

Planning Committee

Tuesday 18 October 2022

6.30 pm

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

Membership

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

Reserves

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

INFORMATION FOR MEMBERS OF THE PUBLIC

Access to information

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

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Contact

Gregory Weaver on 020 7525 3667 or email: greg.weaver@southwark.gov.uk
Webpage: <http://www.southwark.gov.uk>

Members of the committee are summoned to attend this meeting

Althea Loderick

Chief Executive

Date: 10 October 2022



Item No.

Title

Planning Committee

Tuesday 18 October 2022

6.30 pm

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

Order of Business

Item No.

Title

Page No.

PART A - OPEN BUSINESS

PROCEDURE NOTE

1. APOLOGIES

To receive any apologies for absence.

2. CONFIRMATION OF VOTING MEMBERS

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

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

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

4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

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

5. MINUTES

3 - 10

To approve as a correct record the Minutes of the open section of the meetings held on 14 September and 4 October 2022.

6. DEVELOPMENT MANAGEMENT

11 - 14

Item No.	Title	Page No.
6.1.	ILDERTON WHARF, 1-7 ROLLINS STREET (21/AP/4757) OLD KENT ROAD	15 - 147
6.2.	301-303 ILBERTON ROAD, LONDON (20/AP/3560) OLD KENT ROAD WARD	148 - 261
6.3.	98-104 RODNEY ROAD SE17 1RA (20/AP/2953) NORTH WALWORTH ROAD	262 - 342

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

Date: 10 October 2022

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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 14 September 2022 at 6.30 pm at Ground Floor Meeting Room G02A - 160 Tooley Street, London SE1 2QH

PRESENT: Councillor Richard Livingstone (Chair)
 Councillor Kath Whittam (Vice-Chair)
 Councillor Richard Leeming
 Councillor Reginald Popoola
 Councillor Bethan Roberts
 Councillor Cleo Soanes
 Councillor Sarah King

OFFICER SUPPORT: Dipesh Patel, Group Manager
 Sadia Hussain, Specialist Lawyer Planning
 Gregory Weaver, Constitutional Officer

1. APOLOGIES

Councillor Sarah King substituted for Councillor Ellie Cumbo, further apologies were received from Councillor Nick Johnson.

2. CONFIRMATION OF VOTING MEMBERS

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

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

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

4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

There were none.

5. MINUTES

The minutes of the meetings held on the 19 July 2022 and 26 July 2022 were approved as a correct record of the meeting.

6. TO RELEASE £700,703.45 OF SECTION 106 FUNDING FROM THE GREEN BUILDINGS FUND TO FUND MANOR GROVE COUNCIL HOMES REFURBISHMENT PROGRAMME

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

Members of the committee asked questions of the officers present.

RESOLVED:

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

7. 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

7.1 COLECHURCH HOUSE, LONDON BRIDGE WALK, LONDON

Planning Application Number: 20/AP/3013

PROPOSAL:

Redevelopment of the site to include demolition of Colechurch House, pedestrian footbridge and walkway and erection of an elevated 22-storey building (+ 4-storey basement) above a public park and providing office floorspace, retail floorspace, restaurant/café floorspace, leisure floorspace (all Use Class E), theatre and a bar (Sui Generis), delivered alongside a replacement pedestrian footbridge, public realm improvements, roof gardens, cycle parking, servicing, refuse, plant areas and other associated works incidental to the development.

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

Members of the committee asked questions of officer present.

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

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

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

RESOLVED:

1. That planning permission is granted subject to conditions, referral to the Mayor of London and the applicant entering into an appropriate legal agreement; and
2. That environmental information be taken into account as required by Regulation 26(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended); and
3. That the planning committee in making their decision has due regard to the potential Equalities impacts that are outlined in this report; and
4. That following the issue of planning permission, the director of planning and growth write to the secretary of state notifying them of the decision, pursuant to Regulation 30(1)(a) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017; and
5. That following issue of planning permission, the director of planning and growth place a statement on the Statutory Register pursuant to Regulation 28(1) of the TCP (EIA) Regulations 2017, which contains the information required by Regulation 28 and, for the purposes of Regulation 28(1)(h) being the main reasons and considerations on which the planning committee's decision was based shall be set out in the report; and

3

6. That, in the event that the requirements of (1) are not met by 31 December 2022 that the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in Paragraph 320 of this report.

7.2 35-39 PARKHOUSE STREET, LONDON SE5 7TQ

Planning Application Number: 19/AP/2011

PROPOSAL:

Demolition of existing buildings and construction of a mixed-use building up to nine storeys in height, comprising 85 residential units (Use Class C3) and 1,306 sqm (GIA) of commercial floorspace (Use Class E(g), B2 and B8) with associated car parking, landscaping and other associated work.

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

Members of the committee asked questions of officers present.

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

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

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

RESOLVED:

1. That planning permission be granted, subject to conditions and the applicant entering into an appropriate legal agreement by no later than 31 December 2022.
2. In the event that the requirements of (1.) are not met by 31 December 2022, that the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reason set out at paragraph 218 of this report.

Meeting ended at 9.15 pm

CHAIR:

DATED:



Planning Committee

MINUTES of the open section of the Planning Committee held on Tuesday 4 October 2022 at 6.30 pm at Ground Floor Meeting Room G02 - 160 Tooley Street, London SE1 2QH

PRESENT: Councillor Richard Livingstone (Chair)
 Councillor Kath Whittam (Vice-Chair)
 Councillor Ellie Cumbo
 Councillor Sam Foster (Reserve)
 Councillor Nick Johnson
 Councillor Reginald Popoola
 Councillor Cleo Soanes

OTHER MEMBERS PRESENT: Councillor Darren Merrill (ward councillor)

OFFICER SUPPORT: Colin Wilson (Head of Strategic Development)
 Nagla Stevens (Deputy Head of Law (Planning & Development))
 Dipesh Patel (Group Manager Strategic Applications Team)
 Michael Tsoukaris (Group Manager Design and Conservation)
 Victoria Crosby (Team Leader Strategic Applications Team)
 Troy Davies (Team Leader, Development Management)
 Alex Oyebade (Team Leader Transport Policy)
 Gerald Gohler (Constitutional Officer)

1. APOLOGIES

There were apologies for absence from Councillors Richard Leeming and Bethan Roberts.

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, addendum report and a briefing note from objectors to item 5.1, all of which had been circulated before the meeting.

4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

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

5.1 Plot H1 Elephant Park, Land bounded by Walworth Road, Elephant Road, Deacon Street and Sayer Street North, Elephant and Castle, London SE1

Councillor Ellie Cumbo, non-pecuniary, as she had signed an open letter in 2017 regarding the application to redevelop the shopping centre, but was approaching this application with an open mind.

5.2 Ilderton Wharf, 1-7 Rollins Street, London SE15 1EP

Councillor Richard Livingstone, non-pecuniary, as this application was located in his ward, but he would approach the application with an open mind.

5. DEVELOPMENT MANAGEMENT

RESOLVED:

That the recommendations set out in the report be noted.

5.1 PLOT H1 ELEPHANT PARK, LAND BOUNDED BY WALWORTH ROAD, ELEPHANT ROAD, DEACON STREET AND SAYER STREET NORTH, ELEPHANT AND CASTLE, LONDON SE1

Planning application number: 21/AP/1819

Report: Pages 5 to 255 of the main agenda pack and pages 1 to 4 of the addendum report.

PROPOSAL:

Redevelopment of the site to provide an 18-storey building (including a mezzanine floor) plus basement and rooftop plant providing office floorspace (Class E(g)(i)) and areas of floorspace for the following flexible uses; office/retail/services/food and drink/medical or health floorspace (Class E(g)(i), E(a), E(c), E(b) or E(e)), including ancillary cycle parking, accessible car parking, servicing, plant, roof terraces, landscaping, public realm improvements and other associated works incidental to the development.

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

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

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

At 21:07 the committee adjourned for a comfort break returning at 21:14.

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

Councillor Darren Merrill addressed the committee in his capacity as a ward councillor, and answered questions put by members of the committee.

The committee asked further questions of the planning officers and discussed the application. A motion to refuse the application was moved and seconded.

At 22:30 the meeting resolved to go into closed session to take advice from officers on potential reasons for refusal, returning to open session at 23:20.

The motion including the reasons for refusal was then put to the vote and declared carried.

RESOLVED:

That planning permission for the application be refused for the following reasons:

1. The excessive height, massing and bulk of the application would cause harm to the character and appearance of Elephant Road, Elephant Park and Walworth Road contrary to Southwark policies P13 part 1 and 2, and P17 part 2.5, and contrary to London Plan policies D9 part C.1.a.iii and D3 part D.
2. That the proposal would cause unacceptable harm to the neighbouring

amenity due to loss of daylight, contrary to Southwark Plan policies P14 part 3 and P56, and London Plan policy D6 part D.

5.2 ILBERTON WHARF, 1-7 ROLLINS STREET, LONDON SE15 1EP

RESOLVED:

That due to the late hour, this item be deferred to a future meeting to ensure the application can be considered fully.

The meeting ended at 23:25.

CHAIR:

DATED:

Item No. 6	Classification: Open	Date: 18 October 2022	Meeting Name: Planning Committee
Report title:		Development Management	
Ward(s) or groups affected:		All	
From:		Proper Constitutional Officer	

RECOMMENDATIONS

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

BACKGROUND INFORMATION

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

KEY ISSUES FOR CONSIDERATION

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

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

Community impact statement

11. Community impact considerations are contained within each item.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Director of Law and Democracy

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

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

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

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

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

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

BACKGROUND DOCUMENTS

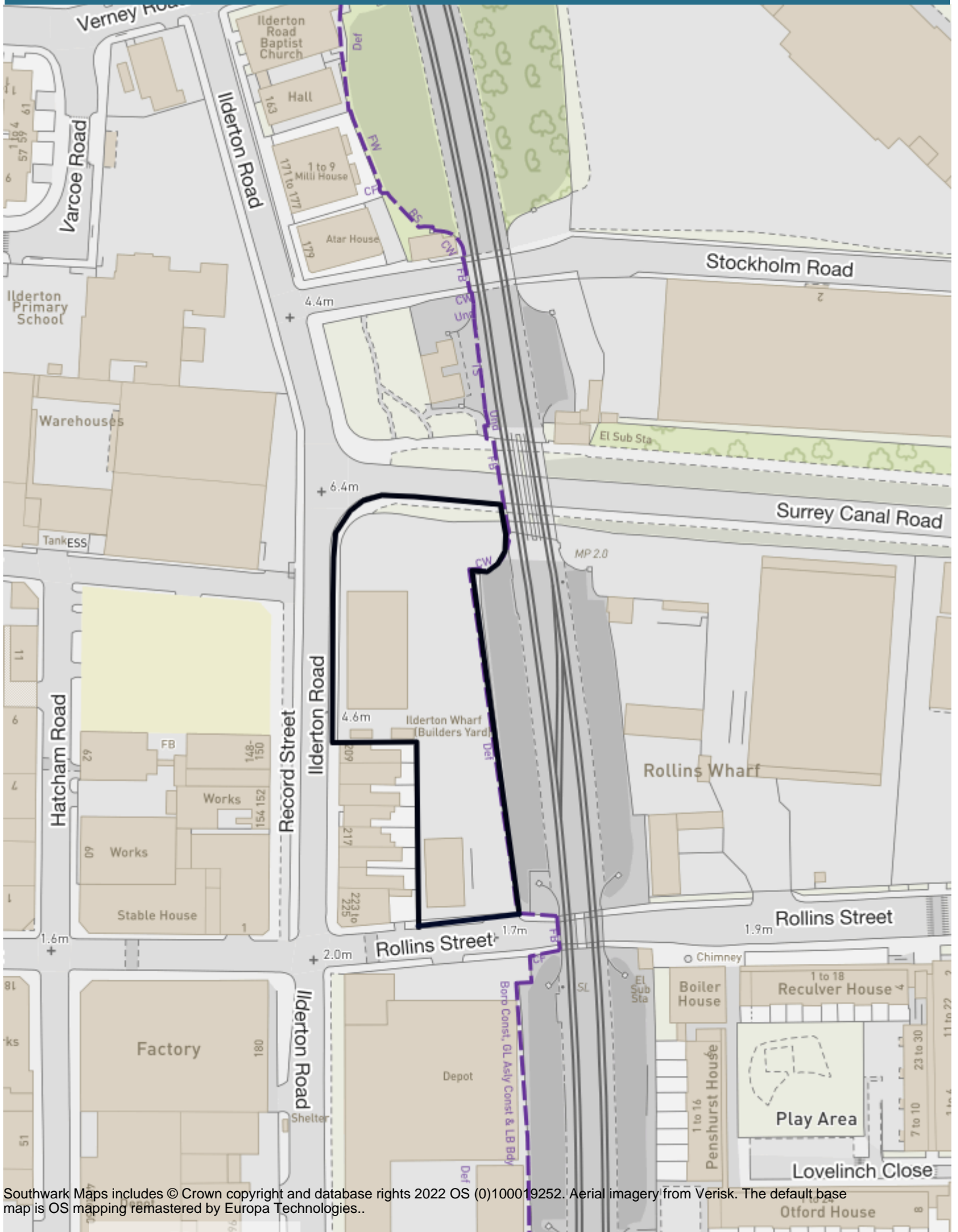
Background Papers	Held At	Contact
Council assembly agenda 23 May 2012	Constitutional Team 160 Tooley Street London SE1 2QH	Virginia Wynn-Jones 020 7525 7055
Each planning committee item has a separate planning case file	Development Management 160 Tooley Street London SE1 2QH	Planning Department 020 7525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

