

## Planning Committee

Wednesday 29 March 2023

6.30 pm

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

### Membership

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

### Reserves

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

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### INFORMATION FOR MEMBERS OF THE PUBLIC

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#### Access to information

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#### Contact

Gregory Weaver on 020 7525 3667 or email: [greg.weaver@southwark.gov.uk](mailto:greg.weaver@southwark.gov.uk)

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Members of the committee are summoned to attend this meeting

**Althea Loderick**

Chief Executive

Date: 21 March 2023



# Planning Committee

Wednesday 29 March 2023

6.30 pm

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

## Order of Business

Item No.	Title	Page No.
	<b>PART A - OPEN BUSINESS</b>	
	<b>PROCEDURE NOTE</b>	
<b>1.</b>	<b>APOLOGIES</b>	
	To receive any apologies for absence.	
<b>2.</b>	<b>CONFIRMATION OF VOTING MEMBERS</b>	
	A representative of each political group will confirm the voting members of the committee.	
<b>3.</b>	<b>NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT</b>	
	In special circumstances, an item of business may be added to an agenda within five clear days of the meeting.	
<b>4.</b>	<b>DISCLOSURE OF INTERESTS AND DISPENSATIONS</b>	
	Members to declare any personal interests and dispensation in respect of any item of business to be considered at this meeting.	
<b>5.</b>	<b>MINUTES</b>	3 - 7
	To approve as correct records the minutes of the meetings held on 21 February 2023 and 8 March 2023.	

<b>Item No.</b>	<b>Title</b>	<b>Page No.</b>
6.	<b>S106 OR POLICY ITEM</b>	8 - 20
7.	<b>DEVELOPMENT MANAGEMENT</b>	21 - 25
7.1.	<b>21/AP/2838 - 21 ST GEORGES ROAD</b>	26 - 244
7.2.	<b>21/AP/0681 - 24 CRIMSCOTT STREET</b>	245 - 380

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

**EXCLUSION OF PRESS AND PUBLIC**

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

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

**PART B - CLOSED BUSINESS**

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

**DISTRIBUTION LIST**

Date: 21 March 2023

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

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

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

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

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

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

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

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

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



## Planning Committee

MINUTES of the Planning Committee held on Wednesday 8 March 2023 at 6.30 pm at Ground Floor Meeting Room G02 - 160 Tooley Street, London SE1 2QH

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

**OTHER MEMBERS PRESENT:** Councillor Irina Von Wiese  
Councillor David Watson

**OFFICER SUPPORT:** Colin Wilson (Head of Strategic Development)  
Nagla Stevens (Deputy Head of Law)  
Dipesh Patel (Group Manager, Major Applications and New Homes Team)  
Victoria Crosby (Team Leader, Development Management)  
Richard Craig (Team Leader, Design and Conservation)  
Gerald Gohler (Constitutional Officer)

### 1. APOLOGIES

There were apologies for absence from Councillors Reginald Popoola and Cleo Soanes.

### 2. CONFIRMATION OF VOTING MEMBERS

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

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

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

### 4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

There were none.

### 5. DEVELOPMENT MANAGEMENT

#### RESOLVED:

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

#### 5.1 RED LION COURT, 46-48 PARK STREET, LONDON SE1 9EQ

##### Planning Application Number: 22/AP/1602

Report: see pages 6 to 149 of the main agenda pack and pages 1 to 6 of the addendum report.

**PROPOSAL:** *Demolition of the existing building above ground and part basement and redevelopment of the site to provide an 11-storey stepped building with rooftop plant, plus a two storey basement, providing office, retail, restaurant and wellness uses alongside external terraces, landscaping, public realm works, new plant equipment, internal loading bays, cycle parking spaces and other associated works.*

The committee heard the officer's introduction to the report. Members put questions to officers.

Representatives for the objectors addressed the meeting and responded to questions from members of the committee.

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

Councillor Irina von Wiese addressed the committee in her capacity as a ward councillor and responded to questions from members of the committee.

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

The committee put further questions to officers and discussed the application.

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

**RESOLVED:**

1. That planning permission be granted, subject to:
  - a. The conditions set out in the report and amended by the addendum report.
  - b. An amended condition 50 to stipulate that use of the external terraces on the northern edge of the development only be allowed between the hours of 9:00 to 23:00 hours, and use of the external terraces on the southern edge of the development only be allowed between 9:00 and 19:00 hours.
  - c. An additional condition stipulating that the southern external terraces on the sixth floor are not to be accessed by employees of the building.
  - d. An informative be added advising the applicant that the construction management plan which is conditioned submitted for approval should include information regarding the consultation undertaken with local residents about the construction management plan, in particular addressing the cumulative impact of the development with the neighbouring development and the way the needs of residents with protected characteristics have been taken into account.
  - e. Referral to the Mayor, and
  - f. The applicant entering into an appropriate legal agreement by no later than the 31 May 2023.
2. That in the event that the requirements of (1.) are not met by the 31 May



2023, the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 307 of the report.

At this point the committee adjourned for a comfort break from 8.25pm to 8.33pm.

## 5.2 160 BLACKFRIARS ROAD, LONDON SE1

### Planning Application Number: 22/AP/3049

Report: see pages 150 to 240 of the main agenda pack.

**PROPOSAL:** *Minor material amendments by variation of Condition 1 'Approved Plans' and Condition 30 'Number of Hotel Bedrooms' of planning permission ref. 20/AP/0556 (Erection of an eight storey building with basement, comprising a hotel (Class C1), flexible commercial or community unit (Class B1/D1), retail floorspace (Class A1/A3), creation of public space, landscaping and associated works. Works to the existing office building at ground and roof levels (including a new rooftop terrace, balustrades and PV panels); elevational alterations; and alterations associated with the creation of a new entrance on the Blackfriars Road elevation).*

The committee heard the officer's introduction to the report. Members put questions to officers.

There were no objectors who wished to speak.

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

A supporter living within 100 metres of the development site addressed the committee and responded to questions put by members of the committee.

Councillor David Watson addressed the committee in his capacity as a ward councillor and responded to questions from members of the committee.

The committee put further questions to officers and the applicant's representative, and discussed the application.

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

### **RESOLVED:**

1. That an amended planning permission be granted subject to revised conditions to those imposed on the 2020 permission, and the completion of a deed of variation to the original legal agreement.

2. That in the event that the requirements of paragraph 1 above are not met by 8 June 2023, the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 174 of the report.

The meeting ended at 9.25 pm.

**CHAIR:**

**DATED:**

<b>Item No.</b> 6	<b>Classification:</b> Open	<b>Date:</b> 29 March 2023	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>		Release of £60,005,726.73 from S106 agreements across the borough to support Housing Investment	
<b>Ward(s) or groups affected:</b>		All	
<b>From:</b>		Director of Planning and Growth	

## RECOMMENDATION

1. That the Planning Committee agrees the release of funds totaling £60,005,726.73 of S106 Affordable Housing funding, received against the legal agreements set out in Appendix A, to the S106 Affordable Housing Fund in order to deliver affordable housing across Southwark.

## BACKGROUND INFORMATION

2. Planning obligations are used to mitigate the negative impacts caused by a development and contribute towards providing infrastructure and facilities necessary to achieve sustainable communities. In order to achieve this, the Council enters into a legal agreement with a developer whereby the developer agrees to provide planning contributions and/or enters into various planning obligations. These obligations may take the form of financial contributions, including towards affordable housing.
3. The council expects affordable housing to be provided by developers on-site. In exceptional circumstances where a developer has justified, in accordance with both the council's planning policy requirements and the London Plan, that the affordable housing cannot be built on-site, the affordable housing should be provided off-site. If this is not possible then the Council may allow a contribution to be secured by way of an in-lieu payment. All in-lieu payments received by the council in this way and approved by Planning Committee are combined to form the S106 Affordable Housing Fund. This fund is ring-fenced to help finance the council's New Homes Programme.
4. The Planning Committee approved a release report for S106 for the council's housing programme in July 2020. The funds released by that report have helped support the New Homes Programme. The units provided by this programme will deliver new affordable homes and contribute towards the council's commitment to build 11,000 new council homes by 2043, as per the Council Plan 2018-22. 2,500 of these homes have been delivered or started on site before May 2022. Current plan for 2022-26 includes 1,000 Social and 500 Key Workers Homes.

5. This release of S106 funding to the S106 Affordable Housing Fund will enable the council to support the cost of delivering affordable homes included within the council's housing investment programme. Different schemes are at different stages of development, although the Capital Programme Refresh report presented to Cabinet in January 2023 showed that the New Homes Programme expects to spend £973 million over the next six years. This is expected to be financed from several sources, such as Right-to-Buy receipts, the Section 106 Affordable Housing Fund, and external borrowing within prudential limits.

### **KEY ISSUES FOR CONSIDERATION:**

6. Subject to Planning Committee approval, the Section 106 sums described in Appendix A will be added to the S106 Affordable Housing Fund and be used to help finance the council's New Homes Programme. The S106 sums released since July 2020 have contributed to the delivery of 305 new affordable homes to the council. By way of an example as to the progress of the Southwark Construction programme, the council has delivered the following:

- Alfred Fagon Apartment Terraces (Copeland Road Car Park)
- Harold Moody Court and Prout House (Goschen Estate)
- John Gorsuch House ( Daniels Road)
- Leathermarket (Joyce Newman House)
- Lilac House (Meeting House Lane)
- Welsford Street Garages

See Appendix B for Leathermarket (Joyce Newman House) development completed in May 2022, providing 40 new council homes; Harold Moody Court (Goschen Estate), completed in July 2022, providing 17 new council homes; John Gorsuch House ( Daniels Road), completed in September 2022, providing 19 new council homes; Lilac House (Meeting House Lane), completed in March 2022, providing 29 new council homes

7. The council's Southwark Construction Programme, to which these S106 sums will be contributing, has a total of 2,027 homes on site including 202 replacement homes and 287 homes are expected to commence within next 12 months, 51 of which are replacement homes. With this, the council is making significant steps toward its commitment to deliver 1,500 new council homes by 2026.
8. The S106 Affordable Housing Fund of which these sums being released will form a part will help to contribute towards the funding of the following schemes, which are currently on site:

Project	Ward	No. of New Council Homes (New + Replacement)	No. of New Council Homes (New Only)

17-19 Wood Vale SE23 3DS	Dulwich Village	6	6
18-19 Crimscott Street SE1 S106 purchase	London Bridge & West Bermondsey	13	13
2 Linden Grove (hostels) Ph5b	Peckham Rye	6	6
35-41 Nunhead Lane	Rye Lane	12	12
38 Mary Datchelor Close SE5 7AX	Nunhead & Queens Road	13	13
87 Gosvenor Park	Newington	2	2
Adrian & Dennis (39-44 Rutley Close)	Newington	25	25
Aylesbury_FDS Package A	Faraday	229	229
Aylesbury_FDS Package B	Faraday	352	352
Bassano Street (Garages)	Goose Green	4	4
Bells Gardens Community Centre	Peckham	83	83
Breamore House	Old Kent Road	1	1
Canada Water (Plot K1) S106 Purchase	Rotherhithe and Surrey Dock	79	79
Cator Street Extra Care Phase 2	Peckham	58	58
Cherry Gardens School, Macks Road SE16 [A4] [Development Agreement]	South Bermondsey	26	26
Comber House Drying Rooms	Camberwell Green	6	6
Commercial Way	Peckham	74	74
Fendall&Maltby	London Bridge & West Bermondsey	40	40
Fenham Road Garages	Peckham	5	5
Flaxyard site, Sumner Road SE15 (Lot B) HZ [Direct Delivery] With Peckham Library Square	Peckham	96	96
Former Rotherhithe Civic Centre, Albion Street, SE16 7BS and; Rear of Albion Primary School (Southern End), Albion Street, SE16 7JD	Rotherhithe	39	39
Haddonfield Garages	Rotherhithe	14	14
Heaton House	Rye Lane	8	8
Henslowe Road (Garages)	Dulwich Hill	3	3
Lindley Estate 157-177 Commercial Way	Old Kent Road	44	44
Lomond Grove	Camberwell Green	22	22
New Almshouse at 94-116 Southwark Park Road	South Bermondsey	57	57
Penry Street New Homes (was petrol Stn. Old Kent Road)	South Bermondsey	13	13
Regina & Columbia Point (part of Canada Est QHIP row 299)	Rotherhithe	2	2

Rennie Estate	South Bermondsey	49	49
Rye Hill Park Garages	Peckham Rye	23	23
Salisbury Est Car Park (Balfour Street)	North Walworth	26	26
Sceaux Gardens (Florian and Racine inc some garages)	St Giles	79	79
Sedgemoor Place (TA)	St Giles	13	13
Shops & Council Offices, Manor Place /Stopford Road SE17 [A1]	Newington	30	30
Slippers Estate	North Bermondsey	18	18
Styles House	Borough & Bankside	25	25
TA-Contract 1	Camberwell Green	12	12
TA-Contract 2	Camberwell Green	15	15
TA-Contract 3	Old Kent Road	10	10
Tenda Road	South Bermondsey	12	12
Tissington Silverlock Estate underground garages	Rotherhithe	35	35
Tustin Regeneration	Old Kent Road	345	143
Underhill Road	Dulwich Hill	3	3
Workshops, 42 Braganza Street SE17 [A1]	Newington	0	0
<b>Total on Site</b>		<b>2027</b>	<b>1825</b>

9. The S106 Affordable Housing Fund will also be utilised for the following schemes which have received planning permission and are expected to commence over the next twelve months:

Project	Ward	No. of New Council Homes (New + Replacement)	No. of New Council Homes (New Only)
66 Linden Grove	Peckham Rye	27	27
Ledbury Towers	Old Kent Road	260	51

10. Resources from the S106 Affordable Housing Fund will be necessary in order to complete the financing for 1,500 new homes by 2026, of which these new homes projects are a part. It is for this reason that this report recommends that the Planning Committee release the sums described in Appendix A.

11. These projects will help deliver our Fairer Future Commitments by making Southwark a more connected and sustainable borough to live in.

12. The New Homes Programme particularly supports the second Fairer Future Commitment, *A Place to Belong*.

### **Community impact statement**

13. The 2019 Strategic Housing Market Assessment demonstrated a continuing need for affordable housing, with the borough experiencing very high house prices that are outside the reach of many of its residents. It has the highest house prices in the housing sub-region (the average 2 bedroom flat being sold for £521k in December 2022). At the time of the 2011 census there were 18,547 overcrowded households in Southwark, a higher number, and a higher percentage (15.3%), than any of the other four boroughs in the sub-region. Over the period 1981- 2012 the population of Southwark increased by 34%, the fastest growth in the sub-region by some margin. The 2016 average growth assumption from the GLA was 2,094 each year.
14. This proposal to increase the supply of affordable homes in the borough will benefit households in housing need from all Southwark's communities.
15. The provision of this housing is in line with community needs and will create stronger communities. This in turn will improve the quality of life of people in Southwark and encourage community cohesion.
16. It is not considered that the proposal has any impact on any particular age, disability, faith or religion, race and ethnicity and sexual orientation.
17. The Public Sector Equality Duty requires public bodies to consider all individuals when carrying out their day to day work, in shaping policy, in delivering services and in relation to their own employees. It requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities. The council's consultation with residents on the 11,000 council homes programme has been specifically designed to be inclusive of all the borough's communities and provide a range of mechanisms to provide residents with the opportunity to engage.
18. The Southwark Construction team undertakes full equalities impact assessments for each project within the programme, to be completed prior to commencement of works on each site at the feasibility stage. This is to ensure that there is no disproportionate or discriminatory impact on groups with protected characteristics.
19. By providing a stronger link between the New Homes Programme and working with the Great Estates agenda and utilising social regeneration indicators linked to council plan objectives, the programme will help target those most in need to deliver community benefits.

### **Resource implications**

20. The developments set out in Appendix A secured of £60,005,726.73, combined, in contributions towards the provision of Affordable Housing. All of the £60,005,726.73 is currently unallocated and available.
21. The proposed allocation accords with the individual S106 agreements and would provide appropriate mitigation for the impacts of the specific and future developments.
22. Subject to Planning Committee's approval, this sum of £60,005,726.73 will be ring-fenced as S106 Affordable Housing Fund monies.

## **Consultation**

23. Each site has been subject to the usual planning consultation process and has been assessed as being acceptable, with planning permission being granted for each site.
24. Consultation is a key part of the New Homes Programme, and will be undertaken in respect of the stakeholders concerned with each housing development at multiple stages during the project lifecycle. Some of the New Homes projects are not yet at the consultation stage, but these will in their turn be subject to the same processes of consultation and community involvement.
25. Consultation on individual sites is being undertaken in line with the council's Charter of Principles and continues to provide mechanisms for current and prospective residents to engage with the development of new homes.

## **SUPPLEMENTARY ADVICE FROM OTHER OFFICERS**

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

26. The proposed allocation accords with the above mentioned agreements and would provide appropriate mitigation for the impacts of the specific and future developments.
27. The affordable housing contributions received can only be used for new affordable housing beyond what is required by the donor site. The affordable housing requirements for the identified donor sites have been calculated and the proposed allocation will be to the additional affordable housing beyond what is required. These accord with the justification for the contribution and the legal agreement.

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

28. This report requests that Planning Committee authorises the release of £60,005,726.73 from a number of s.106 planning agreements which are listed in Appendix A.
29. S.106 financial contributions must be spent in accordance with the terms of the individual agreement and also in accordance with Regulation 122 of



the Community Infrastructure Regulations 2010 (as amended). The agreements listed in Appendix A have been individually reviewed and checked and the proposed expenditure is in accordance with the specific agreements and also Regulation 122. The table at Appendix A also specifies where the contribution includes interest or a late payment charge which has resulted in a slight uplift to the amount specified in the agreement.

30. The decision to consider and approve the expenditure of section 106 monies is reserved to Planning Committee under Part 3F paragraph 9 of the Constitution therefore this decision is capable of being taken by Planning Committee.

### **Strategic Director of Finance and Governance CAP22/075**

31. This report requests the planning committee to approve the release of £60,005,726.73 section 106 Affordable Housing Funds from the agreements set out in Appendix A, towards the delivery of the Council's affordable housing programme. Details set out in the body of this report.
32. The strategic director of finance and governance notes the resource implications at paragraphs 19-21, the supplementary advice at paragraphs 25-26, confirms that the Council has received the related funds and they are available for the purpose outlined in this report.
33. Staffing and any other costs associated with this recommendation are to be contained within existing budgets.

### **BACKGROUND DOCUMENTS**

<b>Background Papers</b>	<b>Held At</b>	<b>Contact</b>
Copies of S106	160 Tooley Street London SE1 2QH	David Whitehead 07732 828276
Council Plan 2022-26	<a href="https://www.southwark.gov.uk/council-and-democracy/fairer-future/fairer-greener-safer-southwark-s-council-delivery-plan">https://www.southwark.gov.uk/council-and-democracy/fairer-future/fairer-greener-safer-southwark-s-council-delivery-plan</a>	
Capital programme update for 2022-23 to 2031-32	<a href="https://modern.gov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=7342&amp;Ver=4">https://modern.gov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=7342&amp;Ver=4</a>	Amarjit Uppal, Chief Accountant

### **AUDIT TRAIL**

<b>Lead Officer</b>	Stuart Davis, Director New Homes
<b>Report Author</b>	David Whitehead, Apprentice Planner
<b>Version</b>	Version V4

<b>Date</b>	9 February 2023	
<b>Key Decision?</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments included</b>
Director of Law and Democracy	Yes	Yes
Strategic Director of Finance and Governance	Yes	Yes
Director of Planning	Yes	Yes
Cabinet Member	No	No
Date final report sent to Constitutional Team		16 March 2023

## APPENDICES

No.	Title
A	S106 agreements delineated by funds available and intended purpose
B	Evidence of homes delivered by Southwark Construction Programme

## APPENDIX A

Profit Centre	App Ref	New Ward	Address:	Available Balance
W06901	13/AP/0966	Borough & Bankside	169-173 Blackfriars Road (bounded by Surrey Row and Pocock Street), London, SE1 8ER	£163,795.62
W08891	17/AP/3281	London Bridge & West Bermondsey	11-13 Spa Road, London, SE16 3RB	£1,625,000.00
W08881	19/AP/2087	Peckham	Eagle Wharf 90-96 Peckham Hill Street, London, SE15 5JT	£500,000.00
W08841	18/AP/0156	Old Kent Road	272 St James's Road, London, SE1 5JX	£1,176,835.82
W08841	18/AP/0156	Old Kent Road	272 St James's Road, London, SE1 5JX	£1,176,835.82
W08841	18/AP/0156	Old Kent Road	272 St James's Road, London, SE1 5JX	£1,176,835.82
W09121	20/AP/0039	Old Kent Road	Bianca Warehouse, 43 Glengall Road & 1 Bianca Road, London	£1,268,779.5
W09091	21/AP/0307	Chaucer	Travel Lodge Hotel Ceramic Building, 87 Newington Causeway, London, Southwark, SE1 6BD	£140,000
W08841	18/AP/0156	Old Kent Road	272 St James's Road, London, SE1 5JX	£80,255.01

W06781	12/AP/3558	Borough & Bankside	90-91 AND 92 Blackfriars Road, London, SE1 8HW	£550,000.00
W08281	14/AP/3104	Dulwich Village	The Workshop Site, Land Bounded by Gilkes Place, Gilkes Crescent and Calton Avenue to the rear of 25 Dulwich Village, London, SE21 7BW	£259,645.06
W08881	19/AP/2087	Peckham	Eagle Wharf 90-96 Peckham Hill Street, London, SE15 5JT	£1,147,208.12
W09061	18/AP/0900	London Bridge & West Bermondsey	Capital House, 42-46 Weston Street, London, SE1 3QD	£12,735,518.29
W09221	18/AP/3991	North Bermondsey	386 Southwark Park Road, London, SE16 2ET	£136,776.58
W09221	18/AP/3991	North Bermondsey	386 Southwark Park Road, London, SE16 2ET	£136,776.58
W08901	18/AP/2295	South Bermondsey	77-89 Alscot Road, London, SE1 3AW	£2,850,000.00
W08901	18/AP/2295	South Bermondsey	77-89 Alscot Road, London, SE1 3AW	£2,850,000.00
W05701	11/AP/0963	Rotherhithe	41-55 Rotherhithe Old Road, London, SE16 2PR	£1,200,000.00
W08891	17/AP/3281	London Bridge & West Bermondsey	11-13 Spa Road, London, SE16 3RB	£3,579,850.75
W08891	17/AP/3281	London Bridge & West Bermondsey	11-13 Spa Road, London, SE16 3RB	£1,789,925.37
W08881	19/AP/2087	Peckham	Eagle Wharf 90-96 Peckham Hill Street, London, SE15 5JT	£2,933,164.13
W08321	17/AP/0367	Borough & Bankside	Southwark Fire Station, 94 Southwark Bridge Road, London, SE1 0EG, Grotto Place and Grotto Podiums	£13,856,722.00
W07811	14/AP/3842	Borough & Bankside	185 Park Street, London, SE1 9BL	£8,627,454.76
W05701	11/AP/0963	North Bermondsey	41-55 Rotherhithe Old Road, London, SE16 2PR	£44,347.50
				£60,005,726.73

### Source of funding by Ward:

Ward	S106 generated
Borough & Bankside	£23,197,972.38
Chaucer	£140,000.00
Dulwich Village	£259,645.06
London Bridge & West Bermondsey	£19,730,294.41
North Bermondsey	£317,900.66
Old Kent Road	£4,879,541.97

Peckham	£4,580,372.25
Rotherhithe	£1,200,000.00
South Bermondsey	£5,700,000.00
	£60,005,726.73

**Indexation and Late Payment Interest:**

Concerning the available balances above, of the £60,005,726.73 collected, £4,187,015.07 represents indexation and £22,939.05 is late payment interest.

**APPENDIX B**



Leathermarket (Joyce Newman House)



Harold Moody Court (Goschen Estate)



John Gorsuch House (Daniels Road)



Lilac House (Meeting House Lane)

<b>Item No.</b> 7.	<b>Classification:</b> Open	<b>Date:</b> 29 March 2023	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>		Development Management	
<b>Ward(s) or groups affected:</b>		All	
<b>From:</b>		Proper Constitutional Officer	

### RECOMMENDATIONS

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

### BACKGROUND INFORMATION

4. The council's powers to consider planning business are detailed in Part 3F which describes the role and functions of the planning committee and planning sub-committees. 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**

#### **Assistant Chief Executive – Governance and Assurance**

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 assistant chief executive – governance and assurance, 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 assistant chief executive – governance and assurance. 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**

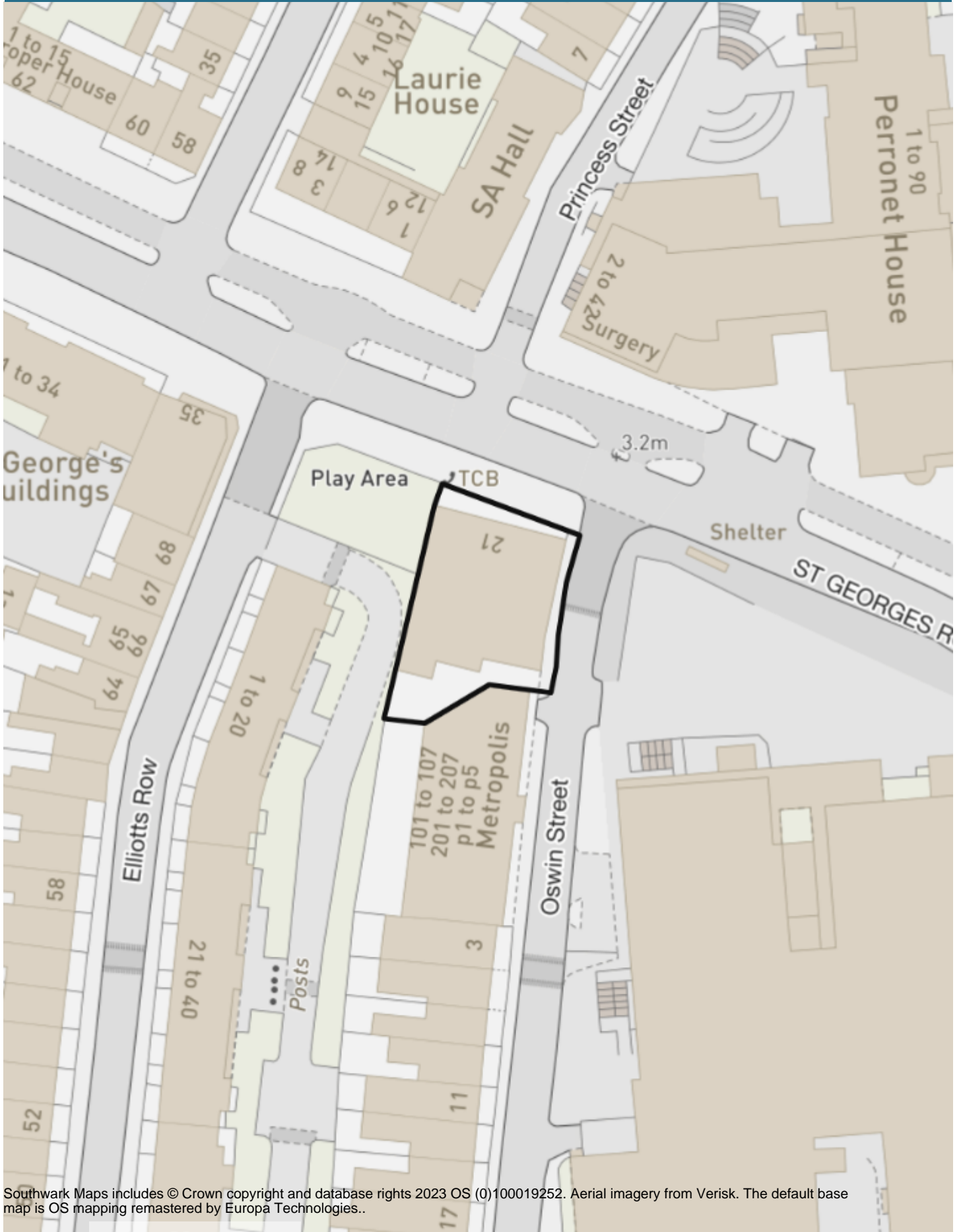
<b>Lead Officer</b>	Chidilim Agada, Head of Constitutional Services	
<b>Report Author</b>	Gregory Weaver, Constitutional Officer Nagla Stevens, Deputy Head of Law (Planning and Development)	
<b>Version</b>	Final	
<b>Dated</b>	17 February 2023	
<b>Key Decision?</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments sought</b>	<b>Comments included</b>
Assistant Chief Executive – Governance and Assurance	Yes	Yes
Director of Planning and Growth	No	No
<b>Cabinet Member</b>	No	No
<b>Date final report sent to Constitutional Team</b>	17 February 2023	

# Agenda Item 7.1



21/AP/2838

21 St George's Road, London, Southwark



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<b>Item No.</b>	<b>Classification:</b>	<b>Date:</b>	<b>Meeting Name:</b>
7.1	OPEN	29 March 2023	Planning Committee
<b>Report title:</b>	<b>Development Management planning application:</b> Application 21/AP/2838 for: Full Planning Permission  <b>Address:</b> 21 St George's Road, London, Southwark  <b>Proposal:</b> Redevelopment of the site to include demolition of the existing building and the construction of a new 15-storey building with rooftop plant, containing a hotel, office, retail and restaurant space, together with public realm improvements and other associated works.		
<b>Ward(s) or groups affected:</b>	St Georges		
<b>From:</b>	Director of Planning and Growth		
<b>Application Start Date</b> 09.08.2021		<b>Application Expiry Date</b> 08.11.2021	
<b>Earliest Decision Date</b> 17.05.2022		<b>Extension of Time End Date</b> 29.09.2023	

## RECOMMENDATION

1.
  - a) That full planning permission be granted for 21/AP/2838, subject to conditions, referral to the Mayor of London and the applicant entering into a satisfactory legal agreement.
  - b) That in the event that the legal agreement is not been entered into by 29th September 2023 the Director of Planning and Growth be authorised to refuse planning permission for 21/AP/2838, if appropriate, for the reasons set out in paragraph 435 of this report.

## EXECUTIVE SUMMARY

2. Located in Elephant and Castle and occupying a prominent position on the southern side of St George's Road, the application site is in the Major Town Centre, the Central Activities Zone and an Opportunity Area. It comprises a pair of side-by-side three-storey buildings, one dating from the 1930's and the other from the 1950's, which have been internally connected to provide commercial premises. The application site is located adjacent to the Elliott's Row Conservation Area, while approximately 100 metres to the west of the application site is the West Square Conservation Area. The site is in the safeguarded area of the potential future Bakerloo Line Extension promoted by Transport for London.



3. The proposal is for the mixed-use redevelopment of the site comprising a single building, partly of three storeys and partly of fifteen, with a further two storeys of accommodation at basement level. Standing 50.29 metres above ground level at its maximum point, the building would contain an 89-bedroom hotel, office floorspace, a restaurant/café and an affordable micro retail unit. 10% of the office floorspace would be secured at affordable rates, and the meeting rooms within the office would be available outside normal working hours for free-of-charge use by the community. Extended public realm is proposed along St George's Road and Oswin Street, in addition to highway and footway improvement works within the vicinity of the site.



*Image 01: Visualisation of the development in the current-day context, as seen looking eastwards along St George's Road*

4. 239 members of the public have commented on the application, submitting a total of 253 representations. Of the 239 respondents, 230 objected, three made a neutral comment and 6 expressed support for the proposals. The main material planning considerations raised by the objections were:
- hotel not needed;
  - excessive height;
  - poor quality design;
  - harm to Conservation Area(s);
  - overlooking (of surrounding properties and the pocket park);
  - daylight/ sunlight loss;
  - noise disturbance;
  - wind impact;
  - negative impact on the pocket park;
  - increased traffic, especially along nearby residential side streets; and

- poor developer consultation and unwillingness to amend the scheme in response to objections raised.
5. The mix of uses is considered acceptable taking into account the existing use of the site and having regard to the CAZ, opportunity area and town centre designations. The proposed office floorspace would exceed the existing quantum and be of a superior quality, and the current number of hotel bedrooms within Elephant and Castle is not such that this proposal would result in an overconcentration of visitor accommodation locally. The hotel –to be a mid-range ‘lifestyle’ model combining the personalisation of a boutique hotel with the affordability of a chain hotel– would be interlinked with the restaurant/café unit, providing a public offer albeit limited in scale. Both the restaurant/café and the affordable micro retail unit would bring active frontages to St George’s Road, enlivening this major route into the town centre. For all of these reasons, in land use terms the proposal should be supported.
  6. While the height of the proposal exceeds that of the buildings immediately to the west, the application site marks a point of transition to the much more urban scale of the Major Town Centre. Following careful testing of the building in views, it is considered that the height, scale and massing of the proposed building can be accommodated without undue harm to the established townscape. The detailed architectural resolution brings further refinement to the building form, helping it sit comfortably within its context. Having applied the statutory tests as set out in the Planning (Listed Buildings and Conservation Areas) Act 1990 and the requirements of the NPPF, the public benefits of the scheme outweigh the minor harm to the significance of the Elliott’s Row Conservation Area and the West Square Conservation Area.
  7. With regard to the impact of the proposal on the amenity of surrounding residents, some exceedances of the BRE daylight and sunlight guidance would occur, including 12 substantial adverse VSC reductions and 7 substantial adverse NSL reductions. All but one of these substantial exceedances would be experienced by properties within the Hayles Buildings. The main body of the report details the reasons for the daylight and sunlight impacts, the context within which they would occur and the mitigating factors, concluding that the degree of harm to amenity would not warrant withholding planning permission. In respect of outlook and privacy impacts, although acceptable separation distances between the development and nearby residential windows would be achieved, the applicant has offered to apply an obscuring treatment to the areas of glazing where the window-to-window relationship would be more sensitive, in response to concerns raised by neighbours.
  8. The proposal would maintain a comfortable wind environment within the surrounding streets and the Elliott’s Row Pocket Park without the need for any mitigation. Planning conditions are recommended to control noise and other potential sources of environmental nuisance.
  9. Protective and compensatory measures in respect of Elliott’s Row Pocket Park will be secured through the recommended conditions and Section 106

Agreement. This will include an enhancement fund for the Pocket Park custodians to use for longer-term upkeep and landscaping improvements.

10. A number of transport and highways obligations are proposed to mitigate the impacts of the development, including the construction of a new loading bay on Oswin Street and upgrades to nearby parts of the highway and footway network. The construction logistics and environmental management strategy is considered to be robust, setting out suitable noise, dust and dirt abatement measures alongside appropriate trip consolidation and vehicle routing.
11. As the report explains, the proposal would make efficient use of a prominently-located and under-utilised site to deliver a high quality and sustainable development that accords with the Council's aspirations for the area. In addition to the economic benefits brought by this proposal, such as the new town centre uses and uplift in office space, all of which will generate new jobs, a range of financial contributions will be secured to offset the impacts of the development and assist with local and London-wide infrastructural investment.

## PLANNING SUMMARY TABLES

12.

<b>Housing</b>								
Homes	Private Homes	Private HR	Aff.SR Homes	Aff.SR HR	Aff.Int Homes	Aff.Int HR	Homes Total (% of total )	HR Total
Studio	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
1 bed	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2 bed	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3 bed	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
4 bed +	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

13.

<b>Commercial</b>			
Use class and description	Existing GIA	Proposed GIA	Change +/-
E [a] to (f) (Retail/financial)	582.0		
E [g] i) (Office)	N/A	784.9*	-469.1
E [g] ii) and iii) (Light industrial)	672.0		
B2 (Industrial)	N/A	N/A	N/A
B8 (Storage/Distribution)	N/A	N/A	N/A
E (Affordable workspace)	N/A	71.8	+71.8

C1 (Hotel)	N/A	3523.4	+3523.4
Sui Generis	N/A	N/A	N/A
<b>Employment</b>	<b>Existing no.</b>	<b>Proposed no.</b>	<b>Change +/-</b>
Operational jobs (FTE)	2.5	90 (max)	+87.5 (max)

\* This figure does not include the Class E affordable workspace as that is accounted for as a separate item in the table.

14. **Parks and child play space**

	Existing area	Proposed area	Change +/-
Public Open Space	0	69 sq.m	+69 sq.m
Play Space	0	0	0

15. **Carbon Savings and Trees**

Criterion	Details		
CO2 savings	61% improvement on Part L of Building Regs		
Trees lost	0 x Category B	0 x Category C	0 x Category U
Trees gained	0		

16. **Greening, Drainage and Sustainable Transport Infrastructure**

Criterion	Existing	Proposed	Change +/-
Urban Greening Factor	N/A	0.4	+0.4
Greenfield Run Off Rate	N/A	5.0l/s*	N/A
Green/Brown Roof Coverage	0	165 sq.m	+165 sq.m
Electric Vehicle Charging Points	0	1	+1
Cycle parking spaces	0	36	+36

\* This figure accounts for the +40% rainfall climate change scenario, otherwise it would be 3.6l/s.

17. **CIL and Section 106 (or Unilateral Undertaking)**

Criterion	Total Contribution
CIL (estimated)	£406,716.46
MCIL (estimated)	£189,271.14
Section 106 Contribution	As per the 'Planning Obligations' section of this report

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## BACKGROUND INFORMATION

### Site location and description

18. The application site is a 0.095 hectare trapezium-shaped plot of land, tapering at its southwestern corner, located in the St George's ward. It is bounded:
- to the north by St George's Road;
  - to the east by Oswin Street;
  - to the south by the Metropolis Building (Flats 1-20) on Oswin Street, and;
  - to the west by Elliott's Row Pocket Park and a vehicular access road leading to a parking courtyard.
19. The site is currently occupied by a pair of semi-detached buildings, both of which have a principal façade fronting onto St George's Road. The western building, which pre-dates its neighbour, has a pronounced parapet and a triple-bayed façade organised by pilasters with a crown moulding. The eastern building, constructed in the 1970s/80s, is faced in red brick with simple window openings and little ornamentation to the facades.



*Image 02 (above): Photograph of the existing site, taken from St George's Road.*

20. Due to the raised nature of the ground floor level, the building occupying the western half of the site stands a half-storey taller than its neighbour. Both buildings are set back slightly from the common boundary with the St George's Road footway; a narrow lightwell occupies the intervening strip of space, and is enclosed by a 2-metre high metal railing.
21. Historic internal works to interconnect these two side-by-side buildings have resulted in the property today comprising two self-contained premises: one

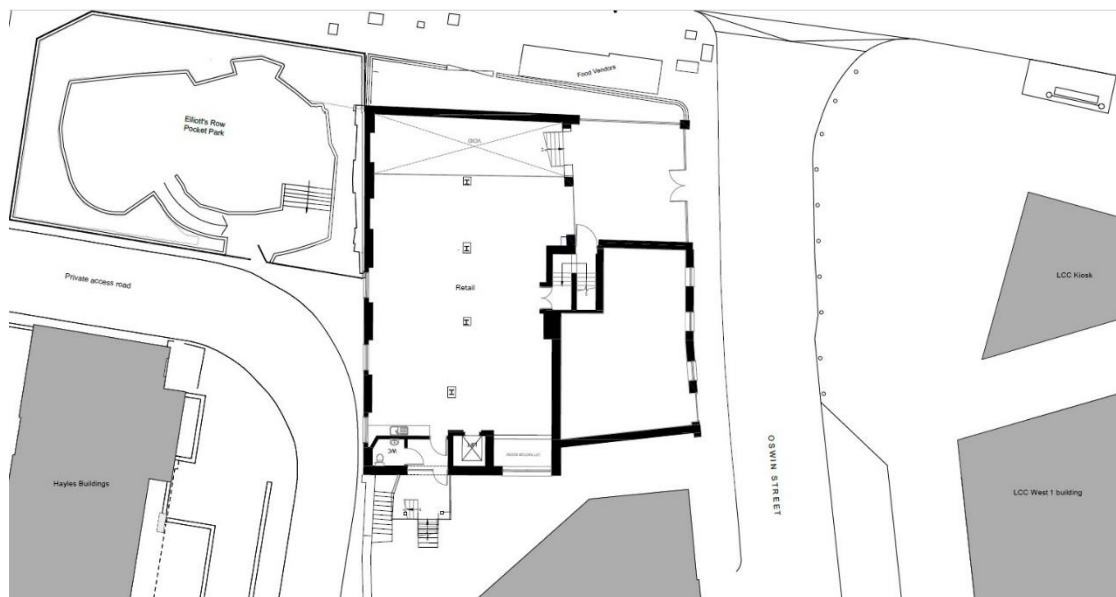
spanning the two upper floors, and the other across the ground and basement levels. In total, the four storeys of accommodation provide 1254 square metres GIA of floorspace. This breaks down as:

- 582 square metres of Class E[c] (professional and financial services) floorspace at ground and basement levels; and
- 672 square metres of Class E[g] (office and light industry) floorspace on the upper two floors.

22. 21 St George's Road is currently partially tenanted. The occupiers are:

- Digital Marketing 24/7 – a small (two person) digital marketing company based in the office area at ground floor, who have occupied the premises since November 2019. The business is on a rolling monthly contract outside of the Landlord and Tenant Act;
- The Bold and Saucy Theatre Company (trading as Bold Elephant) – occupying the space at second floor, the remainder of ground floor and the basement. The occupiers are on a meanwhile lease, which commenced in March 2020.

23. In the southwest corner of the site is a small gated servicing yard, accessed from a narrow driveway off Oswin Street.



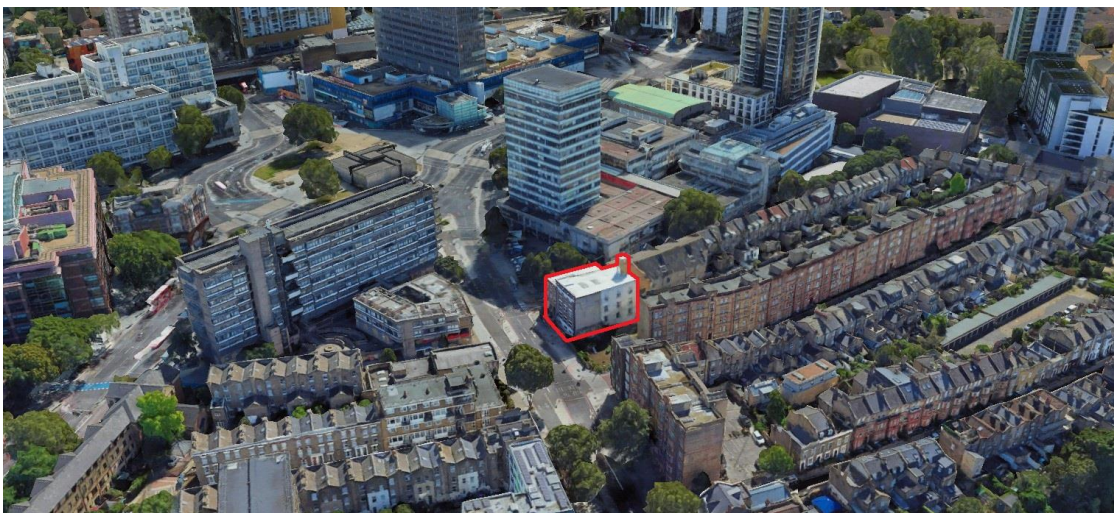
*Image 03 (above): Ground floor plan of the existing 21 St George's Road building in context, with the Elliott's Row Pocket Park visible in the top right-hand corner of the image.*

24. Immediately to the front of the site, on the St George's Road footway, is a 15 square metre retail kiosk and a telephone kiosk. The retail kiosk is outside of Create REIT Ltd's ownership and the planning application red line. The kiosk is leased by an independent local restaurant group, Nandine, which operates the kiosk in two parts, a coffee and snack bar ("Little Nandine") and a small Kurdish food outlet ("Falafel Lover"). Although the retail kiosk stands on TfL footway, its

licence is managed by the Local Highways Authority and the Council's Markets and Street Trading Team. The telephone kiosk is part of BT's estate.

### Surroundings

25. The surroundings vary considerably in terms of land use and building height.
26. The site is located immediately to the west of the commercial centre of Elephant and Castle, which has been home to a number of medium and high-rise buildings since the 1970s. The two nearest existing buildings, which frame the view from the peninsula westwards along St George's Road, are the LCC and Perronet House, which are sixteen and ten storeys tall respectively. Other existing taller buildings a little further away from the site include:
  - Metro Central Heights (a four-block complex, now primarily in residential use), which ranges in height from seven to eighteen storeys;
  - One The Elephant (37 storeys);
  - Highpoint (46 storeys);
  - Strata Tower (43 storeys), and;
  - Two Fifty One (41 storeys).
27. In terms of uses, the existing buildings to the east of the application site include educational, leisure, retail, commercial and residential.
28. To the west of the site, the urban form is of a distinctly more modest scale. Around Elliott's Row, the buildings form a cohesive townscape of 19th and 20th Century two, three- and four-storey terraced dwellings arranged in a tight grid of axial streets – the mansion blocks on Hayles Row are the only buildings to deviate slightly in height, being five storeys at their maximum. North of St George's Road, there is a mix of Georgian terraced properties and low- and medium-rise modernist housing blocks. These are arranged along comparatively wider streets and around large green spaces, giving a more spacious feel. Further to the north is the LSBU Triangle; this incorporates a number of medium-rise purpose-built educational buildings dating from the second half of the twentieth century.



*Image 04 (above): Aerial image of the site (edged in red) dating from 2017, looking eastwards towards the Elephant and Castle Major Town Centre*

29. In terms of land uses, the area to the west of the application site is predominantly residential, although there are some commercial, healthcare and retail uses along St George's Road. Approximately 250 metres to the northwest of the application site is the Imperial War Museum and the public gardens and outdoor sports facilities provided by Geraldine Mary Harmsworth Park. Other nearby open spaces include West Square Gardens and St Mary's Churchyard.
30. The site is located within the Elephant and Castle Opportunity Area, the regeneration of which is guided by Area Vision AV.09 in the Southwark Plan 2022. Critical to realising the vision for the Opportunity Area are two large-scale planning applications, both of which will involve significant intensification and densification of areas of land at the heart of Elephant and Castle. Both of these development areas are within close proximity of the application site, and are detailed below.

#### London College of Communication and Elephant and Castle Shopping Centre

31. In 2019, the Local Planning Authority approved the wholesale re-development of two parcels of land to the east of the application site, bisected by Newington Butts and the peninsula. The parcel west of the peninsula contains the London College of Communication (LCC), while the plot to the east contains the Elephant and Castle Shopping Centre. At the time of this Committee Report, demolition of the shopping centre has taken place and the early stages of construction are underway.
32. The west plot, in its redeveloped form, will comprise a series of medium-rise (8-storey) mansion blocks fronting Oswin Street together with a trio of taller buildings, known as W1, W2 and W3 wrapping around the northern and eastern edges and fronting the peninsula. The consented heights of W1, W2 and W3 are 20 storeys (71.9 metres AOD), 24 storeys (84.7 metres AOD) and 35 storeys (119.8 metres AOD) respectively.
33. W1, located only 10 metres to the east of the application site on the opposite side of Oswin Street, will be given over to retail space at ground floor level. The 19 upper floors will comprise 96 proposed flats, all served by a communal terrace on Level 15 of the building. The tower will be set-back from St George's Road to create a plaza, within which a single-storey retail pavilion (9.35 metres AOD at its maximum point) will be located.
34. The east plot is to be redeveloped as four blocks around a central square. Between them, the blocks will contain four tall buildings, the lowest to be 12 storeys and the highest to be part-27, part-32 storeys. A range of residential, cultural, leisure and educational uses will be delivered, alongside an enlarged and improved underground station.

#### Elephant Park (site of the former Heygate Estate)



35. Further to the east beyond the Shopping Centre is Elephant Park. This mixed use redevelopment, approved by the Local Planning Authority in 2013, comprises a number of buildings ranging in height (the maximum being 104.8 metres AOD), arranged in a masterplan of new avenues and a substantial central green space. As of 2022, the masterplan is entering its final stages of implementation. Once completed, it will have delivered approximately 2,500 homes, 15,000 square metres of retail use, 5,000 square metres of office use and 10,000 square metres of community and leisure use space.
36. Together with the LCC and Shopping Centre site, Elephant Park will transform the character of Elephant and Castle, creating a more integrated, mixed-use, dense, walkable and green neighbourhood.

### Designations

37. The following policy, socioeconomic and environmental designations apply to the application site:
- Central Activities Zone (CAZ);
  - Elephant and Castle Opportunity Area;
  - Elephant and Castle Major Town Centre;
  - “The North West” Multi-Ward Forum Area;
  - Bankside, Borough and Walworth Community Council;
  - Flood Zone 3 (in an area benefitting from flood defences);
  - Air Quality Management Area, and;
  - Community Infrastructure Levy Charging Zone 2;
  - South Bank Strategic Cultural Quarter; and
  - Hot Food Takeaway Exclusion Zone.
38. The site is not within a protected shopping frontage, Business Improvement District or Critical Drainage Area. 21 St George’s Road is not subject to a site allocation in the Southwark Plan.
39. In respect of heritage designations, the application site contains no listed structures, is not within a conservation area and is not within an archaeological priority area. The existing buildings on the site, known together as "Castle Works", are on the draft Southwark Local List of locally listed buildings.
40. The nearest Conservation Area is Elliott’s Row, the boundary of which is at its closest point approximately 5 metres from the application site. In views along St George’s Road (including from the Elephant and Castle peninsula) and Oswin Street, the site and Elliott’s Row Conservation Area can be seen in the same viewframe. Another Conservation Area whose setting is affected by the site is West Square, approximately 100 metres to the west of the application site.
41. Approximately 125 metres to the west of the site is a terrace of Grade II listed properties at nos. 68-83 St George’s Road. The site can be seen in the same context as these twelve listed townhouses, and as such affects their setting.

42. West Square –one of the best Georgian set pieces in the borough, complete with formally laid out central gardens and trees– is located approximately 100 metres to the west of the application site. The Square is flanked by Grade II listed buildings along its eastern, southern and western edges. The application site forms part of the backdrop to the setting of the buildings on the eastern edge of the square.
43. With regard to London Strategic Viewing Corridors, the site is within the Wider Setting Consultation Area of View 23A.1 (Bridge over the Serpentine to Palace of Westminster). The site is not within any of the Borough Views defined by the Southwark Plan.
44. The pocket park immediately to the west of the application site is not subject to an open space designation within the adopted local plan. There are no trees within the site, nor are there any existing trees on the adjacent footways. There are no mature trees within the pocket park.
45. With respect to transport designations, the application site is:
  - within PTAL Zone 6B, meaning it has the highest possible public transport accessibility level;
  - within Controlled Parking Zone C2, operational between 08:00hrs-18:30hrs Monday to Friday;
  - within 10 metres of numerous Permit Holder parking bays (Oswin Street and Elliott’s Row); and
  - within 50 metres of a dedicated Disabled Bay (on Princess Street).
46. The entrance to Elephant and Castle underground station is approximately 100 metres to the east of the site, with the mainline railway station entrance located a further 75 metres beyond. The next two nearest stations offering access to the underground as well as mainline railway services are Waterloo and London Bridge, to the northwest and northeast respectively, both at a distance of approximately 1 kilometre. The Elephant and Castle peninsula is a significant bus interchange, providing various bus services north and west into central London as well as connections east and south into the borough. The pedestrian routes around the application site provide easy access to the bus stops and train stations.
47. Two dedicated cycle lanes exist nearby: Cycle Superhighway 7 on Princess Street and Elliott’s Row, and Cycleway 6 on St George’s Road. Within 100 metres of the site are various banks of Sheffield stands, including one further to the northwest on St George’s Road and six around the Elephant and Castle peninsula. Together, these provide approximately 150 spaces. The nearest TfL/Santander docking station is on St George’s Road, approximately 100 metres from the site, providing 21 docking points.
48. The site is in the safeguarded area of the potential future Bakerloo Line Extension promoted by Transport for London.

## Details of proposal

49. This application seeks full planning permission to demolish the existing commercial (Class E) building and construct in its place a mixed-use building of 15 storeys with a further two storeys of accommodation at basement level. The proposal, which would occupy the majority of the site footprint, is formed of two conjoined masses:

- a 15-storey tower element positioned over the northern two-thirds of the site; and
- a base/plinth block, ranging from 1 to 3 storeys, positioned in-between the proposed tower and the existing 4-storey Metropolis Building.



*Image 05 (above): Isometric of the proposal, illustrating the two masses.*

50. The tower element would at its highest point (top of the plant) stand 50.29 metres above ground level (53.62 metres AOD). The tower's parapet would be one metre below this at 49.29 metres above ground level (52.62 metres AOD). The tower would stand one full storey lower than the shoulder line of the consented W1 tower immediately to the east. The parapet of the base/plinth element would be 11.75 metres above ground level (15.08 metres AOD), broadly in line with the eaves level of the existing adjacent Metropolis Building.

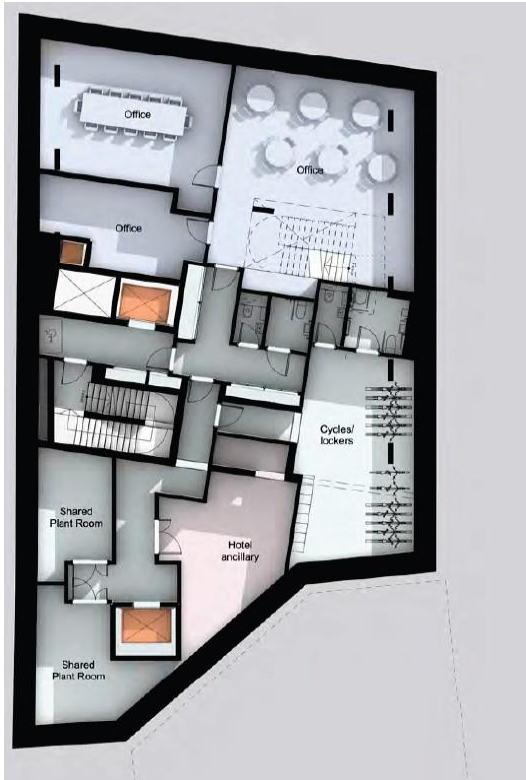
51. The proposed development would occupy the majority of the plot, but would be set back from the St George's Road and Oswin Street footways by a greater distance than the existing frontages to create more generous public realm.

52. The tower element would be chamfered on its four corners and expressed as a 3-storey base, a 10-storey middle and a 2-storey crown. All four elevations would be arranged in bays of consistent width that would extend the full height of the building. The bays within the uppermost two storeys would be concave, creating a concertina building line and giving the top of the building a sculptural twist, counterposing the more ordered and orthogonal elevational arrangement on the lower thirteen floors. A raised parapet, designed to conceal a lift overrun and rooftop plant, would terminate the building. The scheme would incorporate green walls and roofs for aesthetic and sustainable urban drainage purposes.



*Image 06 (above): Visualisation of the lower half of the proposed tower element, as seen looking southwest from the base of Perronet House.*

53. The primary elevational material is proposed to be masonry, with brick piers (in a light grey colour) using 50mm high bricks. Panelling would be in pale GRC. Horizontal elements –such as slab edges, canopies and parapets– would be faced in stone or GRC. Glazing reveals would be faced in Corten.
54. Internally, the proposed building would comprise:
- a 112.9 square metre GIA restaurant/café (Class E) unit;
  - a 20.5 square metre GIA affordable micro retail (Class E) unit;
  - 718.4 square metres GIA of office (Class E) floorspace;
  - a 3,523.4 square metre GIA hotel (Class C1) containing 89 rooms; and
  - associated provision of employee cycle parking, refuse storage, servicing facilities, plant and a circulation core.
55. A detailed floorspace schedule can be found at Appendix 7 of this report.
56. In terms of layout, the lower basement level would be used exclusively for plant, while the upper basement level would be split between office floorspace and some ‘back of house’ storage facilities for the hotel and office. At ground floor level, the floorplan has been arranged broadly into three parts:
- the restaurant/café unit and affordable micro retail unit would occupy the northern part;
  - the hybrid (office/hotel) reception and associated circulation core would be located in the centre of the floorplate with a dedicated entrance from Oswin Street; and
  - the remaining (southern) part of the ground floor would be given over to internal servicing, a substation and refuse storage.



*Image 07 (above): Proposed layout of the upper storey of the basement.*



*Image 08 (above): Proposed layout of the ground floor level.*

57. The first and second floors would be for office use, 10% of which would be designated as affordable workspace with the hotel accommodated on the twelve floors above. The 89 hotel bedrooms would include 10 accessible hotel rooms located at levels 4, 6, 8, 10 and 12.
58. Servicing of all uses would be from a new partly inset 12 metre long layby on the western side of Oswin Street, made possible by a 1.0 metre widening of the carriageway. The existing raised table would need to be shortened to facilitate this, and changes would also be required to the associated loading restrictions on Oswin Street.
59. One managed wheelchair parking space would be provided within a secured enclosed bay, access to which would be from Oswin Street via the existing dropped kerb.
60. Short stay cycle parking would be located on the traffic island on St George's Road, directly opposite the site on the northern side of the cycleway, where a cycle rack containing six cycle spaces is currently located

### **Planning history of the application site and nearby sites**

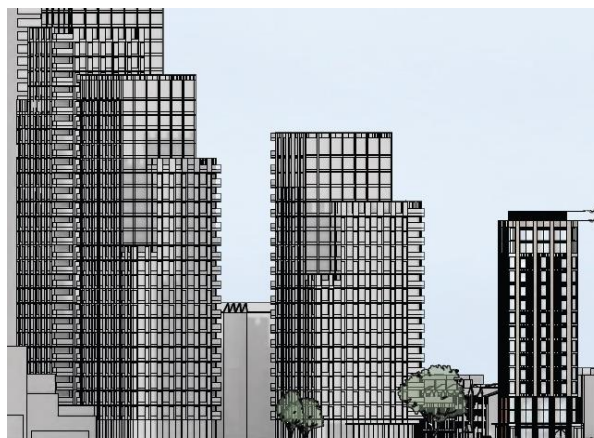
61. Appendix 3 sets out in detail the full planning history for the site as well as details of relevant applications on adjoining or nearby sites.

## Pre-application engagement and mid-application amendments

62. Planning application 21/AP/2838 was submitted following a detailed pre-application enquiry, the reference number for which is 20/EQ/0207. During the course of the pre-application engagement, the applicant made various amendments to the scheme design. The proposal also evolved in response to feedback from the Design Review Panel, more details of which are provided in a later part of this report. At the end of this iterative process, the Council issued a formal response letter. Although the letter was confidential at the time of issue, in accordance with the Council's commitment to ensuring all information relevant in the determination of a planning application is made publicly available, the response letter has been published on the Public Access for Planning Register alongside the 21/AP2838 application documents. The letter should be referred to if any further information is required about the pre-application process.
63. The images below give a sense of the evolution of the design over the course of the pre-application process:



*Image 09 (above): Early iteration of the scheme proposing a 20 storey tower (depicted in yellow).*



*Image 10 (above): Final iteration of the scheme, where the tower element stands to a reduced height of 15 storeys (far right).*



*Image 11 (above): Early iteration of the scheme. The proposed pocket park elevation was heavily glazed on*



*Image 12 (above): Visualisation of the proposed building's pocket park elevation, showing projecting fins,*

*its lower storeys and included apart- green walling and obscured glazing  
hotel balconies on the upper floors. on the lower three floors.*

64. Over the course of the planning application process, the applicant has made further refinements to the proposal in response to concerns raised through the consultation process and/or issues highlighted by officers. These changes include:
- proposing obscuring treatments to some of the windows on the south and west elevations of the building;
  - offering free-of-charge use of the meeting rooms within the proposed office to community groups (at certain times); and
  - commitments to certain planning obligations and other mitigation.
65. The applicant also provided a series of supplementary and revised reports to provide clarifications and corrections with regard to various issues raised by members of the public – this included a revised TVIA and a Pocket Park Construction Interface Report.

## **KEY ISSUES FOR CONSIDERATION**

### **Summary of main issues**

66. The main issues to be considered in respect of this application are:
- Consultation responses from members of the public and local groups;
  - Principle of the proposed development in terms of land use;
  - Environmental impact assessment;
  - Amenity impacts on nearby residential occupiers and surrounding area;
  - Design;
  - Public realm, landscaping and trees;
  - Green infrastructure, ecology and biodiversity;
  - Transport and highways
  - Environmental matters;
  - Energy and sustainability;
  - Digital connectivity infrastructure;
  - Planning obligations and Community Infrastructure Levies;
  - Community engagement and consultation responses; and
  - Community impacts, equalities and human rights.
67. These matters are discussed in detail in the ‘Assessment’ section of this report.

### **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. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers determining planning applications 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.

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.

### **Adopted planning policy**

70. The statutory development plan for the borough comprises the London Plan 2021 and the Southwark Plan 2022. The National Planning Policy Framework 2021 is a material consideration but not part of the statutory development plan. A list of policies which are relevant to this application is provided at Appendix 2. Any policies which are particularly relevant to the consideration of this application are highlighted in the report.

## **ASSESSMENT**

### **Consultation responses from members of the public and local groups**

71. Consultation with members of the public was first conducted in August 2021. Letters were sent to local residents when the application was received, the application was advertised in the local press and site notices were displayed. The table below summarises the number of representations received during this period:

<b><u>Consultation responses: Summary table</u></b>		
No. of representations: <b>170</b>		
Of which:		
In objection: <b>162</b>	Neutral: <b>3</b>	In support: <b>5</b>

72. As mentioned in an earlier part of this report, a number of amendments were made to the application over the course of the determination process. To ensure the public was made aware of the changes, re-consultation was conducted in late April 2022. The table below summarises the number of representations received during this period:

<b><u>Re-consultation responses: Summary table</u></b>
No. of representations: <b>83</b>
Of which:



In objection: <b>82</b>	Neutral: <b>0</b>	In support: <b>1</b>
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73. In total across the consultation and re-consultation period, 239 individuals made representations to the Local Planning Authority about the planning application. Of these 239 individuals, there were 14 who commented as part of the original consultation and then commented again as part of the re-consultation, hence why the total number of representations received comes to 253. Those 14 individuals all objected as part of the original consultation, and maintained their objection when commenting as part of the re-consultation.

### Reasons in objection

74. The following paragraphs summarise the material planning considerations raised in objection by the consultation and re-consultation. The issues raised by these objections are dealt with in the main assessment part of this report. Some objections raised by the public consultation process do not constitute material planning considerations (such as loss of property value); therefore, these are not captured in the following summary paragraphs, nor are they discussed in later parts of this report.

### Amenity Impacts

- 75.
- Will result in loss of daylight and sunlight;
  - Will cause overshadowing (of properties, private amenity spaces and/or the street);
  - Will create overlooking / privacy issues (for properties and the pocket park);
  - Will dominate the pocket park;
  - Will cause adverse microclimate effects;
  - Will cause a loss of general peace and quiet;
  - Will contribute to light pollution;
  - Hotel use, and the potential use of the ground floor retail for a drinking establishment, will create noise and antisocial behaviour;
  - The proposed obscuring treatment of the windows could be easily removed at a later time;
  - The proposed plant does not meet the night time noise requirements.

### Land uses

- 76.
- Hotel not needed;
  - Hotel an inappropriate use for the site;
  - Hotel will bring vice;
  - Hotel will cause an, or add to a pre-existing, overconcentration of hotels locally;
  - The applicant has failed to provide evidence of the demand for a hotel in this location;
  - Hotel will need servicing by vehicles regularly;

- Many other uses would be greatly preferable to a hotel (affordable housing was raised most frequently as an example)
- Office use is at odds with changing working patterns/demand;
- No useful retail is proposed;
- Will result in the loss of an existing cultural space;
- The proposed space (internal and external) at ground level is unappealing;
- The public space offering at ground/street level is inadequate, especially in light of the 'tall building' status of the proposal.

### Economic impacts

- 77.
- Will result in loss of the kiosk (and the local businesses that operate from it) on St George's Road;
  - Inadequate affordable workspace offer;
  - The job opportunities that will come from the proposed uses will be limited and/or will not be meaningful;
  - Longstanding local businesses that currently operate from the site will be forced out;
  - Users of this development will not spend any money locally.

### Design

- 78.
- Poor quality architecture/design;
  - Inappropriate/excessive scale and massing;
  - Harmful to or not in-keeping with the local character ;
  - Inappropriate/excessive height;
  - A tall building in this location would extend the Elephant & Castle central zone beyond its current boundary;
  - Excessive density;
  - Harmful to the setting of nearby designated heritage assets;
  - Contrary to the Elliott's Row Conservation Area Appraisal and the West Square Conservation Area Appraisal;
  - Will harm the local streetscape/streetscene;
  - The existing building has been identified by Southwark as a heritage asset, and of local merit, and thus should be protected;
  - Will affect the Wider Setting Consultation Area of View 23A.1 (Bridge over the Serpentine to Palace of Westminster);
  - Excessively close to surrounding properties.

### Public realm, landscaping and ecology

- 79.
- Will make no substantial improvements to the public realm;
  - Will make no substantial provision of trees and landscaping;
  - Application fails to address the lack of green space in the area;
  - Will make use of the pocket park unappealing, being in the shadow of the proposed building;
  - Will affect the existing planting and landscaping within the pocket park;

- Will cause any new planting and landscaping within the pocket park to fail because of the scale and proximity of the proposed development;
- The green wall proposed on the development's west elevations would be very expensive to maintain;
- Will have a negative effect on the wildlife (driving out birds, insects, squirrels etc.).

### Environmental

- 80.
- Will bring additional traffic post-construction;
  - Will cause additional pollution;
  - Will cause additional noise;
  - Will impact on local urban drainage;
  - Pocket park and/or local streets will experience excessive wind effects and wind tunnelling;
  - The proposed two-storey basement at risk of flooding in the event of a Thames Barrier breach;
  - The accommodation (in particular the hotel accommodation) within the proposed building will be subject to vibration nuisance from the Bakerloo Line Extension, should the Extension be delivered.

### Transport and highways

- 81.
- No mitigation is proposed for the Cycle Superhighway 7 junction on Brook Street;
  - Will endanger cyclists;
  - Will generate an excessive number of taxi trips;
  - Taxis will naturally arrive on Oswin Street via St George's Road, and pull-up on the eastern side of the road, creating highways safety issues;
  - Inappropriate to allow servicing vehicles to the proposal to continue down to Brook Drive and Hayles Street (instead, servicing vehicles should enter and exit Oswin Street via St George's Road only);
  - The application should propose a one way system on Hayles Street to improve passing widths and eliminate the current trend of vehicles mounting pavements;
  - The proposed partly-inset servicing layby on Oswin Street is inadequate (it should be fully inset) and will impact traffic flow;
  - Will create a safety risk for those boarding/alighting buses from the nearby bus stand;
  - Inadequate pedestrian and vehicular access to the proposal;
  - Inadequate parking provision;
  - Inadequate provision for coach pick-up and drop-off;
  - The development should directly fund additional bus services;
  - Due consideration has not been given to the impact of the development on the already overly overloaded passenger ingress and egress at Elephant and Castle underground station;
  - Will create harm, wear and tear to local highway and footway network;
  - Will have road safety impacts.

Construction Phase

- 82.
- Will generate noise and dust;
  - Will generate traffic and associated pollution;
  - Will result in the loss of 15% of the pocket park during construction;
  - Potential health and safety risk from debris falling directly into the playground;
  - Will create health impacts (physical and mental) for local people.

Energy and sustainability

- 83.
- Proposal has an inadequate sustainability performance;
  - The existing buildings should be refurbished not demolished if the Council want to hit net zero targets;
  - The building (in particular its overshadowing effects) will require residents living nearby to use more heating, increasing their bills yet further and burning more fossil fuel;
  - The overshadowing caused by the development will cause damp at existing nearby properties.

Policy conflict

- 84.
- A building of this type/scale is not warranted, as the site is outside the Elephant and Castle Central Character Area;
  - Contrary to local plan and guidance;
  - Will set a precedent for high rise buildings in low rise residential areas;
  - Not compliant with Southwark's and GLA's 'Tall Buildings' policies.

Social infrastructure and community impact

- 85.
- Will increase pressure on local public services (transport, healthcare, education etc.);
  - Will increase pressure on utilities infrastructure (sewerage etc.);
  - Will erode community spirit and togetherness;
  - Will make the local streets and community less safe;
  - Lack of social/community offer.

Developer approach and community engagement

- 86.
- Developer has not attempted to engage with residents who do not possess English as a first language;
  - Developer has been dishonest with, and/or not properly considered, the local community;
  - Developer has failed to meet residents directly impacted by views into bedrooms/ living rooms to discuss privacy mitigations;
  - Developer has not amended the application following concerns raised at previous consultations;

- The scheme has not meaningfully evolved through the course of the pre-application process and/or planning application process in response to concerns raised by members of the public.

#### Inaccuracies and deficits with the application information

- 87.
- Not enough information given in the documents and/or drawings;
  - The daylight and sunlight assessment submitted by the applicant is inaccurate;
  - The acoustic report does not take into account the noise emitted by plant to the rear of the office space at night-time;
  - The application documents, as originally submitted, misled the public and planning officers about the planning guidance and designations relevant to the site;
  - Some of the additional information submitted in Spring 2022 is unsourced and unattributed (such as the wind assessment), bringing into question the validity of their professional advice.

#### Reasons in support

88. Listed below are the material planning considerations raised in support of the planning application by the consultation and re-consultation:
- A hotel is appropriate in this location, bringing jobs and supporting local businesses.
  - Users of the development will spend in the local area, supporting local nearby business;
  - Height is reasonable as it is a step down from neighbouring buildings and/or there are other (existing and consented) nearby tall buildings;
  - The proposed modern design is attractive and in keeping with the area;
  - Objections by other representations to the loss of daylight/sunlight have been overstated.
  - Will add to the attractiveness of Elephant and Castle as a leisure destination.

### **Principle of the proposed development in terms of land use**

#### Relevant policy designations

##### *Overarching strategic policy objectives*

89. The National Planning Policy Framework (NPPF) was updated in 2021. At the heart of the NPPF is a presumption in favour of sustainable development. The framework sets out a number of key principles, including a focus on driving and supporting sustainable economic development. Relevant paragraphs of the NPPF are considered in detail throughout this report. The NPPF also states that permission should be granted for proposals unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.

90. The Good Growth chapter of the London Plan includes GG2 'Making the Best Use of Land' and GG5 'Growing a Good Economy' which are relevant to the proposal. To create successful sustainable mixed-use places that make the best use of land, objective GG2 states that those involved in planning and development must enable the development of brownfield land, particularly in Opportunity Areas and town centres, and prioritise sites which are well connected by public transport. It goes on to require proactively exploring the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. Objective GG5 states that to conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must, among other things, promote the strength and potential of the wider city region, seek to ensure that London's economy diversifies and plan for sufficient employment space in the right locations to support economic development and regeneration.

Central Activities Zone (CAZ)

91. The site is within the CAZ, which covers a number of central London boroughs and is London's geographic, economic, and administrative core. The London Plan recognises the well-established long term demand for office space within the CAZ. Policies SD4 'The Central Activities Zone' and SD5 'Offices and Other Strategic Functions and Residential Development in the CAZ' strongly promote office provision within this policy area. Part B of Policy SD4 states "the nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values".
92. The London Plan also seeks to promote and enhance the CAZ's unique concentration and diversity of cultural, arts, entertainment, night-time economy and tourism functions. Policy E10 of the Plan sets out in detail how proposals for visitor accommodation with the CAZ should be assessed by local planning authorities.
93. With regard to retail uses, the London Plan designates Elephant and Castle as one of the CAZ retail clusters, where retail expansion and diversification is to be supported in the interests of delivering "approximately 375,000 square metres of additional comparison goods retail floorspace over the period 2016-2041" across the CAZ.

Elephant and Castle Opportunity Area

94. The site is within the Elephant and Castle Opportunity Area, one of twelve in central London. The London Plan sets out an indicative capacity of 5,000 homes and 10,000 jobs for this Opportunity Area over the twenty years to 2041. London Plan Policy SD1 'Opportunity Areas' requires boroughs through their

development plans and decisions to support development which creates employment opportunities and housing choice for Londoners, plan for and provide the necessary social and other infrastructure to sustain growth and create mixed and inclusive communities. The London Plan specifically recognises the value of the proposed Bakerloo Line extension from Elephant and Castle to Lewisham and beyond, which would increase the connectivity and resilience of the area while also reducing journey times to key destinations.

