the associated fit out, marketing and management in order to comply with policy P31 "Affordable workspace" of the Southwark Plan and E3 "Affordable workspace" of the London Plan;
- provision of the public realm within the site and public access to it;
- transport mitigation (highway works and financial contributions for improvements to Avonmouth Street and Tiverton Street, bus service improvement contribution, Legible London contribution, cycle docking

station improvement contribution, provision of the Underground station entrance, servicing and deliveries management with the associated deposit and monitoring fee, and a travel plan including cycle hire access) to comply with Southwark Plan policies P49, P50, P51 and P53, and London Plan transport chapter policies;

- construction phase employment and training to comply with London Plan policy E11 “Skills and opportunities for all” and Southwark Plan policy P28 “Access to employment and training”;
- operational phase employment and training to comply with London Plan policy E11 and Southwark Plan policy P28;
- local procurement during construction and operational phase to comply with Southwark Plan policy P28;
- carbon offset payment to comply with policy SI2 “Minimising greenhouse gas emissions” of the London Plan and P70 “Energy” of the Southwark Plan;
- archaeological monitoring contribution to comply with policy P23 “Archaeology” of the Southwark Plan;
- wind assessment post-construction to ensure sufficient mitigation to comply with policy P17 “Tall buildings” of the Southwark Plan and D9 “tall buildings” of the London Plan; and

8.18 In the absence of an appropriate signed agreement, the proposal is contrary to the development plan policies that relate to these topics, and to policy IP3 “Community infrastructure levy (CIL) and section 106 planning obligations” of the Southwark Plan (2022), policies T9 ‘Funding transport infrastructure through planning’ and DF1 “Delivery of the Plan and planning obligations” of the London Plan (2021) and the guidance within the “Section 106 Planning Obligations and Community Infrastructure Levy” SPD (2015 and its 2020 addendum).

8.19 It is anticipated that this issue will be resolved through discussions with the applicant on the heads of terms and draft planning agreement which are to progress ahead of the Inquiry. The appellant has indicated that they have had

discussions with higher education institutes who would not be in a position to commit until planning consent had been given, To this end, the council is satisfied that this requirement could be met through an obligation in any legal agreement. Other mitigation would need to be secured by conditions imposed on any permission. The Council's list of suggested conditions is attached as Appendix 2 to this statement.

Conclusion

- 8.20 It will be the Council's case that the proposal is contrary to policy P13 ('Design of places'), P17 ('Tall buildings') and P19 ('Listed buildings and structures') of the Southwark Plan 2022. The proposal fails to respond positively to the existing character and context and would as a result harm the local townscape. The public benefits of the proposal would not outweighing the harm that would be caused to a designated heritage asset.
- 8.21 The Council's case will be that that the proposal conflicts with a range of key development plan policies relating to tall buildings, townscape, design, public realm and heritage. As such, it will be the Council's case that the proposed development is in conflict with the development plan when considered as a whole.
- 8.22 The Council's case will be that the other material considerations in this case do not indicate that it would be appropriate to grant planning permission notwithstanding the conflict with the development plan. On the contrary, when considered as a whole they clearly weigh in favour of refusal.
- 8.23 Accordingly, the Council's case will be that the appeal should be dismissed and planning permission refused.

Conditions

- 9.1 Should the Inspector be minded to grant planning permission, a list of suggested conditions is included in Appendix 1. These conditions would be in

addition to the heads of terms to be contained within a section 106 agreement, a draft of which will be provided to the Inspector in line with the timeframe.

Draft conditions

Appendix 1

List of Conditions Should Planning Permission be Granted

In the event the Inspector is minded to recommend the scheme for approval, the Council asks that the following conditions be included on the permission

1. The development to which this permission relates must have commenced not later than the expiration of three years beginning from the date of this decision notice.

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

2. The development hereby permitted shall be carried out in accordance with the approved plans listed in this notice, unless otherwise required by any other condition in this notice.

Reason: To ensure that the Development is undertaken in accordance with the approved drawings and documents to achieve compliance with Development Plan Policies (London Plan 2021 and Southwark Plan 2022), and National Planning Policy Framework 2021.

3. 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 inbound 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.

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 Southwark Plan Policies P50 (Highways impacts) and P56 (Protecting amenity), London Plan Policy T4 (Assessing and mitigating transport impacts), and the National Planning Policy Framework.

4. a.) No development shall take place until a remediation scheme has been submitted to and approved in writing by the Local Planning Authority. Following the completion of the works and measures identified in the approved remediation strategy, a verification report providing evidence that all works required by the remediation strategy have been completed, together with any future monitoring or maintenance requirements shall be submitted to and approved in writing by the Local Planning Authority.
- b.) 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.

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 Southwark Plan Policy P64 (Contaminated land and hazardous substances) and the National Planning Policy Framework.

5. No works (excluding demolition and site clearance) shall commence until full details of the proposed surface water drainage system incorporating the Sustainable Drainage Systems (SuDS) have been submitted to and approved in writing by the Local Planning Authority, including detailed design,

dimensions, depth and location of attenuation units and flow control devices. The specific SuDS type, arrangement and material should be given in line with the proposed strategy dependant on any necessary site investigations. The strategy should achieve a reduction in surface water runoff rates as detailed in the approved 'Flood Risk Assessment and Drainage Strategy' prepared by Ardent. The applicant must confirm that the site is safe in the event of blockage/failure of the system, including consideration of exceedance flows. The site drainage must be constructed to the approved details.

Reason: To minimise the potential for the site to contribute to surface water flooding in accordance with Southwark's Strategic Flood Risk Assessment (2017), Policy SI 13 of the London Plan, and Policy P68 of the Southwark Plan.

6. Before any work hereby authorised begins (excluding demolition to ground slab level), the applicant shall secure the implementation of a programme of archaeological evaluation works in accordance with a written scheme of investigation (WSI) which shall be submitted to and approved in writing by the Local Planning Authority. The WSI shall include the programme and methodology of site investigation and recording.

In the event archaeology of national importance is found on the site, a scheme shall be submitted to the council for approval to ensure this will be preserved in-situ. The scheme shall be implemented during the construction period and within the completed development as approved.

Reason: 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), policy HC1 Heritage conservation and growth of the London Plan (2021) and the National Planning Policy Framework (2021).

7. a) Prior to commencement of the development (excluding demolition and site investigation works) hereby permitted a Public Engagement Programme shall be submitted to and approved by the Local Planning Authority. The Public Engagement Programme shall set out:
- 1) How the archaeology fieldwork areas will be hoarded to provide opportunities for passers-by to safely view the excavations
 - 2) Drawings (artwork, design, text and materials, including their location and a full specification of the construction) for the public interpretation and presentation display celebrating the historic setting of the site, to be located on suitably visible public parts of the temporary site hoarding;
 - 3) Details of at least one event, such as a heritage trail, that will be held during the fieldwork phase (as a minimum this should state the date/time, duration, individuals involved and advance promotional measures for the event, and provide an outline of the content of the event).

- b) Prior to the commencement of the archaeology fieldwork, the hoarding shall be installed in full accordance with the approved details referred to in parts a.1 and a.2 of the condition, and the hoarding shall remain as such and in place throughout the archaeology fieldwork phase. During the archaeology fieldwork, the event (referred to in part a.3) shall be carried out.

Reason:

To promote the knowledge and understanding of the archaeological interest of the application site and provide information on the special archaeological and historical interest of this part of Southwark, in accordance with the National Planning Policy Framework (2021), policy HC1 Heritage conservation and growth of the London Plan (2021) and P23 Archaeology of the Southwark Plan (2022).

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

Reason: In order that the archaeological interest of the site is secured with regard to the details of the post-excavation works, publication and archiving to ensure the preservation of archaeological remains by record in accordance with Policy P23 (Archaeology) of the Southwark Plan, Policy HC1 (Heritage conservation and growth) of the London Plan, and the National Planning Policy Framework.

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

Reason: To minimise the risk to life and minimise building damage in the event of a fire, in accordance with the National Planning Policy Framework and Policy D12 (Fire safety) of the London Plan.

10. Prior to works commencing, including any demolition and no later than RIBA Stage 4, a Planning Stage Circular Economy Statement (CES) shall be submitted to and approved in writing by the Local Planning Authority. The CES shall include

- a Bill of Materials including kg/m² and recycled content (target for a minimum 20%) for the development;
- a Recycling and Waste Reporting table, evidencing that the proposal would reuse/recycle/recover 95% of construction and demolition waste, and put 95% of excavation waste to beneficial use;
- a Pre-demolition/Refurbishment Audit;
- a Letter of Commitment, pledging to submit a Post-Completion Report within 3 months of completion of the development;
- a Building End-of-Life Strategy;
- a Final Destination Facilities List; and
- evidence of any destination landfill sites' capacity to receive waste.

The development shall be implemented in accordance with the CES. Unless otherwise agreed by the Council, to comply with the Circular Economy Statement for the full life cycle of the Development.