APPENDICES

No.	Title
None	

AUDIT TRAIL

Lead Officer	Chidilim Agada, Head of Constitutional Services		
Report Author	Gregory Weaver, Constitutional Officer Sadia Hussain, Specialist Lawyer Planning		
Version	Final		
Dated	10 October 2022		
Key Decision?	No		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title	Comments sought	Comments included	
Director of Law and Democracy	Yes	Yes	
Director of Planning	No	No	
Cabinet Member	No	No	
Date final report sent to Constitutional Team			10 October 2022



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Contents

RECOMMENDATION	4
EXECUTIVE SUMMARY	4
BACKGROUND INFORMATION.....	7
Site location and description	7
Details of Proposal.....	9
Consultation responses from members of the public	11
Consultation response from London Borough of Lewisham.....	11
KEY ISSUES FOR CONSIDERATION.....	12
Summary of main issues.....	12
Legal Context.....	13
EQUALITIES	13
Environmental Impact Assessment.....	15
PRINCIPLE OF DEVELOPMENT IN TERMS OF LAND USE	15
Opportunity Area.....	15
Industrial land.....	16
Employment and affordable workspace	18
Provision of Housing, Including Affordable Housing	20
Prematurity.....	21
AFFORDABLE HOUSING AND DEVELOPMENT VIABILITY	22
Affordable Housing	22
Development Viability	23
DESIGN CONSIDERATIONS	23
Site Layout.....	24
Height Scale and Massing (including consideration of Tall Buildings)	25
Architectural Design and Materiality.....	28
Landscaping.....	29
Ecology	31
Urban Greening Factor	31
Trees.....	32
Design Review Panel.....	33
HERITAGE AND TOWNSCAPE CONSIDERATIONS	34
Conservation Areas	34

Townscape and Visual Impact Assessment (TVIA)	35
HOUSING MIX, DENSITY AND RESIDENTIAL QUALITY	42
Housing Mix	42
Wheelchair Housing	43
Density	43
Quality of Residential Accommodation	43
OUTDOOR AMENITY SPACE, PLAY SPACE AND PUBLIC OPEN SPACE	45
Private Outdoor Amenity Space	46
Communal Amenity Space	46
Children’s Playspace	47
Public Open Space	49
Sunlight Amenity Analysis within the Proposed Development	50
Impact of the Proposed Uses	51
Daylight and Sunlight Impacts	51
Overlooking of Neighbouring Properties	59
TRANSPORT CONSIDERATIONS	60
ARCHAEOLOGY	64
AVIATION	65
TV AND RADIO SIGNALS	65
ENVIRONMENTAL CONSIDERATIONS	65
Refuse and Waste	65
Wind and Microclimate	66
Fire strategy	66
Flood Risk and Water Resources	67
Ground Conditions and Contamination	67
Air Quality	68
Noise and Vibration	68
Agent of change	69
SUSTAINABLE DEVELOPMENT IMPLICATIONS	69
Energy	69
Overheating	71
Whole life cycle and carbon capture	72
Circular economy statement	73

BREEAM.....	74
Water efficiency	74
Digital connectivity infrastructure	74
Health Impact Assessment	75
PLANNING OBLIGATIONS (Section 106 Undertaking or Agreement).....	75
Mayoral and Southwark Community Infrastructure Levy (CIL).....	79
Human rights implications	81
CONCLUSION ON PLANNING ISSUES.....	81
BACKGROUND INFORMATION.....	86
BACKGROUND DOCUMENTS	86
APPENDICES	87
AUDIT TRAIL	87
APPENDIX 1 – RECOMMENDATION	88
APPENDIX 2 – PLANNING POLICY.....	110
APPENDIX 3 – RELEVANT PLANNING HISTORY	116
APPENDIX 4 – CONSULTATION UNDERTAKEN	118
APPENDIX 5 – CONSULTATION RESPONSES RECEIVED.....	132

Item No.	Classification:	Date:	Meeting Name:
6.1	OPEN	18 October 2022	Planning Committee
Report title:	Development Management planning application: Application 21/AP/4757 for: FULL PLANNING APPLICATION Address: ILBERTON WHARF, 1-7 ROLLINS STREET, LONDON, SE15 1EP Proposal: Demolition of existing buildings and erection of a mixed use development comprising a building of part 9, 23 and 25 storeys above ground to provide a replacement builders merchants with associated office, trade counter sales area, showroom and external storage/racking, a commercial unit fronting Ilderton Road (Use Class E) 170 residential apartments (Use Class C3) and other associated infrastructure.		
Ward(s) or groups affected:	Old Kent Road		
From:	Director of Planning and Growth		
Application Start Date	21/01/2022	Application Expiry Date	22/04/2022
Earliest Decision Date	21/03/2022		

RECOMMENDATION

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

EXECUTIVE SUMMARY

3. The proposals involve the demolition of the existing Jewson builders' merchants and the construction of a building of two conjoined blocks to provide a mixed-use development incorporating a new facility for Jewson, as well as new homes, amenity spaces and improvements to the public realm.

4. The replacement builders' merchants has been designed by Jewson to meet their changing operational requirements. Compared to the existing facility, a larger double-height covered yard is proposed (including a mezzanine office area), with a smaller external yard to make more efficient use of the site. The space has also been designed to be flexible enough to accommodate a variety of industrial occupiers in the future should Jewson decide to vacate the site.
5. The proposals will provide 61 affordable homes and 109 market homes. The overall quantum of affordable housing would be 40.3% by habitable room (including 25.3% social rent) which exceeds policy requirements.
6. The quality of the proposed residential accommodation is considered to be good, meeting or exceeding the minimum space standards and providing 58.24% dual aspect accommodation. The proposal also provides a range of housing choices from one to four-bedroom properties, including 20.6% family homes (including 14 four-bedroom homes within the social rent), and 10.5% wheelchair housing by habitable room.
7. All residential units have access to large private amenity spaces in the form of balconies or winter gardens. The scheme also benefits from two communal amenity spaces (which comfortably accommodates all children's play space requirements) which are accessible to all residents within the development. The scheme also provides additional public realm with planting to allow for a safer and more attractive pedestrian environment around the site.
8. The scheme will be car free other than for a number of disabled parking spaces, an on-site residential loading bay, and a reduced number of retained spaces for Jewson staff and customers, with electric vehicle charging points provided throughout. The proposals also provide cycle parking in compliance with policy.
9. The proposals will achieve 67% on-site carbon emissions, with the deficit being captured by way of a financial contribution. The proposal involves the loss of four trees (two Category B and two Category C trees), albeit 21 new trees with greater variety, as well as physical and visual value are proposed, with conditions to secure adequate replacement and protection measures.
10. The application has resulted in one public objection. The key issue raised by the objector related to the development of more homes in the area in general terms.
11. The proposal is strongly supported by officers based on the reprovision of the existing Jewson facility to a higher specification, the high level of affordable housing proposed, as well as the excellent quality of accommodation, provision of the additional and enhanced public realm, and the overall design standards proposed. It is on this basis that the development is considered to be in conformity with the development plan when read as a whole (see full list of policies in Appendix 2 of this report) and is recommended for approval, subject to conditions and the completion of a suitable legal agreement.

Housing

12.

	Block A		Block B				Total		
	Social Rent		Intermediate		Private				
	Units	HR	Units	HR	Units	HR	Units	HR	%
1-Bed	5	10	8	16	40	80	53	106	31.2%
2-Bed	16	48	12	36	54	162	82	246	48.2%
3-Bed	0	0	6	24	15	60	21	84	12.4%
4-Bed	14	70	0	0	0	0	14	70	8.2%
	35	128	26	76	109	302	170	506	100%
Affordable Housing (By habitable room)	40.3% overall								

13. Non-residential

	Existing sqm	Proposed sqm
Internal GIA (<i>sui generis</i>)	657.7	890.6 sqm
External Yard GEA (<i>sui generis</i>)	2478.9	1059.1 sqm
Commercial GIA (E)	-	97.3 sqm

14. Amenity and Child Play Space

	Required sqm	Proposed sqm
Private Amenity Space	1,700 sqm	1,603.4 sqm
Communal Amenity Space	50 sqm	193 sqm
Child Play Space	757.3 sqm	757.3 sqm

15. Environmental

CO2 savings beyond Part L Bldg. Regs.	67%
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Trees lost	4 (Cat B/C)
Trees gained	21

	Existing	Proposed	Change +/-
Urban Greening Factor Score	Negligible	0.43	+ 0.43
Surface Water Run Off Rate	12.3 l/s	1.5 l/s	- 10.8 l/s
Green/Brown Roofs	0	491.38 sqm	+ 491.38 sqm
EVCPS (on site)	0	6	+ 6
Residential Cycle Parking Spaces	0	322 long-stay 6 short-stay	+ 328
Commercial Cycle Parking	0	8 long-stay 4 short-stay	+ 12
Commercial Car Parking	16	8	-8

16. CIL and S106 contributions

SCIL (estimated)	£2,624,027.43
MCIL (estimated)	£659,145.73
S106	Approximately £1,014,303m

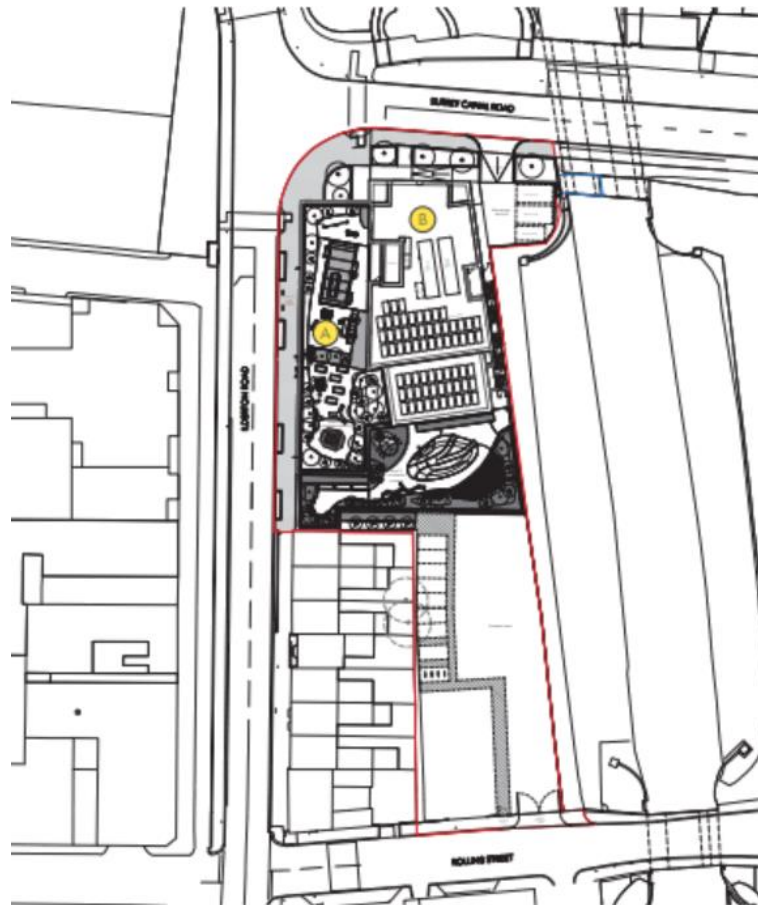
BACKGROUND INFORMATION

Site location and description

17. The subject site is located at the junction along Ilderton Road, Surrey Canal Road and Rollins Street, and abuts the railway line connecting London Bridge to the southern areas of London. The existing site is occupied by the builders' merchants, Jewson. It comprises a double-height shed, single-storey sales unit and an external working yard. Some parts of the site front onto Ilderton Road, mainly the northwest section, with the

remainder of the site tucked in behind one of the last remaining terraced rows along Ilderton Road.