### Elephant and Castle Major Town Centre

95. The site is also within the Elephant and Castle Major Town Centre, where London Plan Policy SD6 'Town Centres and High Streets' encourages development to, amongst other things:
- promote the vitality and viability of town centres;
  - maintain the role of town centres as the primary locations for commercial activity beyond the CAZ;
  - deliver tourist infrastructure, attractions and hotels;
  - enhance the vitality of the area through the provision of vibrant and well-managed daytime, evening and night-time activities;
  - redevelop and intensify identified surplus office space for other uses including housing, taking into account the need for affordable and suitable business premises.
96. The key policy at the local level is Southwark Plan Policy P35 'Town and Local Centres'. This sets out that, amongst other things, development must:
- ensure main town centre uses including markets, community, civic, leisure and cultural uses are located in town centres and local centres; and
  - be of a scale and nature that is appropriate to the role and catchment of the centre; and
  - retain retail floorspace or replace retail floorspace with an alternative use that provides a service to the general public, and would not harm the vitality and viability of the centre; and
  - not harm the amenity of surrounding occupiers or result in a concentration of uses that harms the vitality, viability and economic growth of the centre; and
  - provide an active use at ground floor in locations with high footfall.

### Elephant and Castle Area Vision

97. The site is located within AV.09, the Elephant and Castle Area Vision. In this location, development is expected to:
- support the area's function as a major town centre for all Southwark residents and a central London location that attracts global business, research, teaching, shopping, flexible business spaces and cultural activities;

- provide as many homes as possible at a range of different tenures including social housing;
- provide opportunities for existing small businesses, particularly those from minority ethnic groups, to relocate and continue trading;
- support the creation of a distinctive environment through a mix of innovative and enduring new architecture, heritage buildings, open spaces and quality public realm that provides greenery, safety, connectivity and reduces exposure to air pollution;
- improve the train and underground stations, provide step-free access, provide a new ticket hall for the Northern Line and Bakerloo Line extension and enable new transport infrastructure links with the surrounding areas by providing safe and accessible walking, cycling and public transport routes.

### Conclusion on policy designations

98. The principle of a development containing a mix of uses including Class E office space, Class E restaurant/café, Class E affordable retail and Class C1 hotel would support the role and functioning of the CAZ and the Elephant and Castle Major Town Centre as well as being consistent with the policies for the Opportunity Area. The acceptability of each use is considered below.

### Hotel floorspace

#### Policy background

99. London Plan Policy SD4 states that the attractiveness and inclusiveness of the CAZ to visitors should be enhanced. London Plan Policy SD5 states that the strategic functions of the CAZ, which include the provision of tourism facilities such as hotels and business/institutional uses, should be given equal weight to residential use in Elephant and Castle.
100. Policy E10 of the London Plan supports new hotel uses in town centres within inner London, provided they are well-connected by public transport, particularly to central London. Working Paper 88 'Projections of demand and supply for visitor accommodation in London to 2050' (April 2017), upon which Policy E10 is based, forecasts that London will require 58,000 new serviced bedrooms by 2041, to be directed towards the CAZ and town centres. This figure is informed by an estimate that 1,795 of the rooms will be required in Southwark.
101. With regard specifically to the location of hotels, Policy E10 states "within the CAZ, strategically-important serviced accommodation should be promoted in Opportunity Areas, with smaller-scale provision in other parts of the CAZ except wholly residential streets or predominantly residential neighbourhoods, and subject to the impact on office space and other strategic functions".
102. Policy P41 of the Southwark Plan 2022 sets out various criteria new visitor accommodation must achieve. These include being of a design and function that responds positively to local character, and protecting the amenity of the local community and visitors to the hotel. The policy requires at least 10% of



the hotel floorspace to be given over to publicly accessible daytime uses that offer employment opportunities.

### Assessment

103. The planning application proposes an 89-bedroom hotel, with a reception area at ground floor level and the bedrooms arranged over levels 3 to 14. The hotel would be co-located with a restaurant/café unit and office floorspace, the latter containing meeting rooms that would be available at certain times for community use. Although there is no committed operator as yet, the application documents indicate the hotel has been designed as a mid-range 'lifestyle' model; the 'lifestyle' typology combines the personalisation of a boutique hotel with the affordability of a chain hotel.
104. Occupying a position close to the heart of the Elephant and Castle Major Town Centre and within walking distance of the Elephant and Castle underground and mainline stations as well as numerous bus stops, the site has a public transport accessibility level of 6b (the best possible accessibility level). Therefore, the location meets the London and borough-level requirements for high public transport accessibility.
105. Notwithstanding that a hotel on this site may be appropriately located, the requirement for the proposal to not result in an over-dominance of visitor accommodation must be considered. An over-concentration of hotels can detract from the vitality of the place, reduce the opportunity for a range of other services to be provided, and increase the transient population in an area. This can manifest itself in harm to the character and successful functioning of an area and can undermine the stability of a community.
106. Some objections to 22/AP/2838 contend that the proposed hotel would result in an over-concentration of visitor accommodation locally.
107. The table below provides a summary of the existing and pipeline hotel rooms within a 750 metre radius of the application site. This covers a wide area encompassing the northern two-thirds of the Elephant and Castle Opportunity Area, spanning as far as the southern cusp of Waterloo, the northern end of Kennington and Walworth Road, and the western end of New Kent Road. Hotel rooms currently under construction have been treated as 'existing' rather than 'pipeline' because there can be a high degree of certainty about these rooms' imminent delivery. The full dataset upon which the table has been compiled can be found in Appendix 8 to this report:

<b>Existing and pipeline hotel rooms in the local area</b>		
<b><u>Distance from site</u></b>	<b><u>Existing</u></b>	<b><u>Pipeline</u></b>
Within a 250 metre radius	0	0
Within a 251 – 500 metre radius	458 (34.3%)	0
Within a 501 – 750 metre radius	877 (65.7%)	550 (100%)

Total	<u>1335</u> (100%)	<u>550</u> (100%)
Of these totals, the accommodation format/type breaks down as:		
Hostel	167 (12.5%)	0
Budget	674 (50.5%)	0
Mid-range	317 (23.7%)	550 (100%)
High end	177 (13.3%)	0

108. As the table shows, of the existing local hotel rooms, there are none within the immediate vicinity of the site (250 metres or closer) and the majority (65.7%) are located at least 0.5 kilometres away. This pattern is reflected in the hotel room pipeline: all consented hotel rooms are on sites located more than 0.5 kilometres away. As the table shows, budget formats are the predominant type of existing hotel room but the pipeline of rooms will enhance Elephant and Castle's mid-range offer.
109. The number of existing visitor bedrooms in and around Elephant and Castle is considered to be modest, taking into account its Major Town Centre, CAZ and Opportunity Area designations. Furthermore, given that the surrounding land uses remain very mixed and include retail, residential, educational, cultural, medical and commercial, the proposed 89 rooms together with the 1335 existing rooms would not create a dominance of visitor accommodation in this location to the point where it would prevent other uses from functioning successfully.
110. The same would remain true even if the 550 consented rooms come forward, as this would bring the total number of rooms to 1885, which is not disproportionate for a Major Town Centre.
111. Being a mid-range 'lifestyle' model, the proposed hotel will help rebalance the mix of accommodation typologies in Elephant and Castle, which at present is heavily weighted in favour of budget formats.
112. Furthermore, because the hotel would predominantly occupy floors 3 to 14 of the proposed building, with town centre uses to be provided on the base three floors in place of the existing three-storey commercial building, the introduction of the hotel would not in itself displace any existing uses.
113. With regard to the Southwark Plan expectation that 10% of new hotel floorspace be dedicated to one or more publicly accessible daytime uses, the proposed development incorporates a publicly accessible restaurant/café unit of 112.9 square metres. Although this represents 3.2% of the total hotel floor area, thereby falling short of the 10% requirement, the hotel would form part of a larger mixed-use development providing an affordable micro retail unit and offices, as well as rooms within the latter available for free-of-charge use by the general public at certain times. As such, it is considered that the proposal as a whole meets the aims of this policy.

114. For the reasons given above, and taking account of the weight of support London Plan Policy E10 gives to visitor accommodation in town centres, the proposed hotel use is considered acceptable in principle. The hotel would add to the vitality and vibrancy of the major town centre, support the local economy and offer accommodation for the growing number of visitors to the local area, many of whom are connected to Elephant and Castle's expanding higher education and offices uses. It would therefore conform not just with Policy E10 of the London Plan 2021 but also with the Plan's broader economic development objectives as set out in Policies SD6, SD8, SD9, E1 and E9. As expanded on in subsequent parts of this report, the hotel would be of a design and function that responds positively to local character, while also protecting the amenity of the local community and visitors to the hotel, and as such is in accordance with the Southwark Plan.
115. The hotel would create approximately 30 direct FTE jobs. A proportion of these will be secured in the Section 106 Agreement for local people.

#### Wheelchair rooms

116. Policy E10 of the London Plan requires serviced accommodation to provide either:
- 10% of new bedrooms to 'wheelchair accessible' standards (whereby the en-suite facility must be either a shower room with corner WC for independent use or a bathroom with a ceiling-mounted tracked hoist system); or
  - 15% of new bedrooms to 'accessible standards' standards (whereby the en-suite facility must meet the requirements for people with ambulant mobility impairments, and be capable spatially and structurally of future adaptation to 'wheelchair accessible' standards).
117. The planning application proposes that 10 (11.2%) of the rooms would be 'wheelchair accessible'. These are to be distributed across the levels 4, 6, 8, 10 and 12 of the hotel. This provision would meet the requirements of London Plan Policy E10 and is therefore acceptable. A condition is to be imposed requiring the 10 accessible rooms to be fitted out from first occupation and retained as such for as long as the building is in hotel use.

#### Demand and viability

118. From the premise that there is no demand for hotel accommodation in Elephant and Castle, a number of public objections contend that the proposed hotel would not be a viable use. While hotel demand is not technically a planning consideration, it is recognised that an unviable use could lead to a failure to lease the premises or significant room under-occupancy; both scenarios would militate against wider social and economic policy objectives.
119. Although Southwark as a whole has a large number of existing and consented hotel rooms, these are mainly concentrated around Bankside, Borough and

Blackfriars. South of these areas there are comparatively lower levels of visitor accommodation. With the redevelopment of Elephant and Castle, it is also anticipated that demand for overnight accommodation in the area will continue to grow. The applicant has submitted a report prepared by Savills, which sets out the marketing process the applicant has undertaken and demonstrates the substantial interest in the site from a number of hotel operators. The report indicates the undersupply of hotel accommodation in Elephant and Castle has made the proposal an attractive proposition.

120. As such, there is no compelling evidence to conclude that the proposed hotel would be unviable.

## Office floorspace

### Policy background

121. Promoting the economy and creating employment opportunities is a key priority for the planning system. Owing to the site's location within an Opportunity Area and a Major Town Centre, London Plan Policies SD1 and SD6 (both of which have been discussed in earlier parts of this report) are relevant considerations. London Plan Policy GG5 requires local planning authorities to plan for sufficient employment and industrial spaces to support economic growth. Policies E1 and E2 deal specifically with the provision of business floorspace (Class E[g] use, formerly Class B use), with a focus on securing good quality, flexible and adaptable office space at varying sizes within the CAZ, alongside increases to the overall quantum of available office stock. London Plan Policy E11 requires development proposals to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases.
122. In order to support the vibrancy and vitality of the CAZ, London Plan policies SD4 and SD5 promote mixed use development, including housing, alongside increases in office floorspace. Policy SD5 is clear, however, that new residential development should not compromise the strategic functions of the CAZ. The Mayor's Central Activities Zone SPG contains additional guidance on maintaining an appropriate mix of uses within the CAZ, setting out the weight that should be afforded to office use and CAZ strategic functions relative to residential.
123. At the borough level, a strategic target of the Southwark Plan is to build a strong, green and inclusive economy. To achieve this, Policy SP4 aims to bring forward at least 460,000 square metres of new office space between 2019 and 2036 (equating to around 35,500 jobs). The policy states that around 80% of new offices will be delivered in the CAZ and sets a strategic target of 20,000 new jobs for the Elephant and Castle Opportunity Area. The policy also expects 10% all new employment floorspace to be affordable workspace for start-ups and small and independent businesses.
124. Policy P30 of the Southwark Plan identifies sites within the CAZ, Opportunity Areas and town centres as appropriate for accommodating the significant

growth needed to meet business demand. This policy requires development proposals at the very least to maintain, but where possible increase, existing levels of business floor space. Applications proposing employment floorspace should be supported by a marketing strategy to demonstrate how the facilities would meet current market demand. Proposals should also bring forward a mix of other complimentary uses as well as residential to enhance the offer, vitality and long term vibrancy of central London.

### Assessment

125. This planning application proposes to deliver a net increase in office floor space in a rationalised and higher quality format, with affordable workspace forming part of the offer. This is entirely appropriate for this central London location and is supported by the aforementioned policies. It is therefore welcome in principle.
126. The existing building contains approximately 672 square metres of office floorspace and currently supports approximately 2.5 full time equivalent (FTE) jobs; prior to Specsavers vacating the premises in Spring 2022, it is understood the site supported approximately 25.5 FTE positions. Due to the building's poor condition, in its current state it is unlikely to attract new tenants. The proposed development would provide 718.4 square metres GIA of Class E[g] office floorspace, supporting up to 90 FTE jobs. This represents an uplift in office employment floorspace of approximately 46.4 square metres and an increase in the number of jobs by a maximum of 64.5 full time equivalent (FTE) positions. This increase in employment floorspace and job provision would satisfy the aims of the London Plan and the Southwark Plan in creating new jobs and high quality office space within the CAZ, the Elephant and Castle Opportunity Area and the Elephant and Castle Major Town Centre.
127. Policy P31 of the Southwark Plan states that employment uses (Class E[g]) "will be secured and where necessary, retained through the implementation of conditions and/or planning obligations in accordance with the tests set out in national policy". Given that the policy framework expects no less than the existing quantum of office floorspace on this site to be re-provided by any redevelopment, it is considered necessary to apply a condition to 21/AP/2838 preventing any change of use from office to occur without express planning permission having first been granted by the Local Planning Authority.
128. The policy requirements to provide skills and employment plans for the offices within the scheme at 10% of the estimated FTE employment on site would be secured through a planning obligation.
129. A number of objections to this planning application from members of the public referred to the Covid-19 pandemic removing or reducing the demand for office space in London, such that the office element of this proposed development is not needed. The development plan policies have not been amended or removed to respond to any long-term changes in working practices that may come out from the pandemic, and so remain as published and adopted for the consideration of this planning application. The Local Planning Authority must determine the submitted application presented in this report, in accordance with

the currently adopted local plan policies unless material considerations indicate otherwise.

130. The applicant has supplied a marketing strategy to demonstrate that there is demand for the proposed office space, in accordance with the requirements of Southwark Plan Policy P30 'Office and Business Development'. The report sets out that the predicted lack of supply of quality Grade A office buildings being delivered post 2024 will ensure that the proposed development will provide attractive high quality business floorspace in a central London location. It anticipates that there will be a large variety of occupiers wanting to upgrade from current secondary office stock, and that these occupiers will be attracted to the surrounding educational institutions, London College of Communications and LSBU. The health sector is also strongly represented locally, with excellent links to Guys, St Thomas's and Kings Hospitals.
131. The basement-level meeting rooms within the proposed offices would be bookable by the community free-of-charge outside of normal working hours. Policy S1 of the London Plan 2021 promotes the delivery of high quality, inclusive and accessible new social infrastructure. Policy P35 of the Southwark Plan seeks to "ensure the provision of main town centre uses including markets, community, civic, leisure and cultural uses are located in town centres and local centres", while Policy P47 welcomes the delivery of new community facilities provided they are available for all members of the community. The opportunity for the community to make use of the proposed meeting rooms is, therefore, acceptable in principle. Notwithstanding, in light of the rooms' limited size and hours of availability, this community use would not be given significant weight in determining the application.

### Affordable workspace

132. Policy E2 of the London Plan requires large-scale development proposals to incorporate flexible workspace suitable for micro, small and medium sized enterprises. Policy E3 deals specifically with affordable workspace. The policy states "In defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose". The policy identifies the circumstances in which it would be appropriate to secure affordable space. Part B of the policy specifically identifies the CAZ as an important location for securing low cost space for micro, small and medium sized enterprises.
133. Policy P31 of the Southwark Plan deals with affordable workspace. Criterion 2 of the policy requires major development proposals to deliver at least 10% of the gross new employment floorspace as affordable workspace on site at a discounted market rent for a period of at least 30 years. The policy recognises that there are many different forms that such space could take depending on the site location, characteristics, the nature of local demand and existing/proposed uses.

134. The total quantum of proposed market and affordable office floorspace within the development is 718.4 square metres GIA, an uplift of 46 square metres on the existing quantum of 672 square metres. Under the terms of Policy P30, a minimum of 10% of the office floorspace within the proposed development should be dedicated as 'affordable workspace'. In this instance, this equates to at least 71.8 square metres of dedicated affordable workspace.
135. The applicant has not confirmed exactly how the affordable workspace would be provided within the proposed offices, preferring at this stage to leave open the option to separate-off some of the floorspace into a standalone unit or provide it as desk space interspersed with the market rate facilities. Deferring these details to the post-decision Management Plan stage will allow an operator to be involved in the process of designating the affordable workspace location.
136. The Section 106 Agreement will include a dedicated 'affordable workspace' schedule. This will ensure, among other things, that:
- the workspace is provided for a 30-year period at a peppercorn rent for months 0-11, and then from 12 months until the end of the affordable workspace lifetime at no more than 75% Local Open Market Rent for equivalent space;
  - no more than 50% of the market rate office floorspace can be occupied until the affordable workspace has been fitted-out to the agreed specification ready for occupation;
  - a Full Management Plan and a Full Marketing Strategy (which will confirm the exact location and format of the affordable workspace), both of which will be secured in advance of the marketing period and first operation of the workspace;
  - the service charges payable by the tenant will be capped;
  - the rates payable by the tenant will be capped;
  - the operator is bound to a process of ongoing reporting over the course of the affordable workspace lifetime.

## Retail floorspace

### Policy background

137. The site lies in a popular area for retail and restaurant/café operators, being located close to the centre of Elephant and Castle with a frontage onto the busy thoroughfare of St George's Road. At present, the site contains 582 square metres of Class E[c] (financial and professional services) floorspace, which qualifies as 'retail' use.
138. Policy SD4 of the London Plan sets out a strategic priority to support the vitality, viability, adaption and diversification of Elephant and Castle, as a CAZ Retail Cluster, through retail and related uses. London Plan Policies E9 and SD7 provide support for, and do not permit loss of, essential convenience retail and specialist shopping in Major Town Centres. Policy SD7 requires development proposals in town centres to deliver commercial floorspace appropriate to the size and role of the town centre.

139. At the local level, Policy SP4 of the Southwark Plan identifies the Elephant and Castle Major Town Centre as appropriate for delivering approximately 10,000 square metres of retail floorspace. Policy P32 of the Plan requires development proposals to provide affordable and suitable space for existing occupiers in the completed development.
140. In order to secure a diversity of traders and small businesses within town centres, Southwark Plan Policy P35 requires development proposals to:
- retain retail floorspace; or
  - replace retail floorspace with an alternative use that provides a service to the general public and would not harm the vitality and viability of the centre.
141. In the CAZ, Opportunity Areas and town centres, Policy P35 requires any proposed retail uses to be conditioned so as to restrict change of use within Class E. Retail uses are defined as those falling within Classes E[a], E[b] and E[c] – which encompasses shops, post offices, cafés, restaurants, banks, building societies, professional services, estate agents and employment agencies.

### Assessment

142. This planning application proposes a restaurant/café unit at ground floor level with glazed frontages onto St George's Road and Oswin Street. The proposed unit would serve visiting members of the public as well as potentially providing an optional breakfast service to hotel guests. It would have a floor area of 112.9 square metres GIA. Given that the existing retail use on the site has a floor area of 582.0 square metres GIA, this represents a net reduction of 469.1 square metres.



*Image 13 (above): Visualisation of the restaurant/café unit.*

143. The application site is of a modest footprint. To deliver an appropriately mixed-use redevelopment, it is inevitable that a reasonable proportion of the ground floor level will need to be reserved for servicing, circulation and ancillary facilities. Weight must also be given to the new hotel use, which would contribute towards the vitality and vibrancy of the town centre, together with the proposed uplift of office space. As such, while the proposed restaurant/café unit would be of a smaller floor area than the existing on-site quantum of retail floorspace, it would nevertheless provide modern and fit-for-purpose premises



that would support the retail/restaurant offer across the wider town centre. Additionally, the unit would improve activation along St George's Road and Oswin Street by providing a wrap-around glazed frontage. By contrast, the frontage of the existing building is separated from the St George's Road footway by a lightwell and partly obscured by the kiosk, and as such the proposed restaurant/café unit would greatly enhance the relationship between the site and the public realm. In summary, the proposed restaurant/café use accords with development plan policies and aspirations for the area, and on balance the net reduction in retail floorspace is acceptable.

144. In accordance with Policy P35, the proposed restaurant/café unit will, through the use of a planning condition, be limited to Class E[a], E[b] or E[c] uses only; this will remove the right to change the use of the unit to sub-categories [d], [e], [f] or [g] as would otherwise be possible under Permitted Development Rights. This will afford the owner a degree of flexibility in the event that the intended restaurant/café function is deemed unfeasible, while ensuring the use of the unit continues to provide a public service and active frontage.

## Business relocation

### Policy background

145. Where a proposed development may displace existing small or independent businesses, Policy P33 of the Southwark Plan requires the application to be accompanied by a Business Relocation Strategy. This must explain how the existing businesses will be supported through the course of the redevelopment and provide evidence that that the relocation option is suitable for the viable continuation of the businesses.
146. Where existing businesses are proposed to be relocated the strategy should, amongst other things, include:
- reasons why existing businesses cannot be located on site; and
  - details of relocation options explored with individual businesses, the assistance that will be provided, and evidence that the relocation option is suitable for the viable continuation of the business; and
  - identification of alternative premises in Southwark; and
  - collaboration with other landowners to establish whether suitable workspace for existing businesses could be accommodated in different phases of the development programmes.
147. Where existing businesses are to be accommodated in new development the strategy should include:
- specific business requirements including servicing, fit out and ownership or lease terms; and
  - temporary relocation arrangements (on site or as close to the original site as possible) or scheme phasing to allow the continuation of the business during construction; and

- options for temporary relocation should consider the cost and practical arrangements for businesses where multiple moves may not be feasible

#### Assessment – existing businesses within the site

148. There are two businesses operating from the existing building, 'Digital Marketing 24/7' and the 'Bold and Saucy Theatre Company'.
149. A public representation about the planning application asserted that the redevelopment would result in the loss of an existing cultural space. It is assumed this comment is referring to the activities of the 'Bold and Saucy Theatre Company'. The theatre company is not a longstanding tenant of the site, having taken up a meanwhile lease connected fully with the proposed redevelopment of the site – when they moved in, the planning process was underway and they were fully aware of this. While the relocation of the theatre company has not yet been resolved, dialogue is ongoing with the Central School of Speech and Drama about taking up residency in their facilities. 'Bold and Saucy' is not a cultural venue or use, being a business use (Class E[g]), and as such does not benefit from the protections of Policy P46 of the Southwark Plan.
150. Similarly to 'Bold and Saucy', 'Digital Marketing 24/7' expressly entered the building with the expectation of redevelopment, having taken up a flexible lease with regular break clauses. When 'Digital Marketing 24/7' decides to relocate, there are a range of options in the local area for comparable quality office/desk space at similar rents.
151. In summary, neither of the two existing occupiers have had a long-term presence on the site, both having taken advantage of low cost meanwhile space that otherwise would have been left vacant. The applicant's business relocation strategy states these businesses "do not require assistance [but] Create REIT will continue to keep them abreast of timings to allow them to identify alternative facilities in good time". For these reasons, it is considered that the applicant has met the requirements of Policy P33 of the Southwark Plan.
152. Up until March 2022, Specsavers Optical Superstores occupied the top floor of 21 St George's Road. As Specsavers is not an SME, it does not benefit from any policy protection. In any case, Specsavers devised its own business relocation strategy and implemented this upon the expiry of its lease in March 2022. Since Specsavers vacated, the premises have remained empty.

#### Assessment – existing businesses adjacent to the site

153. This planning application proposes an affordable micro retail unit with its own discrete access and back-of-house space including a WC. The micro unit would be demised and function entirely separately from the restaurant/café unit. Occupying a portion of the St George's Road frontage, the 20.5 square metre unit would have a serving hatch fronting directly onto the public realm at which customers would place and receive their orders.



*Image 14 (above): Photograph of the existing Nandine-operated kiosk to the front of the site.*



*Image 15 (above): Sketch of the proposed integral affordable micro unit (with illustrative tenant fascia signage).*

154. The unit will be offered to Nandine (the operator of the existing kiosk to the front of the site) on a first refusal basis on the same terms as its existing Southwark Council leased unit. Should Nandine not wish to lease the micro retail unit, it would be offered to an alternative qualifying occupier on exactly the same affordable terms. The on-site provision of this micro retail unit avoids the need to extinguish the street trading pitch, in turn avoiding any net reduction in the number of pitches in Elephant and Castle, where current demand significantly outstrips supply. The provision of the micro retail unit would also avoid the displacement of an existing local SME. These efforts to retain and re-accommodate the existing small business within new high-quality premises at a rental level equivalent to local trading pitch rates accords with the business retention expectations of Southwark Plan Policy P33, and as such is welcome.
155. It should be noted that the office component of the proposed development fully satisfies the policy requirement for 10% of the employment floorspace to be provided at affordable rents (as detailed in a preceding part of this report). As such, the proposed affordable micro retail unit is additional to (not part of) the developer's 10% affordable commercial space offer. In light of this, and given that neither the Southwark Plan nor London Plan are prescriptive about the minimum duration of affordable retail space, the offer from the developer to provide the micro unit on affordable lease terms for a minimum period of ten years is considered acceptable. This will give the tenant an adequate period time to grow their business, in accordance with the spirit of Policies P31, P32 and P33.
156. During the construction phase of the development, the applicant considers it feasible for the existing kiosk to continue operating from its current location on the St George's Road footway. As there is no absolute certainty of this, the Section 106 Agreement will include fall-back obligations to mitigate the impact to Nandine should it ultimately be necessary for their current operation from the kiosk need to cease during the construction period (this mitigation will apply irrespective of whether Nandine opts to occupy the micro retail unit within the building).

157. Further details about the agreed heads of terms can be found in the ‘Planning obligations and Community Infrastructure Levies’ part of this report. This includes the separate need to address the impact of the loss of the pitch on the income of the Southwark Street Traders and Markets Team including its ongoing agreement with Nandine.
158. Policy P32 of the Southwark Plan allows conditions to be applied to any proposed small shops to prevent future changes of use within Class E. A small shop is defined as being less than 80 square metres GIA, and as such the proposed affordable micro retail unit falls within this definition. It is considered appropriate to restrict the micro retail unit to Class E[a] and [b] uses for the following reasons:
- the proposed development would reduce the on-site retail floorspace, and as such it is important to ensure any reprovided retail space on the site is safeguarded to avoid further erosion of this land use;
  - the proposed micro unit has been purposely designed to serve customers from the street and thus should be limited to conventional retail and ‘street food’ functions – this will ensure the unit activates the street in the intended way, something that Class E[c] to [g] uses would be very unlikely to achieve.
159. The site is within the Hot Food Takeaway Exclusion Zone. Hot food (falafels, wraps, burgers etc.) are a key part of the business model of the current kiosk operator, Nandine. The potential occupation of the micro retail unit by Nandine therefore engages the Southwark Plan hot food takeaway policy, Policy P48. Were hot food takeaway uses not be permitted at the micro retail unit, it would in all probability dissuade Nandine from taking up tenancy – which would run counter to the spirit of business retention policies. To avoid this, it is recommended that the use of the micro retail unit for hot food takeaway purposes be permitted throughout the duration of Nandine’s occupancy (i.e. the permitted uses of the unit would be Class E[a], Class E[b] and Class Sui Generis [r]). In the event that the lease is taken up by any business other than Nandine, only Class E[a] and Class E[b] retail uses would be permitted, which would essentially permit any food retailer to sell cold food and hot drinks but not hot food. This personalised hot food takeaway use class allowance for Nandine will be secured through the Section 106 Agreement.

### Non-provision of housing

160. It is recognised that the proposal would not incorporate any housing, and that some representations from members of the public have objected to the proposal on these grounds. However, the footprint of the site limits its ability to accommodate the reprovided commercial floorspace alongside residential uses and their attendant amenity requirements. Therefore, in this instance and having regard to weight of support Policy SD5 of the London Plan and the Mayor’s CAZ SPD give to office uses in this location, the non-provision of housing is considered acceptable. In conclusion, and given that in land use terms the proposed hotel and retail units are acceptable in this location, non-provision of

housing is not a justifiable reason for refusing permission for the proposed development.

### Conclusion on uses

161. Each of the proposed land uses are appropriate in policy terms for this site within the CAZ, Elephant and Castle Opportunity Area and town centre. The uplift and improvement in office floorspace and the provision of a new mid-range hotel are considered to be major benefits of the scheme, facilitating the growth of Elephant and Castle's employment and tourism offer. The proposed restaurant/café unit would replace existing retail floorspace, albeit in a smaller quantum, and maintain an active frontage in this high footfall location, thereby supporting the vitality and viability of the Major Town Centre. Given the wide range of uses spanned by Class E, it is appropriate to limit by way of a planning condition:
- the restaurant/café use to Class E[a], [b] and [c] only (retail, dining and professional/financial services);
  - the micro retail unit to Class E[a] and [b] only (retail and dining), with a separate planning obligation allowing Sui Generis takeaway use in the event of Nandine taking up occupancy of the unit; and
  - the office to Class E[g] only.
162. To ensure compliance with the economy-focussed policies of the London and Southwark Plans, planning obligations are recommended to secure the affordable workspace, affordable micro retail unit, and the end use jobs and training.

### **Environmental impact assessment**

163. Environmental Impact Assessment is a process reserved for the types of development that by virtue of their scale or nature have the potential to generate significant environmental effects.
164. The Council was not requested to issue a screening opinion as to whether the proposed development, due to its proposed size and scale, would necessitate an Environmental Impact Assessment (EIA).
165. The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 set out the circumstances in which development must be underpinned by an EIA. Schedule 1 of the Regulations sets out a range of development, predominantly involving industrial operations, for which an EIA is mandatory. Schedule 2 lists a range of development types for which an EIA might be required due to the potential for significant environmental impacts to arise. Schedule 3 sets out that the significance of any impact should include consideration of the characteristics of the development, the environmental sensitivity of the location and the nature of the development.

166. The range of developments covered by Schedule 2 includes 'Urban development projects' where:
- the area of the development exceeds 1 hectare and the proposal is not dwellinghouse development; or
  - the site area exceeds 5 hectares.
167. The application site is 0.0534 hectares and as such the proposal does not exceed the Schedule 2 threshold.
168. Consideration, however, should still be given to the scale, location or nature of development, cumulative impacts and whether these or anything else are likely to give rise to environmental impacts of more than local significance. Planning application 21/AP/2838 proposes to demolish the existing 3-storey building and construct in its place a 15-storey mixed-use building rising to a maximum height of 53.62 metres AOD metres, together with public realm improvements and other associated works. Its scale is appropriate to its urban setting and it is unlikely to give rise to any significant environmental impacts. Those impacts which are identified through the various submitted reports and studies can be mitigated through appropriate conditions or obligations.
169. For the above reasons, an EIA is not required in respect of the proposed development.

### **Amenity impacts on nearby residential occupiers and surrounding area**

170. The importance of protecting neighbouring amenity is set out in Southwark Plan Policy P56, which states "development should not be permitted when it causes an unacceptable loss of amenity to present or future occupiers or users". The 2015 Technical Update to the Residential Design Standards SPD 2011 expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.

#### Daylight and sunlight

171. The NPPF sets out guidance with regards to daylight/sunlight impact and states "when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site". The intention of this guidance is to ensure that a proportionate approach is taken to applying the BRE guidance in urban areas. London Plan Policy D6 sets out the policy position regarding this matter and states "the design of development should provide sufficient daylight and sunlight to new and surrounding houses that is appropriate for its context". Policy D9 (Tall Buildings) states that daylight and sunlight conditions around the building(s) and neighbourhood must be carefully considered. Southwark Plan policies identify the need to properly consider the impact of daylight/sunlight without being prescriptive about standards.

172. The BRE Guidance sets out the rationale for testing the daylight impacts of new development through various tests. The first and most readily adopted test prescribed by the BRE Guidelines is the Vertical Sky Component assessment (VSC). This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27%, which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by approximately 20% of the original value before the loss is noticeable.
173. The second method is the No Sky Line (NSL) or Daylight Distribution (DD) method, which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of more than 20% in the area of sky visibility, daylight may be affected.
174. Another method of calculation is the Average Daylight Factor (ADF). This is the most effective way to assess the quality and quantity of daylight in rooms within new dwellings, but should only be used where the layout and window positions are known. The ADF takes into account the amount of daylight received on the surface of the window(s), the size and number of windows, the size and use of the room, the diffuse visible transmittance of the glazing used, the maintenance factor and the reflectance of the room surfaces. The recommendations for ADF in dwellings are 2.0% for kitchens, 1.5% for living rooms and 1.0% for bedrooms. In the case of a kitchen/living/dining space, 2.0% should applied. The BRE recommends that while ADF is an appropriate measure for new buildings and master planned areas, VSC/NSL should be principally used to assess impact on existing buildings.

#### Properties assessed for daylight impacts

175. This planning application was accompanied by a daylight and sunlight assessment undertaken in accordance with the BRE guidelines. The document assesses the extent to which the proposed development would affect the dwellings in the following buildings:
- 1) 1 Oswin Street, Metropolis
  - 2) Hayles Buildings, Elliott's Row
  - 3) 65, 66, 67 and 68 Elliott's Row
  - 4) 35 St George's Road
  - 5) Laurie House, Gaywood Street
  - 6) Perronet House, Princess Street
  - 7) LCC, Block W1 (consented)
176. Provided below is a map of the residential buildings (in turquoise) showing their relationship to the application site (in dark blue):



Image 16 (above): Site location plan with the surrounding existing sensitive residential buildings highlighted turquoise. Building 7 (W1 of the LCC consented redevelopment) is the building in the bottom right hand corner of the image.

177. For the purposes of the applicant's daylight and sunlight report, the consented LCC buildings (W1, W2 and W3) have been modelled as part of the "existing" context to understand the cumulative effect the consented scheme may have on other surrounding properties, and to assess the impact on the consented building itself.

#### VSC and NSL impacts for sensitive surrounding residential properties

178. The table below summarises the VSC impacts to surrounding properties as a result of the proposed development being built-out in the present day context plus the LCC W1 scheme:

Property	Number of windows that would experience a VSC reduction (as a percentage of the baseline VSC value)			
	No loss or a loss of up to 19.9%	20%-29.9% (minor adverse impact)	30%-39.9% (moderate adverse impact)	40% + (substantial adverse impact)
<b>1 Oswin Street, Metropolis</b>				
Total no. habitable windows tested: 13				
<ul style="list-style-type: none"> <li>Of the 13 windows, none would retain a VSC of 27% or more.</li> <li>The distribution of percentage reductions of these <u>13</u> windows is:</li> </ul>				
Proposed vs existing	12	1	0	0



<b>Hayles Buildings, Elliott's Row</b>				
Total no. habitable room windows tested: 35				
<ul style="list-style-type: none"> <li>• Of the 35 windows, none would retain a VSC of 27% or more.</li> <li>• The distribution of percentage reductions of these <u>35</u> windows is:</li> </ul>				
Proposed vs existing	15	5	4	11
<b>65, 66, 67 and 68 Elliott's Row</b>				
Total no. habitable room windows tested: 16				
<ul style="list-style-type: none"> <li>• Of the 16 windows, none would retain a VSC of 27% or more.</li> <li>• The distribution of percentage reductions of these <u>16</u> windows is:</li> </ul>				
Proposed vs existing	14	2	0	0
<b>35 St George's Road</b>				
Total no. habitable room windows tested: 28				
<ul style="list-style-type: none"> <li>• Of the 28 windows, 10 would retain a VSC of 27% or more.</li> <li>• For the <u>18</u> that would not, the distribution of percentage reductions is:</li> </ul>				
Proposed vs existing	15	3	0	0
<b>Laurie House, Gaywood Street</b>				
Total no. habitable room windows tested: 66				
<ul style="list-style-type: none"> <li>• Of the 66 windows, 21 would retain a VSC of 27% or more.</li> <li>• For the <u>45</u> that would not, the distribution of percentage reductions is:</li> </ul>				
Proposed vs existing	45	0	0	0
<b>Perronet House, Princess Street</b>				
Total no. habitable room windows tested: 53				
<ul style="list-style-type: none"> <li>• Of the 53 windows, 29 would retain a VSC of 27% or more.</li> <li>• For the <u>24</u> that would not, the distribution of percentage reductions is:</li> </ul>				
Proposed vs existing	16	7	0	1

179. The table below summarises the NSL (also known as ‘daylight distribution’) impacts to surrounding properties as a result of the proposed development being built-out in the present day context plus the LCC W1 scheme:

Property	No. windows that would experience a reduction in NSL (as a percentage of the baseline NSL value)			
	No loss or a loss of up to 19.9%	20%-29.9% (minor adverse impact)	30%-39.9% (moderate adverse impact)	40% + (substantial adverse impact)
<b>1 Oswin Street, Metropolis</b>				
Total no. habitable rooms tested: 7				
Proposed vs existing	7	0	0	0
<b>Hayles Buildings, Elliott’s Row</b>				
Total no. habitable rooms tested: 35				
Proposed vs existing	18	3	7	7
<b>65, 66, 67 and 68 Elliott’s Row</b>				
Total no. habitable rooms tested: 16				
Proposed vs existing	15	1	0	0
<b>35 St George’s Road</b>				
Total no. habitable rooms tested: 10				
Proposed vs existing	9	0	1	0
<b>Laurie House, Gaywood Street</b>				
Total no. habitable rooms tested: 18				
Proposed vs existing	18	0	0	0
<b>Perronet House, Princess Street</b>				
Total no. habitable rooms tested: 40				
Proposed vs existing	40	0	0	0

1 Oswin Street, Metropolis

180. One window would experience a 27.69% proportional reduction in VSC. It is understood that the room is served by an additional three windows, none of which would experience VSC losses in excess of the BRE guidance. As such, and when also considering the room would experience no reduction in NSL, the daylight impacts to this property would be minor.

Hayles Buildings, Elliott's Row

181. Of the surrounding existing dwellings, those within the Hayles Buildings would experience the greatest extent of VSC impact as a result of the proposed development. 11 windows would experience substantial adverse VSC reductions. It is understood that the affected rooms are 3 living rooms, 4 kitchens, 2 kitchen/diners and 2 bedrooms.
182. The single greatest percentage loss of VSC would be 82.14%, affecting a living room and resulting in an absolute VSC value of 0.60%. While this substantial percentage loss must be acknowledged, the existing absolute VSC value is very low, at 3.36%. This low baseline is largely attributable to the host building's design, whereby the window in question looks onto a covered deck-access walkway and is situated close to a corner, restricting the window's access to daylight. Of the other ten substantially impacted windows, four have the same recessed configuration, including the second most significantly impacted window (where the VSC percentage loss would be 76.54%, but from a very low existing absolute VSC value of 2.43%). Given that these windows are heavily reliant on limited quantity of incoming daylight from the direction of the application site, any reasonable redevelopment of the site would inevitably cause marked proportional VSC reductions to these windows.
183. While the six other windows at the Hayles Buildings affected to a substantial adverse extent are not recessed, they stand comparatively closer to the site boundary. These rooms are understood to be a mix of two bedrooms and four kitchens.
184. With regard to the two bedrooms, the absolute VSC of the windows would be reduced to 13.02% and 13.63%. The daylight demands of bedrooms are not as great as other habitable rooms because their primary function is to provide sleeping accommodation, and as such the resulting losses are considered acceptable given the urban context.
185. With regard to the four kitchen windows, these are set back farther from the site than the bedrooms, but the existing daylight they receive is limited to an extent by an adjacent projecting wing at the Hayles Buildings. The absolute VSC of the four windows would be reduced to 6.94%, 7.48%, 7.84% and 8.87% as a result of the proposed development. While occupiers would experience a noticeable change to daylight levels, the resulting values, although low, are not uncommon for an urban environment.

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186. With regard to NSL, there are a total of 17 site-facing rooms at the Hayles Buildings that would be adversely impacted. Three of these would be impacted to a minor adverse extent, seven to a moderate adverse impact and seven to a substantial adverse impact.
187. The rooms substantially adversely impacted are understood to comprise three kitchens, two kitchen/diners and two living rooms. The losses would range from 41.0% to 63.2%. These seven rooms are located on the uppermost two floors of the Hayles Building, and as such currently enjoy a good area of existing sky visibility over the ridge line of the existing 21 St George's Road building opposite. Standing three and a half storeys tall, the existing building is relatively low rise not just in the context of its immediate surroundings, but also in view of its Major Town Centre location. Thus, any reasonable development of the land would have a material effect on the portion of sky visible from these nearby rooms at the Hayles Buildings. For these reasons, and while fully recognising the extent of the NSL reductions, it is not considered that the impact would be significantly harmful to the occupiers' overall amenity.

65, 66, 67 and 68 Elliott's Row

188. Two minor adverse losses would be experienced at these properties. However, in both cases these proportional losses are marginally in excess of the BRE threshold, at 20.46% and 20.89%. The windows would retain absolute VSC values of 17.81% and 19.99%, which are considered reasonable in an urban environment.
189. There would be one minor adverse impact to NSL, but the exceedance of the BRE guidance would be marginal at 21.1%. While this should nevertheless be recognised as a minor adverse impact, it would still be possible for users to see direct sky from a 52.5 square foot portion of the room, meaning the space as a whole would not become uncomfortably cold or dark.

35 St George's Road

190. The three minor adverse VSC losses at 35 St George's Road would, similarly to those at Elliott's Row, be only slightly in excess of the BRE threshold, at 20.65%, 21.58% and 22.43%. None of the resulting absolute VSC levels for the three windows would be below 18%, which is considered reasonable for an urban environment.
191. There would be one moderate adverse impact to NSL, which would affect a first floor window. The existing NSL would be reduced by 32.9%. The affected room faces directly towards the centreline of the application site, and as such the redevelopment of the site to provide a taller building will inevitably reduce the proportion of the room from which sky can be seen. While the degree of impact is acknowledged, taking account of the fact that the window would not undergo a loss of VSC in excess of the BRE guidelines, it is not considered that the occupiers would be subject to a harmful loss of daylight loss.

Perronet House, Princess Street

192. One first floor window at Perronet House, which is tucked into the canopied corner where the taller block intersects the plinth block, would experience a substantial adverse reduction in VSC of 40.62%. However, this is due to the low baseline value; the actual change in VSC would be only 2.64% (from an absolute value of 6.5% down to 3.86%). The other seven windows to experience losses in excess of the BRE guidance, all of which are located at first floor level in the plinth building, would be adversely affected to a minor extent. Overall, and given that all rooms at Perronet House would experience proportional changes in NSL of less than 20%, the effects to the daylight level at these properties would not be harmful to amenity.

ADF impacts for sensitive surrounding residential properties

193. The applicant's daylight and sunlight report also includes ADF testing of the consented W1 building at the LCC site, immediately to the east of the application site. The impacts are summarised below:

Property	Rooms that would experience a loss of ADF to less than the level advised by BRE guidance			
	Bedroom	Living Room	Kitchen or Liv/Din/Kit	Total
<b>London College of Communication site, Block W1 (consented)</b>				
Total no. rooms tested: <b>83</b>				
Existing vs proposed	0 (of 70)	N/A	0 (of 13)	0

194. As the table above shows, none of the 83 site-facing rooms would experience a loss of ADF to less than the level advised by BRE guidance. All rooms tested will therefore continue to receive good levels of daylight with the development in place.

Sunlight

195. The applicant's daylight and sunlight report has assessed the impact of the proposed development on the sunlight received at all windows facing within 90 degrees of due south. The BRE guide states that nearby windows must be assessed using the three-stage process set out below to determine if, as a result of the development, the sunlight levels would reduce to an extent that the room may feel colder and less pleasant.

196. The first stage is to determine if the window would experience:

- a reduction in sunlight to less than 25% Annual Probable Sunlight Hours (APSH); or

- a reduction in sunlight to less than 5% Winter Probable Sunlight Hours (WPSH); or
- both of the above.

197. If one of the above criteria is triggered, the next stage is to determine if:

- the window's resulting APSH is less than 0.8 times its former value; or
- the window's resulting WPSH is less than 0.8 times its former value; or
- both of the above.

198. Where one of the criteria in Stage 2 is met, the final stage is to determine if the overall loss of sunlight across the whole year would reduce by more than 4% of APSH.

199. The seven properties assessed for daylight impacts have also been assessed for sunlight impacts. The table below summarises these. The assessment is based on the proposed development being built-out in the present day context plus the LCC W1 scheme:

Property	No. windows that would experience a reduction in sunlight hours			
	No. of windows tested	No. of windows that pass	No. of windows that fail winter	No. of windows that fail annual
<b>1 Oswin Street, Metropolis</b>				
Proposed vs existing	1	1	0	0
<b>Hayles Buildings, Elliott's Row</b>				
Proposed vs existing	35	33	0	2
<b>65, 66, 67 and 68 Elliott's Row</b>				
Proposed vs existing	16	16	0	0
<b>35 St George's Road</b>				
Proposed vs existing	28	23	5	0
<b>Laurie House, Gaywood Street</b>				

Proposed vs existing	66	66	0	0
<b>Perronet House, Princess Street</b>				
Proposed vs existing	53	53	0	0

200. At the Hayles Buildings, the two windows to experience a reduction in APSH in excess of the BRE guidance serve living rooms. In one case, the number of sunlight hours would be reduced from 5 as existing to zero as proposed. In the other, the number of sunlight hours would be reduced from 4 as existing to zero as proposed. The two windows in question are also the two most heavily impacted windows in terms of VSC percentage loss. As discussed in the 'Daylight Impacts' section of this report, the windows are recessed and thus the inherent design of the building heavily constrains the availability of sunlight. As such, while the further reduction the proposed development would bring is likely to be perceived by the occupiers, because the existing sunlight levels are so low it is not considered that the degree of change within these two rooms would be harmful.
201. The one other residential building to experience sunlight losses in excess of the BRE guidance is 35 St George's Road. Five windows, each serving separate apartments, would experience substantial adverse WASPH impacts. However, these windows face within 90 degrees of due north, and have only been included in the testing because they form part of rooms that contain other windows facing south. The windows themselves receive marginal sunlight levels of 1 APSH at present, which would reduce to zero as a result of the development. Despite the significant percentage change of 100%, in reality the effect would be unnoticeable to the users of the five rooms, especially as the other (south facing) windows would experience no or barely noticeable changes in WASPH.
202. It should be noted that no sunlight testing of the consented W1 building at the LCC site is necessary, as all of the site facing windows are oriented within 90 degrees of due north.

#### Conclusion on daylight and sunlight

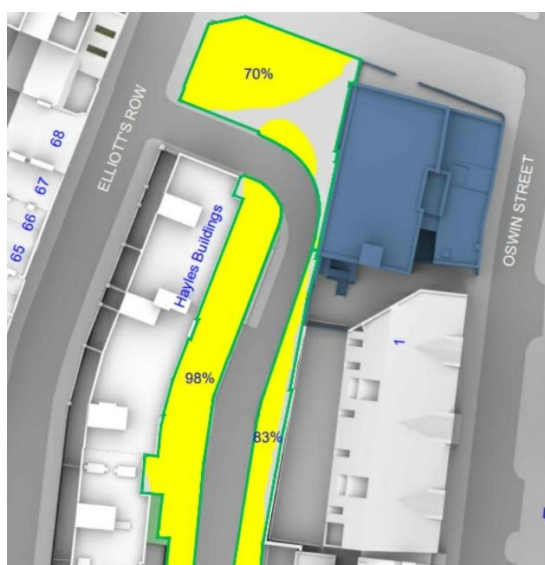
203. In total, the development would result in 18 minor, 4 moderate and 12 substantial adverse reductions in VSC for surrounding properties. With respect to NSL, there would be a total of 4 minor, 8 moderate and 7 substantial reductions for surrounding properties. These exceedances of the BRE guidance, and the negative impact they would have on neighbour amenity, should be given some weight in determining the application.
204. However, when interpreting the daylight losses, regard must be had to the relatively low-rise character of the existing building on the site, as well as its location within a comparatively more densely-developed environment. Some of

the most impacted properties stand close to the site boundary, and thus are overly reliant on it for their receipt of light, or have design features that significantly limit the existing internal light levels, as a result of which any meaningful development on neighbouring land would generate sizeable percentage losses.

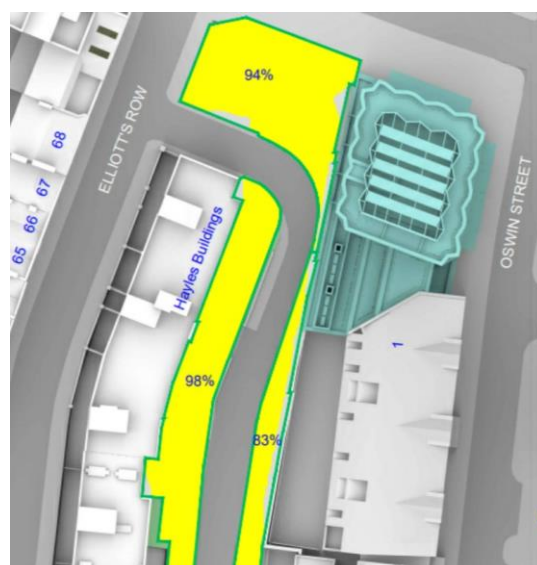
205. Sunlight exceedances would be experienced by two windows at the Hayles Buildings. In both cases, elements inherent to the building's design (such as deck overhangs and pier walls) already significantly hinder sunlight receipt such that any further reduction produces a large percentage loss not representative of how the change would truly be experienced by the users of the room.
206. On balance, and noting that the BRE guidelines should be applied with a degree of flexibility in urban environments, it is not considered that the daylight and sunlight losses, and the degree of harm to amenity, would warrant withholding planning permission.

### Overshadowing

207. The applicant's shading analysis has demonstrated that, in the current-day scenario, 70% of the Elliott's Row pocket park receives more than 2 hours of direct sunlight on the Spring Equinox. With the proposed development in place, 94% of the pocket park would receive more than 2 hours of direct sunlight on the same day. This improvement in sunlight access is largely attributable to the redistribution of massing that would occur as result of the development, whereby the proposed built mass on the southern portion of the site would be of a lesser scale than the existing three and a half storey structure, thus enabling more sunlight to penetrate the southern edge of the pocket park.



*Image 17 (above): Extent of sun-on-ground at nearby open spaces on the Equinox in the current-day scenario*



*Image 18 (above): Extent of sun-on-ground at nearby open spaces on the Equinox in the proposed scenario*

### Privacy



208. A number of representations from members of the public have objected to the proposal on the grounds that it would infringe on the privacy of surrounding existing properties and the Elliott's Row Pocket Park.
209. There are no planning policies or guidelines concerned with protecting the users of public external spaces from overlooking. However, it is recognised that the introduction of the proposed fifteen storey building adjacent to the pocket park would give rise to an increase in perceived overlooking, which could detract from the park's appeal and sense of privacy.
210. With regard specifically to preventing harmful overlooking of dwellings, the 2015 Technical Update to the Residential Design Standards SPD 2011 requires developments to achieve:
- a distance of 12 metres between windows on a highway-fronting elevation and those opposite at existing buildings; and
  - a distance of 21 metres between windows on a rear elevation and those opposite at existing buildings.
211. The above minimum distances would be achieved between the proposed development and all surrounding existing and consented dwellings, with the exception of some of the flats in the Hayles Buildings. The closest distance between any clear-glazed windows at the Hayles Buildings and the façade of the proposed building would be approximately 12.6 metres, which represents a marginal improvement on the existing relationship.

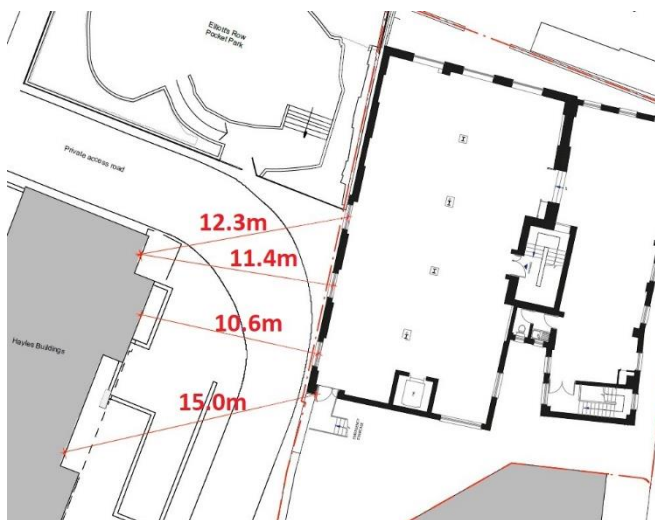


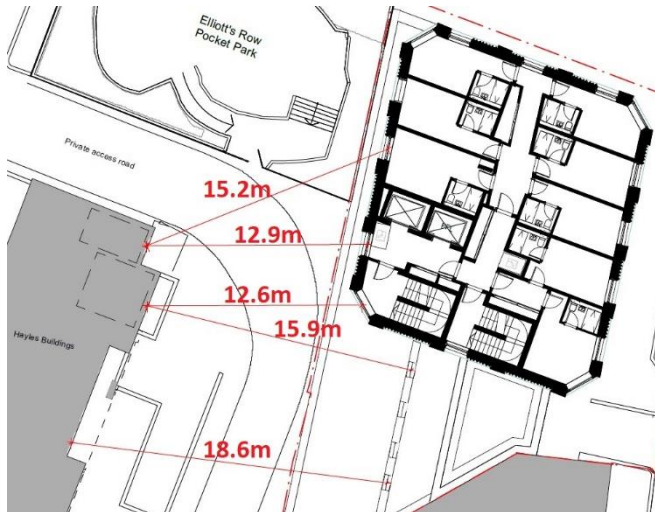
Image 19 (above): First floor plan of the existing building, showing the distances to the clear-glazed windows at the Hayles Buildings



Image 20 (above): View from the existing building towards the Hayles Buildings opposite

212. In recognition of the concerns raised by members of the public about overlooking of the dwellings within the Hayles Buildings and the pocket park, the applicant has agreed to apply obscuring treatments to some of the windows on the proposed building's west and south elevations. The treatments would comprise:

- full-height ‘frosting’ to fifteen windows across levels 1 to 3 of the building (depicted in orange in the figure below);
- full-height directional film applied to two windows at level 3 of the building (depicted in red in the figure below); and
- 1.8 metre high ‘frosting’ to thirty-one windows, across levels 3 to 14 (depicted in blue in the figure below).

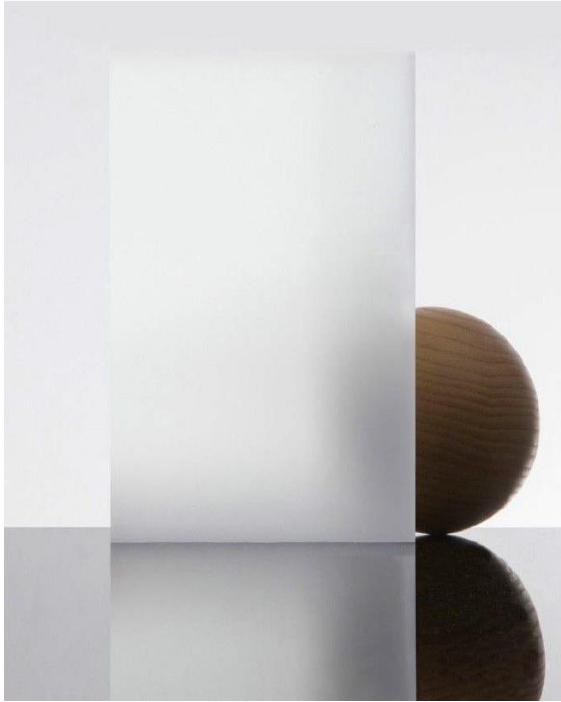


*Image 21 (above): Fifth floor plan of the proposed building, showing the distances to the clear-glazed windows at the Hayles Buildings*

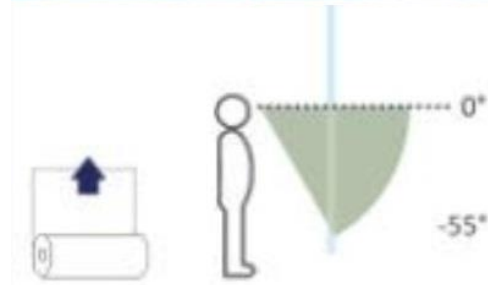


*Image 22 (above): Isometric of the building, showing the proposed treatment to the south and west facing glazing*

213. The permanent ‘frosted’ treatment would be achieved by acid etching, fritting or sandblasting the surface; this would produce a translucent effect. As well as preventing views out, the frosting would also lessen the light transmission from inside to outside, reducing light pollution. As these 46 windows serve office floorspace and circulation cores, the lack of outlook that would result for users of the development would not be harmful.
214. With regard to the two windows at level 3 of the building adjacent to Elliott’s Row Pocket Park, both of which would serve hotel rooms, the directional film the applicant proposes to install is called ‘Lumisty’ view control’. The ‘Lumisty’ product changes the appearance of glass from translucent to transparent and vice versa according to the viewing angle of the person inside the room. A selection of options are available providing privacy or visibility in a vertical or horizontal direction. The applicant proposes to apply to both windows a type of ‘Lumisty’ that blurs downward views but leaves horizontal and upward views unobstructed. This would significantly reduce opportunities for hotel guests staying at either of these rooms to obtain views ‘down’ into the pocket park. All hotel rooms from level 4 upwards fronting the pocket park would be fitted with clear glazing, which –given that these windows are relatively high in relation to the pocket park, thus limiting any risk of perceived overlooking– is considered reasonable in the interests of ensuring the room occupiers can enjoy a good quality of outlook.



*Image 23 (above): Example of the obscuring effect of the proposed 'frosted' treatment.*



*Image 24 (above): Example of the obscuring effect of the proposed 'Lumisty' view control treatment.*

215. To ensure the 'frosted' and 'Lumisty' treatments achieve an adequate degree of visibility reduction, it is recommended that approval of 22/AP/2838 be subject to a condition requiring sample panels to be submitted to and approved by the Local Planning Authority prior to above grade works taking place.
216. In conclusion, the proposed building would be separated from the majority of the surrounding dwellings by distances in excess of those advised by the Residential Design Standards, thus protecting these residents from any harmful overlooking. Taking account of the opaquing treatment to some of the windows on the south and west elevations, which would reduce both the actual and perceived impact on the privacy of the Hayles Buildings residents and the pocket park users, it is considered that no harmful privacy impacts would result from the proposed development.

### Outlook and sense of enclosure

217. The site is located at a point of transition between the Major Town Centre, which is characterised by a dense urban grain including a number of existing and consented tall buildings, and the lower-rise but nevertheless relatively tightly-knit townscape to the west around Elliott's Row and West Square. The development would introduce to the site a single tower rising from a longer three-storey base/plinth. The tower element has been located on the northern portion of the site to optimise separation distances to surrounding properties, stepping down to the much lower height of three storeys on the more sensitive southern portion. The tower has been designed with chamfered corners to reduce its apparent width, while the western side of the base/plinth element would be of a tiered massing to retain a good sense of openness for the

dwellings directly opposite in the Hayles Buildings. The proposal would incorporate high quality materials and extensive green walls and roofs, all of which would have a positive effect on the surrounding properties' outlook. As such, it is not considered that any of the surrounding dwellings which look towards the site would experience a harmfully diminished quality of outlook or sense of openness as a result of the proposed development.

## Noise and vibration

### Plant noise

218. Plant (power, heating and cooling machinery) would be located on the roof of the tower, as well as on the roof of the ground floor storey of the base/plinth part of the building. The plant on the tower would be screen behind an acoustic enclosure, while the plant on the base/plinth would be contained within its own housing and concealed from public view by a parapet wall.
219. Noting the potential for the office to be used through the night, one public comment about the planning application raised concerns about the night-time noise levels from the plant. In response to this, the applicant has confirmed that a night-time set-back, or "quiet-mode", will be implemented to ensure that the necessary acoustic levels are achieved in line with the Southwark standard noise controls.
220. A condition is recommended requiring the plant not to exceed the background sound level (LA90 15min) at the nearest noise sensitive premises, and for the specific plant sound level to be 10 dB(A) or more below the representative background sound level in that location, all to be calculated fully in accordance with the relevant Building Standard. The condition is considered sufficient to ensure that the proposed plant will not have an unacceptably adverse impact on existing neighbouring residents or the users of the building.

### Public noise nuisance

221. In terms of public noise nuisance from the development for surrounding residents, the only potential sources are the proposed restaurant/café unit and micro retail unit. Examples of potential noise nuisance include the use of the restaurant/café for entertainment or music incidental to the dining function, and the late night serving of food and drink to customers from the serving hatch.
222. In order to limit any risk of public noise nuisance, it is recommended that the following opening hours limitations be imposed on the retail uses:
- Restaurant/café unit:
    - For visiting members of the public: 07:00-23:00 Mondays to Saturdays and 08:00-22:00 Sundays and Bank Holidays
    - For hotel guests: 06:00-23:00 Mondays to Saturdays and 06:00-22:00 Sundays and Bank Holidays
  - Micro retail unit: 07:00-22:00 Mondays to Sundays (incl. Bank Holidays)

## Odour

223. The application is accompanied by an extraction and ventilation statement. This explains that the restaurant/café and micro retail unit will contain food re-heat facilities only and will not have facilities for full cooking with kitchen extract/exhausts. This will minimise the risk of odour impacts on surrounding properties.

## **Design**

224. Paragraph 56 of the NPPF stresses the importance of good design, considering it to be a key aspect of sustainable development. Chapter 12 of the NPPF (Achieving Well Designed Places) is the key national policy for design. In particular para 134 requires development to reflect local and national design policies, guidance and SPDs. It sets out that outstanding or innovative design should be given significant weight in decision making, and requires development that is not well designed to be refused.
225. Chapter 3 of the London Plan 2021 deals with design related matters. Policy D3 promotes a design-led approach to making the best use of land. Policies D4 and D8 build on this, setting out the design principles for ensuring new development makes a positive contribution in terms of architecture, public realm, streetscape and cityscape. Policy HC1 advises that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural detail.
226. London Plan Policy D9 is specifically concerned with tall buildings. The policy sets out a list of criteria against which to assess the impact of a proposed tall building – namely locational, visual, functional, environmental and cumulative. London Plan Policy D4 requires all proposals exceeding 30 metres in height to have undergone at least one design review or demonstrate that they have undergone a local borough process of design scrutiny. The proposed building would, at 50.29 metres above ground level, exceed the 30 metre threshold. It thus engages Policy D9.
227. The importance of good design is further reinforced by Policies P13 (Design of Places), P14 (Design Quality) and P17 (Tall Buildings) of the Southwark Plan. These policies require all new developments to:
- be of appropriate height, scale and mass;
  - respond to and enhance local distinctiveness and architectural character;
  - conserve and enhance the significance of the local historic environment;
  - take account of and improve existing patterns of development and movement, permeability and street widths;
  - ensure that buildings, public spaces and routes are positioned according to their function, importance and use;
  - improve opportunities for sustainable modes of travel by enhancing connections, routes and green infrastructure; and

- be attractive, safe and fully accessible and inclusive for all.

228. Specifically for tall buildings, Policy P17 requires:

- the location to be within a major town centre, an opportunity area and/or the CAZ, where tall buildings are appropriate;
- the location to be at an area of landmark significance;
- proposals to a proportionate height to the location and site;
- proposals to have a positive impact on the London skyline;
- proposals to respond positively to local character and townscape;
- there to be no harmful impact on strategic views;
- proposals to provide a functional public space; and
- the provision of newly publically accessible space near or at the top of the building where appropriate.

229. It also sets out that the design of tall buildings must:

- be of exemplary design and quality;
- conserve and enhance designated heritage assets and make a positive contribution to the wider townscape;
- avoid harmful environmental impacts;
- maximise energy efficiency; and
- have a positive relationship with the public realm, provide opportunities for new street trees, design lower floors to successfully relate to and create positive pedestrian experience, provide wider footways and accommodate increased footfall.

### Site layout, access and public realm

230. The proposed site layout is well-conceived, opening up the majority of the site's St George's Road and Oswin Street perimeters with new street-facing town centre uses, one of which –the micro retail unit– will function akin to a street food stall, helping animate the public realm. The legible entrances of these ground floor uses, and the broader extensive glazed frontage within which they would sit, would bring transparency to the base of the building and provide a positive relationship with the new public realm.

231. The proposals for new public realm to St George's Road and Oswin Street, incorporating high quality surface treatments, continue the example set by the adjacent consented LLC scheme, delivering a positive and coherent public realm experience. The details of the finishes will be secured through the Section 278 Agreement, in conjunction with Council's Highways Team.

232. The proposed interface with the pocket park would take the form of a windowless brick facade at low level, which would be articulated with brickwork piers to continue the rhythm of the masonry frame on the building's upper storeys. This non-glazed condition would allow for seating and climbing plants to be placed on the pocket park's western edge, should the custodians consider this appropriate. At first and second floor levels on this boundary, the building

has been designed with integrated living walls to provide a backdrop of greenery to the park.

233. The co-location of office, hotel and retail uses within a building of relatively modest footprint has been well resolved, with minimised circulation internally and a rational arrangement of rooms across all floors and uses.
234. The servicing and back-of-house areas have been restricted as much as possible to within the heart of the site, which is welcomed in the interests of optimising active frontage around the perimeter. Wider footways would be provided along St George's Road and Oswin Street, helping to reinforce existing routes around the site, while also making the pedestrian experience more comfortable.
235. In summary, the proposed ground plane is considered to be well resolved, with the building providing strong and engaging street frontages together with enhanced public realm. Despite the complexities that co-locating three uses could present, the internal layout of the upper floors and shared servicing spaces within the basement is rational and efficient. Externally, the widened footways are welcomed, as is the appropriately 'soft' condition –comprising green walls and relatively few windows on the lower floors– on the pocket park boundary.

### Height, scale, massing and tall building considerations

236. 21 St George's Road sits at an important juncture, where the urban hinterland to the west –consisting of the statutorily instituted Elliott's Row and West Square conservation areas– meets central Elephant and Castle. The site is within the Elephant and Castle Opportunity Area, and is adjacent to the consented scheme at the LCC site, as shown in the images below. The consented towers at the LCC would stand to 20, 24 and 40 storeys. The LCC scheme also includes a single storey pavilion that would form the centrepiece of an area of new public realm space adjacent to Oswin Street.



*Image 25 (above): Massing model, looking southwards across Elephant and Castle, showing the proposed development (depicted in gold) in the context of the existing and consented townscape, including the adjacent LCC towers.*

237. Opposite the site on the northern side of St George's Road is Perronet House. This comprises two conjoined blocks, the taller of which is 11 storeys in height and contains retail at ground floor and residential uses on the storeys above, while the lower three-storey block incorporates residential use and a doctor's surgery. Further to the west are three storey terraced houses fronting Gaywood Street and the Gaywood Estate, including the 11-storey Prospect House.
238. To the south and west are predominantly residential areas, including flatted developments and terraced housing. Building heights in these areas are generally in the range of three to six storeys. In this neighbourhood, buildings are generally more historic than those in the centre of Elephant and Castle, albeit dating from a number of different eras. Immediately to the south of the application site is the Metropolis building, a relatively modern flatted development. The nearest properties to the west of the site are the Hayles Buildings, a succession of early 20th Century five-storeyed mansion blocks.
239. The site acts as a transitional point between, to the west, the residential areas, and to the east, the town centre around the station and shopping centre.





*Image 26 (above): Cross-section west-to-east through the site, showing the relationship of the proposed building to, on the left hand side of the image, the lower-rise townscape around Elliott's Row and, to the right hand side, the existing and consented taller buildings around the town centre.*

240. The proposed development is of a height that would sit comfortably under the “shoulder” height of the adjacent LCC approved scheme, and would continue to diminish built form in height to help manage a downwards transition to the residential areas to the east and south. The proposals would be viewed in the context of the taller existing and consented towers around Elephant and Castle, and the height, scale and mass has been articulated to ensure that coalescence is avoided.



*Image 27 (above): Visualisation of the proposal in the existing context, looking southwards from Princess Street.*



*Image 28 (above): Visualisation of the proposal in the existing context, looking eastwards from the peninsula.*

241. Although a number of public representations have objected to the proposal on the grounds that its height would exceed the six storeys recommended for this site in the Elephant and Castle SPD and OAPF, this document was rescinded by Cabinet in October 2022. It is therefore no longer a material planning consideration. For the 21 St George's Road site, decisions about height, scale,

massing should be guided by the NPPF, the Planning (Listed Buildings and Conservation Areas) Act 1990 and the statutory development plan.

242. With regard to policy compliance with London Plan Policy D9 (Tall buildings) and Southwark Plan Policy P17 (Tall Buildings), the following aspects are of consideration:

*Landscape contribution:*

243. The development includes additional public open space on-site and a number of significant improvements to the public realm locally. These are considered to be commensurate with the scale of development.

*Point of landmark significance*

244. The site, being close to the town centre of Elephant and Castle, which includes a public transport interchange, education facilities and a retail centre, is considered to be a point of landscape significance. The site location, on the fringes of this major town centre, has informed the height and scale of the building. The height of the building is considered appropriate for this area.

*Highest architectural standard*

245. The proposed building would be a high quality new-build scheme, incorporating a pallet of robust and rich facing materials, brought together into a refined and striking architecture through careful detailing. It would deliver high-performance commercial and hotel accommodation. The scheme is designed to achieve an excellent BREAM rating. The architecture itself is well considered.

*Relates well to its surroundings*

246. At ground floor level –where large framed glazing and principle entrances to the restaurant/café hotel are proposed, complemented by a micro retail unit that would open directly onto the public realm– the scheme would concentrate the active frontage along the public highway. The brick panelling facing the pocket park would provide screening from close-range overlooking, and the incorporation of green walling would help the building sit more comfortably in relation to the pocket park. The lower rise base/plinth block on the southern portion of the site would provide a transition between the tall 15 storey element and the scale of the existing buildings adjacent. The proposals for improved public realm, achieved by setting the building back from the existing pavement line, would make for an improved pedestrian experience along St George’s Road. Additionally, it would better link the public realm of the LCC scheme with the length of St George’s Road as it stretches westwards, while also helping create stronger visual links between the LCC public realm and the pocket park.

*Positive contribution to the London skyline*

247. The building would form the context to the large-scale buildings that sit within Elephant and Castle Major Town Centre, standing adjacent to and

consolidating the cluster of consented taller structures on the LCC site, but being of a lesser order of height so as to mediate between these buildings and the lower-rise townscape to the west. The building's contribution would be positive, with an engaging architectural treatment and elegant concertina expression to its crown.