Reason: To ensure that the proposal responds appropriately to climate change policies by reducing carbon emissions and minimising waste streams in accordance with London Plan Policies SI7 (Reducing waste and supporting the circular economy) and SI2 (Minimising greenhouse gas emissions), and Southwark Plan Policies P69 (Sustainability standards) and P70 (Energy).

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

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

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

Reason: To provide high quality digital connectivity infrastructure to contribute to London's global competitiveness in accordance with Policy SI6 of the London Plan.

13. Prior to the commencement of any above grade works (excluding demolition), details of bird and bat boxes shall be submitted to and approved in writing by the Local Planning Authority. The bird and bat boxes shall be installed with the development prior to the first occupation of the building of which they form a part or the first use of the space in which they are contained. The bird and bat boxes shall be installed strictly in accordance with the details so approved and shall be maintained as such thereafter.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with Southwark Plan Policy P60 (Biodiversity).

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

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

Reason: In order that the Local Planning Authority may be satisfied as to the quality of architectural design and details in accordance with Chapter 12 - Achieving well designed places of the NPPF, Policies D4 (Delivering good design) and D9 (Tall buildings) of the London Plan, and Policies P13 (Design of places), P14 (Design quality), and P17 (Tall buildings) of the Southwark Plan.

15. Prior to the commencement of any above grade works (excluding demolition), samples of all external facing materials and full-scale (1:1) mock-ups of the facades to be used in the carrying out of this permission shall be presented on site to the Local Planning Authority and approved in writing. The development shall not be carried out otherwise than in accordance with any such approval given. The facades to be mocked up should be agreed with the Local Planning Authority.

Reason: In order that the Local Planning Authority may be satisfied as to the quality of architectural design and details in accordance with Chapter 12 - Achieving well designed places of the NPPF, Policies D4 (Delivering good design) and D9 (Tall buildings) of the London Plan, and Policies P13 (Design of places), P14 (Design quality), and P17 (Tall buildings) of the Southwark Plan.

16. Prior to the commencement of any above grade works (excluding demolition), details of security measures shall be submitted and approved in writing by the Local Planning Authority and any such security measures shall be implemented prior to occupation in accordance with the approved details which shall achieve the 'Secured by Design' accreditation award from the Metropolitan Police.

Reason: In the interests of securing well designed, safe and secure buildings and neighbourhoods in accordance with Southwark Plan Policy P16 (Designing out crime).

17. Prior to the commencement of any above grade works (excluding demolition), details and 1:50 scale drawings of the secure cycle parking facilities to Southwark Plan 2022 standards shall be submitted for approval. This shall include 302 spaces, including 30 Sheffield racks providing for 60 spaces, including 3 disabled and 3 cargo bicycle spaces

Details relating to the servicing layout and its relationship with the public highway shall be submitted to be approved in writing by the Local Planning Authority. The cycle parking facilities shall be provided prior to the occupation of the development and thereafter shall be retained and the space used for no other purpose and the development shall not be carried out otherwise than in accordance with any such approval given.

Reason: In order to ensure that satisfactory safe and secure cycle parking and changing facilities are provided and can be easily accessed by users 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 London Plan Policy T5 (Cycling) and Southwark Plan Policy P53 (Cycling).

18. Prior to the commencement of any above grade works (excluding demolition), details of the biodiversity (green/brown) roof(s) shall be submitted to and approved in writing by the Local Planning Authority. The biodiversity (green) 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) roof shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair or escape in case of emergency. The biodiversity roof(s) shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter. Discharge of this condition will be granted on receiving the details of the green roof(s) and Southwark Council

agreeing the submitted plans. A post completion assessment will be required to confirm the roof has been constructed to the agreed specification.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with Policies SI 4 (Managing heat risk), SI 13 (Sustainable drainage), G1 (Green Infrastructure), and G5 (Urban Greening) of the London Plan and Policies P59 (Green infrastructure) and P60 (Biodiversity) of the Southwark Plan.

19. Prior to the commencement of any above grade works (excluding demolition), the applicant shall submit written confirmation from the appointed building control body that the specifications for each student bedspace identified in the detailed construction plans meet the standard of the Approved Document M of the Building Regulations (2015). The development shall be carried out in accordance with the details thereby approved by the appointed building control body.
- M4 (Category 3) 'wheelchair user dwellings':- at least 5%
 - M4 (Category 2) 'accessible and adaptable':- remaining units

Reason: In order to ensure the development complies with Policy P5 (Student homes) of the Southwark Plan and Policy D7 (Accessible Housing) of the London Plan.

20. Prior to the commencement of any above grade works (excluding demolition), full particulars of the sprinkler system to be used within the building 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 in accordance with Policy D12 (Fire Safety) of the London Plan.

21. Prior to the commencement of any landscaping works, detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings (including cross sections, surfacing materials of any access, terraces, or pathways layouts, materials and edge details), shall be submitted to and approved in writing by the Local Planning Authority. The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use. The planting, seeding and/or turfing shall be carried out in the first planting season following completion of building works and any trees or shrubs that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the same size and species in the first suitable

planting season. Planting shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction and BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf).

Reason: So that the Council may be satisfied with the details of the landscaping scheme, in accordance with Chapters 8, 12, 15 and 16 of the National Planning Policy Framework, Policies SI 4 (Managing heat risk), SI 13 (Sustainable drainage), G1 (Green Infrastructure), G5 (Urban Greening), G6 (Biodiversity and access to nature) and G7 (Trees and Woodlands) of the London Plan, and Policies P13 (Design of places), P14 (Design quality), P60 (Biodiversity) and P61 (Trees) of the Southwark Plan.

22. Prior to the commencement of any above grade works (excluding demolition), details shall be submitted to and approved in writing by the Local Planning Authority demonstrating that a minimum of at least two lifts (or more subject to capacity assessments) will be suitably sized fire evacuation lifts suitable to be used to evacuate people who require level access from the building. The development shall be carried out in accordance with these details and maintained as such in perpetuity.

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

23. Before the first occupation of the building hereby permitted, a revised sustainability strategy shall be submitted to and approved in writing by the Local Planning Authority detailing water efficiency measures to be implemented in the development.

Reason: In order to ensure that the proposed development complies with the requirements of Policy SI 5 of the London Plan.

24. Within three months of completion of the development or commencement of RIBA Stage 6 (whichever occurs earlier) and in any event prior to the building being occupied (or handed over to a new owner (if applicable)), to submit the Post-Construction Whole Life-Cycle Carbon (WLC) Assessment to the GLA. The WLC assessment shall be submitted to ZeroCarbonPlanning@london.gov.uk. The developer shall use the post construction tab of the GLA's WLC assessment template and the relevant forms must be completed accurately and in their 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 must be submitted

along with supporting evidence as required by the GLA's WLC assessment guidance and, unless otherwise agreed by the Council, within three months of the completion of the development or commencement of RIBA Stage 6 (whichever occurs earlier).

Reason: To ensure whole life-cycle carbon is calculated and reduced and to demonstrate compliance with Policy SI 2 (Minimising Greenhouse Gas Emissions) of the London Plan.

25. Before the first occupation of the building hereby permitted, details of the arrangements for the storing of domestic and commercial refuse shall be submitted to and approved in writing by the Local Planning Authority and the facilities approved shall be provided and made available for use by the occupiers. The facilities shall thereafter be retained and shall not be used or the space used for any other purpose.

Reason: To ensure that the refuse will be appropriately stored within the site thereby protecting the amenity of the site and the area in general from litter, odour, and potential vermin/pest nuisance in accordance with the National Planning Policy Framework 2021 and Policies P56 (Protection of amenity) and P62 (Reducing waste) of the Southwark Plan 2022.

26. Before the first occupation of the building hereby permitted, a landscape management plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas shall be submitted to and approved in writing by the Local Planning Authority. The landscape management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the Local Planning Authority.

Reason: This condition is necessary to ensure the protection of wildlife and supporting habitat and to secure opportunities for the enhancement of the nature conservation value of the site, in accordance with the NPPF, Policies G1 (Green infrastructure), G5 (Urban greening) and G6 (Biodiversity and access to nature) of the London Plan. It 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.

27. The student accommodation 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

Reason: To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with Southwark Plan Policy P56 (Protection of amenity) and the National Planning Policy Framework.

28. The Rated sound level from any plant, together with any associated ducting, shall not exceed the Background sound level (LA90 15min) at the nearest noise sensitive premises. Furthermore, the Specific plant sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific

Sound levels shall be calculated fully in accordance with the methodology of BS4142:2014+A1:2019.

Reason: To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with Southwark Plan policy P56 ('Protection of amenity') and the National Planning Policy Framework 2021.

29. Party walls, floors and ceilings between the commercial premises and student accommodation shall be designed to achieve a minimum weighted standardized level difference of 60 dB DnTw+Ctr. Pre-occupation testing of the separating partition shall be undertaken for airborne sound insulation in accordance with the methodology of ISO 16283-1:2014. Reason: To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with Southwark Plan policy P56 ('Protection of amenity') and the National Planning Policy Framework 2021.