18. There is a slight change in natural ground level when moving from south to north past or through the site. At the north-east corner of the site on the Surrey Canal Road elevation there is a change in natural ground level as the highway goes under the railway viaduct and into the council boundaries of neighbouring Lewisham Borough.
19. The existing site is accessed from the south via a gate on Rollins Street. This is the only point of access into the site for both vehicles and pedestrians. All other site boundaries are either fenced or have brick walls to the perimeter. This creates a very poor relationship with Ilderton Road and Surrey Canal Road. To the north of the site is a recently opened pocket park, Pat Hickson Gardens, which marks the end of the east-west cycle path that travels along Surrey Canal Road.
20. To the south of the subject site is the former Leathams building which received planning permission for significant redevelopment of the site under reference 19/AP/1773. This proposal is currently in its beginning stages of development, and the scheme is similar in height to this application, and also provides residential above industrial uses on lower ground floors of the scheme.
21. The subject site is located within Sub Area 4 (Hatcham, Ilderton and Old Kent Road (South) and specifically within Site Allocation OKR 16) of the Old Kent Road Area Action Plan (OKR AAP). The site is designated as a Locally Significant Industrial Site (LSIS) as per Southwark's current Proposals Map and as a Strategic Industrial Location (SIL) as per the adopted London Plan 2021.
22. The site is within an Urban Density Zone and an Air Quality Management Area. The site is located in Flood Zone 3 as identified by the Environment Agency. Additionally, the site is designated as being within the North Southwark and Roman Roads' Tier 1 Archaeological Priority Area. The site is not within a Conservation Area, nor are there any listed buildings on or within close proximity to the site.
23. Transport for London's (TfL) Public Transport Accessibility Level (PTAL) provides a score of 1-6b to rate areas within London and their accessibility to public transport options. A score of 1 represents the lowest accessibility with 6b being the best locations of accessibility to public transport. The subject site is rated as 2 on the PTAL system indicating poor accessibility to public transport. However, South Bermondsey railway station is approximately 600m north of the site (where there are 15-minute frequency services to London Bridge), while the P12 bus service which runs along Ilderton Road provides service to Surrey Quays.

Image: Site Plan**Details of Proposal**

24. Planning permission is sought for the demolition of existing buildings and erection of a mixed use development comprising a building of part 9, 23 and 25 storeys above ground to provide a replacement builders merchants with associated office, trade counter sales area, showroom and external storage/racking, a commercial unit fronting Ilderton Road (Use Class E), 170 residential apartments (Use Class C3), and other associated infrastructure.
25. As part of the comprehensive redevelopment of the site, the existing occupier, Jewson, will remain on site. The replacement builders' merchant's space has been specifically designed by Jewson to meet their own unique and changing operational requirements. Compared to the existing building on site, a larger double-height covered yard is proposed (including a mezzanine office/sales area) with a smaller external yard to make more efficient use of the site. The space has also been designed to be flexible enough to accommodate a variety of industrial occupiers in the future should Jewson decide to leave the site.
26. During the construction phase of the development, Jewson will maintain a presence in the southern half of the site through the temporary retention of the sales building whilst the predominant section of development at the northern section of the site is completed. The replacement builders' merchants will be supported by a total of 8

- parking spaces within the external yard (including 1 accessible car parking bay) similar to the existing arrangement; alongside 12 cycle parking spaces (8 long-stay spaces in a shelter within the external yard, and 4 short-stay spaces on Ilderton Road).
27. Children's playspace within the scheme is to be located at first floor podium level and on the eighth floor terrace, and comprises of 757.3sqm. The playspace will provide a variety of informal and imaginative play areas throughout the podium and terrace levels. Communal amenity is proposed on both the first floor podium, and the eighth floor terrace, amounting to 193sqm. The locations of the amenity spaces at the south and southwest of the building envelope enables these areas to maximise natural daylight and sunlight into the amenity spaces.
 28. Cycle Parking will be provided in accordance with the London Plan and New Southwark Plan requirements. 322 secure cycle parking spaces are proposed for future residents of the development, located at lower ground floor, and upper ground floor. In addition to this, 6 visitor parking spaces are to be located near to the residential entrance to Block B on the Surrey Canal Road frontage. The proposed development is to be car-free and occupants of the development who are Blue Badge holders would be eligible for a Residents Parking Permit.
 29. Refuse and recycling facilities will be provided at lower ground floor level with capacity for ten 1100L Eurobins consisting of six refuse bins, and four recycling bins for Block A. The refuse arrangement for Block B consists of twenty five 1100L Eurobins comprising of fifteen for general waste and ten for recycling purposes.
 30. 170 residential units are proposed comprising of a mix of 53 one bedroom units, 82 two bedroom units, 21 three bedroom units, and 14 four bedroom units (Use Class C3). There are no north facing single aspect units within the scheme, with circa 60% of units being dual aspect, including all family sized units. Residents will access the units from an entrance lobby for each block from Surrey Canal Road. Two lifts are provided for Block A residents, and three lifts are provided for Block B residents to ensure that the building continues to be fully accessible in the event of one lift breaking. Additionally, one staircase for each block is centrally located on the lower ground floor level to provide access to the upper floors.
 31. The development proposes 40.3% affordable housing by habitable room comprising of 25.3% social rent, and 15% intermediate. All four bedroom homes are provided in the social rent provision within the scheme. In total, 35 units are proposed for social rent, and 26 units are proposed for the intermediate affordable tenure. This amounts to 61 of the units being offered as affordable housing.

Table: Proposed land uses

Land Use	Use Class	GIA
Residential	C3	11,782.70sqm
Commercial	<i>Sui generis</i>	890.6sqm

	E	97.3sqm
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Revisions and Amendments

32. Whilst no design or alterations to the total number of residential units has occurred during the lifespan of this application, additional information regarding some areas of assessment was submitted. The documents were submitted in light of comments received from consultee comments. In acknowledging the further documents, and the nature of the information received re-consultation of the scheme was not required.
33. The documents of additional information submitted during the course of this application were as follows:
- Landscape Strategy and Urban Greening Factor
 - Flood Risk Assessment
 - Whole Life-Cycle Carbon Assessment
 - Circular Economy Statement
 - Energy Statement
 - Additional noise and vibration impact assessment information
 - Additional dynamic overheating information
 - Additional bird and bat box locations information
 - Additional cycle storage information
 - Rollins Street Road Safety Audit

Consultation responses from members of the public

34. One representation has been received raising an objection to the proposed development. The nature of the objection is summarised in the table below.

Table: Public comments on the development

Objection	Officer Response
<u>Addition of homes and impact on surrounding area</u> : Concern raised over development of more homes in the area in general terms	The development site has been identified within the OKR AAP, the Southwark Plan, and London Plan as a site allocation and an opportunity of where industrial/commercial uses can co-exist with residential uses. The proposed development complies with the aims and objectives of each plan mentioned above and also will provide much needed housing stock within the borough with a high level of affordable housing.

Consultation response from London Borough of Lewisham

35. Due to the eastern edge of the subject site abutting the borough boundary line with Lewisham, the authority was consulted on the application. Lewisham expressed

concern and lodged a formal objection to the development. The table below summarises the nature of the objection from Lewisham.

Table: London Borough of Lewisham comments on the development

Objection	Officer Response
<p><u>Vehicular access for servicing from Surrey Canal Road:</u> The proposed new vehicular access to Surrey Canal Road has the potential to have a detrimental impact on the operation of these additional bus services along Surrey Canal Road, with associated implications for timetabling and frequency of service. Its proximity to the junction with Ilderton Road is likely to result in frequent obstruction of traffic movement on Surrey Canal Road and have associated implications for the effective operation of the Surrey Canal Road / Ilderton Road.</p>	<p>A Stage 1 Safety Audit was submitted along with the application that recommends that the service area from Surrey Canal Road is accessed as a left turn in and left turn out servicing arrangement with banned right turns. As part of the recommendations of the Safety audit, the Ilderton Road/Surrey Canal Road junction will be upgraded to a Toucan intersection that will improve the functioning of the intersection. In addition, the developer must promote the relevant traffic order to impose a left turn in / left turn out movement and banned right turns.</p>
<p><u>Impacts on Surrey Canal Road/Ilderton Road junction:</u> In the context of the pedestrian and cycle improvement works that will be required to the Surrey Canal Road / Ilderton Road junction to safely accommodate bus turning movements, it is not clear that this has been taken into account in the design of the proposed development. We would expect that a proportionate financial contribution should be secured from any development on this site towards improvements to the Surrey Canal Road / Ilderton Road junction.</p>	<p>As stated above, the Surrey Canal Road/Ilderton Road will be upgraded to a Toucan intersection in light of the recommendations informed from the submitted Road Safety Audit. The improvements to this intersection will have capacity to adequately accommodate cycle and pedestrian improvements. The development has been setback from both Ilderton Road and Surrey Canal Road to enable a more comfortable pedestrian and cycle experience when moving past the site. It is also acknowledged that the upgraded intersection will assist in Transport for London's ambitions to potentially increase bus services along Surrey Canal Road.</p>

KEY ISSUES FOR CONSIDERATION

Summary of main issues

36. The main issues to be considered in respect of this application are:

- Equalities Impact Assessment
- Principle of the proposed development in terms of land use;
- Opportunity Area;
- Industrial land;
- Affordable workspace;
- Old Kent Road Phasing;
- Provision of housing;
- Affordable housing;
- Development viability;
- Design issues including site layout, tall buildings and heritage considerations;
- Landscaping, trees, biodiversity, and urban greening;
- Design Review Panel;
- Housing mix;
- Density;
- Quality of residential accommodation;
- Designing out crime;
- Private, communal amenity space, children's playspace & public open space;
- Impact of proposed development on amenity of adjoining neighbours and surrounding area;
- Transport;
- Archaeology;
- Refuse and waste;
- Wind and microclimate;
- Fire strategy;
- Flood risk and water resources;
- Ground contamination;
- Air quality and noise;
- Energy, sustainability and digital connectivity;
- Whole Life-Cycle and Circular Economy;
- Health Impact Assessment;
- Planning obligations; and
- Mayoral and borough community infrastructure levy

Legal Context

37. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2021, the Southwark Plan 2022 and the draft Old Kent Road Area Action Plan 2020.
38. There are also specific statutory duties in respect of the Public Sector Equalities Duty which are highlighted in the relevant sections in the overall assessment at the end of the report.

EQUALITIES

39. The Equality Act (2010) provides protection from discrimination for the following protected characteristics: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership. Section 149 of the Equality Act 2010 places the Local Planning Authority under a legal duty to have due regard to the advancement of equality in the exercise of its powers, including planning powers. Officers have taken this into account in the assessment of this application and Members must be mindful of this duty, inter alia, when determining all planning applications. In particular Members must pay due regard to the need to:
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act; and
 - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
 - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
40. As set out in the Essential Guide to the Public Sector Equality Duty (2014), “the duty is on the decision maker personally in terms of what he or she knew and took into account. A decision maker cannot be assumed to know what was in the minds of his or her officials giving advice on the decision”. A public authority must have sufficient evidence in which to base consideration of the impact of a decision.
41. The Strategic Housing Market Assessment (SHMA) prepared on behalf of a number of South East London boroughs states that Southwark, together with Lewisham, has the most ethnically mixed population in the South East London sub-region. Compared to the population at large a very high proportion of Black households (70%) are housed in the social/affordable rented sector. These groups could therefore stand to benefit from the proposed affordable housing, which would include social rented units. The provision of communal amenity spaces to be shared by different tenures would also contribute to the potential for increased social cohesion. This is a positive aspect of the scheme.
42. There are a large number of existing black and ethnic minority businesses in the local area, which would not be directly affected by the proposed development. However, the impact of the development would increase footfall in the local area and could create a number of opportunities for these existing businesses.