*Free-to-enter publicly-accessible areas*

248. Within the red line boundary of the site, two strips of land along the building's frontage –one on St George's Road and one on Oswin Street– would be provided as additional public realm, widening the footway. Together, these two pieces of public realm would have a surface area of approximately 69 square metres.
249. While the strip of new public realm along St George's Road would be only 1.0 metre in depth, it must be recognised that the application as whole would enable the removal of the existing kiosk from the existing footway, where it currently presents an obstruction to footway traffic, narrowing the effective width to approximately 3.1 metres. By providing affordable retail premises within the demise of the proposed building, the application would allow for the removal of the existing kiosk and for the trading pitch to be extinguished. This would create a significantly enlarged area of public realm along this section of St George's Road, measuring 6.0 metres from kerblines to building frontage.
250. The total surface area of proposed public realm represents 7.3% of the site's footprint. Given the modest footprint of the site, together with the benefits brought by the removal of the kiosk, the total quantum of off- and on-site publicly accessible realm created by the redevelopment would be commensurate to the height of the proposed tall building.
251. Accessible public space at the top of the building, as is required by Policy P17 of the Southwark Plan, would not be provided by the proposal. In this instance, it is not considered reasonable to require the applicant to provide high-level publicly-accessible facilities because the proposal does not occupy a site and would not be of a height in the context of the Elephant and Castle Opportunity Area that would make it appropriate for such a function.

*Conclusion on massing, height, scale and tall building considerations*

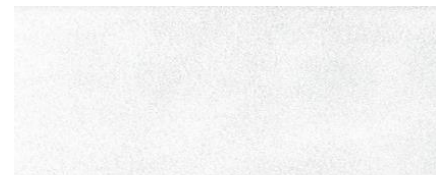
252. Overall and having taken account of the effects arising cumulatively with other existing, consented and planned tall buildings nearby, the development's design meets the policy criteria for a new tall building. However, a significant outcome of a tall building is its visibility and while this is not harmful in itself, the potential effects on the 'receptor' townscape and heritage assets are of special concern.
253. As covered later in this report, in compliance with the requirements of London Plan Policy D4, the proposals were presented to Southwark's Design Review Panel in January 2020.

## Architectural design and treatment

254. The primary elevational material is proposed to be masonry. This would be complemented by brick piers that take a rusticated expression on the lower three storeys of the building. 50mm high bricks are proposed to give a more contemporary appearance.
255. Horizontal slab edges and canopies would be in reconstituted stone or GRC type cast product, as would the reveals to the infill panels. Flat elements such as the slab edges would be in a matt finish whereas profiled elements with relief –such as the canopies, projecting fins and infill panels to levels 3 to 12– would be in a more reflective gloss finish.
256. Grooved infill panels from level 3 upwards are proposed to provide texture and refer to nearby post-war buildings. Reveals to the window and door openings would lend depth and relief to the facades. These would be faced in Corten weathered steel at ground to second floor level to add richness and interest to the lower levels of the building.



*Image 29 (above): Rendered north elevation of the lower storeys of the proposed building.*



Pale GRC/ reconstituted stone cladding to slab edge canopies and projecting fins



Linear bricks



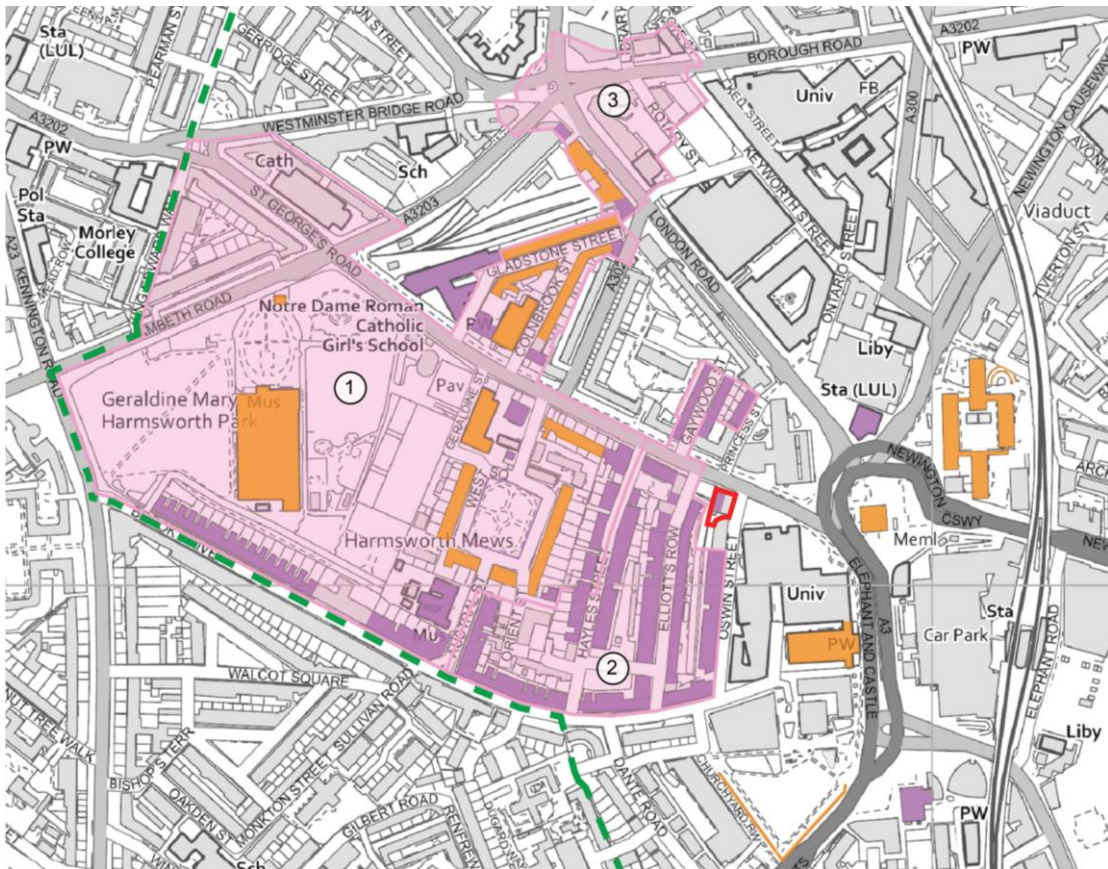
Corten/ weathered steel to glazing reveals

*Image 30 (above): Samples of the main facing materials.*



257. Overall, the facade designs work well to bring a coherent, contemporary appearance to the building. They are sufficiently engaging, making references to the architectural language of the surroundings – the grooved infill panels and rusticated bricks piers picking up on the hammered concrete at Perronet House, and the masonry pilaster walls referencing the Hayles Buildings. The material palette and facade sections (including parapets, fins, canopies and openings) should be conditioned to ensure a high quality of materials and detailing is carried through to the as-built scheme.

## Heritage and townscape impact

258. The site is adjacent to the Elliott's Row Conservation Area. This Conservation Area includes the 19th century houses in Hayles Street, Elliott's Row, and Oswin Street, but excludes the site.
259. The existing buildings on the site, known together as "Castle Works", are on the draft Soutwark Local List of locally listed building (i.e. as an address including both the pre-WW2 and post-war elements of the building).
260. The site lies within the outer limits of the protected vista of the strategic view of the Houses of Parliament from Hyde Park. To the west, further along St George's Road, is the West Square Conservation Area.
261. The site sits within the Elephant and Castle Opportunity Area and the CAZ. In terms of townscape character, it is located on the western edge of the relatively controlled urban form around West Square. The peninsula and shopping centre, which form the heart of the town centre, are nearby to the east; here, buildings are typically 20<sup>th</sup> century and of a broader and taller form than those around West Square. As mentioned in earlier parts of this report, the town centre is undergoing densification and intensification.



## Key to heritage assets and townscape designations map

<u>Conservation areas:</u>		Borough boundary marked with green dotted line	
	Conservation areas	<u>Listed buildings:</u>	
①	West Square Conservation Area (LB Southwark)		Grade II listed building
②	Elliot's Row Conservation Area (LB Southwark)	<u>Locally listed buildings:</u>	
③	St Georges Circus Conservation Area (LB Southwark)		Locally listed building

*Image 31 (above): Map showing the site (edged in red) in the context of heritage designations. The dashed green line denotes the boundary between the Borough of Southwark and the Borough of Lambeth.*

262. The Castle Works were themselves in a transitional zone between streets of housing and an area of commercial and semi-industrial activity. The plot comprises two building, with different facades fronting St George's Road. This includes to the east, a 1950s rebuild over three floors in stock brick and to the west a three storey brown gault brick with black brick quoin structure, with flat pediment in plaster. The light industrial character of the western portion building is reflected in this architecture, although its details, including the windows, have been lost over time. The rear portion of the west wing building, visible over the pocket park from St George's Road is faced in white glazed brick, however modern UPVC windows have replaced the original. Overall the building is an eroded example of a small former industrial building with formal frontage facing the principal street. It has some local quality derived from its remaining architectural features and design, however much of its historic integrity has been lost or rebuilt during the 20th Century. The western portion element of the property is on the draft list of locally important historic buildings, the consultation for which closed in late 2022. The draft description states:

*"Three-storey warehouse above semi-basement level with hidden roof. Gault brick with segmental arches but is fronted in brown brickwork and render".*

263. With regards to local listed structures, the NPPF states at para 203:

*"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."*

264. Policy P26 (Local List) of the Southwark Plan states:

*"Development must take into account locally listed buildings and structures that positively contribute to local character and amenity."*

265. The impact on the non-designated heritage asset would be total loss, and therefore substantial harm to the significance of the asset. While para 203 does not require public benefit to outweigh the harm (as it does with designated assets at para 202), there are clearly a number of public benefits which are provided by the proposals and therefore the policy requires a balanced judgement should be made by the decision makers. In this instance, owing to

the placement of the existing building on the local list, should the application be granted, a planning condition must be imposed requiring a building recording exercise prior to demolition to level 3 of the guidance provided by Historic England in their advice note 'Understanding Historic Buildings A guide to good recording practice'.

266. The application site is adjacent to the Elliott's Row Conservation Area and east of the West Square Conservation Area. The proposals would impact the significance of these conservation areas by affecting the setting of these designated heritage assets. With regards to the conservation areas, the NPPF para 199 states:

*"When considering the impact of a proposed development on the significance of a designated heritage asset, 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."*

267. Also, at para 202 the NPPF states:

*"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."*

268. The Historic England guidance on the "Setting of Heritage Assets" approaches setting in 5 steps:

- Step 1: Identify which heritage assets and their settings are affected;
- Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
- Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;
- Step 4: Explore ways to maximise enhancement and avoid or minimise harm;
- Step 5: Make and document the decision and monitor outcomes.

#### Elliott's Row Conservation Area

##### *Step 1: Identify which heritage assets and their settings are affected*

269. The significance of the Elliott's Row Conservation Area is as a cohesive planned townscape comprising mansion block housing development and two to four storey traditional terraces from throughout the 19th and early 20th centuries. The historic street layout remains, creating a legible and permeable environment. Well-defined streets are a feature with high quality and architecturally interesting frontage development. This is a highly urban environment with little in the way of soft landscaping.



*Image 32 (above): Example view from within the Elliott's Row Conservation Area*

*Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated*

270. The setting of the conservation area includes the immediate network of streets surrounding the conservation area, and the wider Elephant and Castle area. The latter is comprised of large blocks, offices, towers and civic and educational buildings with larger floorplates centred around the Elephant and Castle peninsula and Faraday Memorial, while to the south and east, a quiet network of dense terraces and inner suburban housing is prevalent. Elliott's Row is a transition point between the town centre uses and scale of the Elephant and Castle, towards the more pedestrian scale of West Square, and Brook Drive to the south. The thoroughfares of Brook Drive, and more notably, St George's Road create a barrier between the conservation area and the wider area, while the planned square of West Square to the west marks a more formal arrangement of historic urban planning. In particular, West Square complements the Elliott's Row Conservation Area in terms of its form and scale, providing a positive historic experience to the significance of Elliott's Row. The glimpses of Elliott's Row from St George's Road provides long views of mansion blocks and terraced houses. These experiences of passing through the area or looking at it from outside the conservation area are positive and contribute to the significance of the conservation area.
271. The site itself is a three storey former industrial building. Its significance derives from its age, use and design. It contributes positively to the significance of Elliott's Row as a partial building of similar age and scale, but is now an outlier, differing from the buildings within the conservation area due to its form and placement facing St George's Road.

*Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate*

272. The loss of the existing buildings would harm, to a very minor extent, the significance of Elliott's Row as Castle Works themselves contribute positively



to the conservation area by age and scale of the buildings. The proposed development seeks to mark a transition point along St George's Road between the terraces of the western end of St George's Road and the Elephant and Castle town centre. The proposals would be highly visible and experienced in numerous views throughout the conservation area; however, the site, at the northern end of Elliott's Row, does follow a different pattern of development to those streets within the conservation area. The majority of the significance of the conservation area, its long terraces and mansion blocks, plus its scale and material, would be able to remain appreciated even with a large development at its northern end. In longer views and wider experiences, the conservation area would remain appreciable within the wider townscape of the existing and consented tall buildings at Elephant and Castle, of which the proposals would in the future form part. Therefore any harm to the significance of the conservation area is limited to the impact of a tall building in the northern parts of the conservation area and the abrupt change in scale at the junction of Elliott's Row and Oswin Street. This harm is considered to be minor, of a less than substantial nature.



*Image 33 (above): A rendered view of the proposed development, looking northwards along Oswin Street towards its junction with St George's Road.*

*Step 4: Explore ways to maximise enhancement and avoid or minimise harm*

273. During the pre-application process, officers sought to ensure that good design –in particular the height and scale of the buildings and the ground floor treatment– minimised impact on the conservation area. This pre-application negotiation included a reduction in the proposed tower's height to ensure it complemented the suite of tall buildings consented at the Elephant and Castle Shopping Centre site. Part of the Local Planning Authority's justification for seeking these height adjustments was the impact on the Elliott's Row Conservation Area.

274. The proposed active frontage along St George's Road, through its use of high quality materials and openings, would enhance this area, providing an entrance to the building which reinforces the character of St George's Road as a primary thoroughfare, leaving Elliott's Row as the historic network of residential streets. This has minimised the harm to the significance of Elliott's Row Conservation Area.

Step 5: Make and document the decision and monitor outcomes

275. A series of conditions requiring details of materials and landscaping to the street will assist in monitoring the future development quality.
276. With regards to Elliott's Row, there would be less than substantial harm to the significance of the designated heritage asset. In making the decision (or recommendation) public benefit, if demonstrated to be of the required quantity or quality, can outweigh this harm, as per para 202 of the NPPF.

West Square Conservation Area

Step 1: Identify which heritage assets and their settings are affected

277. The West Square Conservation Area is a notable example of high quality late Georgian and mid-19th century townscape, with a number of significant public buildings. These include the Imperial War Museum with its surrounding parkland, Geraldine Mary Harmsworth Park, and West Square itself, which is the centrepiece of the conservation area. St George's Roman Catholic Cathedral is another important building.



Image 34 (above): Example view from within the West Square Conservation Area

Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

278. The setting of West Square includes the suburban streets of Elliott's Row Conservation Area, the minor street of Brook Drive and the main thoroughfare of St George's Road. Elephant and Castle town centre, including the existing tall buildings of Elephant Park and those to the south, including Strata and One The Elephant, also form part of the setting of the asset. Planning consent has been granted for tall buildings within Elephant and Castle, including those at the LCC site, which would be visible from West Square gardens. Elliott's Row in particular, and St George's Road as a planned historic street lined with some remaining Georgian townhouses, add to the significance of the conservation area as part of a network of historic streets developed in the early years of the suburbanisation of south London. The tall building development at the LCC site

is part of the wider setting, and has a minor negative impact on the significance of West Square gardens owing to some of the taller buildings constructed and proposed being visible over the ridge line of the terraces, enclosing the square and breaking this historic experience of intimacy within the gardens.

*Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it*

279. The proposal would have some minor harm on the significance of the conservation area, by breaking the ridgeline of the eastern terrace of the square. However, it would be experienced as a tall building as part of the wider development of the Elephant and Castle, including the tall buildings consented at LCC. In comparison with those consented and developed, the building proposed by 22/AP/2838 would be of a smaller impact, and thus have very minor negative impact on the significance of the conservation area.



*Image 35 (above): A wireline view of the proposed development (dotted yellow line), taken from West Square Gardens facing southeastwards towards the Elephant and Castle town centre.*



*Image 36 (above): A wireline view of the proposed development (dotted yellow line) with cumulatives (pink line), taken from West Square Gardens.*

*Step 4: Explore ways to maximise enhancement and avoid or minimise harm*

280. Through the course of the pre-application discussions with the applicant, officers negotiated a smaller scheme to that originally presented. The proposals as presented by this planning application are the product of those pre-application discussions. This has the outcome of a smaller impact on the conservation area, seeking to minimise harm in this regard.

Step 5: Make and document the decision and monitor outcomes

281. A series of conditions requiring details of materials and landscaping to the street will assist in monitoring the future development quality.
282. With regards to West Square Conservation Area, there would be less than substantial harm to the significance of the designated heritage asset. In making the decision (or recommendation) public benefit, if demonstrated to be of the required quantity or quality, can outweigh this harm, as per para 202 of the NPPF.

Other heritage assets affected

Metro Central Heights (grade II)

283. This grade II listed complex designed by Erno Goldfinger was originally offices, being converted to residential prior to listing in the early 2000s. Its significance lies its architectural design and details as a good example of late Brutalist design by a notable architect. Its setting is highly urban with numerous tall buildings and the major junction at Elephant and Castle. The proposals may be experienced within the medium views of the asset; however, they would only contribute to the urban grain of the area and in this regard the impact on Metro Central Height's significance would be neutral.

Michael Faraday Memorial (grade II)

284. The significance of the memorial is as a (former) working transformer station for TfL (or its predecessor) and memorial to Michael Faraday. Designed in the 1950s, its striking form is part of its significance and its location, at a highly visible junction, is both purposeful and practical. Its setting, part of the Elephant and Castle junction has been improved in recent years with landscaping and reconfiguration of the peninsula. Its wider setting again is highly urban and includes tall buildings and large civic and educational buildings. The proposals may be experienced within the medium views of the asset; however, they would only contribute to the urban grain of the area and in this regard, the impact on the building's significance would be neutral.



*Image 37 (above): A rendered view looking eastwards from the Elephant and Castle peninsula, showing the proposed development in the context of the consented LCC towers, in the foreground of which (bottom left hand corner of image) is the Michael Faraday Memorial.*

#### Metropolitan Tabernacle (grade II)

285. Constructed in 1898, the church has a classical frontage in stone with modern offices behind, added in the post WWII era. The façade is reconstructed; however, it forms an important point in the street and perambulation of Elephant and Castle, as a cultural hub. Its setting is highly urban with numerous tall buildings and the major junction at Elephant and Castle. The site would be hidden behind the LCC buildings (existing and proposed) and the asset would only be experienced in moving through the area. Thus, there would be no impact on the setting of the asset.

#### Conclusion of heritage impact

286. In conclusion, if the public benefits of the scheme outweigh the minor harm to the significance of the Elliott's Row Conservation Area and the West Square Conservation Area, then the proposals would meet the requirements of chapter 16 (Conserving and enhancing the historic environment) of the NPPF, and the requirements of P19 (Listed buildings and structures) and P20 (Conservation Areas) of the Southwark Plan 2022. The loss of the existing building would be substantial harm to an undesignated heritage asset, however a balanced judgement should be made in this regards as per para 203 of the NPPF.

#### Design Review Panel

287. The proposed development was considered by the Council's Design Review Panel at the pre-application stage on 15th December 2020. Their full comments are attached as Appendix 6. In summary the Panel were optimistic but cautious about the proposal. While they felt that the design held promise in its scalloped design and rhomboid form, they expressed concerns about the building's feasibility because of the constrained nature of the site and limited

accommodation for back-up and support spaces. The Panel encouraged the early involvement of a hotel/co-working operator and a fire strategy to inform the building control principles for the design in order to better define how the building will be used and serviced in the long term. They also felt the proposal lacked a degree of ambition in terms of sustainability. Finally, the Panel questioned the proposed height and requested more details about the landscape and detailed architectural design.

288. The applicant team responded positively to the DRP comments, reassessing the landscaping and developing the sustainability strategy. The changes included 'softening' the interface between the building and the pocket park by introducing green walling and reducing the amount of glazing on the lower storeys, the latter action helping to reduce the opportunity for direct overlooking. The applicant has agreed a set of planning obligations with officers in relation to the pocket park, including a planting enhancement contribution and mitigation for construction-related impacts. The applicant team has also progressed the elevational treatment, refining the designs for the fins and the arrangement of the picture windows. The Energy Strategy submitted with the application demonstrates on-site carbon savings in excess of 60% (as detailed in the 'Energy and Sustainability' section of this report) as well as policy-complaint Circular Economy and Whole Life Cycle strategies. Officers are satisfied with the adjustments made.

### Inclusive access

289. Policy D3 of the London Plan 2021 states that measures to design out crime should be integral to development proposals and be considered early in the design process. Developments should ensure good natural surveillance, clear sight lines, appropriate lighting, and logical and well-used routes. Policy P16 of the Southwark Plan 2022 reinforces this and states that development must provide clear and uniform signage that helps people wayfind and effective street lighting to illuminate the public realm.
290. The applicant's inclusive design statement sets out the various inclusive access measures. These include:
- all surfaces at a gentle gradient and surfaced in slip-resistant treatments;
  - all uses to have step-free access through the provision of ramped or lift arrangements;
  - cycle storage provision to allow for larger cycles such as cargo cycles, purpose built cycles for disabled people and tricycles; and
  - signage to be clear, legible and consistent.
291. The proposal is ambitious in its inclusive design principles creating a convenient and welcoming building and new public spaces that can be entered, used and exited safely, easily and with dignity for all.

### Designing-out crime

292. Policy D11 of the London Plan 2021 and Policy P16 of the Southwark Plan require development proposals to reduce opportunities for crime and create and maintain safe internal and external environments.
293. Mentioned throughout the application documents are the various ways in which opportunities for crime have been designed-out. Examples include:
- creating well lit routes with good sight lines, creating opportunities for natural surveillance in so doing;
  - designing-out alcoves, secluded areas and other spaces for anti-social behaviour;
  - installing CCTV and intruder detection systems within the building;
  - installing access-controlled doors to eliminate the risk of individual gaining unauthorised access from the demise of one use into the demise of another; and
  - designing the cycle store room to be open-plan, well-surveilled and secure.
294. The Metropolitan Police's Secure by Design Officer has assessed the proposal and is confident that certification can be attained. To ensure certification is ultimately achieved, the imposition of a two-part 'Secured by Design' condition is recommended.

### Conclusion on design

295. This is a carefully conceived scheme which would provide an engaging building of an appropriately urban character. The modulation of the massing –whereby the taller element would be located on the northern portion of the site– would protect surrounding properties from amenity harm.
296. The height of the proposal has been the focus of a number of the objections to this application, with respondents commenting that the fifteen storey height of the tower would be overbearing and inappropriate. While the height exceeds that of the buildings immediately to the west, the application site marks a point of transition to the much more urban scale of the Major Town Centre. The position of the building has been carefully tested in the townscape views and it is concluded that it would neither appear overly dominant nor harm important aspects of the local townscape character. Overall, the height, scale and massing of the proposed building can be accommodated without undue harm to the established townscape.
297. In terms of architectural treatment, the proposed ensemble of GRC, cream-coloured brick and Corten is supported, as these are robust and high quality finishes. Sample materials and mock panels to ensure high quality execution will be required by condition.
298. Having applied the statutory tests as set out in the Planning (Listed Buildings and Conservation Areas) Act 1990 and the requirements of the NPPF, the public benefits of the scheme outweigh the minor harm to the significance of the Elliott's Row Conservation Area and the West Square Conservation Area.

While the loss of the existing building would constitute substantial harm to an undesignated heritage asset, a balanced judgement has been made having regard to the benefits of the scheme.

299. Inclusive design and crime minimisation considerations have all been resolved to an acceptable level of detail.
300. For the reasons given above, it is considered that an acceptable quality of design would be achieved.

### **Public realm, landscaping and trees**

301. London Plan Policy G7 and Southwark Plan Policy P61 recognise the importance of retaining and planting new trees wherever possible within new developments. London Plan Policy G5 requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

#### Public realm and landscaping on the application site

302. The application proposes no soft planting on-site, with the exception of living walls on part of the proposed building. This green walling would be installed at first and second floor level, on the west elevations and parts of the south and east elevations.
303. A member of the public has raised the concern that green walling systems are very expensive to maintain. Although green wall systems typically entail more upkeep and care than green roofs, they are commonplace in London and many maintenance contractors provide competitively-priced services. Through planning conditions, the developer will be required to install the walling to the agreed specification and maintain it in the long-term. Its enduring positive contribution to the greening of the site and the adjacent pocket park can, therefore, be assured.





*Image 38 (above): Partial west elevation of the proposed building, showing the extent of green walling at first and second floor levels.*

304. In terms of hard landscaping, two strips of public realm are proposed along the building's Oswin Street and St George's Road frontages. These would expand the existing footways. These new areas of public realm would be finished in materials consistent with the adopted footway so that the ownership line would be imperceptible. Some of the public objections to the planning application have asserted that the quantum of proposed public realm is inadequate given the scale of the scheme and/or the pre-existing short supply of open public space in the local area. However, and as mentioned in the 'Design' section of this report, the public realm offer is considered to be commensurate with the scale of the building, taking account of the other benefits the redevelopment of the site would bring.
305. It is also important to recognise that, due to its ground floor configuration, the building itself would enhance the public realm environment of St George's Road as follows:
- extensive glazing to the proposed restaurant/café unit would create an active and attractive street frontage in place of the railings and less engaging frontage of the existing building, which is set back behind a light well;
  - the new building line would be set back, with the existing site boundary railings removed in order to widen the pavement to St George's Road, thereby providing increased pedestrian comfort;
  - the proposed micro retail unit would provide a shop front adjacent to the pocket park, animating the street, while also decluttering the St George's Road pavement.

#### Public realm and landscaping at the pocket park

306. The application site abuts the Elliott's Row Pocket Park. This local public space has a small scale and intimate character. Any new building of height on the application site has the potential to dominate the pocket park. The interface between the proposed building and the park is, therefore, important.
307. As outlined in the 'Public consultation' part of this report, wide-ranging concerns were raised by respondents about the proposal's impact on the pocket park. Matters specific to the impact on the landscaping of this public space were:
- the proposal would affect the existing planting and landscaping within the pocket park, constraining its ability to grow or causing it to die altogether;
  - the proposal would cause any new planting and landscaping within the pocket park to fail; and
  - the proposal would necessitate cordoning-off part of the pocket park during construction, thus rendering it unusable by the public.

308. Having reviewed the application documents, the Council's Urban Forester is satisfied that there is minimal risk of the planting failing, either during the demolition/construction phase or post completion of the building itself. Notwithstanding, a Public Realm Bond will be secured through the Section 106 Agreement as a precautionary measure. If the planting remains healthy two years post occupancy of the building, the monies will be refunded to the developer. Otherwise, all or a necessary proportion of the bonded sum will be retained by the Council and used to fund repair/replacement of:
- any hard landscaping that is damaged as a consequence of the build; and/or
  - any planting that is found to be dead, dying, severely damaged or diseased in the period up until 2 years from first occupation of the development.
309. The applicant originally proposed to fund the planting of four Robinia trees within the pocket park; however, the custodians declined this because they considered tree planting to be unsuitable given the park's relatively small size. As an alternative, the applicant has offered a 'Long-Term Enhancement Fund' equivalent to the cost of buying and planting four Robinias (£12,678.60), which the custodians will be able to draw down in instalments to fund soft and hard landscaping improvement works to the pocket park.
310. Accompanying the planning application is a Construction Method Statement specific to the interface between the site and the pocket park. This sets out how the demolition and construction phases will be undertaken to minimise the impact on the pocket park. It shows that a 1.4 metre wide strip of the pocket park along the common boundary would need to be fenced off throughout the build programme (estimated to be approximately 3 years and 3 months). This "hoarded zone" is needed to accommodate scaffolding, all of which would be sheeted throughout demolition and construction. These preparatory works would require managed access to the park over a few days, including bringing a mini excavator or forklift into the park. Access to the "hoarded zone" thereafter would be from the construction site side, leaving the remainder of the park (approximately 85% of its total area) available for public use. Comments from members of the public about the reduction in the park's useable area, and the potential loss of its recreational appeal, are recognised. To mitigate these impacts, a sum of £19,760 will be secured through the Section 106 Agreement to fund the provision of temporary under-5s play within the vicinity for the duration of the construction phase. The format and location of this additional local play provision will be at discretion of the Council's Parks and Leisure Team.
311. The final matter for consideration is the more general concern raised by the public comments that the tall building would be of an excessive and unneighbourly scale and proximity to the pocket park, giving rise to a sense of encroachment and reducing the park's appeal as a local green space. As discussed in earlier parts of this report, the proposal addresses matters of overshadowing and overlooking sensitively. Furthermore, the proposed greening of the building's parkside elevation is welcomed for its softening effect,

and for helping reduce any sense encroachment on and ownership over the park. A final benefit would be the Long-Term Enhancement Fund, which would support the ongoing maintenance and improvement of this community green space.

312. On account of all of the above, it is considered that the application offers sufficient mitigation for the impact (both in terms of the construction phase and the as-built structure) on the pocket park, and would also invest adequately in its longer-term success as a public realm asset for the local community. This is in accordance with London Plan Policy G7 and Southwark Plan Policy P61.

### Trees

313. There are presently no trees on the site. The application does not propose to introduce any new trees, given the lack of space available within the relatively modest site boundary for accommodating specimens that could grow to a reasonable degree of maturity. The on-site greening and suite of mitigation for the pocket park are considered adequate such that the non-provision of new tree planting is acceptable.

## **Green infrastructure, ecology and biodiversity**

### Urban greening

314. Policy G5 of the London Plan 2021 states that urban greening should be a fundamental element of site and building design. It requires major developments that are predominantly residential to achieve an Urban Greening Factor (UGF) score of 0.4 and those that are predominantly commercial to achieve a score of 0.3. The scheme proposed by 21/AP/2838 falls within the latter category.
315. With extensive natural cover surface, the proposal would achieve an urban greening factor of 0.40 (rounded up). This would be achieved through a combination of:
- 135 square metres of extensive biodiverse roof, distributed across four of the five roofs:
  - 30 square metres of blue roof, located on the lowest roof of the base/plinth building; and
  - 125 square metres of green walls on the building's east, south and west elevations.
316. The score of 0.4 would exceed the minimum policy requirement of 0.3, and as such should be treated as a benefit of the scheme. A two-part condition will be imposed to ensure the development is built-out to achieve the 0.40 UGF.

### Ecology and biodiversity

317. The protection and enhancement of opportunities for biodiversity is a material planning consideration. London Plan Policy G6 requires development proposals

to manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process. Southwark Plan Policy P60 seeks to enhance populations of protected species and increase biodiversity net gains by requiring developments to include features such as green and brown roofs, green walls, soft landscaping and nest boxes.

318. Some representations from members of the public have raised concerns about the potential negative effect of the proposal on local wildlife.
319. The Council's Ecologist has reviewed the application information and deemed the proposal to be satisfactory. The site was found to have low existing ecological value in an area of natural deficiency. The Ecologist welcomed the biodiversity net gain and provision of urban greening, recommending conditions to secure the provision of eighteen Swift bricks within the building fabric to support local biodiversity.

## **Archaeology**

320. The Council's archaeologist has considered the proposal. They noted that the site is of a small scale in plan, not within an Archaeological Priority Area, and has been previously extensively developed. Accordingly, they have advised that no archaeological assessment, fieldwork or conditions are required should planning permission be granted.

## **Transport and highways**

### Trip generation

321. Policy T4 of the London Plan 2021 requires development proposals to ensure the impacts on the capacity of the transport network are fully assessed and that any adverse impacts are mitigated. Policies P45, P49 and P50 of the Southwark Plan require developments to minimise the demand for private car journeys and demonstrate the public transport network has sufficient capacity to support any increase in the number of journeys by the users of the development.
322. The trips associated with the proposed hotel, office and retail uses would predominantly be by sustainable travel modes including on public transport, by bicycle and on foot. The Council's Transport Policy Team predicts the proposed development would generate 10 two-way net additional vehicle movements in the morning peak hours and 7 in the evening peak hours; these numbers are similar to those predicted by the applicant's consultant. When offset against the six (AM peak) and eight (PM peak) two-way vehicle movements for the existing office/retail use of this building, there would be four additional and one fewer two-way vehicle movements in the morning and evening peak hours respectively. The Transport Policy Team is comfortable that these levels of vehicular traffic would not have any noticeable adverse impact on the local highway network, especially in light of the mitigation measures the applicant has proposed in their Travel Plan.

323. Visitors to the site would likely use sustainable modes, given the lack of on-site car parking, the various public transport options in the area, cycle links and cycle parking. The applicant has proposed a range of travel plan initiatives including the appointment of a site-wide travel plan co-ordinator, the provision of cycling facilities, furnishing users of the development with travel information, and committing to monitoring. With regard specifically to the hotel element, staff would be trained to ensure that visitors/guests are advised to travel by modes other than the private car wherever possible. Similar information would be available on the hotel website. Where travel by private car is required for disabled use, guests would be able to use the on-site disabled parking space.
324. A condition requiring a Final Travel Plan and Transport Methods Survey would be secured by condition to ensure the measures outlined in the draft document are implemented and promoted.

### Taxi pick-ups and drop-offs

325. With regard specifically to taxi activity in connection with the proposed hotel use, the Council's Transport Policy Team estimates that the hotel would generate 40 taxi movements per day. In the PM peak hour, it is estimated that there would be two taxi arrivals and two taxi departures, with a reduced demand at all other times. No more than two taxis are expected to be at the site at any one time. When dropping-off or picking-up, taxis would be able to either:
- dwell briefly on Oswin Street on the single yellow line; or
  - wait within the proposed 12 metre long partly inset servicing layby on Oswin Street (as long as service vehicles are not occupying the space).
326. The servicing layby is only expected to be occupied for 11%-12.5% of the day and therefore would provide sufficient capacity to accommodate the predicted taxi activity. The applicant's Operational Management Plan outlines a set of sound measures to prevent taxis from stacking, and a final version of this will be required by condition.

### Coach pick-ups and drop-offs

327. The nearest dedicated coach bay is located on Blackfriars Road approximately 1.15km north of the site. The hotel would not contain any large scale conferencing facilities or event spaces, and the food and beverage offer would not be conducive to catering for large coach tours or groups in general. As such, the Operational Management Plan obliges the hotel operator to market itself as a destination unsuitable for coach parties. The Operational Management Plan states that "if group bookings are absolutely necessary / unavoidable, guests will be advised to utilise smaller vehicles such as a people carrier / minibus as an alternative which can utilise the lay-by on Oswin Street". These principles are considered acceptable.
328. A final Operational Management Plan will be required by condition, the detail of which can be informed once a hotel operator is on board.

### Servicing and deliveries

329. London Plan Policy T7 deals with servicing and delivery arrangements during construction and end use. With respect to end use, the policy requires provision of adequate space for servicing, storage and deliveries to be made off-street, with on-street loading bays only used where this is not possible.

#### Servicing/delivery trip generation

330. The applicant's Transport Assessment predicts the proposal would generate 9 deliveries, which equates to 18 two-way service vehicle trips per day. The Council's Transport Policy Team agrees that these estimates are realistic and would neither place undue strain on the highway network nor impact upon the amenity of nearby residential occupiers.

#### Servicing/delivery facilities and vehicle routing

331. Loading and unloading would be undertaken from a proposed partly-inset 12 metre long servicing layby along the building's Oswin Street frontage. The provision of this layby has been made possible by setting back the proposed building line, the intention being to enable better visibility when a servicing vehicle is attending the site, allowing traffic to continue to pass safely along Oswin Street.
332. Concerns have been raised by members of the public that the servicing strategy is inadequate. More specifically, some respondents argued that the servicing of the site would harmfully impact the smooth flow of traffic along Oswin Street. To overcome this concern, one objector suggested that a fully inset layby is needed. Vehicle tracking diagrams have been produced by the applicant, showing that the largest type of vehicle to service the site (a refuse truck) would be able to manoeuvre along Oswin Street, pull into the layby, pull out of it, and emerge onto St George's Road in a single forward gear movement. When occupying the layby, this vehicle would be sufficiently set-in from the centre line of the carriageway to ensure visibility for competing traffic flows wishing to use the stretch of Oswin Street carriageway immediately beside the layby.



Image 39 (above): Tracking diagram of a refuse vehicle negotiating the cycle shelter on Oswin Street.



Image 40 (above): Tracking diagram of the left-turn manoeuvre from Oswin Street into St George's Road.

333. In terms of routing, because St George's Road is one-way, all vehicles servicing the site would make their approach westbound along St George's Road from the peninsula. Owing to the proposed partly inset layby being located on the western side of Oswin Street, vehicles would not be able to make a left-turn off St George's Road to access the site. Instead, they would be expected to approach the site westbound along St George's Road, turning left into Hayles Street and following it to its southern end, before looping back onto Oswin Street via Brook Drive. When leaving the site, servicing vehicles would rejoin St George's Road and follow the A23 southwards to the A3204.

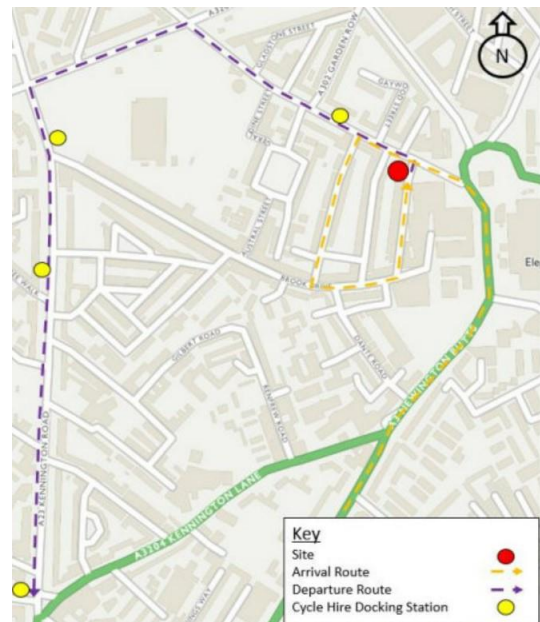


Image 41 (above): Proposed service vehicle routing to and from the site.

334. While some respondents to the public consultation felt that it was inappropriate to allow vehicles servicing the site to be routed along Brook Drive and Hayles Street, the Transport Policy Team is satisfied that the routing represents the most direct route to/from the strategic highway network while also having the least impact, as it would avoid the cycle superhighway on Elliott's Row. When

taken together with the relatively low number of predicted servicing trips, the Team concluded that there would be no harm to residential amenity.

### Servicing/delivery hours

335. Servicing hours to all of the uses would be restricted by condition, as follows:

- 09:00 to 20:00 on Monday to Fridays;
- 09:00 to 18:00 on Saturdays; and
- 10:00 to 16:00 on Sundays.

336. An additional allowance would be carved out of the above hours to permit a maximum of two deliveries to each use (hotel, office, restaurant/cafe) between the 'early morning' hours of 6am and 8am. These 'early morning' deliveries must be made by vehicles no larger than a 7.5t box van / 8 metre vehicle. The early morning deliveries allowance was sought by the applicant to enable deliveries of baked goods, fresh food supplies etc. The Transport Policy Team are comfortable with this arrangement, given the limitations on vehicle size and trip numbers.

### Conclusion on servicing/deliveries

337. The proposed servicing arrangements, with appropriate routing of inbound and outbound vehicles, as well as limitations on delivery hours, are supported by the Council's Transport Policy and Highways Development Management Teams.

338. The submission and approval of a standalone Final Delivery and Servicing Management Plan (DSP) is to be required by condition. This should be based on the principles established by the outline version submitted with the application, and the operation of the building thereafter will need to be in accordance with the approved Final DSP. As a precautionary measure, a Delivery and Servicing Management Bond will be secured so that adherence to the Final DSP and highways impacts can be monitored over the course of the first two years of operation.

### Refuse storage arrangements

339. To store the combined volumes refuse produced by the uses, a dedicated room is proposed at ground floor level. To be located off the integral parking bay, the room would be easily accessible for all four uses. The applicant's DSP includes calculations of the volumes of refuse the development will generate. To cater for this, four 1,100 litre refuse bins, four 1,100 litre recyclables bins and one 240 litre wheeled bin for food waste would be needed. Plans have been provided demonstrating that the refuse store has been sized to accommodate these refuse receptacles, with sufficient manoeuvring and circulation space factored-in.

340. The Final DSP required by condition would include refuse collection arrangements to be submitted to and approved by the Local Planning Authority.



### Car parking

341. Policy T6 of the London Plan requires developments in locations with existing and future high public transport accessibility to be car-free, save for adequate parking for disabled people. Specific requirements for different uses are set out in Policy T6.1 through to Policy T6.4, while Policy T6.5 deals with non-residential disabled persons parking.
342. Southwark Plan Policy P54 (Car Parking) echoes the London Plan 2021, promoting car-free development in zones with good public transport accessibility. It requires car-free non-residential proposals in CAZ locations, and for any disabled parking to be provided on-site and supported by EVCPs.
343. The Controlled Parking Zone in place in this location provides adequate daytime parking control in this vicinity. The proposed development would be car free except for one off-street disabled space accessed from Oswin Street. The space would be managed by security and reception staff at the shared hotel/office reception. Given the site's location and high PTAL rating this is an acceptable approach. An electric vehicle charging point should be provided for the disabled bay, and this will be required by condition.

### Cycle parking

344. London Plan Policy T5 sets minimum cycle parking standards for different uses. Southwark Plan Policy P53 sets out a higher requirement than the London Plan standards.
345. The table below summarises the minimum cycle parking required by the Southwark Plan, alongside the provision proposed by this application:

<b><u>Cycle parking minimum policy requirements vs provision</u></b>				
<b><u>Land use</u></b>	<b><u>Long-stay spaces</u></b>		<b><u>Short-stay spaces</u></b>	
	<b>Requirement</b>	<b>Provision</b>	<b>Requirement</b>	<b>Provision</b>
Hotel	5	5	2	2
Office	16	16	3	3
Retail	2	2	7	8
<b>Total</b>	<b>23</b>	<b>23</b>	<b>12</b>	<b>13</b>

346. As the table above shows, the proposal would meet the minimum requirement of 23 long-stay spaces. These would be housed within a shared cycle store, with the mix of formats as follows:
- 11 two-tier racks (22 spaces); and

- two larger spaces to cater for accessible/ non-standard cycles, equating to 8.3% of the total required spaces, which exceeds the minimum 5% requirement as set out in London Cycle Design Standards (LCDS).
347. End-of-journey cycle facilities for employees of the site would include a WC and a disabled WC, but no showering facilities. This is considered acceptable given the scale of the development. The lift to the proposed basement level would be in accordance with LCDS standards, with two doors required to pass through to access the cycle store.
348. With regard to the proposed short-stay (visitor) provision, as the table above shows, the minimum requirement would be met. It is proposed to install the short-day stands for retail visitors on the central segregation island (between the cycleway and the vehicular carriageway) on St George's Road directly to the north of the application site. The island accommodates 3 existing Sheffield stands (6 spaces). All of the proposed short-stay spaces would also be in a Sheffield stand format. An indicative drawing has been provided by the applicant's transport consultant to demonstrate that the island is large enough to accommodate the additional stands. The installation of the stands will be secured through the Section 278 Agreement the applicant must enter into with TfL; to bind the applicant to this, an obligation will be included in the Section 106 requiring said Agreement to include the delivery of the stands.
349. In summary, the total number and format of cycle spaces complies with the minimum requirements of the London Plan and Southwark Plan, with the details indicating:
- the short stay facilities would be in a fit-for-purpose format and appropriately located; and
  - all long stay cycle parking would be secure, covered, practically arranged and conveniently located.

### Improving access to cycle hire options

350. Given that the town centre is a key destination and the development would introduce up to 64.5 new FTE employees to the site as well as up to 178 hotel guests when all rooms are occupied, the applicant has agreed to contribute £70,000 towards investment in the monitoring and management of TfL (Santander) docking stations within the vicinity of the site. To be secured in the Section 106 Agreement, this contribution would meet the requirements of Policy T5 of the London Plan 2021 and Policy P53 (Cycling) of the Southwark Plan.

### Legible London signage

351. The applicant has agreed, at the request of TfL, to make a contribution of £13,000 towards providing new and refreshed Legible London signage. This will be secured in the Section 106 Agreement.

### Healthy Streets

352. London Plan Policy T2 requires development proposals to demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance.

353. Some ways in which the proposal would support the ten indicators are:

- It would be car free save for one managed wheelchair parking space, thus promoting walking, cycling and use of public transport;
- It would provide investment in sustainable transport facilities and services to commensurately mitigate the impact on existing infrastructure;
- it would enhance public realm around the site as well as within the surrounding network of streets; and
- it has been designed to minimise air and noise pollution.

354. The Active Travel Audit submitted by the applicant identified that level, good quality footway provision is the largest barrier to active travel within the vicinity of the site. The audit identified that, within the local area, there is a need for widening of footways to enable better access for wheelchair users and providing tactile paving at vehicle crossovers to assist the visually impaired.

355. In accordance with Healthy Streets and having had regard to the findings of the applicant's Active Travel Audit, the Transport Policy Team has sought various contributions from the applicant towards a range of highway safety measures together with improvements to pedestrian/cycle routes in the vicinity of this development. The specific set of works is detailed in the 'Planning Obligations: Summary Table' in a later part of this report.

### Relationship with the Bakerloo Line Extension

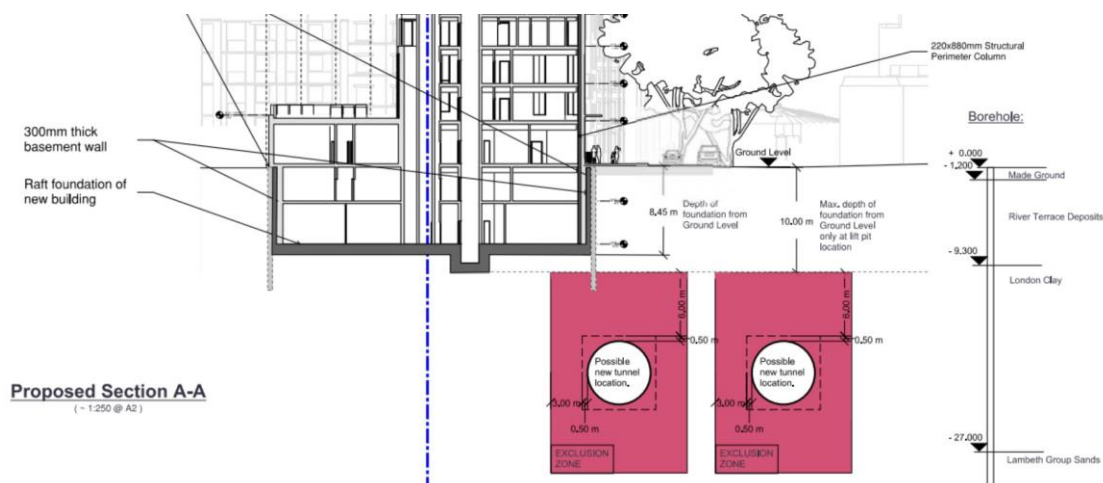
356. The site is in the safeguarded area of the potential Bakerloo Line Extension (BLE) promoted by Transport for London. In accordance with BLE safeguarding directions and TfL guidance, a Structural Engineering Conceptual Design Submission (SECDS) accompanies the planning application. Produced by Price and Myers, the purpose of this document is to demonstrate that:

- the deliverability of the BLE would not be prejudiced by the proposed building; and
- the proposed structure would not be adversely affected to an unacceptable degree by the construction or operation of the BLE.

### Safeguarding the delivery of the BLE

357. With respect to the requirement not to prejudice the delivery of the BLE, the SECDS tests various scenarios for the tunnel alignment. In a worst-case scenario, one or both tunnels would be aligned under the site. In this scenario, the secant piled retaining wall required for the construction of the basement would need to extend into the exclusion zone by approximately 1.3 metres. The SECDS states "the secant piled wall will not need to support significant vertical loading and so the stresses on the surrounding soil within the exclusion zone

will be minimal". TfL has reviewed the SECDS and is satisfied that the proposal would not compromise the delivery of the BLE.



*Image 42 (above): Cross-section demonstrating the interaction between the foundations of the proposed development and the BLE safeguarding zone.*

#### Safeguarding the proposed building from BLE construction-related impacts

358. The construction of the proposed 21 St George's Road development is likely to precede the delivery of the BLE. The SECDS includes an assessment of this scenario, concluding that the construction of the BLE tunnels would have minimal impact on the building, falling within the "Category 0" grade of the Burland damage classification system, which indicates negligible impact. TfL has reviewed the SECDS and is satisfied that the design of the building has taken account of the future running tunnels so as to ensure no construction-related impacts would arise.

#### Safeguarding the proposed building from BLE operational impact

359. Noting that the application site is located very close to the proposed route of the BLE running tunnels, a member of the public has objected to the proposal on the grounds that the interior accommodation would be subject to re-radiated noise and vibration from railway activity. The objector asserts that this would create poor quality hotel, office and retail environments.
360. The SEDCS concludes that "the predicted levels of re-radiated noise are lower than the proposed criterion [stipulated by TfL] and therefore no vibration mitigation measures are necessary for the proposed development". As such, there is no reason to conclude that the proposed development would experience injurious transport-related noise and vibration effects.

#### Transport summary

361. Having considered all transport and traffic related implications, the Council's Highways, Transport and Waste Management Teams are satisfied with the proposal. The scheme would minimise vehicle movements by prioritising use of public transport, walking and cycling, and by encouraging consolidation of

deliveries. Its relationship with the BLE has been tested in accordance with the requirements of the safeguarding directions, and TfL is satisfied that the delivery of the BLE would not prejudice the construction of the proposed development and vice-versa.

## **Environmental matters**

### Construction management

362. Some public representations have raised concerns that construction activities will generate noise, dust, traffic and associated pollution. The applicant has submitted an Outline Environmental Construction Management Plan explaining how construction activities will be managed to minimise neighbour amenity, environmental and highway network impacts. This document has been reviewed by the relevant transport and environment consultees, who have deemed it to be satisfactory as a framework document.
363. In order to ensure that increases in traffic, noise and dust associated with the demolition and construction phases of the development are minimised, a Final Construction Environmental Management Plan and a Construction Logistics Plan are to be required by condition.

### Flood risk, resilience and safety

364. The site is in Flood Zone 3 and is located within an area benefitting from flood defences. The applicant's Flood Risk Assessment sets out that the site is at low risk of groundwater flooding and very low risk of surface water flooding. The Environment Agency has reviewed the applicant's Flood Risk Assessment and considers it to be acceptable.
365. In terms of flood resilience and safety, the applicant's Flood Risk Assessment recognises that, while the proposed basement would be above the measured level of groundwater, groundwater levels may rise in the future; to mitigate the risk of groundwater ingress, the basement would be tanked and a cavity drainage system installed. No concerns have been raised by the Council's Flood Risk Management Team to the flood risk mitigation measures as set out in the applicant's Flood Risk Assessment. Compliance with the mitigation and resilience measures will be secured by way of a condition.

### Sustainable urban drainage


366. The applicant's Drainage Strategy, which is contained within the applicant's Flood Risk Assessment and proposes that surface water flows would be attenuated through the use of a blue roof system complemented by a flow control, has been deemed satisfactory by the Council's Flood Risk Management Team. A condition is recommended requiring compliance with the proposed drainage strategy.

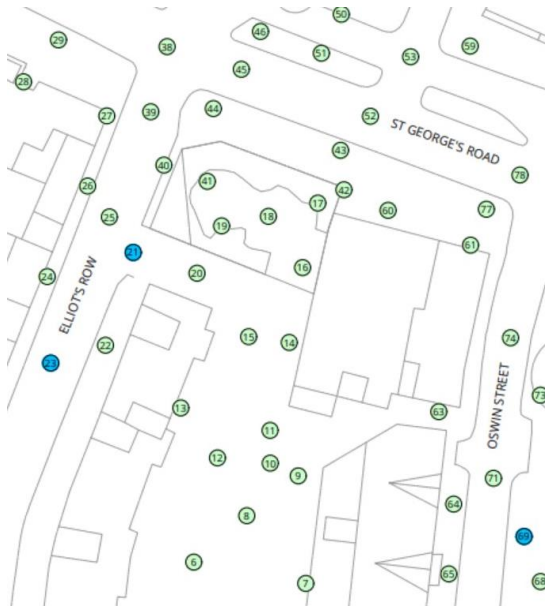
### Land contamination

367. The application was accompanied by a preliminary Land Contamination Risk Assessment, which the Council's Environmental Protection Team has assessed and deemed acceptable. A condition is to be imposed requiring a Phase 2 investigation to be conducted and the results submitted to the council for approval, with further remediation measures to apply if contamination is found to be present.

### Wind microclimate

368. London Plan Policy D9 requires all tall building proposals not to cause changes to the wind environment that would compromise comfort and the enjoyment of open spaces around the building and in the neighbourhood. Southwark Plan Policies P14 and P56 require wind effects to be taken into consideration by the Local Planning Authority when determining planning applications, as does Policy P17 where the proposal is a tall building.
369. Public consultation responses raised objections to the effects of the proposal building on the local microclimate, including a number concerned specifically about the impact on the pocket park.
370. The tower element of the proposed building has been modelled to minimise any potential effects from the prevailing south-westerly winds. Chamfered corners, facade texture, canopies and soft landscaping have been incorporated in order to mitigate any wind effects at street level.
371. The application is accompanied by a wind microclimate assessment which employed a wind tunnel-based assessment methodology. The results are expressed using the Lawson Criteria, which establishes four pedestrian activities (comfort categories) taking into account that less active pursuits require more benign wind conditions. The four categories are 'sitting', 'standing', 'strolling' and 'walking'. Wind of a magnitude that would cause a nuisance for most activities is categorised as 'uncomfortable'.
372. The applicant's assessment finds that the wind conditions around the site would remain suitable for the intended use at each location following the completion of the proposed development, including when taking into account cumulative schemes including the nearby LCC scheme. It also finds that there would be no safety exceedances as a result of the proposed development, again including in the cumulative scenario. The maps below depict the change in wind conditions as a result of the development during the windiest season (the winter months):

LDDC COMFORT CATEGORIES:		
Sitting		Strolling 
Standing		Walking 
		Uncomfortable 



*Image 43 (above): Wind effects map of the existing development with existing surrounding buildings and existing landscaping in the windiest season.*



*Image 44 (above): Wind effects map of the proposed development with existing surrounding buildings and existing landscaping in the windiest season.*

373. A number of representations made the same comment, as follows: “wind modelling shows 20% areas tested will be unsuitable for sitting upon completion during winter months”. This comment is referring to measurement location 19 in the above wind maps, the blue colour of which in the “proposed” scenario denotes that it would be suitable for standing but not sitting as a consequence of the proposed development. It is accepted that conditions may worsen in the winter when spaces are typically used for shorter periods rather than prolonged sitting. Furthermore, most of the park would still be suitable for sitting during these months. If the cumulative schemes are built-out, measurement location 19 would revert to being suitable for sitting, and by extension so too would the entire pocket park. On balance, it is not considered that the recreational function and value of the pocket park would be harmed by the change in wind conditions during the winter months.
374. One respondent objected on the grounds that the changes to the wind environment at rear of Oswin street and Hayles Buildings would cause problems for residents. It is noted that six measurement locations would, as a result of the development, change from being comfortable for ‘sitting’ in the windiest season to being comfortable for ‘standing’. However, the locations in question are within the driveway serving the Hayles Buildings parking area, and as such it is not considered that any uncomfortable environmental impacts would arise given that the use of this space is for predominantly non-sitting activities.
375. Given that in all scenarios the proposal would maintain a comfortable environment within the surrounding streets and pocket park, no mitigation is necessary. It can therefore be concluded that London Plan Policy D9 and Southwark Plan Policies P14, P17 and P56 have been met.

### Air quality

376. An Air Quality Assessment (AQA) was submitted with the application, which considers the air quality impacts arising from the construction and operational use of the development, taking into account all relevant local and national guidance and regulations
377. In terms of the construction phase, an Air Quality and Dust Management Plan appended to the CEMP sets out a range of mitigation. Proposed measures include locating machinery and dust causing activities away from receptors, enclosing activities with solid screens and barriers to prevent dust dispersion, using covered chutes and skips, and ensuring all on-road vehicles comply with the London Low Emission Zone requirements.
378. The proposed building itself would be all-electric (meaning there would be no on-site combustion), which mitigates air quality issues and facilitates significant advances towards zero carbon in future decades as the National Grid continues to decarbonise
379. The AQA concludes that, subject to the proposed mitigation measures, the effects on air quality during construction and operation are considered to be negligible. The Council's Environmental Protection Team has reviewed the AQA and raised no objection.

### Light pollution

380. Some of the objections to this planning application cited the potential light pollution the proposal would cause. During the applicant's own community engagement exercises carried out in March 2022, the same matter of light pollution was raised. Light pollution (both interior and exterior) from the scheme will be minimised through careful lighting design and compliance with the ILP Guidance notes for the reduction of obtrusive light (2011).
381. With respect to light pollution from interior sources, the applicant has agreed to apply treatments to a number of the windows (as detailed in the 'Overlooking' section of this report). The applicant has proposed this in direct response to the neighbours' light pollution concerns and other concerns regarding overlooking. The proposed treatments have proven Visible Light Transmission (VLT) qualities. It is considered that these measures would address part C.1)h) of London Plan Policy D9 on minimising light pollution from tall buildings.
382. With respect to light pollution from exterior sources, buildings close to existing residential uses are not typically fitted with external lighting above ground floor level. This is in the interests of residential amenity. The application drawings do not suggest an intention to install high level lighting on the facades of the proposed building. As such, no concerns are raised with regard to potential light pollution and light nuisance.
383. In summary, the proposal does not raise light pollution concerns in this central part of the borough, within the CAZ and town centre. Provision of the treated



glazing in the agreed locations will be secured by condition. The final external lighting proposals, including any pre-determined dim-down and turn-off times, will be agreed through the Final Lighting Strategy, to be approved by the Local Planning Authority prior to first occupation of the building, and again this will be secured by condition.

### Fire safety

384. 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.
385. A Fire Statement was submitted with the application. This contains a matrix which assesses the scheme for compliance against the relevant parts of Policy D12. Among other things, the Fire Compliance Statement:
- confirms that the building would be served by two stairs for means of escape and fire service operations;
  - proposes a “simultaneous evacuation strategy”;
  - commits to providing a firefighting shaft consisting of a firefighting stair which communicates with a ventilated firefighting lobby, a fire main, firefighting lift and evacuation lift;
  - commits to an appropriate active fire protection system including fire detection and alarm, emergency lighting and signage, sprinklers and smoke control systems;
  - explains that, in the case of an emergency, the evacuation lift would switch from its everyday use to becomes a tool only for the evacuation of persons with disabilities and is not considered a general escape route;
  - confirms compliance with Building Regulations Approved Document B; and
  - explains how the internal layout would achieve compliant travel distances.
386. The Fire Statement was produced by fire risk engineering consultancy Chapman BDSP. The contents of the document have been checked and approved by a certified fire risk engineer (a Member of the Institute of Fire Engineers).
387. As part of the GLA Stage I process, the Fire Statement was assessed and no issues were raised. The relevant fire risk minimisation policies of the London Plan are deemed to have been satisfied. A condition is recommended to ensure the construction and in-use operation of the building are carried out in accordance with the Fire Statement.

### **Energy and sustainability**

388. Chapter 9 of the London Plan deals with all aspects of sustainable infrastructure and identifies the reduction of carbon emissions as a key priority. Policy SI2

'Minimising Greenhouse Gas Emissions' requires all developments to be net zero carbon with a minimum on-site reduction of 35% against the Part L baseline for both commercial and residential uses. Non-residential development should achieve a 15% reduction in emissions through energy efficiency measures. Where developments are unable to meet net zero carbon targets any shortfall between the minimum 35% and zero carbon must be mitigated by way of a payment towards the carbon offset fund. New developments must follow the London Plan hierarchy (comprising 'be lean', 'be clean', 'be green' and 'be seen') and this must be demonstrated through the submission of an Energy Strategy with applications, as well as post construction monitoring for a period of 5 years.

389. Southwark Plan Policies P69 'Sustainability Standards' and P70 'Energy' reflect the approach of the London Plan by seeking to ensure that non-residential developments achieve a BREEAM rating of 'Excellent' and include measures to reduce the effects of overheating using the cooling hierarchy. The policies pursue the 'be lean', 'be clean', 'be green' principles of the London Plan, and require non-residential buildings to be zero carbon with an on-site reduction of at least 40% against the Part L baseline. Any shortfall must be addressed by way of a financial contribution towards the Council's carbon offset fund.

### Energy and carbon emission reduction

#### Be Lean

390. In terms of meeting the 'Be Lean' tier of the hierarchy, a range of passive and active measures are proposed. The passive measures include:

- Optimised glazing solution to reduce overheating risk and reliance on mechanical cooling;
- Window 'g' values of 0.4 to maximise beneficial solar gain in winter and limit excessive solar gain in summer;
- Potential for a mixed-mode ventilation strategy for the office spaces (to be confirmed based on the conclusions of the air quality and noise assessments).
- The use of exposed concrete slabs to provide high thermal mass to moderate the cooling loads;
- Low air permeability reduce leakage through the façade;
- High level of fabric performance across the whole development;
- Optimised glazing ratio to reduce solar gains whilst ensuring access to daylight.

391. The active measures include:

- The proposed lighting would be equipped with auto on / auto off presence detection and photocell dimming in perimeter zones;
- Low energy LED lighting would be specified throughout;

- For heating/cooling purposes, the hotel rooms and circulation spaces would be equipped with fancoil units, while mechanical ventilation with recirculation is proposed for the reception and plant rooms.

392. The reduction in carbon emissions achieved through these 'demand reduction' measures will only be 2% for the non-domestic element, falling short of the policy target of 15%. This is due largely to hotels having a very high hot water demand, which outweighs the passive savings made elsewhere

#### Be Clean

393. Within close proximity of the application site is a communal boiler, Gaywood Boiler Room, and a CHP site at Elephant and Castle Shopping Centre. However, it is understood both of these only have limited capacity and therefore it would not be viable for the 21 St George's Road development to connect to either. Moreover, the aim of the proposed scheme is to reduce dependency on fossil fuel-based technologies and the two nearby networks are dependent on gas infrastructure which is not being decarbonised as extensively as electricity.

394. As no immediate connection to a district heating network or on-site CHP system is proposed, no carbon savings are reported from the 'Be Clean' stage of the energy hierarchy.

395. Although connection to a district heating network cannot be proposed because an appropriate one does not exist in the vicinity at present, the potential for connection at a future time will be futureproofed. This requirement will be secured through the Section 106 Agreement.

#### Be Green

396. With respect to the 'Be Green' tier of the hierarchy, the applicant has proposed the following technologies:

- 60 photovoltaic panels on the roof
- a communal heating and cooling network served by a central energy centre, the latter being served by a reverse cycle ASHP.

397. On a side-wide basis, carbon emissions would be reduced by 59% through these 'Be Green' measures. The applicant has demonstrated that opportunities for renewable energy by producing, storing and using renewable energy on-site have been maximised.

#### Be Seen

398. Introduced as part of the London Plan 2021, 'Be Seen' is the newest addition to the GLA's energy hierarchy. It requires developments to predict, monitor, verify and improve their energy performance during end-use operation. All applications should conduct a detailed calculation of unregulated carbon emissions as part of the compliance with the 'Be Seen' policy and associated guidance.

399. The applicant's Energy Statement calculates that unregulated per annum energy emissions for the development would be 37.2 tonnes of carbon per annum.
400. The applicant's Energy Statement states that a suitable metering strategy will be implemented to record energy consumption and generation from the point at which the different uses within the development are occupied. It is recommended that the on-going requirements for monitoring energy consumption and generation, and the associated reporting to the GLA in line with policy, be secured through a planning obligation.

#### Total energy savings

401. 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.
402. The proposal would reduce on-site regulated carbon dioxide emissions by 61% over a notional building minimally compliant with the Building Regulations 2013, exceeding both the London Plan minimum (35%) and the Southwark Plan minimum (40%). The total per annum shortfall in savings relative to carbon zero would be 58.7 tonnes per year which, at a rate of £95/tonne for 30 years, generates an offset contribution of £167,295. This will be secured in the Section 106 Agreement, with a mechanism built-in to reduce the total sum proportionate to any improvements made to the regulated carbon emissions performance of the building up until practical constructed.
403. The energy savings, as detailed above, which take into account SAP10 and the decarbonisation of the electricity grid, demonstrate the good environmental and sustainability credentials of the proposed development.

#### Whole life cycle and carbon capture

404. London Plan Policy SI2 requires all major development proposals to be supported by a whole life cycle carbon assessment. This assesses the embodied and operational emissions associated with redevelopment.
405. 'Embodied carbon' is the term used to describe the carbon emissions associated with:
- extraction and manufacturing of materials and products;
  - in-use maintenance and replacement;
  - end of life demolition, disassembly and disposal; and
  - the transportation relating to all three.
406. 'Operational carbon' is the carbon dioxide associated with the in-use operation of the building. This usually includes carbon emissions associated with heating, hot water, cooling, ventilation and lighting systems, as well as those associated with cooking, equipment and lifts.

407. Driven by the aim of achieving net carbon zero for new development by closing the implementation gap, whole life cycle carbon assessments are monitored at the pre-application, submission and post-construction stages. Policy P70 of the Southwark Plan 2022 reinforces the need to calculate whole life cycle carbon emissions through a nationally recognised assessment and demonstrate actions taken to reduce life cycle carbon emissions.
408. The submitted whole life carbon assessment for the planning application considers the operational carbon and embodied carbon of the proposal throughout its life from construction, use and deconstruction. The assessment finds that over a 60-year study period, the development's operational and embodied load would be 750kgCO<sub>2</sub>/m<sup>2</sup>. The benchmark set by the GLA is 1,050kgCO<sub>2</sub>e/m<sup>2</sup> GIA, with an aspirational benchmark of 690 kgCO<sub>2</sub>e/m<sup>2</sup> GIA. As such, the WLC performance is considered acceptable. Two conditions to require two further stages of whole life-cycle carbon assessment in the detailed design and completion stages are proposed

### Circular Economy

409. Southwark Plan 2022 Policy P62 'Reducing Waste' states that a Circular Economy Statement should accompany planning applications referable to the Mayor. Circular economy principles include conserving resource, increasing efficiency, sourcing sustainably, designing to eliminate waste and managing waste sustainably at the highest value. London Plan policies GG5 'Growing a Good Economy', D3 'Growth Locations in the Wider South East and beyond' and SI7 'Reducing Waste' all mention circular economy principles and the benefits of transitioning to a circular economy as part of the aim for London to be a zero-carbon city by 2050.
410. A detailed Circular Economy Statement was submitted with the application, which sets out strategic approaches, specific commitments and the overall implementation approach.
411. The strategic approaches for the development include:
- maximising the reuse of demolition material, ensuring any elements from the demolition that cannot be reused on site will be sent to organisations for onward reuse;
  - undertaking passive design studies to reduce the operational energy of the building;
  - adopting lean design principles;
  - specifying materials responsibly and sustainably;
  - designing the "building layers" with shorter life expectancy (less than 25 years) for ease of maintenance, reuse and recoverability; and
  - providing adequate waste storage space and maximising recycling opportunities.
412. Specific targets committed to by the applicant include:

- diverting at least 95% of the waste from going into landfill or for incineration;
- formed from recycled content at least 25% of the building structure and at least 10% of the shell/skin;
- ensuring the contractor prepares and implements a Site Waste and Resource Management Plan (SWMP/RMP).

413. The proposal would achieve a building circularity score of 30%. The construction of the building would use 11.1% of its materials as recovered (i.e. renewable or from recycled sources), and when deconstructed at the end of its life 49.3% of its materials could be recycled, downcycled or used for energy.

#### Building Circularity Calculation (based on the mass of the building)

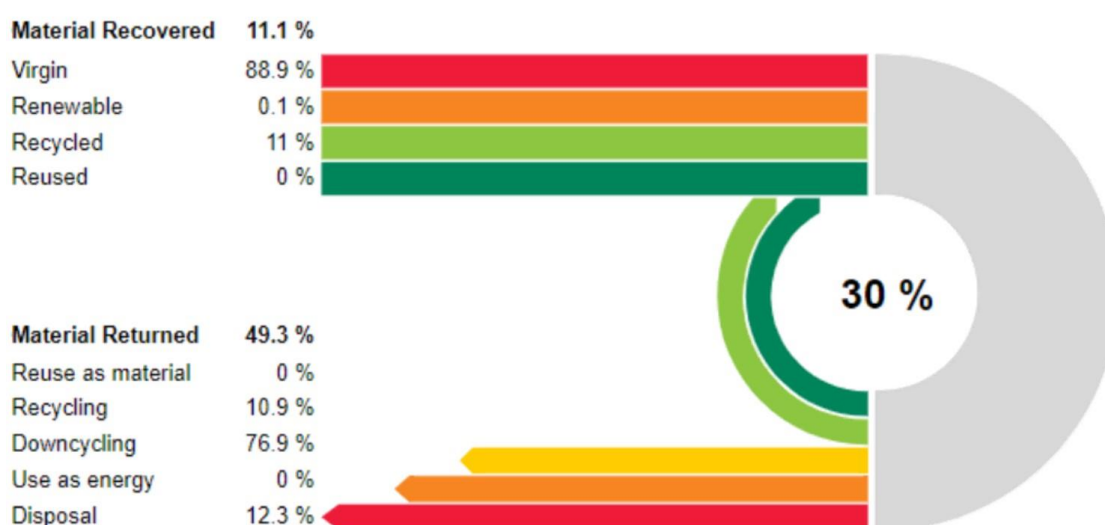


Image 45 (above): The building circularity score of the proposed development.

414. The application has addressed the requirements of London Plan Policy SI7 'Reducing Waste and Supporting the Circular Economy', Southwark Plan Policy P62 'Reducing Waste', and had reference to the GLA's guidance in producing the Circular Economy Statement. Conditions are proposed to require a final version of the Circular Economy Statement, and post-completion reporting. Subject to these conditions, the proposal is considered to comply with the sustainable materials element of Policy P17 'Tall Buildings'.

#### Overheating and cooling

415. London Plan Policy SI4 'Managing Heat Risk' requires major development proposals to demonstrate how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy. Policy P69 'Sustainability Standards' of the Southwark Plan 2022 states that development must reduce the risk of overheating, taking into account climate change predictions over the lifetime of the development, in accordance with the cooling hierarchy.

416. The six-step hierarchy that should be followed when developing a cooling strategy for new buildings 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).

#### Minimise internal heat generation

417. Internal heat generation is to be minimised through low energy lighting (to reduce lighting gains), the hot water supply from the ASHP being at a low temperature (thus reducing the risk of significant heat losses), and applying insulation to the communal pipework to avoid distribution losses.

#### Reduce heat entering the building

418. The heat entering the proposed development is to be reduced by a combination of measures. These include locating the building cores on the south façade of the building, using high-albedo facade and paving materials, achieving a low 'U' (thermal transfer) value facade, improving air tightness throughout the building, achieving a high- performance 'G' value double-glazed curtain wall system, and the use of external shading devices to reduce solar gain.

419. Blinds were not included in the assessment as the scheme is a shell and core development. Blinds could be investigated as part of the fit-out design to provide an additional measure to reduce excessive solar gain in the hotel rooms.

#### Manage the heat within the building

420. Generous to floor to floor heights would be achieved and the building fabric would be left exposed where possible.

#### Use passive ventilation

421. A passive natural ventilation strategy –whereby cooling would be achieved at least in part through openable windows– was reviewed by the applicant but precluded by noise and air quality issues arising from the proximity of St George's Road. However, the scheme does incorporate trickle vents operational at night, which may provide a degree (albeit very limited) of background ventilation. As such, and as detailed below, active systems would be needed to manage heat within the building.

#### Use mechanical ventilation

422. The development will incorporate mechanical ventilation (with heat recovery). This system will provide additional ventilation to suppress the internal temperature as much as possible. This reduces the cooling demand because it

avoids --or at least delays for as long as possible-- a breach of the maximum operational temperature, at which point the active cooling system would kick in.

#### Use active cooling systems (low carbon)

423. While the cooling hierarchy set out above would significantly reduce the need for cooling, the steps taken would not be sufficient to avoid overheating risk throughout the year in the proposed development. As such, active cooling would be required in the form of highly efficient low carbon air source heat pumps, as well as variable speed pumps for circulating chilled water to suit the variable levels of demand.