30. Prior to the commencement of any use within use class E involving the cooking of food, full particulars and details of a scheme for the extraction and ventilation of the commercial kitchen shall be submitted to and approved by the Local Planning Authority. The scheme shall include:

- Details of extraction rate and efflux velocity of extracted air
- Full details of grease, particle and odour abatement plant
- The location and orientation of the extraction ductwork and discharge terminal
- A management servicing plan for maintenance of the extraction system to ensure that fumes and odours from the kitchen do not affect public health or residential amenity. Once approved the scheme shall be implemented in full and permanently maintained thereafter.

Reason: In order to ensure that any installed ventilation, ducting and ancillary equipment in the interests of amenity will not cause amenity impacts such as odour, fume or noise nuisance and will not detract from the

appearance of the building in accordance with The National Planning Policy Framework and Southwark Plan Policy P56 (Protection of amenity).

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

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. To ensure that the development does not harm groundwater resources in line with the National Planning Policy Framework paragraph 183 and Policy P64 (Contaminated land and hazardous substances) of the Southwark Plan.

32. Any deliveries, unloading and loading to the commercial units shall only be between the following hours:
08.00 to 20.00hrs on Monday to Saturdays; and
10.00 to 16.00hrs on Sundays and Bank Holidays.

Reason: To ensure that 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; Policy T7 (Deliveries, Servicing and Construction) of the London Plan 2021; and Policy P50 (Highways Impacts) of the Southwark Plan 2022.

33. The Class E/F1(a) floorspace shall not be used except during the hours of 07.00 - 23.00 on any day.

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; and Policy P50 (Highways Impacts) of the Southwark Plan.

34. No drainage systems for the infiltration of surface water drainage into the ground are permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

Reason: To ensure that the development does not contribute to and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with the National Planning Policy Framework paragraph 183 and Policy P64 (Contaminated land and hazardous substances) of the Southwark Plan.

35. The development hereby permitted shall be constructed to include the energy efficiency measures stated in the Energy Strategy prepared by JAW and submitted in support of the application. All measures and technologies shall remain for as long as the development is occupied, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure the development complies with the National Planning Policy Framework, Strategic Policy SP4 of the Southwark Plan, and Policy S1 2 (Minimising greenhouse gas emissions) of the London Plan.

36. The existing trees on or adjoining the site which are to be retained shall be protected and both the site and trees managed in accordance with the recommendations contained in the Arboricultural Method Statement. 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 Parts 8, 11, 12, 15 and 16, Policies G1 (Green Infrastructure), G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan, and Policy P61 (Trees) of the Southwark Plan.

Substantive response

Substantive response from the Health and Safety Executive (HSE) to the local planning authority (LPA) as a statutory consultee.

To LPA	LB Southwark
LPA planning ref no	21/AP/4297
Our ref	pgo-0793
Site address	Avonmouth House 6, Avonmouth Street, London, Southwark SE1 6NX
Proposal description	Demolition of existing building and structures and erection of a part 2, part 7, part 14, and part 16 storey plus basement development comprising 1,733sqm (GIA) of space for Class E employment use and/or community health hub and/or Class F1(a) education use and 233 purpose-built student residential rooms with associated amenity space and public realm works, car and cycle parking, and ancillary infrastructure.
Date on fire statement (Date the fire statement was completed)	27/10/2021
Date application received (Date HSE received notification from LPA)	18/01/2022
Date response sent (Date HSE sent substantive response to LPA)	07/02/2022

Headline response from HSE

Headline Response from HSE ('Advice to LPA' - Significant Concern)

1. Substantive response

Thank you for consulting HSE about this application.

◀ Nature of Response Advice provided to the planning authority Nature of Response ▶

Means of escape and fire service access

1.1 The fire statement (section 2) states that the above ground floors will be served by a single stair core, which will be designed as a firefighting stair. The plan drawings illustrate the

proposed stair continuing down to the basement level 2 and connecting with the ancillary areas. The fire safety guidance and standard require that, in single stair buildings, the stair should not continue down to the basement and the same applies to the firefighting lifts. This is due to the risk of smoke and heat from the basement compromising the means of escape and fire service access. Additionally, where a common stair forms part of the only escape route from a flat, it should not serve any ancillary accommodation. The proposed solution, illustrated on the ground floor plan, to separate the stairs at the ground level is acceptable only in small buildings, under 11 m height. Resolving this issue may affect land use planning considerations such as design and layout of the building.

- 1.2 The fire statement (section 6) states that the proposed building is over 50 m and that a dry fire main will serve the firefighting shaft (fire statement, section 10). Where there are floors higher than 50 m above firefighting access level, wet fire mains should be installed because of the pressures required to provide adequate water supplies at the landing valves at upper floors and to ensure that water is immediately available at all floor levels. The provision of a wet fire main will require water tanks and pumps which is likely to affect land use planning considerations such as design and layout of the building.
- 1.3 The ground floor plan illustrates the final exit for the escape route from the common stairs next to the bin store. The fire standard states that the access to refuse storage chambers should not be sited adjacent to escape routes or final exits. Further engineering analysis may be necessary to determine if a fire emanating from the bin store, could impede escape from the residential accommodation. Any consequent design changes may affect land use planning considerations such as design and appearance of the building.
- 1.4 The ground floor plan illustrates the access for firefighters to the firefighting shaft via the concierge which connects with ancillary accommodation. The entry to a firefighting shaft should be available either directly from the open air or by way of a protected corridor, which should not be used as a circulation space and should be separated from adjoining accommodation by lobbies. Resolving this issue may affect land use planning considerations such as design and layout of the building.
- 1.5 The upper floor plan drawings illustrate each floor having a flat with the exit door directly to the firefighting lobby. The access to the accommodation from the firefighting lift or stair should be through a firefighting lobby, as a single fire door cannot provide adequate protection to the firefighting stair and lift, from a fire in the accommodation. Resolving this issue may affect land use planning considerations such as design and layout of the building.

2. Supplementary information

The following points do not contribute to HSE's overall headline response and are intended only for guidance/clarification purposes. These comments identify items that may have implications for planning and could usefully be considered now.

- 2.1 It could not be confirmed from the information provided if there are disabled refuge points provided to the upper floor. Consideration should be given to the interaction between the disabled refuges and the dry riser outlets in the firefighting stair. The presence of charged fire hoses could hinder effective use of the disabled refuge; likewise, the use of a refuge could prevent access to the dry riser outlet. Ensuring the provision and location of disabled

refuges is suitable may affect land use planning considerations such as the layout of the building, and disabled persons' access.

Yours sincerely

07/02/2022



Fire Safety Information Assessor
Signed by: Ciprian.Burtila

This substantive response provides fire safety advice to the local planning authority. It's based on the information provided as it relates to land use planning.

It takes into account any fire safety information from section 9 of the fire statement form (where it relates to land use planning).

This response does not provide advice on any of the following:

- **matters that are or will be subject to Building Regulations regardless of whether such matters have been provided as part of the application**
- **matters related to planning applications around major hazard sites, licensed explosive sites and pipelines**
- **applications for hazardous substances consent**
- **London Plan policy compliance**

Statement of Common Ground

Avonmouth House

Appeal Draft Statement of Common Ground

1.0	Appeal reference	2
2.0	Site address and description	2
3.0	Description of development	4
4.0	Latest plans on which the Council has consulted	4
5.0	New plans not previously seen or consulted on by the LPA	4
6.0	Relevant planning history	4
7.0	List of important development plan policies	5
8.0	Other relevant planning policy/guidance/material considerations	7
9.0	Matters in dispute	8
	Appendix 1 – Core Documents List	11
	Appendix 2 – List of possible planning conditions	12
	Appendix 3 – List of possible s106 Heads of Terms	24

1.0 Appeal reference

1.1 APP/A5840/W/22/3303205

2.0 Site address and description

2.1 The appeal relates to the non-determination of a planning application by the London Borough of Southwark ("LB Southwark") (ref: 21/AP/4297) for the mixed-use redevelopment of Avonmouth House, 6 Avonmouth Street, London, SE1 6NX, on behalf of Tribe Avonmouth House Limited ("the Appellant").

The Site

2.2 The site is located within the Chaucer ward. The site is accessed from the southern and western side of Avonmouth Street, approximately 50 metres from the Newington Causeway (A3) junction. An extract from the Site Location Plan is provided below.



Figure 1: Site Location Plan

2.3 The site measures 0.12 hectare and comprises a two storey building constructed in the late 1980s and an area of hard surfaced vehicular access. It is currently occupied by etc. venues and comprises a mix of uses including corporate training and conference facilities, meeting rooms, lecture theatres, offices, and associated catering facilities.