Other Equality Impacts

43. Travellers are a group with protected characteristics. The closest Travellers site to the proposed development is located close to the junction with Rotherhithe New Road and Ilderton Road. The distance between the Travellers site and the subject site is circa 390 metres to north. Given the sufficient separation distance it is therefore considered that no adverse impacts would occur to this group.
44. The proposed development would also generate additional opportunities for local employment. The proposed development would deliver increase the amount of commercial floorspace from 657.7sqm to 987.9sqm. The new floorspace will provide

more efficient layout for Jewson to operate in and is considered to be a significantly positive aspect of the development proposal.

Conclusion on Equality Impacts

45. The proposed development would not result in any adverse equality impacts in relation to the protected characteristics of religion or belief and race as a result of the proposed development incorporating a mixed use scheme of residential units in C3 Use Class above ground and ground floor/mezzanine level commercial units. Notwithstanding that the development would result in a significant change to the site, Officers are satisfied that equality implications have been carefully considered throughout the planning process and that Members have sufficient information available to them to have due regard to the equality impacts of the proposal as required by Section 149 of the Equality Act 2010 in determining whether planning permission should be granted.

Environmental Impact Assessment

46. A Screening Opinion was submitted under Southwark planning reference 21/AP/1146 to determine whether an Environmental Impact Assessment (EIA) would be required for this development. The Screen Opinion demonstrated that an EIA for this proposal would not be required.

PRINCIPLE OF DEVELOPMENT IN TERMS OF LAND USE

Opportunity Area

47. The site is located within the Old Kent Road Opportunity Area (close to the Central Activities Zone) where the London Plan recognises the potential for “significant residential and employment growth” to be realised through a suitable planning framework that optimises development in conjunction with improvements to public transport accessibility
48. The Old Kent Road Area Vision of the Southwark Plan 2022 sets out the overall vision for the Old Kent Road. The policy says development should:
- Deliver direct benefits to the existing community including new and improved homes including new council homes, schools, parks, leisure and health centres, and the creation of jobs;
 - Promote car free development and support the Bakerloo Line extension, electric buses, taxis, commercial vehicles and cycling which will help to tackle air and noise pollution;
 - Help foster a community in which old and young can flourish;
 - Build new homes that come in a range of types from terraced houses to apartments with a high design quality including generous room sizes, high ceilings and big windows to ensure people have space to think and to rest;
 - Link existing open spaces like Burgess Park to each other and new park spaces;

- Demonstrate excellent standards of environmental sustainability including pioneering new district heating networks to reduce carbon emissions, measures to tackle poor air quality and sustainable urban drainage systems to reduce flood risk.
49. The Old Kent Road Area Vision also states that the Old Kent Road Area Action Plan (OKR AAP) will set out the physical framework that will enable the community to realise its potential. The council is in the process of preparing this Area Action Plan for Old Kent Road which proposes significant transformation of the Old Kent Road area over the next 20 years, including the extension of the Bakerloo Line with new stations along the Old Kent Road towards New Cross and Lewisham. A further preferred option of the Old Kent Road AAP (Regulation 18) was published in December 2020. As the document is still in draft form, it can only be attributed limited weight.

Industrial land

50. The application site is identified within the Southwark Plan 2022 (Policy P29) as a Locally Significant Industrial Site (LSIS). The objective of this designation is for LSIS sites to be intensified for residential and industrial co-location. In addition, the site is also within the boundaries of Site Allocation NSP70 '*Hatcham Road and Penarth Street and Ilderton Road*' of the Southwark Plan 2022. NSP70 requires developments to:
- Provide new homes (C3); and
 - Provide at least the amount of employment floorspace currently on the site (E(g), B class); and
 - Provide industrial uses (E(g)(iii) or B8 use class); and
 - Provide public open space - 1,990m²
51. The redevelopment of the site would accommodate 170 residential units, an increase on the existing provision of employment floorspace on site, retain the existing occupier on site, and provides 245sqm of public open space. The provision of open space would contribute towards the overall goal of 1,990sqm of public open space for the NSP70 allocation.
52. Policies E4 and E7 of the London Plan support the intensification and improvement of industrial uses on existing employment sites in order to ensure a sufficient supply of industrial capacity across London. Whilst not an "industrial" use per se, the proposed builders' merchants is a re-provision of an existing use on-site that supports other industrial activities.
53. The Old Kent Road was designated as an Opportunity Area through the previous iteration of the London Plan, with an indicative capacity of 1,000 new jobs and a minimum of 2,500 new homes. However, this has been increased to an indicative capacity of 12,000 homes in the New London Plan (2021). The London Plan notes that the emerging OKR AAP should "*set out how industrial land can be intensified and provide space for businesses that need to relocate from any SIL identified for release. Areas that are released from SIL should seek to co-locate housing with industrial uses, or a wider range of commercial uses*".

54. Furthermore, the draft OKR AAP sets targets of 20,000 new homes and 10,000 new jobs, to be supported by new infrastructure, including parks and schools. It proposes the release of a substantial part of the Strategic and local Preferred Industrial Location designation to allow for the creation of mixed use neighbourhoods where new and existing businesses would co-exist with new homes.
55. Paragraph 141(a) of the NPPF promotes making effective use of underutilised land, especially where this would help meet an identified need for housing. This has been incorporated into adopted policy as set out in Policy GG2 of the London Plan which seeks to prioritise the development of Opportunity Areas and sites which are well-connected by existing or planned Tube and rail stations and small sites. The application site is located within the Old Kent Road Opportunity Area. In locations such as this, both London Plan and Southwark Plan policies strive for higher density, high quality mixed use developments which assist in addressing the need for new homes and ranges of employment opportunities.
56. In the draft OKR AAP, the site is identified as falling within Sub Area 4 and Proposal Site OKR16. The AAP reiterates the purpose for LSIS sites to incorporate new homes typologies into developments to co-exist along with industrial uses on site. This is illustrated in the typologies map on the following page of this report.
57. The existing use on site is not considered to maximise the potential of this Opportunity Area Proposal Site. The proposed re-development of the site would introduce a mixed use building comprising of the retention of the Jewson Builders' Merchants on site on the ground and mezzanine floor levels, and C3 residential Use Class to the upper floors. It is anticipated that the scheme would deliver major regeneration benefits that are further discussed in the proceeding parts of this report.

Image: Sub Area 4 - OKR16 with subject site outlined in red



Image: Typologies map of OKR16 – Subject site outlined in red



Employment and affordable workspace

Employment Re-provision

58. Compared to the existing facility, a larger double-height covered yard is proposed (including a mezzanine office/sales area) with a smaller external yard to make more efficient use of the site. Overall, the proposed development provides an uplift in employment floorspace and re-provides Jewson with a modern facility that is fit for purpose. A small commercial unit is also provided fronting Ilderton Road (Use Class E) that would be occupied by Jewson as a sales room. The proposals would result in an increase on the 9 existing full time employed (FTE) jobs with a predicted 15 FTE jobs. The council's Local Economy Team (LET) have reviewed the scheme and support the proposal. Triggers for employment obligations have been recommended by LET and are to be secured in the S106 Agreement.

Image: Lower ground floor layout

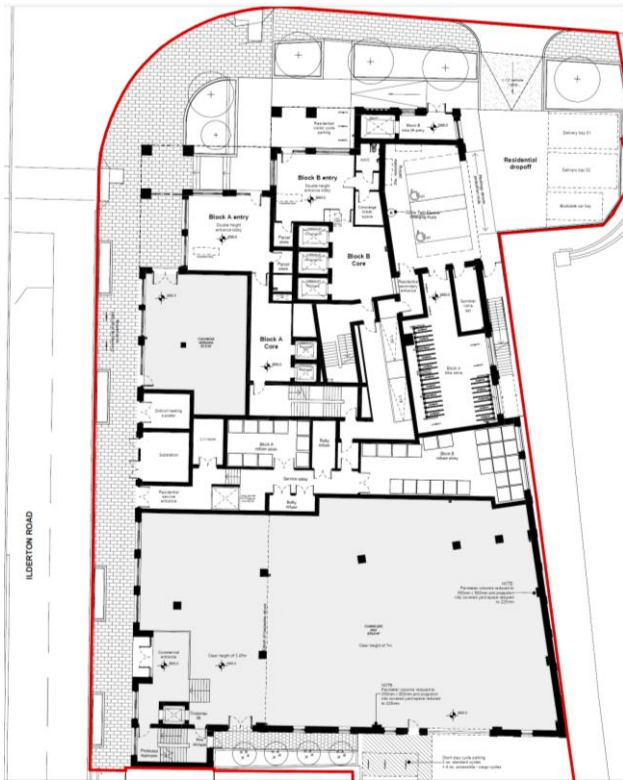
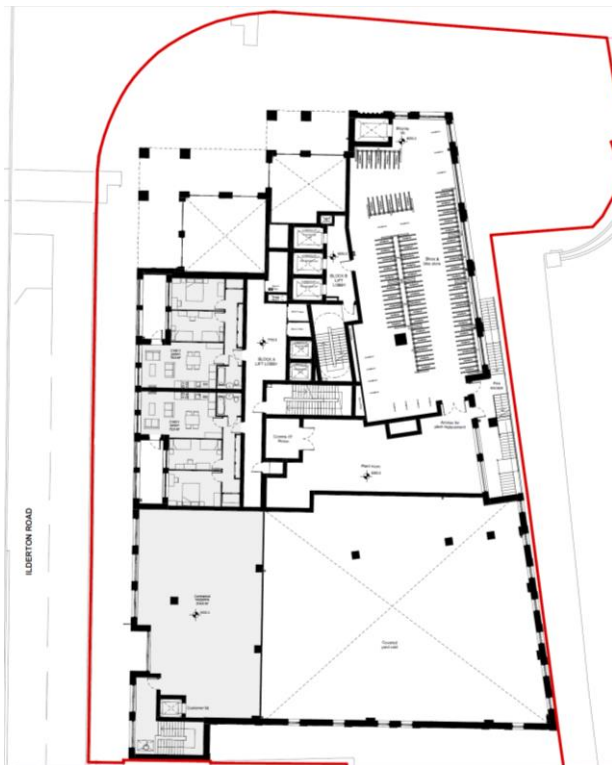


Image: Upper ground floor layout



Affordable workspace

59. Policy P31 of the Southwark Plan requires developments proposing 500sqm GIA or more employment floorspace to provide 10% of the proposed gross employment floorspace as affordable workspace on site at discount market rents. In this instance; however, the replacement builders' merchants space has been specifically designed by Jewson to meet their own unique and changing operational requirements, and no affordable workspace is proposed on site. Jewson has a strong presence within Southwark and employs many people, and it is therefore considered in this instance, that there is no in-principle objection to no affordable workspace being provided as part of this redevelopment.
60. It is acknowledged that there is a 97.3sqm commercial unit on the ground floor, and it is the intention of Jewson to use this unit for their operational needs. In addition, the commercial floorspace has been designed to be flexible enough to accommodate a variety of industrial occupiers in the future should that be required in the event Jewson vacate the site. Given this potential, a mechanism is to be included in the S106 Agreement that should Jewson not occupy the redevelopment, or if Jewson vacate the premises in the future, that the 97.3sqm unit is occupied by an affordable workspace business. This would amount to 10.92% of the floorspace within the development.

Provision of Housing, Including Affordable Housing

61. The development would provide 61 affordable units that comprises of 35 social rented units, and 26 intermediate homes. This equates to a total of 40.3% affordable housing by habitable rooms. The provision of affordable housing proposed within the scheme is a significantly positive aspect of the scheme. Additionally, the proposed social rent homes would be provided at social rent levels.

Old Kent Road Phasing

62. The Greater London Authority (GLA) and Transport for London (TfL) officers have worked closely with Southwark Council officers to agree the broad geography and phasing of development in the area covered by the OKR AAP, to help provide certainty to communities, local businesses and developers in advance of the Bakerloo Line Extension (BLE) and a clear timetable for its delivery. This has resulted in broad agreement between the GLA, TfL and Southwark Council on the scale and geography of the area's new town centres, where industrial uses will be retained, replaced and intensified, and how housing delivery will be phased in advance of the BLE. Broad alignment and the location of potential tube stations has also been agreed between Southwark Council and TfL and formal safeguarding is in place (which is further discussed later in the below paragraphs).
63. As part of this process, a cap of 9,500 net additional homes has been agreed for Phase 1 until a BLE construction contract is in place. In this case, recognition has been given to the severity of the need to provide housing stock along with retaining a good quality employer within Southwark on an improved and functional floorspace to support

Jewson in continuing their operations. As such, officers have worked to incorporate the redevelopment of the subject site into the 9,500 cap.