#### Summary

424. Following the cooling hierarchy, the applicant has demonstrated that the cooling demand has been reduced to less than the Part L 2013 Baseline (Notional) building. Active cooling is proposed for the development because natural ventilation alone would not be sufficient to guarantee the occupiers' and users' comfort, in line with the criteria set out in CIBSE TM 52 and TM 59 guidance. With the proposed measures taken into account, the annual cooling load of the hotel rooms would be improved by 42%, enhancing the overall building efficiency. This is considered to be in compliance with London Plan Policy SI4 'Managing Heat Risk' and Southwark Plan Policy P69 'Sustainability Standards'.

#### BREEAM

425. Policy P69 'Sustainability Standards' of the Southwark Plan 2022 states that development must achieve a BREEAM rating of 'Excellent' for non-residential development. The applicant's BREEAM indicates 'Excellent' can be achieved, and a planning condition is recommended to secure this.

#### Water efficiency

426. The Sustainability Strategy submitted by the applicant confirms that the proposed development aims to minimise water consumption such that the BREEAM excellent standard for the 'Wat 01' water category would be achieved, as required by London Plan Policy SI5. This will be achieved through the specification of features such as:

- water-efficient sanitary fittings,
- flow control devices that regulate the supply of water to each WC area/facility according to demand;
- main and sub metres each having a pulsed output (to enable connection to appropriate utility monitoring and management system);
- a major leak detection system will be installed;
- a water efficient irrigation strategy ("automated sub-surface irrigation") for the proposed landscaping features.



## Digital connectivity infrastructure

427. The NPPF recognises the need to support high-quality communications infrastructure for sustainable economic growth and to enhance the provision of local community facilities and services.
428. To ensure London's long-term global competitiveness, Policy SI6 (Digital Connectivity Infrastructure) of the London Plan 2021 requires development proposals to:
- be equipped with sufficient ducting space for full fibre connectivity infrastructure;
  - achieve internet speeds of 1GB/s for all end users, through full fibre connectivity or an equivalent.
  - meet expected demand for mobile connectivity; and
  - avoid reducing mobile capacity in the local area.
429. The applicant has confirmed in writing that the development would have the incoming duct arrangements to suit the provisions from the local networks, and that by the time construction works are underway 1GB/s fibre should be available. The level of information submitted demonstrates that digital connectivity has been adequately considered at the planning stage, meeting the requirements of Policy SI6. A compliance condition is recommended, requiring the development to be constructed in accordance with the infrastructure plans.

## Socio-economic impacts

430. London Plan Policy E11 requires development proposals to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases. This requirement is also covered by Policy P28 of the Southwark Plan, with the methodology for securing these opportunities prescribed by the Council's Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015 with 2020 Update)
431. In accordance with the policy framework, there would be a requirement for this development to deliver training and employment during the operational phase only. 11 sustained jobs for unemployed Southwark Residents would be required, to be filled by the applicant in accordance with a Post-Completion Employment, Skills And Business Support Plan. These obligations will be secured through the Section 106 Agreement.
432. In terms of direct employment, the proposed uplift in office floorspace has the potential to deliver up to 64.5 extra FTE positions, the hotel has the potential to deliver up to 30 new FTE positions and the restaurant/café unit has the potential to create up to 8 new FTE positions. The maximum FTE additionality from the site would, therefore, be 102.5 jobs. The workers would also generate spend in shops and services in the local area, which is an enduring benefit of the development.

## Planning obligations

433. London Plan Policy DF1 and Southwark Plan Policy IP3 advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. These policies are reinforced by the Section 106 Planning Obligations 2015 SPD, which sets out in detail the type of development that qualifies for planning obligations. The NPPF echoes the Community Infrastructure Levy Regulation 122 which requires obligations to be:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development

434. In accordance with the Section 106 Planning Obligations and CIL SPD, the following contributions have been agreed with the applicant in order to mitigate the impacts of the development:

<b>Planning Obligations: Summary Table</b>	
<b><u>Obligation</u></b>	<b><u>Mitigation / Terms</u></b>
<b>Community use of the office meeting rooms</b>	
ELIGIBLE USERS AND RENTAL RATES	<p>Throughout the lifetime of the development, the two basement-level office meeting rooms are to be made available on an hourly/slot basis at zero cost to community users in accordance with a Management Plan.</p> <p>Eligible community users shall be community groups, not for profit and cultural projects using the facility for non-profit making purposes.</p> <p>The owner shall be responsible for absorbing all costs associated with the operation of the three spaces, including utilities and cleaning costs, and maintaining the spaces in good running order internally.</p> <p>Applicant's Position: <b>Agreed.</b></p>
MANAGEMENT PLAN	<p>No later than three months prior to occupation of the office floorspace, the developer shall submit a Community Use Management Plan to the Council for its approval. This Plan shall include:</p> <ul style="list-style-type: none"> <li>- the minimum number hours for which the office meeting rooms will be available for community use per week (which shall be no less than 10 hours per week and restricted to Community Use Hours);</li> </ul>

	<ul style="list-style-type: none"> <li>- details of the persons appointed to manage and operate the office meeting rooms during community use hours;</li> <li>- details of the booking system (who will be responsible for managing it, how community and/or non profit-making status of customers will be verified, how popular or high value slots will be managed so as to prevent regular block booking etc.);</li> <li>- the platforms through which the office meeting rooms availability for community use would be marketed, together with details of the frequency/duration of marketing;</li> <li>- Code of conduct for the use of the meeting space, and any agreements required in order to enable occupation (e.g. for insurance reasons); and</li> <li>- such other matters as the Council and the developer may reasonably agree should be included in the Community Use Management Plan.</li> </ul> <p>The developer shall implement and comply with the Community Use Management Plan (or such revised plan as may be agreed between the parties in writing from time to time) for the duration that the office meeting rooms are retained.</p> <p>The developer shall maintain ongoing records of:</p> <ul style="list-style-type: none"> <li>- all bookings which have taken place, the names of the community users, the date and time of the booking and the type of event held; and</li> <li>- any bookings by community users cancelled by the owner, or any refusals to take bookings by the owner, including a record of the circumstances in which such cancellations and refusals occurred and the names of the community users involved;</li> </ul> <p>and shall make these records available to the Council upon reasonable request provided this shall not be required more than two times in any calendar year, and subject to compliance with all data protection requirements.</p> <p>Applicant's Position: <b>Agreed.</b></p>
<b>Local Economy: Employment and Training</b>	
POST-COMPLETION (IN-USE) PHASE	<p>The development is to deliver <b>11 sustained jobs</b> to unemployed Southwark residents,</p> <ul style="list-style-type: none"> <li>- Any shortfall is to be met through the End Use Shortfall Contribution which, at maximum, would be</li> </ul>

JOBS AND TRAINING	<p><b>£47,300.</b> This is calculated on the basis of £4,300 per job.</p> <p>Applicant's Position: <b>Agreed.</b></p>
POST-COMPLETION (IN-USE) PHASE EMPLOYMENT, SKILLS AND BUSINESS SUPPORT PLAN	<p>Produce and submit for approval a Post-Completion Employment, Skills And Business Support Plan, detailing:</p> <ul style="list-style-type: none"> <li>- Methodology for filling the Sustained Employment Opportunities (SEOs) and apprenticeships roles</li> <li>- Milestones and profiles for filling the SEOs and apprenticeships</li> <li>- Identified skills and training gaps to gain sustained employment in the completed development</li> <li>- Methods to encourage applications from suitable unemployed Borough residents by liaising with the local Jobcentre Plus and employment service providers.</li> </ul> <p>Applicant's Position: <b>Agreed.</b></p>
<b>Local Economy: Affordable Workspace</b>	
QUANTUM AND LOCATION	<p>The dedicated affordable workspace is to comprise:</p> <ul style="list-style-type: none"> <li>- c.72 sq.m GIA based on 10% of overall office floorspace, with specific location to be confirmed by submission to the Council; and</li> <li>- the associated communal/circulation spaces.</li> </ul> <p>All ancillary and servicing areas are to be available to the relevant affordable workspace occupants on the same terms/basis as the market office occupiers.</p> <p>Applicant's Position: <b>Agreed.</b></p>
LIFETIME AND RENT LEVELS	<p>The affordable workspace is to be provided for a fixed term commencing upon first operation of the affordable workspace unit in question and terminating no sooner than 30 years (without unnecessary interruption) thereafter.</p> <p>Rental levels of the affordable workspace are to be:</p> <ul style="list-style-type: none"> <li>- 0-11 months at <b>peppercorn rent</b>;</li> <li>- 12 months until the end of the affordable workspace lifetime at no more than <b>75% of Local Open Market Rent</b>;</li> </ul>

	<p>(excluding any rates and reasonable service and building management charges) (Indexed Linked from date of Agreement) per square foot net lettable area per annum.</p> <p>The rental levels referred to above are to be routinely offered to all new tenants throughout the lifetime of the affordable workspace, not just the initial tenant(s).</p> <p>The Local Open Market Rent is to be determined by a commissioned valuer and submitted to the Council for approval. This process shall include a dispute resolution mechanism.</p>	
TENANT ELIGIBILITY	<p>Applicant's Position: <b>Agreed.</b></p> <p>Eligible tenants are to be, as per the definition given in the NSP, from a specific sector that has a social, cultural or economic development purpose. This would include:</p> <ul style="list-style-type: none"> <li>- charities, public health services, voluntary and community organisations or social enterprises;</li> <li>- creative and artists' workspace;</li> <li>- rehearsal and performance space and makerspace;</li> <li>- occupiers for disadvantaged groups starting up in any sector;</li> <li>- occupiers in support of educational outcomes through connections to schools, colleges or higher education;</li> <li>- existing businesses in Southwark who need to relocate;</li> <li>- small businesses located in Southwark; and</li> <li>- start-ups or small businesses otherwise identified by the workspace provider to be agreed with the council.</li> </ul> <p>Priority must be given to pre-existing organisations based within the borough.</p> <p>The Affordable Workspace Provider is to retain discretion over the selection of the eligible tenants that take leases within the affordable workspace areas.</p> <p>Applicant's Position: <b>Agreed.</b></p>	
KEY TERMS OF LEASE	Rent Review	Five yearly, RPI linked.
	Service charges	£4.00 sq/ft lettable area (index linked).
	Break clause	<p>For both the landlord and the tenant:</p> <ul style="list-style-type: none"> <li>• a 2 year break on a 5 year lease;</li> <li>• a 1 year break on a 2 year lease.</li> </ul>

	Applicant's Position: <b>Agreed</b>
MINIMUM SPECIFICATION OF UNIT(S)	<p>Prior to occupancy, all affordable workspace is to be provided to the Council's minimum specification. It prescribes the standards of:</p> <ul style="list-style-type: none"> <li>- Fit-out (floor, ceiling, windows, doors, power, lighting etc.) specification at point of occupancy</li> <li>- Telecommunications</li> <li>- Means of escape</li> <li>- Lifts</li> <li>- Delivery/servicing arrangements</li> <li>- Cycle Storage</li> <li>- Regulations (DDA etc.) compliance</li> </ul>
	Applicant's Position: <b>Agreed.</b>
MARKETING & MANAGEMENT PLAN	<p>Six months prior to practical completion of the affordable workspace, applicant is to submit an Affordable Workspace Marketing and Management Plan.</p> <p>In the event that the developer decides not to manage the day-to-day operation of the workspace, a Workspace Provider is to be appointed to fulfil this role and shall do so in accordance with the approved Affordable Workspace Marketing and Management Plan.</p>
	Applicant's Position: <b>Agreed.</b>
<b>Local Economy: Relocation or suspension of kiosk retailer during construction</b>	
TEMPORARY RELOCATION/ SUSPENSION PLAN	<p>In circumstances where the vacating and/or removal of the kiosk is necessary to enable demolition and/or any other specific phase of construction works to commence, prior to any demolition and construction works commencing on site the applicant is to submit a Kiosk Temporary Relocation/Suspension Plan. The Kiosk Temporary Relocation/Suspension Plan shall detail:</p> <ul style="list-style-type: none"> <li>• In the event that the developer has secured an alternative pitch location within Elephant and Castle for occupation by Nandine for the full duration of the construction phase of the development: <ul style="list-style-type: none"> <li>- the location of the pitch;</li> <li>- the associated agreement with the landowner;</li> <li>- confirmation that the pitch rate and any service charges will be no higher than the current rates and</li> </ul> </li> </ul>

	<p>charges paid by Nandine (developer to absorb differential costs if necessary);</p> <ul style="list-style-type: none"> <li>- timeframe for relocation;</li> <li>- details of marketing support from the developer i.e. signage at development site advertising the address of the new pitch; and</li> <li>- any financial or other business support from the developer to assist in the relocation process.</li> </ul> <ul style="list-style-type: none"> <li>• In the event that the developer is unable to secure an alternative pitch location within Elephant and Castle for occupation by Nandine throughout the construction phase of the development: <ul style="list-style-type: none"> <li>- evidence of research and enquiries made by the developer to seek out potential alternative pitch locations, supported by a detailed written statement explaining why these efforts were unsuccessful;</li> <li>- the mutually-agreed financial compensation to be paid to Nandine to offset the loss of income throughout the construction phase of the development resulting from the kiosk's suspension, to include: <ul style="list-style-type: none"> <li>i. detailed calculations based on the operator's averaged profits from the past 3 years, or other valuation methodology agreed upon by all parties;</li> <li>ii. the arbitration process (full costs to be paid by the developer) used to resolve valuation disputes;</li> <li>iii. dates/triggers for when these sums will be paid by the developer to the kiosk operator; and</li> </ul> </li> <li>- timeframes for giving notice to Nandine to vacate their existing pitch.</li> </ul> </li> </ul> <p>In addition to the above, irrespective of whether the kiosk is ultimately relocated or suspended, the Kiosk Temporary Relocation/Suspension Plan is to:</p> <ul style="list-style-type: none"> <li>• detail the engagement undertaken by the developer with the Council's Markets and Street Trading Division to agree on the compensation to be paid to Southwark Council to offset the loss of income arising from the inoperation of the pitch throughout the construction phase of the development; and</li> <li>• confirm the agreed financial compensation, and the process/dates/triggers for making the payment(s) to the Council's Markets and Street Trading Division (which for the current financial year [2022/2023] would be based on £312 per month, or part thereof, of inoperation).</li> </ul>
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	<p>The actions within the agreed Kiosk Temporary Relocation/Suspension Plan, including payment of all financial sums, are to be carried out by developer by the agreed trigger points.</p>	
	<p>Applicant's Position: <b>Agreed.</b></p>	
<p><b>Local Economy: Affordable Micro Retail Unit</b></p>		
QUANTUM AND LOCATION	<p>The micro retail unit is to comprise the ground floor dedicated sales area and the associated WC (together totalling 20.7 sq.m GIA), with access to a shared lobby / fire exit (providing lobby access to only the kiosk).</p> <p>Tenants of the micro retail unit are to have unencumbered rights of access along the stretch of fire escape corridor that connects the St George's Road entrance door to the kiosk's internal entrance door.</p>	
	<p>Applicant's Position: <b>Agreed.</b></p>	
LIFETIME AND RENT LEVELS	<p>The micro retail unit is to be provided for a fixed term commencing upon first operation of the unit and terminating no sooner than 10 years (without interruption) thereafter irrespective of occupier churn.</p> <p>The rental level of the micro retail unit is to be capped at <b>£300/month</b> (excluding any rates and reasonable service and building management charges), to be adjusted in April of each year to match the rate applied to the '<i>OTHER LOCATIONS – Prime Sites; Elephant and Castle; Licensed Traders</i>' pitch category contained within Southwark Council's annually-published '<i>Markets and Street Trading Fees and Charges</i>'</p> <p>The rental level referred to above is to be offered to each new tenant throughout the lifetime of the micro retail unit, not just the initial tenant.</p>	
	<p>Applicant's Position: <b>Agreed.</b></p>	
KEY TERMS OF LEASE	Rent Review	<p>Yearly, to be adjusted in line with Southwark Council's annually-published '<i>Markets and Street Trading Fees and Charges</i>', including in the event of a downward adjustment to the pitch rate.</p>



	Break clause	<p>For both the landlord and the tenant:</p> <ul style="list-style-type: none"> <li>• a 2 year break on a 5 year lease;</li> <li>• a 1 year break on a 2 year lease.</li> </ul>
TENANT ELIGIBILITY AND SELECTION PROCESS	<p>Applicant's Position: <b>Agreed.</b></p> <p>Eligible tenants are to be Nandine (as occupier of the existing kiosk and on the basis of vacating the existing kiosk), or an existing, independently-owned retail businesses, traders, kiosk holders, restaurants, and market stall holders who do not trade from more than 3 locations and currently operate (at least one of their outlets) from a site within the Elephant and Castle Major Town Centre.</p> <p>Where no prospective tenant meeting the above criteria expresses an interest in the micro retail unit at the time it is available for tenancy, the eligibility criteria is to be widened to existing, independently-owned retail businesses, traders, kiosk holders, restaurants, and market stall holders who do not trade from more than 3 locations and currently operate (at least one of their outlets) from a site within the borough of Southwark.</p> <p>The selection process is to be undertaken by the developer in liaison with the Council's Markets and Street Trading Division and the Council's Local Economy Team.</p> <p>The developer is to consider nominations for occupation of the micro retail unit from the Council and shall provide the Council with a written summary of reasons where a nominee put forward by the Council has been declined.</p> <p>The selection process shall not be concluded nor shall any tenancy be agreed until formal written agreement of the suitability of the tenant has been issued by the two aforementioned Council divisions.</p> <p>Applicant's Position: <b>Agreed.</b></p>	
DELIVERY AND SIGN-OFF	<p>Prior to the occupancy of the micro retail unit, the developer is to:</p> <ul style="list-style-type: none"> <li>- at its own expense, have constructed and completed in shell form the micro retail unit, to include a shop front and service heads (gas, electricity and water) but for the avoidance of doubt, the developer shall not be obliged to fully fit out;</li> <li>- have submitted to the Council evidence of the completed micro retail unit; and</li> </ul>	

	<ul style="list-style-type: none"> <li>- have received written confirmation from the Council that the submitted evidence is satisfactory.</li> </ul>
	Applicant's Position: <b>Agreed</b>
FIRST RIGHT OF REFUSAL	Nandine to be offered first right of refusal (limited offer for up to three months from practical completion).
	Applicant's Position: <b>Agreed.</b>
TENANT APPROVAL PROCESS	In the event that a tenant other than Nandine is identified for the micro retail unit, the developer shall provide to the Council the details of the new tenant and evidence that the agreed rental terms are consistent with those prescribed above.
	Applicant's Position: <b>Agreed.</b>
<b>Transport Impacts Mitigation</b>	
TfL DOCKING STATION CONTRIBUTION	The developer is to contribute <b>£70,000</b> (index-linked) towards expansion of the TfL cycle docking station scheme in the vicinity of the site
	Applicant's Position: <b>Agreed</b>
LEGIBLE LONDON SIGNAGE	The developer is to contribute <b>£13,000</b> (index-linked) towards provision of Legible London signage on the site and within the vicinity.
	Applicant's Position: <b>Agreed.</b>
ELECTRICITY AND COMMS CABINETS RELOCATION	The developer is, through liaison with the relevant utilities operators, to undertake reasonable endeavours to seek to ensure the relocation of all the existing electricity/communications cabinets along the site's St George's Road boundary to an alternative nearby location where they will cause less of an obstruction to the public realm and footway traffic.
	Applicant's Position: <b>Agreed.</b>
DELIVERY AND SERVICING	For a period of two years from opening of the hotel the daily vehicular servicing activity of the site is to be monitored and returns made on a quarterly basis. If the site meets or betters its own baseline target the Delivery and Servicing Management Bond will be returned within 6 months of the

MANAGEMENT BOND	<p>end of the monitoring period. If the site fails to meet its own baseline the bonded sum will be made available for the Council to utilise for sustainable transport projects in the ward of the development.</p> <p>The Bond will be <b>£2,967</b>, calculated on the basis of the GFA of commercial floorspace.</p> <p>The Bond is to be paid to the Council prior to occupation of any part of the development.</p> <p>The Council will retain £1,600 of the £2,967 Bond for assessing the quarterly monitoring. This means the refundable sum will be £1,367.</p> <p>Applicant's Position: <b>Agreed.</b></p>
BLUE BADGE RESTRICTION	<p>The one parking space within the loading bay shall be reserved exclusively for Blue Badge holders.</p> <p>Prospective occupiers/employees of all uses (the market and affordable commercial floorspace, the market and affordable retail floorspace, and the hotel) shall be notified that the parking space will be prohibited from use except by Blue Badge holders. This notification shall be provided in the material used for marketing and the terms of all leases.</p> <p>Applicant's Position: <b>Agreed.</b></p>
<b>Highway Impacts Mitigation</b>	
BOROUGH NETWORK: SCOPE OF S278 WORKS	<p>Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer is to submit the Section 278 specification, detailed design and estimated costs to the Local Highways Authority for approval. This shall comprise the following works, and all shall be constructed in accordance with SSDM standards:</p> <ul style="list-style-type: none"> <li>- Repave the footway including new kerbing fronting the development on Oswin Street;</li> <li>- Reconstruct the footway on the western section of Oswin Street;</li> <li>- Increase footway width on Oswin Street to 2.4m, including behind inset bay (achieved by setting back building line as per proposed drawings);</li> <li>- Offer for adoption the footway on Oswin Street formed by the set back of the building;</li> <li>- Reconstruct and shorten the raised table on Oswin Street from the junction with St George's Road to the agreed length;</li> </ul>

	<ul style="list-style-type: none"> <li>- Construct a partially inset layby along the Oswin Street frontage, commencing from the end of the shortened raised table;</li> <li>- Promote the necessary Traffic Regulation Orders (TMOs) to enable loading to take place in the inset layby at times to be agreed;</li> <li>- Reconstruct the existing vehicle crossover on Oswin Street;</li> <li>- Refresh road markings following kerb installation and reconstruction of raised table;</li> <li>- Change all utility covers on Oswin Street to recessed type covers;</li> <li>- If deemed necessary in the interest of safety or pedestrian comfort, to relocate (to new locations in accordance with approved drawings) the three following existing footway items: <ul style="list-style-type: none"> <li>- the lamp column at the corner of St George's Road and Oswin Street;</li> <li>- the illuminated sign post; and</li> <li>- the post on the west side of Oswin Street with speed limit signs;</li> </ul> </li> <li>- Install any existing and proposed signs fronting the development on the building's wall (if possible) in order to improve effective footway widths;</li> <li>- Rectify any damaged footways, kerbs, inspection covers and street furniture within the vicinity of the development due to the construction of the development (including construction work and the movement of construction vehicles).</li> </ul>
	Applicant's Position: <b>Agreed.</b>
BOROUGH NETWORK: S278 AGREEMENT DEADLINE	<p>Prior to commencement of the agreed highway works, the developer is to enter into a Highway Agreement under Section 278 (and Section 38).</p> <p>Applicant's Position: <b>Agreed.</b></p>
BOROUGH NETWORK: S278 DELIVERY	<p>All works agreed under the Highway Agreement shall be completed within the agreed timeframe.</p> <p>Applicant's Position: <b>Agreed.</b></p>
STRATEGIC NETWORK:	<p>Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer is to submit the Section 278 specification, detailed design and estimated costs to TfL for approval, with all works to be constructed in accordance</p>

SCOPE OF S278 WORKS	<p>with the applicable regulating plan and materials palette. This shall comprise at least the following works:</p> <ul style="list-style-type: none"> <li>- Renew and upgrade the kerb and footway along St George's Road adjacent to the development;</li> <li>- Reduce and/or relocate the number of lighting and signage columns on the footway along St George's Road adjacent to the development, in order to improve effective footway widths; and</li> <li>- Install short-stay cycle stands (to be Sheffield format) on the segregated island immediately to the north of the site on St George's Road.</li> </ul> <p>The developer is also to secure Technical Approval from TfL Structures Team for the proposed excavation works adjacent to the highway in connection with the construction of the basement.</p> <p>The developer is, within 6 weeks of the date of completion to each, to submit evidence to the Council of:</p> <ul style="list-style-type: none"> <li>- the Section 278 Agreement; and</li> <li>- the Approval in Principle from the TfL's Structures Team.</li> </ul>
Applicant's Position: <b>Agreed.</b>	
<b>Publicly-accessible open space</b>	
DETAILED DESIGN	<p>Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer is to submit a Specification for all areas of privately-owned publicly-accessible open space to the Local Planning Authority and receive its approval. The Specification shall demonstrate that the publicly-accessible open space has been designed to an adoptable standard (in accordance with the SSDM) and shall comprise:</p> <ul style="list-style-type: none"> <li>- detailed drawings (plans, sections, levels etc.);</li> <li>- details of street furniture (cycle stands, seating, bollards etc.);</li> <li>- details of planting;</li> <li>- details of external lighting and CCTV;</li> <li>- details of boundary enclosure and entry gates;</li> <li>- finishes schedules and samples of proposed materials;</li> <li>- demonstration that principles of Secured by Design have been incorporated; and</li> <li>- details of the phasing and timing for delivery.</li> </ul>
Applicant's Position: <b>Agreed.</b>	

DELIVERY AND SHORT-TERM MANAGEMENT	<p>Upon receipt of a Provisional Completion Certificate from the Local Planning Authority, the developer shall make the publicly-accessible open space available to the public (in accordance with the access hours and permitted rights of closure).</p> <p>Any defects within the first 12 months of opening are to be rectified by the developer.</p> <p>At the end of the initial 12 month period, the developer is to seek and receive from the Local Planning Authority a Final Completion Certificate.</p> <p>Applicant's Position: <b>Agreed.</b></p>
LONG-TERM MANAGEMENT	<p>The developer covenants to manage, maintain and allow public access to the publicly-accessible open space except for a limited period in certain circumstances (fire, flood, carrying out of essential maintenance etc.).</p> <p>Applicant's Position: <b>Agreed.</b></p>
HOURS OF ACCESS	<p>The publicly-accessible open space shall be open 24 hours a day every day of the week including Bank Holidays save for Force Majeure and permitted closures/suspensions.</p> <p>Applicant's Position: <b>Agreed.</b></p>
RIGHTS OF CLOSURE	<p>The developer shall be entitled to close the publicly-accessible realm (with prior notification to members of the public) for up to one day per year so as to prevent public rights of way being obtained.</p> <p>Applicant's Position: <b>Agreed.</b></p>
<b>Off-site Public Open Space Mitigation</b>	
PROTECTION OF THE HARD AND SOFT LANDSCAPING WITHIN THE POCKET PARK	<p>Prior to any demolition and construction works, the developer shall commission an Independent Audit and Valuation of the existing planting and hard landscaping in the pocket park (cataloguing all the planting/landscaping on-site and their values), and receive the LPA's approval of this.</p> <p>The Independent Audit and Valuation shall be saved on file by the Council.</p> <p>Over the course of the monitoring period (a period of 5 years from first occupation of the development), any</p>

	<p>planting/landscaping that requires replacement shall be paid for by the developer and replaced in liaison with the Urban Forester, with costs to be index-linked from those in the independent audit and valuation.</p> <p>Prior to any demolition and construction works, the Council will shall be paid a non-refundable monitoring fee to fund the Urban Forester's work in connection with monitoring the status of the Pocket Park landscaping.</p>
	<p>Applicant's Position: <b>Agreed.</b></p>
MITIGATION OF CONSTRUCTION PHASE IMPACT	<p>Prior to any demolition and construction works, a sum of <b>£19,760</b> (index linked) is to be paid to the Council to fund the provision of under-5s play within the vicinity for the duration of the construction phase, the format and location of which shall be fully at the discretion of the Parks and Leisure Team.</p>
	<p>Applicant's Position: <b>Agreed.</b></p>
POCKET PARK LONG-TERM ENHANCEMENT FUND	<p>Prior to any demolition and construction works, a sum of <b>£12,678.60</b> (index linked) (equivalent to the cost of buying and planting four immature Robinia trees) is to be paid to the Council.</p> <p>This Pocket Park Long-Term Enhancement Fund shall be disbursed to the custodians upon receipt of a Park Enhancement Proposal deemed acceptable to the Council. The Park Enhancement Proposal shall describe the proposed enhancement(s) to the park, the costings for said enhancement(s) and evidence of advanced procurement.</p> <p>The Pocket Park Enhancement Fund shall be disbursed in one or more stages, until fully disbursed.</p> <p>The Pocket Park Enhancement Fund shall only be available for disbursement applications from the custodians once the period of 5 years following first occupation of the development has elapsed.</p>
	<p>Applicant's Position: <b>Agreed.</b></p>
<b>Energy and Sustainability</b>	
FUTURE-PROOFED	<p>Prior to occupation, a District Heat Network Energy Strategy must be approved setting out how the development will be designed and built so that all parts of it will be capable of connecting to any future District Heat Network.</p>

CONNECTION TO DHN	Applicant's Position: <b>Agreed</b>
CARBON OFFSET PAYMENT 1	<p>The development as built is to achieve the respective carbon reduction as set out in the submitted Application Stage Energy Strategy.</p> <p>Prior to implementation, the developer shall pay an off-site contribution of 50% of the total application stage predicted carbon shortfall (58 tonnes/CO<sub>2</sub>). This equates to 29 tonnes/CO<sub>2</sub>. Calculated applying the Council's current tariff rate of £95/tonne for 30 years, this is <b>£83,647.50</b> (index linked).</p> <p>Applicant's Position: <b>Agreed.</b></p>
CARBON OFFSET PAYMENT 2	<p>No later than 4 weeks following occupation of the development, the owner shall submit an Occupation Stage Energy Strategy to the Council for approval.</p> <p>The Occupation Stage Energy Strategy shall demonstrate how the development will achieve the Agreed Carbon Targets in accordance with the principles contained in the Application Stage Energy Strategy.</p> <p>In the event that the Occupation Stage Energy Strategy demonstrates the application stage predicted savings have been met or exceeded, the applicant shall pay the Carbon Green Fund Contribution 2 (thereby fully offsetting the differential between on-site as-built carbon savings and net zero), which shall be calculated applying the Council's carbon offset tariff in place at that time. Only following receipt of the Carbon Green Fund Contribution 2 will the Local Planning Authority issue its approval in writing. In the event that the Strategy demonstrates carbon savings greater than the outstanding balance of 29 tonnes/CO<sub>2</sub> have been achieved, the developer will be eligible for a proportionate disbursement from the monies paid as part of Carbon Offset Payment 1.</p> <p>In the event that the Occupation Stage Energy Strategy demonstrates the as-built scheme falls short of the application stage predicted savings, the applicant shall accompany their submission with an Energy Strategy Addendum setting out additional energy efficiency proposals to achieve the Agreed Carbon Targets. If the Council agrees to the proposed additional measures, the owner shall implement all of the measures within six months of the Council's approval of the Addendum. If the Council and owner cannot come to an agreement on the proposed additional measures, the owner shall pay a further carbon</p>



	<p>offset contribution (to be calculated applying the Council's carbon offset tariff in place at that time) within 28 days of the Council issuing their request.</p> <p>The Occupation Stage Energy Strategy shall be complied with in completing and occupying the development.</p> <p>Applicant's Position: <b>Agreed.</b></p>
REVIEW OF AGREED CARBON TARGETS	<p>The applicant shall submit a Post-Occupation Energy Review on the first and third anniversaries of occupation verifying that the Agreed Carbon Targets continue to be achieved in the immediate post-occupation period.</p> <p>In the event that the Year 1 Post-Occupation Energy Review and/or the Year 3 Post-Occupation Energy Review reveals the actual post-occupation carbon savings performance of the building to be inferior to the Agreed Carbon Targets, the applicant will be obligated to submit an Energy Strategy Addendum and to follow the same set of steps as detailed in the equivalent 'CARBON OFFSET PAYMENT 2' scenario.</p> <p>Applicant's Position: <b>Agreed.</b></p>
BE SEEN MONITORING	<p>Within 8 weeks of the grant of the planning permission, the owner shall submit to the GLA and the Council accurate and verified estimates of the 'Be Seen' energy performance indicators.</p> <p>Prior to occupation of the development the owner shall provide to the GLA and the Council updated accurate and verified estimates of the 'Be Seen' energy performance indicators.</p> <p>On the first anniversary of occupation or following the end of the Defects Liability Period (whichever is the later) and at least for the following four years after that date, the Owner shall submit to the GLA accurate and verified annual in-use energy performance data for all relevant indicators.</p> <p>In the event that the 'in-use stage' evidence shows that the 'as-built stage' performance estimates have not been or are not being met, the owner shall identify the causes of underperformance and the potential mitigation measures. The owner shall submit to the GLA and the Council a Mitigation Measures Plan comprising of measures that are reasonably practicable to implement, along with a proposed timescale for implementation. The measures shall be</p>

	implemented in accordance with the approved Mitigation Measures Plan.
	Applicant's Position: <b>Agreed.</b>
<b>Administration</b>	Payment to cover the costs of monitoring these necessary planning obligations (with the exception of those that have monitoring contributions already factored-in), calculated as 2% of total sum.
	Applicant's Position: <b>Agreed</b>

435. In the event that a satisfactory legal agreement has not been entered into by 29<sup>th</sup> September 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 mitigation against the adverse impacts of the development through projects or contributions, contrary to: Policy DF 1 (‘Planning Obligations’) of the London Plan 2021; Policy IP3 (‘Community Infrastructure Levy (CIL) and Section 106 Planning Obligations’) of the Southwark Plan; and the Southwark ‘Section 106 Planning Obligations and Community Infrastructure Levy SPD’ 2015”.*

### **Mayoral and Borough Community Infrastructure Levies**

436. 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 Borough 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, while the Borough CIL will provide for infrastructure that supports growth in Southwark.
437. The gross amount of CIL is approximately £595,987.60, consisting of £189,271.14 Mayoral CIL and £406,716.46 Borough CIL. It should be noted that this is an estimate, and the floor areas on approved drawings will be checked when the related CIL Assumption of Liability Form is submitted, after planning approval has been obtained.

### **Community involvement and engagement**

438. This application was accompanied by a Statement of Community Involvement, confirming the public consultation that was undertaken by the applicant during the pre-application. A further statement was submitted mid-application to explain the additional consultation undertaken during the application phase. The table below summarises this consultation:

<b><u>Developer Consultation: Summary Table</u></b>	
<b><u>Date</u></b>	<b><u>Form of consultation</u></b>
<b>Meetings (Pre-application engagement)</b>	
January 2020	<p>Design Review Panel, at which the following topics were presented:</p> <ul style="list-style-type: none"> <li>• Context and design response</li> <li>• Land uses and building operations</li> <li>• Public realm</li> <li>• Servicing, access and transport</li> <li>• Sustainability</li> <li>• Architectural character</li> </ul>
November 2020	Meeting with the then Cabinet Member for Planning.
<b>Public Consultation Events (pre-application phase)</b>	
February 2021	<ul style="list-style-type: none"> <li>• Letter sent to six local political and community stakeholders introducing the applicant and inviting them to meet.</li> <li>• An information pack and feedback form sent to 85 addresses that neighboured the site.</li> <li>• The same information pack and feedback form hand delivered to 2,770 further residents.</li> <li>• The launch of a dedicated consultation website, <a href="http://www.21sgr.co.uk">www.21sgr.co.uk</a>, so that residents could learn more about the proposals and provide their feedback.</li> <li>• A letter sent to 11 key local stakeholders to ensure they were aware about the launch of the consultation.</li> <li>• Six meetings held with local political and community stakeholders.</li> </ul>
May 2021	<ul style="list-style-type: none"> <li>• An updated information pack (with freepost feedback form) containing more details about the proposals delivered to 85 addresses around the site (two copies in each instance – one posted, one hand delivered).</li> <li>• The same information pack (with freepost feedback form) hand delivered to 2,770 further local residents.</li> </ul>

	<ul style="list-style-type: none"> <li>An update to the dedicated consultation website, <a href="http://www.21sgr.co.uk">www.21sgr.co.uk</a>, so that it contained the latest information about the proposals.</li> </ul>
<b>Public Consultation Events (planning application phase)</b>	
November 2021	Meeting with the Ward Councillors to discuss their representations to the Planning Application.
November 2021	Meeting with the custodians of the pocket park and a member of the 'Stop the Tower' Campaign Group.
March 2022	<ul style="list-style-type: none"> <li>Two in-person drop-in events were held on the application site for near neighbours.</li> <li>The sessions were advertised via a printed letter sent to 187 addresses on Oswin Street/Elliot's Row and at Perronet House, with interested neighbours invited to register in advance for 20-minute slots over the course of either session.</li> <li>Notifications were also sent via email to: <ul style="list-style-type: none"> <li>the St George's ward councillors;</li> <li>Hayles TRA;</li> <li>Perronet TRA;</li> <li>Metropolis; and</li> <li>the Stop 21 St George's Tower Hotel campaign group.</li> </ul> </li> </ul>

439. Included within the Statement of Community Involvement are the consultation materials that were circulated as part of the pre-application engagement exercise. A summary of each topic raised by the community feedback is also provided, along with details of how the applicant responded.
440. The pre-application consultation undertaken by the applicant was an adequate effort to engage with those affected by the proposals. Due to Covid-19 restrictions that were in place at the time, face to face meetings were not deemed to be suitable in line with national guidance. The 'at a distance' engagement (via postal, virtual and website tools), as detailed in the table above, is considered to be an acceptable engagement method.
441. The engagement undertaken at the application stage that was open to the broader public (as opposed to specific stakeholders), by which time all Covid-19 restrictions had been lifted, took the form of two separate in-person consultation events at the 21 St George's Road building. The extent and format of application stage community engagement is considered adequate.
442. Although some respondents to the public consultation have complained that consultation materials circulated/presented by the applicant were not in languages other than English and that this may have prejudiced non-English speakers or those whose first language is not English, the applicant confirmed

that they would have been happy to provide translated materials on a person-by-person basis if approached. This is considered to be a reasonable offer that meets the intentions of the Equality Act 2010.

443. The Council, as part of its statutory requirements, sent letters to surrounding residents, issued a press notice publicising the planning application and displayed notices in the vicinity of the site. Re-consultation letters were issued to all those who commented as part of the original round of consultation. Details of the consultation undertaken by the Local Planning Authority are set out in the appendices. The responses received are summarised earlier in this report.

### **Consultation responses from external consultees**

444. Bakerloo Line Extension Safeguarding Unit

- TfL BLESU is satisfied the application documents provide adequate assurances that a workable foundation design is possible. To ensure the final foundation design is compatible with the BLE, if the Council, in its capacity as Local Planning Authority, is minded to grant planning permission, a condition should be attached requiring Design and Construction Method Statements for Ground Floor and Below Ground Structures prior to commencement.
  - **Officer response:** The recommended condition has been attached to the draft decision notice.

445. City Airport:

- Did not wish to comment.

446. City of London:

- Did not wish to comment.

447. Civil Aviation Authority

- Did not wish to comment.

448. Environment Agency:

- No objection/comments.
  - **Officer response:** Noted.

449. Heathrow Airport:

- Informative relating to Construction Aviation Warning Lights is recommended
  - **Officer response:** The recommended informative has been attached to the draft decision notice.

450. Historic England:

- No objection/comments.
  - **Officer response:** Noted.

451. GLA [Stage I response]:

- Full details of the affordable workspace must be provided prior to the Mayor's decision making stage and secured as part of any future planning permission.
  - **Officer response:** 10% of the total office GIA would be secured at an affordable rate of 75% of the LMR. Further detailed information, including qualifying criteria, can be found in the 'Principle of development' and 'Planning obligations' sections of this report.
- The Local Planning Authority must agree and secure the relocation strategy for Nandine and their right to first refusal of the micro retail unit.
  - **Officer response:** A strategy for relocating Nandine temporarily during construction works and permanently following completion of the building has been agreed with the applicant. Compliance with this will be secured in the Section 106 Agreement. Further detailed information about the strategy can be found in the 'Principle of development' and 'Planning obligations' sections of this report.
- Full details of the affordable retail unit must be provided prior to the Mayor's decision making stage and secured as part of any future planning permission.
  - **Officer response:** The micro retail unit would be secured at an affordable rate of no more than the rate for a typical Southwark-licensed market trading pitch in Elephant and Castle. Further detailed information, including qualifying criteria, can be found in the 'Principle of development' and 'Planning obligations' sections of this report.
- Detailing of the green wall should be secured as part of any future planning permission
  - **Officer response:** The suggested condition has been included on the draft decision notice.
- The Local Planning Authority should identify any noise and vibration impacts arising for the neighbouring plots. Any appropriate mitigation should be robustly secured as part of any planning permission
  - **Officer response:** Noise and vibration impacts have been assessed by the Environmental Protection Team and it is considered that, by securing compliance with the relevant documentation via condition, no undue harm will arise as a result of the development.
- GLA officers would welcome discussions with the applicant and the Council regarding the provision of public toilets as part of these proposals.
  - **Officer response:** Although the scheme comprises over 1,000 square metres of main town centre uses, and thus engages part 1) 6.

of Southwark Plan Policy P3 which relates to the provision of public toilets, the constrained footprint of the site makes free-of-charge public toilets too difficult to accommodate while also providing optimised active frontages. Given that the restaurant/café unit would be legally required to provide a WC within its demise for use by its customers, and taking account of the proximity of public toilets at Geraldine Mary Harmsworth Park, on balance the non-provision of public toilets in this instance is considered permissible.

- GLA officers are of the view the proposed scheme and its public benefits could off-set the harm arising from the demolition of the existing building – once these have been appropriately detailed and secured. An update will be provided at the Mayor’s decision making stage accordingly, following Southwark Council’s consideration of the proposal and the receipt of a draft decision and any draft Section 106 agreement.
  - **Officer response:** Noted.
- Transport comments as per TfL’s sent under separate cover.
  - **Officer response:** See comments, and officer response where relevant, under the ‘Transport for London’ bullet point below.
- The applicant is required to submit additional energy information, regarding: non-domestic CO2 emissions; overheating and active cooling; renewable technologies; and ‘be seen’ monitoring. Once this additional information has been provided the applicant must confirm the carbon shortfall in tonnes CO2 and the associated carbon offset payment that will be made to the borough.
  - **Officer response:** The applicant has submitted the requested additional information, which the Local Planning Authority considers to be adequate.
- A fully completed GLA WLC template should be submitted as an Excel document, and a post-construction assessment to report on the development’s actual WLC emissions should be secured by condition.
  - **Officer response:** The applicant has submitted the requested Excel document, and a planning condition is recommended with regard to WLC reporting.
- On circular economy, the applicant should provide additional information regarding: recycling and waste reporting; the overall policy target of 20% reused or recycled content by value; and the pre-demolition audit, operational waste and end of life strategy
  - **Officer response:** The applicant has submitted the requested items, and a planning condition is recommended with regard to circular economy reporting.
- The specification and final UGF should be confirmed prior to Stage 2.
  - **Officer response:** The applicant has submitted detailed information to confirm that a score of 0.40 would be achieved, and a planning

condition is recommended to ensure the scheme as built would achieve the score.

- The FRA provided for the proposed development does not comply with London Plan Policy SI.12, as it does not give appropriate regard to emergency planning and flood resilience measures due to the risk of breach flooding at the site, and it does not include an assessment of sewer flood risk.
  - **Officer response:** The applicant has submitted an updated FRA to address these points, and the GLA will be able to comment again on this as part of the Stage 2 process.
- The surface water drainage strategy for the proposed development does not give appropriate regard to the greenfield runoff rate. The northern part of the site should be included within the drainage strategy or justification provided as to why it has not been mentioned. Hydraulic calculations and a drainage strategy plan should be provided for the proposed attenuation and SuDS features.
  - **Officer response:** The applicant has submitted an updated FRA to address these points, and the GLA will be able to comment again on this as part of the Stage 2 process.
- With regard to water efficiency, the applicant should also consider and 'active' rainwater harvesting system.
  - **Officer response:** A rainwater harvesting system had been considered by the applicant, but it was discounted due to limited space and depth, as well as the need for excessive pumping. The Council's Flood Risk Management Team has been willing to accept this justification for non-provision. The GLA will be able to comment again on this as part of the Stage 2 process.
- On air quality, the applicant should continue to work with the Council to identify any appropriate mitigation prior to the Mayor's decision making stage.
  - **Officer response:** A Final CEMP, CLP and DSP will be secured by condition to ensure the construction and operational phases limit air quality impacts as much as is reasonable. GLA will be able to comment again on this as part of the Stage 2 process.

#### 452. Health and Safety Executive (Fire Risk Unit):

- No comments, as the building is not a "relevant building" due to being entirely non-residential.
  - **Officer response:** Noted.

#### 453. London Borough of Lambeth

- Did not wish to comment.

#### 454. London Fire Brigade



- No objection/comments.
- **Officer response:** Noted.

455. London Underground:

- No objection/comments.
- **Officer response:** Noted.

456. Metropolitan Police:

- No objection subject to a two part 'Secured by Design' condition being applied.
- **Officer response:** The suggested condition has been included on the draft decision notice.

457. Natural England:

- No objection/comments.
- **Officer response:** Noted.

458. Network Rail

- No objection/comments.
- **Officer response:** Noted.

459. Thames Water

- A Piling Method Statement must be secured by condition. Other informatives relating to waste water are recommended
- **Officer response:** Noted. The recommended conditions and infomatives have been attached to the draft decision notice.

460. Transport for London:

- The outward-opening emergency exit door adjacent to the micro retail unit would present a potential encroachment into the highway and a potential risk if someone is standing there. It should be inward-opening or recessed if possible.
- **Officer response:** In-setting the emergency escape doors, and in so doing creating alcoves, would generate opportunities for rough sleeping and litter gathering, contrary to good design and the recommendations of the Metropolitan Police's Secured by Design Team. The door in question would not be used regularly and a reasonable degree of pedestrian protection would be provided by a short barrier, to be installed on land the applicant intends to retain ownership of (but to be accessible 24/7 by the general public). As such, the Local Planning Authority considers it acceptable for this particular door to swing outward.

- £13,000 should be secured, for one new sign and four map refreshes, as should £70,000 (reduced from an original request of £220,000) for investment in ongoing management of Santander docking stations in the local area.
  - **Officer response:** Both of these contributions would be secured through the Section 106 Agreement.
- To ensure the final foundation design is compatible with the BLE, the Council should include an appropriately worded condition in any draft decision notice.
  - **Officer response:** The suggested condition has been included on the draft decision notice.
- The proposed one accessible parking space should have electric vehicle charging facilities.
  - **Officer response:** A condition requiring an EVCP for the parking space has been included on the draft decision notice.
- The proposed short-stay parking, owing to its location on St George's Road, which is TLRN, will need to form part of the s278 agreement with TfL, and any permission should impose on the applicant the requirement to obtain Technical Approval from TfL for the basement excavation works.
  - **Officer response:** The applicant would be obligated to deliver on both requirements via the Section 106 Agreement.
- A Final Travel Plan, Final DSP and CLP should be secured by condition.
  - **Officer response:** The suggested condition has been included on the draft decision notice.

461. UKPN:

- Did not wish to comment.

### **Community impact and equalities assessment**

462. 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.

463. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

464. The Council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights

465. The Council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application. The positive impacts have been identified throughout this report. They include:

- Accessible accommodation: 10% of all hotel rooms would be wheelchair accessible. One wheelchair parking space would also be provided.
- Affordable workspace: 10% of the office space would be available at affordable rates to SMEs that meet the Council's qualifying criteria.
- Business relocation: An existing small local retailer operating from a pitch adjacent to the site would benefit from first refusal of new premises within the proposed development at a rental rate capped in line with Southwark street trading rates. In the event that the existing small local retailer declines, the unit would be available to eligible SMEs at the same capped rental rate.
- Employment and training opportunities: Local unemployed people would benefit from jobs and training opportunities connected with the end use of the building.
- Improved and more accessible public realm: The proposed public realm at the base of the building, as well as the agreed improvements to footways and highways within the vicinity of the site, would all be designed to assist people with mobility impairments. Physical measures such as level or shallow gradient surfaces and dropped kerbs would benefit disabled and older people in particular.
- Public safety: Safer public spaces (through the various proposed active and passive security and surveillance measures) would benefit all groups, but in particular older people, disabled people and women.

466. 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.

## Human rights implications

467. 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.
468. This application has the legitimate aim of redeveloping the site, to include demolition of the existing building, for a new 15-storey building with rooftop plant, containing a hotel, office, retail and restaurant space, together with public realm improvements and other associated works. 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.

<b>Positive and proactive engagement: summary table</b>	
Was the pre-application service used for this application?	YES
If the pre-application service was used for this application, was the advice given followed?	YES
Was the application validated promptly?	YES
If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	YES

## CONCLUSION

469. This application would bring into productive and optimised re-use this brownfield and underutilised site, providing a complementary mixture of office, hotel and retail uses that would support the role and vibrancy of the Central Activities Zone and the Elephant and Castle Major Town Centre. It would also provide a policy compliant level of affordable workspace suitable for new and small businesses, as well as a micro affordable retail unit with first refusal rights given to the operator of an existing kiosk situated to the front of the site on St George's Road. Once operational, the development has the potential to accommodate over 100 employees, bringing significant economic benefits to the borough.
470. As expanded upon in the report, the proposal would be separated from the majority of the surrounding dwellings by distances in excess of those advised by the Residential Design Standards. In the relatively limited number of instances where the relationship to residential windows opposite would be sensitive, obscuring treatments are to be applied to the proposed glazing. The proposed office, hotel and retail uses are not especially noise generating; as such, and with further protections secured (in the form of management plans, hours of use controls, and plant sound maximum thresholds), it is highly unlikely

that nearby residents would experience noise disturbance. The proposal would cause daylight impacts in excess of the BRE guidance to a small number of surrounding properties. However, in most cases the resulting daylight levels would not be uncommon for central London and in all instances the degree of change would not cause harm to the occupiers' amenity.

471. The issue raised most commonly by the public objections is the height and scale of the proposed building. Associated concerns about the proposal being harmful to or not in-keeping with local character have also been raised. The design of the proposed development evolved as a result of extensive discussions throughout the pre-application phase, with further refinement during the formal application stage. The articulated form and elevational treatment, terminated by a faceted crown, would make for a distinctive building that adds visual interest to the local townscape. As a consequence, the proposal would read as a complimentary component of the cluster of tall buildings within Elephant and Castle, its fifteen storeyed height providing a transition between the taller elements consented the east and the conservation area and lower residential elements to the west. While the loss of the existing building would constitute substantial harm to an undesignated heritage asset, a balanced judgement has been made having regard to the public benefits of the scheme. These benefits would outweigh the minor harm to the significance of the Elliott's Row Conservation Area and the West Square Conservation Area.
472. With its active frontage and new publicly-accessible external space, the latter made possible by relocating the existing kiosk to within the demise of the building, the development would provide a more engaging and animated building at street level. It would also bring valuable greening and biodiversity benefits to this part of the borough.
473. Environmental matters of concern to local residents, such as wind effects, construction management, noise and vibration have all been addressed satisfactorily by the applicant, and compliance will be secured by appropriate conditions.
474. Subject to compliance with the detailed energy and sustainability strategies submitted and payment of the Carbon Green Fund, the development satisfactorily addresses climate change policies.
475. In line with the requirements of the NPPF, the Council has applied the presumption in favour of sustainable development. The proposal would accord with sustainable principles and would make efficient use of a prominent underutilised brownfield site to deliver a high quality development that is in accordance with the Council's aspirations for the area. It is therefore recommended that planning permission is granted, subject to conditions as set out in the attached draft decision notice, referral to the GLA, and the timely completion of a Section 106 Agreement.

**BACKGROUND DOCUMENTS**

<b>Background Papers</b>	<b>Held At</b>	<b>Contact</b>
Site history file: 797-M Application file: 21/AP/2838 Southwark Local Development Framework and Development Plan Documents	Environment, Neighbourhoods & Growth Department, 160 Tooley Street, London, SE1 2QH	<ul style="list-style-type: none"> <li>• Planning enquiries telephone: 020 7525 5403</li> <li>• Planning enquiries email: planning.enquiries@southwark. gov.uk</li> <li>• Case officer telephone: 020 7525 5535</li> <li>• Council website: www.southwark.gov.uk</li> </ul>

**APPENDICES**

<b>No.</b>	<b>Title</b>
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
Appendix 6	DRP report
Appendix 7	Floorspace schedule
Appendix 8	Existing and pipeline visitor accommodation within a 750m radius of the application site

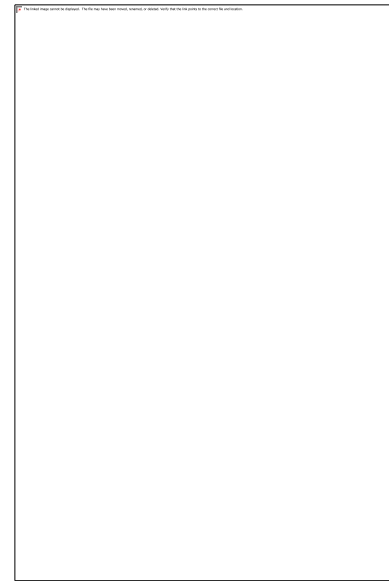
**AUDIT TRAIL**

<b>Lead Officer</b>	Stephen Platts, Director of Planning and Growth	
<b>Report Author</b>	Patrick Cronin, Team Leader	
<b>Version</b>	Final	
<b>Dated</b>	15 March 2023	
<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments included</b>
Strategic Director of Finance & Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
<b>Date final report sent to Constitutional Team</b>		16 March 2023

**SOUTHWARK COUNCIL**

Town and Country Planning Act 1990 (as amended)

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



[www.southwark.gov.uk](http://www.southwark.gov.uk)

**DRAFT DECISION NOTICE**

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**LBS Reg. No.:** 21/AP/2838

**Date of Issue of Decision:** N/A

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Applicant    Create REIT Limited

**Planning permission is GRANTED WITH LEGAL AGREEMENT for the following development:**

Redevelopment of the site to include demolition of the existing building and the construction of a new 15-storey building with rooftop plant, containing a hotel, office, retail and restaurant space, together with public realm improvements and other associated works.

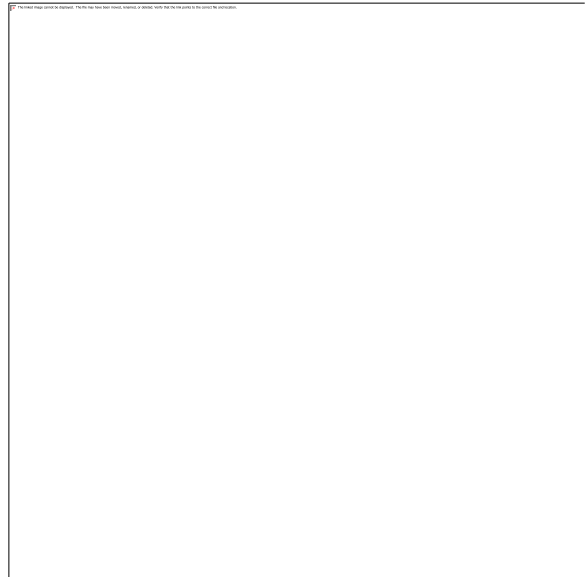
at

21 St Georges Road, London, Southwark

In accordance with the valid application received on 9 August 2021 and supporting documents submitted which can be viewed on our Planning Register.

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

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

**DRAFT DECISION NOTICE****LBS Registered Number:** 21/AP/2838**Date of issue of this decision:** N/A

www.southwark.gov.uk

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**Conditions**


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**Permission is subject to the following Approved Plans Condition:**

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

Plan or document name / Reference no. / Rev no. / Date / Author	Received on:
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**PLANNING, DESIGN AND HERITAGE DOCUMENTATION**


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DESIGN AND ACCESS STATEMENT	09/08/2021
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Reference no 1901-LAT-ZZ-XX-RP-00015-P01 - No  
revision/version number - Undated - Produced by Latitude

21 ST GEORGE'S ROAD LONDON SE1 (CASTLE WORKS) [HERITAGE STATEMENT]	09/08/2021
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No reference number - Issue No 4A - Dated July 2021 -  
Produced by Oxford Archaeology

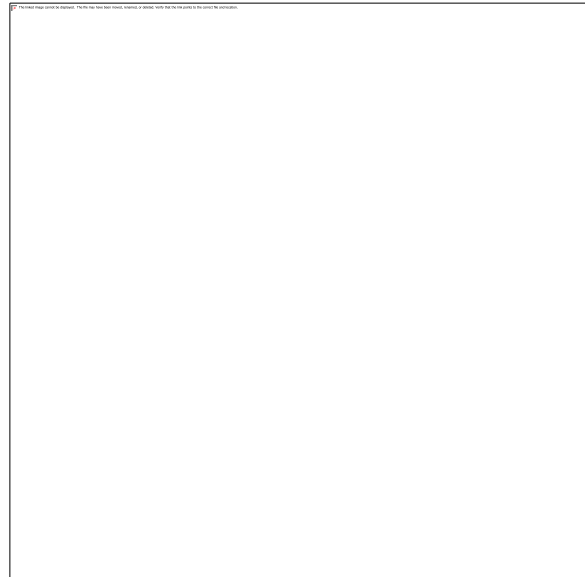
PLANNING STATEMENT	09/08/2021
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No reference number - No revision/version number - Dated July  
2021 - Produced by DP9

TOWNSCAPE AND VISUAL IMPACT REPORT	08/09/2021
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No reference number - Revision 1 - Dated October 2021 -  
Produced by Peter Stewart Consultancy



**DRAFT DECISION NOTICE****LBS Registered Number:** 21/AP/2838**Date of issue of this decision:** N/A

www.southwark.gov.uk

HOTEL DEMAND LETTER 09/08/2021  
 No reference number - No revision/version number - Dated 21  
 October 2022 - Produced by Savills

MARKET REPORT; OFFICES 05/01/2023  
 No reference number - No revision/version number - Dated 12  
 December 2022 - Produced by BBG

**AMENITY IMPACTS DOCUMENTATION**

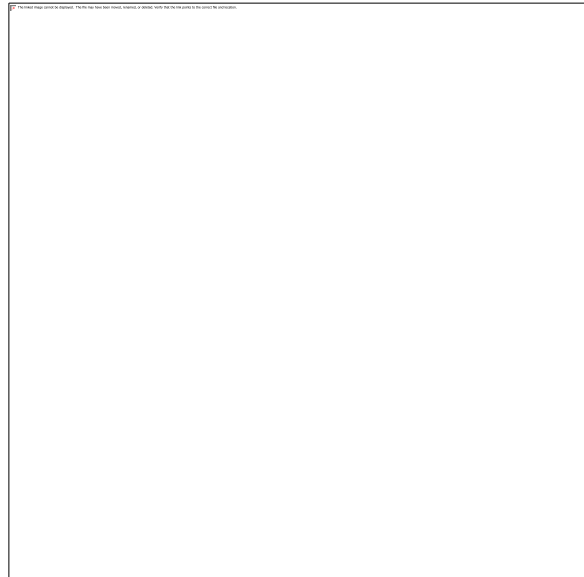
DAYLIGHT AND SUNLIGHT REPORT 07/04/2022  
 No reference number - Version V1 (Rev 1) - Dated March 2022  
 - Produced by Point 2 Surveyors

DAYLIGHT AND SUNLIGHT ASSESSMENT SUPPLEMENTAL  
 DOCUMENT RELATING TO BRE GUIDELINES 13/09/2022  
 No reference number - No revision/version number - Dated 13  
 September 2022 - Produced by Point 2 Surveyors

POTENTIAL OVERLOOKING AND LIGHT POLLUTION  
 MITIGATION 12/09/2022  
 No reference number - No revision/version number - Dated 04  
 April 2022 - Produced by Latitude

PLANT NOISE ASSESSMENT 09/08/2021  
 Reference no 10714.RP01.PNA.1 - Revision 1 - Dated 07 July  
 2021 - Produced by RBA Acoustics

21 ST GEORGE'S ROAD - DRAFT OPERATIONAL MANAGEMENT  
 PLAN 09/08/2021

**DRAFT DECISION NOTICE****LBS Registered Number:** 21/AP/2838**Date of issue of this decision:** N/A

[www.southwark.gov.uk](http://www.southwark.gov.uk)

No reference number - No revision/version number - Undated  
 - Produced by Caneparo Associates

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**COMMUNITY CONSULTATION DOCUMENTATION**


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STATEMENT OF COMMUNITY INVOLVEMENT 09/08/2021

No reference number - No revision/version number - Dated July 2021 - Produced by Kanda

SUBMISSION OF ADDITIONAL INFORMATION IN RESPONSE TO REPRESENTATIONS TO PLANNING APPLICATION REF 21/AP/2838 - FOR THE REDEVELOPMENT OF 21 ST GEORGE'S ROAD, ELEPHANT AND CASTLE, TO DELIVER A HOTEL-LED MIXED USE DEVELOPMENT 07/04/2022

Reference no OS/AB DP5306 - No revision/version number - Dated 06 April 2022 - Produced by DP9

RE: SUMMARY OF DROP-IN SESSIONS TO DISCUSS PROPOSALS FOR 21 ST GEORGE'S ROAD (21/AP/2838) 13/04/2022

No reference number - No revision/version number - Dated 13 April 2022 - Produced by Create REIT

ENGAGEMENT SUMMARY TEMPLATE FOR THE DEVELOPMENT CONSULTATION CHARTER (VALIDATION REQUIREMENT) 09/08/2021

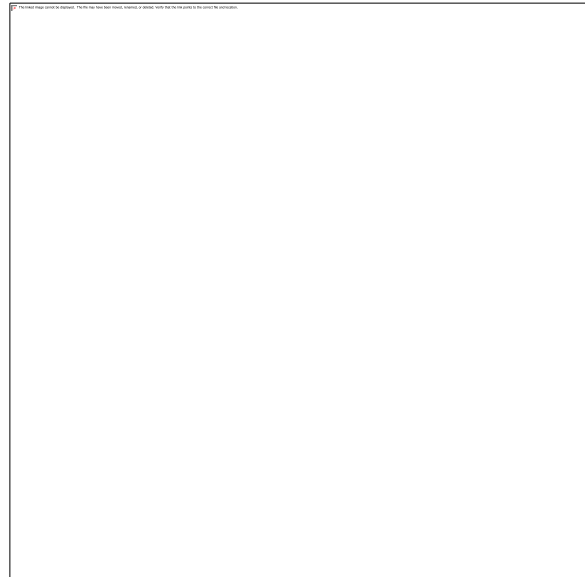
No reference number - No revision/version number - Undated - Author not stated

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**ENVIRONMENTAL AND SUSTAINABILITY DOCUMENTATION**


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FLOOD RISK ASSESSMENT AND DRAINAGE REPORT 13/09/2022

**DRAFT DECISION NOTICE****LBS Registered Number:** 21/AP/2838**Date of issue of this decision:** N/A

www.southwark.gov.uk

No reference number - Revision 4 - Dated July 2022 -  
Produced by Price and Myers

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EMAIL FROM PLANNING AGENT TO CASE OFFICER, TO SUPPLEMENT 'FLOOD RISK ASSESSMENT AND DRAINAGE REPORT - REV 4 - DATED JULY 2022'	13/09/2022
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No reference number - No revision/version number - Dated 13  
September 2022 - Produced by DP9

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21 ST GEORGE'S ROAD POCKET PARK CONSTRUCTION INTERFACE	07/04/2022
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No reference number - No revision/version number - Dated  
December 2021 - Produced by Blue Sky Building

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PEDESTRIAN LEVEL WIND MICROCLIMATE ASSESSMENT	09/08/2021
Reference no RWDI #2001861 - Revision C - Dated 28 June 2021 (and July 2021) - Produced by RWDI	

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21 ST GEORGE'S ROAD - POCKET PARK WIND ANALYSIS	07/04/2022
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No reference number - No revision/version number - Dated 15  
December 2021 - Author not stated

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AIR QUALITY ASSESSMENT: 21 ST. GEORGE'S ROAD, SOUTHWARK	09/08/2021
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No reference number - No revision/version number - Dated 07  
July 2021 - Produced by Air Quality Consultants

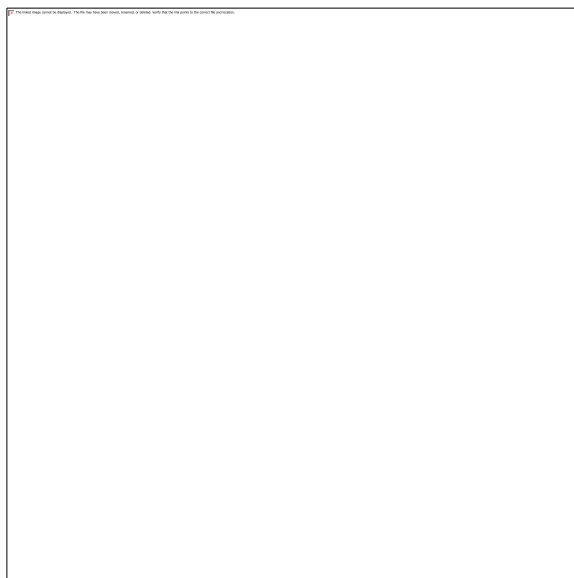
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21 ST GEORGE'S ROAD - ENERGY STATEMENT	09/08/2021
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Reference no 55419 - Revision 02 - Dated 02 July 2021 -  
Produced by Chapman BDSP

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21 ST. GEORGE'S ROAD - CIRCULAR ECONOMY AND WHOLE	09/08/2021
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**DRAFT DECISION NOTICE****LBS Registered Number:** 21/AP/2838**Date of issue of this decision:** N/A

[www.southwark.gov.uk](http://www.southwark.gov.uk)

**LIFE CARBON STATEMENT**

Reference no 55419 - Revision 00 - Dated 02 July 2021 -  
Produced by Chapman BDSP

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21 ST. GEORGE'S ROAD - SUSTAINABILITY STATEMENT 09/08/2021

Reference no 55419 - Revision 01 - Dated 02 July 2021 -  
Produced by Chapman BDSP

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21 ST GEORGE'S ROAD - VENTILATION/EXTRACTION STATEMENT 09/08/2021

Reference no 55419 - Revision 01 - Dated 07 July 2021 -  
Produced by Chapman BDSP

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OVERHEATING ANALYSIS 07/04/2022

No reference number - Revision 00 - Dated 17 December 2021  
- Produced by Chapman BDP

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GLA CARBON EMISSION REPORTING SPREADSHEET 07/04/2022

No reference number - No revision/version number - Undated -  
Produced by Chapman BDSP

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ENERGY MEMO: GLA CONSULTATION 07/04/2022

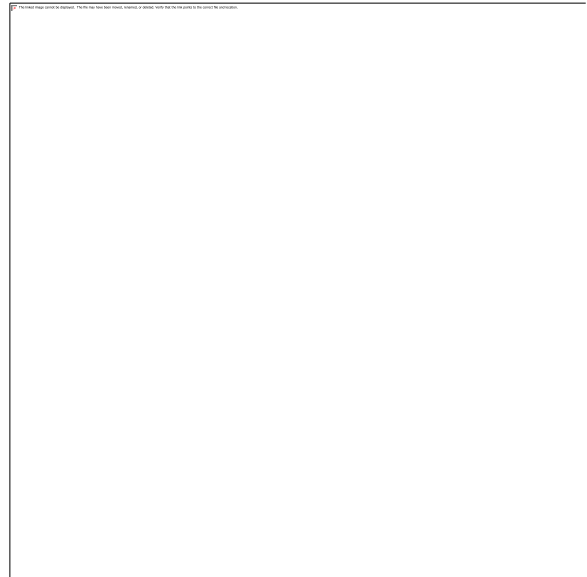
No reference number - No revision/version number - Dated 21  
September 2021 - Produced by Chapman BDSP

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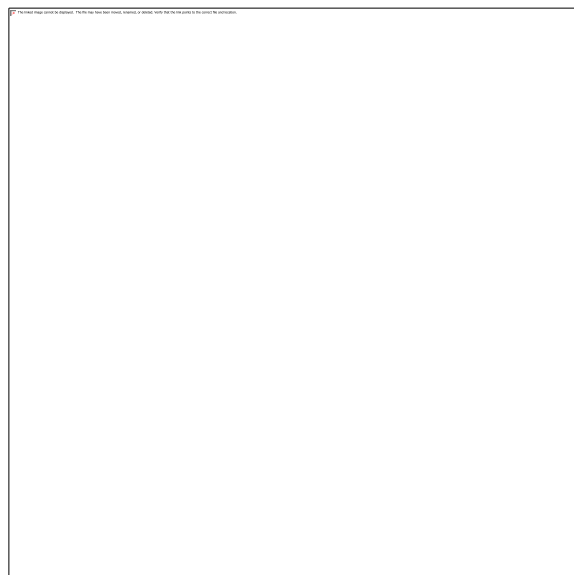
CIRCULAR ECONOMY: GLA CONSULTATION 07/04/2022

No reference number - No revision/version number - Dated 09  
September 2021 - Produced by Chapman BDSP

**PLANS, ELEVATIONS AND SECTIONS**

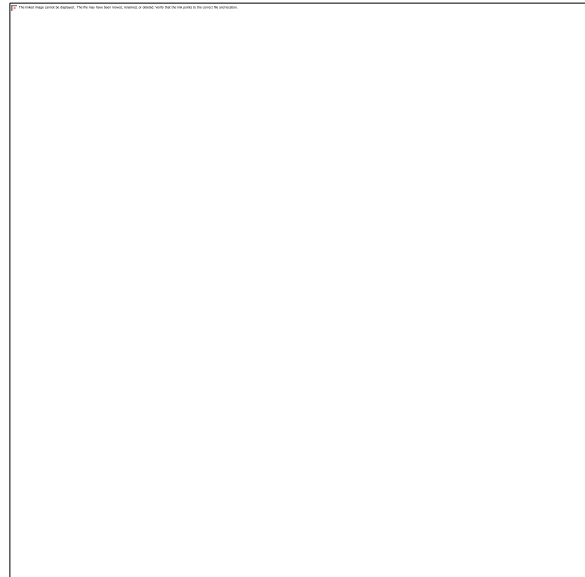
**DRAFT DECISION NOTICE****LBS Registered Number:** 21/AP/2838**Date of issue of this decision:** N/A[www.southwark.gov.uk](http://www.southwark.gov.uk)

1901-LAT-XX-ZZ-M2-A-15000-S4 Revision no P01 - PROPOSED SITE PLAN	09/08/2021
1901-LAT-ZZ-XX-DR-A-15304-S4 Revision no P01 - PROPOSED SECTION 4	09/08/2021
1901-LAT-ZZ-XX-DR-A-15303-S4 Revision no P01 - PROPOSED SECTION 3	09/08/2021
1901-LAT-ZZ-XX-DR-A-15302-S4 Revision no P01 - PROPOSED SECTION 2	09/08/2021
1901-LAT-ZZ-XX-DR-A-15301-S4 Revision no P01 - PROPOSED SECTION 1	09/08/2021
1901-LAT-XX-XX-M2-A-21501-S4 Revision no P01 - URBAN GREENING FACTOR PLANS AND ELEVATIONS	09/08/2021
1901-LAT-XX-RF-M2-A-15111-S4 Revision no P01 - PROPOSED ROOF LEVEL	09/08/2021
1901-LAT-XX-05-M2-A-15108-S4 Revision no P01 - PROPOSED LEVELS 5, 7, 9 AND 11	09/08/2021
1901-LAT-XX-04-M2-A-15107-S4 Revision no P01 - PROPOSED LEVELS 4, 6, 8, 10 AND 12	09/08/2021
1901-LAT-XX-13-M2-A-15109-S4 Revision no P01 - PROPOSED LEVELS 13 AND 14	09/08/2021

**DRAFT DECISION NOTICE****LBS Registered Number:** 21/AP/2838**Date of issue of this decision:** N/A

[www.southwark.gov.uk](http://www.southwark.gov.uk)

1901-LAT-XX-03-M2-A-15106-S4 Revision no P01 - PROPOSED LEVEL 3	09/08/2021
1901-LAT-XX-02-M2-A-15105-S4 Revision no P01 - PROPOSED LEVEL 2	09/08/2021
1901-LAT-XX-15-M2-A-15110-S4 Revision no P01 - PROPOSED LEVEL 15 - ROOFTOP PLANT	09/08/2021
1901-LAT-XX-01-M2-A-15104-S4 Revision no P01 - PROPOSED LEVEL 1	09/08/2021
1901-LAT-XX-GF-M2-A-15103-S4 Revision no P01 - PROPOSED LEVEL 0	09/08/2021
1901-LAT-XX-B2-M2-A-15102-S4 Revision no P01 - PROPOSED LEVEL -1	09/08/2021
1901-LAT-XX-B2-M2-A-15101-S4 Revision no P01 - PROPOSED LEVEL -2	09/08/2021
7358.LP.2.0 Revision no A - ILLUSTRATIVE LANDSCAPE GREEN ROOF LOWER LEVELS PLAN	09/08/2021
7358.LP.2.1 Revision no A - ILLUSTRATIVE LANDSCAPE WESTERN ELEVATION GREEN WALL PLAN	09/08/2021
7358.LP.2.2 Revision no A - ILLUSTRATIVE LANDSCAPE ROOF TOP PLAN	09/08/2021

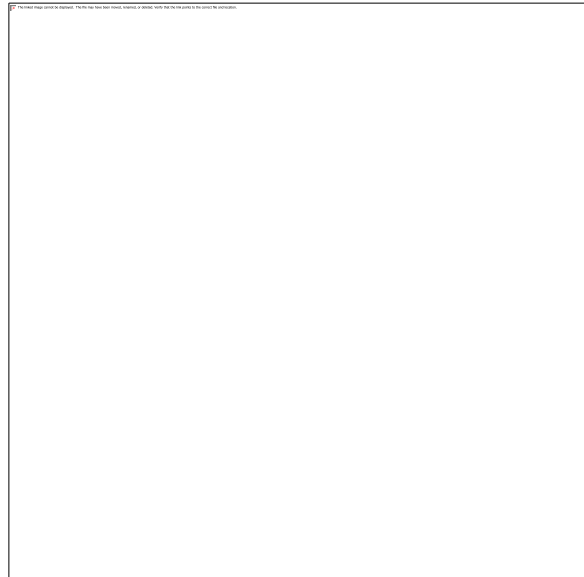
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1901-LAT-ZZ-ZZ-DR-A-15204-S4	09/08/2021
Revision no P01 - WEST ELEVATION PROPOSED	
1901-LAT-ZZ-ZZ-DR-A-15203-S4	09/08/2021
Revision no P01 - SOUTH ELEVATION PROPOSED	
1901-LAT-ZZ-ZZ-DR-A-15202-S4	09/08/2021
Revision no P01 - EAST ELEVATION PROPOSED	
1901-LAT-ZZ-ZZ-DR-A-15201-S4	09/08/2021
Revision no P01 - NORTH ELEVATION PROPOSED	

**STRUCTURAL DOCUMENTATION**

STRUCTURAL ENGINEERING - STAGE 2 BASEMENT IMPACT ASSESSMENT REPORT	09/08/2021
Reference no 29235 - Revision 2 - Dated July 2021 - Produced by Myers and Price	
STRUCTURAL ENGINEERING - CONCEPTUAL DESIGN SUBMISSION	09/08/2021
Reference no 29235 - Revision P1 - Dated August 2021 - Produced by Price and Myers	
STRUCTURAL AND CIVIL ENGINEERING - CONSTRUCTION METHOD STATEMENT REPORT	09/08/2021
Reference no 29235 - Revision P3 - Dated August 2021 - Produced by Price and Myers	
BUILDING DAMAGE GROUND MOVEMENT ASSESSMENT	09/08/2021

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Reference no 1742-A2S-XX-XX-RP-Y-0001-00 - Revision 00 -  
Dated 07 July 2021 - Produced by A-squared Studio

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21 ST GEORGE'S ROAD - FIRE STATEMENT 09/08/2021

Reference no 55419-CBD-00-ZZ-RP-F-5700 - Revision 01 -  
Dated 02 July 2021 - Produced by Chapman BDSP

**TRANSPORT DOCUMENTATION**


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OUTLINE CONSTRUCTION ENVIRONMENTAL MANAGEMENT 09/08/2021  
PLAN 21 ST GEORGE'S ROAD

No reference number - No revision/version number - Dated July  
2021 - Produced by Blue Sky Building

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OUTLINE CONSTRUCTION LOGISTICS PLAN 09/08/2021

No reference number - No revision/version number - Dated July  
2021 - Produced by Caneparo Associates

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TRANSPORT ASSESSMENT 08/09/2021

No reference number - No revision/version number - Dated July  
2021 - Produced by Caneparo Associates

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TRANSPORT FOR LONDON RESPONSE NOTE 07/04/2022

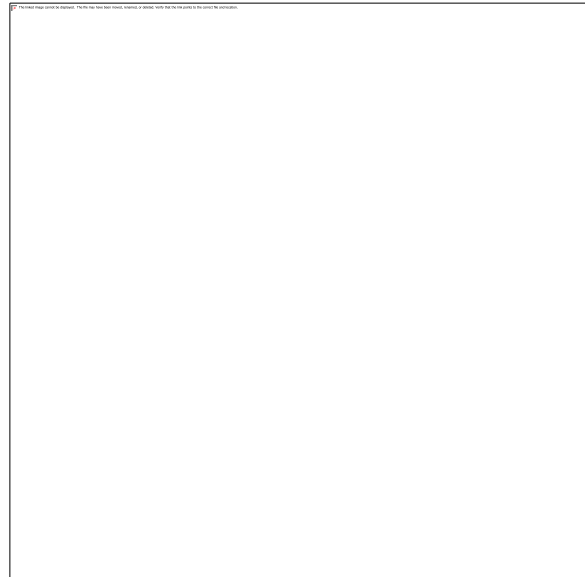
Reference no N08-JT-TfL Response Note F1 (211115) - No  
revision/version number - Dated November 2021 - Produced by  
Caneparo Associates

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FRAMEWORK DELIVERY AND SERVICING PLAN 09/08/2021

No reference number - No revision/version number - Dated July  
2021 - Produced by Caneparo Associates



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DRAFT TRAVEL PLAN 09/08/2021

No reference number - No revision/version number - Dated July 2021 - Produced by Caneparo Associates

**LOCAL ECONOMY DOCUMENTATION**

BUSINESS RELOCATION STRATEGY 09/08/2021

No reference number - No revision/version - Dated July 2021 - Produced by DP9

DIGITAL CONNECTIVITY STRATEGY 20/02/2023

No reference number - No revision/version - Dated 20 February 2023 - Produced by DP9

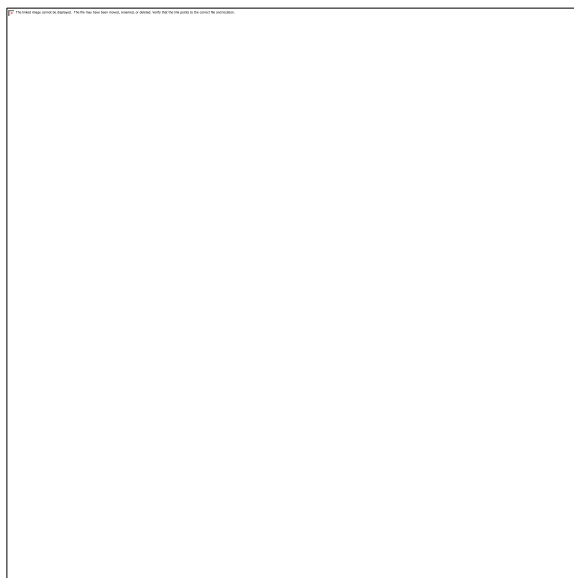
**REASON:**

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

**Permission is subject to the following Time Limit:****2. TIME LIMIT AND QUANTUM OF USES**

Permission is hereby granted for a fifteen storey building with additional rooftop plant (54.64m above ground level, 51.30m above Ordnance Datum) and a further 2-storey basement, containing:

- an 89-bedroom hotel (Class C1);
- 718.4 square metres (GIA) of office (Class E[g]);

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- a 117.6 square metre (GIA) restaurant (Class E[a], [b] and [c]);
- a 20.7 square metre retail kiosk unit (GIA) (Class E[a] and [b], which shall also include a sui generis use capable for the operation and occupation of Little Nandine only);
- public realm improvements; and
- other associated works incidental to the development.