2.4 The site is adjoined to the west by Coburg House (63-67 Newington Causeway), a seven storey commercial building fronting Newington Causeway; and Balppa House (57-61 Newington Causeway), a five storey mixed-use building on the corner of Newington Causeway and Avonmouth

Street. Coburg House has a private right of way on the existing northeast area of the site, which would remain post-development.

- 2.5 Adjoining the site to the north is a group of mainly 20th century, four storey commercial buildings with some residential above that front onto Newington Causeway. Included within this group is the three storey Southwark Playhouse (77-85 Newington Causeway) and the only surviving 19th century locally listed building at 73-75 Newington Causeway. Opposite to the east is Newington Gardens, a non-designated heritage asset. To the south of the site is the large Rockingham Estate formed of 19 predominantly five storey residential blocks set around quadrangles and areas of open amenity space.
- 2.6 There are no listed buildings on the site and the site is not located within a conservation area. Nearby heritage assets include the Grade II Listed Inner London Session Court, approximately 50m to the northeast of the site, and the Trinity Square Conservation Area, approximately 250m northeast of the site. The site is within the setting of non-designated heritage assets including the locally listed building at 73-75 Newington Causeway and Newington Gardens.
- 2.7 The site is well located for quick and convenient access to various modes of transport, including on foot, by bicycle and public transport. The site's public transport accessibility level (PTAL) is classified as "excellent" with a rating of 6b on a scale where 1a is poor and 6b is excellent. High frequency bus services are available from the bus stops located immediately adjacent to the Avonmouth Street/Newington Causeway junction. These stops are known as the Inner London Crown Court stops and are served by the 35, 133, 343 and C10 services as well as the N133 and N343 night bus services. Elephant and Castle Underground Station is located approximately 400 metres walk to the southwest of the site. It is located on the Bank branch of the northern line with a typical off-peak frequency of 20 trains per hour in each direction. It is also the terminus of the Bakerloo line with approximately 14 trains arriving and departing per hour. Elephant and Castle National Rail Station is located approximately 650 metres to the southwest of the site. It provides services to London Blackfriars, Kentish Town, St Albans City, Sevenoaks and Sutton amongst others.
- 2.8 There are a wide range of amenities within walking distance of the site and the two nearest university campuses, University of the Arts and London South Bank, are both within a 5 minute walk of the site.
- 2.9 The site is located in Flood Zone 3 within an area that benefits from flood defences.

Site Designations

- 2.10 The site has the following designations according to the Southwark Plan Planning Policy Interactive Map:
- Forms part of Site Allocation NSP46: 63 – 85 Newington Causeway;
 - Elephant and Castle Major Town Centre;
 - Strategic Cultural Area – Elephant and Castle Strategic Cultural Quarter;
 - Elephant and Castle Opportunity Area;
 - Central Activities Zone;
 - Archaeological Priority Area (North Southwark and Roman Roads);
 - Air Quality Management Area; and

- Environment Agency Flood Zone 3 area.

Surrounding Area

- 2.11 The area surrounding the site is mixed in character, comprising largely commercial, retail and leisure uses to the west and residential use to the south and east, which form the Rockingham Estate.
- 2.12 The site is within an area experiencing rapid regeneration and transformation in townscape terms, reflective of its opportunity area status. Within the immediate vicinity of the site, between Southwark Playhouse and the railway viaduct, is the recently constructed 24 storey mixed-use retail, hotel and residential scheme by SPPARC Architecture known as 'The Kite' (87 Newington Causeway). Further to the west of the railway viaduct is 'The Signal' building, a 22 storey apartment building at 89-93 Newington Causeway. Two Fifty One London (formerly Eileen House) stands at 41 storeys high and is located opposite 80-94 Newington Causeway.
- 2.13 Planning permission was granted in January 2020 for a 21 storey mixed commercial building at 5-9 Rockingham Street and 2-4 Tiverton Street and a further application is currently pending for a mixed-use 23 storey building including 259 student bedrooms (LPA ref: 22/AP/1068). Other sites within the immediate area that are identified for large scale future redevelopment in the Southwark Plan include the Salvation Army Headquarters and Skipton House, both on Newington Causeway to the southwest of the railway viaduct; and the Newington Triangle site bounded by Borough Road, Newington Causeway, and the railway viaduct. Formerly owned by Peabody Estate, Newington Triangle has been acquired by Berkeley Homes and currently houses the temporary food market, Mercato Metropolitan, although it is allocated for mixed-use development with an indicative capacity of 438 homes with the potential for tall buildings.

3.0 Description of development

- 3.1 The agreed description of development is:

“Demolition of existing building and structures and erection of a part 2, part 7, part 14, and part 16 storey plus basement development comprising 1,733sqm (GIA) of space for Class E employment use and/or community health hub and/or Class F1(a) education use and 233 purpose-built student residential rooms with associated amenity space and public realm works, car and cycle parking, and ancillary infrastructure.”

4.0 Latest plans on which the Council has consulted

- 4.1 Refer to Core Documents List at Appendix 1.

5.0 New plans not previously seen or consulted on by the LPA

- 5.1 Refer to Core Documents List at Appendix 1.
- 5.2 Following amendments to Condition 18 it has been agreed between the LPA and the appellant that amended plans will be submitted to show the policy compliant cycle parking provision.

6.0 Relevant planning history

- 6.1 The Council's online planning application database provides the following planning history for the site:

Application reference	Description of Development	Date received	Decision
89/AP/0133	Change of use from office B1 to educational D1 at 6 Avonmouth Street SE1	10 January 1989	Granted
04/AP/1181	Retention of external refurbishment works to include new planters, resurface existing driveway, installation of new railings to semi-enclosed area and installation of a double set of doors to entrance	2 July 2004	Granted
04/AP/1607	Relocation of existing free standing advertisement sign, to be positioned within a proposed planter	1 September 2004	Granted

6.2 In addition to the subject appealed application, there is a live planning application at the site (ref: 22/AP/2227) with a statutory expiry date of 30 August 2022. The application is for:

“Demolition of existing building and structures and erection of a part 2, part 7, part 14 storey plus basement mixed-use development comprising 1733sqm (GIA) of space for class E employment use and/or class F1(a) education use and 219 purpose-built student residential rooms with associated amenity space, including at 7th floor roof level, and public realm works, car and cycle parking, and ancillary infrastructure..”

7.0 List of important development plan policies

7.1 The development plan for LB Southwark comprises:

- The Southwark Plan (February 2022)
- The London Plan (March 2021)

7.2 Relevant policies within the Southwark Plan are as follows:

- Policy ST1 Southwark’s Development Targets
- Policy ST2 Southwark’s Places
- Policy SP1 Homes for all
- Policy SP4 A green and inclusive economy
- Policy SP6 Climate Emergency
- Policy AVP.09 Elephant and Castle Area Vision
- Policy P5 Student homes
- Policy P13 Design of places
- Policy P14 Design quality
- Policy P16 Designing out crime
- Policy P17 Tall buildings

- Policy P18 Efficient use of land
- Policy P20 Conservation areas
- Policy P21 Conservation of the historic environment and natural heritage
- Policy P22 Borough views
- Policy P23 Archaeology
- Policy P26 Local list
- Policy P27 Education places
- Policy P28 Access to employment and training
- Policy P30 Office and business development
- Policy P31 Affordable Workspace
- Policy P35 Town and local centres
- Policy P45 Healthy developments
- Policy P47 Community uses
- Policy P49 Public transport
- Policy P50 Highways impacts
- Policy P50 Walking
- Policy P53 Cycling
- Policy P55 Parking standards for disabled people and the physically impaired
- Policy P56 Protection of amenity
- Policy P59 Green infrastructure
- Policy P60 Biodiversity
- Policy P61 Trees
- Policy P62 Reducing waste
- Policy P65 Improving air quality
- Policy P66 Reducing noise pollution and enhancing soundscapes
- Policy P67 Reducing water use
- Policy P68 Reducing flood risk
- Policy P69 Sustainability standards
- Policy P70 Energy
- Policy IP3 Community infrastructure levy (CIL) and Section 106 planning obligations
- Site Allocation NSP46: 63-85 Newington Causeway

7.3 Relevant policies within the London Plan are as follows:

- Policy GG2 Making the best use of land
- Policy GG4 Delivering the homes Londoners need
- Policy SD1 Opportunity Areas
- Policy SD3 The Central Activities Zone (CAZ)
- Policy SD5 Offices, other strategic functions and residential development in the CAZ
- Policy SD6 Town centres and high streets
- Policy SD10 Strategic and local regeneration
- Policy D1 London's form, character and capacity for growth
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering good design
- Policy D5 Inclusive design
- Policy D8 Public realm