Prematurity

64. Legal Advice received in relation to this issue highlights the following from the National Planning Policy Guidance:
65. “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.
66. 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.”
67. The most up to date adopted development plan documents pertinent to the Old Kent Road are the 2021 London Plan and the Southwark Plan 2022. These identify the Old Kent Road Opportunity Area as having significant potential for housing led growth. The draft OKR AAP has been developed in response to the adopted London Plan (and its previous iteration London Plan 2016) and has also sought to address the increased housing target for the opportunity area and the need to ensure that the London Plan aspirations for employment and residential are addressed. The scheme under consideration here is not considered to undermine either the strategic or local plan making process, and reflects the adopted statutory development plan position of the 2021 London Plan, the Southwark Plan 2022, and the 2017 and 2020 draft OKR AAPs. It is not therefore considered to be premature.

Conclusion on Land Use

68. The scheme would deliver major regeneration benefits, including a significant contribution to the borough’s housing stock, 40.3% affordable housing, the re-provision of the Jewson Builders’ Merchants, and a significant improvement to the existing commercial space. It is therefore considered that the development, in land use terms, is acceptable, and its contribution to the surrounding Old Kent Road Opportunity Area (OKROA) should be supported.

AFFORDABLE HOUSING AND DEVELOPMENT VIABILITY

Affordable Housing

69. National, regional and local planning policies place a high priority on the delivery of affordable housing as part of the plan led approach to addressing the housing crisis. Southwark's Strategic Housing Market Assessment (SHMA) identifies a need for 2,077 social rented and intermediate homes per annum which is approximately 71% of Southwark's total housing need. The SHMA suggests that approximately 78% of the total affordable housing need is for intermediate housing to meet the housing needs of lower and middle income residents. However, the most acute need is for social rented housing to meet the needs of homeless households living in unsuitable temporary accommodation such as bed and breakfasts or overcrowded conditions.
70. The regional policies relating to affordable housing are set out in the London Plan 2021, with the three key policies being H4, H5 and H6. These should be applied having regard to the Mayor's 'Housing' and 'Affordable Housing and Viability' SPGs. Policy H4 requires development to deliver the maximum reasonable amount of affordable housing, with the Mayor setting a strategic target of 50%. Policy H6 also prescribes the tenure split of affordable housing. It requires:
- at least 30% to be low-cost rent (social rent or London Affordable Rent);
 - at least 30% to be intermediate (with London Living Rent and shared ownership being the default tenures); and
 - the remaining 40% to be determined by the borough as low-cost rented homes or intermediate tenure(s) based on identified local need.
71. The Southwark Plan Policy P1 sets a requirement for a minimum of 25% of all the housing to be provided as social rented and a minimum of 10% intermediate housing to be provided. In accordance with Policy P1, rooms that are over 28sqm have been counted as two habitable for the purposes of calculating affordable housing. This accounts for large open plan living room spaces that include kitchens and dining areas.

Table: Affordable housing mix

	Block A		Block B				TOTAL		
	Social Rent		Intermediate		Private		Units	HR	%
	Units	HR	Units	HR	Units	HR			
1 Bed	5	10	8	16	40	80	53	106	31.2%
2 Bed	16	48	12	36	54	162	82	246	48.2%
3 Bed	0	0	6	24	15	60	21	84	12.4%
4 Bed	14	70	0	0	0	0	14	70	8.2%
	35	128	26	76	109	302	170	506	100%

72. In total, 506 habitable rooms would be provided in the proposed development. Of this amount, 128 habitable rooms equating to 35 units forms the social rent aspect of the development, 76 habitable rooms makes up the 26 units in the intermediate tenure,

and 302 habitable rooms that amounts to 109 private units. In total 40.3% affordable housing is proposed with 25.3% proposed for social rent, and 15% proposed for the intermediate tenure based on habitable rooms. This exceeds the requirement for 25% of homes to be social rented complying with Policy P1.

73. With regards to access to grant funding, the applicant (Twenty Twenty Ilderton Wharf Limited and SGBD Property Holdings Limited) has not applied for grant funding from the GLA for the additional affordable housing. However, they are seeking to partner with a Registered Provider (RP) post consent to deliver the affordable housing, and the RP may want to access grant funding at that point. It is therefore considered that the need to maintain the ability for an RP to access potential grant funding is allowed post consent.

Development Viability

74. Policy P1 states that where development that provides 40% affordable housing, with a policy compliant tenure mix, (e.g. a minimum of 25% social rented and a minimum of 10% intermediate housing) as set out in table 1 with no grant subsidy can follow the fast-track route. Where developments follow the fast track route they will not be subject to a viability appraisal. The fast-track route for affordable housing provision has also been agreed with the GLA during pre-application discussions. A viability appraisal will be necessary if amendments are proposed to lower the affordable housing provision to less than 40% following the grant of planning permission.
75. As the development provides 40.3% affordable housing based on habitable rooms, totalling 61 units, the development is therefore eligible for the fast track route. Given the above, the application is compliant with policy and therefore does not require a viability assessment to be submitted with the application.

Conclusion on Affordable Housing

76. In conclusion, this development does not currently benefit from public subsidy (although grant funding may be applied for in the future by a Registered Provider once appointed), and provides a combined affordable housing offer of 40.3% that exceeds Policy P1 fast track requirements. The delivery of social rent, and intermediate units is a very positive aspect of the proposals. In line with section E of London Plan Policy H5, to ensure the applicant fully intends to build out the permissions, the requirement for an Early Stage Viability Review will be triggered if an agreed level of progress on implementation is not made within two and a half years of the permission being granted. This will be secured through the S106 Agreement.

DESIGN CONSIDERATIONS

77. The NPPF requires that good design is a key aspect of sustainable development and is indivisible from good planning (paragraph 124). Chapter 3 of the London Plan seeks to ensure that new developments optimise site capacity whilst delivering the highest standard of design in the interest of good place making. New developments must enhance the existing context and character of the area, providing high quality public

realm that is inclusive for all with high quality architecture and landscaping. The importance of good design is further reinforced in the Southwark Plan Policies P13 and P14 which require all new buildings to be of appropriate height, scale and mass, respond to and enhance local distinctiveness and architectural character; and to conserve and enhance the significance of the local historic environment. Any new development must take account of and improve existing patterns of development and movement, permeability and street widths; and ensure that buildings, public spaces and routes are positioned according to their function, importance and use. There is a strong emphasis upon improving opportunities for sustainable modes of travel by enhancing connections, routes and green infrastructure. Furthermore, all new development must be attractive, safe and fully accessible and inclusive for all.

Site Layout

78. London Plan Policy D3 requires developments to make the most efficient use of land to optimise density, using an assessment of site context and a design-led approach to determine site capacity. This design led approach is also reflected in Southwark Plan Policy P18. In respect of site layout and public realm Southwark Plan Policy P13 requires developments to ensure that the urban grain and site layout take account of and improve existing patterns of development and movement, permeability and street widths; to ensure that buildings, public spaces, open spaces and routes are positioned according to their function, importance and use to ensure that a high quality public realm that encourages walking and cycling is safe, legible, and attractive is secured. *The detailed design of all areas of public realm must be accessible and inclusive for all ages and people with disabilities as well as providing opportunities for formal and informal play and adequate outdoor seating for residents and visitors.*
79. The proposed layout of the site would comprise of one urban block to the north of the site with a 2 storey commercial podium, 9 storey shoulder fronting Ilderton Road and a tower block at the north-eastern edge of the site adjacent to the railway viaduct. The block typology aligns with the rectilinear nature of the site. The proposed tower block is articulated into two separate massing's reaching 25 storeys at the north and stepping down to 23 storeys to the south. This articulation reduces the bulk of overall perceived massing. The 9 storey shoulder block provides a transition in scale to the frontage along Ilderton Road and will be in line with the shoulder height of emerging neighbouring development along Ilderton Road.
80. The proposed layout improves the relationship with surrounding streets providing increased active frontages. Residential entrances are setback from the north-western corner of the site onto Ilderton Road and Surrey Canal Road. Significant increases to the width of the pathway at this junction improves the public realm and pedestrian permeability, located in close proximity to pedestrian crossings and residential entrances. Improvements to the streetscape include the widening of the pavement along Ilderton Road to 3.8m with the integration of planting as a buffer between the highway and pedestrians. This also enhances the public realm as well as commercial and residential entrances areas including double height entrance lobby spaces.
81. The proposed typology re-locates the Jewson warehouse and shop into the podium of the development with continued use of the working yard. Separate access routes are proposed to manage the reconciliation of uses, with a proposed residential access and

servicing situated to the north from Surrey Canal Road, and retention of the yard access to Jewson's from Rollins Street to the south of the site. The constraints of the site do not allow for a shared access between residential and industrial uses, due to safety concerns with pedestrians and a constrained site and the need to keep the Jewson operation separate from the residential. To the rear of the site is the residential loading bay which will be accessed in a controlled manner from Surrey Canal Road.

Height Scale and Massing (including consideration of Tall Buildings)

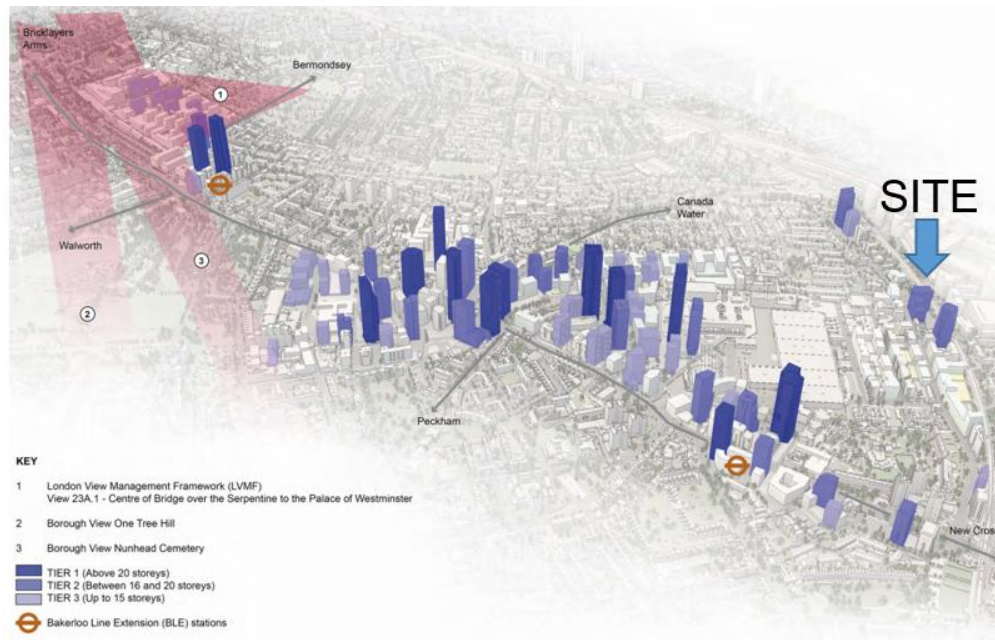
Image: The development, viewed from Ilderton Road looking southbound



82. London Plan Policy D9 provides policy requirements for tall buildings. The policy sets out a list of criteria against which to assess the impact of a proposed tall building (location/visual/functional/environment/cumulative). London Plan Policy D4 requires that all proposals exceeding 30 metres in height and 350 units per hectare must have undergone at least one design review or demonstrate that they have undergone a local borough process of design scrutiny.
83. Southwark Plan Policy P17 deals with tall buildings. The policy identifies this site as suitable for tall buildings as it is located within the Old Kent Road opportunity core area. The policy sets out a list of requirements for tall buildings of which the policy states that tall buildings must:
 1. Be located at a point of landmark significance; and
 2. Have a height that is proportionate to the significance of the proposed location and the size of the site; and
 3. Make a positive contribution to the London skyline and landscape, taking into account the cumulative effect of existing tall buildings and emerging proposals for tall buildings; and

4. Not cause a harmful impact on strategic views, as set out in the London View Management Framework, or to our Borough views; and
 5. Respond positively to local character and townscape; and
 6. Provide a functional public space that is appropriate to the height and size of the proposed building; and
 7. Provide a new publicly accessible space at or near to the top of the building and communal facilities for users and residents where appropriate.
84. Policy 8 of the Draft OKR AAP sets out a tall building strategy with the 'Stations and Crossings' reinforcing the proposed hierarchy of buildings. The three tier strategy defines a clear building height strategy across the opportunity area. 'Tier One' buildings represent developments that exceed 20 storey's in height. These developments are proposed to be sited in the vicinity of the proposed BLE stations, to mark their city wide significance and optimise the use of land in the most accessible locations. Mid height 'Tier Two' buildings proposes building heights within the range of 16 to 20 storeys to mark places of local importance to help define their character and assist wayfinding. 'Tier Three' tall buildings up to 15 storey's will act as markers within the neighbourhood. The strategic locations of Tier One and Tier Three buildings assist in wayfinding and markers at a junction.
85. The policy states that the design of buildings should carefully consider their impact on the skyline and their relationships with the surrounding context, be of exemplary design and provide high residential quality where new homes are provided. The site is identified within the OKR AAP as having scope to provide a taller Tier 2 building given its location at the important junction between Ilderton Road and Surrey Canal Road. In the 2017 draft AAP tier 2 buildings were defined as being up to 25 storeys and it was on that basis that pre application discussions began in 2019. Given that context and the public benefits of the scheme it is therefore considered that the tallest part of the building is line with ambitions for the site contained within the OKR AAP.