The development hereby granted 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.

**Permission is subject to the following Pre-Commencements Condition(s)****3. SITE CONTAMINATION**

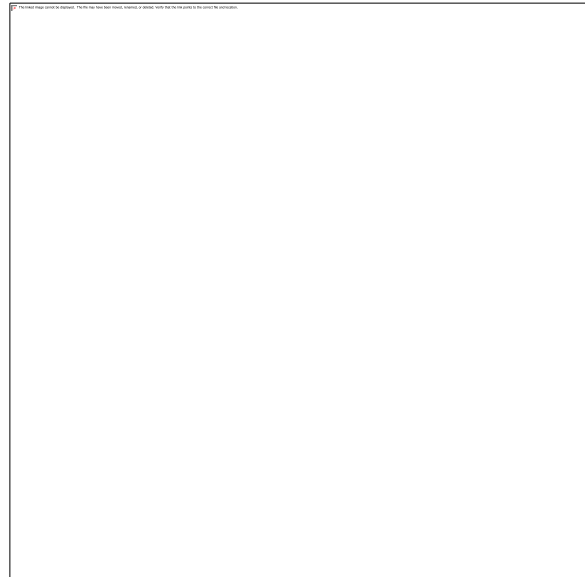
a) Prior to the commencement of any development (including any works of demolition), a 'Phase 1 Desktop Study' of the historic and current uses of the site and adjacent premises as well as a 'Preliminary Risk Assessment' including:

- a site walkover survey;
  - identification of contaminants of the land and controlled waters;
  - a conceptual model of the site; and
  - a conclusion and recommendations whether a Phase 2 intrusive investigation is required;
- shall be submitted to and approved in writing by the Local Planning

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Authority.

b) If the Phase 1 site investigation reveals possible presence of contamination on or beneath the site or controlled waters, prior to the commencement of any development an 'Intrusive Site Investigation and Risk Assessment' fully characterising the nature and extent of any contamination of soils and ground water on the site, shall be submitted to and approved in writing by the Local Planning Authority.

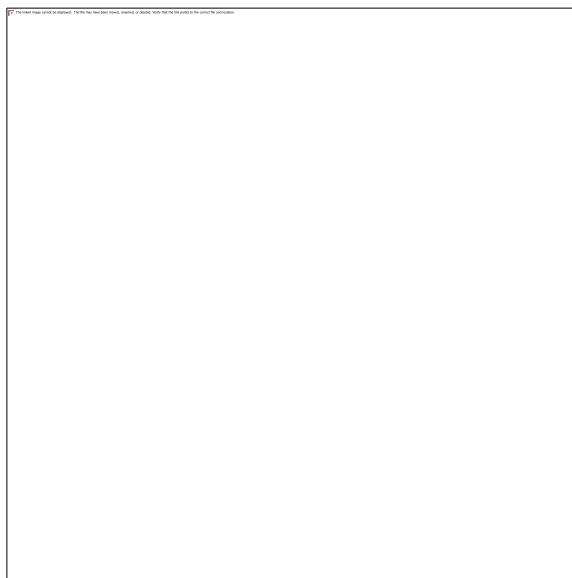
c) In the event that contamination is found that presents a risk to future users or controlled waters or other receptors, a detailed 'Remediation and/or Mitigation Strategy' including:

- all proposed actions to be taken to bring the site to a condition suitable for the intended use together with any monitoring or maintenance requirements; and
- confirmation that, as a minimum, the site shall not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation;

shall be submitted to and approved in writing by the Local Planning Authority.

The approved remediation scheme (if one is required) shall be carried out and implemented as part of the development.

d) Following the completion of the works and measures identified in the approved 'Remediation and/or Mitigation Strategy', a 'Verification Report' providing evidence that all required remediation works have been completed (together with any future monitoring or maintenance requirements), shall be submitted to and approved in writing by the Local Planning Authority.

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e) 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 and/or Mitigation Strategy' and (if required) a 'Verification Report' shall be submitted to the Local Planning Authority for approval in writing, in accordance with a-d above.

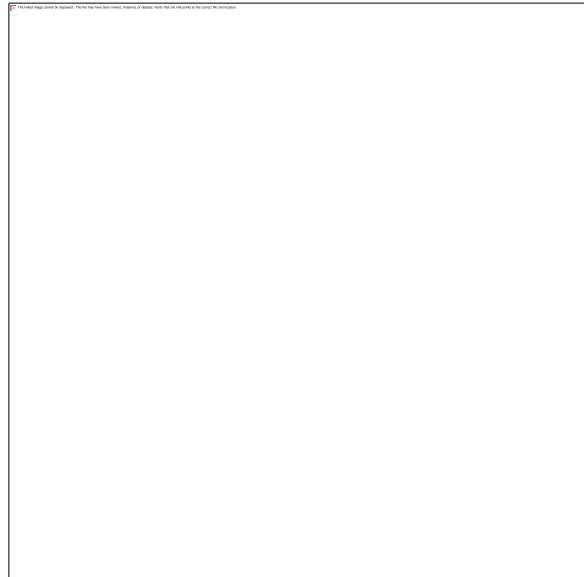
**REASON:**

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors, in accordance with: the National Planning Policy Framework 2021; and Policy P64 (Contaminated Land and Hazardous Substances) of the Southwark Plan 2022.

**4. DESIGN AND CONSTRUCTION METHOD STATEMENTS FOR GROUND FLOOR AND BELOW GROUND STRUCTURES**

Prior to the commencement of any development (including any works of demolition), detailed 'Design and Construction Method Statements' for all of the ground floor structures, foundations, basements and any other structures or works below ground level (including piling, any other temporary or permanent installations and ground investigations) which:

- accommodate the proposed location of the Bakerloo line extension tunnels, structures, infrastructure (including stations and station infrastructure) and any temporary works in the vicinity of the site; and

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- accommodate ground movement arising from the construction thereof;
  - and
  - mitigate the effects of noise and vibration arising from the operation of the Bakerloo line extension within its tunnels and other structures;
- shall be submitted to and approved in writing by the Local Planning Authority (following consultation with Transport for London by the Local Planning Authority).

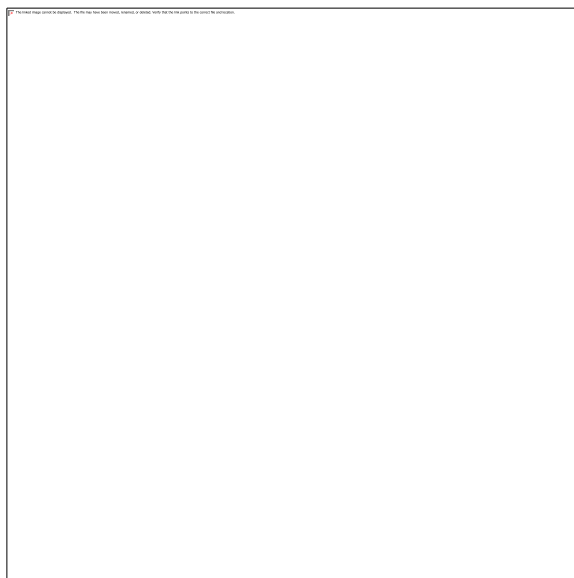
The development shall be carried out in all respects in accordance with the approved design and method statements. All structures, foundations, installations and works comprised within the development hereby permitted which are required by this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied or is otherwise opened for public use. No alteration to these aspects of the development shall take place without the approval of the Local Planning Authority in consultation with Transport for London.

**REASON:**

To safeguard the route of the Bakerloo Line Extension, in accordance with: the National Planning Policy Framework 2021; and Policies SD1 (Opportunity Areas), D2 (Infrastructure Requirements for Sustainable Densities), T1 (Strategic Approach to Transport) and T3 (Transport Capacity, Connectivity and Safeguarding) of the London Plan 2021.

**5. CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN**

Prior to the commencement of any development (including any works of demolition), a written Construction Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning

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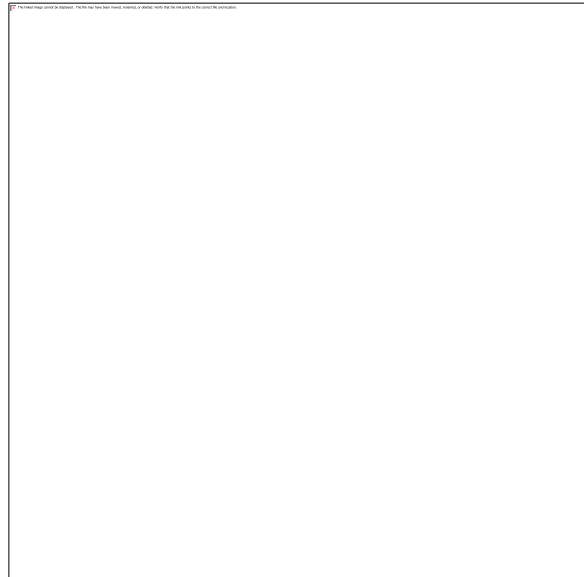
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Authority. The CEMP shall oblige the applicant, developer and contractors to commit to current best practice with regard to construction site management and to use all best endeavours to minimise off-site impacts, and will include the following information:

- 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 (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 during the enabling works (signage on hoardings, newsletters, residents liaison meetings, etc.);
- a commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme;
- site traffic (routing of in-bound and outbound site traffic, one-way site traffic arrangements on site, location of lay off areas, etc.);
- site waste management (accurate waste stream identification, separation, storage, registered waste carriers for transportation and disposal at appropriate destinations);
- a commitment that all NRMM equipment (37 kW and 560 kW) shall be registered on the NRMM register and meets the standard as stipulated by the Mayor of London.

To follow current best construction practice, including the following:

- Southwark Council's Technical Guide for Demolition & Construction at <http://www.southwark.gov.uk/construction>;
- Section 61 of Control of Pollution Act 1974;

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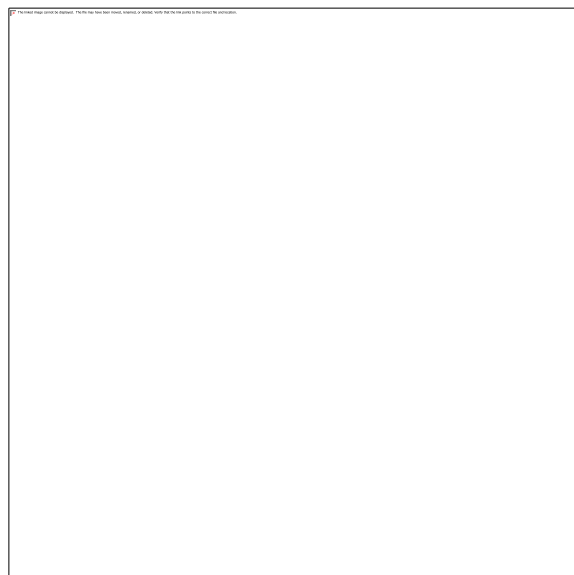
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- the London Mayors Supplementary Planning Guidance 'The Control of Dust and Emissions During Construction and Demolition';
- the Institute of Air Quality Management's 'Guidance on the Assessment of Dust from Demolition and Construction' and 'Guidance on Air Quality Monitoring in the Vicinity of Demolition and Construction Sites';
- BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Noise';
- BS 5228-2:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Vibration';
- BS 7385-2:1993 'Evaluation and measurement for vibration in buildings. Guide to damage levels from ground-borne vibration';
- BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings - vibration sources other than blasting';
- relevant EURO emission standards to comply with Non-Road Mobile Machinery (Emission of Gaseous and Particulate Pollutants) Regulations 1999 as amended and NRMM London emission standards (<http://nrmm.london/>);
- the Party Wall Act 1996;
- relevant CIRIA practice notes; and
- BRE practice notes.

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: the National Planning Policy Framework 2021; Policies GG3 (Creating a Healthy City), D14 (Noise) and T7

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(Deliveries, Servicing and Construction) of the London Plan 2021; and Policies P45 (Healthy Developments), P50 (Highways Impacts), P62 (Reducing Waste), P65 (improving Air Quality), P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

## 6. CONSTRUCTION LOGISTICS PLAN

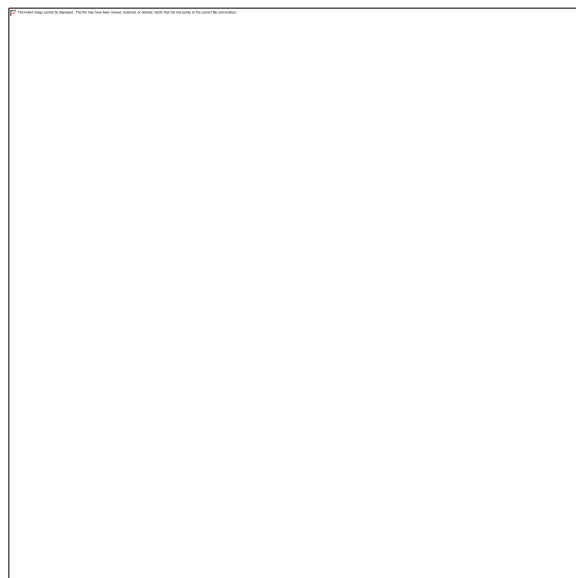
Prior to the commencement of any development (including any works of demolition) a Construction Logistics Plan developed in liaison with Transport for London to manage all freight vehicle movements to and from the site shall be submitted to and approved by the Local Planning Authority. The Construction Logistics Plan shall identify all efficiency and sustainability measures that will be taken during the main works phase of this development, and shall make firm commitments to smart procurement and collaboration (e.g. sharing suppliers) to minimise the number of construction vehicle trips.

The development shall not be carried out other than in accordance with the approved Construction Logistics Plan or any amendments thereto.

### REASON:

To ensure that construction works do not have an adverse impact on the transport network and to minimise the impact of construction activities on local air quality, in accordance with: the National Planning Policy Framework 2021; Policies GG3 (Creating a Healthy City), D14 (Noise), T6 (Assessing and Mitigating Transport Impacts) and T7 (Deliveries, Servicing and Construction) of the London Plan 2021; and Policies P45 (Healthy Developments), P50 (Highways Impacts), P65 (Improving Air Quality) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the



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Southwark Plan 2022.

**7. PILING METHOD STATEMENT**

No piling shall take place other than with the Local Planning Authority's written approval of a Piling Method Statement, in consultation with Thames Water.

The Piling Method Statement shall detail the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works.

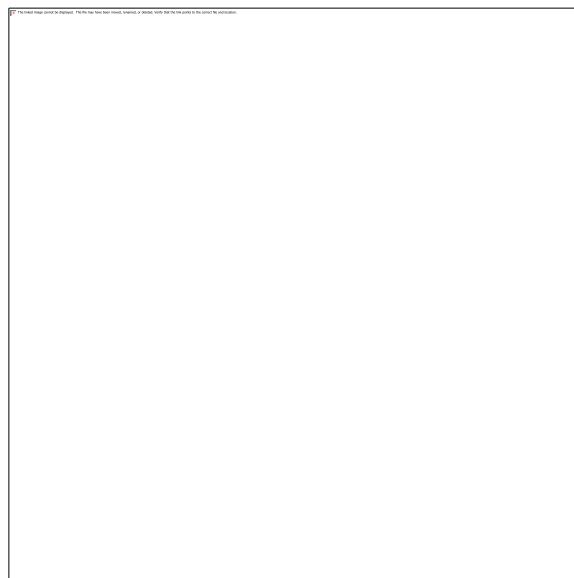
Any piling shall be undertaken in accordance with the terms of the approved Piling Method Statement.

**REASON:**

In the interests of protecting key water supply assets having regard to the close proximity of the proposed development to, and thus its potential impact on, underground water utility infrastructure, in accordance with: the National Planning Policy Framework 2021, and; Policy SI5 (Water Infrastructure) of the London Plan 2021.

**8. BUILDING RECORDING ANALYSIS AND WRITTEN SCHEME OF INVESTIGATION**

Prior to the commencement of any development (including any works of demolition) the applicant shall receive approval in writing from the Local

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Planning Authority of a programme of Building Recording Analysis (to Historic England Level 3) of the buildings on site in accordance with a Written Scheme of Investigation. The Building Recording Analysis is to be carried out by a professional heritage consultant/building recording consultant or organisation in accordance with the approved details.

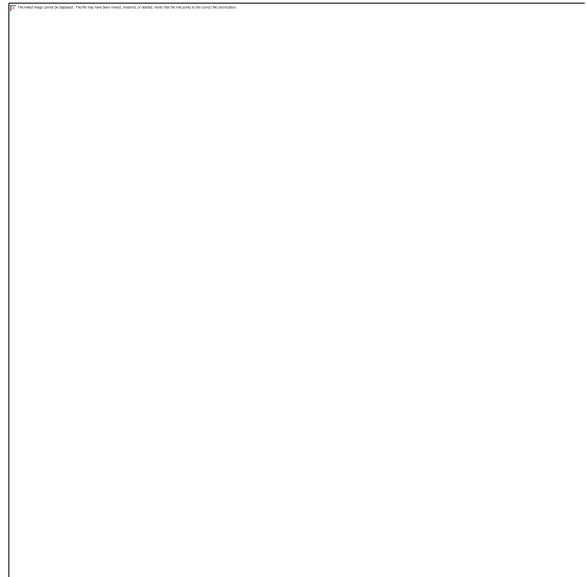
**REASON:**

To ensure that the significance of the building on site is recorded and the significance understood for future use, in accordance with: the National Planning Policy Framework 2021; Policy P25 (Local List) of the Southwark Plan 2022; and the Heritage SPD 2021.

**Permission is subject to the following Grade Condition(s)****9. SECTION DETAIL-DRAWINGS**

Before any above grade work hereby authorised begins (excluding demolition), section detail-drawings at a scale of 1:5 together with 1:50 scale context drawings through:

- i. Facades (reveals etc.) including:
  - The projecting vertical fins;
  - The canopy/awnings;
  - Junctions of exposed structural elements (columns, beams and floors);
  - Head, cills and jambs of openings;
  - Parapets and roof edges;
  - Rooftop balustrades;
- ii. Entrances (including any access sashes, security gates, entrance

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portals and awnings);

iii. Cycle store and service bay doors/shutters;

iv. Typical windows;

v. Plant screening/ enclosure;

vi. Shopfront of the restaurant/cafe unit, micro-retail unit and hotel; and

vii. Signage zones;

viii. Gates and fencing to all external spaces;

of the proposal to be constructed in the carrying out of this permission, shall be submitted to and approved in writing by the Local Planning Authority.

The development shall not be carried out other than in accordance with any such approval given.

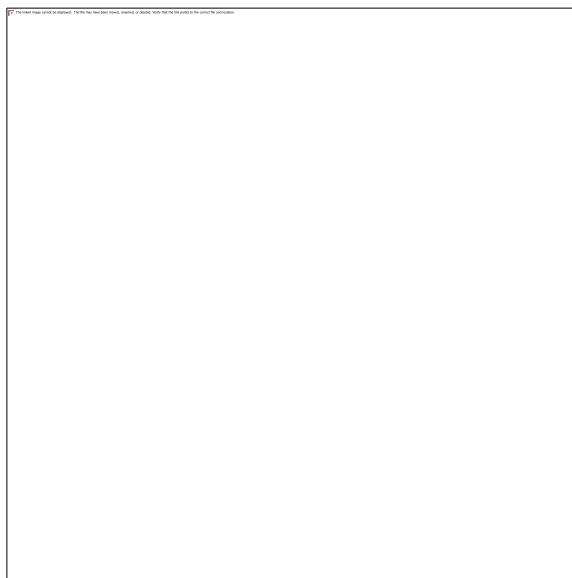
**REASON:**

In order to satisfy the Local Planning Authority that the construction details will achieve a high quality of design and detailing, are suitable in context and are consistent with the consented scheme, in accordance with: the National Planning Policy Framework 2021; Policy D4 (Delivering Good Design) of the London Plan 2021; and Policies P13 (Design of Places) and P14 (Design Quality) of the Southwark Plan 2022.

**10. MATERIALS SCHEDULE AND ON-SITE PRESENTATION OF SAMPLES**

Before any above grade work hereby authorised begins (excluding demolition):

a) the specification of each facing materials to be used in the development hereby approved shall be submitted as part of a Material Schedule to, and thereafter approved in writing by, the Local Planning

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Authority; and

b) unless otherwise agreed to by the Local Planning Suthority, a sample panel of at least 1 square metre in surface area of each external facing materials and surface finishes (including the 'Lumisty' and frosted glazing treatments) to be used in the carrying out of this permission 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.

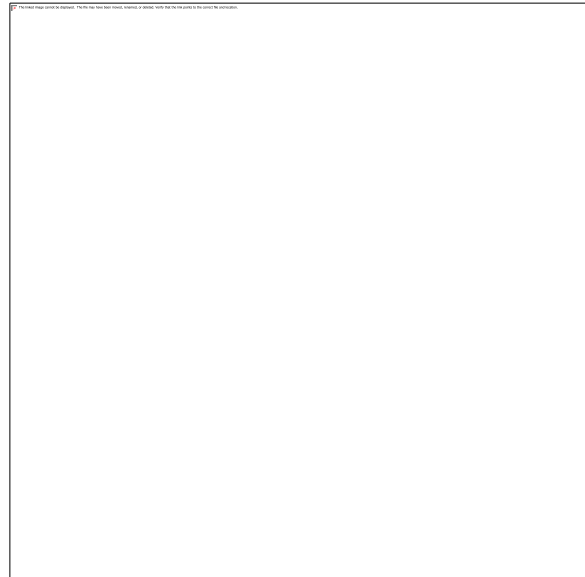
The development shall not be carried out other than in accordance with any such approval given.

**REASON:**

In order that the Local Planning Authority may be satisfied that these samples will make an acceptable contextual response in material terms, will achieve a high quality of design and detailing, and are consistent with the consented scheme, in accordance with: the National Planning Policy Framework 2021; Policy D4 (Delivering Good Design) of the London Plan 2021; and Policies P13 (Design of Places) and P14 (Design Quality) of the Southwark Plan 2022.

**11. SECURED BY DESIGN**

a) Before any above grade work hereby authorised begins (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

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from the Metropolitan Police.

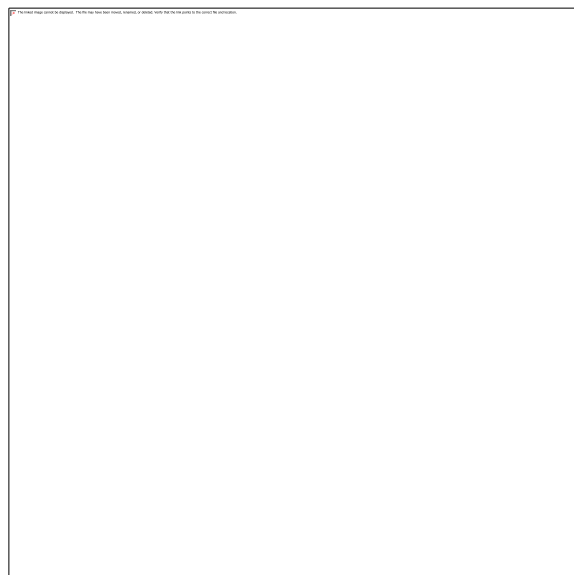
b) Prior to the first occupation of any part of the development hereby approved, confirmation that Secure by Design certification for that building has been achieved shall be submitted to and approved in writing by the Local Planning Authority.

**REASON:**

In pursuance of the Local Planning Authority's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention, in accordance with: the National Planning Policy Framework 2021; Policies D3 (Optimising Site Capacity Through the Design-led Approach), D4 (Delivering Good Design) and D11 (Safety, Security and Resilience to Emergency) of the London Plan 2021; and Policies P13 (Design of Places) and P16 (Designing Out Crime) of the Southwark Plan 2022.

**12. HARD AND SOFT LANDSCAPING**

Before any above grade work hereby authorised begins (excluding demolition), 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 access, pavements and edgings and details of any planters, greening of plant enclosures and tree pits), together with details of the green walls including a strategy for their continued maintenance and irrigation, shall be submitted to and approved in writing by the Local Planning Authority.

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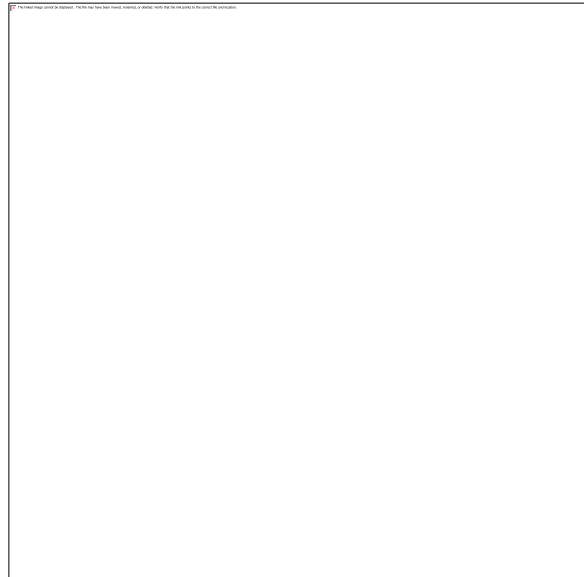
The planting shall be carried out in the first planting season following completion of building works and any trees or shrubs that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (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)'.

Prior to first occupation of any part of the development hereby approved, the green walls shall be installed strictly in accordance with the approved details and shall be maintained in accordance with the approved details thereafter. The walls shall not be used as an amenity space and shall only be used in the case of essential maintenance or repair, or escape in case of emergency.

**REASON:**

In order that the Local Planning Authority may be satisfied with the details of the landscaping scheme, and to ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2021; Policies SI 4 (Managing Heat Risk), SI 13 (Sustainable Drainage), G1 (Green Infrastructure), G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021; and Policies P13 (Design of Places), P14 (Design Quality), P56 (Protection of Amenity), P57 (Open Space), P59 (Green Infrastructure) and P60

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(Biodiversity) of the Southwark Plan 2022.

**13. GREEN ROOFS**

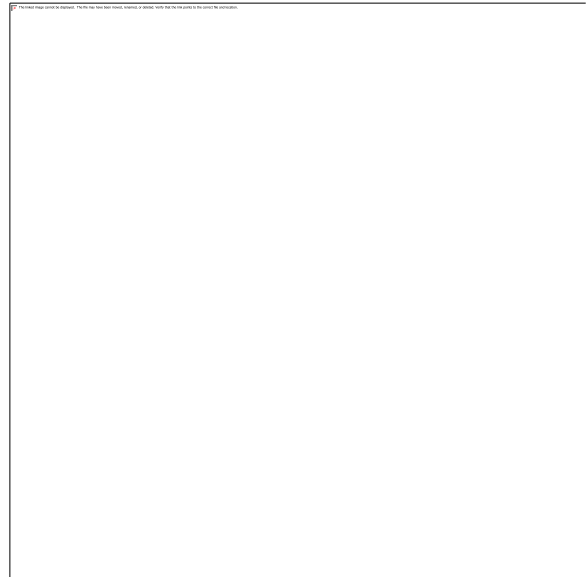
Before any above grade work hereby authorised begins (excluding demolition), details of the biodiversity roof(s) shall be submitted to and approved in writing by the Local Planning Authority. The biodiversity roof(s) shall be:

- 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 roof(s) shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency. The biodiversity roof(s) shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.

**REASON:**

To ensure the development provides the maximum possible provision towards greening, in turn helping to create and foster habitats and valuable areas for biodiversity, in accordance with: the National Planning Policy Framework 2021; Policies G1 (Green Infrastructure), G5 (Urban Greening) and G6 (Biodiversity and Access to Nature) of the London Plan 2021; and Policy P60 (Biodiversity) of the Southwark Plan 2022.

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**14. SWIFT NESTING FEATURES**

Before any above grade work hereby authorised begins (excluding demolition), details of no fewer than eighteen Swift nesting bricks shall be submitted to and approved in writing by the Local Planning Authority. The details shall include the exact location, specification and design of the eighteen habitats.

Prior to the first occupation of the building, the eighteen Swift nesting bricks shall be installed strictly in accordance with the approved details. Once completed, all eighteen habitats shall be maintained as such thereafter.

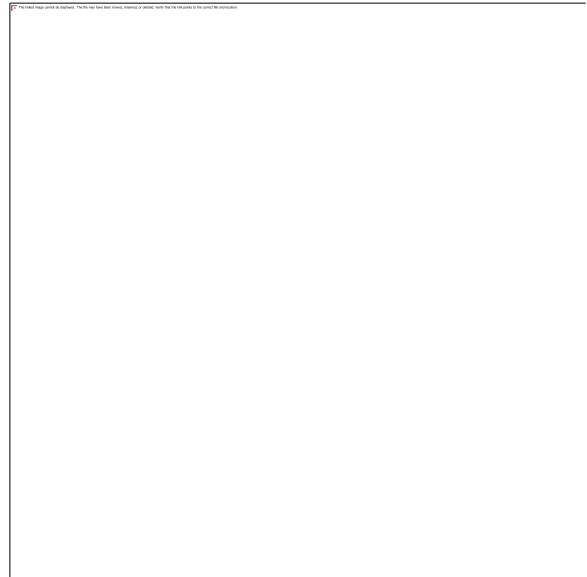
**REASON:**

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with: the National Planning Policy Framework 2021; Policy G6 (Biodiversity and Access to Nature) of the London Plan 2021; and Policy P60 (Biodiversity) of the Southwark Plan 2022.

**Permission is subject to the following Pre-Occupation Condition(s)****15. BREEAM CERTIFICATION**

a) Before the first occupation of any part of the development hereby approved, an interim report/letter (together with any supporting evidence) from the licensed BREEAM assessor shall be submitted to and approved in writing by the Local Planning Authority. The report/letter shall confirm that



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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 the agreed 'Excellent' BREEAM Standards.

b) Within six months of first occupation of the development 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 'Excellent' BREEAM standards have been met.

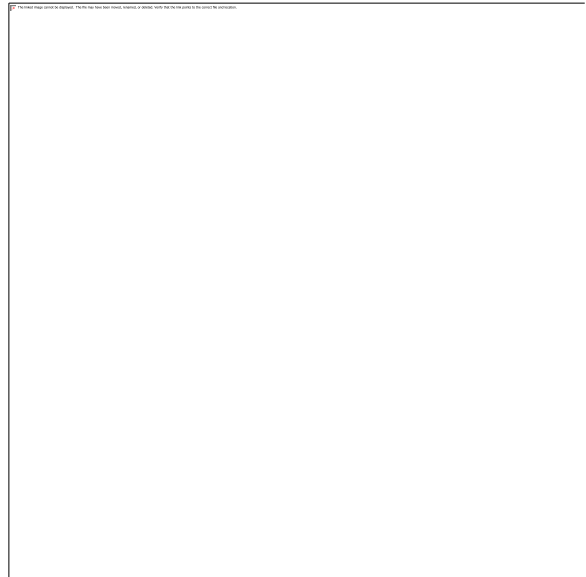
**REASON:**

To ensure the proposal complies with: the National Planning Policy Framework 2021; Policy SI2 (Minimising Greenhouse Gas Emissions) of the London Plan 2021; and Policies SP6 (Climate Emergency) and P69 (Sustainability Standards) of the Southwark Plan 2022.

**16. URBAN GREENING CERTIFICATION**

a) Before the first occupation of any part of the development hereby approved, 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 Local Planning Authority. 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 the agreed UGF score of 0.40.

b) Within six months of first occupation of the development hereby

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permitted, a post construction certificate prepared by a suitably qualified landscape specialist (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 UGF score of 0.40 has been met.

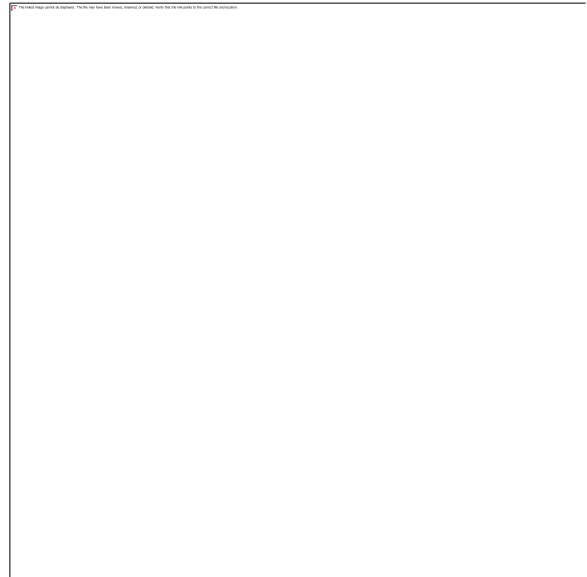
**REASON:**

To ensure the proposal complies delivers the agreed UGF score, in accordance with: the National Planning Policy Framework 2021; Policy G5 (Urban Greening) of the London Plan 2021; and Policies SP6 (Climate Emergency), P13 (Design of Places), P59 (Green Infrastructure), P60 (Biodiversity) and P65 (Improving Air Quality) of the Southwark Plan 2022.

**17. PLANT NOISE**

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

Following the installation of the plant and its mitigating measures, a Validation Test shall be carried out to ensure that the Specific plant sound level shall be 10dB(A) or more below the background sound level in this location. The results shall be submitted to the Local Planning Authority for approval in writing. The plant and equipment shall be installed and constructed, and shall be permanently maintained thereafter.

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To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with: the National Planning Policy Framework 2021; Policy D14 (Noise) of the London Plan 2022; and Policies P56 (Protection of Amenity) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

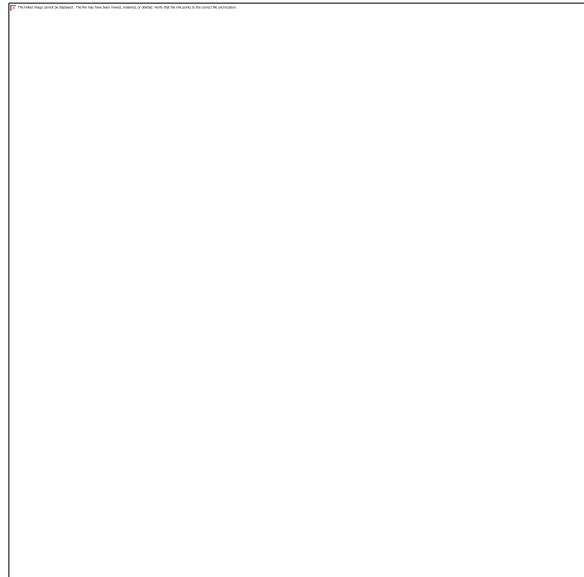
**18. FINAL DELIVERY AND SERVICING MANAGEMENT PLAN**

Before the first occupation of any part of the development hereby approved, a Final Delivery and Servicing Management Plan (DSP) detailing how all parts of the site are to be serviced shall be submitted to and approved in writing by the Local Planning Authority. The Final DSP shall be based on the principles set out in the Outline Delivery and Servicing Management Plan (ref: Delivery and Servicing Plan - Dated July 2021- produced by Caneparo Associates).

The Final DSP shall set out the predicted distribution of deliveries to the site on an hourly basis across the 12-hour period from 8AM to 8PM weekdays.

Consolidation of deliveries through this development's facilities management and/or off-site consolidation centres plus 'just in time' deliveries, in accordance with Transport for London's guidance, is encouraged.

The development shall not be carried out other than in accordance with the approval given.

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To ensure compliance with: the National Planning Policy Framework 2021; Policies T6 (Assessing and Mitigating Transport Impacts) and T7 (Deliveries, Servicing and Construction) of the London Plan 2021; and Policies P50 (Servicing), P62 (Reducing Waste) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

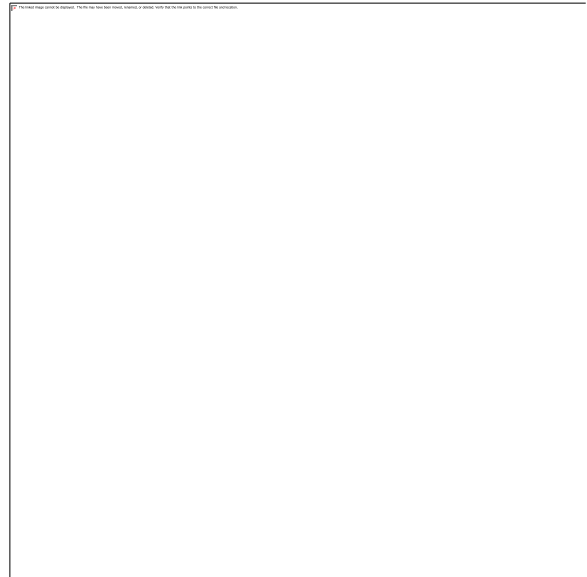
**19. TRAVEL PLAN AND TRANSPORT METHODS SURVEY**

a) Before the first occupation of any part of the development hereby approved, a Final Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall set out the measures to be taken to encourage the use of modes of transport other than the car by all users of the building, and shall give particular focus to active travel measures. The Final Travel Plan shall be based on the principles set out in the Draft Travel Plan (ref: 103354 - Draft Travel Plan - Dated July 2021 - Produced by Caneparo Associates).

b) At the start of the second year of operation of the approved Final Travel Plan, a detailed Transport Methods Survey showing:

- the methods of transport used by all those users of the development to and from the site;
- how those results compares with the methods envisaged in the Final Travel Plan; and
- any additional measures to be taken to encourage the use of public transport, walking and cycling to the site;

shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out other in accordance

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with any such approval given.

**REASON:**

In order that the use of non-car based travel is encouraged in accordance with: the National Planning Policy Framework 2021; Policies GG3 (Creating a Healthy City), T4 (Assessing and Mitigating Transport Impacts) of the London Plan 2021, and; Policies P45 (Healthy Developments), P50 (Highways Impacts), P51 (Walking) and P53 (Cycling) of the Southwark Plan 2022.

**20. ELECTRICAL VEHICLE CHARGING POINTS**

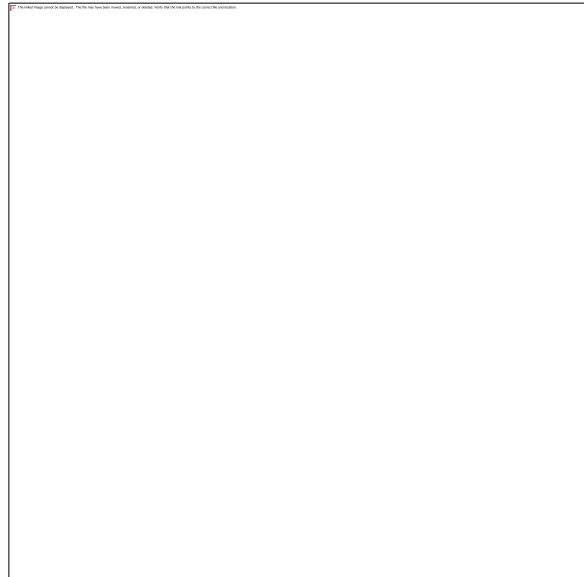
Before the first occupation of any part of the development hereby approved, details of the installation (including location and type) of one electric vehicle charger point to serve the Blue Badge parking space within the internal loading bay, shall be submitted to and approved in writing by the Local Planning Authority.

The approved electric vehicle charger points shall be installed prior to occupation of any part of the development.

The development shall not be carried out other than in accordance with any such approval given.

**REASON:**

To encourage more sustainable travel, in accordance with: The National Planning Policy Framework 2021; Policy T6 (Car Parking) of the London Plan 2021; and Policy P54 (Car Parking) of the Southwark Plan 2022.

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Before the first occupation of any part of the development hereby approved, a Final External Lighting and Security Surveillance Equipment Strategy shall be submitted to and approved in writing by the Local Planning Authority. The Strategy shall provide details of:

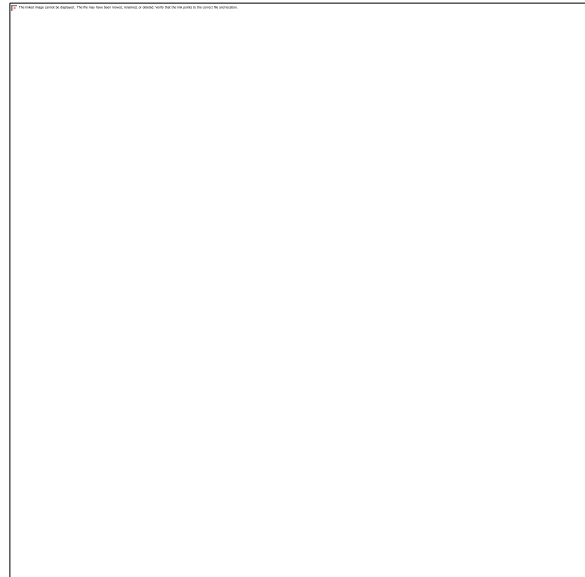
- all external lighting (including design, power and position of luminaries, and any dim-down and turn-off times); and
- the security surveillance equipment to be installed on the building and within all external areas at all levels of the building.

All the external lighting proposed by the Final External Lighting and Security Surveillance Equipment Strategy shall demonstrate compliance with the Institute of Lighting Professionals Guidance Note 01/20 'Guidance notes for the reduction of obtrusive light'.

The development shall not be carried out other than in accordance with the approved Final External Lighting and Security Surveillance Equipment Strategy.

**REASON:**

In order that the Local Planning Authority may be satisfied as to the details of the development in the interest of the visual amenity of the area, the safety and security of persons using the area and the amenity and privacy of adjoining occupiers in accordance with: the National Planning Policy Framework 2021; Policies D3 (Optimising Site Capacity Through the Design-led Approach), D4 (Delivering Good Design), D8 (Public Realm), D9

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(Tall Buildings), D14 (Designing Out Crime) and D11 (Safety, Security and Resilience to Emergency) of the London Plan 2021; and Policies P13 (Design of Places), P56 (Protection of Amenity) and P16 (Designing Out Crime) of the Southwark Plan 2022.

## 22. PROVISION AND RETENTION OF 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.

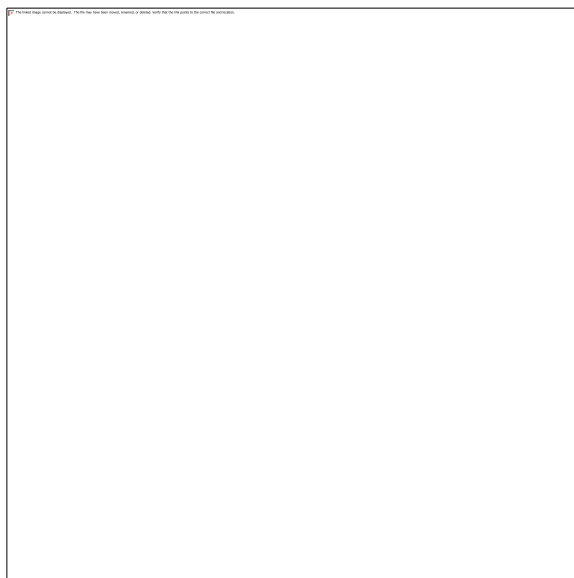
The refuse storage facilities shall thereafter be retained and the space used for no other purpose.

### 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; Policies SI7 (Reducing Waste and Supporting the Circular Economy) and T7 (Deliveries, Servicing and Construction) of the London Plan 2021; and Policies P45 (Healthy Developments), P50 (Highways Impacts), P56 (Protection of Amenity) and P62 (Reducing Waste) of the Southwark Plan 2022.

## 23. REGULATION OF AMPLIFIED NOISE FROM NON-RESIDENTIAL PREMISES

- a) Before the first occupation of any part of the development hereby

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approved, a Scheme of Sound Insulation shall be submitted to and approved in writing by the Local Planning Authority. The Scheme of Sound Insulation shall ensure that the LFmax sound from amplified and non-amplified music and speech shall not exceed the lowest L90 5min at 1m from the facade of nearby residential premises at all third octave bands between 63Hz and 8kHz. The development shall be constructed in accordance with the approval given and the Scheme of Sound Insulation shall be permanently maintained thereafter.

b) Following completion and prior to first use of the development hereby consented, a Validation Test shall be carried out and the results shall be submitted to and approved in writing by the Local Planning Authority.

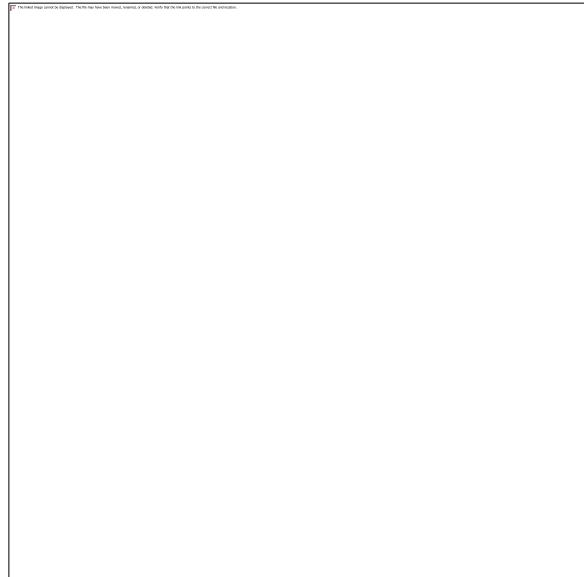
**REASON:**

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities associated with non-residential premises in accordance with: the National Planning Policy Framework 2021; Policies T6 (Assessing and Mitigating Transport Impacts) and T7 (Deliveries, Servicing and Construction) of the London Plan 2021; and Policies P50 (Servicing), P62 (Reducing Waste) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

**24. HOURS OF USE: RETAIL UNIT**

The retail use on Level 00 of the development hereby consented (annotated as "cafe/restaurant" on approved drawing '1901-LAT\_XX\_GF\_M2\_A\_15103-S4\_P01 - Issue 1 - PROPOSED PLAN LEVEL 0 - Dated 02.07.2021') shall not be open to:



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- visiting members of the public outside of 07:00hrs to 23:00hrs on Mondays to Sundays;
- hotel guests outside of 06:00hrs to 23:00hrs on Mondays to Sundays.

**REASON:**

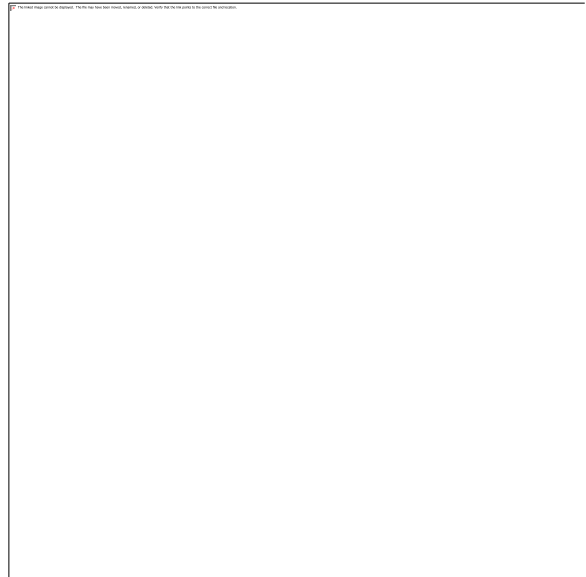
To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance, in accordance with: the National Planning Policy Framework 2021; Policy D14 (Noise) of the London Plan 2021; P56 (Protection of Amenity) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

**25. HOURS OF USE: MICRO RETAIL UNIT**

The micro retail unit on Level 00 of the development hereby consented (annotated as "cafe/restaurant" on the approved drawing '1901-LAT\_XX\_GF\_M2\_A\_15103-S4\_P01 - Issue 1 - PROPOSED PLAN LEVEL 0 - Dated 02.07.2021') shall not be carried on outside of 07:00hrs to 22:00hrs on Mondays to Sundays.

**REASON:**

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance, and having given special regard to the micro retail unit's open (servery-style) relationship to the public footway, in accordance with: the National Planning Policy Framework 2021; Policy D14 (Noise) of the London Plan 2021; P56 (Protection of Amenity) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

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A maximum of two deliveries to each use (hotel, offices, food and beverage retail) within the development hereby approved shall be permitted between the 'early morning hours' set out below and shall be made by vehicles no larger than a 7.5t box van / 8m vehicle:

- 07:00 to 08:00 on Monday to Fridays;
- 07:00 to 09:00 on Saturdays;
- 07:00 to 10:00 on Sundays.

All deliveries or collections to the development hereby approved, other than those permitted during the 'early morning hours' described above, shall be between the following hours only:

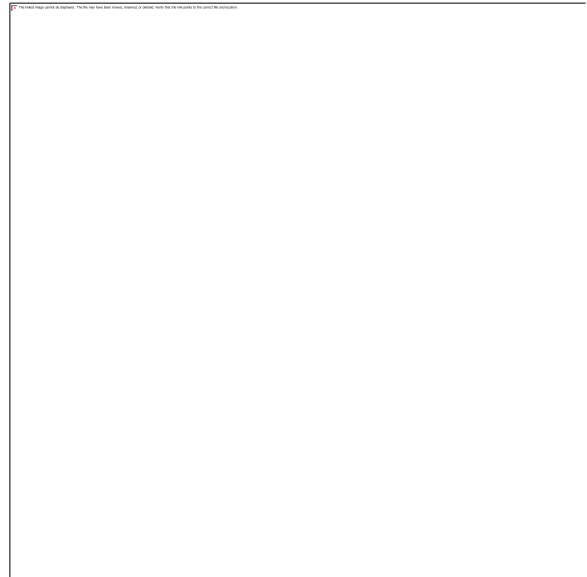
- 09:00 to 20:00 on Monday to Fridays;
- 09:00 to 18:00 on Saturdays; and
- 10:00 to 16:00 on Sundays.

**REASON:**

To safeguard the amenity of neighbouring residential properties in accordance with: the National Planning Policy Framework 2021; Policies D14 (Noise) of the London Plan 2021 and T7 (Deliveries, Servicing and Construction) of the London Plan 2021; and Policy P56 (Protection of Amenity) of the Southwark Plan 2022.

**27. FIRE SAFETY STRATEGY COMPLIANCE**

The development shall not be carried out other than in accordance with approved document '55419-CBD-00-ZZ-RP-F-5700 - Revision 01 - Dated

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02.07.2022 - Produced by Chapman BDSP'.

**REASON:**

To minimise the risk to life and minimise building damage in the event of a fire, in accordance with: the National Planning Policy Framework 2021; and Policies D11 (Safety, Security and Resilience to Emergency) and D12 (Fire Safety) of the London Plan 2021.

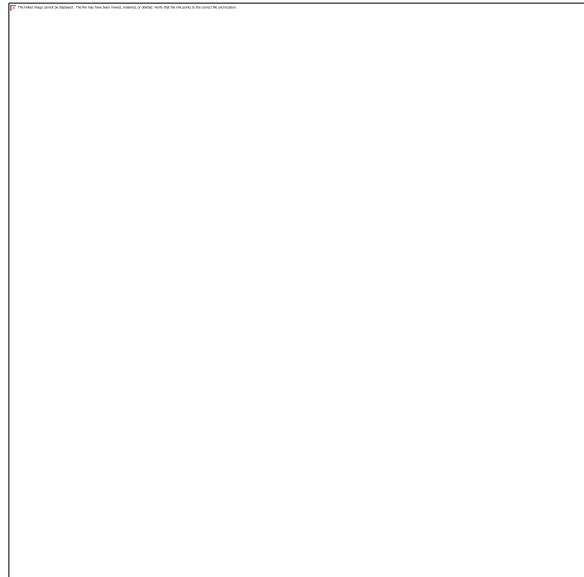
**28. FLOOD RESILIENCE AND MITIGATION**

The development hereby approved shall be carried out in accordance with the flood resilience and mitigation measures set out in the approved Flood Management Plan, which comprises the following documents:

- 'Flood Risk Assessment and Drainage Report - Ref No. 9235 - Rev 4 - Dated July 2022 - Produced by Price and Myers';
- 'EMAIL FROM PLANNING AGENT TO CASE OFFICER, TO SUPPLEMENT 'FLOOD RISK ASSESSMENT AND DRAINAGE REPORT - REV 4 - DATED JULY 2022' - No reference number - No revision/version number - Dated 13 September 2022 - Produced by DP9'.

**REASON:**

To minimise the risk to life and minimise building damage in a flood event, in accordance with: the National Planning Policy Framework 2021; Policy S112 (Flood Risk Management) of the London Plan 2021; Policies SP6 (Climate Emergency) and P68 (Reducing Flood Risk) of the Southwark Plan 2022; and the Southwark Strategic Flood Risk Assessment 2017.

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The development hereby approved shall be carried out in accordance with the approved Drainage Strategy, which comprises the following documents:

- 'Flood Risk Assessment and Drainage Report - Ref No. 9235 - Rev 4 - Dated July 2022 - Produced by Price and Myers';
- 'EMAIL FROM PLANNING AGENT TO CASE OFFICER, TO SUPPLEMENT 'FLOOD RISK ASSESSMENT AND DRAINAGE REPORT - REV 4 - DATED JULY 2022' - No reference number - No revision/version number - Dated 13 September 2022 - Produced by DP9'.

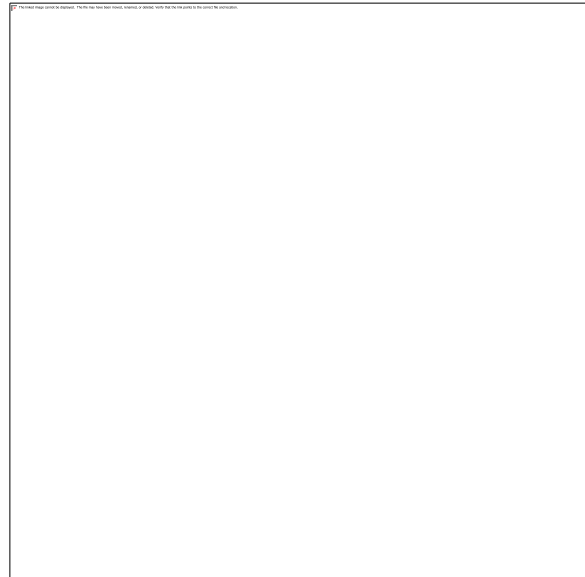
**REASON:**

To ensure the development is designed safely in reference to flood risk and sustainable urban drainage in accordance with: the National Planning Policy Framework 2021; Policies SI12 (Flood Risk Management) and SI13 (Sustainable Urban Drainage) of the London Plan 2021; Policies SP6 (Climate Emergency) and P68 (Reducing Flood Risk) of the Southwark Plan 2022; and the Southwark Strategic Flood Risk Assessment 2017.

**30. WHEELCHAIR-ACCESSIBLE HOTEL ROOMS**

A minimum of 10 hotel rooms shall be designed, constructed and fully fitted-out to wheelchair-accessible standards, as prescribed by:

- 'BS 8300-2:2018 - Design of an Accessible and Inclusive Built Environment - Code of Practice' (and requiring specific accordance with Figure 52 incorporating either Figure 30 or 33 of the Code of Practice); and
- 'Building Regulations Approved Document M (Vol 2)'.

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Unless otherwise agreed in writing with the Local Planning Authority, the wheelchair accessible hotel rooms shall be:

- the two west-facing rooms on Level 04;
- the two west-facing rooms on Level 06;
- the two west-facing rooms on Level 08;
- the two west-facing rooms on Level 10;
- the two west-facing rooms on Level 12;

and which are denoted as "Accessible Hotel Room" on approved drawing '1901-LAT-XX-04-M2-A-15107-S4-P01 - PROPOSED PLAN LEVELS 4, 6, 8, 10 & 12 - Issue 1 - Dated 02.07.2021'.

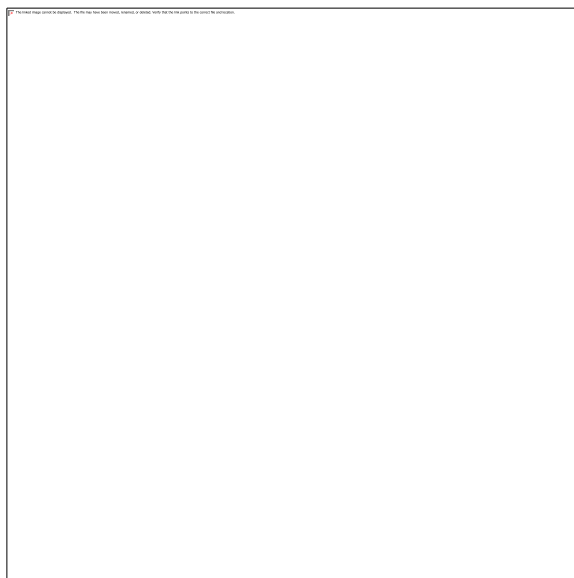
All wheelchair-accessible rooms shall be made available from first occupation, and retained as such for as long as the hotel is in use.

**REASON:**

To ensure the provision of adequate means of access to the hotel for people with disabilities or those who are mobility impaired, in accordance with: the National Planning Policy Framework 2021; Policy E10 (Visitor Infrastructure) of the London Plan 2021, and; Policies P13 (Design of Places) and P14 (Design Quality) of the Southwark Plan 2022.

**31. RESTRICTION: NO INSTATEMENT OF APPURTENANCES**

No meter boxes, flues, vents or pipes (other than rainwater pipes) or other appurtenances not shown on the approved drawings shall be fixed or installed on the elevations of the buildings, unless otherwise approved by the Local Planning Authority.

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To ensure such works do not detract from the appearance of the buildings in accordance with: 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 P56 (Protection of Amenity) of the Southwark Plan 2022.

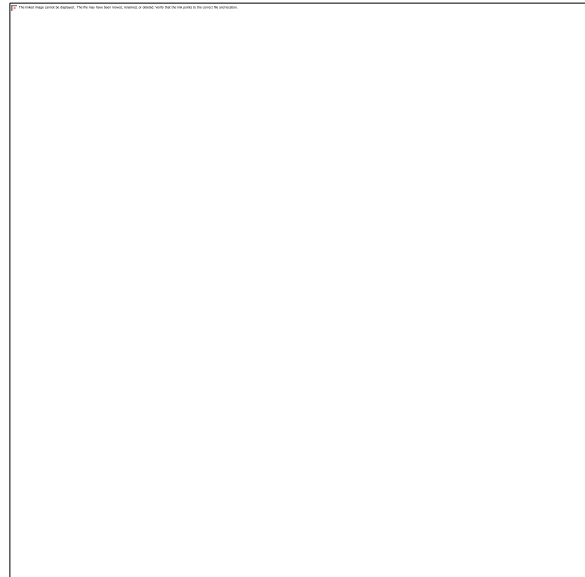
**32. RESTRICTION: NO INSTATEMENT OF ROOF PLANT AND OTHER ROOF STRUCTURES**

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 permission, 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 enclosure 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; Policy D4 (Delivering Good Design) of the London Plan 2021; and Policies P13 (Design of Places), P14 (Design Quality) and P56 (Protection of Amenity) of the Southwark Plan 2022.

**33. RESTRICTION: NO INSTATEMENT OF TELECOMMUNICATIONS EQUIPMENT**

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Notwithstanding the provisions of Schedule 2, Part 16 of the Town & Country Planning (General Permitted Development) (England) Order 2015 [as amended or re-enacted] no external telecommunications equipment or structures shall be placed on the roof or any other part of a building hereby permitted, unless otherwise approved by the Local Planning Authority.

**REASON:**

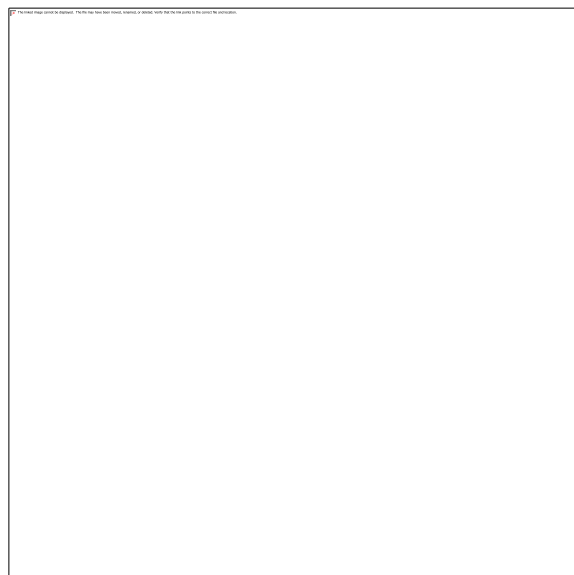
In order to ensure that no telecommunications plant or equipment which might be detrimental to the design and appearance of the building and visual amenity of the area is installed on the roof of the building in accordance with: the National Planning Policy Framework 2021; Policy D4 (Delivering Good Design) of the London Plan 2021; and Policies P13 (Design of Places), P14 (Design Quality) and P56 (Protection of Amenity) of the Southwark Plan 2022.

**34. RESTRICTION: WEST ELEVATION GLAZING TO BE OBSCURED AND FIXED SHUT**

Part of the glazing on the south and west elevations of the approved building shall be obscure glazed and fixed-shut in compliance with drawing ref 1901-LAT-ZZ-ZZ-DR-A-SK100-S4-P01 and shall not be replaced or repaired other than with fixed-shut glazing of a treatment matching that, and to the height as, depicted in the approved drawing 1901-LAT-ZZ-ZZ-DR-A-SK100-S4-P01.

**REASON:**

In order to protect the privacy and amenity of the occupiers and users of the

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nearby properties to the west from undue overlooking, in accordance with: the National Planning Policy Framework 2021; and Policy P56 (Protection of Amenity) of the Southwark Plan 2022.

### 35. DIGITAL CONNECTIVITY INFRASTRUCTURE STRATEGY

The development shall be carried out and maintained as such thereafter in perpetuity in accordance with the approved digital connectivity infrastructure strategy, the reference for which is:

- Digital Connectivity Strategy - No reference number - No revision/version - Dated 20 February 2023 - Produced by DP9

#### REASON:

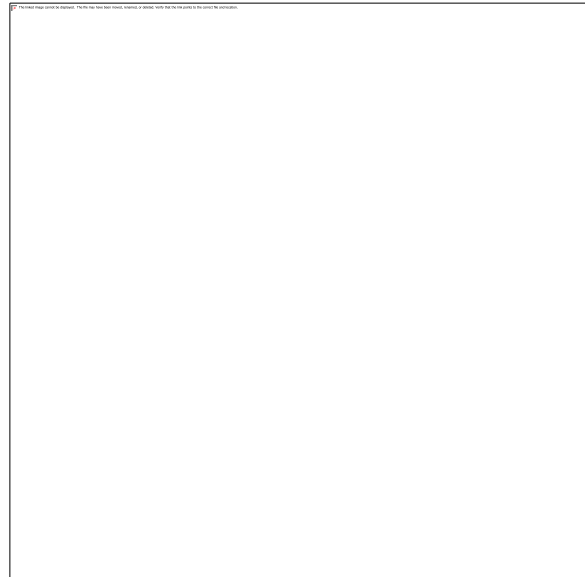
To provide high quality digital connectivity infrastructure to contribute to London's global competitiveness, in accordance with: the National Planning Policy Framework 2021; Policy SI6 (Digital Connectivity Infrastructure) of the London Plan 2021; and P44 (Broadband and Digital Infrastructure) of the Southwark Plan 2022.

### **Permission is subject to the following Special Condition(s)**

### 36. POST-CONSTRUCTION WHOLE LIFE-CYCLE CARBON REPORTING

Upon the completion of the as-built design and upon commencement of RIBA Stage 6, but prior to the building being occupied (or handed over to a new owner, if applicable), the legal owner(s) of the development shall submit the Post-Construction Whole Life-Cycle Carbon Assessment (Post-



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Construction WLCA) to the GLA.

The Post-Construction WLCA shall be submitted to [ZeroCarbonPlanning@london.gov.uk](mailto:ZeroCarbonPlanning@london.gov.uk). The owner should use the post construction tab of the GLA's WLC assessment template and this should be completed accurately and in its entirety, in line with the criteria set out in the GLA's Whole Life-Cycle Carbon Assessments LPG.

The Post-Construction WLCA should provide an update of the information submitted at planning stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the GLA's Whole Life-Cycle Carbon Assessments LPG and should be received no later than three months post as-built design completion, unless otherwise agreed.