- Policy D9 Tall buildings
- Policy D12 Fire safety
- Policy D14 Noise
- Policy H1 Increasing housing supply
- Policy H5 Threshold approach to applications
- Policy H15 Purpose-built student accommodation
- Policy S2 Health and social care facilities
- Policy S3 Education and childcare facilities
- Policy E1 Offices
- Policy E2 Providing suitable business space
- Policy E3 Affordable workspace
- Policy E8 Sector growth opportunities and clusters
- Policy HC1 Heritage conservation and growth
- Policy HC3 Strategic and Local Views
- 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 7 Reducing waste and supporting the circular economy
- Policy SI 13 Sustainable drainage
- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets
- Policy T5 Cycling
- Policy T6 Car parking

8.0 Other relevant planning policy/guidance/material considerations

8.1 The following are material considerations in the determination of the planning application:

- The National Planning Policy Framework (July 2021)
- Planning Practice Guidance (March 2014 and updated on a continuous basis)
- LB Southwark Supplementary Planning Documents:
 - Elephant and Castle SPD/OAPF (2012)
 - Heritage SPD (2021)
 - Affordable Housing SPD (adopted 2008, draft update consulted on in 2011)
 - Development Viability SPD (2016)
 - Design and Access Statements SPD (2007)
 - Section 106 and CIL SPD (adopted 2015 and amended in November 2020)
 - Sustainability Assessments SPD (2009)
 - Sustainable Design and Construction SPD (2009)

- London Plan Supplementary Guidance:
 - Affordable Housing and Viability (August 2017)
 - Housing (March 2016)
 - Accessible London: Achieving an Inclusive Environment (October 2014)
 - The control of dust and emissions during construction and demolition (July 2014)
 - Character and Context (June 2014)
 - Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy (April 2013)
 - London Planning Statement (May 2014)
 - Planning for Equality and Diversity in London (October 2007)
 - Be Seen energy monitoring (September 2021)
 - Circular economy statements (March 2022)
 - Energy Planning Guidance (June 2022)
 - The control of dust and emissions in construction (July 2014)
 - Whole life carbon (March 2022)
 - Sustainable Transport, Walking and Cycling (September 2021 - draft)
 - Air quality neutral (September 2021 - draft)
 - Fire safety (February 2022 - draft)
 - Optimising Site Capacity: A Design-led Approach (February 2022 - draft)
 - Urban greening factor (September 2021 - draft)

9.0 Matters in Dispute

9.1 The Council considers that proposed development is contrary to policies P13 ('Design of places'), and P17 ('Tall buildings') of the Southwark Plan 2022 as:

- it fails to respond positively to the existing character and context and would as a result harm the local townscape,

9.2 The council considers that the public benefits of the proposal would not outweigh the harm that would be caused to the local townscape.

9.3 The Council considers that there are no other material considerations which indicate that it would be appropriate to grant planning permission.

9.4 Given the timetable for this appeal, the Appellant is unable to comment meaningfully upon paragraphs 9.1-9.3 above (which are text provided by the Council) as the Appellant has not yet had sight of the Council's reason(s) for refusal. As this is a non-determination appeal, the Appellant will be unable to comment conclusively upon which matters are agreed and those which are not until it has seen the Council's reason(s) for refusal. We understand that the Council intends to present a report to the Planning Committee on 2nd November for authority to challenge the appeal and the likely grounds for refusal if the application had been determined. If we consider it would be helpful to update the matters of agreement/disagreement once we are in receipt of the Council's reason(s) for refusal, then we will seek to agree a supplementary Statement of Common Ground in advance of the inquiry.

Appendix 1 – Core Documents List



AVONMOUTH HOUSE APPEAL CORE DOCUMENTS LIST

LPA Reference: 21/AP/4297

Part 05 (b) A list of all plans, drawings and documents (stating drawing numbers) submitted with the application to the LPA

No.	Name of Plan/Document	Reference	Author
1.0	Application Form and Site Ownership Certificate B	No doc ref provided	hgh Consulting
1.1	CIL Additional Information Requirement Form	No doc ref provided	hgh Consulting
Plans and Drawings			
1.2	Existing site location plan	21235 - STCH - XX - ZZ - DR - A - 1001	Stitch Architects
1.3	Existing site plan	21235 - STCH - XX - ZZ - DR - A - 1002	Stitch Architects
1.4	Existing site elevation – northeast	21235 - STCH - XX - ZZ - DR - A - 1003	Stitch Architects
1.5	Existing site elevations	21235 - STCH - XX - ZZ - DR - A - 1004	Stitch Architects
1.6	Existing site section	21235 - STCH - XX - ZZ - DR - A - 1005	Stitch Architects
1.7	Proposed site plan	21235 - STCH - XX - ZZ - DR - A - 1050	Stitch Architects
1.8	Proposed block plan	21235 - STCH - XX - ZZ - DR - A - 1051	Stitch Architects
1.9	Proposed building – Basement 2 plan	21235 - STCH - XX - B2 - DR - A - 1100	Stitch Architects
1.10	Proposed building – Basement plan	21235 - STCH - XX - B1 - DR - A - 1101	Stitch Architects
1.11	Proposed building – Ground floor plan	21235 - STCH - XX - 00 - DR - A - 1102	Stitch Architects
1.12	Proposed building – 1st floor plan	21235 - STCH - XX - 01 - DR - A - 1103	Stitch Architects
1.13	Proposed building – 2nd floor plan	21235 - STCH - XX - 02 - DR - A - 1104	Stitch Architects
1.14	Proposed building – 3 rd – 6 th floor plan	21235 - STCH - XX - ZZ - DR - A - 1105	Stitch Architects
1.15	Proposed building – 7 th floor plan	21235 - STCH - XX - 07 - DR - A - 1106	Stitch Architects
1.16	Proposed building – 8 th – 13 th floor plan	21235 - STCH - XX - ZZ - DR - A - 1107	Stitch Architects
1.17	Proposed building – 14 th – 15 th floor plan	21235 - STCH - XX - ZZ - DR - A - 1108	Stitch Architects
1.18	Proposed building – Roof plan	21235 - STCH - XX - RF - DR - A - 1109	Stitch Architects
1.19	Proposed building – North west elevation	21235 - STCH - XX - ZZ - DR - A - 1200	Stitch Architects
1.20	Proposed building – North east elevation	21235 - STCH - XX - ZZ - DR - A - 1201	Stitch Architects
1.21	Proposed building – South east elevation	21235 - STCH - XX - ZZ - DR - A - 1202	Stitch Architects
1.22	Proposed building – South west elevation	21235 - STCH - XX - ZZ - DR - A - 120	Stitch Architects
1.23	Proposed building – North east site elevation	21235 - STCH - XX - ZZ - DR - A - 1204	Stitch Architects
1.24	Proposed building – South east site elevation	21235 - STCH - XX - ZZ - DR - A - 1205	Stitch Architects
1.25	Proposed building - Section AA	21235 - STCH - XX - ZZ - DR - A - 1300	Stitch Architects
1.26	Proposed building - Section BB	21235 - STCH - XX - XX - DR - A - 1301	Stitch Architects

1.27	Proposed layouts Typical Ensuite 01	20221 - STCH - XX - ZZ - DR - A - 1400	Stitch Architects
1.28	Proposed layouts Typical Ensuite 02	20221 - STCH - XX - ZZ - DR - A - 1401	Stitch Architects
1.29	Proposed layouts Typical studio	20221 - STCH - XX - ZZ - DR - A - 1402	Stitch Architects
1.30	Proposed layouts Typical accessible studio	20221 - STCH - XX - ZZ - DR - A - 1403	Stitch Architects
1.31	Detail elevation study 01	20221 - STCH - XX - ZZ - DR - A - 1500	Stitch Architects
1.32	Detail elevation study 02	20221 - STCH - XX - ZZ - DR - A - 1501	Stitch Architects
1.33	Detail elevation study 03	20221 - STCH - XX - ZZ - DR - A - 1502	Stitch Architects
1.34	Detail elevation study 04	20221 - STCH - XX - ZZ - DR - A - 1503	Stitch Architects
1.35	Detail elevation study 05	20221 - STCH - XX - ZZ - DR - A - 1504	Stitch Architects
1.36	3D Massing Model	20221 - STCH - XX - ZZ - M1 - A - 1700	Stitch Architects
1.37	Landscape GA	TM-502-LA-101	Turkington Martin
1.38	Landscape Terrace	TM-502-LA-102	Turkington Martin
Documents			
1.39	Design and Access Statement, including: <ul style="list-style-type: none"> • Accessibility Statement • Secure by Design Statement 	No doc ref provided	Stitch Architects
1.40	Accommodation and Area Schedule	No doc ref provided	Stitch Architects
1.41	Landscape Statement (including Urban Greening Factor calculation)	TM502 RE07	Turkington Martin
1.42	Letter of support from the University of London	No doc ref provided	UoL
1.43	Letter from ETC Venues		ETC Venues
1.44	Planning Statement	No doc ref provided	hgh Consulting
1.45	Air Quality Assessment	2102760-01	Ardent
1.46	Flood Risk Assessment and Drainage Strategy (including SuDs Proforma)	2102760-04	Ardent
1.47	Delivery and Servicing Management Plan	2102760-10	Ardent
1.48	Car Park Management Plan	2102760-11	Ardent
1.49	Outline Construction Logistics Plan	2102760-09	Ardent
1.50	Student Management Plan (Transport)	2102760-06	Ardent
1.51	Framework Travel Plan	2102760-07	Ardent
1.52	Noise and Vibration Assessment	2102760-02A	Ardent
1.53	Utilities and Services Statement	2102760-05	Ardent
1.54	Healthy Streets Transport Assessment	2102760-08	Ardent
1.55	Daylight and Sunlight Assessment	P2747	Point 2
1.56	Overheating Assessment	No doc ref provided	JAW Sustainability