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



86. This mixed use development forms a single urban block composed of a variety of strata; a 2 storey industrial podium that stretches across the majority of the urban plot with a 9 storey shoulder block and a 23/25 storey tower block located at the north eastern edge of the site forming the upper residential uses. The proposed shoulder block is considered to provide an appropriately scaled frontage onto Ilderton Road, responding to the surrounding context. A vertical tower is located to the north eastern edge of the site by the railway track reaching 25 storeys at its highest point and 23 storeys at its lowest. The massing of the tower is reduced through articulation of the urban form, mimicking an H shaped block, with central intrusions. A step down in height to the south of the site has a slight reduction in the overall scale as perceived from the courtyard space. This articulation of the East and West elevations contributes to reducing the perceived bulk from these views. While the massing and height of the proposal contrasts with the low-rise buildings adjacent to the site, it does not conflict with the prevailing pattern of development within the wider planned context. The proposal is considered to be in line with the tall building strategy outlined in the AAP and Policy P17 in the Southwark Plan.
87. The proposal provides a sophisticated transition in scales to form a frontage along Ilderton Road and provides articulation to the massing of the development. Building frontages have been generously set back from the edge of the urban plot to create an increased public realm with the provision of landscaping and planters along the pathway. At the north-western corner residential entrances have been recessed to provide an improved public realm, and provides positive inviting entrances for residents, with a 2 storey lobby entrance. The proposed podium has been designed to give a strong street presence along Ilderton Road, increasing active frontages and providing entrances to both residential and commercial uses, from the primary road.
88. The design of the urban block takes into account the base, middle and top principles, providing articulation across the facades and block. Providing interest for immediate, mid-range and longer views as identified in the London Plan 2021. The railway line

provides a physical barrier between the boroughs of Southwark and Lewisham. The tower will improve urban legibility, positioned along the eastern edge of the railway viaduct at the junction of borough boundary. The composition of the tower is expressed in a bricked verticality, with a clear grid order which is resumed on the shoulder block. Deep reveals and recessed balcony corners accentuate architectural interest. The scale and robust quality of the brick columns relate to the industrial character of the area and the adjacent railway arches.

89. The two storey base was established along Ilderton Road to allow for a distinct language of the commercial element, and to improve the relationship of the proposed development with adjacent terraces. Large cut-out setback adds to the public realm and wraps around the north western corner of the building. Whilst providing visual emphasise of residential entrances, establishing a street presence along Ilderton Road. The urban block has been setback to provide sufficient streetscape, pavement space and appropriate landscaping for the development. Improvements have been made at the 'knuckle' of the site to provide increased public realm, reaching around 7m at residential entrances, providing a positive grounding to the development. Ground floor glazing provides visual connection to the internal builders yard functions creating mproved pedestrian access and active frontages to the existing Jewson's uses along Ilderton Road.
90. In line with the draft OKR AAP, the design of the tall buildings would be exemplary, with careful consideration of their impact on the skyline. For the reasons set out above it is considered that the proposal accords with Policy P17 in terms of the principal requirements for tall buildings as well as Policy 8 of the Old Kent Road Area Action Plan. Additionally, this application was accompanied by a Heritage, Townscape and Visual Impact Assessment. The impact on protected views and heritage assets is discussed in the relevant section of this report.

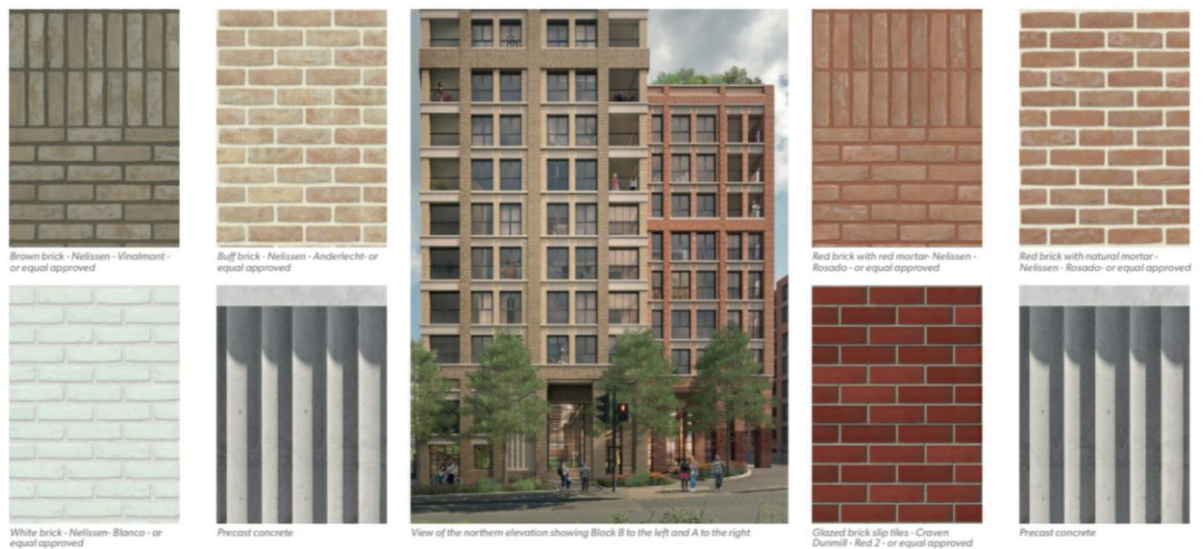
Architectural Design and Materiality

91. Southwark Plan Policy P14 sets out the criteria for securing high quality design. In respect of architectural design and materials the policy requires all developments to demonstrate high standards of design including building fabric, function and composition; presenting design solutions that are specific to the site's historic context, topography and constraints; responding positively to the context using durable, quality materials which are constructed and designed sustainably to adapt to the impacts of climate change.
92. The use of different materials on each block provides architectural interest and further defines the articulation of the massing whilst providing separation between the uses. The proposal will be viewed as a cluster of buildings rather than an overwhelming mass of development. Further articulation was provided to the Tower following earlier advice and it is now considered that a positive design outcome has been reached. The difference between the two taller elements provides visual interest and articulation between the forms.
93. The glazed red tile finish of the shoulder block provides an appropriate finish that fronts the public realm, whilst also demarcating the commercial areas of the development.

The architectural language of the development provides a strong robust appearance that reflects the emerging and existing character of the area.

94. The high quality architecture is considered to enhance the existing appearance of the subject site whilst referencing the surrounding context. Submitted details ensure that there would be depth and articulation to facades of the development. This level of detail will be secured through the inclusion of conditions in order to ensure that this level of design quality is maintained in the construction of the proposal. These conditions have been attached to the decision notice.

Image: Materiality palette



Landscaping

95. Policy P59 of the Southwark Plan (Green infrastructure) states that major developments that are referable to the Mayor of London must provide new publically accessible open space and green links. Additionally, developments should provide multiple benefits for the health of people and wildlife, and to integrate with the wider green infrastructure network and townscape / landscape, increasing access for people and habitat connectivity. Point 3 of London Plan Policy G1 (Green Infrastructure) requires Development Plans and Opportunity Area Planning Frameworks should identify key green infrastructure assets, their function and their potential function. They should also identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.
96. An indicative landscaping strategy is proposed for the site which outlines a high-quality approach towards hard and soft landscaping throughout. Extensive and appropriate planting and landscaping in the communal amenity areas and on the site boundaries has been incorporated into the design to indirectly connect and enhance the Senegal Railway Banks SINC on the eastern boundary of the site.

Image: Landscape proposals podium level

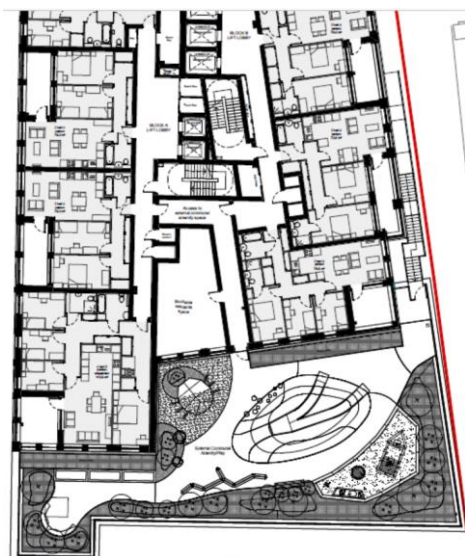


Image: Landscape proposals 8th floor



97. Overall, the landscape proposals are considered to be a significantly positive aspect of the redevelopment of the subject site. All plans are indicative with detailed landscape plans involving hard and soft features being subject to conditions which are attached to the decision notice. The hard and soft landscaping condition will require appropriate buffering to units fronting onto the communal amenity spaces proposed within the development.

98. With regards to the proposed Green Wall within the amenity space, the submitted fire safety statement addresses aspects of external fire spread by stating that external walls will be class A2-s1, d0 or better. In addition, the climbers are growing on the pergola on the 8th floor roof garden and not on the building facade which is effectively integrated into the wider landscape proposals. The statement demonstrates that the external walls should be either of limited combustibility or non-combustible and no objections are raised to the incorporation of the Green Wall into the proposals. A condition will require details of the green wall planting to be submitted including confirmation that it is of a non-combustible nature.
99. The security of future residents has also been considered, with lighting arranged around the external amenity areas. The lighting is of a low level and has been strategically placed so that there are no hidden corners within the amenity spaces. A lighting strategy is secured by condition and attached to the decision notice.

Ecology

100. An Ecological Appraisal (PEA) has been prepared by Tyler Grange dated December 2021. The EA has identified habitats that are present on site are of negligible ecological value and require no specific mitigation for their removal. The nearest designated site is the Senegal Railway Banks SINC, which abuts the eastern boundary of the subject site. Shading from the tower is anticipated to affect the northern most tip of the SINC only, and only for small proportion of the day (from mid-late afternoon onwards). It is considered that the proposals do not present any negative direct impacts on the statutory designated site, as the site is already subject to high levels of disturbance and as its flora is dominated by shade tolerant and intermediate shade tolerant species.
101. As part of the Construction Environmental Management Plan (CEMP) that will need to be produced prior to construction taking place, the CEMP should be produced to manage construction activities and prevent any adverse effect on the SINC.
102. During consultation with the council's Ecologist, bird and bat boxes have now been positioned higher on the building and are positioned between 3m and 6m above ground under the parapet, but above the windows. Overall, the ecological proposals for the site raises no objection from Southwark's Ecologist. Recommended conditions have been attached to this decision to ensure compliance.

Urban Greening Factor

103. Policy G5 of the London Plan 2021 encourages major developments to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. The policy also recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for commercial sites.