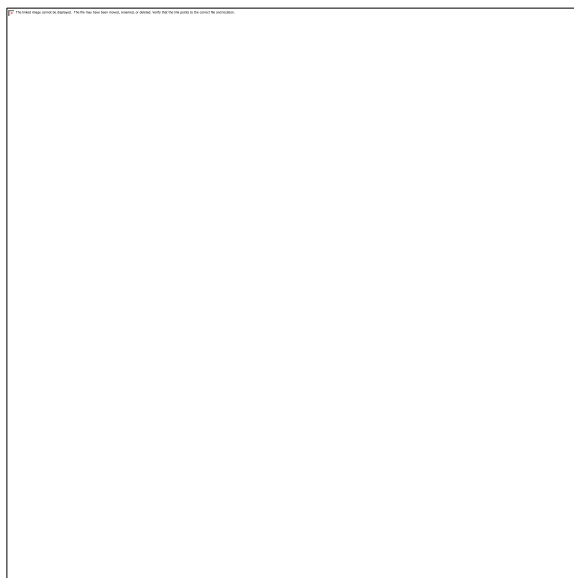
**REASON:**

To ensure whole life-cycle carbon is calculated and reduced, and to demonstrate compliance with: the National Planning Policy Framework 2021; and Policy SI 2 (Minimising Greenhouse Gas Emissions) of the London Plan 2021; and Policy P70 (Energy) of the Southwark Plan 2022.

**37. POST-COMPLETION CIRCULAR ECONOMY REPORTING**

No later than three months following substantial completion of the development hereby consented:

- a) a Post-Completion Circular Economy Report setting out the predicted and actual performance against all numerical targets in the Planning Stage

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Circular Economy Statement shall be submitted to the GLA at [CircularEconomyLPG@london.gov.uk](mailto:CircularEconomyLPG@london.gov.uk), along with any supporting evidence as per the GLA's Circular Economy Statements LPG; and

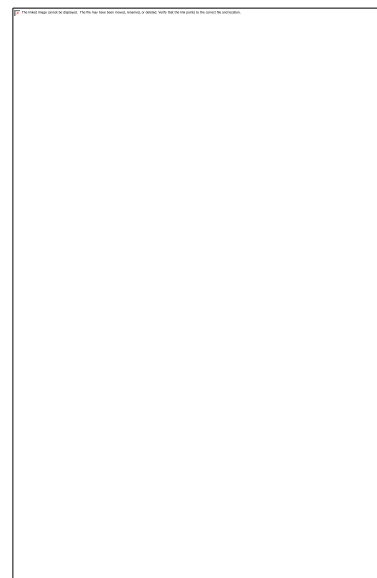
b) confirmation of submission of the Post-Completion Circular Economy Report shall be submitted to the Local Planning Authority for approval in writing.

**REASON:**

To ensure that Planning Stage Circular Economy Statement has been implemented in the construction and delivery of the development, and that all on-going operational measures and mechanisms have been satisfactorily implemented, in order to achieve Circular Economy goals and in accordance with: the National Planning Policy Framework 2021; and Policies GG6 (Increasing Efficiency and Resilience) and SI7 (Reducing Waste and Supporting the Circular Economy) of the London Plan 2021; and Policy P62 (Reducing Waste) of the Southwark Plan 2022.

**Signed:**                    *Stephen Platts*

Director of Planning and Growth

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**Informative Notes to Applicant Relating to the Proposed Development**


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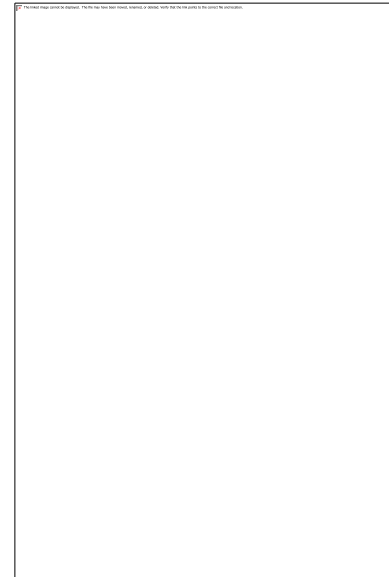
## 1. FIRE RISK ASSESSMENT/STATEMENT

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

The fire risk assessment/statement covers matters required by planning policy. This is in no way a professional technical assessment of the fire risks presented by the development. The legal responsibility and liability lies with the 'responsible person', the responsible person being the person who prepares the fire risk assessment/statement not planning officers who make planning decisions.

## 2. INFORMATIVE FROM HEATHROW AIRPORT SAFEGUARDING TEAM: CONSTRUCTION AVIATION WARNING LIGHTS

Although it is not anticipated that the use of a crane at this site will impact

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Heathrow's Obstacle Limitation Surfaces, Instrument Flight Procedures or radar, the Safeguarding Team would like to advise the developer that if a crane is required for construction purposes, then red static omnidirectional lights will need to be applied at the highest part of the crane and at the end of the jib if a tower crane, as per the requirements set out by CAP1096. This can accessed via:

<https://publicapps.caa.co.uk/modalapplication.aspx?appid=11&mode=detail&id=5705>

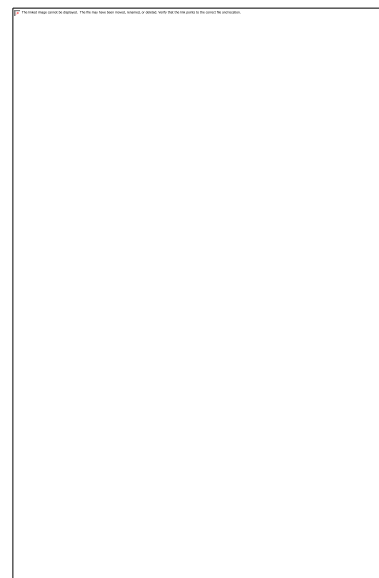
3. **INFORMATIVE FROM THAMES WATER REGARDING WASTE WATER: WORKING NEAR OR DIVERTING PIPES**

Please read the Thames Water guide 'Working Near Our Assets' to ensure any works carried out will be in line with the necessary processes if working above or near Thames Water pipes or other structures. This can be accessed from: <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 on: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk).

4. **INFORMATIVE FROM THAMES WATER REGARDING WASTE WATER: DISCHARGING TO A PUBLIC SEWER**

Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should further information be required, please refer to Thames Water's website:

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<https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services>.

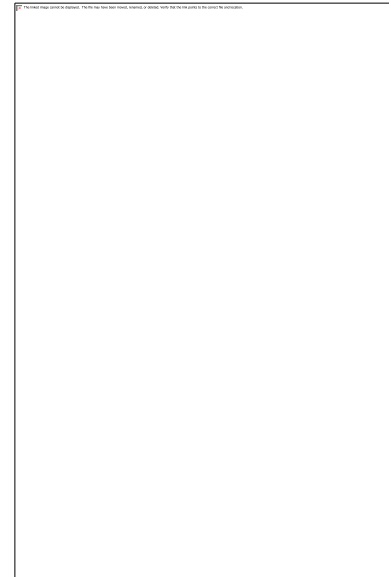
5. **INFORMATIVE FROM THAMES WATER REGARDING WASTE WATER:  
INSTALLATION OF PETROL / OIL INTERCEPTORS**

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

6. **INFORMATIVE FROM THAMES WATER REGARDING WASTE WATER:  
GREASE REMOVAL MEASURES**

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

7. **INFORMATIVE FROM THAMES WATER REGARDING WASTE WATER:**

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**GROUNDWATER RISK MANAGEMENT PERMIT**

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. Thames Water would expect the developer to demonstrate what measures will be undertaken 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](mailto:trade.effluent@thameswater.co.uk). Application forms should be completed online via [www.thameswater.co.uk](http://www.thameswater.co.uk). Please refer to the 'Wholesale', 'Business Customers' and/or 'Groundwater Discharges' sections (as applicable) of Thames Water's website for further information: [www.thameswater.co.uk/help](http://www.thameswater.co.uk/help)

**8. INFORMATIVE FROM THAMES WATER REGARDING POTABLE WATER:  
ADVANCE NOTICE OF MAINS WATER USAGE FOR CONSTRUCTION**

If the developer intends to use mains water for construction purposes, Thames Water must be informed in advance to avoid potential fines for improper usage. More information and how to apply can be found online at: [thameswater.co.uk/buildingwater](http://thameswater.co.uk/buildingwater).

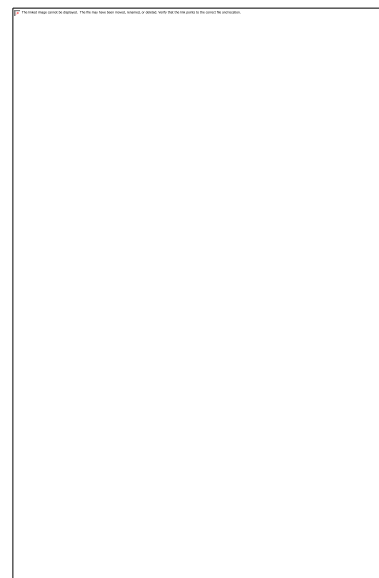
**9. INFORMATIVE FROM THAMES WATER REGARDING POTABLE WATER:  
MINIMUM PRESSURE AND FLOW RATE**

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 Water's pipes. The developer should take account of this

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minimum pressure in the design of the proposed development.

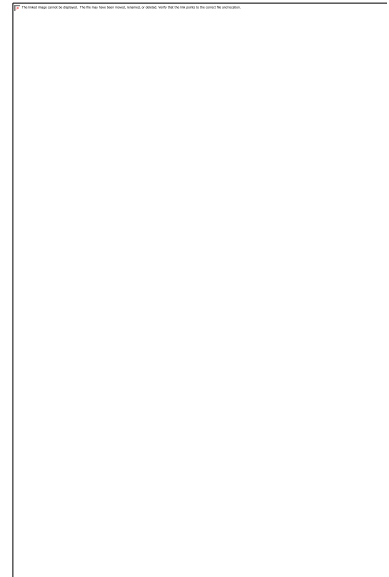
### 10. FROM TRANSPORT FOR LONDON: BAKERLOO LINE EXTENSION SAFEGUARDING GUIDANCE

Applicants should refer to the 'Bakerloo Line Extension Information for Developers' available at <https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/bakerloo-line-extension>. TfL will provide further guidance in relation to the proposed location of the Bakerloo Line Extension structures and tunnels, ground movement arising from the construction of the tunnels and noise and vibration arising from the use of the tunnels. Applicants are encouraged to contact the Bakerloo line Extension Safeguarding Manager in the course of preparing detailed design and method statements.

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### Important Notes Relating to the Council's Decision

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#### 1. Conditions

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

- Further information about how to comply with planning conditions can be found at:

[https://www.planningportal.co.uk/info/200126/applications/60/consent\\_types/12](https://www.planningportal.co.uk/info/200126/applications/60/consent_types/12)

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

[https://www.planningportal.co.uk/info/200207/appeals/108/types\\_of\\_appeal](https://www.planningportal.co.uk/info/200207/appeals/108/types_of_appeal)

#### 2. Community Infrastructure Levy (CIL) Information

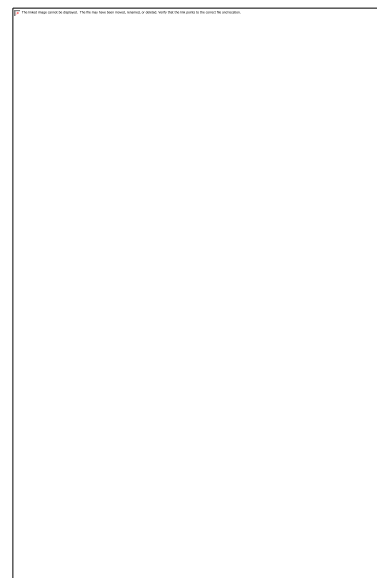
- If your development has been identified as being liable for CIL you need to email [Form 1: CIL Additional Information](#), [Form 2: Assumption of Liability](#) and [Form 6: Commencement Notice](#) to [cil.s106@southwark.gov.uk](mailto:cil.s106@southwark.gov.uk) as soon as



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possible, so that you can be issued with a Liability Notice. This should be done at least a day before commencement of the approved development.

- **Payment of the CIL charge is mandatory and the CIL Regulations comprises a range of enforcement powers and penalties for failure to following correct procedures to pay, including stop notices, surcharges, late payment interests and prison terms.**
- To identify whether your development is CIL liable, and further details about CIL including eligibility and procedures for any CIL relief claims, please see the Government's CIL guidance:  
  
<https://www.gov.uk/guidance/community-infrastructure-levy>
- All CIL Forms are available to download from Planning Portal:  
  
[https://www.planningportal.co.uk/info/200136/policy\\_and\\_legislation/70/community\\_infrastructure\\_levy/5](https://www.planningportal.co.uk/info/200136/policy_and_legislation/70/community_infrastructure_levy/5)
- Completed forms and any CIL enquiries should be submitted to [cil.s106@southwark.gov.uk](mailto:cil.s106@southwark.gov.uk)

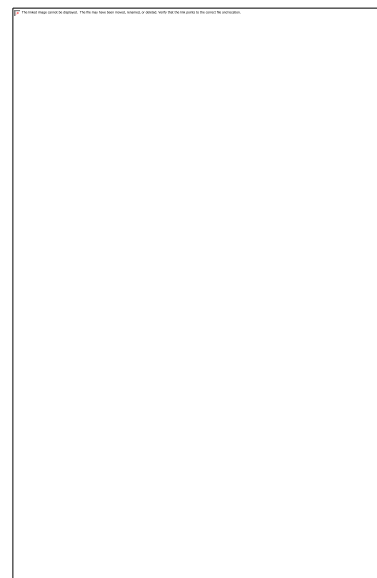
### 3. National Planning Policy Framework

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

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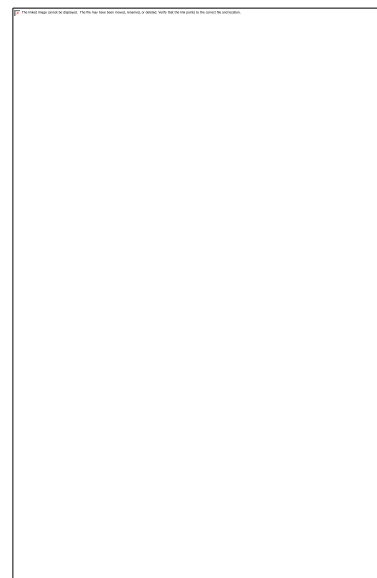
### 4. Appeals to the Secretary of State

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

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

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

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

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- Further details are on GOV.UK (<https://www.gov.uk/government/collections/casework-dealt-with-by-inquiries>).

**5. Purchase Notice**

- If either the local planning authority or the Secretary of State grants permission subject to conditions, the owner may claim that the land can neither be put to a reasonably beneficial use in its existing state nor made capable of reasonably beneficial use by the carrying out of any development which has been or would be permitted. In these circumstances the owner may serve a purchase notice on the Council requiring the Council to purchase the owner's interest in the land in accordance with Part VI of the Town and Country Planning Act 1990

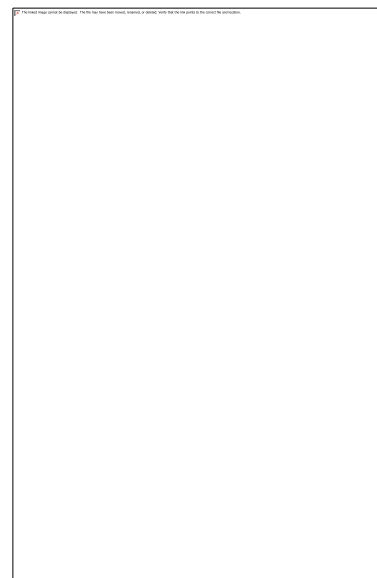
**6. Provisions for the Benefit of the Disabled**

- Applicants are reminded that account needs to be taken of the statutory requirements of the Disability Discrimination Act 1995 to provide access and facilities for disabled people where planning permission is granted for any development which provides:
  - i. Buildings or premises to which the public are to be admitted whether on payment or otherwise. [Part III of the Act].
  - ii. Premises in which people are employed to work as covered by the Health and Safety etc At Work Act 1974 and the Management of Health and Safety at Work Regulations as amended 1999. [Part II of the Act].
  - iii. Premises to be used as a university, university college or college, school or hall of a university, or intended as an institution under the terms of the Further and Higher Education Act 1992. [Part IV of the Act].

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- Attention is also drawn to British Standard 8300:2001 Disability Access, Access for disabled people to schools buildings – a management and design guide. Building Bulletin 91 (DfEE 99) and Approved Document M (Access to and use of buildings) of the Building Regulations 2000 or any such prescribed replacement.

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

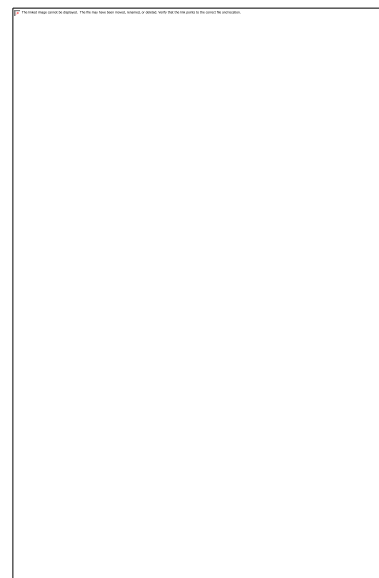
- The granting of approval of a reserved matter or outstanding matter does not relieve developers of the necessity for complying with any Local Acts, regulations, building by-laws and general statutory provisions in force in the area, or allow them to modify or affect any personal or restrictive covenants,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

### **8. Works Affecting the Public Highway**

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

### **9. The Dulwich Estate Scheme of Management**

- Development of sites within the area covered by the Scheme of Management may also require the permission of the Dulwich Estate. If your property is in the Dulwich area with a post code of SE19, 21, 22, 24 or 26 you are advised

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to consult the Estates Governors', The Old College, Gallery Road SE21 7AE  
[tel: 020-8299-1000].

**10. Building Regulations.**

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

**11. The Party Wall Etc. Act 1996.**

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

**12. Important**

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

## Appendix 2: Planning Policies

### Adopted planning policy

#### National Planning Policy Framework (NPPF)

1. The revised National Planning Policy Framework ('NPPF'), updated in 2021, sets out the national planning policy and how this should be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental. At its heart is a presumption in favour of sustainable development.
2. Paragraph 215 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.
3. The relevant chapters of the NPPF are:
  - Chapter 2 - Achieving sustainable development
  - Chapter 6 - Building a strong, competitive economy
  - Chapter 7 - Ensuring the vitality of town centres
  - Chapter 8 - Promoting healthy and safe communities
  - Chapter 9 - Promoting sustainable transport
  - Chapter 11 - Making effective use of land
  - Chapter 12 - Achieving well-designed places
  - Chapter 14 - Meeting the challenge of climate change, flooding and coastal change
  - Chapter 15 - Conserving and enhancing the natural environment
  - Chapter 16 - Conserving and enhancing the historic environment

#### London Plan 2021

4. 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.
5. The strategic objectives of the London Plan 2021 are to build strong and inclusive communities, make the best use of land, promote a healthy city, optimise housing delivery including affordable housing, conserve and enhance London's global competitiveness, and move towards a more resilient and sustainable city. Development proposals must comply with the various policies within the Plan and should follow the guidance set out within Supplementary Planning Documents, Guidance and Strategies.
6. The relevant policies of the London Plan 2021 are:
  - GG1 - Building strong and inclusive communities
  - GG2 - Making the best use of land
  - GG3 - Creating a healthy city
  - GG5 - Growing a good economy

- GG6 - Increasing efficiency and resilience
- Policy SD1 - Opportunity Areas
- Policy SD4 - The Central Activities Zone
- Policy SD5 - Offices, other strategic functions and residential development in the CAZ
- Policy SD6 - Town centres and high streets
- Policy SD7 - Town centres: development principles and development plan documents
- Policy SD10 - Strategic and local regeneration
- Policy D1 - London's form, character and capacity for growth
- Policy D2 - Infrastructure requirements for sustainable densities
- Policy D3 - Optimising site capacity through design-led approach
- Policy D4 - Delivering good design
- Policy D5 - Inclusive design
- Policy D8 - Public realm
- Policy D9 - Tall Buildings
- Policy D10 - Basement development
- Policy D11 - Safety, security and resilience to emergency
- Policy D12 - Fire safety
- Policy D13 - Agent of change
- Policy D14 - Noise
- Policy E1 - Offices
- Policy E2 - Providing suitable business space
- Policy E3 - Affordable workspace
- Policy E9 - Retail, markets and hot food takeaways
- Policy E10 - Visitor infrastructure
- Policy E11 - Skills and opportunities for all
- Policy HC1 - Heritage conservation and growth
- Policy HC3 - Strategic and local views
- Policy G1 - Green infrastructure
- Policy G4 - Open space
- Policy G5 - Urban greening
- Policy G6 - Biodiversity and access to nature
- Policy G7 - Trees and woodlands
- Policy SI 1 - Improving air quality
- Policy SI 2 - Minimising greenhouse gas emissions
- Policy SI 3 - Energy infrastructure
- Policy SI 4 - Managing heat risk
- Policy SI 5 - Water infrastructure
- Policy SI 6 - Digital connectivity infrastructure
- Policy SI 7 - Reducing waste and supporting the circular economy
- Policy SI 8 - Waste capacity and net waste self-sufficiency
- Policy SI 12 - Flood risk management
- Policy SI 13 - Sustainable drainage
- Policy T1 - Strategic approach to transport
- Policy T2 - Healthy Streets
- Policy T3 - Transport capacity, connectivity and safeguarding

- Policy T4 - Assessing and mitigating transport impacts
- Policy T5 - Cycling
- Policy T6 - Car parking
- Policy T6.2 - Office parking
- Policy T6.3 - Retail parking
- Policy T6.4 - Hotel and leisure uses parking
- Policy T6.5 - Non-residential disabled persons parking
- Policy T7 - Deliveries, servicing and construction
- Policy T9 - Funding transport infrastructure through planning

### Relevant London-level Supplementary Planning Documents/ Guidance and Strategies

7. The relevant London-level supplementary planning documents and guidance documents are as follows:

- Mayor of London: Accessible London - Achieving an Inclusive Environment (SPG, 2004)
- Mayor of London: Climate Change Mitigation and Energy Strategy (2010)
- Mayor of London: Climate Change Adaptation Strategy (2011)
- Mayor of London: Crossrail Funding (SPG, 2016)
- Mayor of London: Environment Strategy (2018)
- Mayor of London: Planning for Equality and Diversity in London (SPG, 2007)
- Mayor of London: Shaping Neighbourhoods - Character and Context (SPG, 2014)
- Mayor of London: The Control of Dust and Emissions During Construction and Demolition (SPG, 2014)
- Mayor of London: Transport Strategy (2018)

### Draft GLA guidance (emerging material considerations)

8. To support the London Plan 2021, the GLA has drafted further London Planning Guidance (LPG) on topic areas including:

- Mayor of London: Air Quality Neutral (draft)
- Mayor of London: Fire Safety (draft)
- Mayor of London: Optimising site capacity: a design-led approach (draft)
- Mayor of London: Sustainable transport, walking and cycling (draft)
- Mayor of London: Urban Greening Factor (draft)

### Southwark Plan

9. The Southwark Plan 2022 includes Strategic Policies, Area Visions and Development Management Policies. The most relevant strategic policies are as follows:



- ST1 - Southwark's Development Targets
- ST2 - Southwark's Places
- SP2 - Southwark Together
- SP3 - A great start in life
- SP4 - Green and inclusive economy
- SP5 - Thriving and neighbourhoods and tackling health equalities
- SP6 - Climate emergency
- AV.09 - Elephant and Castle Area Vision
- 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 P21 - Conservation of the historic environment and natural heritage
- Policy P22 - Borough Views
- Policy P23 - Archaeology
- Policy P26 - Local List
- Policy P28 - Access to employment and training
- Policy P30 - Office and business development
- Policy P31 - Affordable workspace
- Policy P32 - Small shops
- Policy P33 - Business relocation
- Policy P35 - Town and local centres
- Policy P39 - Shop fronts
- Policy P41 - Hotels and other visitor accommodation
- Policy P43 - Outdoor advertisements and signage
- Policy P44 - Broadband and digital infrastructure
- Policy P47 - Community uses
- Policy P48 - Hot food takeaways
- Policy P49 - Public transport
- Policy P50 - Highway impacts
- Policy P51 - Walking
- Policy P53 - Cycling
- Policy P54 - Car parking
- 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 P64 - Contaminated land and hazardous substances
- 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

### Relevant Local-level Supplementary Planning Documents

10. The relevant supplementary planning documents and guidance documents from the local development plan are as follows:

- 2015 Technical Update to the Residential Design Standards 2011 (SPD, 2015)
- Design and Access Statements (SPD, 2007)
- Section 106 Planning Obligations and Community Infrastructure Levy (SPD, 2015 with 2017 Addendum)
- Sustainability Assessment (SPD, 2009)
- Sustainable Design and Construction (SPD, 2009)
- Sustainable Transport (SPD, 2010)

### Relevant Conservation Area Appraisals

11. The following two Conservation Area Appraisals are relevant to the site:

- Elliott's Row
- West Square

**Appendix 3: Relevant planning history**

1. Reference Number: 20/EQ/0207  
Application Type: Pre-application enquiry

*Follow-up pre-application enquiry for: the construction of a 15-storey building (plus rooftop plant) with a further two storeys of accommodation at basement level, comprising office (Class B1) floorspace of 778 square metres GIA, a hotel (Class C1) of 3199 square metres GIA and containing 89 rooms and a retail (Class A1) unit of 122 square metres, requiring the demolition of the existing commercial (part Class B1, part Class A2) building. 20/EQ/0207 is a follow-up to pre-application enquiries 19/EQ/0394, 20/EQ/0022 and 20/EQ/0106.*

Decision: Pre-application enquiry closed  
Decision date: 21.10.2020

2. Reference Number: 20/AP/0342  
Application Type: Certificate of Lawfulness

*Certificate of lawfulness (existing) for Class A2 use (financial and professional services) at basement and ground floor levels*

Decision: Granted  
Decision date: 11.03.2020

## Appendix 4: Consultation undertaken

**Site notice date:** 10/09/2021

**Press notice date:** 01/12/2022

**Case officer site visit date:** 10/09/2021.

**Neighbour consultation letters sent:** 03/05/2022

### Internal services consulted:

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

### Statutory and non-statutory organisations consulted:

Transport for London  
 Environment Agency  
 Great London Authority  
 Historic England  
 London Fire & Emergency Planning Authority  
 London Underground  
 Natural England - London & South East Region  
 Network Rail  
 Metropolitan Police Service (Designing Out Crime)  
 Transport for London  
 Thames Water

### Neighbour and local groups consulted:

- 39, West Square London SE114SP
- Arments Court London Se5 0df
- 75 Perronet House Princess Street London
- Flat 14 71/89 Brook Drive SE11 4TR
- Flat 48 Perronet House Gaywood Estate Princess Street
- Flat A 19 Princess Street London
- Flat 39 Prospect House Gaywood Estate Gaywood Street
- 4 Hayles Street London Southwark
- 20 Hayles Buildings Elliotts Row London
- 15 Hayles Buildings Elliotts Row London
- 11 Hayles Buildings Elliotts Row London
- 79 St Georges Road London

- Southwark
- Flat 22 Prospect House Gaywood Estate Gaywood Street
- Flat 41 Perronet House Gaywood Estate Princess Street
- Flat 33 Perronet House Gaywood Estate Princess Street
- Flat 19 Perronet House Gaywood Estate Princess Street
- 23 Hayles Street London Southwark
- 71 Hayles Buildings Elliotts Row London
- Flat 2 44 London Road London
- Flat 55 Newman House Gaywood Estate St Georges Road
- 1A Hayles Street London Southwark
- 23 St Georges Buildings St Georges Road London
- 7B Hayles Street London Southwark
- Flat 1 43 Oswin Street London
- Flat 5 Wardroper House 62 St Georges Road
- Ground Floor Flat 25 Oswin Street London
- First Floor And Second Floor Flat 9 Hayles Street London
- 22B Hayles Street London Southwark
- 74 Hayles Buildings Elliotts Row London
- 21 Hayles Street London Southwark
- 2 Hayles Street London Southwark
- Flat 23 Newman House Gaywood Estate St Georges Road
- 10 Hayles Street London Southwark
- 81 St Georges Road London Southwark
- 69 St Georges Road London Southwark
- Flat B 58 St Georges Road London
- 19 Metropolis Oswin Street London
- 7 Metropolis Oswin Street London
- 67 Hayles Buildings Elliotts Row London
- 66 Hayles Buildings Elliotts Row London
- 61 Hayles Buildings Elliotts Row London
- 68 Elliotts Row London Southwark
- 61 Elliotts Row London Southwark
- 59 Elliotts Row London Southwark
- 3 Hayles Buildings Elliotts Row London
- 19 Hayles Buildings Elliotts Row London
- Flat 6 44 London Road London
- 40 London Road London Southwark
- Flat 53 Prospect House Gaywood Estate Gaywood Street
- Flat 47 Prospect House Gaywood Estate Gaywood Street
- Flat 34 Prospect House Gaywood Estate Gaywood Street
- Flat 3 Prospect House Gaywood Estate Gaywood Street
- Flat 21 Prospect House Gaywood Estate Gaywood Street
- Flat 12 Laurie House Gaywood Estate Gaywood Street
- Flat A 9 Princess Street London
- Flat A 7 Princess Street London
- Flat A 15 Princess Street London
- Flat A 11 Princess Street London
- Flat A 22 Gaywood Street London
- 26 Princess Street London Southwark
- 22 Princess Street London Southwark
- Flat 76 Perronet House Gaywood Estate Princess Street
- Flat 58 Perronet House Gaywood Estate Princess Street
- Flat 37 Perronet House Gaywood Estate Princess Street
- Flat 32 Perronet House Gaywood Estate Princess Street
- Flat 23 Perronet House Gaywood Estate Princess Street
- Flat 2 Perronet House Gaywood Estate Princess Street
- 1 Lily Mews London Southwark
- Flat 1 21 Oswin Street London
- Flat 2 15 Hayles Street London
- Flat 1 15 Hayles Street London
- Unit 10 Elephant Arcade 50 London Road
- Flat 8 Laurie House Gaywood Estate Gaywood Street
- New Medical Systems Limited 21 St Georges Road London
- Flat 11 Laurie House Gaywood

- Estate Gaywood Street
- Flat 7 44 London Road London
- 62 Elliotts Row London Southwark
- 5 Hayles Street London Southwark
- 46 Hayles Street London Southwark
- Flat 89 Perronet House Gaywood Estate Princess Street
- 34 St Georges Buildings St Georges Road London
- Flat C Top Floor 19 Oswin Street London
- 41 Hayles Street London Southwark
- Flat A 58 St Georges Road London
- Flat 10 Laurie House Gaywood Estate Gaywood Street
- Flat 79 Perronet House Gaywood Estate Princess Street
- Flat 69 Perronet House Gaywood Estate Princess Street
- Flat A 8 Gaywood Street London
- Flat 54 Prospect House Gaywood Estate Gaywood Street
- Flat 46 Prospect House Gaywood Estate Gaywood Street
- 3 St Georges Buildings St Georges Road London
- 1 St Georges Buildings St Georges Road London
- 4 Hayles Buildings Elliotts Row London
- Top Floor Flat 25 Oswin Street London
- Flat 59 Perronet House Gaywood Estate Princess Street
- Flat B 8 Gaywood Street London
- Flat 17 Prospect House Gaywood Estate Gaywood Street
- 69 Hayles Buildings Elliotts Row London
- 16 St Georges Buildings St Georges Road London
- 25 Hayles Street London Southwark
- 8 St Georges Buildings St Georges Road London
- Flat 3 Wardroper House 62 St Georges Road
- Flat 9 Laurie House Gaywood Estate Gaywood Street
- Flat 3 43 Oswin Street London
- Flat 53 Newman House Gaywood Estate St Georges Road
- Flat 24 Perronet House Gaywood Estate Princess Street
- 41 Hayles Buildings Elliotts Row London
- Flat 83 Perronet House Gaywood Estate Princess Street
- Flat 62 Newman House Gaywood Estate St Georges Road
- Flat 6 5 Oswin Street London
- Flat 43 Prospect House Gaywood Estate Gaywood Street
- Flat 2 54 Elliotts Row London
- Flat 6 43 Oswin Street London
- Flat 18 Prospect House Gaywood Estate Gaywood Street
- 18 Hayles Buildings Elliotts Row London
- 51 Hayles Buildings Elliotts Row London
- 53 Hayles Street London Southwark
- 53 Elliotts Row London Southwark
- Flat 4 Laurie House Gaywood Estate Gaywood Street
- Flat 2 Laurie House Gaywood Estate Gaywood Street
- Flat 67 Perronet House Gaywood Estate Princess Street
- Flat 62 Perronet House Gaywood Estate Princess Street
- Flat 53 Perronet House Gaywood Estate Princess Street
- Flat B 22 Gaywood Street London
- 7 Hayles Buildings Elliotts Row London
- Flat 29 Prospect House Gaywood Estate Gaywood Street
- Flat 26 Prospect House Gaywood Estate Gaywood Street
- Flat 29 Perronet House Gaywood Estate Princess Street
- Flat 17 Perronet House Gaywood Estate Princess Street
- Flat 8 Prospect House Gaywood Estate Gaywood Street
- 65 Hayles Buildings Elliotts Row London
- 14 St Georges Buildings St Georges Road London
- Flat 58 Newman House Gaywood Estate St Georges Road
- Flat A 23 Oswin Street London

- Flat B First Floor 19 Oswin Street London
- Basement And Part Ground Floor 21 St Georges Road London
- Flat B 37 Oswin Street London
- 78 Hayles Buildings Elliotts Row London
- 33 St Georges Buildings St Georges Road London
- Flat 56 Newman House Gaywood Estate St Georges Road
- Flat 54 Newman House Gaywood Estate St Georges Road
- Flat 43 Perronet House Gaywood Estate Princess Street
- 68 Hayles Buildings Elliotts Row London
- Ground Floor Flat 9 Hayles Street London
- Flat 1 17 Oswin Street London
- Flat 26 Newman House Gaywood Estate St Georges Road
- Flat 3 49 Elliotts Row London
- Kiosk Outside 21 St Georges Road London
- Flat 15 Wardroper House 62 St Georges Road
- Flat 13 Wardroper House 62 St Georges Road
- Flat 10 Wardroper House 62 St Georges Road
- Flat 3 15 Hayles Street London
- Flat 7 5 Oswin Street London
- First Floor And Second Floor Flat 63 Elliotts Row London
- Flat 4 65-66 Elliotts Row London
- 24 St Georges Buildings St Georges Road London
- 21 St Georges Buildings St Georges Road London
- Flat 61 Newman House Gaywood Estate St Georges Road
- Flat 57 Newman House Gaywood Estate St Georges Road
- 61 Hayles Street London Southwark
- 45 Hayles Street London Southwark
- 31 Hayles Street London Southwark
- 30 Hayles Street London Southwark
- 28 St Georges Buildings St Georges Road London
- 83 St Georges Road London Southwark
- 6 Metropolis Oswin Street London
- Flat 33 St Georges Road London
- 58 Hayles Buildings Elliotts Row London
- 48 Hayles Buildings Elliotts Row London
- 39 Oswin Street London Southwark
- 45 Elliotts Row London Southwark
- 23 Hayles Buildings Elliotts Row London
- Flat 45 Prospect House Gaywood Estate Gaywood Street
- Flat 33 Prospect House Gaywood Estate Gaywood Street
- 17 Gaywood Street London Southwark
- Flat 12 Perronet House Gaywood Estate Princess Street
- Flat A 14 Gaywood Street London
- Flat 70 Perronet House Gaywood Estate Princess Street
- Flat 52 Perronet House Gaywood Estate Princess Street
- Flat 28 Perronet House Gaywood Estate Princess Street
- Flat 18 Perronet House Gaywood Estate Princess Street
- Flat E 23 Oswin Street London
- Flat C 23 Oswin Street London
- Unit 11B Elephant Arcade 50 London Road
- Unit 11 Elephant Arcade 50 London Road
- 4 Copperbox Apartments 35 St Georges Road London
- Flat 11 Wardroper House 62 St Georges Road
- 57 Hayles Street London Southwark
- 51 Hayles Street London Southwark
- 39 Hayles Street London Southwark
- Flat 87 Perronet House Gaywood Estate Princess Street
- 7 St Georges Buildings St Georges Road London
- 71 St Georges Road London Southwark
- 53 Hayles Buildings Elliotts Row London

- 37 Hayles Buildings Elliotts Row London
- 13 Oswin Street London Southwark
- 47 Elliotts Row London Southwark
- 44 Elliotts Row London Southwark
- 43 Elliotts Row London Southwark
- 33 Hayles Buildings Elliotts Row London
- 8 Hayles Buildings Elliotts Row London
- 42 London Road London Southwark
- Flat 49 Prospect House Gaywood Estate Gaywood Street
- Flat 31 Prospect House Gaywood Estate Gaywood Street
- Flat 1 Perronet House Gaywood Estate Princess Street
- Flat B 19 Princess Street London
- Flat A 17 Princess Street London
- Flat 61 Prospect House Gaywood Estate Gaywood Street
- 36 Princess Street London Southwark
- 35 Gaywood Street London Southwark
- Flat 82 Perronet House Gaywood Estate Princess Street
- Flat 47 Perronet House Gaywood Estate Princess Street
- Flat 39 Perronet House Gaywood Estate Princess Street
- Flat 3 Perronet House Gaywood Estate Princess Street
- Flat 2 11 Oswin Street London
- 55C St Georges Road London Southwark
- 10A Gaywood Street London Southwark
- 1 Copperbox Apartments 35 St Georges Road London
- Flat 1 50 Elliotts Row London
- Flat 1 54 Elliotts Row London
- Flat A Ground Floor 19 Oswin Street London
- Flat B 13 Hayles Street London
- Flat 7 43 Oswin Street London
- Unit 6 Elephant Arcade 50 London Road
- Unit 1 Elephant Arcade 50 London Road
- Ground Floor And Lower Ground Floor 21 St Georges Road London
- Lamdash Community Gardens Lamdash Street London
- Flat 16 Perronet House Gaywood Estate Princess Street
- Flat 21 Perronet House Gaywood Estate Princess Street
- Flat 36 Prospect House Gaywood Estate Gaywood Street
- 6 Hayles Buildings Elliotts Row London
- 48 Elliotts Row London Southwark
- 75 Hayles Buildings Elliotts Row London
- 63 St Georges Road London Southwark
- Flat 46 Perronet House Gaywood Estate Princess Street
- Flat 24 Newman House Gaywood Estate St Georges Road
- 21 Hayles Buildings Elliotts Row London
- 43 Oswin Street London Southwark
- 15 Oswin Street London Southwark
- 31 Gaywood Street London Southwark
- Metropolitan Tabernacle Church Elephant And Castle London
- Flat 11 Perronet House Gaywood Estate Princess Street
- Flat 9 Perronet House Gaywood Estate Princess Street
- 59 Hayles Buildings Elliotts Row London
- Flat 2 17 Oswin Street London
- Flat 60 Newman House Gaywood Estate St Georges Road
- Flat 57 Prospect House Gaywood Estate Gaywood Street
- Flat 38 Prospect House Gaywood Estate Gaywood Street
- 79 Hayles Buildings Elliotts Row London
- Flat B 16 Gaywood Street London
- 54 Hayles Buildings Elliotts Row London
- 43 Hayles Buildings Elliotts Row London
- 38 Hayles Buildings Elliotts Row London



- Flat 2 65-66 Elliotts Row London
- 38 Hayles Street London Southwark
- 60 Elliotts Row London Southwark
- 39 Elliotts Row London Southwark
- Flat D 58 St Georges Road London
- Flat B 17 Princess Street London
- Flat 48 Prospect House Gaywood Estate Gaywood Street
- Flat 37 Prospect House Gaywood Estate Gaywood Street
- 26 Hayles Street London Southwark
- 14 Hayles Street London Southwark
- 22 St Georges Buildings St Georges Road London
- 7A Hayles Street London Southwark
- 73 St Georges Road London Southwark
- Flat 13 Prospect House Gaywood Estate Gaywood Street
- Flat 8 Perronet House Gaywood Estate Princess Street
- 15 Metropolis Oswin Street London
- 11 Metropolis Oswin Street London
- Unit 5 Perronet House Gaywood Estate Princess Street
- Middle Floor Flat 25 Oswin Street London
- 2 Copperbox Apartments 35 St Georges Road London
- Flat 28 Newman House Gaywood Estate St Georges Road
- Flat 8 Wardroper House 62 St Georges Road
- Flat D 37 Oswin Street London
- 30 St Georges Buildings St Georges Road London
- 33 Oswin Street London Southwark
- Flat 59 Newman House Gaywood Estate St Georges Road
- 32 Hayles Street London Southwark
- Flat 20 Newman House Gaywood Estate St Georges Road
- 6 St Georges Buildings St Georges Road London
- 12 St Georges Buildings St Georges Road London
- 77 St Georges Road London Southwark
- Flat C 60 St Georges Road London
- 1 Metropolis Oswin Street London
- 1 Hayles Buildings Elliotts Row London
- Flat 19 Newman House Gaywood Estate St Georges Road
- 24 Princess Street London Southwark
- Flat A 12 Gaywood Street London
- 49 Hayles Buildings Elliotts Row London
- 27 Hayles Buildings Elliotts Row London
- Flat 74 Perronet House Gaywood Estate Princess Street
- Flat 62 Prospect House Gaywood Estate Gaywood Street
- Flat 59 Prospect House Gaywood Estate Gaywood Street
- 11 St Georges Buildings St Georges Road London
- Flat 3 21 Oswin Street London
- Flat 24 Prospect House Gaywood Estate Gaywood Street
- Flat 11 Prospect House Gaywood Estate Gaywood Street
- Flat 5 Perronet House Gaywood Estate Princess Street
- Flat 35 Perronet House Gaywood Estate Princess Street
- Basement And Ground Floor Flat 25 Gaywood Street London
- 29 St Georges Buildings St Georges Road London
- 26 St Georges Buildings St Georges Road London
- Flat 9 43 Oswin Street London
- First Floor Flat Southwark Citadel 1 Princess Street
- Ground Floor Flat 7 Oswin Street London
- 20 Metropolis Oswin Street London
- 35 Oswin Street London Southwark
- 82 Hayles Buildings Elliotts Row London
- 25 St Georges Buildings St Georges Road London
- 19 St Georges Buildings St Georges Road London
- 13 St Georges Buildings St Georges Road London
- 50 Hayles Street London Southwark
- 44 Hayles Street London Southwark

- 43 Hayles Street London Southwark
- 16 Hayles Street London Southwark
- 14 Metropolis Oswin Street London
- 4 Metropolis Oswin Street London
- 3 Metropolis Oswin Street London
- 63 Hayles Buildings Elliotts Row London
- 45 Hayles Buildings Elliotts Row London
- 9 Oswin Street London Southwark
- 29 Oswin Street London Southwark
- 55 Elliotts Row London Southwark
- 37 Elliotts Row London Southwark
- 36 Hayles Buildings Elliotts Row London
- 31 Hayles Buildings Elliotts Row London
- 30 Hayles Buildings Elliotts Row London
- 2 Hayles Buildings Elliotts Row London
- 14 Hayles Buildings Elliotts Row London
- Flat 1 44 London Road London
- 23 Gaywood Street London Southwark
- 21 Gaywood Street London Southwark
- Flat 25 Prospect House Gaywood Estate Gaywood Street
- Flat 23 Prospect House Gaywood Estate Gaywood Street
- 39 Hayles Buildings Elliotts Row London
- 7 Oswin Street London Southwark
- 41 Elliotts Row London Southwark
- 22 Hayles Buildings Elliotts Row London
- 5 Hayles Buildings Elliotts Row London
- Flat 3 44 London Road London
- 38 London Road London Southwark
- Flat 50 Prospect House Gaywood Estate Gaywood Street
- Flat 42 Prospect House Gaywood Estate Gaywood Street
- 24 Gaywood Street London Southwark
- Flat 27 Prospect House Gaywood Estate Gaywood Street
- Flat 15 Prospect House Gaywood Estate Gaywood Street
- 2 Princess Street London Southwark
- Flat 17 Laurie House Gaywood Estate Gaywood Street
- 34 Princess Street London Southwark
- 20 Princess Street London Southwark
- 27 Gaywood Street London Southwark
- Flat 80 Perronet House Gaywood Estate Princess Street
- Flat 61 Perronet House Gaywood Estate Princess Street
- Flat 42 Perronet House Gaywood Estate Princess Street
- Flat 30 Perronet House Gaywood Estate Princess Street
- 7 Copperbox Apartments 35 St Georges Road London
- Flat 9 Wardroper House 62 St Georges Road
- London College Of Printing And Graphic Art Elephant And Castle London
- Unit 5 Elephant Arcade 50 London Road
- Unit 8 Elephant Arcade 50 London Road
- 54 Hayles Street London Southwark
- 66 Hayles Street London Southwark
- 35B Elliotts Row London Southwark
- 32C Elliotts Row London Southwark
- 62 Hayles Street London Southwark
- 58 Hayles Street London Southwark
- 32A Elliotts Row London Southwark
- 52 Hayles Street London Southwark
- 68 Hayles Street London Southwark
- 56 Hayles Street London Southwark
- 33 Elliotts Row London Southwark
- 31 Elliotts Row London Southwark
- 35A Elliotts Row London Southwark
- 34 Elliotts Row London Southwark
- 64 Hayles Street London Southwark
- 60 Hayles Street London Southwark
- 32B Elliotts Row London Southwark
- 36 Elliotts Row London Southwark
- Flat 9 Prospect House Gaywood Estate Gaywood Street

- Flat 58 Prospect House Gaywood Estate Gaywood Street
- Flat 75 Perronet House Gaywood Estate Princess Street
- Flat 73 Perronet House Gaywood Estate Princess Street
- Flat 63 Perronet House Gaywood Estate Princess Street
- Flat 54 Perronet House Gaywood Estate Princess Street
- Flat 45 Perronet House Gaywood Estate Princess Street
- Flat 7 Perronet House Gaywood Estate Princess Street
- 2 Lily Mews London Southwark
- 6 Copperbox Apartments 35 St Georges Road London
- Flat 78 Perronet House Gaywood Estate Princess Street
- 34 Hayles Buildings Elliotts Row London
- 28 Princess Street London Southwark
- Flat 29 Newman House Gaywood Estate St Georges Road
- Prince Of Wales 51 St Georges Road London
- 20 St Georges Buildings St Georges Road London
- Flat B 7 Princess Street London
- 24 Hayles Buildings Elliotts Row London
- 15 St Georges Buildings St Georges Road London
- 37 Hayles Street London Southwark
- 13 Hayles Buildings Elliotts Row London
- Flat 3 11 Oswin Street London
- Flat 5 5 Oswin Street London
- Flat 57 Perronet House Gaywood Estate Princess Street
- 46 Hayles Buildings Elliotts Row London
- 40 Hayles Buildings Elliotts Row London
- 29 Hayles Buildings Elliotts Row London
- 17 Hayles Street London Southwark
- Flat 13 Laurie House Gaywood Estate Gaywood Street
- Flat 64 Perronet House Gaywood Estate Princess Street
- Flat 60 Prospect House Gaywood Estate Gaywood Street
- Flat 52 Prospect House Gaywood Estate Gaywood Street
- Flat 5 Prospect House Gaywood Estate Gaywood Street
- Flat 35 Prospect House Gaywood Estate Gaywood Street
- Flat 32 Prospect House Gaywood Estate Gaywood Street
- Flat 4 Perronet House Gaywood Estate Princess Street
- Flat 31 Perronet House Gaywood Estate Princess Street
- 18 Metropolis Oswin Street London
- 8 Metropolis Oswin Street London
- Flat 21 Newman House Gaywood Estate St Georges Road
- Flat 5 44 London Road London
- Flat 56 Prospect House Gaywood Estate Gaywood Street
- Flat 8 44 London Road London
- Flat 88 Perronet House Gaywood Estate Princess Street
- 46 St Georges Road London Southwark
- Flat D 23 Oswin Street London
- The Flat Metropolitan Tabernacle Elephant And Castle
- 34 Hayles Street London Southwark
- Flat 2 50 Elliotts Row London
- First Floor 21 St Georges Road London
- 27 Oswin Street London Southwark
- Flat 2 5 Oswin Street London
- Flat A 37 Oswin Street London
- First Floor And Second Floor Flat 25 Gaywood Street London
- Flat 3 5 Oswin Street London
- Flat 3 65-66 Elliotts Row London
- 77 Hayles Buildings Elliotts Row London
- 31 St Georges Buildings St Georges Road London
- 55 Hayles Street London Southwark
- 33 Hayles Street London Southwark
- 29 Hayles Street London Southwark
- 19 Hayles Street London Southwark
- 11 Hayles Street London Southwark

- Flat 25 Newman House Gaywood Estate St Georges Road
- Flat 86 Perronet House Gaywood Estate Princess Street
- Flat 84 Perronet House Gaywood Estate Princess Street
- 2 St Georges Buildings St Georges Road London
- 75 St Georges Road London Southwark
- 59 St Georges Road London Southwark
- 17 Metropolis Oswin Street London
- 55 Hayles Buildings Elliotts Row London
- 42 Hayles Buildings Elliotts Row London
- 51 Elliotts Row London Southwark
- 40 Elliotts Row London Southwark
- 39 London Road London Southwark
- Flat 51 Prospect House Gaywood Estate Gaywood Street
- 15 Gaywood Street London Southwark
- Flat 1 Laurie House Gaywood Estate Gaywood Street
- Flat B 13 Princess Street London
- Flat A 13 Princess Street London
- Flat B 14 Gaywood Street London
- Flat A 16 Gaywood Street London
- Flat 7 Prospect House Gaywood Estate Gaywood Street
- Flat 6 Prospect House Gaywood Estate Gaywood Street
- 42 Princess Street London Southwark
- 30 Princess Street London Southwark
- 29 Gaywood Street London Southwark
- Flat 72 Perronet House Gaywood Estate Princess Street
- Flat 66 Perronet House Gaywood Estate Princess Street
- Flat 51 Perronet House Gaywood Estate Princess Street
- Flat 49 Perronet House Gaywood Estate Princess Street
- Flat 44 Perronet House Gaywood Estate Princess Street
- Flat 26 Perronet House Gaywood Estate Princess Street
- 48 St Georges Road London Southwark
- Flat 2 21 Oswin Street London
- Flat 12 Wardroper House 62 St Georges Road
- Flat 7 Wardroper House 62 St Georges Road
- Flat B 23 Oswin Street London
- Flat 4 43 Oswin Street London
- Unit 3 Elephant Arcade 50 London Road
- Unit 7 Elephant Arcade 50 London Road
- Unit 2 Elephant Arcade 50 London Road
- Flat 3 Laurie House Gaywood Estate Gaywood Street
- Flat 63 Prospect House Gaywood Estate Gaywood Street
- 9 Metropolis Oswin Street London
- 48 Hayles Street London Southwark
- 38 Elliotts Row London Southwark
- 40 Hayles Street London Southwark
- 8 Hayles Street London Southwark
- Flat 3 17 Oswin Street London
- Flat 77 Perronet House Gaywood Estate Princess Street
- Flat 4 44 London Road London
- 57 Hayles Buildings Elliotts Row London
- Flat 14 Prospect House Gaywood Estate Gaywood Street
- Flat 22 Perronet House Gaywood Estate Princess Street
- 38 Princess Street London Southwark
- 32 Princess Street London Southwark
- 35 Hayles Buildings Elliotts Row London
- 59 Hayles Street London Southwark
- 49 Hayles Street London Southwark
- Flat 71 Perronet House Gaywood Estate Princess Street
- Flat 60 Perronet House Gaywood Estate Princess Street
- Flat 2 Prospect House Gaywood Estate Gaywood Street
- Flat 16 Prospect House Gaywood Estate Gaywood Street

- Estate Gaywood Street
- 84 Hayles Buildings Elliotts Row London
- 81 Hayles Buildings Elliotts Row London
- Flat 27 Perronet House Gaywood Estate Princess Street
- Flat 25 Perronet House Gaywood Estate Princess Street
- Flat 20 Perronet House Gaywood Estate Princess Street
- Flat 15 Perronet House Gaywood Estate Princess Street
- 2 Metropolis Oswin Street London
- Flat C 37 Oswin Street London
- Flat 10 43 Oswin Street London
- 5 Copperbox Apartments 35 St Georges Road London
- Flat 51 Newman House Gaywood Estate St Georges Road
- 32 St Georges Buildings St Georges Road London
- Flat 90 Perronet House Gaywood Estate Princess Street
- Flat 85 Perronet House Gaywood Estate Princess Street
- 9 St Georges Buildings St Georges Road London
- Flat A 13 Hayles Street London
- 80 Hayles Buildings Elliotts Row London
- 47 Hayles Street London Southwark
- 27 Hayles Street London Southwark
- 6 Hayles Street London Southwark
- 18 Hayles Street London Southwark
- Flat 27 Newman House Gaywood Estate St Georges Road
- 65 St Georges Road London Southwark
- Flat D 60 St Georges Road London
- Flat C 58 St Georges Road London
- Flat A 60 St Georges Road London
- 70 Hayles Buildings Elliotts Row London
- 64 Hayles Buildings Elliotts Row London
- 50 Hayles Buildings Elliotts Row London
- 44 Hayles Buildings Elliotts Row London
- 58 Elliotts Row London Southwark
- 52 Elliotts Row London Southwark
- 25 Hayles Buildings Elliotts Row London
- 17 Hayles Buildings Elliotts Row London
- Flat 40 Prospect House Gaywood Estate Gaywood Street
- Flat 4 Prospect House Gaywood Estate Gaywood Street
- Flat 28 Prospect House Gaywood Estate Gaywood Street
- 11 Gaywood Street London Southwark
- Flat 19 Prospect House Gaywood Estate Gaywood Street
- Flat 12 Prospect House Gaywood Estate Gaywood Street
- Flat 14 Perronet House Gaywood Estate Princess Street
- Flat 7 Laurie House Gaywood Estate Gaywood Street
- Flat 5 Laurie House Gaywood Estate Gaywood Street
- Flat 16 Laurie House Gaywood Estate Gaywood Street
- Flat B 20 Gaywood Street London
- Flat B 12 Gaywood Street London
- Flat 68 Perronet House Gaywood Estate Princess Street
- Flat 56 Perronet House Gaywood Estate Princess Street
- Flat 36 Perronet House Gaywood Estate Princess Street
- Flat 1 11 Oswin Street London
- Flat 1 49 Elliotts Row London
- 3 Copperbox Apartments 35 St Georges Road London
- Flat 1 Wardroper House 62 St Georges Road
- Flat 2 43 Oswin Street London
- Unit 9 Elephant Arcade 50 London Road
- Unit 4 Elephant Arcade 50 London Road
- Flat 14 Laurie House Gaywood Estate Gaywood Street
- Second Floor 21 St Georges Road London
- 55B St Georges Road London Southwark

- 12 Hayles Street London Southwark
- 41 London Road London Southwark
- 73 Hayles Buildings Elliotts Row London
- 30 Elliotts Row London Southwark
- Flat 22 Newman House Gaywood Estate St Georges Road
- Flat 65 Perronet House Gaywood Estate Princess Street
- 9 Hayles Buildings Elliotts Row London
- Flat 5 43 Oswin Street London
- Flat 4 5 Oswin Street London
- 12 Metropolis Oswin Street London
- 56 Elliotts Row London Southwark
- Flat 6 Laurie House Gaywood Estate Gaywood Street
- 5 St Georges Buildings St Georges Road London
- 55-57 St Georges Road London Southwark
- 19 Gaywood Street London Southwark
- Flat A 18 Gaywood Street London
- 42 Elliotts Row London Southwark
- Flat 15 Laurie House Gaywood Estate Gaywood Street
- Flat 50 Perronet House Gaywood Estate Princess Street
- Flat B 11 Princess Street London
- 1 Hayles Street London Southwark
- 20 Hayles Street London Southwark
- 67 St Georges Road London Southwark
- Flat 30 Prospect House Gaywood Estate Gaywood Street
- Flat 13 Perronet House Gaywood Estate Princess Street
- 76 Hayles Buildings Elliotts Row London
- 62 Hayles Buildings Elliotts Row London
- 5 Metropolis Oswin Street London
- 8 Copperbox Apartments 35 St Georges Road London
- 17 St Georges Buildings St Georges Road London
- 10B Gaywood Street London Southwark
- Flat 1 3-5 Oswin Street London
- 22A Hayles Street London Southwark
- Flat 1 65-66 Elliotts Row London
- 83 Hayles Buildings Elliotts Row London
- 72 Hayles Buildings Elliotts Row London
- 27 St Georges Buildings St Georges Road London
- 18 St Georges Buildings St Georges Road London
- Flat 52 Newman House Gaywood Estate St Georges Road
- 42 Hayles Street London Southwark
- 24 Hayles Street London Southwark
- 4 St Georges Buildings St Georges Road London
- 16 Metropolis Oswin Street London
- 10 Metropolis Oswin Street London
- 10 Hayles Buildings Elliotts Row London
- 55A St Georges Road London Southwark
- 56 Hayles Buildings Elliotts Row London
- 47 Hayles Buildings Elliotts Row London
- 41 Oswin Street London Southwark
- 31 Oswin Street London Southwark
- 67 Elliotts Row London Southwark
- 64 Elliotts Row London Southwark
- 28 Hayles Buildings Elliotts Row London
- 26 Hayles Buildings Elliotts Row London
- 16 Hayles Buildings Elliotts Row London
- Flat 55 Prospect House Gaywood Estate Gaywood Street
- Flat 44 Prospect House Gaywood Estate Gaywood Street
- Flat 20 Prospect House Gaywood Estate Gaywood Street
- Flat 10 Prospect House Gaywood Estate Gaywood Street
- Flat B 15 Princess Street London
- Flat A 20 Gaywood Street London
- 40 Princess Street London Southwark
- Flat 40 Perronet House Gaywood Estate Princess Street

- Flat 34 Perronet House Gaywood Estate Princess Street
- Flat 2 49 Elliotts Row London
- Flat 3 50 Elliotts Row London
- Flat 14 Wardroper House 62 St Georges Road
- Flat 6 Wardroper House 62 St Georges Road
- Flat 4 Wardroper House 62 St Georges Road
- Flat 3 54 Elliotts Row London
- Flat A 46 Elliotts Row London
- Flat C 13 Hayles Street London
- Flat 8 43 Oswin Street London
- Unit 11A Elephant Arcade 50 London Road
- Flat 6 Perronet House Gaywood Estate Princess Street
- 52 Hayles Buildings Elliotts Row London
- 12 Hayles Buildings Elliotts Row London
- 51A St Georges Road London Southwark
- 28 Hayles Street London Southwark
- 10 St Georges Buildings St Georges Road London
- Flat B 46 Elliotts Row London
- Flat 41 Prospect House Gaywood Estate Gaywood Street
- Flat 1 Prospect House Gaywood Estate Gaywood Street
- 43 London Road London Southwark
- Flat 2 Wardroper House 62 St Georges Road
- Flat 38 Perronet House Gaywood Estate Princess Street
- Flat B 18 Gaywood Street London
- 33 Gaywood Street London Southwark
- 3 Hayles Street London Southwark
- Lamlash Street Allotments Lamlash Street London
- 60 Hayles Buildings Elliotts Row London
- 13 Gaywood Street London Southwark
- 32 Hayles Buildings Elliotts Row London
- 35 Hayles Street London Southwark
- Flat B 60 St Georges Road London
- Flat 10 Perronet House Gaywood Estate Princess Street
- Flat B 9 Princess Street London
- Flat 81 Perronet House Gaywood Estate Princess Street
- Flat 55 Perronet House Gaywood Estate Princess Street

**Re-consultation:**

Re-consultation letters were sent to all those members of the public who made representations about 21/AP/2838 as part of the original round of consultation.



## Appendix 5: Consultation responses received

### Internal services:

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

### Statutory and non-statutory organisations:

Transport for London  
 Environment Agency  
 Great London Authority  
 Historic England  
 London Fire & Emergency Planning Authority  
 London Underground  
 Natural England - London & South East Region  
 Network Rail  
 Metropolitan Police Service (Designing Out Crime)  
 Transport for London  
 Thames Water

### Neighbour and local groups:

- flat 28 prospect house gaywood street london
- 76 Perronet House London SE1 6JS
- 23 Gladstone street London SE1 6EY
- 33 Hayward court Levehurst way Clapham
- 4 Orient street London
- 2 Hayles Buildings Elliott?s Row London
- 70 henshaw street London Se17 1pd
- 177b Brook Drive London SE11 4TG
- 39 Hayles Street London
- 56 Hayles Street London SE11 4SX
- 15 Aldebert Terrace London SW8 1BH
- 14 Lammas Green London SE26 6LT
- 21 West Square London SE11 4SN
- 24 HAYLES STREET LONDON SE11 4SS
- 28 St George's Buildings 37 St George's Road London
- Flat 1, 15 hayles street London Se114su
- Hayles street London Se114su
- 68 Hayles building Elliott?s row London
- 5 Hayles Buildings Elliot's Row London
- 52 Newman House London SE1 6HE
- Flat 40 Sherston Court Newington Butts London
- 48 Monkton Street London SE11 4TX

- 73 St Georges Road Southwark London
- 37 hayles buildings London SE11 4TB
- 37 Wooler Street London SE172ED
- 21 Hayles Street London SE114SU
- Flat 2 St Georges Buildings 37 St Georges Road London
- 12 Cadiz Street Walworth London
- 18 Norbury Cross london SW16 4JQ
- 33 west square London Se11 4sp
- 6 Harmsworth Mews London SE11 4SQ
- Flat 12, Hayles Buildings Elliotts Row London
- 12 Cadiz Street Walworth London
- 45 Perronet House London SE1 6js
- 69 St George's Road London SE1 6ER
- flat 2 71 balfour st london
- 34 Hayles Street London SE114SS
- 62 Perronet House princess street london
- 9 Colnbrook Street London SE1 6EZ
- 53 West Square London SE11 4SP
- 12 Wordsworth Road Bermondsey Se15tx
- 65 Monkton Street London
- 31 Oswin Street London SE11 4TF
- 13 West Square London SE11 4SN
- FLAT 15, HAYLES BUILDINGS ELLIOTTS ROW London
- 10 Tomline House Union Street London
- 39, West Square London SE114SP
- 27 Hayles Buildings Elliotts Row London
- 33 Raikeswood Road Kennington London
- Flat 3, 15 Hayles Street London SE11 4SU
- 8 Hayles Street London SE11 4SS
- 5 Colnbrook Street London SE1 6EZ
- 15 Oswin Street London
- 51 West Square London SE11 4SP
- Flat 23, 6 Waleorde Road Walworth London
- 32b Elliott?s row London SE114SZ
- 24 Hayles Street London London
- 79 Grove Hill Road London SE5 8DF
- 34 Hayles Street London SE114SS
- Apartment 406, Tarling House 3 Walworth Square LONDON
- 32 Glenhurst Court, Farquhar R Farquhar Road LONDON
- 2 Westmacott House Hatton Street London
- 53B Brook Drive London SE11 4TU
- 80 Perronet House Princess Street London SE1 6JS
- 7 James Stroud House Walworth Place London
- 9 Guthrie Court Morley Street London
- Flat 32, Perronet House Princess Street London
- 8 West Square London SE11 4SN
- 7 Harmsworth Mews London SE11 4SQ
- 7 Orient street London SE11 4SR
- 4 Hayles Street London SE11 4SS
- 177 Brook Drive Flat B London
- 98 Mary Datchelor Close London SE5 7DY
- Hayles building flat 58 Elliotts row London
- 37B Oswin street Kennington SE114TF
- 15 Hayles Street London SE114SU
- FLAT 11, METROPOLIS 1 OSWIN STREET LONDON
- 10 Tomline House Union Street London
- 137 St Georges Road London SE1 6HY
- 33 Perronet house Princess st London
- 74 Perronet House Princess st London
- 7 Dawes House London SE171RE
- 89 perronet house Princess st London
- 64 Perronet House Princess Street London
- 13 St Giles Road London SE5 7RL
- 125b brook drive London Se11 4tw
- 3 Orient Street London SE11 4SR
- 18 Gladstone Street London SE1 6EY
- 19 Romola road London SE24 9BA
- 25 Hayles St London SE11 4SU

- 40 Hayles Buildings, Elliotts Row London SE11 4TB
- Andy 48 Perronet House London
- 22 WEST SQUARE LONDON SE11 4SN
- 30 Kirwyn Way London SE5 0YA
- Arments Court London Se5 0df
- 22b Hayles Street London
- 15 Hayles Street London SE11 4SU
- 28 Sutherland Square London SE17 3EQ
- 25 King Edward Walk London SE1 7PR
- 40 Hayles Buildings Elliotts Row London
- 55 Rye Park London SE15 3JN
- Flat 11 Triumph House 1C Gunnersbury Lane London
- 13 west square London SE11 4SN
- 75 Perronet House Princess Street London
- 4 Temple West Mews West Square London
- 67 Elliott's Row London SE114SZ
- 15 Oswin Street London SE11 4TF
- 66 Brook Drive LONDON SE11 4TT
- Flat 11, Hayles Buildings Elliotts Row London
- Flat 14 71/89 Brook Drive SE11 4TR
- 171 Brook Drive London SE114TG
- 42 West Square London SE11 4SP
- 2 Naylor Road London
- 12 Hayles Street London SE11 4SS
- St. George's buildings flat 20 37 st Georges Road London
- 22b Hayles Street London SE11 4SS
- Flat 39 Hayles Buildings Elliott's Row London
- 30 West Square London se11 4sp
- 65 Monkton Street LONDON SE11 4TX
- Flat 4 3-5 Oswin Street London
- Flat 2 St George's Buildings London
- Flat A, 59 Brook Drive, LONDON
- 35 St Georges Road London SE16EW
- Flat 2 5 Oswin Street London London SE11 4TF
- 3 Orient Street London SE11 4SR
- 29 Gladstone Street London SE1 6EY
- Flat 38 Hayles Buildings Elliotts Row London
- 50 West Square 50 west square London
- 50 West Square London SE11 4SP
- Flat 3 48 Elliott's Row London
- Flat 3 1 Colnbrook Sreet London
- Flat B 46 Elliott's Row London
- 50 Elliotts Row London SE11 4SZ
- 5 Oswin street London SE11 4TF
- 17 West Square London SE11 4SN
- 1 Oswin street Metropolis Flat 18 London
- 75 St. Georges Road, London SE LONDON SE16ER
- 40 Newman House Garden Row London
- Elliotts row Hayles buildings London
- 77 St George's Road London SE1 6ER
- 110 St Georges Road London SE1 6EU
- Flat 3 15 Hayles Street London
- 61 hayles buildinds, Elliotts row. London
- 32 Hayles Street London SE11 4SS
- 171 Brook Drive London SE11 4TG
- Flat 14 Perronet House Gaywood Estate Princess Street
- Flat 20, St Georges Court, Garden Row, London SE1 6HD
- 31 Hayles Street London London
- 59 perronet house 59 london
- 1 Hayles Street London Southwark
- Perronet house Princess street London
- 75 Ennersdale Road London Se135jd
- 177 Cator Street Ground floor flat London
- Flat 81 Perronet House Gaywood Estate Princess Street
- 17 West Square London SE11 4SN
- 42 Cleaver Square London Se11 4ea
- 14 perronet house Princess St London
- Flat 6 5 Oswin Street London
- Flat 1, 3 Oswin Street London SE114TF
- 171 Brook Drive London SE11 4TG

- 65 Monkton Street London SE11 4TX
- 38 Hayles Street London SE11 4SX
- 42 Dawes House Orb Street London
- Hayles Street 25 London
- 13 Perronet House London SE1 6JR
- Flat E 85 Balfour Street London
- 49 West Square London SE11 4SP
- Flat 15, Cowper House London SE17 1DD
- 20 Princess Street LONDON
- 57 Newman House St. George's Road London
- 21 HAYLES BUILDINGS ELLIOTTS ROW LONDON
- 7 Hayles Street London SE11 4SU
- 20, West Square London SE11 4SN
- 31 West Square London SE11 4SP
- 34 Hayles street Kennington London
- 8 Hayles Street London SE11 4SS
- 38 West Square London SE11 4SP
- 53 Ambergate Street London SE17 3RZ
- 57 Newman House St. George's Road London
- 177 Cator Street, Ground floor flat LONDON SE15 6AA
- 12 Hayles Buildings Elliotts Row London
- 28 West Square London SE11 4SP
- 20 aird house Rockingham street London
- 41 West Square London SE11 4SP
- 4B Charleston Street LONDON SE17 1NF
- Flatt 11, Laurie House Gaywood Street London
- Flat 159, Wedgwood House Lambeth Walk LONDON
- 59 Hayles Street London SE11 4SU
- 28 Whittlesey Street London SE1 8TA
- 34 Lulworth house Portland street London
- 171 Brook Drive London SE11 4TG
- 7 princess st London Se1 6hh
- 177 (flat b) Brook Drive London SE11 4TG
- 171 Brook Drive London SE11 4TG
- 62 Perronet house princess street London
- Flat 59 Hayles Buildings, Elliotts Row London
- 4 Temple West Mews, West Square West Square London
- 64 Elliotts Row London SE11 4SZ
- 47 West Square London SE11 4SP
- 39, West Square London SE11
- Flat 1, 3 Oswin Street London SE11 4TF
- Flat 72 Hayles Buildings Elliott's Row London
- 34 Hayles St London SE114SS
- Flat 607 9 steedman street London
- 22 Dawkins Court 2 Garland Close London
- 28 hayles building Elliot's row London
- 1 Hayles street London SE114SU
- 66 Trafalgar Avenue London SE15 6NR
- Flat 4, 5 Waleorde Road London
- 38 Hayles Street London se11 4sx
- 50 Elliott's row London Se114SZ
- 23 Renfrew Road London
- 58c St. George's rd London SE1 6ET
- Princess Street London se1 6js
- 75 St. Georges Road LONDON SE1 6ER
- Flat 1 48 Elliott's Row London
- 95 Draper House 20, Elephant and Castle london
- Flat 2 79 Balfour Street 79 Balfour Street London
- 8 West Square London SE11 4SN
- 14 Perronet House Princess St London
- 5 Winchester Wharf 4 Clink Street London
- Flat 159, Wedgwood House Lambeth Walk London
- Brillig Cold Harbour Lane Marlborough
- 28 hayles building 28 hayles building London
- 11 Laurie House Gaywood street London
- 82 iliffe street London Se17 3LL
- 2 Temple West Mews West Square London

- 25 Hayles street London Se11 4SU
- 1C Austral Street london se114sj
- 15 West Square London SE11 4SN
- 5 Oswin Street London SE11 4TF
- 30 West Square London SE11 4SP
- 15 Hayles Street London SE11 4SU
- 52 Newman House London
- 7a Princess street London Se1 6hh
- 18 West Square LONDON SE11 4SN
- Flat 18, 2 Gautrey Road, Nunhead,  
Nunhead, Nunhead, Nunhead  
Nunhead London
- 9 Ariel Court Opal Street London
- 4 Newman House St Georges Road  
London
- 27 London Road Elephant and Castle  
London
- 4 Pullens Buildings Peacock Street  
London



## Appendix 6: DRP Report

### Overview of Southwark Design Review Panel, 15 December 2020

1. Chair: Gerard Maccreanor  
Panel Members: Tom Coward; Jane Dann; Ann Griffin; Carolina Filippini; David Lomax; Mike Stiff
2. Project architects: Latitude Architects  
Project clients: CAM  
Project planning consultants: DP9
3. The Panel welcomed the opportunity to review this important proposal and thanked the Applicants for their clear and detailed presentation. The presentation was circulated to the Panel in advance and included additional townscape model views from various approaches.
4. The Panel investigated further:
  - The operator who would take on this mix of uses and how their requirements had informed the design
  - What options were tested to modulate the massing of the tower – especially in relation to the lower portion to the rear
  - How the features in the LCC scheme related the proposals on pre-fabrication, this site
  - A modular solution
  - Sustainability – aiming for excellent – should this not be ‘outstanding’
  - How realistic the proposed street trees are
  - The involvement of a landscape architect
  - The views that were tested – especially from the West Square and Elliotts Row CAs
  - The use of and relationship with the ‘Pocket Park’
  - How realistic the back-of-house functions are for the hotel, commercial and retail functions?
  - Vertical transportation study – very important given the mix of uses
  - The disabled parking bay
  - The design of the street-facing portion of the building
  - The design of the building facing onto the Pocket Park – green wall vs windows.
5. The Panel encouraged the re-development of the site but were cautious about the proposal due to the complexity of the overlapping uses and the sheer quantum of accommodation proposed. They recognised that this could result in a bespoke solution that was not necessarily inappropriate. They raised a number of questions that they encouraged the design team to resolve as they developed the proposal.