1.57	Circular Economy Statement	No doc ref provided	JAW Sustainability
1.58	Energy Strategy (including Carbon Emissions Reporting Spreadsheet)	No doc ref provided	JAW Sustainability
1.59	Sustainability Statement (including BREEAM Pre-Assessment)	No doc ref provided	JAW Sustainability
1.60	Life Cycle Carbon Assessment	No doc ref provided	JAW Sustainability
1.61	Archaeological Desk-Based Assessment	JAC27293	RPS
1.62	Fire Statement	F10245	Clarke Banks
1.63	Preliminary Ecological Appraisal	No doc ref provided	The Ecology Partnership
1.64	Wind Microclimate Assessment	No doc ref provided	Urban Microclimate
1.65	Statement of Community Involvement	No doc ref provided	Carvil Ventures
1.66	Engagement Summary (Development Consultation Charter)	No doc ref provided	Carvil Ventures
1.67	Ground Investigation and Basement Impact Assessment	P3637J2281/CLP	Jomas Associates
1.68	Student Housing Management Plan		Tribe
1.69	Heritage Townscape and Visual Assessment	No doc ref provided	Citydesigner (AVRs by The Visualiser)
1.70	Arboricultural Survey	5810/21-01 Rev 1	PJC Consultancy
1.71	Arboricultural Impact Assessment, Arboricultural Method Statement and Tree Protection Plan	5810/21-02 Rev 1	PJC Consultancy
1.72	Plant Assessment	No doc ref provided	hgh Consulting
1.73	Viability Report (Private and Confidential) and Executive Summary (Public)	No doc ref provided	James R Brown & Co
1.74	Southwark Student Housing Demand Study	No doc ref provided	Knight Frank
1.75	Employment Land Report	No doc ref provided	Union Street Partners

Part 06 (b): A list of all plans, drawings and documents (stating drawing numbers) which did not form part of the original application

No.	Name of Plan/Document	Reference	Author
Document submitted on 03 February 2022			
2.0	Letter of support from LSBU	No doc ref provided	LSBU
Document submitted on 20 April 2022			
2.1	Letter to case officer regarding LSBU involvement	No doc ref provided	hgh Consulting

Documents submitted on 13 May 2022			
2.2	Circular Economy Statement (Version 02)	No doc ref provided	JAW Sustainability
2.3	GLA Circular Economy Memo (Excel)	No doc ref provided	JAW Sustainability
2.4	GLA Whole Life Carbon Memo (Excel)	No doc ref provided	JAW Sustainability
2.5	GLA Whole Life Carbon Assessment Template (Excel)	No doc ref provided	JAW Sustainability
Documents, drawings and plans submitted on 27 May 2022			
2.6	Proposed building – Basement 2 plan	21235 - STCH - XX - B2 - DR - A – 1100 Rev A	Stitch Architects
2.7	Proposed building – Ground floor plan	21235 - STCH - XX - 00 - DR - A – 1102 Rev B	Stitch Architects
2.8	Proposed building – 2nd floor plan	21235 - STCH - XX - 02 - DR - A – 1104 Rev A	Stitch Architects
2.9	Proposed building – 3 rd – 6 th floor plan	21235 - STCH - XX - ZZ - DR - A – 1105 Rev A	Stitch Architects
2.10	Proposed building – 7 th floor plan	21235 - STCH - XX - 07 - DR - A – 1106 Rev A	Stitch Architects
2.11	Proposed building – 8 th – 13 th floor plan	21235 - STCH - XX - ZZ - DR - A – 1107 Rev A	Stitch Architects
2.12	Proposed building – 14 th – 15 th floor plan	21235 - STCH - XX - ZZ - DR - A – 1108 Rev A	Stitch Architects
2.13	Proposed layout Typical Ensuite 01	21235 - STCH - XX - ZZ - DR - A – 1400 Rev A	Stitch Architects
2.14	Proposed layout Typical Ensuite 02	21235 - STCH - XX - ZZ - DR - A – 1401 Rev A	Stitch Architects
2.15	Foul and Surface Water Drainage Drawing	2102760-001 Rev A	Ardent
2.16	Applicant team's response to GLA Stage 1 Report	No doc ref provided	hgh Consulting
2.17	Schedule of drawings to be replaced	No doc ref provided	hgh Consulting
2.18	Updated Fire Statement (25th May 2022)	F10245	Clarke Banks
2.19	TRICS Sensitivity Test	No doc ref provided	Ardent
2.20	Inclusive Design Statement	No doc ref provided	Stitch Architects
2.21	Design and Access Statement Addendum	No doc ref provided	Stitch Architects
2.22	Sustainability Statement (24th May 2022)	No doc ref provided	JAW Sustainability
2.23	Energy Strategy (24th May 2022)	No doc ref provided	JAW Sustainability
2.24	Overheating Assessment (25th October 2021)	No doc ref provided	JAW Sustainability
2.25	GLA Carbon Emissions Reporting Spreadsheet (Excel)	No doc ref provided	JAW Sustainability
2.26	Stage 1 GLA Consultation – Energy Memo (Excel)	No doc ref provided	JAW Sustainability
Documents, drawings and plans submitted on 30 June 2022			
2.27	Circular Economy Statement (Version 03)	No doc ref provided	JAW Sustainability
2.28	Proposed building – Ground floor plan	21235 - STCH - XX - 00 - DR - A – 1102 Rev C	Stitch Architects
2.29	Stitch Drawing Register	No doc ref provided	Stitch Architects
2.30	Schedule of drawings to be replaced v2	No doc ref provided	hgh Consulting
2.31	GLA Circular Economy Memo (Excel)	No doc ref provided	JAW Sustainability
2.32	GLA Whole Life Carbon Memo (Excel)	No doc ref provided	JAW Sustainability
2.33	GLA Whole Life Carbon Assessment Template (Excel)	No doc ref provided	JAW Sustainability

Documents submitted on 03 July 2022			
2.34	Energy Strategy (1st July 2022)	No doc ref provided	JAW Sustainability
2.35	Stage 1 GLA Consultation - Energy Memo (Excel)	No doc ref provided	JAW Sustainability

Part 09 (b): A list of all plans and drawings submitted but not previously seen by the LPA

No.	Name of Plan/Document	Reference	Author	Date
3.0	Economic Impact and Regeneration Statement	No doc ref provided	Propernomics Ltd	June 2022
3.1	Daylight and Sunlight Technical Note	No doc ref provided	Point 2	1 July 2022

Part 10: Any relevant correspondence with the LPA, including any supporting information submitted with your application in accordance with the list of local requirements.

No.	Name of Plan/Document	Author	Date
4.0	Email from senior officer - query re Nominations Agreement	LB Southwark	22 December 2021
4.1	Email to senior officer - confirmation on Nominations Agreement	hgh Consulting	23 December 2021
4.2	Email from senior officer - further clarification requested on Nominations Agreement	LB Southwark	4 January 2022
4.3	Email to senior officer – further information provided on Nominations Agreement	hgh Consulting	6 January 2022
4.4	Email to the case officer – update on consultation process	hgh Consulting	12 January 2022
4.5	Email to the case officer – update on viability audit	hgh Consulting	19 January 2022
4.6	Email to the case officer – request for consultation responses	hgh Consulting	25 January 2022
4.7	Email to senior officer – letter of support from LSBU	hgh Consulting and LSBU	3 February 2022
4.8	Emails to LB Southwark Planning Support – request for consultation responses	hgh Consulting	14, 17 February, 2 March 2022
4.9	Email from LB Southwark Planning Support – update on case officer	LB Southwark	3 March 2022
4.10	Email to LB Southwark Planning Support – request for consultation responses	hgh Consulting	7 March 2022
4.11	Email to the case officer – request for consultation responses and general update	hgh Consulting	14 March 2022
4.12	Email to LB Southwark Planning Support – request for consultation responses	hgh Consulting	22 March 2022
4.13	Email from LB Southwark Planning Support – case escalated	LB Southwark	24 March 2022
4.14	Email to the case officer – request for consultation responses	hgh Consulting	13 April 2022
4.15	Email to the case officer – letter confirming latest position re LSBU's involvement	hgh Consulting	20 April 2022

Appendix 2 – List of possible planning conditions

The following planning conditions are suggested in order to make the development acceptable in planning terms.