Image: Urban Greening Factor score

Urban Greening Factor Calculator				
Surface Cover Type	Factor	Area (m ²)	Contribution	Notes
Semi-natural vegetation (e.g. trees, woodland, species-rich grassland) maintained or established on site.	1	0	0	
Wetland or open water (semi-natural; not chlorinated) maintained or established on site.	1	0	0	
Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm.	0.8	491.38	393.104	
Standard trees planted in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree.	0.8	287.54	230.032	
Extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) – meets the requirements of GRO Code 2014.	0.7	343.73	240.611	
Flower-rich perennial planting.	0.7	35.33	24.731	
Rain gardens and other vegetated sustainable drainage elements.	0.7	109.53	76.671	
Hedges (line of mature shrubs one or two shrubs wide).	0.6	0	0	
Standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree.	0.6	0	0	
Green wall –modular system or climbers rooted in soil.	0.6	29.53	17.718	70% coverage of pergola
Groundcover planting.	0.5	0	0	
Amenity grassland (species-poor, regularly mown lawn).	0.4	0	0	
Extensive green roof of sedum mat or other lightweight systems that do not meet GRO Code 2014.	0.3	0	0	
Water features (chlorinated) or unplanted detention basins.	0.2	0	0	
Permeable paving.	0.1	935.17	93.517	
Sealed surfaces (e.g. concrete, asphalt, waterproofing, stone).	0	0	0	
Total contribution			1076.384	
Total site area (m²)				2513.71
Urban Greening Factor				0.428205322

104. Given the operational requirements for a builders merchants such as Jewson, the external yard area cannot be landscaped. The nature of the working builders merchant yard requires that sufficient space is provided for vehicular turning, torque, and working access. Therefore, in this instance, the substantial area of external yard space within the site is essential to the operational requirements for Jewson and is not included in the UGF calculations for the development.
105. Given the above paragraph, the total site area within the development for UGF values is 2,512M², which is formed from the residential building area including public realm, communal amenity and biodiverse roofs. The UGF score would amount to 0.42, which is an increase on the guidance target within the London Plan.

Trees

106. London Plan Policies (G1 & G7) and Southwark Plan Policy P61 require that wherever possible, existing trees of value are retained.
107. There are four existing trees on the Surrey Canal Road frontage of the subject site. As part of the comprehensive redevelopment of the site, these existing trees are to be removed. The four trees fall under Category B and C and are required to be removed to enable the development. In their place, six trees are to be planted along the Surrey Canal Road frontage with the replacement trees considered to have greater physical and visual value.
108. Point 4 contained within P61 of Southwark Plan states that where trees are removed to facilitate development, they should be replaced by new trees which result in no net loss of amenity, taking into account canopy cover as measured by stem girth; either
1. Within the development whereby valuation may be calculated using the (CAVAT) methodology or other assessment; or
 2. If this is not possible, outside the development. In this case a financial contribution must be provided to improve borough tree planting located according to 'right tree right

place' principles. The financial contribution will include ongoing maintenance costs where trees are planted in the public realm.

109. The scheme provides acceptable replacement trees at street level suitable to site and species. The trees which are to be removed are Category B and C trees and are of a size such that 5 x 20-25cm /25-30cm replacements would ensure a continuity of canopy cover and amenity. Together with the proposed podium planting there is no net loss in canopy cover as measured by stem girth and so the onsite mitigation strategy is fully compliant with Policy P61 of the Southwark Plan 2022.
110. At podium level, the species palette is welcomed. The applicant suggests a soil depth of 850cm, which is on the lower limits for tree establishment and a minimum of 3.5m available soil would be required for each of the trees. In total 21 trees are proposed and their establishment, replacement and care, along with other soft landscaping elements would need to be conditioned for the longevity of the building. These conditions are attached to the decision notice.

Design Review Panel

1st Design Review Panel - Spring 2021

111. The proposal was subject to the Design Review Panel (DRP) during spring of 2021. The response from the DRP was generally favourable, although some key issues were identified. These are discussed below.
112. The Panel raised concerns over the commercial workspace along Ilderton Road and its poor relationship with the street as it rises above the plant spaces. Additionally, the Panel thought that the residential drop-off area was insufficient, and that the commercial entrances lack distinction.
113. Officer comment: Following the comments received, the commercial space along Ilderton Road was lowered to pavement level along its length so provide a stronger connection with the street level that assists in activating the development along Ilderton Road. In light of the DRP comments, the residential drop-off area was expanded to increase capacity of delivery vehicles, and the entrance to the commercial unit from Ilderton Road was redesigned to give the unit a setback covered entrance.
114. The Panel thought that the scheme was too tall, and that the taller building has a lack of variety and articulation.
115. Officer comment: Following concerns of the height, the tower block was reduced down from 28 storeys to 25, with the shoulder block dropping from 14 storeys to 9 storeys fronting onto Ilderton Road. This shoulder height reflects the heights of the developments adjacent at 60A and 62 Hatcham/134-140 Ilderton Road, and 180 Ilderton Road. Additionally, the scheme is now lower than the 28-storey tower approved as part of the Leathams redevelopment at 227-255 Ilderton Road immediately to the south of the subject site. Regarding the lack of variety and articulation the tower was refined and broken into two portions that break the buildings into smaller forms with their own distinctive character.

2nd Design Review Panel – Autumn 2021

116. The revised scheme was subject to a second round at the Design Review Panel scrutiny in Autumn 2021. The overall response was from the DRP was positive with articulation and character incorporated into the reduced massing of the development.
117. The Panel felt that whilst the reduced height of the tower provided a more appropriate massing, the tower does not finish with enough celebration. Additionally, the Panel thought that the 'knuckle corner' of Ilderton Road and Surrey Canal Road felt tight.
118. Officer comment: The scheme has a brick framing to the northern portion of the tower which was re-proportioned to give a greater emphasis to the top of the building. A secondary framing 'crown' was added to the southern portion of the Block B tower to create a distinctive top when viewed from the south. Regarding the corner knuckle, the area around the commercial and residential entrances was redesigned to provide additional pavement width and create a better public space between the two pedestrian crossings.
119. The Panel also raised a query over the commercial frontage not being differentiated from the residential entrances, and that the connections between the cycle and storage area with the lobbies was not clear.
120. Officer comment: To differentiate the commercial frontage from residential entrances within the scheme, the use of glazed brick slip tiles along the commercial frontage with rounded corners was introduced to highlight the commercial areas and create an engaging materiality along the pedestrian realm of Ilderton Road. For the relationship between the lobbies and the cycle and refuse storage, internal levels changes were reduced to create a simpler internal arrangement.

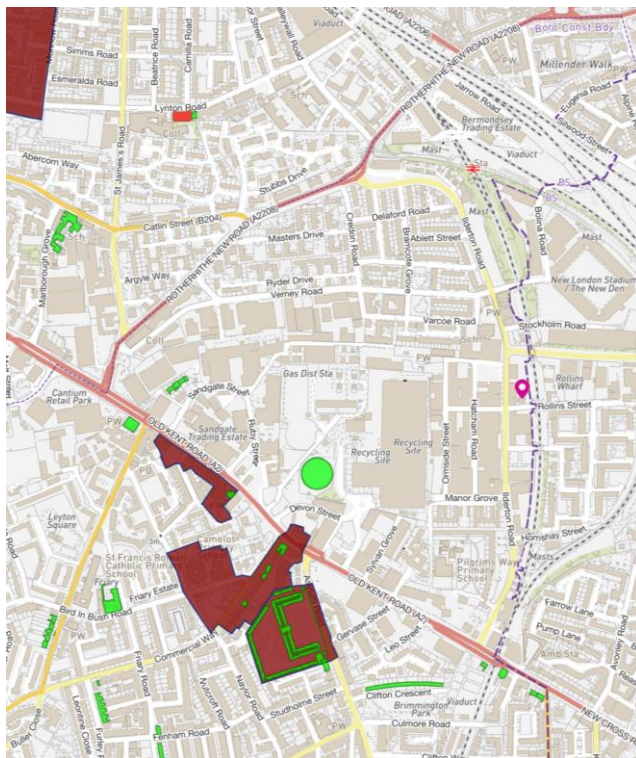
HERITAGE AND TOWNSCAPE CONSIDERATIONS

121. 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

122. The subject site is not located within the boundaries of a conservation area, nor is it a listed building. The closest conservation area is Kentish Drovers and Bird in Bush, located approximately 550 metres southwest of the subject site. Designated heritage assets within 500 metres of the site is limited to Grade II listed Gasholder no. 13 which is located approximately 430 metres southwest of the subject site.

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



Draft OKR APP and Draft Local List

123. Although of limited weight, the draft OKR AAP also identifies buildings and features of townscape merit and buildings of architectural or historic interest. These buildings are also included on the draft Local List published by the Council in March 2018. The following are within or immediately adjacent to the application site:

Table: Draft AAP Building or Feature of Townscape Merit within the immediate vicinity of the site:

Property	Description
209-225 Ilderton Road	Building of Townscape Merit
Penarth Centre, 30 Penarth Street	Building of Townscape Merit
Christ the King Chapel, 8 Manor Grove	Building of Townscape Merit

Townscape and Visual Impact Assessment (TVIA)

124. BWB has submitted a Townscape and Visual Impact Assessment (TVIA) as part of this application. The study area for the TVIA is taken to be a 2km radius from the site and has been informed by the Zone of Theoretical Visibility (ZTV). The effects on settings of heritage assets or ecological/ environmental assets will not be assessed within this TVIA, although effects on built landmarks are considered if they contribute to townscape character. Effects on Conservation Areas and Listed Buildings are considered in terms of impact on present day users and residents in addition to townscape effects.
125. The scale of the townscape and visual effects is determined by considering both the sensitivity of the townscape feature, townscape character or view with the magnitude of change. The scale of effects is described as neutral, very low, low, medium, or high. The following table provides a breakdown of how the effects are assessed and rated.

Table: Magnitude of change to views

Magnitude	Criteria
Neutral	No discernible change to townscape character arising from the development. Development is wholly compatible with existing townscape. No enhancements incorporated, so effect is neutral.
Very low – adverse or beneficial	There is a barely discernible change to aesthetic and/or perceptual attributes of townscape character and such changes occurs across a very limited geographical area and/or proportion of the townscape receptor. These may be either adverse or beneficial, such as slight design differences between established townscape and proposals. The effects are of short duration and reversible.
Low – adverse or beneficial	Adverse - Townscape features and elements of importance to the character of the baseline are lost over the site area and immediate surroundings and can be wholly restored or replaced. Beneficial – a localised improvement in features and elements at the site level and immediate surroundings. Adverse – minor aesthetic changes in townscape character come about. The Proposed Development is a minor new feature. Beneficial – minor improvements to townscape aesthetics (design or hard and soft landscape enhancements, at the site level and immediately adjacent to the site. The effects may be of short to medium duration and reversible.
Medium – adverse or beneficial	Adverse - Townscape features and elements of importance to the character of the baseline are lost over a limited area and can be partly restored or replaced. Beneficial – a localised improvement in townscape character Aesthetic and/or perceptual attributes of townscape character are affected to the extent that the Proposed Development becomes a noticeable new feature but does not compete with other aspects. This

	<p>may be evaluated as either adverse or beneficial, depending on the nature of the change.</p> <p>The change to aesthetic/perceptual aspects occurs across a moderate geographical area and/or proportion of the townscape receptor.</p> <p>The effects are of medium to long duration and reversible</p>
High – adverse or beneficial	<p>Adverse - Loss or irreparable damage to townscape features and elements over a wide area and/or of key importance to the character of the baseline.</p> <p>Beneficial – wide scale improvements to townscape character that has been established to be in need of improvement.</p> <p>Aesthetic and/or perceptual aspects of townscape character are affected such that the Proposed Development becomes a key additional aspect and competes with other aspects. This may be either adverse or beneficial, depending on the baseline condition of the landscape and what is being proposed.</p> <p>The effects are of long duration and/or irreversible.</p>

126. There are nine viewpoints within a 2 kilometre radius conducted as part of the TVIA assessment. The table below provides detail on the distance of the viewpoint to the development site, potential receptors, the value of the view, the susceptibility of the view, and the sensitivity of the viewpoint. The table below has omitted viewpoint 9 from the assessment as this is taken from Parliament Hill, and that specific viewpoint is discussed further below under the London View Management Framework section.