### Public realm

6. When they considered the public realm proposed in this scheme they highlighted that this is largely provided outside the footprint of this severely constrained site. The Panel questioned how realistic the proposed street trees would be and whether the kiosks on St Georges Road could be moved. They stressed that the removal of the kiosks was essential and not just desirable. The main public realm offer was the nearby 'pocket park' not in the same ownership as the proposal but an important piece of open space in the neighbourhood.
7. The Panel highlighted that the relationship between the lower levels of the proposal and the pocket park are unresolved. There needs to be a positive relationship between the new building and the park that can work for both. It was felt that this proposal could and should significantly contribute to the upgrade of the pocket park.
8. They urged the early involvement of a landscape architect to test the potential for street trees, to develop a proposal for the pocket park and to help with the design of the lower reaches of the building. In particular the potential for green walls and green roofs will require the involvement of specialists to ensure that these can be delivered. The Panel encouraged the design team to engage with the community that owns the Pocket Park to develop a design that they will welcome.
9. In a follow-up e-mail to the council the Applicants confirmed that following discussions with the custodians of the pocket park to the west of the site, it is now clear that the space is accessible to the general public, not just the residents of the Hayles Building.
10. It will also be critical to introduce active uses across the ground floor and maximise its potential. The Panel encouraged the designers to review the layout of the ground floor again – the spaces that will interact directly with the public realm – to optimise access and vertical circulation and to ensure that the service spaces needed for all the uses are adequately accommodated which is difficult in the current layout. At the moment the proposal appears unrealistic and that too much is being crammed into this severely constrained site.

### Height scale and massing

11. The Panel recognised the transitional nature of the site and that significant weight should be given to the planning permission of the LCC scheme to the east. At the same time the site is largely surrounded on three sides by conservation areas and the proposed height will affect the character of these historic areas. They concluded that the site could take some height but that it



should mediate between the established character of Oswin Street and St George Road, and that of the Elephant and Castle core area.

12. The Panel felt the proposed height was sensitive and a matter of judgement. The Panel was split on the issue of building height with some members finding the proposed height to be acceptable while others highlighted that, in the views from Oswin Street, the change of scale was uncomfortable and suggested that the height should be lowered – closer to 8 or 10 storeys.
13. All Panel members encouraged the designers to look again at the lower reaches of the building and especially at the 3/ 4-storey portion to the rear which could perhaps rise slightly, in order to offset the excessive height on St George's Road.
14. The Panel noted that accurate rendered views from Oswin Street had not been properly presented. In developing the design further with the Planners, they felt this lower part of the design could also help to mediate in the views from Oswin Street.

### Architectural design

15. The Panel generally welcomed the narrow proportions and articulated form of the tower. They questioned the practicality of such a narrow footprint and how realistic this would be for the mix of uses proposed. Whilst there was insufficient information about the precise choice of cladding materials and detailed design, the Panel were encouraged by the direction of travel in the architectural design. The Panel felt more work was required on the elevations and that sufficient detail design is submitted with any application to guarantee the quality proposed.
16. They highlighted the lower regions of the building which is where the design will relate more closely with the street. The lower four storeys form the base of the tower and include the publicly accessible uses of the building. In this respect they Panel felt it related too closely to the Elephant and Castle towers and not the street-scene of its more closely to its immediate neighbours. They encouraged the designers to introduce a more human scale at the base and to align the architecture of the base more closely to its immediate context; the Georgian properties on St Georges Road and the mansion blocks on Elliotts Row; and introduce some architectural richness at the base of the building.
17. Whilst the architecture, the scalloped design and rhomboid form, hold some promise, the Panel felt the proposal was severely constrained and difficult to deliver. The Panel encouraged the early involvement of a hotel/co-working operator and a fire strategy to inform the building control principles for the design in order to better define how the building will be used and serviced in the long term.

### Sustainability and environmental impact

18. The Panel felt the proposal lacked a degree of ambition in terms of sustainability. The bespoke nature of the design, the imperative to address the climate crisis and the need to deliver exemplary design imposes the additional duty on towers to be more sustainable. They felt the circularity proposed was tenuous and the lack of natural ventilation resulted in an energy model that lacked the refinement necessary of such proposals. A more appropriate measure may be something like the RICS whole life carbon calculation which could help to establish the environmental credentials of this proposal.
19. When the Panel considered the environmental impact of the proposal they understood the initial wind and micro-climate and encouraged the design team to test this more rigorously especially in the context of the other towers nearby. This is especially important in the context of the pocket park and the streets nearby. Given there are a number of tall buildings in this area it is imperative that this proposal as well as the cumulative environmental impact is tested and reported to the Planners so that the architectural and landscape design can be updated to address any issues.

### Conclusion

20. The Panel were generally optimistic but cautious about this proposal. They concluded that the design held some promise but they had significant concerns about its feasibility because of its significantly constrained site and limited accommodation for back-up and support spaces. They questioned the proposed height and requested more details about the landscape and detailed architectural design and encouraged the designers to amend the scheme to address their concerns.

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## Appendix 7: Floorspace Schedule

### FLOORSPACE SCHEDULE

<u>Use (Class)</u>	<u>Floor(s)</u>	<u>Description of unit/space</u>	<u>GIA (sq.m)</u>
C1 (hotel)	00 to 14	Bedrooms, hotel-exclusive facilities and circulation areas, share of the reception (shared with office)	2,848.4
C1 (ancillary to hotel)		Proportion of shared facilities (plant, back-of-house etc.)	675
<b><u>Total Class C1</u></b>			<b><u>3,523.4</u></b>
E/SG (retail/takeaway)	00	Micro retail unit	20.5
E/SG (ancillary to retail/takeaway)		Proportion of shared facilities (plant, back-of-house etc.)	4.9
<b><u>Total Class E/Sui Generis (mixed retail/takeaway)</u></b>			<b><u>25.4</u></b>
E (retail)	00	Restaurant/café	74.8
	-01 to -02	Restaurant/café store room	16.5
E (ancillary to retail)		Proportion of shared facilities (plant, back-of-house etc.)	21.6
<b><u>Total Class E (retail)</u></b>			<b><u>112.9</u></b>
E (office)	-01 to 02	Dedicated office floorspace, office-exclusive facilities and circulation areas, share of the reception (shared with hotel)	580.8
E (ancillary to office)		Proportion of shared facilities (plant, back-of-house etc.)	137.6
<b><u>Total Class E (office)</u></b>			<b><u>718.4</u></b>

<b>TOTAL PROPOSED GIA (sq. m)</b>	<b><u>4,380.1</u></b>
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## Appendix 8: Existing And Pipeline Visitor Accommodation

### EXISTING AND PIPELINE VISITOR ACCOMMODATION WITHIN A 750M RADIUS OF THE APPLICATION SITE

<u>Hotel name</u>	<u>Format</u>	<u>Status</u>	<u>No. of rooms</u>
<u>Within a 250 metre radius</u>			
None	N/A	N/A	N/A
<u>Within a 251 to 500 metre radius</u>			
The Bridge Hotel, 30 Borough Road	Budget	Existing	33
H10 London Waterloo, 284-302 Waterloo Road	High-end	Existing	177
Brit Hotels (formerly the Hampton Court Palace Hotel), 35 Hampton Street	Budget	Existing	13
Travelodge, Ceramic Building, 87 Newington Causeway	Budget	Existing	140
Castle Hotel, 86 Walworth Road	Budget	Existing	21
Safestay Hostel, 144-153 Walworth Road	Hostel	Existing	74 (407 beds)
Total:			<u>458</u>
<u>Within a 501 to 750 metre radius</u>			
Travelodge London Central Waterloo, 195-203 Waterloo Road	Budget	Existing	279
Captain Bligh House, 100 Lambeth Road	Budget	Existing	5
The Collective, 19-23 (odds) Harper Road	Mid-range	Extant but unimplemented	328
London Full House Guest House, 116 New Kent Road	Budget	Existing	12
Big Ben Budget Rooms, 40 Wansey Street	Budget	Existing	3
Safestay London Elephant & Castle, 144-152 Walworth Road	Hostel	Existing	76
		In construction	12

Manor of Walworth, 140-142 Walworth Road	Mid-range	Existing	6
		In construction	14
Proposed hotel, 160 Blackfriars Road	Mid-range	Extant but unimplemented	169
		In planning	53
The Steam Engine, 41- 42 Cosser St	Hostel	Existing	5 (47 beds)
Waterloo Sub Hotel and Suites (formerly Days Hotel), 54 Kennington Rd	Budget	Existing	162
The Ship Rooms, 171 Kennington Rd	Budget	Existing	6
Hampton by Hilton Waterloo, 157 Waterloo Rd	Mid-range	Existing	297
Total:			<u>1427</u>
Grand Total (all formats, all statuses):			<u>1885</u>
...which breaks down as:			
<u>1314</u> existing or in construction		<u>571</u> pipeline (extant but implemented, in planning or deferred)	



21/AP/0681

24 CRIMSCOTT STREET, LONDON SE1 5TE



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Scale = 1:10000000

16-Mar-2023



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<b>Item No.</b> 7.2	<b>Classification:</b> OPEN	<b>Date:</b> 29 March 2023	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>	<b>Development Management planning application:</b> Application 21/AP/0681 for: FULL PLANNING APPLICATION  <b>Address:</b> 24 CRIMSCOTT STREET, LONDON SE1 5TE  <b>Proposal:</b> 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, secure cycle parking, refuse and recycling facilities and other associated works. REVISED DESCRIPTION		
<b>Ward(s) or groups affected:</b>	Old Kent Road		
<b>From:</b>	DIRECTOR OF PLANNING AND GROWTH		
<b>Application Start Date</b>	30/03/2021	<b>Application Expiry Date</b>	29/06/2021
<b>Earliest Decision Date</b>	30/05/2021		

## RECOMMENDATION

1. a) That planning permission is granted, subject to conditions, and the applicant entering into an appropriate legal agreement by no later than the September 29<sup>th</sup> 2023
2. b) In the event that the requirements of (a) are not met by September 29<sup>th</sup> 2023 that the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 221 of this report.

## EXECUTIVE SUMMARY

Commercial GIA:

Use Class	Existing	Proposed	Change +/-
<b>Class B1 (c) (light industrial)</b>	427sqm	0sqm	-427sqm

<b>Class E (offices / workspace)</b>	0sqm	2525sqm	+2525sqm
<b>Jobs</b>	9	Up to 165	+156

Environmental:

<b>CO2 Savings beyond part L Building Regs</b>	52% - non-domestic element
<b>Trees lost</b>	1
<b>Trees gained</b>	3

	Existing	Proposed	Change +/-
<b>Urban Greening Factor</b>	0	0.47	+0.47
<b>Surface water run off rates (6-hour in 100 year)</b>	1.38 l/s	2.0 l/s (minimum restricted discharge rate accepted by Thames Water and greenfield offset agreed)	+0.62 l/s
<b>Green/Brown Roofs</b>	0sqm	156sqm	+156sqm
<b>Cycle parking spaces</b>	0	50	+50

CIL and S106 (Or Unilateral Undertaking):

<b>CIL (estimated)</b>	£25,523.13
<b>MCIL (estimated)</b>	£154,512
<b>S106</b>	<ul style="list-style-type: none"> <li>• Carbon Offset - £29,811</li> <li>• Trees - £38,313</li> <li>• Archaeology - £3,389</li> <li>• Greenfield Run-off Rates - £7,027.20</li> </ul>

## **BACKGROUND INFORMATION**

### **Site location and description**

3. The subject site is located on Crimscott Street, to the immediate south is the junction with Willow Street, with existing industrial buildings to the north and west. The Site comprises 0.035 hectares and is currently occupied by a vacant two storey brick warehouse building, and hard-standing car park areas to the front (off Crimscott Street and to the side off Willow Walk). The previous occupier, Benwell Sebard Ltd, which operated as a printing business vacated the building in February 2019 and have relocated to Sidcup (London Borough of Bexley).
4. The surrounding area is characterised by a mix of architectural styles and uses. The redevelopment of the Rich Industrial Estate is located in close proximity to the application site. Crimscott Street is primarily made up of industrial warehouses and factories with Victorian terrace dwellinghouses located on nearby Pages Walk, with purpose-built housing estates (including the Harold Estate) and modern developments including Twist House also located nearby to the subject site.
5. 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).
6. The site is within an Urban Density Zone and an Air Quality Management Area. The site is located in Flood Zone 3 as identified by the Environment Agency. The site is not within a Conservation Area, nor are there any listed buildings on or within close proximity to the site. However, the subject site is located adjacent to Page's Walk Conservation Area and within 200m to the Bermondsey Street Conservation Area. Additionally, the site is designated as being within North Southwark and Roman Roads Archaeological Priority Area.
7. 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.
8. The Bakerloo Line Extension (BLE) project is paused subject to funding. Safeguarding still remains for the future provision of the BLE.

### Image: Site Plan



### Details of Proposal

9. Planning permission is sought for the Demolition of existing building and redevelopment to provide an eight storey building comprising flexible Commercial, Business and Service floorspace (Class E(g)) along with public realm improvements, landscaping, secure cycle parking, refuse and recycling facilities and other associated works.
10. The subject scheme has been amended from a mixed commercial and residential scheme where 9 new residential units were initially proposed, to a scheme that is entirely commercial. In addition, the initial proposed 9 storeys has been reduced down to 8 storeys in line with the requirements of the draft OKR AAP. This results in a decrease in building height from 29.7m AOD, to 27.7m AOD.
11. 2,525sqm of commercial floorspace comprising of co-working and office space is proposed over basement to seventh floor. Ancillary plant equipment of 153sqm is proposed in the basement level with the remaining 2,372sqm of floorspace provided from ground level and above. The ground floor commercial space forms part of the Affordable workspace offer from the redevelopment of the site. Overall, there would be an uplift of 2,098sqm on the existing commercial floorspace provision on site.
12. Cycle Parking will be provided in accordance with the London Plan and Southwark Plan requirements. 50 secure cycle parking spaces are proposed comprising of 38 long stay cycle spaces, and 12 short stay spaces. 38 cycle parking spaces by means of two-tier racks are to be located securely on the ground floor of the development. Externally 5 Sheffield stands (10 spaces at 1.0m spacing), and 1 Sheffield Stand (2 spaces at wide spacing 1.8m) are proposed adjacent to the existing street tree. The amount of cycling parking proposed exceeds the minimum requirement of 44 spaces in line with local and London Plan policies. In addition, the development will be car free with no on-site parking proposed. A S106 obligation to restrict office tenants from applying for on-street parking permits has been agreed with the applicant.

13. A new loading / servicing bay is proposed and has been designed for the use of delivery vans similar to a 7.5t panel van and will also allow refuse collection vehicles to pull in so as not to block the through flow of traffic along Crimscott Street. The location of the refuse area on the ground floor will allow for ease of access in collecting refuse within the development.

**Table: Proposed land uses**

Land Use	Use Class	GIA
Commercial	E	2,525sqm

### Revisions and Amendments

14. The initial scheme submitted on 30.03.2021 proposes a mixed use scheme with the following description:

*Demolition of existing building and redevelopment to provide a nine storey building (29.7m AOD) comprising flexible Commercial, Business and Service floorspace (Class E(g)) and residential dwellings (Class C3), along with public realm improvements, landscaping, private and communal amenity space, secure cycle parking, refuse and recycling facilities and other associated works.*

15. Following objections to the development from neighbours, and the revision of height in the amended Draft OKR AAP from a maximum of 9 storeys on Crimscott Street down to 8 storeys, the applicant has amended the application to an eight storey commercial development. 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. Documents and drawings related to the revised scheme were submitted to Southwark on 09/09/2021.

### **SUMMARY OF CONSULTATION RESPONSES**

16. 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 (April 2021). A second round was undertaken following the submission of amended plans (September 2021).
17. At the time of writing, a total of 67 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. 62 of the responses are against the proposed development, with the remaining 5 responses in support. It is noted that the 5 supporters responded to the initial consultation that proposed a mixed-use scheme and supporting the introduction of residential units; however, no support responses were received for the revised commercial only scheme.



18. Objections  
The main issues raised by residents objecting to the proposed development (both original residential and amended commercial only) are set out below:
19. Height scale and massing – The height of the original scheme proposed 9 storeys when the Draft OKR AAP for Crimscott Street recommends a height of 6-8 storeys, and 4-5 storeys on Willow Walk. After the scheme was revised down to 8 storeys, the height was again objected to given the location of the development at the junction between Crimscott Street and Willow Walk.
20. *Officer response:* It is noted that the development is located at the junction of Crimscott Street and Willow Walk and its height of 27.7m is consistent with the heights of Plots 3 and 4 within the Rich Estate approved development adjacent to the development, and are also located on the corner of Crimscott Street and Willow Walk. The image contained within paragraph 91 of this report demonstrates the similar heights of plots 3 and 4 of the Rich Estate at a lower height of 26.7m and a maximum height of 29.93m. Additionally, the proposal features a setback at the ground floor to both street elevations to allow the public realm to extend. This consists of setbacks of 4.8- 5.7 and 2.4 metres to the Willow Walk and Crimscott Street elevations respectively.
21. Land Use - Objection comments regarding the use of Residential and Office Uses over Light Industrial uses. The first round of consultation responses objected to residential uses. As part of the amended submission in September 2021, the residential element was removed to accommodate a proposed office development to all floors.
22. *Officer 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.
23. Impact on Pages Walk Conservation Area – Objection comments expressed concern over the modern design of the building having a detrimental impact on the setting of the nearby Pages Walk Conservation Area.
24. *Officer response:* The scheme, when viewed from the street of Pages Walk will not be visible from the west or east side of the Pages Walk footpaths. The reduction in height of the building to 8 storeys ensures that the building will be obscured by the existing buildings on Pages Walk. Whilst it is acknowledged that the building would be visible from the public realm of Guinness Square above the roof line of the 1-8 The Willows, and is also visible adjacent to 43-73 Pages Walk. The scheme will be seen in front of the Rich Estate development from this view. The potential impact to nearby heritage assets such as the Pages Walk Conservation Area is detailed further in the main body of the report.
25. Architectural design – Comments received from the public objected to the architectural materiality of the scheme.
26. *Officer response:* The materials chosen for this development have been selected based on the specific history of the site. From the early 1800's until the late 1960's, the site housed an Iron Foundry. The material palette draws inspiration from this, with the design of the building also taking cues from other historic corner buildings around Bermondsey such as the Morocco Store and the Star and Garter Public House

27. Loss of daylight/sunlight to nearby properties – Consultation responses expressed concern over the loss of daylight and sunlight to nearby residential properties owing to the height of the development.
28. *Officer response:* The submitted daylight/sunlight report demonstrates that there would not be significant adverse impacts on the daylight and sunlight to neighbouring areas.
29. Affordable workspace being subject to viability – Comments were received highlighting that at least 10% of the affordable workspace should be provided
30. *Officer response:* This is discussed further in the relevant body of the report. Affordable workspace obligations are also to be secured in the S106 Agreement attached to the granting of any planning permission.
31. Lack of Affordable housing – This was a concern raised during the initial scheme that any residential development should provide affordable housing.
32. *Officer response:* The revised scheme removed residential units to provide an office only scheme.
33. Lack of improvement to transport in the area – Objections expressed concern over transport links being improved in the area
34. *Officer response:* The development would be liable for Mayoral CIL and would make s106 contributions towards a cycle docking station and carbon offsetting projects.

## **External Consultees**

### Environment Agency

35. No objection to planning permission being granted. Informative recommended on any planning permission granted.

### London Underground

36. No comments to make on the application.

### Metropolitan Police

37. The Designing Out Crime Officer has advised that they met with the applicants and from the discussion the Officer is confident that the development can achieve Secured By Design accreditation.
38. Officer response: A condition regarding the development achieving this accreditation is attached to this permission.

### National Air Traffic Safeguarding Office (NATS)

39. The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

### Thames Water

40. On the basis of information provided, Thames Water would not have any objection to the above planning application subject to conditions and informatives.
41. With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. <https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services>.
42. There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.
43. The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission.

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

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure.

44. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk) Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

45. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "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](mailto:trade.effluent@thameswater.co.uk) . Application forms should be completed on line via [www.thameswater.co.uk](http://www.thameswater.co.uk). Please refer to the Wholesale; Business customers; Groundwater discharges section. Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.
46. If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at [thameswater.co.uk/buildingwater](http://thameswater.co.uk/buildingwater). On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
47. Officer response: The recommended condition and informatives have been attached to this decision notice of this application.

#### UKPN Network

48. No response from UKPN on the initial consultation, or the re-consultation letter for the revised scheme

#### **Internal Consultees**

49. 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

50. The main issues to be considered in respect of this application are:
- The principle of the proposed development in terms of land use and the release of the site from its industrial designation;
  - Affordable workspace;
  - Design, layout, heritage assets and tall buildings 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;
  - Wind microclimate;
  - Equalities and human rights;
  - Statement of community involvement

## Legal Context

51. 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 NPPF, London Plan 2021, the Southwark Plan 2022, and the Draft OKR AAP.
52. There are also specific statutory duties in respect of the Public Sector Equalities Duty which are highlighted in the relevant sections in the overall assessment at the end of the report.

## EQUALITIES

53. 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.
54. 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.
55. The proposed development would generate additional opportunities for local employment. The proposed development would deliver 2,525sqm (GIA) of E(g) Use Class floorspace resulting in an uplift of 2,098sqm on the existing provision. Furthermore, the 10% Affordable Workspace proposed will be secured through the S106 Agreement. The new development would be fully accessible which would benefit disabled individuals in terms of access jobs. The affordable workspace could potentially benefit local BAME business users.

### Conclusion on Equality Impacts

56. 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.

## **ENVIRONMENTAL IMPACT ASSESSMENT**

57. 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**

58. 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.
59. The Draft OKR AAP has 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. In terms of residential capacity, to date 557 homes have been built or have planning permission within this site allocation, with a further 48 being subject to a planning application yet to be determined giving a total of 605 homes. Other sites within this allocation are likely to come forward for mixed use development. The use of this site for commercial purposes only would not undermine the delivery of the housing allocation.

60. The existing use on site is not considered to maximise the potential of this Opportunity Area Proposal Site. The proposed re-development of the site would introduce a commercial building comprising of 2,525sqm of Use Class E(g) floorspace. It is anticipated that the scheme would deliver major regeneration benefits that are further discussed in the proceeding parts of this report.

**Image: Sub Area 1 focused on OKR 2 with subject site outlined in red**



Image: Typologies map of Sub Area 1 – Site located in red



## Industrial Land

61. The site is no longer has an industrial designation in the Southwark Plan. Strategic Policy 4 (Green and inclusive economy) of the Southwark Plan encourages the delivery of at least 460,000sqm of new office space between 2019 and 2036 (equating to around 35,500 jobs). Around 80% of new offices will be delivered in the Central Activities Zone. Additionally, offices will be delivered in the Canada Water and Old Kent Road Opportunity Areas and in town centres.
62. The London Plan 2021 identifies LB Southwark as a borough which should retain industrial capacity.
63. The Old Kent Road was designated as an Opportunity Area through the previous iteration of the London Plan, with an indicative capacity of 1,000 new jobs and a minimum of 2,500 new homes. However, this has been increased to an indicative



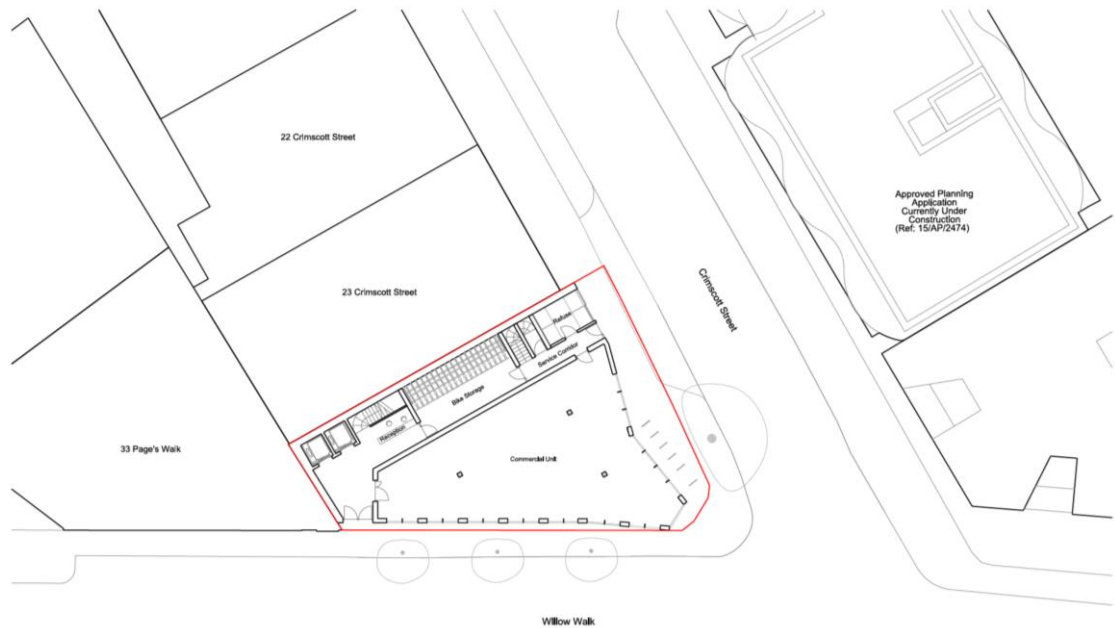
capacity of 12,000 homes, and 5,000 new jobs in the New London Plan (2021). The Draft OKR AAP sets targets of 20,000 new homes and 10,000 new jobs, to be supported by new infrastructure, including parks and schools. It proposes the release of a substantial part of the Strategic and local Preferred Industrial Location designation to allow for the creation of mixed use neighbourhoods where new and existing businesses would co-exist with new homes. This release has now been confirmed in the recently adopted Southwark Plan.

64. The subject site is allocated within the Southwark Plan as part of Site Allocation NSP 57 which allocates the site as part of a wider regeneration area. Site allocation NSP 57 (Crimscott Street and Pages Walk) seeks a comprehensive mixed-use redevelopment of the site to include the delivery of new homes alongside community and employment uses. The image above, Typologies Map of OKR 2, identifies the building uses for OKR 2. The subject site is identified as suitable for small light industrial units in addition to residential use.
65. In acknowledging the above, given the tight constraints of the site, a commercial/office/studios development is considered an acceptable way of delivering the overall mix of land uses identified in the site allocation. The reasoning for this is twofold. Firstly it has proven difficult to accommodate both housing and commercial uses within the relatively small plan area of the site. By having a single commercial use typology the development is able to accommodate relatively simple and flexible floorspaces that can be serviced from the ground floor. This enables the layouts of the floorspaces within the development to be open plan to suits individual user needs. Secondly and as set out earlier in this report the housing delivery target in this allocation has almost been achieved. It is therefore considered that the commercial office/studio mix is considered a suitable typology for the site.

### Employment Re-provision (No Net Loss)

66. Draft Policy AAP 5, and Southwark Plan Policy P30 require developments to retain or increase the amount of employment floorspace on site (Use Class E(g)) or sui generis employment generating uses). The development would provide 2,525sqm GIA of floorspace, in comparison to the existing floorspace of 427sqm GIA. This is a significant uplift on employment floorspace currently on site.

**Image: Ground floor layout demonstrating the affordable workspace**



**Job Creation**

67. An Economic Statement, prepared by BNP Paribas, has been submitted with this planning application. The previous occupier, Benwell Sebard Ltd, which operated as a printing business accommodated a maximum of 9 on site jobs. The proposed development would have the potential to support up to 165 jobs, based on official employment yield contained within the Homes & Communities Agency (2015) Employment Density Guide. This would therefore result in a significant uplift in employment opportunities for local people.
68. The Council's Local Economy Team (LET) has been consulted and raised no objection to the scheme. LET officers recommend that given the total space of the development is 2,836sqm GEA of non-residential, the development would trigger end-user employment obligations. Using the usable employment (Class E(g)) space of 1,689sqm NIA, LET officers would expect 12 jobs set aside after completion for unemployed Southwark residents. This obligation is to be secured through the S106 Agreement.

**Assessment of Main Town Centre Uses**

69. The subject site is designated within the Southwark Plan as being part of the Old Kent Road North District Town Centre. Given that the development would provide commercial and office space it is considered that the scheme would help to deliver the future aspirations of the Town Centre.

**Affordable workspace**

70. Southwark Plan Policy P31 (affordable workspace) includes a requirement for development proposing over 500sqm of employment space to include 10% of the proposed gross new employment floorspace as affordable workspace on site. The Applicant has held detailed discussions with Southwark Studios, an affordable workspace operator who build and manage affordable workspace for individual artists and small businesses in the creative industries and have over 700 local, Southwark-based Small and medium enterprises on their waiting list for affordable workspace.
71. The development proposes the 165sqm ground floor unit as the affordable workspace offering within the development, amounting 9.76%. In acknowledging the minor shortfall, it is noted that in discussions with Southwark Studios that the space must be designed to operate independently from the upper floors. The ground floor is therefore the most suited space for affordable workspace studios because of its taller ceilings (4m floor to ceiling height) and the option to fit out and operate independently of the upper floors. The floor area of the affordable workspace unit is therefore restricted by the need to accommodate all supporting facilities such as cycle stores and refuse, and the floorspace cannot be extended further to meet the P31 target of 10%.
72. To mitigate the minor shortfall below the 10% target, the applicant has agreed that the combination of rent and service charge would be up to £15 psf for the end user. This is considered to be an acceptable mitigation to the minor shortfall of affordable workspace provided on site. This obligation will be secured in the S106 Agreement. In addition, a further S106 obligation regarding fit out of all of the affordable workspace, will be secured in the S106 Agreement.

### **Prematurity**

73. Legal Advice received in relation to this issue highlights the following from the National Planning Policy Guidance:
74. “arguments that an application is premature are unlikely to justify a refusal of planning permission other than where it is clear that the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, taking the policies in the Framework and any other material considerations into account. Such circumstances are likely, but not exclusively, to be limited to situations where both:
- a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging Local Plan or neighbourhood planning; and
  - b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.
75. 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.”

76. 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

77. The scheme would deliver major regeneration benefits, including a significant 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 2 and the surrounding Old Kent Road Opportunity Area (OKROA) should be supported.

## **DESIGN CONSIDERATIONS**

78. 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. With specific reference to tall buildings, Policy D9 of the London Plan (2021), ‘Tall Buildings’ and P17 (Tall buildings) of the Southwark Plan sets out design requirements for tall buildings, both of which are discussed in further detail in the following paragraphs. The tall buildings policies also state that the highest tall buildings will be located in areas where there is the greatest opportunity for regeneration, including Opportunity Areas, such as The Old Kent Road Opportunity Area.

### **Site Layout**

79. The façades along Crimscott Street and Willow walk are setback from the road 4.8-5.7 and 2.4 metres respectively, providing ample public realm space. Tall entrances characterise the base of the building, and there are three distinct doorways. The first is a full-height glazed entrance to co-work and office space. A second service entrance is on Crimscott Street and features a cast iron decorative wall and an illuminated canopy. The ground floor has generous floor to ceiling heights of 4m, and the ground floor commercial unit has a clear lease demise and entrance to both the main lobby and service corridor which allows this space to operate independently of upper floors.

80. Each of the flexible workspaces on floors 01-07 can be accessed through the core lift or the main staircase in the commercial foyer. The areas in common include access corridors, an M1 wheelchair accessible bathroom with a shower, separate toilet cubical and shower rooms. Bathroom provision meets HSE standards assuming a maximum density of one person per 10 m<sup>2</sup>. Floor-to-ceiling heights in the office are 2.8m, exceeding the British Council for Offices (BCO) advised specification for new-build offices which advise 2.6m - 2.75m floor-to-ceiling heights. The raised access floor (RAF) allows for floor box power points to be positioned freely and allowing further flexibility on office layouts.

## Height Scale and Massing

**Image: The development, viewed from Willow Walk/Crimscott Street**



81. The proposed massing has been carefully considered to minimise the impact on the local views and streetscape. The massing follows the existing building line along Willow Walk and the projected street line of the 18-19 Crimscott Street development. The building chamfers these proposed street lines to create a design that accentuates the corner and follows the historical precedents of the corner buildings in the area. Additionally, a corbelled corner further accentuates the signal corner and gives way for a more generous public realm at the ground floor.

### Draft OKR AAP

82. Policy 8 of the draft OKRAAP sets out a tall building strategy, the OKR 'Stations and Crossings' that should be adhered to in order to maximise the potential of the Old Kent Road. 'Tier One' buildings represent developments that exceed 20 storeys in height.

These developments are proposed to be sited in the vicinity of the proposed BLE stations, to mark their city wide significance and optimise the use of land in the most accessible locations. A 'Tier Two' development (between 16 and 20 storeys) will mark places of local importance to help define their character and assist wayfinding.

83. 'Tier Three' tall buildings (up to 15 storeys) will act as markers within the neighbourhood. At appropriate corners and junctions, or in relation to important land uses, they will emerge from the lower buildings that enclose the streets and open spaces. Buildings that are not defined within the three tier structure will generally be expected to be of a lower/mid-scale from 3 to 11 storeys depending on context. Typically they will form the shoulder height of podiums and/ or perimeter blocks defining streets within the masterplan or mediating the transition of scale on the edges of the masterplan. The majority of buildings at the edges of the masterplan are of a lower height to mediate the transition in scale between the masterplan proposals and existing residential communities.
84. The subject site is located towards the northern edge of the Masterplan within Sub Area 1. Due to its location, the AAP establishes this site as being outside of the tier structure. Page 116 of the AAP details the height guidance recommended within OKR 2. Buildings that front onto Crimscott are identified as having a preferred height of six to eight storeys. Given the above, the height is therefore in line within the requirements of the OKR AAP.

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



## London Plan (2021)

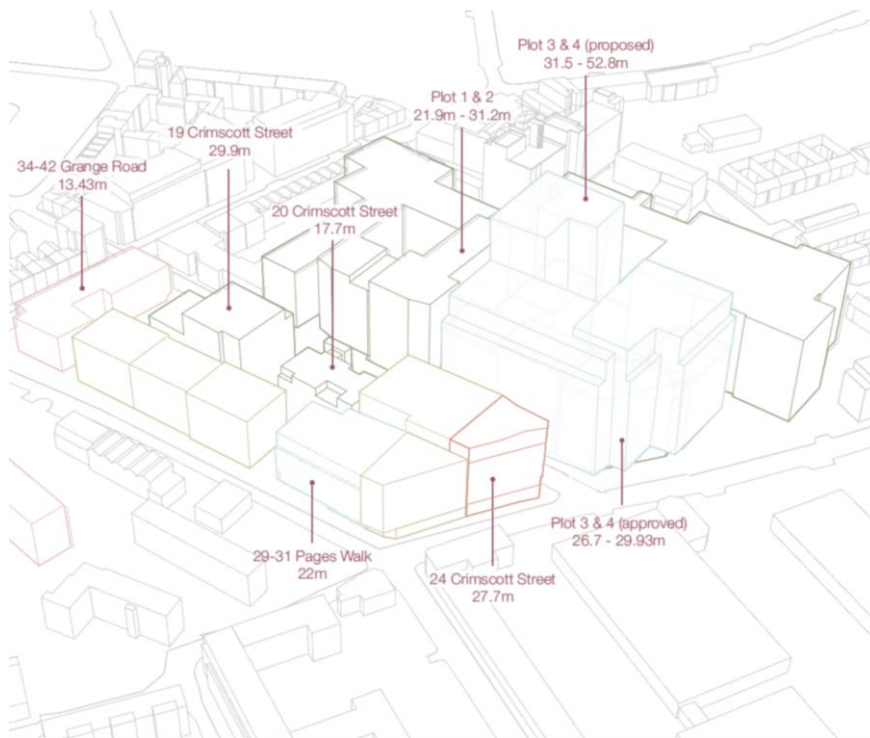
85. As the development would be substantially taller than its existing surroundings, it would be defined as a tall building in the adopted London Plan (2021). Policy D9 of the 2021 London Plan, 'Tall Buildings', states that '*Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan*'. Furthermore, London Plan Policy SD1 'Opportunity Areas' affirms the need to ensure that Opportunity Areas maximise the delivery of affordable housing and create mixed and inclusive communities. Table 2.1 of Policy SD1 identifies Old Kent Road as an Opportunity Area with an indicative capacity of 12,000 new homes, and 5,000 new jobs. As such, the Old Kent Road Opportunity Area is, in principle, an appropriate location for tall buildings which optimise housing delivery and regeneration benefits. The proposed development is considered to achieve both, whilst also meeting the other requirements of London Plan Policy D9 such as architectural quality, visual, and environmental impacts of tall buildings which are discussed in further detail below.
86. National, Regional, and Local Policy state that the impact of tall buildings in sensitive locations, including the settings of conservation areas and listed buildings should be given particular consideration. The location of the subject site is located adjacent to the Pages Walk Conservation Area, and approximately 140 metres south of the southeastern edge of the Bermondsey Street Conservation Area. The closest Grade II Listed Buildings are 44 and 45 Grange Road, located in the aforementioned Bermondsey Street CA approximately 140 metres north of the application site. The specific impact of the proposed development on this, and the wider townscape context is assessed in more detail below in the Heritage and Townscape Consideration section of this report.
87. The subject site is occupied by a two storey brick warehouse with hard-standing car parking areas to the front. The current building is sited at the intersection of Crimscott Street and Willow Walk, and has no street frontage towards Willow Walk and offers no animation at street level. It is considered that the current use of the existing building is not considered worthy of protection. The proposed high quality architectural commercial/office scheme with affordable workspace to the ground floor is a significant public benefit of the proposed development.
88. The Draft OKR AAP identifies the subject site as having a preferred typology of small industrial units. However, as discussed in principle of development in terms of land use section of this report, that given the tight constraints of the site, a commercial/office/studios development is a suitable use for this site. This highlights that for this part of OKR 2 the commercial character is enhanced, and the proposed land use reflect the prevailing character of the surrounding area. The impact of the proposed development on microclimate, overshadowing, noise, aviation, navigation and telecommunication interference is all assessed and presented elsewhere in this report. In the majority of cases however, there would be no significant adverse impacts. Please see the relevant section of this report for more detail.

## Southwark Plan

89. Southwark Plan Policy P17 refers to tall buildings, and where they should be located within the borough. The identified areas are typically within Major Town Centres, Opportunity Area Cores, Action Area Cores and the Central Activities Zone. Individual sites where taller buildings may be appropriate have been identified in the site allocations. Contained within the Southwark Plan are areas within the borough identified as site allocations; Crimscott Street and Pages Walk falls within site allocation NSP57. Given that the site is located within a Major Town Centre, is within the Old Kent Road Opportunity Area, and is identified in a site allocation, the site is considered to be a location where a tall building could be successfully integrated into.
90. To further test the suitability of the site for a tall building, Policy P17 also states that the design of buildings should be exemplary in architectural design and makes a positive contributions to wider townscape character. Developments should maximise energy efficiency and prioritise the use of sustainable materials. Finally, tall buildings should have a positive relationship with the public realm, provide opportunities for new street trees, and design lower floors to successfully relate to and create a positive pedestrian experience through widened footways and routes to accommodate increased footfall. To assess the suitability of this site as an acceptable location for a tall building, Policy P17 requires proposals to:
- Be located at a point of landmark significance; and
  - Have a height that is proportionate to the significance of the proposed location and the size of the site; and
  - Make a positive contribution to the London skyline and landscape, taking into account the cumulative effect of existing tall buildings and emerging proposals for tall buildings; and
  - Not cause a harmful impact on strategic views, as set out in the London View Management Framework, or to our Borough views; and
  - Respond positively to local character and townscape; and
  - Provide a functional public space that is appropriate to the height and size of the proposed building; and
  - Provide a new publicly accessible space at or near to the top of the building and communal facilities for users and residents where appropriate.
91. It is acknowledged that the subject site and surrounding area is devoid of any landmark features and it is anticipated that the proposal would provide an urban presence and legibility given its positioning on the corner of Crimscott Street and Willow Walk. The design of the facade addresses Crimscott Street by articulating the corner. In addition, the design successfully integrates into the constrained plot that is proportionate to the size of the site, and its height is compliant with height guidance in the AAP. The building features a setback at the ground floor to both street elevations to allow the public realm to extend. This consists of setbacks of 4.8- 5.7 and 2.4 metres respectively. At rooftop level, a communal amenity space of 50sqm is proposed for employees to use during working hours which consists of soft and hard landscaping features adjacent to a biodiverse roof.
92. The development is considered to be compatible with and respects the scale and character of the surrounding area and its setting. The scale and massing of the scheme is considered to be an appropriate addition to the Old Kent Road skyline that would integrate effectively with other tall buildings located within OKR 2.



### Image: Building heights in OKR2



### Architectural Design and Materiality

93. The OKR AAP, referring to OKR 2, details specific design guidance and recommendations for development. The guidance states that:
- ‘The design of this area will weave old and new buildings together, creating a working character and aesthetic. This will be achieved through the use of brick and metal to generate a distinctive sense of place complimented by quality landscaping proposals’.
94. The materials chosen to construct this development have been selected based on the specific history of the site. From the early 1800’s until the late 1960’s, the site housed an Iron Foundry. Subsequently, the original building was replaced with a 1970’s light industrial warehouse that is still on site today.
95. The material palette has been chosen for their industrial aesthetic, inspired by warehouse steel glazing and timber interiors. Modern methods of construction will be applied throughout and the scheme will use sustainably sourced timber to improve the embodied carbon of the superstructure. The elevation proposed for the building is comprised of five distinct architectural elements:
- A. Aluminium Curtain wall with clipped cover profiles
  - B. Glulam and steel composite frame with Cross-laminated timber (CLT) floors
  - C. Steel cross bracing
  - D. Curtain wall with Corten steel capping
  - E. Cast iron decorative cladding

**Image: Materiality palette**

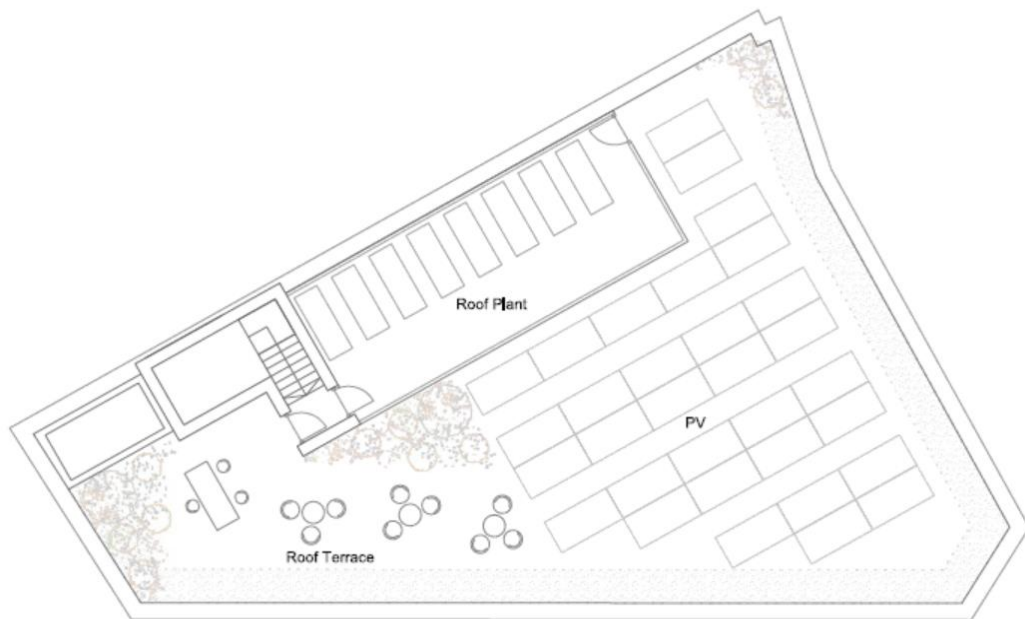


96. The design expresses the structural column rhythm, emphasising stacked tiers. The structural columns reduce in thickness towards the top to reflect the structural performance of the building. The concrete base supports the glulam structure above, and the cross-bracing acts as a transfer floor for the upper levels. The façade's design has curtain wall features with deep metal capping fins, which helps provide solar shading to the south-facing elevation. The depth of these fins means the façade would appear solid from oblique views of the building, but as you walk around the building, the façade would become more transparent, thus animating the building.
97. Similarly to other historic corner buildings around Bermondsey such as the Morocco Store and the Star and Garter Public House, both located in Bermondsey, the facade features horizontal banding. The trays are stacked on top of each other, and fold in and out to articulate the elevation facing Crimscott Street. The banding breaks up the mass of the building and accentuates the corner. The depth and detailing of these features will be critical in securing the buildings design quality and these details will be secured by condition. It is therefore considered that the proposed design is well conceived and executed in combining different material finishes effectively into the exterior finish of the development. Overall, the architecture is effective and well-articulated.

## Landscaping

98. The building is setback at the ground floor to allow the public realm to extend. The scoop created on Crimscott Street offers the opportunity to introduce street level planting and benches within the redline boundary. The rooftop terrace provides the 50sqm of communal amenity, 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.

### Image: Layout of roof terrace



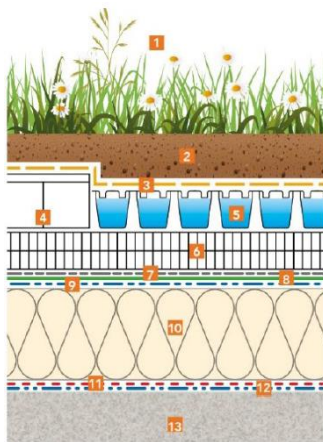
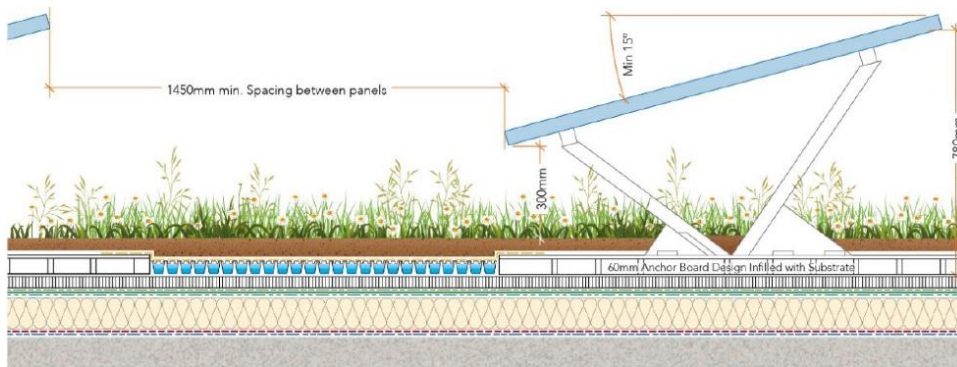
99. Policy P59 of the Southwark Plan (Green infrastructure) states that developments should provide multiple benefits for the health of people and wildlife, and to integrate with the wider green infrastructure network and townscape / landscape, increasing access for people and habitat connectivity. The Council's Ecologist has reviewed the proposal and has identified that there is biodiversity net gain from the development in the form of a biodiverse roof under the proposed photovoltaic panels. The biodiverse roof will provide an as built green roof coverage area to a minimum of 156m<sup>2</sup>, and as built substrate depth to a minimum depth of between 100 - 150mm. The biodiverse roof will consist of the following:

- UK Native British Provenance Seed Mix
- Mix percentages; 65% perennial wildflowers, 20% annuals & 15% grasses
- 49 Species:
  - 31 species of which eight are annuals
  - 8 Grasses/Sedge
  - 2 Sedum species
- 35 of the wildflowers are classed as perfect for pollinators
- 12 Butterfly and moth larval food plants
- Shade tolerant species

- Low growing to medium height
- Lengthy flowering season – April to October

100. The plant mix proposed has a high ecological value providing a long flowering period and nectar sources for a wide variety of pollinators. The mix also contains native and or naturalised sedums that will provide evergreen ground cover in sunny areas and can support specialist invertebrates. The mix has been specified to be drought tolerant with sedum species and low growing perennials. Final details of the biodiverse roof have been secured by condition along with a condition regarding the inclusion of 12 swift bricks.

### Images: Illustration of biodiverse roof proposed below PV panels



#### Key

1. Vegetation - Flora 3 Seed Mix
2. Biodiverse Substrate
3. Bauder Filter Fleece
4. Bauder BioSOLAR Anchor Board
5. DSE40 Drainage Board
6. Attenuation Cell 100
7. Bauder Protection Mat
8. Bauder Cap Sheet
9. Bauder Underlayer
10. Bauder Insulation
11. Bauder random nailed layer used on timber boarded decks only
12. Bauder Underlayer
13. Substrate

### Urban Greening Factor

101. 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).
102. The development proposes an urban greening factor (UGF) of 0.47 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.

### Image: UGF Calculations

Surface Cover Type	Factor
Intensive green roof or vegetation over the structure	0.8
Flower-rich perennial planting	0.7
Amenity grassland	0.4
Permeable paving	0.1
Standard trees planted in tree pits	0.8

Roof m <sup>2</sup>	Landscape m <sup>2</sup>	Total
155.6		155.6
9.26	8.7	17.96
		0
	50	50
	28.2	28.2

Areas

Total site area m <sup>2</sup>	353
Building footprint	292
Permeable paving	50
Green roof area	156
Bio-retention areas (Perennial planting)	18
Amenity grassland	0
Standard trees planted in tree pits	28

Factor Calculations

Building footprint	0
Permeable paving area	5
Green roof area	124.8
Bio retention areas	12.6
Amenity grassland	0
Standard trees planted in tree pits	22.4
<b>Total</b>	<b>164.8</b>

Urban Greening Factor 0.47

### Secure by Design

103. Secure by Design officers from the Metropolitan Police have reviewed the proposals and are encouraged by the design of the development. The scheme has considered opportunity for natural surveillance, incorporates excellent lines of site and the development should 'activate' this area. These are all excellent crime prevention measures. In addition, the ground floor footprint has also been designed in such a way that there are very few alcoves or secluded areas that are often crime and Anti-Social Behaviour generators. A condition is secured in the decision notice requiring the development to achieve Secured By Design accreditation.
104. In addition to the comments above, the lighting strategy proposed for the development is encouraging. The strategy proposes to provide sufficient illumination for safety and security. Lighting equipment will be carefully selected and positioned to ensure that light pollution is kept to a minimum so as not to disturb residents in neighbouring properties. External lighting will be controlled via photocell and time clock to ensure it is switched on at dusk and the majority switched off at a predetermined curfew time, leaving lighting for security overnight which will automatically be switched off at dawn. Final details of the lighting strategy have been secured by condition in the decision notice.

### Trees

105. Policy P61 of the Southwark Plan states that developments must retain and enhance the borough's trees and canopy cover, and retained trees must be protected during the construction process in line with British Standard BS5837. The policy also trees proposed as part of a scheme to be in character with the surrounding area.
106. The submitted arboricultural report is well considered and provides adequate assessment of the cost of replacement in line with Capital Asset Value for Amenity Trees (CAVAT) methodology contained within Policy P61, and with due regard to the

Tree Strategy and the NPPF Mitigation Hierarchy. One Maple Tree is to be removed, with 3 street trees proposed in its place; however, it is noted that the three street trees are outside the redline boundary of the site.

107. Parts 4.5 and 4.6 of the submitted report deal with the compensatory elements which would be required to be included within the S106 agreement. The Norway maple tree T2 is not the property of the site however, and therefore the Local Authority may request compensation in line with The Mayor London's targets regarding canopy cover within public highways. The CAVAT figure for T2 is £5,755, calculations may be found at Appendix B, the total of which would soon be balanced by the cost of planting 3 replacement trees with full tree pit specification detail. This will be specified within the s.278 section of the s.106 agreement.
108. Section 4.6 of the report demonstrates that within 10 years, the value of 3 semi mature trees in good health would be significantly greater than the existing. Calculations based on a 25cm stem diameter tree (approximate size after 10 years growth) in good condition, within the same location and with 20 - 40 years useful life expectancy is £12,771. Combining all three trees would give a total of £38,313 for off-site planting which is to be secured in the S106 Agreement.
109. The Council's Urban Forester has reviewed the submitted documentation and raises no objection to the development subject to the above contribution to off-site tree planting being secured in the S106 Agreement, and conditions attached to the decision notice. The conditions recommended are in regards to a compliance condition relating to the submitted arboricultural report, and a pre-commencement condition regarding a tree survey to be undertaken.

## **HERITAGE AND TOWNSCAPE CONSIDERATIONS**

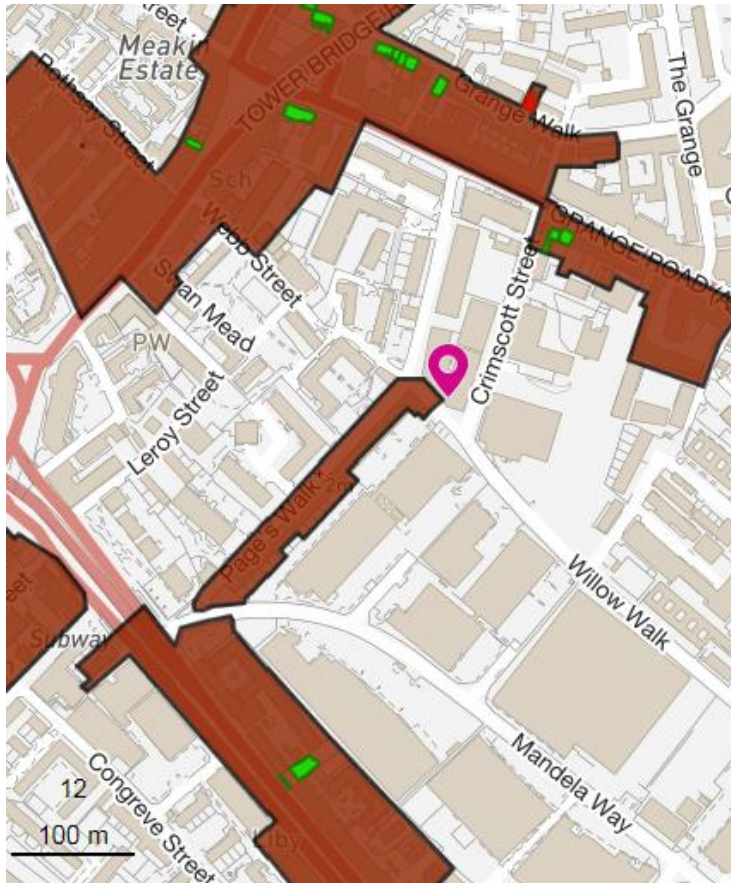
110. Policy HC1 of the London Plan 2021 advises that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural detail. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 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**

111. 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 140 metres south of the southeast

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. These are two Grade II Listed Buildings located at nos. 44 and 45 (and attached railings to steps) Grange Road.

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



### Draft OKR APP and Draft Local List

112. 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

### **Townscape and Visual Impact Assessment (TVIA)**

113. As part of the submitted TVIA document, 8 viewpoints have been produced to determine the developments potential 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 includes views from the edge of both conservation areas. The submitted images and views show that the reduction in height to 8 storeys reduces the amount of built form that is visible from the Pages Walk Conservation Area, and the Bermondsey Street Conservation Area.

### Viewpoint 1 – Grange Road looking southbound

#### Image: Existing and Proposed Views



114. The image above illustrates how the scheme will be viewed from the south end of Crimscott Street, which is the location of the southern edge of the Bermondsey Street Conservation Area. The view is largely urban and modern with medium rise flat blocks framing each side of Crimscott Street. The revised massing reduce the amount of new built development in the view with the eastern elevation addressing Crimscott Street. From this viewpoint, the proposals will sit comfortably within the surrounding context reflecting the buildings on the left and right hand side of the view.

### Viewpoint 2 – Bermondsey Spa and Gardens looking southbound

#### Image: Existing and Proposed Views



115. The viewpoint illustration above demonstrates views of the development will be obscured from view by the existing development which wraps around the boundary of the garden and will not be visible when viewed from Bermondsey Spa Gardens.



### Viewpoint 3 – Willow Walk looking northwest

#### Image: Existing and Proposed Views

Existing



Proposed



116. This viewpoint illustrates the modern and urban grain of the immediate area, with medium to large scale development lining the north side of Willow Walk. The reduced height of the development will help to identify the edge of the OKROA. The scheme will be visible in the mid-point of the view given its location on the corner of Willow Walk and Crimscott Street.

### Viewpoint 4 – Pages Walk – eastern pavement looking northeast

#### Image: Existing and Proposed Views

Existing



Proposed



117. The above viewpoint illustration demonstrates that the scheme will not be visible from this viewpoint. The reduction in height of the building to 8 storeys, will ensure that the proposals will continue to be obscured by interposing built development and will continue to not affect this viewpoint.

### Viewpoint 5 – Pages Walk – western pavement looking northeast

#### Image: Existing and Proposed Views

Existing



Proposed



118. The illustration above for this viewpoint provides an identical outcome to the viewpoint 4 assessment. The reduction in height of the development would limit views of the development from the public realm.

### Viewpoint 6 – Guinness Square Building looking northeast

#### Image: Existing and Proposed Views

Existing



Proposed



119. This viewpoint is taken from a single lane road which branches off Pages Walk. The proposed development is visible above the roof line of the 1-8 The Willows, and is also seen adjacent to 43-73 Pages Walk. The proposals will be seen in front of the Rich Estate earliest phase of development and above the warehouse range on the left hand side of the view.

## Viewpoint 7 – Intersection of Swan Mead/Webb Street looking southeast

### Image: Existing and Proposed Views

Existing



Proposed



120. This viewpoint demonstrates the degree of visibility of the development from the junction of Swan Mead/ Webb Street. The scheme will be seen in the context of the modern 20th century flat blocks which line each side of Swan Mead. The development will be seen behind the mature landscaping and visible, albeit at a distance, within the context of No. 70 Pages Walk and Pages Walk Conservation Area.

## Viewpoint 8 – Northern end of Pages Walk looking south

### Image: Existing and Proposed Views

Existing



Proposed



121. From this viewpoint, the north elevation of the proposed development will be visible within the middle-ground of the view. The scale of the proposed development has been reduced in accordance with the massing ambitions for the subject site in the 2020 version of the OKR AAP. This enables the scheme to correspond with the existing modern flat blocks within Bermondsey Conservation Area. From this location, the reduction in height of the proposals will limit the amount of the development that is visible and is considered to be wholly appropriate to this context.

## London View Management Framework

**Image: Existing and Proposed Views***Existing**Proposed*

122. Given the distance of the viewpoint, circa 10.5 kilometres north of the subject site, and taking into consideration the reduced massing to 8 storeys, the development would not be visible from this location and would therefore preserve this viewing corridor of the London skyline.
123. The height of the development is 27.7m AOD. As the subject site is not located close to any heritage asset, and sits significantly below the thresholds heights considered within the Greater London's Authority's London View Management Framework. Additionally, given the height and location of the development away from listed buildings, and Locally Protected Southwark Views, the development is not considered to affect any heritage assets or views in the wider area.

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

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

**Table: Impact on heritage significance**

<b>Listed Buildings and Conservation Areas</b>	<b>Assessment of Impact on heritage significance</b>
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 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.
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125. In conclusion, the proposed development would not harm the views assessed, the proposed development would be visible; however, this is identified as causing no harm due to the substantial distance to nearby listed building assets. Taking into consideration the height of the development, the scheme is considered to be a beneficial addition to the London Skyline that would successfully integrate into the immediate area and would not cause harm to any of the heritage assets listed above.
126. Whilst limited weight has been given to emerging OKR AAP policy, full weight has been given to adopted policies, including the NPPF (2021), London Plan (2021) and Southwark Plan (2022). As can be seen from the assessment contained within this report, the proposals are considered to be in compliance with these adopted policies.

## **IMPACT OF PROPOSED DEVELOPMENT ON AMENITY OF ADJOINING OCCUPIERS AND SURROUNDNG AREA**

127. 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**

128. 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**

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

#### **BRE Daylight Tests**

130. Guidance relating to developments and their potential effects on daylight, sunlight, and overshadowing is given within the 'Building Research Establishment (BRE) Report 209 Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice 2nd Edition (2011)' (BRE, 2011) and also in 'Lighting for Buildings Code of practice for daylighting (AMD 7391) BS 8206-2:1992' (BSI, 2008). The Building Research Establishment's

(BRE) Site Layout Planning for Daylight and Sunlight, a guide to good practice (1) gives criteria and methods that are explained subsequently for calculating DSO effects on surrounding receptors as a result of the proposed development.

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

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

132. 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.
133. 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.
134. 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

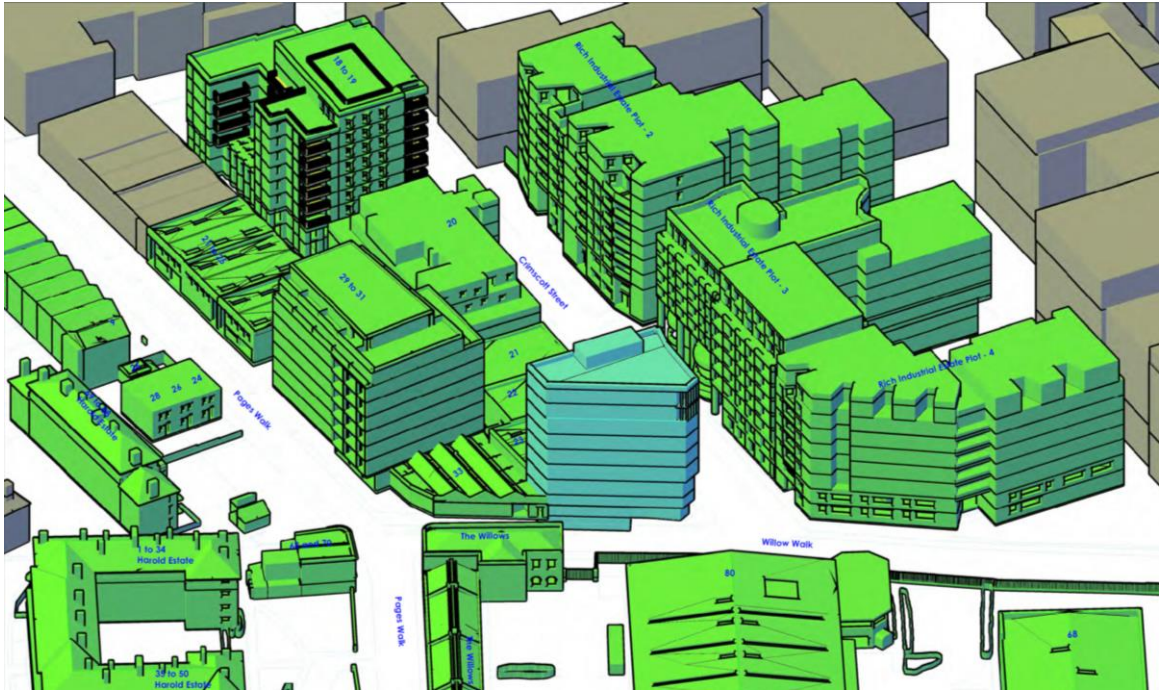
135. When assessing sunlight, the BRE recommends that the Annual Probable Sunlight Hours (APSH) received at a given window in the proposed case should be at least 25% of the total available, including at least 5% in winter. Where the proposed values fall short of these, and the absolute loss is greater 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

136. 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.'
137. The closest properties to the development consist of a mix of residential and commercial buildings. These properties are:
- 18 to 19 Crimscott Street,
  - 20 Crimscott Street
  - 22 Crimscott Street
  - 23 Crimscott Street
  - Rich Industrial Estate – Plot 2
  - Rich Industrial Estate – Plot 3
  - Rich Industrial Estate – Plot 4
  - 1 to 34 Harold Estate
  - 35 to 50 Harold Estate
  - 69 to 88 Harold Estate
  - 9 Pages Walk
  - 21 to 25 Pages Walk
  - 24, 26, 28 Pages Walk
  - 29 to 31 Pages Walk
  - 33 Pages Walk
  - 68 and 70 Pages Walk
  - The Willows
  - 68 Willow Walk
  - 80 Willow Walk

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



Daylight/sunlight/overshadowing impacts:

138. The Willows, 68 Willow Walk, 80 Willow Walk, 29 to 31 Pages Walk, 33 Pages Walk, 68 and 70 Pages Walk, and 20, 22, and 23 Crimscott Street are used commercially as offices and as such would not fall under the BRE definition for testing of main habitable room windows. All other properties in the above list are in residential use and do have a requirement for daylight. The following paragraphs provides an analysis of the results contained within the submitted Daylight and sunlight assessment.
139. The properties of 35 to 50 Harold Estate, 18 to 19 Crimscott Street (Residential upper floors), and 9, 24, 26, and 28 Pages Walk are fully compliant with the VSC tests, have satisfactory levels of sunlight amenity will be experienced to all main habitable living rooms in accordance with the ASPH tests. Finally, each property will have very good levels of daylight, compliant with the DD methodology. The assessment below will therefore focus on affected properties.

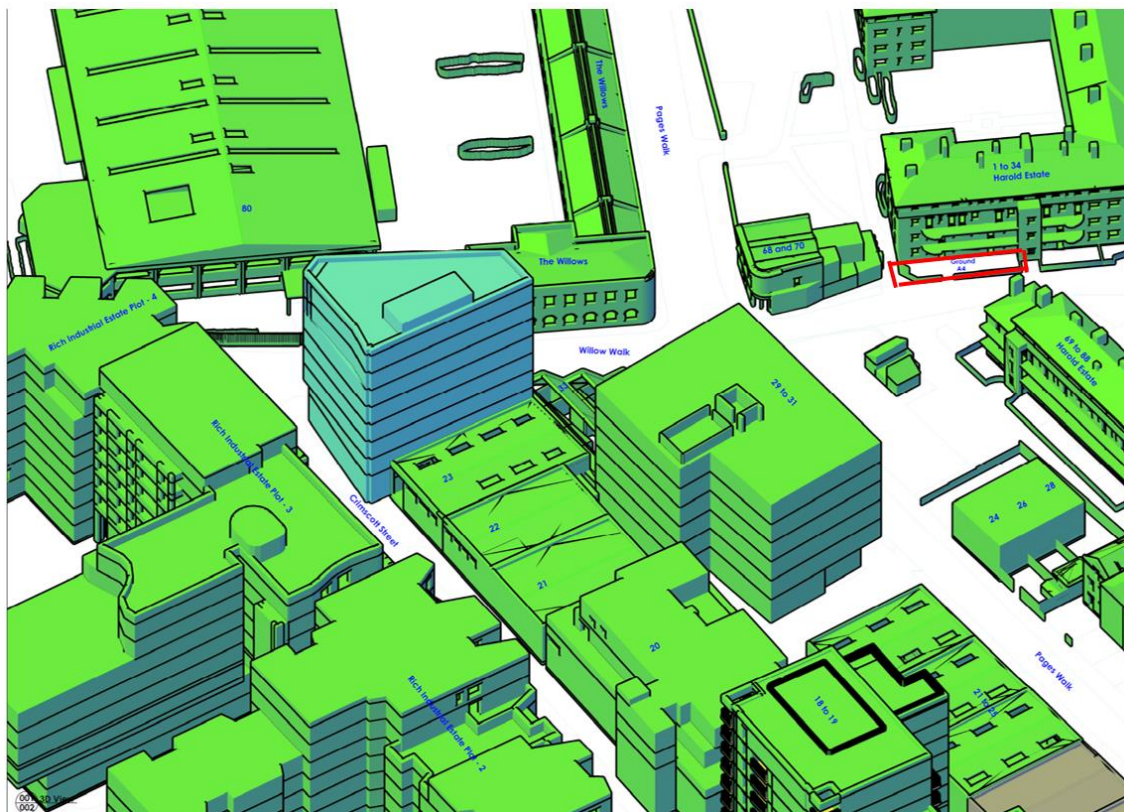
1 to 34 Harold Estate:

140. The results of the VSC test demonstrate that all windows meet or surpass the BRE recommendations, and very good levels of Daylight should be received by all windows. The results of the ASPH test confirm that adequate levels of sunlight amenity will be experienced to all main habitable living rooms in every instance following the construction of the development. The results from the DD test show that adequate levels of distribution remain and all rooms meet the guidelines in every instance. Very good levels of daylight will therefore be received within this property following the construction of the proposed development.



141. Regarding overshadowing to gardens and open spaces, the test undertaken shows that 5 out of 6 amenity spaces tested at this property will fully comply with the BRE suggested target values. The only amenity which falls short of its target is the ground floor amenity A4 that is already compromised in a baseline scenario by the North orientation within the building.

**Image: Amenity A4 highlighted in red within context of development**



69 to 88 Harold Estate:

142. The results of the VSC test show that all windows meet or surpass the BRE recommendations, and very good levels of Daylight should be received by all windows. The APSH results confirm that adequate levels of sunlight amenity will be experienced to all main habitable living rooms in every instance following the construction of the development. The DD Test demonstrates that adequate levels of daylight distribution remain in all but two rooms. However, these two rooms are stair treads and as non-habitable rooms, they do not need to be considered for the assessment. Therefore, very good levels of daylight will be received within the relevant habitable rooms following the construction of the proposed development. All amenity spaces tested fully comply with the BRE target values.

Rich Industrial Estate – Plot 2:

143. The results of the VSC test demonstrate that upon initial inspection all windows meet or surpass the BRE recommendations with the exception of one window, W8 on the mezzanine floor. This window serves non-habitable areas of this property and as such does not require any further consideration. This means that all relevant habitable room

windows meet the BRE recommendations regarding the VSC test. APSH results confirm that adequate levels of sunlight amenity will be experienced to all relevant living rooms in every instance following the construction of the development.

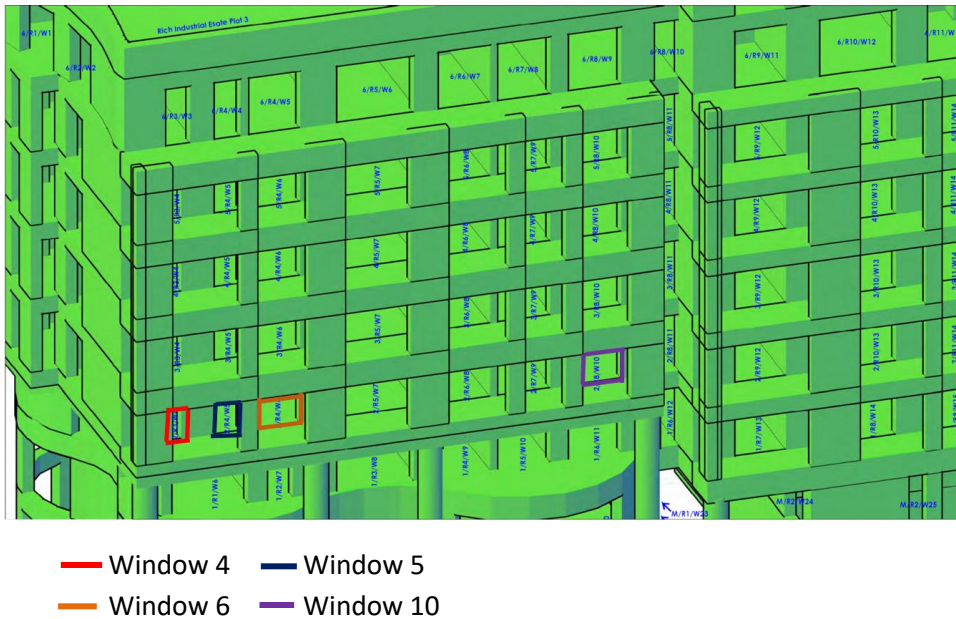
144. DD tests undertaken shows that satisfactory levels of distribution remain in all rooms, with the exception of 8 rooms on the ground floor (R20 – 28). It should be noted that all of these rooms are non-habitable in use and accordingly do not warrant any further consideration. It is therefore considered that good levels of daylight will be received within this property following the construction of the proposed development. The results of the overshadowing to gardens and open spaces shows that there are no nearby gardens or amenity areas directly to the North of the development located at this property. The proposed development will therefore not create any new areas which receive less than two hours of sunlight on 21st March. The proposed development satisfies the BRE overshadowing to gardens and open spaces requirements.