1. The development to which this permission relates must have commenced not later than the expiration of three years beginning from the date of this decision notice.

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

2. The development hereby permitted shall be carried out in accordance with the approved plans listed in this notice, unless otherwise required by any other condition in this notice.

Reason: To ensure that the Development is undertaken in accordance with the approved drawings and documents to achieve compliance with Development Plan Policies (London Plan 2021 and Southwark Plan 2022), and National Planning Policy Framework 2021.

3. 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 inbound 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.

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 Southwark Plan Policies P50 (Highways impacts) and P56 (Protecting amenity), London Plan Policy T4 (Assessing and mitigating transport impacts), and the National Planning Policy Framework.

4. a.) No development shall take place until a remediation scheme has been submitted to and approved in writing by the Local Planning Authority. Following the completion of the works and measures identified in the approved remediation strategy, a verification report providing evidence that all works required by the remediation strategy have been completed, together with any future monitoring or maintenance requirements shall be submitted to and approved in writing by the Local Planning Authority.

b.) 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.

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 Southwark Plan Policy P64 (Contaminated land and hazardous substances) and the National Planning Policy Framework.

5. No works (excluding demolition and site clearance) shall commence until full details of the proposed surface water drainage system incorporating the Sustainable Drainage Systems (SuDS) have been submitted to and approved in writing by the Local Planning Authority, including detailed design, dimensions, depth and location of attenuation units and flow control devices. The specific SuDS type, arrangement and material should be given in line with the proposed strategy dependant on any necessary site investigations. The strategy should achieve a reduction in surface water runoff rates as detailed in the approved 'Flood Risk Assessment and Drainage Strategy' prepared by Ardent. The applicant must confirm that the site is safe in the event of blockage/failure of the system, including consideration of exceedance flows. The site drainage must be constructed to the approved details.

Reason: To minimise the potential for the site to contribute to surface water flooding in accordance with Southwark's Strategic Flood Risk Assessment (2017), Policy SI 13 of the London Plan, and Policy P68 of the Southwark Plan.

6. Before any work hereby authorised begins, excluding demolition to ground slab level and 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.

In the event archaeology of national significance is found on the site, a scheme shall be submitted to the council for approval to ensure this will be preserved in-situ. The scheme shall be implemented during the construction period and within the completed development as approved.

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.

7. Before any work hereby authorised begins (excluding demolition to ground slab level and archaeological evaluation), 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.

8. a) Prior to commencement of the development (excluding demolition and site investigation works) hereby permitted, the applicant shall submit to and receive the Local Planning Authority's approval of a Public Engagement Programme which shall set out:
 - 1) How the field work areas will be hoarded to provide opportunities for passers-by to safely view the excavations;
 - 2) Detailed drawings (artwork, design, text and materials, including their location and a full specification of the construction and materials) for the public interpretation and presentation display materials celebrating the historic setting of the site, which will be located on suitably visible public parts of the temporary site hoarding;
 - 3) Details of at least one event, such as a heritage trail, that will be held during the field work phase (as a minimum this should state the date/time, duration, individuals involved and advance promotional measures for the event, and provide an outline of the content of the event);

b) Prior to the commencement of the fieldwork phase, the hoarding shall be installed in full accordance with the LPA-approved details referred to in parts a.1 and a.2 of the condition, and the hoarding shall remain as such and in place throughout the fieldwork phase.

c) During the fieldwork phase, the event (referred to in part a.3) shall be carried out.

d) Before first occupation of any part of the development, detailed drawings (artwork, design, text and materials, including their location and a full specification of the construction and materials) for the public interpretation and presentation display materials celebrating the historic setting of the site, in some form of permanent display case or signage to be installed within a publicly-accessible part of the development hereby approved. The approved display case or signage shall be installed in accordance with the approval and shall not be replaced other than with a display case or signage of similar specification and bearing the same information.

Reason: To promote the unique setting of the application site and provide information on the special archaeological and historical interest of this part of Southwark, in accordance with Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2022.

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

Reason: In order that the archaeological interest of the site is secured with regard to the details of the post-excavation works, publication and archiving to ensure the preservation of archaeological remains by record in accordance with Policy P23 (Archaeology) of the Southwark Plan, Policy HC1 (Heritage conservation and growth) of the London Plan, and the National Planning Policy Framework.

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

Reason: To minimise the risk to life and minimise building damage in the event of a fire, in accordance with the National Planning Policy Framework and Policy D12 (Fire safety) of the London Plan.

11. Prior to works commencing, including any demolition and no later than RIBA Stage 4, a Planning Stage Circular Economy Statement (CES) shall be submitted to and approved in writing by the Local Planning Authority. The CES shall include

- a Bill of Materials including kg/m² and recycled content (target for a minimum 20%) for the development;
- a Recycling and Waste Reporting table, evidencing that the proposal would reuse/recycle/recover 95% of construction and demolition waste, and put 95% of excavation waste to beneficial use;
- a Pre-demolition/Refurbishment Audit;
- a Letter of Commitment, pledging to submit a Post-Completion Report within 3 months of completion of the development;
- a Building End-of-Life Strategy;
- a Final Destination Facilities List; and
- evidence of any destination landfill sites' capacity to receive waste.

The development shall be implemented in accordance with the CES. Unless otherwise agreed by the Council, to comply with the Circular Economy Statement for the full life cycle of the Development.

Reason: To ensure that the proposal responds appropriately to climate change policies by reducing carbon emissions and minimising waste streams in accordance with London Plan Policies SI7 (Reducing waste and supporting the circular economy) and SI2 (Minimising greenhouse gas emissions), and Southwark Plan Policies P69 (Sustainability standards) and P70 (Energy).

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

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

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

Reason: To provide high quality digital connectivity infrastructure to contribute to London's global competitiveness in accordance with Policy SI6 of the London Plan.

14. Prior to the commencement of any above grade works (excluding demolition), details of bird and bat boxes shall be submitted to and approved in writing by the Local Planning Authority. The bird and bat boxes shall be installed with the development

prior to the first occupation of the building of which they form a part or the first use of the space in which they are contained. The bird and bat boxes shall be installed strictly in accordance with the details so approved and shall be maintained as such thereafter.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with Southwark Plan Policy P60 (Biodiversity).

15. Prior to commencement of any works above grade (excluding demolition), detailed drawings at a scale of 1:5 or 1:10 through:

- i) all facade variations; and
- ii) commercial fronts and residential entrances; and
- iii) all parapets and roof edges; and
- iv) all balcony details; and
- v) heads, cills and jambs of all openings

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

Reason: In order that the Local Planning Authority may be satisfied as to the quality of architectural design and details in accordance with Chapter 12 - Achieving well designed places of the NPPF, Policies D4 (Delivering good design) and D9 (Tall buildings) of the London Plan, and Policies P13 (Design of places), P14 (Design quality), and P17 (Tall buildings) of the Southwark Plan.

16. Prior to the commencement of any above grade works (excluding demolition), samples of all external facing materials and full-scale (1:1) mock-ups of the facades to be used in the carrying out of this permission shall be presented on site to the Local Planning Authority and approved in writing. The development shall not be carried out otherwise than in accordance with any such approval given. The facades to be mocked up should be agreed with the Local Planning Authority.

Reason: In order that the Local Planning Authority may be satisfied as to the quality of architectural design and details in accordance with Chapter 12 - Achieving well designed places of the NPPF, Policies D4 (Delivering good design) and D9 (Tall buildings) of the London Plan, and Policies P13 (Design of places), P14 (Design quality), and P17 (Tall buildings) of the Southwark Plan.

17. Prior to the commencement of any above grade works (excluding demolition), details of security measures shall be submitted and approved in writing by the Local Planning Authority and any such security measures shall be implemented prior to occupation in accordance with the approved details which shall achieve the 'Secured by Design' accreditation award from the Metropolitan Police.

Reason: In the interests of securing well designed, safe and secure buildings and neighbourhoods in accordance with Southwark Plan Policy P16 (Designing out crime).

18. Prior to the commencement of any above grade works (excluding demolition), details and 1:50 scale drawings of the secure cycle parking facilities to Southwark Plan 2022 standards shall be submitted for approval. This shall include 302 spaces, including 30 Sheffield racks providing for 60 spaces, including 3 disabled and 3 cargo bicycle spaces.

Details relating to the servicing layout and its relationship with the public highway shall be submitted to be approved in writing by the Local Planning Authority. The cycle parking facilities shall be provided prior to the occupation of the development and thereafter shall be retained and the space used for no other purpose and the development shall not be carried out otherwise than in accordance with any such approval given.

Reason: In order to ensure that satisfactory safe and secure cycle parking and changing facilities are provided and can be easily accessed by users 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 London Plan Policy T5 (Cycling) and Southwark Plan Policy P53 (Cycling).

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

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with Policies SI 4 (Managing heat risk), SI 13 (Sustainable drainage), G1 (Green Infrastructure), and G5 (Urban Greening) of the London Plan and Policies P59 (Green infrastructure) and P60 (Biodiversity) of the Southwark Plan.

20. Prior to the commencement of any above grade works (excluding demolition), the applicant shall submit written confirmation from the appointed building control body that the specifications for each student bedspace identified in the detailed construction plans meet the standard of the Approved Document M of the Building Regulations (2015). The development

shall be carried out in accordance with the details thereby approved by the appointed building control body.

M4 (Category 3) 'wheelchair user dwellings':- at least 5%

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

Reason: In order to ensure the development complies with Policy P5 (Student homes) of the Southwark Plan and Policy D7 (Accessible Housing) of the London Plan.

21. Prior to the commencement of any above grade works (excluding demolition), full particulars of the sprinkler system to be used within the building 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 in accordance with Policy D12 (Fire Safety) of the London Plan.

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

Reason: So that the Council may be satisfied with the details of the landscaping scheme, in accordance with Chapters 8, 12, 15 and 16 of the National Planning Policy Framework, Policies SI 4 (Managing heat risk), SI 13 (Sustainable drainage), G1 (Green Infrastructure), G5 (Urban Greening), G6 (Biodiversity and access to nature) and G7 (Trees and Woodlands) of the London Plan, and Policies P13 (Design of places), P14 (Design quality), P60 (Biodiversity) and P61 (Trees) of the Southwark Plan.

23. Prior to the commencement of any above grade works (excluding demolition), details shall be submitted to and approved in writing by the Local Planning Authority demonstrating that a minimum of at least two lifts (or more subject to capacity assessments) will be suitably sized fire evacuation lifts suitable to be used to evacuate people who require level access from the building. The development shall be carried out in accordance with these details and maintained as such in perpetuity.

Reason: In order to ensure that the proposed development complies with the requirements of the London Fire Brigade and

Policy D12 (Fire Safety) of the London Plan.

24. Before the first occupation of the building hereby permitted, a revised sustainability strategy shall be submitted to and approved in writing by the Local Planning Authority detailing water efficiency measures to be implemented in the development.

Reason: In order to ensure that the proposed development complies with the requirements of Policy SI 5 of the London Plan.

25. Within three months of completion of the development or commencement of RIBA Stage 6 (whichever occurs earlier) and in any event prior to the building being occupied (or handed over to a new owner (if applicable)), to submit the Post-Construction Whole Life-Cycle Carbon (WLC) Assessment to the GLA.

The WLC assessment shall be submitted to ZeroCarbonPlanning@london.gov.uk. The developer shall use the post construction tab of the GLA's WLC assessment template and the relevant forms must be completed accurately and in their 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 must be submitted along with supporting evidence as required by the GLA's WLC assessment guidance and, unless otherwise agreed by the Council, within three months of the completion of the development or commencement of RIBA Stage 6 (whichever occurs earlier).

Reason: To ensure whole life-cycle carbon is calculated and reduced and to demonstrate compliance with Policy SI 2 (Minimising Greenhouse Gas Emissions) of the London Plan.

26. Before the first occupation of the building hereby permitted, details of the arrangements for the storing of domestic and commercial refuse shall be submitted to and approved in writing by the Local Planning Authority and the facilities approved shall be provided and made available for use by the occupiers. The facilities shall thereafter be retained and shall not be used or the space used for any other purpose.

Reason: To ensure that the refuse will be appropriately stored within the site thereby protecting the amenity of the site and the area in general from litter, odour, and potential vermin/pest nuisance in accordance with the National Planning Policy Framework 2021 and Policies P56 (Protection of amenity) and P62 (Reducing waste) of the Southwark Plan 2022.

27. Before the first occupation of the building hereby permitted, a landscape management plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas shall be submitted to and approved in writing by the Local Planning Authority. The landscape management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the Local Planning Authority.

Reason: This condition is necessary to ensure the protection of wildlife and supporting habitat and to secure opportunities for the enhancement of the nature conservation value of the site, in accordance with the NPPF, Policies G1 (Green infrastructure),

G5 (Urban greening) and G6 (Biodiversity and access to nature) of the London Plan. It 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.

28. The student accommodation 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

Reason: To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with Southwark Plan Policy P56 (Protection of amenity) and the National Planning Policy Framework.

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

Reason: To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with Southwark Plan policy P56 ('Protection of amenity') and the National Planning Policy Framework 2021.

30. Party walls, floors and ceilings between the commercial premises and student accommodation shall be designed to achieve a minimum weighted standardized level difference of 60 dB DnTw+Ctr. Pre-occupation testing of the separating partition shall be undertaken for airborne sound insulation in accordance with the methodology of ISO 16283-1:2014.

Reason: To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with Southwark Plan policy P56 ('Protection of amenity') and the National Planning Policy Framework 2021.

31. Prior to the commencement of any use within use class E involving the cooking of food, full particulars and details of a scheme for the extraction and ventilation of the commercial kitchen shall be submitted to and approved by the Local Planning Authority. The scheme shall include:

- Details of extraction rate and efflux velocity of extracted air
- Full details of grease, particle and odour abatement plant
- The location and orientation of the extraction ductwork and discharge terminal
- A management servicing plan for maintenance of the extraction system to ensure that fumes and odours from the kitchen do not affect public health or residential amenity. Once approved the scheme shall be implemented in full and permanently maintained thereafter.

Reason: In order to ensure that any installed ventilation, ducting and ancillary equipment in the interests of amenity will not cause amenity impacts such as odour, fume or noise nuisance and will not detract from the appearance of the building in accordance with The National Planning Policy Framework and Southwark Plan Policy P56 (Protection of amenity).

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

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. To ensure that the development does not harm groundwater resources in line with the National Planning Policy Framework paragraph 183 and Policy P64 (Contaminated land and hazardous substances) of the Southwark Plan.

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

08.00 to 20.00hrs on Monday to Saturdays; and
10.00 to 16.00hrs on Sundays and Bank Holidays.

Reason: To ensure that 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; Policy T7 (Deliveries, Servicing and Construction) of the London Plan 2021; and Policy P50 (Highways Impacts) of the Southwark Plan 2022.

34. The Class E/F1(a) floorspace shall not be used except during the hours of 07.00 - 23.00 on any day.

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; and Policy P50 (Highways Impacts) of the Southwark Plan.

35. No drainage systems for the infiltration of surface water drainage into the ground are permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

Reason: To ensure that the development does not contribute to and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with the National Planning Policy Framework paragraph 183 and Policy P64 (Contaminated land and hazardous substances) of the Southwark Plan.

36. The development hereby permitted shall be constructed to include the energy efficiency measures stated in the Energy Strategy prepared by JAW and submitted in support of the application. All measures and technologies shall remain for as long as the development is occupied, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure the development complies with the National Planning Policy Framework, Strategic Policy SP4 of the Southwark Plan, and Policy S1 2 (Minimising greenhouse gas emissions) of the London Plan.

37. The existing trees on or adjoining the site which are to be retained shall be protected and both the site and trees managed in accordance with the recommendations contained in the Arboricultural Method Statement. 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 Parts 8, 11, 12, 15 and 16, Policies G1 (Green Infrastructure), G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan, and Policy P61 (Trees) of the Southwark Plan.

Appendix 3 – List of possible s106 Heads of Terms

The following planning obligations are suggested in order to make the development acceptable in planning terms:

1. Restriction on occupation of the student accommodation by students of a Higher Education Institution;
2. Not to occupy the student accommodation until a Nomination Agreement has been entered into with either London South Bank University, University of London, or another Higher Education Institution in respect of the student accommodation;
3. To provide 35% of the student accommodation as affordable student accommodation as defined through the London Plan;
4. Approval of a detailed Student Accommodation Management Plan (SAMP) prior to occupation and compliance with the SAMP for the duration that the development remains occupied;
5. To provide 5% of the student accommodation as wheelchair accessible;
6. To provide 10% of the 1,733sqm GIA non-purpose-built student accommodation floorspace as affordable workspace should it be implemented as E class floorspace;
7. Payment of the carbon offset contribution prior to occupation;
8. Provision of one disabled car parking space and an electric vehicle charging point as part of the disabled parking space;
9. Restriction on car parking permits for occupants of the development;
10. Payment of a cycle hire contribution to TfL (£120,000);
11. Provision of public realm and highways improvements through a Section 38/278 Agreement;
12. Approval of a Construction Skills and Employment Plan prior to implementation of the development;
13. Approval of the Energy Strategy prior to occupation;
14. To achieve the agreed carbon targets contained within the approved energy strategy;
15. Approval of a Delivery and Service Management Plan prior to occupation;
16. Approval of a Demolition Environmental Management Plan prior to any works of demolition;
17. Approval of a Construction Environmental Management Plan prior to implementation; and
18. Payment of an administration and monitoring fee.

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COMMITTEE: PLANNING COMMITTEE

NOTE: Original held in Constitutional Team; all amendments/queries to Gerald Gohler, Constitutional Team, Tel: 020 7525 7420

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