#### Rich Industrial Estate – Plot 3:

145. The results of the VSC test show that upon initial inspection 112 out of 179 windows meet or surpass the BRE recommendations. Out of 67 windows that fall short of their recommended target values 10 are located on the ground floor, 9 on the mezzanine, 11 on the first, 12 on the second, 12 on the third, 7 on the fourth floor and 6 on the fifth floor. All of the windows that fall short of their targets on the ground and mezzanine floors (19 in total) serve non-habitable areas within the property and as such do not require any further consideration.
146. Of the 11 windows falling short of their recommendations on the first floor, there are a number of windows to be mitigated:
- It should be noted that window 6 is one of 6 windows serving this room. Additionally, this window achieves a result of 0.78 against a target of 0.8. It is considered that this result is marginal and acceptable given the location.
  - Window 11 is also one of two windows serving room 6; consideration should be given to the fact that this room achieves a DD result of 0.99. This means that whilst window 11 is not fully compliant, the room itself remains well lit.
  - Of the remaining 9 windows, 7 serve bedrooms, which are deemed to be less important than other room types as per the BRE guide as they are mainly occupied at night time.
147. Of the 12 windows falling short of their recommendations on the second floor, there are a number of windows to be mitigated:
- Window 4 achieves a result of 0.73 against a target of 0.8, It is considered that this is a marginal loss, and reasonable given the dense urban context of the surrounding area
  - Window 5 is the secondary window to room 4, with window 6 being the main window to the room (which meets the BRE recommendations). Moreover, both windows are compromised in the baseline condition and any increase of the mass on the development site is likely to cause a disproportionate percentage of loss despite a relatively small reduction in the overall value.

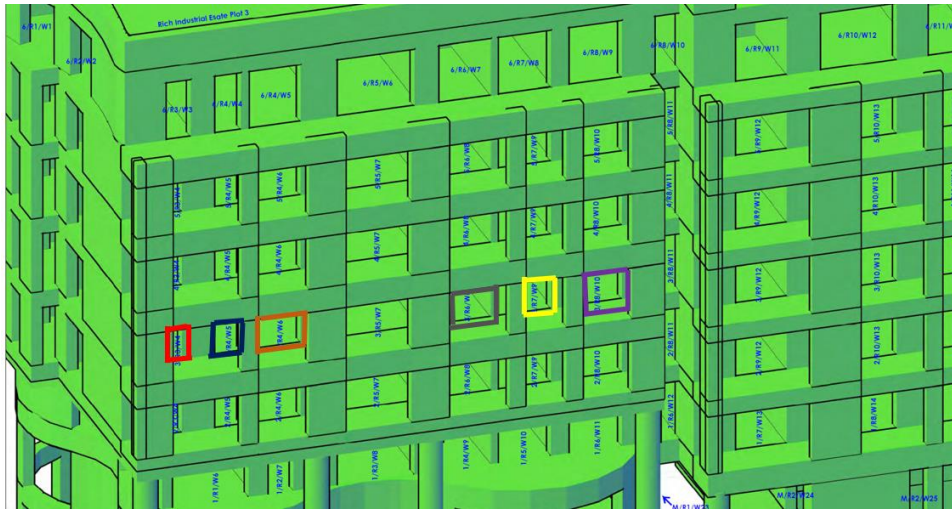
- Window 10 achieves a result of 0.74 against a target of 0.8, this is considered to be marginal and reasonable given the context. In addition, this window is one of two serving room 8, consideration should be given to the fact that this room achieves a DD result of 0.97. This means that whilst window 10 is not fully compliant, that the room itself remains well lit.
- Of the 8 remaining windows, 6 serve bedrooms, which are deemed to be less important than other room types as per the BRE guide as they are mainly occupied at night time.

### Image: Potentially affected windows – Second floor plot 3



148. Of the 12 windows falling short of their recommendations on the third floor, there are a number of windows to be mitigated:
- Windows 4, 5, 8, 9 & 10 all achieve a result considered to be marginal given the context of the area (0.78, 0.76, 0.77, 0.76, 0.78 respectively).
  - Window 5 is the secondary window to room 4, with window 6 being the main window to the room (which meets the BRE recommendations). As on the floor below, due to the low existing values any increase of the mass on the development site is likely to cause a disproportionate percentage of loss despite a relatively small reduction in the overall value
  - Of the 7 remaining windows, 5 serve bedrooms, which are deemed to be less important than other room types as per the BRE guide.

### Image: Potentially affected windows – Third floor plot 3



- |  |  |   |
|--|--|---|
| <span style="color: red;">■</span> Window 4  | <span style="color: blue;">■</span> Window 5   | <span style="color: orange;">■</span> Window 6  |
| <span style="color: grey;">■</span> Window 8 | <span style="color: yellow;">■</span> Window 9 | <span style="color: purple;">■</span> Window 10 |

149. Of the 7 windows falling short of their recommendations on the fourth floor, there are a number of windows to be mitigated:
- Window 18 achieves a result of 0.74 against a target of 0.8. This result is considered to be marginal and acceptable given the location.
  - Of the 6 remaining windows, 4 serve bedrooms, which are deemed to be less important than other room types as per the BRE guide.
150. Of the 6 windows falling short of their recommendations on the fifth floor, there are a number of windows to be mitigated:
- Window 12 achieves a result of 0.79 against a target of 0.8. This result is considered to be marginal and acceptable given the location.
  - Of the 5 remaining windows, 2 serve bedrooms, which are deemed to be less important than other room types as per the BRE guide.
151. The above results demonstrate that, whilst a number of windows fall short of their requirements upon initial inspection, a good portion of these can be mitigated meaning that the impact on this property under the VSC test are considered acceptable.
152. APSH results indicate that adequate levels of sunlight amenity will be experienced to all main habitable living rooms in every instance following the construction of the development. The results of the DD test demonstrates satisfactory levels of distribution remain to all rooms, with the exception of 18 of the 107 rooms tested. It should be noted that 8 of these rooms (located on the mezzanine floor) are non-habitable in use and do not warrant further consideration. Of the remaining 10 rooms, 5 are bedrooms; these are not considered to be as important as per the BRE guide as they are mainly occupied at night time.

153. In terms of the overshadowing test, the proposed development will not create any new areas which receive less than two hours of sunlight on 21st March at this property. The before/after ratio is 1 (no loss) and the proposed development therefore passes the BRE overshadowing to gardens and open spaces test at the Rich Industrial Estate plot 3.

Rich Industrial Estate – Plot 4:

154. The results of the VSC test show that upon initial inspection 43 out of 52 windows meet or surpass the BRE recommendations. 9 windows that fall short of their recommended target values, 3 are located on the ground floor, 1 on the mezzanine, 2 on the first, 1 on the second, 1 on the third, and 1 on the fourth floor. It should be noted that 5 of these windows serve non-habitable rooms and therefore do not require any further consideration. This leaves four windows remaining that fall marginally short of the BRE recommendations.
155. The APSH results demonstrate that satisfactory levels of sunlight amenity will be experienced to all main habitable living rooms in every instance following the construction of the development. Results of the DD test indicate that very good levels of daylight distribution remain and all rooms meet the guidelines in every instance. Very good levels of daylight will therefore be received within this property following the construction of the proposed development. Regarding overshadowing, there are no nearby gardens or amenity areas directly to the North of the development located at this property. The proposed development will therefore not create any new areas which receive less than two hours of sunlight on 21st March. The proposed development satisfies the BRE overshadowing to gardens and open spaces requirements.

Daylight and sunlight conclusions:

156. Overall, the results of the BRE methodologies (VSC, DD, APSH & Overshadowing) show a small number of areas of non-compliance to neighbouring occupiers. The VSC tests have shown that 97 of the 1153 windows tested (around 8%) fall short of their targets on initial inspection. It should be noted that 65 of these windows serve non-habitable spaces and therefore do not require any further consideration. 12 of the remaining windows achieve a result close enough to the recommended target that is considered to be marginal and acceptable given the urban context of the location. 1 window is the main window to the room; however, this room is also served by another fully compliant window and therefore is sufficiently mitigated. This leaves only 20 out of the 1153 windows tested falling short of their recommendations. This is a compliance rate of around 98%, and is considered to be extremely high given the nature of the surrounding built environment.
157. Results of the APSH tests confirms that all relevant habitable room windows serving living rooms meet the BRE recommendations. DD tests undertaken demonstrate that with the exception of 30 rooms (4.5%) all other 630 neighbouring rooms meet the BRE upon initial inspection. It should be noted that 16 of these rooms are of non-habitable use and therefore do not require further consideration. A further 2 rooms achieve a result close enough to its recommendation and is therefore considered to be marginal and reasonable given the context of the surrounding area. This leaves only 12 rooms

falling short of their targets out of the 660 rooms tested. This is a compliance rate of around 98.5%, and is considered to be extremely high.

158. The results of the Overshadowing to Gardens and Open Spaces test has shown that only 1 of the 33 outdoor amenity spaces tested falls short of the BRE recommendations. This is a compliance rate of around 97%, and is considered to be extremely high given the locality. It should be noted that the amenity space that falls short of the recommendation is a small front garden belonging to the ground floor flat at 1 to 34 Harold Estate.

## **Overlooking of Neighbouring Properties**

159. In order to prevent harmful overlooking, the Residential Design Standards SPD requires proposed developments to achieve a distance of 12m between the front elevations of buildings and/or across a highway, and a minimum of 21m between rear elevations.
160. The subject site sits on the corner of Crimscott Street and Willow Walk. Given that the property to the rear, 33 Pages Walk, is in commercial use, the 21m minimum distance is not applicable. Plot 3 of the Rich Estate development currently under construction is located adjacent to the subject site, and upon completion, will be in residential use on the upper floors. As both the subject development and the Plot 3 Rich Estate building will be setback, the minimum distance between the front elevations will be circa 18m. This distance exceeds the minimum separation distance of 12 metres as set out in Southwark's SPD.

## **TRANSPORT CONSIDERATIONS**

161. 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.
162. 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.
163. Southwark have recently adopted their Movement Plan, a people, place and experience approach to transport planning rather than a modal one. This application has been assessed on how it will contribute to the 9 Missions.
164. 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

165. The submitted Transport Assessment (TA) is considered to provide an adequate appraisal of the relevant transport and highway related matters including an assessment of the potential for journeys to be made by sustainable modes of transport as well as detailed estimates of vehicular trips resulting from the development.
166. Officers have reviewed this application and identified the following areas for detailed comments:
- Access and Road Safety – The safe movement of all modes entering and exiting the public highway
  - Trip Generation – The existing and proposed trips related to the site
  - Servicing and Delivery – How the development will manage the vehicular trips required
  - Car Parking - How the development will manage the vehicular trips required
  - Public Transport – Current access and future potential
  - Active Transport – Walking and cycling and behaviour change

### Proposed Site Layout

167. The proposed future site layout will improve the pedestrian movement by wider footways on both Willow Walk and Crimscott Street. The existing dropped kerb vehicle access on Willow Walk will be stopped up as part of the proposals while the existing dropped kerb vehicle access on Crimscott Street will be extended to the south / converted to provide a loading / servicing bay for the development. Vehicle access to the neighbouring unit at No.23 Crimscott Street will not be affected by the proposal. The loading / servicing bay proposed on Crimscott Street that has a minimum width of 2.0m. The loading / servicing bay has been designed for the use of delivery vans akin to a 7.5t panel van and will also allow refuse collection vehicles to pull in so as not to block flow the through flow of traffic along Crimscott Street.
168. Consideration of loading bays will be detailed up as part of the S278 Agreement, All works within the extent of the S278 for Southwark will be done in accordance with Southwark Street Design Manual (SSDM) and TfL's Healthy Streets design guidance. A condition requirement for the detailed design of the landscaping and public realm will ensure secure by design and road safety is fully considered.

### **Trip Generation**

169. The existing site is a two storey building with hardstanding area that is used for car parking. However, there is very little traffic arriving at and departing during the AM and PM peak hours. The proposed development is estimated to generate the following daily trips:

## Motorised Vehicular Trips

*Non residential* 4

### Servicing and Delivery

170. The refuse collection will happen from Crimscott Street and the bin stores are located within 10 metres of the kerb
171. In order to ensure that on-street servicing and deliveries do not negatively impact on the highway network, the Council is recommending that applicants in the Old Kent Road Opportunity Area enter into Delivery Service Plan Bonds against their baseline figures for all daily servicing and delivery trips. 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 has been secured through the S106 Agreement.
172. The Class E use proposed in the development will be subject to a condition on the marketing and promotional material related to the work to ensure this is explicit in how the development has been designed to discourage private cars and encourage sustainable working and visiting.

### Car Parking

173. Car parking facilities in the area around the site are limited due to controlled parking regulations which operate in the area. The site is located within the London Borough of Southwark's (GR) Controlled Parking Zone where regulations apply from Monday to Friday from 08:00 to 18:30. The existing site has hardstanding areas on which vehicles use as parking spaces.
174. A S106 obligation that prevents future office tenants of the proposed development from obtaining resident parking permits for any future CPZ. Discussions at pre-application stage about the use of the loading bay as a disabled parking space out of office hours was seen as a positive outcome. Therefore it is proposed that a new loading bay / servicing bay on Crimscott Street is to be used as a disabled parking bay during periods when the office is closed such as the weekends.

### Public Transport

175. The site is within a 20 minute walking distance of the London Bridge Station that services both underground, and National Rail services. The subject site is conveniently located between four bus routes, the 1, 188, 42, and 78 bus services. 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. However, in this instance, given that the development is non-residential, and that evidence submitted shows that peak bus use



would be likely to grow by 2 trips in peak hours. It is therefore not significant and a bus contribution would not be necessary for this site.

## **Active Transport**

### Walking and public realm

176. The application provides for wider footways, and this will be delivered through the S278 Agreement. The development is also considered to improve the pedestrian experience when moving past and visiting the site from Willow Walk and Crimscott Street.

### Cycling

177. 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 50 secure cycle parking spaces are proposed comprising of 38 long stay cycle spaces, and 12 short stay spaces. 38 cycle parking spaces by means of two-tier racks are to be located securely on the ground floor of the development. Externally 5 Sheffield stands (10 spaces at 1.0m spacing), and 1 Sheffield Stand (2 spaces at wide spacing 1.8m) are proposed adjacent to the existing street tree. This provision of cycle parking meets the requirements of the London Plan 2021 and the Southwark Plan 2022. A condition is attached to this decision required detailed design of the cycling parking provision. The S106 Agreement will include a contribution towards the delivery of a new Cycle Hire Docking station of £5,000.

## **Construction**

178. A Draft Construction Logistics Plan has been prepared as a standalone document submitted along with this application. The S106 Agreement would secure detailed Demolition Environmental Management Plan (DEMP) and a Construction and Environmental Management Plan (CEMP). This is to enable the Council to manage cumulative impacts on the highways and environment.

### Conclusion on Transport

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

## **ARCHAEOLOGY**

180. 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.

181. 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. The applicants have submitted a Desk Based Assessment (DBA) that adequately summarises the archaeological potential of the site. The recommendations in this document include an archaeological evaluation, subsequent mitigation works and a geoarchaeological study. The archaeological evaluation and the archaeological monitoring of site investigation works will inform subsequent archaeological mitigation works. These points have been secured by condition in the decision notice.

## **AVIATION**

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

## **ENVIRONMENTAL CONSIDERATIONS**

### **Wind and Microclimate**

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

### **Fire strategy**

184. 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.
185. The 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. 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.

## **Flood Risk and Water Resources**

186. 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.
187. The Environment Agency (EA) has reviewed the submitted information in relation to flood risk and has no objection to the proposed development. On the advice of the EA, recommendations attached to this decision should include informatives relating to Piling and a Sustainable Urban Drainages (SuDS), and investigative boreholes.
188. 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.
189. A Flood Risk Assessment (FRA) has been undertaken to assess flood risk to and from the development site. Despite the low likelihood of flooding, the FRA proposes a number of mitigation measures, including the use of flood resistant materials and designs and specific groundwater measures. These mitigation measures have been factored into the design considerations of the scheme. The Council's Flood Risk Officer raised no objections to the information provided within the FRA; however, did request more information in relation to SuDS.
190. The applicant submitted a revised SuDS note on 10.01.2022. The revised document addresses the initial concerns raised. This included details of a maintenance schedule, frequency, and whom will be the responsible party. Information that demonstrates exceedance flow routes will be transferred off-site due to topographical differences; and, a runoff calculation compensation to reach greenfield rates.
191. Flood Risk Officers have reviewed the revised document and recommend a drainage verification report to be conditioned. Additionally, the shortfall of calculation compensation amount to reach greenfield runoff rates is £7,027.20, and this has been secured in the S106 Agreement.

## **Ground Conditions and Contamination**

192. EPT officers have reviewed the phase 1 GeoSmart report dated August 2021. The desktop study concluded that there was a low likelihood of contamination on site. However, the site was used for industrial uses previously and EPT does not concur with this interpretation concluded from the report. Notwithstanding this, a Phase 1 site

investigation condition has been attached to this decision. If this report were to reveal possible presence of contamination on or beneath the site or controlled waters, then, prior to the commencement of development works, an intrusive site investigation and associated risk assessment would need to be completed to fully characterise the nature and extent of any contamination of soils and ground water on the site.

193. The Environment Agency have reviewed the proposals in relation to contaminated land and raise no objection to the proposed development.

### **Piling**

194. Thames Water have responded to a consultation request on this development. Given that the development is located within 15 metres of a strategic sewer. Therefore Thames Water requests that a piling condition be attached to this decision given that piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. The recommended condition wording has been attached to this decision.

### **Air Quality**

195. The subject site is located in the Southwark Air Quality Management Area which is designated for the potential exceedance of the annual mean nitrogen dioxide (NO<sub>2</sub>) and daily mean PM<sub>10</sub> air quality objectives. Southwark Plan Policy P65 'Improving air quality', states that development should address the impacts of poor air quality on building occupiers and public realm users by reducing exposure to and mitigating the effects of poor air quality. An Air Quality Assessment (AQA) has been submitted with the application, which considers the air quality impacts arising from the construction and operational use of the development, taking into account all relevant local and national guidance and regulations.
196. The AQA advises that with regards to sensitive receptors, locations where people or wildlife may be adversely affected by changes in air quality or dust soiling are considered as relevant receptors for air quality. Receptors introduced by the proposed development are also relevant. 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 200m of the development site have therefore been scoped out of the assessment.
197. The AQA concludes that the NO<sub>2</sub> and PM<sub>10</sub> AQOs are currently being met at the development site and are expected to continue to be met. Based on the findings of the report EPT officers will not recommend any mitigation methods for the premises and its uses. However, the air quality control will be managed during the construction phase by implementing an effective environmental construction management plan.

### **Noise and Vibration**

198. EPT officers have reviewed the noise assessment from Southdowns environmental consultants ref 2373w- SEC-00004-01 dated 17 August 2021. The assessment established the baseline noise level that will inform the development phase and noise levels. Suitable acoustic treatments shall be used to ensure compliance with the above standard. In addition, a condition is imposed in the decision notice for Background, Rating and Specific Sound levels to be calculated fully in accordance with the methodology of BS4142:2014+A1:2019.

### **Agent of change**

199. 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.
200. As previously mentioned in this report, the closest residential receptor will be plot 3 within the Rich Industrial Estate, located adjacent to the development when construction is completed. The methodology recommended in the noise section of this report above is required to be undertaken when assessing and mitigating any potential impacts on plot 3, and existing commercial occupiers neighbouring the site.
201. 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**

202. 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.
203. 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.

204. An Energy Assessment and Sustainability Strategy based on the Mayor's hierarchy has been submitted by the applicant. This details how the targets for carbon dioxide emissions reduction are to be met. A combination of 'Be Lean' 'Be Clean' and 'Be Green' measures have been employed in an attempt to achieve the reduction in line with the GLA guidance on preparing energy statements, P70 of the Southwark Plan 2022, and the Southwark Sustainable Design and Construction SPD.

#### Be Lean (use less energy)

205. The development achieves a 19% reduction in overall carbon emissions over Part L 2013, through passive design and energy efficiency measures alone. The reduction will be achieved by a combination of measures, which include; significantly improved fabric 'U' values, improved air tightness, minimising cold bridging, and incorporation of Air Source Heat Pumps (ASHP) for heating and cooling within the commercial units. Dedicated low energy fittings are proposed for efficient lighting within the scheme. The lighting will be designed to ensure that a level of efficiency of 110 lamp lumens per circuit-Watt is achieved. All lighting controls will be daylighting dimming and absence detection to office/co-working spaces and meeting rooms.

#### Be Clean (supply energy efficiently)

206. The subject site is located 355m from an existing/proposed heating network according to the London heat map network. Further investigation will need to be undertaken to establish if the scheme can connect to any of networks, including the proposed District Heating Network (DHN). In the event that a DHN heat supply connection can be obtained initial predictions are that a considerable reduction in carbon emissions will be achieved.
207. The site therefore proposes to provide spatial provision and plant for its own local building only heat network in accordance with the proposed strategy. In the event that the development is able to access a heat connection from new/existing routes, the site proposes to install a manhole outside the plantroom for future district heating pipework, which will be capped off and install the district heating infrastructure from this point into the new plantroom where the heat plate exchanger will be located. The plantroom will allow for suitable space for the required equipment that complies with relevant Guidelines documents for connecting to heat networks.

#### Be Green (Low or Carbon Zero Energy)

208. ASHP's and Photovoltaic (PV) Panels are the green/renewable energy technologies have been considered suitable for the proposed development. ASHP's can be connected in series and thus provide a heating/cooling system, modules only work as and when demand requires thus providing excellent efficiencies. The proposed retail VRF system will have a heating SCoP of 4.37 and Cooling SEER of 4.5. Regarding PV Panels, it will be provided with approximately 8.7kWp of photovoltaics located on the roof, adjacent to the communal roof terrace. The panels will be South facing, and at a 30-degree tilt. 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.

209. Taking into consideration the measures assessed in this section of the report, the development exceeds the minimum 35% improvement over Part L Building Regulations, achieving on site reductions of 52%. As noted above, if the development can connect to the DHN, the savings figure of 52% will substantially increase additional savings. 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 10.46 tonnes CO<sub>2</sub> per annum amounts to £29,811. 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**

210. London Plan Policy SI4 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).

211. The facade has been designed to respond to environmental factors like sunlight and prevailing winds. The South facade is articulated with deep fins that helps with solar shading and reduces overheating. The buildings corner position is favourable for cross ventilation, and given that the design of the facade incorporates openable windows, this allows for the building to be passively cross-ventilated. Additionally, as ASPH's are proposed, the benefits of this enables the development to provide active heating/cooling throughout.

### **Whole life cycle and carbon capture**

212. London Plan Policy SI 2 (Minimising greenhouse gas emissions) part F states that *"Development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions"*. Given that this development is not referable to the Mayor of London, a whole life-cycle carbon emissions assessment is not required.

### **Circular economy statement**

213. London Plan Policy SI 7 (Reducing waste and supporting the circular economy) part B states that *"Referable applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted, to*

*demonstrate...*” Given that this development is not referable to the Mayor of London, a whole circular economy statement is not required.

## **BREEAM**

214. 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 BREEAM methodology assesses development on the basis of credits for a set of performance criteria covering issues such as energy, water, materials, waste, pollution, health and well-being, management, and ecology. 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.

## **Water efficiency**

215. The design of the development will aim to minimise internal potable water consumption. This will be achieved through the specification of low-flow sanitary fittings such as dual flush toilets, low flow taps and showers. Furthermore, a water meter with a pulsed output will be installed on the mains supply to all buildings to ensure water consumption can be monitored and managed and therefore encourage reductions in water consumption. A leak detection system will also be integrated into the water metering, employing trend analysis with an audible signal when a leak is detected, to reduce the impact of water leaks that would otherwise go undetected. Providing these water efficiency measure enables the development to comply with Policy SI5 of the London Plan 2021.

## **Digital connectivity infrastructure**

216. The NPPF recognises the need to support high-quality communications infrastructure for sustainable economic growth and to enhance the provision of local community facilities and services. To ensure London’s long-term global competitiveness, Policy SI6 (Digital Connectivity Infrastructure) of the London Plan 2021 requires development proposals to:
- be equipped with sufficient ducting space for full fibre connectivity infrastructure;
  - achieve internet speeds of 1GB/s for all end users, through full fibre connectivity or an equivalent.
  - meet expected demand for mobile connectivity; and
  - avoid reducing mobile capacity in the local area.
217. A pre-commencement condition has been attached to this decision to ensure compliance with the aims and objectives of Policy SI6 in assisting London’s long-term global competitiveness.



## PLANNING OBLIGATIONS (Section 106 Undertaking or Agreement)

218. 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

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

**Table: Section 106 Financial Obligations**

<b>Planning obligation</b>	<b>Mitigation</b>	<b>Applicant's position</b>
<b>Local Economy and Workspace</b>		
Employment	12 jobs set aside after completion for unemployed Southwark residents	Agreed
Affordable workspace	9.76% affordable workspace with the combination of rent and service charge up to £15 psqf for the end user	Agreed
<b>Transport and Highways</b>		
Highway works	<ul style="list-style-type: none"> <li>• A contribution towards the provision of a TfL Cycle Hire Docking Station (£5,000)</li> <li>• s.278 works with the highway authority for highway works, tree planting and traffic management change.</li> </ul>	Agreed

Parking permit restriction	Employees' ineligible to apply for on-street parking permits under any future CPZ operating in this locality.	Agreed
<b>Energy, Sustainability and the Environment</b>		
Futureproofing for connection to District Heat Network (DHN)	Prior to occupation, a CHP Energy Strategy must be approved setting out how the development will be designed and built so that it will be capable of connecting to the District CHP in the future.	Agreed
Achieving net carbon zero	an off-set payment of £29,811	Agreed
Archaeology monitoring/supervision fund	Contribution towards cost of providing technical archaeological support (£3,389 for schemes under 5,000sqm)	Agreed
Achieving Greenfield rates	A contribution of £7,027.20 to achieve Greenfield runoff rate	Agreed
Trees	A total of £38,313 for off-site planting	Agreed
Administration fee	Maximum contribution to cover the costs of monitoring these necessary planning obligations, calculated as 2% of total sum	Agreed

220. 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
- Appointment of workspace co-ordinator;
- Workspace Specification (including full M&E fit out);
- Triggers securing Practical Completion of workspace;
- Affordable Workspace Management Plan, including marketing requirements;

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

222. In the event that a satisfactory legal agreement has not been entered into by September 29<sup>th</sup> 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)”.

### S278 Works Outline

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

### **Mayoral and Southwark Community Infrastructure Levy (CIL)**

224. 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.
225. The site is located within Southwark CIL Zone 2 and MCIL2 Band2 zone. Based on the floor areas provided in the agent’s CIL Form1 (GIA Info) dated 04-Feb-21 and CIL Regs. “in-use building” criteria assessment, the **gross amount of CIL should be £191,929.35**, consisting £164,720 of Mayoral CIL and £27,209.35 of Borough CIL. It should be noted that **this is an estimate, and the indexation as well as floor areas on approved drawings will be checked again** after planning approval has been obtained.”

### **OTHER MATTERS**

226. None

### **CONCLUSION ON PLANNING ISSUES**

227. The major redevelopment of the site is supported and welcomed in principle. The principle of a commercial/office/studio 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.

228. 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.
229. The proposed scheme would be setback from each elevation which will activate the development at street level that is complimented by public realm improvements to Willow Walk and Crimscott Street. The development would also provide substantial gains in biodiversity, tree planting, and provides a 0.47 increase in Urban Greening on site.
230. The proposed development is car free and provides 50 cycling parking spaces, which is above the requirement of 44 cycling spaces on site. The setback of the development from Willow Walk and Crimscott Street is anticipated to significantly improve the pedestrian experience through comfort and circulation when entering, visiting or moving past the site.
231. 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.
232. The architectural design is considered to be of the highest quality and would significantly improve the site within the context of the surrounding area
233. 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.

## STATEMENT OF COMMUNITY INVOLVEMENT

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

**Table: List of meetings**

Meeting	Date	Attendees	Summary of discussions
Meeting with Councillor Stephanie Cryan	10th September 2020 at 11am	Councillor Stephanie Cryan, and project team	Councillor Cryan was interested in the other developments going on around the site. She asked what the workspaces would be like and who they are intended to be used by. She agreed with the team that flexible, smaller office spaces are more suitable for the area. Councillor Cryan queried the

affordability of the workspaces and homes proposed. She noted that she has a family history connecting her to the road and area agreed that it was in need of improvement. Councillor Cryan queried whether there would be any opportunities available for local apprenticeships during the construction. The team confirmed they would be interested in talking to local businesses and skilled local labourers. Councillor Cryan mentioned Southwark Works would be able to assist with this. Overall Councillor Cryan was pleased with the proposals and level of affordable office space being proposed.

Meeting with Neil Coyle MP	21 <sup>st</sup> September 2020 at 2pm	Neil Coyle MP, and project team	Overall Neil Coyle MP was positive about the proposals and suggested contacting Southwark Studios to see if they would be interested in the workspace. He noted that they have a waiting list and are actively looking for spaces. Neil Coyle MP added that the increased footfall in the area would be welcome and would improve the security in the area. He did say that the need for additional workspace may be questioned but that Southwark had a high demand for additional office space. Neil Coyle MP was optimistic about the proposals and supported the provision for additional office spaces and the subsequent community benefits.
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**Table: List of public consultation events carried out**

<b>Public consultation event</b>	<b>Date</b>	<b>Attendees</b>	<b>Summary of feedback</b>
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Online webinar event	8th September 2020 from 6pm-7pm	Invitations were sent to local residents and businesses.	The questions were primarily focussed on the height of the building, local infrastructure, the new homes and the local environment. There were also questions raised about the need for workspaces following the COVID-19 pandemic.
Public website	First available on 28th August 2020, and was update on 26 <sup>th</sup> August 2021	4 members of the public people attended the virtual consultation and six questions were asked after the presentation.	N/A
		To August 2021, the website has had 636 page views from 268 unique visitors.	

## Consultations

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

## Consultation Replies

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

## Human rights implications

237. 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.
238. This application has the legitimate aim of providing new mixed use development. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

## SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

239. N/A

## REASONS FOR LATENESS

240. N/A

**REASONS FOR URGENCY**

241. N/A

**BACKGROUND INFORMATION****BACKGROUND DOCUMENTS**

<b>Background Papers</b>	<b>Held At</b>	<b>Contact</b>
Site history file: 47-36 Application file: 21/AP/0681 Southwark Local Development Framework and Development Plan Documents	Environment, Neighbourhood s & Growth Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 1513 Council website: www.southwark.gov.uk

**APPENDICES**

<b>No.</b>	<b>Title</b>
Appendix 1	Recommendation
Appendix 2	Planning Policy
Appendix 3	Relevant Planning History
Appendix 4	Consultation undertaken
Appendix 5	Consultation responses received

**AUDIT TRAIL**

<b>Lead Officer</b>	Stephen Platts, Director of Planning and Growth	
<b>Report Author</b>	Troy Davies, Team Leader	
<b>Version</b>	Final	
<b>Dated</b>	13 March 2023	
<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments included</b>
Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
<b>Date final report sent to Constitutional Team</b>		16 March 2023

**APPENDIX 1: RECOMMENDATION**

<b>Applicant</b>	SITE SPECIFIC	<b>Reg. Number</b>	
<b>Application Type</b>	Full Planning Application		
<b>Recommendation</b>	Grant subject to Legal Agreement	<b>Case Number</b>	21/AP/0681

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

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

**At:** 24 CRIMSCOTT STREET, LONDON, SE1 5TE

**In accordance with application received on 30/03/2021**

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

P001 REV P2 - PROPOSED LOCATION PLAN  
P099 REV P2 - PROPOSED BASEMENT FLOOR PLAN  
P100 REV P2 - PROPOSED GROUND FLOOR PLAN  
P101 REV P2 - PROPOSED FIRST FLOOR PLAN  
P102 REV P2 - PROPOSED SECOND AND THIRD FLOOR PLAN  
P103 REV P2 - PROPOSED FOURTH AND FIFTH FLOOR PLAN  
P104 REV P2 - PROPOSED SIXTH AND SEVENTH FLOOR PLAN  
P106 REV P2 - PROPOSED ROOF PLAN  
P200 REV P2 - PROPOSED EAST ELEVATION  
P201 REV P2 - PROPOSED SOUTH ELEVATION  
P202 REV P2 - PROPOSED WEST ELEVATION  
P203 REV P2 - PROPOSED NORTH ELEVATION  
P210 REV P2 - PROPOSED DETAIL EAST ELEVATION  
P211 REV P2 - PROPOSED DETAIL SOUTH ELEVATION A  
P212 REV P2 - PROPOSED DETAIL SOUTH ELEVATION B  
P300 REV P2 - PROPOSED SECTION AA  
P301 REV P2 - PROPOSED SECTION BB  
P500 REV P2 - PROPOSED BALCONY DETAILS  
P501 REV P2 - PROPOSED CORNER BALCONY DETAILS

Reason:



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

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

Reason:

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

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

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

Reason:

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

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

Reason:

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

- 5 No development shall take place, including any works of demolition, until a written CEMP for the site has been devised. The CEMP shall oblige the applicant, developer and contractors to commit to current best practice with regard to site management and to use all best endeavours to minimise off site impacts. A copy of the CEMP shall be available on site at all times and shall 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 Engineering measures to eliminate or mitigate identified environmental impacts e.g. acoustic screening, sound insulation, dust control, emission reduction, location of specific activities on site, etc.;

- o Arrangements for direct responsive contact for nearby occupiers with the site management during demolition and/or construction (signage on hoardings, newsletters, resident's liaison meetings);
- o A commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme;
- o Site traffic - Routing of in-bound and outbound site traffic, one way site traffic, lay off areas, etc.;
- o Waste Management - Accurate waste identification, separation, storage, registered waste carriers for transportation and disposal to 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

Guidance on preparing CEMPs and best construction practice can be found at <http://www.southwark.gov.uk/construction>

All demolition and construction work shall then be undertaken in strict accordance with the plan and 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 unnecessary pollution or nuisance, in accordance with Policy P56 'Protection of amenity' of the Southwark Plan 2022 and the National Planning Policy Framework 2021.

- 6
- a) No works (excluding demolition and site clearance) shall commence until a 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 found that presents a risk to future users or controlled waters or other receptors, a detailed remediation and/or mitigation strategy shall be prepared and submitted to the Local Planning Authority for approval in writing. The strategy shall detail all proposed actions to be taken to bring the site to a condition suitable for the intended use together with any monitoring or maintenance requirements. The scheme shall also ensure that as a minimum, the site should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. The approved remediation scheme (if one is required) shall be carried out and implemented as part of the development.
  - c) Following the completion of the works and measures identified in the approved remediation strategy, a verification report providing evidence that all works required by the remediation strategy have been completed, together with any future monitoring or maintenance requirements shall be submitted to and approved in writing by the Local Planning Authority.
  - d) In the event that potential contamination is found at any time when carrying out the approved development that was not previously identified, it shall be reported in writing immediately to the Local Planning Authority, and a scheme of investigation and risk assessment, a remediation

strategy and verification report (if required) shall be submitted to the Local Planning Authority for approval in writing, in accordance with a-d above.

Reason:

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with Policy P56 'Protection of amenity' of the Southwark Plan 2022, and the National Planning Policy Framework 2021.

- 7 No works (excluding demolition and site clearance) shall commence until final details regarding construction methods and materials contained within a Fire Strategy are agreed in writing by the Local Planning Authority.

Reason:

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

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

Reason:

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

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

Reason:

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

- 10 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.

11 Prior to works commencing, including any demolition, an Arboricultural Method Statement shall be submitted to and approved in writing by the Local Planning Authority.

a) A pre-commencement meeting shall be arranged, the details of which shall be notified to the Local Planning Authority for agreement in writing prior to the meeting and prior to works commencing on site, including any demolition, changes to ground levels, pruning or tree removal.

b) A detailed Arboricultural Method Statement showing the means by which any retained trees on or directly adjacent to the site are to be protected from damage by demolition works, excavation, vehicles, stored or stacked building supplies, waste or other materials, and building plant, scaffolding or other equipment, shall then be submitted to and approved in writing by the Local Planning Authority. The method statements shall include details of facilitative pruning specifications and a supervision schedule overseen by an accredited arboricultural consultant.

c) Cross sections shall be provided to show surface and other changes to levels, special engineering or construction details and any proposed activity within root protection areas required in order to facilitate demolition, construction and excavation.

The existing trees on or adjoining the site which are to be retained shall be protected and both the site and trees managed in accordance with the recommendations contained in the method statement. Following the pre-commencement meeting all tree protection measures shall be installed, carried out and retained throughout the period of the works, unless otherwise agreed in writing by the Local Planning Authority. In any case, all works must adhere to BS5837: (2012) Trees in relation to demolition, design and construction and BS3998: (2010) Tree work - recommendations.

If within the expiration of 5 years from the date of the occupation of the building for its permitted use any retained tree is removed, uprooted is destroyed or dies, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time, as may be specified in writing by the Local Planning Authority.

Reason:

To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with The National Planning Policy Framework 2021 Parts 8, 11, 12, 15 and 16; Policies G1 (Green Infrastructure, G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021; and Strategic Policy SP6 'Climate emergency', and Policies P59 'Green infrastructure'; and P61 'Trees'; of the Southwark Plan 2022

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

12 Prior to the commencement of any above grade works (excluding demolition), details of bird and/or bat nesting boxes / bricks shall be submitted to and approved in writing by the Local Planning Authority. No less than 12 Swift bricks the top of the eastern elevation which shall be internal and set into the wall shall be provided and the details shall include the exact location, specification and design of the habitats.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with policies: G6 of the London Plan 2021, and Strategic Policy SP6 'Climate emergency', and Policy P60 'Biodiversity' of the Southwark Plan 2022

- 13 Prior to commencement of any works above grade (excluding demolition), detailed drawings at a scale of 1:5 or 1:10 through:
- i) all facade variations; and
  - ii) commercial fronts and residential entrances; and
  - iii) all parapets and roof edges; and
  - iv) all balcony details; and
  - v) heads, cills and jambs of all openings
- to be used in the carrying out of this permission shall be submitted to and approved by the Local Planning Authority in writing. The development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order that the Local Planning Authority may be satisfied as to the quality of the design and details in accordance with the National Planning Policy Framework 2021, Policy D9 Tall Buildings of the London Plan 2021, and Policies: P14 Quality in design; and P17 Tall buildings of The Southwark Plan 2022.

- 14 Prior to the commencement of any above grade works (excluding demolition), samples of all external facing materials and full-scale (1:1) mock-ups of the facades to be used in the carrying out of this permission shall be presented on site to the Local Planning Authority and approved in writing. The development shall not be carried out otherwise than in accordance with any such approval given. The facades to be mocked up should be agreed with the Local Planning Authority.

Reason:

In order that the Local Planning Authority may be satisfied that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing in accordance with the National Planning Policy Framework 2021, Policy D9 Tall Buildings of the London Plan 2021, and Policies: P14 Quality in design; and P17 Tall buildings of The Southwark Plan 2022.

- 15 Prior to the commencement of any above grade works (excluding demolition), details of security measures shall be submitted and approved in writing by the Local Planning Authority and any such security measures shall be implemented prior to occupation in accordance with the approved details which shall achieve the 'Secured by Design' accreditation award from the Metropolitan Police.

Reason:

In pursuance of the Local Planning Authority's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention in accordance with The National Planning Policy Framework 2021, and Policy P16 Designing out crime of the Southwark Plan 2022.

- 16 Prior to the commencement of any above grade works (excluding demolition), details and 1:50 scale drawings of the secure cycle parking facilities in line with London Cycle Design Standards and servicing layout and its relationship with the public highway shall be submitted to be approved in writing by the Local Planning Authority. The cycle parking facilities shall be provided prior to the occupation of the development and thereafter shall be retained and the space used for no other purpose and the development shall not be carried out otherwise in accordance with any such approval given.

Reason:

In order to ensure that satisfactory safe and secure cycle parking facilities are provided and retained in order to encourage the use of cycling as an alternative means of transport to the development and to reduce reliance on the use of the private car in accordance with The National Planning Policy Framework 2021, Policy T5 of the London Plan 2021, Strategic Policy 6 'Climate emergency' and Policy P53 'Cycling' of the Southwark Plan 2022.

- 17 Prior to the commencement of any above grade works (excluding demolition), details of the biodiversity green/brown roof shall be submitted to and approved in writing by the Local Planning Authority. The biodiversity green/brown roof shall be:

\* biodiversity based with extensive substrate base (depth 80-150mm);

\* laid out in accordance with agreed plans; and

\* planted/seeded with an agreed mix of species within the first planting season following the practical completion of the building works (focused on wildflower planting, and no more than a maximum of 25% sedum coverage).

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

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with: Policies G1 (Green Infrastructure) and G5 (Urban Greening) and of the London Plan 2021; and Strategic Policy SP6 'Climate emergency', and Policies P59 'Green infrastructure'; and P60 'Biodiversity'; of the Southwark Plan 2022

- 18 Prior to the commencement of any above grade works (excluding demolition), full particulars of the sprinkler system to be used within the commercial/office units shall be submitted to and approved by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with any approval given.

Reason:

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

- 19 Before any work above grade hereby approved begins (excluding superstructure demolition and site preparation), a full specification of a scheme for the fit out of the ground floor affordable workspace unit to an appropriate level for Class E 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 floor, wall and ceiling finishes, mechanical and electrical fit out of the unit, including heating, cooling and lighting provision, the inclusion of sprinkler systems for fire safety purposes and the provision of kitchen, and toilet facilities, and the installation of the ground floor units external windows and doors. The development shall not be carried out otherwise than in accordance with any approval given, and should be completed before the occupation of the commercial units on the upper floors.

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 and P31 Affordable Workspace 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.

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

Reason:

In order that the Council may be satisfied as to the details of the development in the interest of the visual amenity of the area, the amenity and privacy of adjoining occupiers, and their protection from light nuisance, in accordance with The National Planning Policy Framework 2021, Strategic Policy 12 Design and Conservation and Policies P56 'Protection of amenity' and P16 'Designing out crime' of the Southwark Plan 2022.

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

The planting, seeding and/or turfing shall be carried out in the first planting season following completion of building works and any trees or shrubs that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the same size and species in the first suitable planting season. Planting shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837

(2012) Trees in relation to demolition, design and construction and BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf).

Reason:

So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2021; and Strategic Policy SP6 'Climate emergency', and Policies P59 'Green infrastructure'; and P60 'Biodiversity'; of the Southwark Plan 2022

**Pre-occupation condition(s)** - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before the building(s) hereby permitted are occupied or the use hereby permitted is commenced.

- 22 Before the first occupation of the building hereby permitted, details of the arrangements for the storing of 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

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

Reason:

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

- 24 No commercial/office unit shall be occupied until a drainage verification report prepared by a suitably qualified engineer has been submitted to and approved in writing by the Local Planning Authority. The report shall provide evidence that the drainage system (incorporating SuDS) has been constructed according to the approved details and specifications (or detail any minor variations where relevant) as detailed in the Drainage Strategy prepared by GeoSmart (report ref: 73361.01R5, dated 07/01/2022) and shall include plans, photographs and national grid references of key components of the drainage network such as surface water attenuation structures, flow control devices and outfalls. The report shall also include details of the responsible management company.



Reason:

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

**Compliance condition(s)** - the following condition(s) impose restrictions and/or other requirements that must be complied with at all times once the permission has been implemented.

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

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

Reason:

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

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

Reason:

To ensure compliance with Strategic Policy 6 'Climate emergency' of the Southwark Plan 2022.

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

08.00 to 20.00hrs on Monday to Saturdays; and

10.00 to 16.00hrs on Sundays and Bank Holidays.

Reason:

To ensure that and occupiers of the development and occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance in accordance with The National Planning Policy Framework 2021, and Policy P56 'Protection of amenity of The Southwark Plan 2022.

- 28 The commercial units shall not be used except during the hours of 07.00 - 23.00 on any day.

Reason:

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities within the commercial premises accordance with The National Planning Policy Framework 2021, and Policy P56 'Protection of amenity of The Southwark Plan 2022.

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

Reason:

In order to ensure that no telecommunications plant or equipment which might be detrimental to the design and appearance of the building and visual amenity of the area is installed on the roof of the building in accordance with Chapter 12 (Achieving well-designed places) of the National Planning Policy Framework (2021); Policy D4 (Delivering good design) of the London Plan (2021); and Policies P13 'Design of places', and P56 'Protection of amenity' of the Southwark Plan 2022.

- 30 No mezzanine level is to be inserted in the ground floor

Reason:

To retain the 4 metre floor to ceiling height of the ground floor in line with the requirements of the draft Old Kent Road Area Action Plan (2020).

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

Reason:

In order to ensure that no additional plant is placed on the roof of the building in the interest of the appearance and design of the building and the visual amenity of the area in accordance with Chapter 12 (Achieving well-designed places) of the National Planning Policy Framework (2021); Policy D4 (Delivering good design) of the London Plan (2021); and Policies P13 'Design of places', and P56 'Protection of amenity' of the Southwark Plan 2022.

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

Reason:

To ensure such works do not detract from the appearance of the building (s) in accordance with Chapter 12 (Achieving well-designed places) 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 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

- 33 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. 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.
2. 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](mailto:trade.effluent@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk](http://www.thameswater.co.uk). Please refer to the Wholesale; Business customers; Groundwater discharges section.
3. We recommend that the requirements of the National Planning Policy Framework and National Planning Policy Guidance (NPPG) are followed. This means that all risks to groundwater and surface waters from contamination need to be identified so that appropriate remedial action can be taken. This should be in addition to the risk to human health which should be considered

by the Local Authority's environmental health department. We expect reports and risk assessments to be prepared in line with our groundwater protection guidance (previously covered by the GP3) and Land Contamination Risk Management principles (Model procedures for the management of land contamination). In order to protect groundwater quality from further deterioration:

- No infiltration-based sustainable drainage systems (SuDS) should be constructed on land affected by contamination, as contaminants can remobilise and cause groundwater pollution.
- Piling, or any other foundation designs using penetrative methods, must not cause preferential pathways for contaminants to migrate to groundwater and cause pollution. If Piling is proposed, a Piling Risk Assessment must be submitted, written in accordance with EA guidance document "Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention. National Groundwater & Contaminated Land Centre report NC/99/73".
- Investigative boreholes must be decommissioned to ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water supplies, in line with Paragraph 170 of the National Planning Policy Framework.

## APPENDIX 2: 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 19/EQ/0027. A number of meetings were held with the applicant and discussions centred around the provision of affordable housing, the height and massing of the scheme and the preferred ground floor use. Additionally, amenity space, quality of the residential accommodation and potential impacts upon surrounding occupiers were discussed during the pre-application stage.

### **Planning History of Adjoining Sites**

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

#### 20/AP/1120 – Sultra House, 29-31 Pages Walk

Application type: FULL

Demolition of existing buildings and erection of a 6-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

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 (24<sup>th</sup> 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 (5<sup>th</sup> November 2014)

## APPENDIX 4: CONSULTATION UNDERTAKEN

Press notice date: 22.04.2021 and 21.09.2021

Case officer site visit date: 26.10.2021

Neighbour consultation letters sent: 19.04.2021 and 21.09.2021

### 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  
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

Page House 33 Pages Walk London Southwark SE1 4SF	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
23 Crimscott Street London Southwark SE1 5TE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
72 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Studio 15 41A Crimscott Street London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
24 Pages Walk London Southwark SE1 4HR	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021

88 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
57 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
49 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 41 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
41 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 2 Lena Fox House 41 Crimscott Street London S	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
74 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 57 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Studio 10 41A Crimscott Street London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 12 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Studio 13 41A Crimscott Street London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 19 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 13 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 66 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 63 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021

	B21	21/09/2021	12/10/2021
84 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
75 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
30 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
16 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
13 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 46 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
60 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
30 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
28 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
21 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Studio 11 41A Crimscott Street London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 17 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 5 Lena Fox House 41 Crimscott Street London S	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
B5 Lena Fox House 41 Crimscott Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021

B10 Lena Fox House 41 Crimscott Street London Sout	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Units A And B Tower Bridge Business Park Mandela W	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 9 Arundel Buildings Webb Street London Southw	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 12 Arundel Buildings Webb Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
73 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
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	B21	21/09/2021	12/10/2021
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	B21	21/09/2021	12/10/2021
62 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
59 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
98 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
83 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
102 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
50 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
49 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
45 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021

	B21	21/09/2021	12/10/2021
40 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
3 Harold Estate Pages Walk London Southwark SE1 4H	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
29 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
27 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
2 Harold Estate Pages Walk London Southwark SE1 4H	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
17 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
3 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
29 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
26 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Lena Fox House 41 Crimscott Street London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
51 Grange Road London Southwark SE1 3BH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
53 Pages Walk London Southwark SE1 4HD	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 62 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 33 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021

Flat 24 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 53 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 29 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 15 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 85 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 84 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Studio 27 41A Crimscott Street London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 5 Twist House 38 Grange Road London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 23 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 30 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
B3 Lena Fox House 41 Crimscott Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
A10 Lena Fox House 41 Crimscott Street London Sout	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 22 36 Crimscott Street London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 21 36 Crimscott Street London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 17 36 Crimscott Street London Southwark	B28	19/04/2021	18/05/2021



	B21	21/09/2021	12/10/2021
Apartment 6 36 Crimscott Street London Southwark S	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 4 36 Crimscott Street London Southwark S	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 64 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 49 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 46 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 24 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 2 2 New Tannery Way London Southwark SE1	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 1 2 New Tannery Way London Southwark SE1	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
9 Burman Apartments 20A Crimscott Street London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 21 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Unit 6B The Willows 80 Willow Walk London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 5 Bridge View Court 19 Grange Road London Sou	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
1 Crimscott Street London Southwark SE1 5TE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
68 Willow Walk London Southwark SE1 5SF	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021

Flat 28 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 9 Alwen Court 6 Pages Walk London Southwark S	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
47 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
1 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 40 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 11 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Unit 8 Rich Industrial Estate 46 Willow Walk Londo	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
A8 Lena Fox House 41 Crimscott Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 86 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 3 Alwen Court 6 Pages Walk London Southwark S	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 72 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 52 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
87 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
110 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
16 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021

	B21	21/09/2021	12/10/2021
12 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
72 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 53 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 21 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
95 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
92 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
25 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
45 Grange Road London Southwark SE1 3BH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 2 46 Grange Road London Southwark SE1 3BH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 37 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 26 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
2 Rose Stapleton Terrace 16 Pages Walk London Sout	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Unit 6A The Willows 80 Willow Walk London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Marshall House 6 Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021

18 Pages Walk London Southwark SE1 4SB	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
83 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
96 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
90 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
87 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
77 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
76 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
112 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
111 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
105 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
34 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
1 Harold Estate Pages Walk London Southwark SE1 4H	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
5 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
45 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
2 Mandela Way London Southwark SE1 5SS	B28	19/04/2021	18/05/2021

	B21	21/09/2021	12/10/2021
61 Willow Walk London Southwark SE1 5SF	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
49 Grange Road London Southwark SE1 3BH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
55 Pages Walk London Southwark SE1 4HD	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
47 Pages Walk London Southwark SE1 4HD	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
43 Grange Road London Southwark SE1 3BH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 42 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 20 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 19 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 80 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 48 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 5 Alwen Court 6 Pages Walk London Southwark S	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Studio 23 41A Crimscott Street London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Studio 18 41A Crimscott Street London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Studio 12 41A Crimscott Street London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021

Room 13 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 3 Lena Fox House 41 Crimscott Street London S	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 36 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
B4 Lena Fox House 41 Crimscott Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
B14 Lena Fox House 41 Crimscott Street London Sout	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
36E Crimscott Street London Southwark SE1 5YQ	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 18 36 Crimscott Street London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 14 36 Crimscott Street London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 8 36 Crimscott Street London Southwark S	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 5 36 Crimscott Street London Southwark S	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 3 36 Crimscott Street London Southwark S	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Unit 1E 2 New Tannery Way London Southwark SE1 5ZW	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 79 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 73 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 62 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021

	B21	21/09/2021	12/10/2021
Apartment 42 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 26 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 23 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 5 2 New Tannery Way London Southwark SE1	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
8 Burman Apartments 20A Crimscott Street London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
3 Burman Apartments 20A Crimscott Street London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
2 Burman Apartments 20A Crimscott Street London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
1 Burman Apartments 20A Crimscott Street London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 1 Alwen Court 6 Pages Walk London Southwark S	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
48 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 34 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
A14 Lena Fox House 41 Crimscott Street London Sout	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 43 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 22 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021

70 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
88 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
31 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 15 Arundel Buildings Webb Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
9 Harold Estate Pages Walk London Southwark SE1 4H	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Gate House 40 Crimscott Street London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Studio 25 41A Crimscott Street London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Studio 16 41A Crimscott Street London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 33 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 58 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
81 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 60 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
44 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
25 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
22 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021



	B21	21/09/2021	12/10/2021
10 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 26 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
69 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
54 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
65 Pages Walk London Southwark SE1 4HD	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
99 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
4 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
54 Grange Road London Southwark SE1 3BH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 32 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 10 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Office Adjacent 63 Guinness Square Pages Walk Lond	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
B8 Lena Fox House 41 Crimscott Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 2 44 Grange Road London Southwark SE1 3BH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 6 43 Grange Road London Southwark SE1 3BH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021

28 Pages Walk London Southwark SE1 4HR	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 8 Arundel Buildings Webb Street London Southw	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 21 Arundel Buildings Webb Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 14 Arundel Buildings Webb Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
77 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
67 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
53 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
91 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
84 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
81 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
74 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
60 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
59 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
20 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
14 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021

	B21	21/09/2021	12/10/2021
6 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
44 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
32 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
18 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
56 Grange Road London Southwark SE1 3BH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
63 Pages Walk London Southwark SE1 4HD	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
59 Pages Walk London Southwark SE1 4HD	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 61 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 47 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 37 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 15 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 9 Bridge View Court 19 Grange Road London Sou	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 76 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 54 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021

Flat 36 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 34 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 14 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 4 Alwen Court 6 Pages Walk London Southwark S	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 2 Alwen Court 6 Pages Walk London Southwark S	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Studio 14 41A Crimscott Street London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Studio 2 41A Crimscott Street London Southwark SE1	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 39 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 24 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 19 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 14 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 33 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 9 Twist House 38 Grange Road London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
B11 Lena Fox House 41 Crimscott Street London Sout	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
36A Crimscott Street London Southwark SE1 5YQ	B28	19/04/2021	18/05/2021

	B21	21/09/2021	12/10/2021
Apartment 12 36 Crimscott Street London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Unit 1F 2 New Tannery Way London Southwark SE1 5ZW	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Unit 1D 2 New Tannery Way London Southwark SE1 5ZW	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 81 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 68 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 66 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 63 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 52 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 29 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 27 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 4 2 New Tannery Way London Southwark SE1	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
7 Burman Apartments 20A Crimscott Street London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
6 Burman Apartments 20A Crimscott Street London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
57 Pages Walk London Southwark SE1 4HD	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021

6 Harold Estate Pages Walk London Southwark SE1 4H	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
18 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
17 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 11 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
A15 Lena Fox House 41 Crimscott Street London Sout	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 3 44 Grange Road London Southwark SE1 3BH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
114 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 40 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Unit 2 The Willows 80 Willow Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 30 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 27 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 6 Alwen Court 6 Pages Walk London Southwark S	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
61 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
58 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
7 Harold Estate Pages Walk London Southwark SE1 4H	B28	19/04/2021	18/05/2021

	B21	21/09/2021	12/10/2021
Flat 55 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
33 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 36 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 16 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 10 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
57 Grange Road London Southwark SE1 3BH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 12 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
A1 Lena Fox House 41 Crimscott Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
18 - 19 Crimscott Street London Southwark SE1 5TE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 6 Arundel Buildings Webb Street London Southw	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 3 Arundel Buildings Webb Street London Southw	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 2 Arundel Buildings Webb Street London Southw	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
85 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
82 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021

80 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
76 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
65 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
107 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
37 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
2 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
15 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
2 Crimscott Street London Southwark SE1 5TE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
44 Willow Walk London Southwark SE1 5SF	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
51 Pages Walk London Southwark SE1 4HD	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 3 46 Grange Road London Southwark SE1 3BH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 59 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 57 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 48 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 38 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021



	B21	21/09/2021	12/10/2021
Flat 35 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 29 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 25 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 56 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 39 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 26 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 8 Alwen Court 6 Pages Walk London Southwark S	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Studio 21 41A Crimscott Street London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Studio 9 41A Crimscott Street London Southwark SE1	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 29 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 1 Lena Fox House 41 Crimscott Street London S	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 17 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 14 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 4 43 Grange Road London Southwark SE1 3BH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021

B9 Lena Fox House 41 Crimscott Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 11 36 Crimscott Street London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 1 36 Crimscott Street London Southwark S	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 76 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 74 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 56 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 55 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 54 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 39 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 38 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 36 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 28 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 7 Arundel Buildings Webb Street London Southw	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
61 Pages Walk London Southwark SE1 4HD	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 67 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021

	B21	21/09/2021	12/10/2021
115 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
35 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 31 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Studio 1 41A Crimscott Street London Southwark SE1	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 12 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
A7 Lena Fox House 41 Crimscott Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 13 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 23 Arundel Buildings Webb Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Unit 5 The Willows 80 Willow Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
78 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
63 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
4 Harold Estate Pages Walk London Southwark SE1 4H	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 1 46 Grange Road London Southwark SE1 3BH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Studio 28 41A Crimscott Street London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021

Sultra House 29-31 Pages Walk London Southwark SE1	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 38 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 10 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 69 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
78 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
65 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
19 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 50 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 34 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 28 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
89 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
69 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 34 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 13 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 10 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021

	B21	21/09/2021	12/10/2021
B13 Lena Fox House 41 Crimscott Street London Sout	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Unit 3 The Willows 80 Willow Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 1 44 Grange Road London Southwark SE1 3BH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 7A Arundel Buildings Webb Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
79 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
97 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
86 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
71 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
66 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
57 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
56 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
104 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
32 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
11 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021

9 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
41 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
40 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
24 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
13 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
10 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 56 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 40 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 4 Bridge View Court 19 Grange Road London Sou	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 82 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 73 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 51 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 37 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 22 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 2 Twist House 38 Grange Road London Southwark	B28	19/04/2021	18/05/2021

	B21	21/09/2021	12/10/2021
Flat 1 Twist House 38 Grange Road London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 21 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 8 Lena Fox House 41 Crimscott Street London S	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 41 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 39 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 22 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 6 Twist House 38 Grange Road London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
6 Rose Stapleton Terrace 16 Pages Walk London Sout	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
21-25 Pages Walk London Southwark SE1 4SB	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
A4 Lena Fox House 41 Crimscott Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
20 Crimscott Street London Southwark SE1 5TF	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
36F Crimscott Street London Southwark SE1 5YQ	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
36D Crimscott Street London Southwark SE1 5YQ	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
36B Crimscott Street London Southwark SE1 5YQ	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021

Apartment 20 36 Crimscott Street London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 13 36 Crimscott Street London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 9 36 Crimscott Street London Southwark S	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 2 36 Crimscott Street London Southwark S	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 77 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 67 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 61 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 53 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 47 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 41 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
5 Burman Apartments 20A Crimscott Street London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 60 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
113 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
39 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
51 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021



	B21	21/09/2021	12/10/2021
Flat 35 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 15 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 2 Bridge View Court 19 Grange Road London Sou	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Studio 20 41A Crimscott Street London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
19 Pages Walk London Southwark SE1 4SB	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
73 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Unit 37 22 Crimscott Street London Southwark SE1 5	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 44 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
79 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 30 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
58 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
24 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
35 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 23 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021

Living Accommodation Victoria 68-70 Pages Walk Lon	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Studio 19 41A Crimscott Street London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 49 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 44 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 24 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
106 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
103 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 58 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 31 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
49 Pages Walk London Southwark SE1 4HD	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
82 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
75 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
43 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
34 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Studio 8 41A Crimscott Street London Southwark SE1	B28	19/04/2021	18/05/2021

	B21	21/09/2021	12/10/2021
Studio 3 41A Crimscott Street London Southwark SE1	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 40 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 37 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 22 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 2 43 Grange Road London Southwark SE1 3BH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
B2 Lena Fox House 41 Crimscott Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
A12 Lena Fox House 41 Crimscott Street London Sout	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
21 Crimscott Street London Southwark SE1 5TE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 5 Arundel Buildings Webb Street London Southw	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 17 Arundel Buildings Webb Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
80 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
68 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
54 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
101 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021

48 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
43 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
23 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
21 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
38 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
14 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
48 Grange Road London Southwark SE1 3BH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
47 Grange Road London Southwark SE1 3BH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Rose Stapleton Terrace 16 Pages Walk London Southw	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 45 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 32 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 17 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 14 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 7 Bridge View Court 19 Grange Road London Sou	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 1 Bridge View Court 19 Grange Road London Sou	B28	19/04/2021	18/05/2021

	B21	21/09/2021	12/10/2021
Flat 42 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 18 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 11 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Studio 4 41A Crimscott Street London Southwark SE1	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 38 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 35 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 8 Twist House 38 Grange Road London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Store Adjacent 102 Guinness Square Pages Walk Lond	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 5 43 Grange Road London Southwark SE1 3BH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
B1 Lena Fox House 41 Crimscott Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 19 36 Crimscott Street London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 82 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 78 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 58 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021

Apartment 51 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 45 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 40 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
63A Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 20 Arundel Buildings Webb Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 47 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Unit 4 The Willows 80 Willow Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
A3 Lena Fox House 41 Crimscott Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 28 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
3 Rose Stapleton Terrace 16 Pages Walk London Sout	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Studio 22 41A Crimscott Street London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 83 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 18 Arundel Buildings Webb Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 16 Arundel Buildings Webb Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 13 Arundel Buildings Webb Street London South	B28	19/04/2021	18/05/2021

	B21	21/09/2021	12/10/2021
Flat 10 Arundel Buildings Webb Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 46 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 21 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 16 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 81 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 78 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
51 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
100 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
5 Harold Estate Pages Walk London Southwark SE1 4H	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
20-22 Pages Walk London Southwark SE1 4SB	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 49 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
36 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 8 Bridge View Court 19 Grange Road London Sou	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 3 Bridge View Court 19 Grange Road London Sou	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021

66 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
85 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
37 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Studio 6 41A Crimscott Street London Southwark SE1	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 32 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 3 Twist House 38 Grange Road London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
4 Rose Stapleton Terrace 16 Pages Walk London Sout	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 20 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Unit 1 The Willows 80 Willow Walk London Southwark	B28	19/04/2021	18/05/2021
15 Pages Walk London Southwark SE1 4SB	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Victoria 68-70 Pages Walk London Southwark SE1 4HL	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 19 Arundel Buildings Webb Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
17 Pages Walk London Southwark SE1 4SB	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
86 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
61 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021



55 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
67 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
53 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
52 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
31 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
26 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
12 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
50 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
39 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
23 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
20 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
50 Grange Road London Southwark SE1 3BH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
55 Grange Road London Southwark SE1 3BH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 6 Bridge View Court 19 Grange Road London Sou	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 68 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021

	B21	21/09/2021	12/10/2021
Flat 59 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 50 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 25 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 20 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 17 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Studio 24 41A Crimscott Street London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 4 Twist House 38 Grange Road London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 28 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 26 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 18 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 6 Lena Fox House 41 Crimscott Street London S	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 27 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 20 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 16 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021

9 Rose Stapleton Terrace 16 Pages Walk London Sout	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
8 Rose Stapleton Terrace 16 Pages Walk London Sout	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
5 Rose Stapleton Terrace 16 Pages Walk London Sout	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
1 Rose Stapleton Terrace 16 Pages Walk London Sout	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 8 43 Grange Road London Southwark SE1 3BH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 3 43 Grange Road London Southwark SE1 3BH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
B7 Lena Fox House 41 Crimscott Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
B12 Lena Fox House 41 Crimscott Street London Sout	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
A5 Lena Fox House 41 Crimscott Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
A2 Lena Fox House 41 Crimscott Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
A11 Lena Fox House 41 Crimscott Street London Sout	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 16 36 Crimscott Street London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 15 36 Crimscott Street London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 10 36 Crimscott Street London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 7 36 Crimscott Street London Southwark S	B28	19/04/2021	18/05/2021

	B21	21/09/2021	12/10/2021
Apartment 71 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 65 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 60 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 50 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 33 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 31 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 3 2 New Tannery Way London Southwark SE1	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
London Square Site Canteen Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
46 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 54 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 22 Arundel Buildings Webb Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 31 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
55 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
7 Rose Stapleton Terrace 16 Pages Walk London Sout	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021

12-14 Pages Walk London Southwark SE1 4SB	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
93 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
64 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
15 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
22 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 33 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 16 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 51 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 30 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 7 43 Grange Road London Southwark SE1 3BH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 4 Arundel Buildings Webb Street London Southw	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 75 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 74 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 55 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
47 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021

	B21	21/09/2021	12/10/2021
28 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
19 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 41 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 39 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 23 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
63 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
7 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
53 Grange Road London Southwark SE1 3BH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 27 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 25 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 29 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 24 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 18 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 7 Twist House 38 Grange Road London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021

Room 15 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 7 Lena Fox House 41 Crimscott Street London S	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
A9 Lena Fox House 41 Crimscott Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
A6 Lena Fox House 41 Crimscott Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Tenants Association Committe Room Guinness Square	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
26 Pages Walk London Southwark SE1 4HR	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 11 Arundel Buildings Webb Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 1 Arundel Buildings Webb Street London Southw	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
68 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
56 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
52 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
94 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
70 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
62 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
109 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021

	B21	21/09/2021	12/10/2021
108 Guinness Square London Southwark SE1 4HP	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
8 Harold Estate Pages Walk London Southwark SE1 4H	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
46 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
42 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
38 Harold Estate Pages Walk London Southwark SE1 4	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
8 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
42 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
36 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
33 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
27 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
11 Guinness Square London Southwark SE1 4HH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
52 Grange Road London Southwark SE1 3BH	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 52 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 27 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021



Flat 11 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 79 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 77 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 71 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 70 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 65 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 64 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 62 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 61 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 45 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 43 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 32 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 31 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 12 Alwen Court 6 Pages Walk London Southwark	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 7 Alwen Court 6 Pages Walk London Southwark S	B28	19/04/2021	18/05/2021

	B21	21/09/2021	12/10/2021
Studio 26 41A Crimscott Street London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Studio 17 41A Crimscott Street London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Studio 7 41A Crimscott Street London Southwark SE1	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Studio 5 41A Crimscott Street London Southwark SE1	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 38 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 36 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 35 Lena Fox House 41 Crimscott Street London	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 9 Lena Fox House 41 Crimscott Street London S	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Room 4 Lena Fox House 41 Crimscott Street London S	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 25 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 23 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 19 Twist House 38 Grange Road London Southwar	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
B6 Lena Fox House 41 Crimscott Street London South	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
A13 Lena Fox House 41 Crimscott Street London Sout	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021

36C Crimscott Street London Southwark SE1 5YQ	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 80 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
Apartment 75 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 72 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 70 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 69 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 59 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 57 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 48 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 44 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 43 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 37 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 35 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 34 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 32 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021

Apartment 30 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Apartment 25 2 New Tannery Way London Southwark SE	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
4 Burman Apartments 20A Crimscott Street London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021
Flat 18 Bridge View Court 19 Grange Road London So	B28	19/04/2021	18/05/2021
	B21	21/09/2021	12/10/2021

## APPENDIX 5 – CONSULTATION RESPONSES RECEIVED

### Statutory and non-statutory organisations

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

### Neighbour and local groups

59 Pages Walk London SE1 4HD
57 Pages Walk London Southwark SE1 4HD
28 Bermondsey Wall West London SE16 4UB
8 Grange Walk Mews London SE1 3DS
4 rose stapleton terrace 16 pages walk London SE1 4SB
Bushwood Drive 31 London SE1 5RE
Grenier 43 18 Gervase Street London SE15 2RS
Flat 11, Grenier Apartments 18 Gervase Street LONDON SE15 2RS
85 pages walk london SE1 4HD
401 Alaska Buildings 61 Grange Rd London SE1 3BB
47 Pages Walk 77 Westminster Bridge Road London SE1 3JW
67A Asylum Road London SE15 2RJ
71 Montpelier Rd Peckham London SE15 2HD
79 Pages Walk London SE1 4HD
79 Pages Walk London se14hd
47 Pages Walk 2A Crucifix Lane London SE1 3JW
Flat 4 5 Oswin Street London SE11 4TF
1 Rose Stapleton Terrace 16 Pages Walk London SE1 4SB
101 Pages Walk London SE1 4HD

77 Pages Walk Southwark SE1 4HD
59 Pages Walk London SE1 4HD
Flat 36 Grenier Apartments 18 Gervase Street London SE15 2RS
177 Neckinger Estate London SE16 3QG
1 Rose Stapleton Terrace 16 Pages Walk London SE1 4SB
2 Shad Thames London SE1 2YU
2 Rose Stapleton Terrace 16 Pages Walk London Se14sb
15 alsicot way London Se1 5xu
59 Pages Walk London LONDON SE1 4HD
Flat 3 230 Long Lane UK-LONDON SE1 4QA
FLAT 22 172 GRANGE ROAD London SE1 3BN
Flat 17 Kite House, 286 Lynton Road London SE1 5ZS
2 Tupman House London SE16 4UX
1 Sovereign Crescent Rotherhithe SE16 5XH
78 Harold Estate, Pages Walk Harold Estate London SE1 4HW
8 Milton Close London Se15td
13 Fern Walk London SE16 3JD
246 Merrow Street London SE17 2PA
1 Rose Stapleton terrace 16 Pages Walk London SE1 4SB
11 manor place London Se17 3be
29 Page's Walk London SE1 4HH
19 Gratton Road CHELTENHAM GL50 2BT
Apartment 41 2 New Tannery Way London SE1 5ZW
77 PAGES WALK LONDON SE1 4HD

33 Pages Walk Bermondsey Se1 4GU
59 Page's Walk London SE1 4HD
76 Guinness Square Pages Walk London SE1 4HP
15 Trappes House London SE16 3NT
63 Pages Walk London SE1 4HD
57 Pages Walk London Southwark SE1 4HD
91 Pages Walk Southwark London SE1 4HD
47 Pages Walk London SE1 SE1 4HD
170 lynton road London SE1 5RB
15 alscot way London Se1 5xu
21 Wilson Grove LONDON SE16 4PJ
63 Pages Walk London SE1 4HD
6 Rose Stapleton Terrace 16 Pages Walk London SE1 4SB
310 Arnold Estate London SE1 2DR
6 Rose Stapleton Terrace 16 Pages Walk London SE1 4SB
Maltings place London SE13LJ
89 Pages Walk London SE1 4HD
2 Maria Close London SE1 5BH
179 Providence Square London Se12ef
flat 2 36-38 Decima Street London Se14qq
25 Twist House 38 Grange Road London SE1 3FY
6 Rose Stapleton Terrace 16 Pages Walk London SE1 4SB
Flat 7 5 Plantain Place London Se1 1Yn
12 Asylum Road London SE15 2RL

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**MUNICIPAL YEAR 2022-23**

**COMMITTEE: PLANNING COMMITTEE**

**NOTE:** Original held in Constitutional Team; all amendments/queries to Gregory Weaver, Constitutional Team, Tel: 020 7525 3667

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		List Updated:21 March 2023	