Image: Viewpoint locations

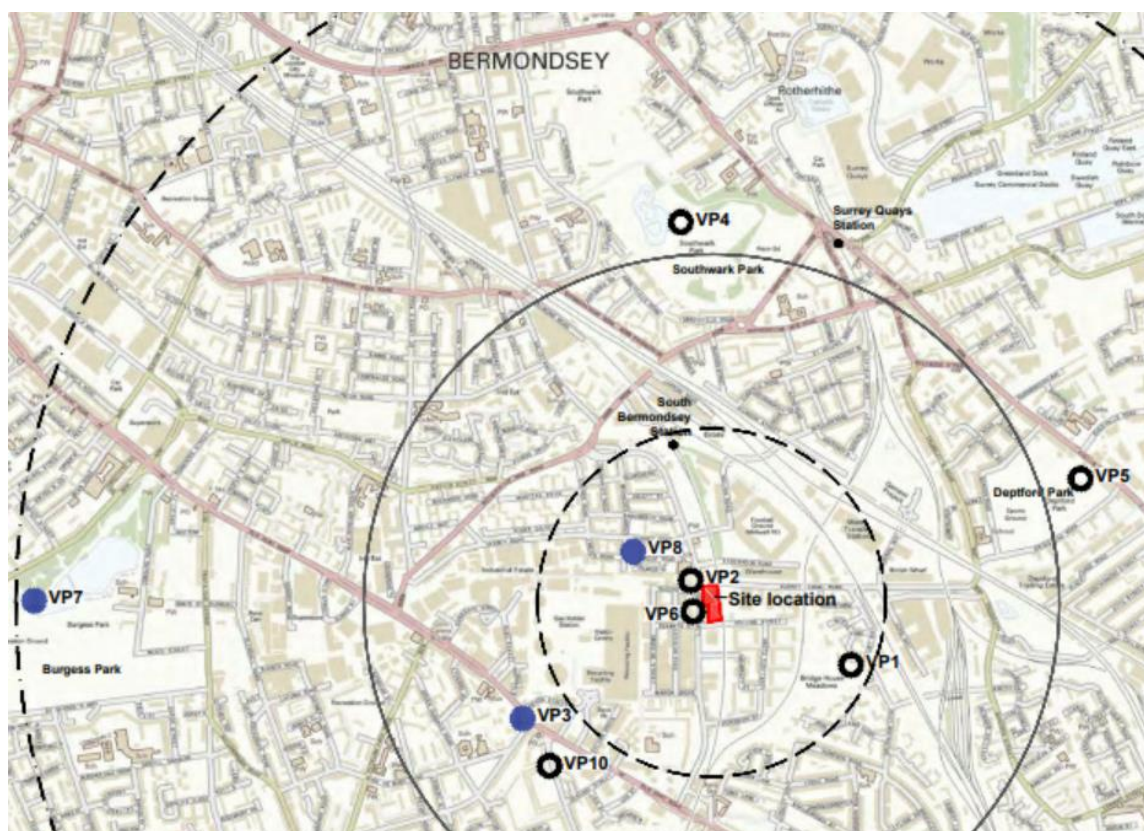


Table: Viewpoint assessment

<u>Viewpoint and Location</u>	<u>Distance to site boundary</u>	<u>Receptors</u>	<u>Value (Of view)</u>	<u>Susceptibility to change</u>	<u>Sensitivity</u>
1. Bridgehouse Meadows	0.31km	-Recreational users of Public Open Space -Cyclists -Pedestrians	Medium	Low/Medium	Low
2. Ilderton Road junction with Surrey Canal Road	24m	-Pedestrians -Road users	Low	Medium beneficial	Low

3. Old Kent Road junction with Commercial Way	0.59km	-Residents -Pedestrian -Road users	Low	Neutral	Very low
4. Southwark Park (adjacent to the Pond)	1.03km	-Recreational users of Public Open Space -Pedestrians -Cyclists	Medium	Neutral	Low
5. Deptford Park	1.06km	-Recreational users of Public Open Space -Pedestrians -Cyclists	Medium	Neutral	Low
6. Ilderton Road opposite no.212	15m	Pedestrians Road users	Very low	Neutral	Very low
7. Burgess Park (At Picnic Area)	1.9km	-Recreational users of Public Open Space -Pedestrians -Cyclists	Medium	Neutral	Low
8. Bramcote Park, Varcoe Road	0.22km	-Residents -Recreational users of Public Open Space -Pedestrians -Road users	Low	Medium	Medium

10. Asylum Road	0.6km	-Residents -Pedestrians -Road users	Very low	Very low	Very low
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127. The assessment of all nine viewpoints indicates that, while the proposed development will introduce change to the subject site and its locality, such change can be accommodated without unacceptable effects on townscape character and visual amenity. While the massing and height of the building contrasts with the mainly low-rise buildings of the surrounding area, it does not conflict with the prevailing pattern of other existing or proposed developments within the wider context of OKR16 and the OKROA.

London View Management Framework

128. A number of strategic views as defined in the London View Management Framework (LVMF) (March 2012), are panoramic viewpoints located in north London. The viewsplay takes in a wide panorama of the city centre and Southwark forms a distant backdrop to these views. The views identified in the LVMF are; Alexandra Palace, Parliament Hill, Kenwood, and Primrose Hill.
129. The viewpoints mentioned above are all located at a distance of 9 kilometres and more from the subject site. The changes to the visual character of the townscape and views resulting from the proposed development of this scale and distance is not going to be discernible in the backdrop to the City and are at such a distance they have no bearing on the silhouette of key City landmarks, blending into the general urban context.

Strategic Borough Views - Southwark

130. The site is not in any Borough views.

Image: Southwark Strategic Borough Views (Subject site highlighted in red)



Conclusion on the Setting of Listed Buildings, Conservation Areas and Townscape

131. The following table summarises the designated heritage assets that could be impacted by the proposal, and what harm, if any has been identified.

Table: Impact on heritage significance

Listed Buildings and Conservation Areas	Assessment of Impact on heritage significance
LVMF Views	No harm identified
Local Views	No harm identified
Kentish Drovers and Bird In Bush Conservation Area	No harm identified
Listed Buildings	No harm identified owing to the height, distance and relationship of the development from nearby assets
Draft Locally listed buildings/ undesignated assets identified in the draft Old Kent Road AAP	No harm identified.

132. In conclusion, the proposed development would not have a significant impact on the views assessed despite it being a highly visible feature in the immediate townscape. Given the substantial distance to nearby heritage assets, and taking into consideration the height of the development, the scheme is considered to be a beneficial addition to the London Skyline that would successfully integrate into the immediate area and would not cause harm to any of the heritage assets listed above.
133. Whilst limited weight has been given to emerging policy, full weight has been given to adopted policies, including the NPPF (2021), London Plan (2021) and Southwark Plan (2022). As can be seen from the assessment contained within this report, the development is considered to be in compliance with these adopted policies.

HOUSING MIX, DENSITY AND RESIDENTIAL QUALITY

Housing Mix

134. Southwark Plan Policy P2 seeks to ensure that a minimum of 20% of family homes with three or more bedrooms are provided in the Action Area Cores (which would apply to this Old Kent Road site) and a minimum of 25% of homes with three or more bedrooms are provided in the urban zone. The policy also requires two bedroom homes as a mix of two bedroom 3 person and two bedroom 4 person homes. The housing mix requirements are replicated in the draft OKR AAP (Policy 4).
135. Policy H10 of the London Plan relates to housing size and mix; it seeks to guide borough and developers on unit mix within new residential developments, and states that schemes should generally consist of a range of unit sizes having regard to robust local evidence, the requirement to deliver mixed and inclusive neighbourhoods and the range of tenures in the scheme.

Table – Housing Mix:

<u>Dwelling size</u>	<u>No. of units</u>	<u>Percentage</u>
1 Bedroom	53	31.18%
2 Bedrooms	82	48.23%
3 Bedrooms	21	12.36%
4 Bedrooms	14	8.23%
Total	170	100%

136. The table above demonstrates that the development would provide 68.82% of the new units as two or more bedrooms. In addition, 20.59% of units would be family homes with three or more bedrooms. This meets the percentage required for Action Area Cores. In addition following discussions with the applicant the scheme also benefits

from the inclusion of all 14 four bedroom homes forming part of the social rent provision within the development.

Wheelchair Housing

137. Policy P8 of the Southwark Plan requires at least 10% of the dwellings, by habitable rooms, across the subject site to meet Building Regulation M4(3) 'wheelchair user dwellings' (with 10% of the social rented homes meeting Building Regulation M4(3)(2)(b) 'wheelchair accessible dwellings' as thus available for immediate occupation). All other dwellings will be delivered to meet M4(2) 'accessible and adaptable dwellings' standards.
138. 16 units within the scheme of the proposed new homes would meet Building Regulations Part M4(3)(2)(a) 'wheelchair adaptable', which equates to 10.5% of all dwellings by habitable rooms. The wheelchair user dwellings would be secured through the Section 106 Legal Agreement.

Density

139. The Southwark Plan does not contain specific density matrices and ranges for different areas of the borough. Instead, it sets out a range of criteria relating to good design and appropriate density in the context of a site-specific approach, including in policies P13 Design of places, P14 Design quality, P15 Residential design and P18 Efficient use of land. Criteria across these policies require among other things that:
- 140.
- Development's height, scale, massing and arrangement responds positively to the existing townscape, character and context;
 - Buildings, public spaces and routes are positioned according to their function, importance and use within the townscape;
 - Adequate daylight, sunlight, outlook and a comfortable microclimate is accommodated for future and existing occupiers
 - Development provides a high standard of residential design quality
 - Development optimises the use of land and does not unreasonably compromise development potential on neighbouring sites
141. This approach is consistent with the London Plan, within which policy D3 refers to optimising site capacity through a design led approach. The quality of the proposed units, the acceptability of the height and massing, the architecture, the townscape impacts, the neighbour amenity impacts and transport implications are set out in detail in the relevant sections of this report.

Quality of Residential Accommodation

142. London Plan Policy D6 (Housing quality and standards) states that housing developments should be of high quality and provide adequately-sized rooms, with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners. The policy sets out a range of qualitative design aspects for housing developments relating to dwelling size, aspect, daylight, layout and amenity space. Policy P15 Residential design of the Southwark Plan sets out that development must

achieve an exemplary standard of residential design and must take into consideration the site context, the impact on the amenity of adjoining occupiers, and the quality of accommodation.

Unit Size

143. Policy P15 of the Southwark Plan requires developments to meet the minimum national space standard. All of the units would comfortably meet or exceed the minimum total GIA space requirements set out in the nationally described space standards and as set out in the 2015 Technical Update to the Residential Design Standards SPD. The larger units consisting of 4 bedrooms are particularly sizable which when taking into account their likely occupation by a family, is a very positive aspect of the scheme.
144. All proposed homes would exceed the minimum standard of one, two, three, and four bedroom units, in accordance with the minimum space standards as per Table 3.1 of Policy H6 of the London Plan. The following tables provide a breakdown of the range of unit sizes contained within the development.

Table: Proposed flat sizes

Unit Type	SPD Requirement (sqm)	Size range proposed (sqm)
1 Bed 2 Person (flat)	50sqm	50 – 54.4sqm
1 Bed 2 Person (WCH)	65sqm	67.5sqm
2 Bed 4 Person (flat)	70sqm	70 – 74.4sqm
3 Bed 4 Person (flat)	74sqm	76.6 – 77.4sqm
3 Bed 5 Person (flat)	86sqm	91.3sqm
4 Bed 5 Person (flat)	90sqm	92.9sqm
4 Bed 5 Person (WCH)	110sqm	113.9sqm

145. The above table demonstrates that the development has successfully designed the layout of each floor to accommodate each bedroom type without compromising the quality of accommodation. Layouts of the flats are well proportioned with no hidden corners with an emphasis of ease of movement and circulation within each flat. Furthermore, each apartment prioritises placing the open plan living / kitchen / dining room to the front facade of the building to maximise potential for natural daylighting and views. Overall, it is therefore considered that the size and layouts of the units are acceptable, and would provide a good quality of accommodation.

Internal Daylight and Sunlight

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

Overlooking and Privacy within the Proposed Development

147. The unit most at risk of potential overlooking and loss of privacy within the development is the 3 bed 4 person unit in Block B, and the 4 bed 5 person WCH unit in Block A, of which both abut the first floor communal amenity space. Submitted plans demonstrate that privacy buffers will be created to mitigate against any potential overlooking or loss of privacy from within the development. In addition, the two units in Block B, 1 bed 2 person, and 2 bed 3 person, which abut the communal spaces provided on the eighth floor terrace do not show privacy buffers in the submitted drawings; however, details of the privacy buffers for all potentially affected units will be secured within the hard and soft landscaping condition attached to this decision notice.

Number of Units Per Core

148. The design of the development has been split into two blocks; Block A, and Block B. Block A accommodates the social rent aspect of the development, with Block B providing the intermediate and private sale units. In order to maximise dual aspect units across the floor area, Block A provides a mix between 2 and 5 cores per floor, and Block B provides a mix of 5 and 6 cores per floor. The centralised location of the lift enables smaller the development to avoid long corridors on each floor. The number of units per core means that the development provides 58% of the units as dual aspect units.

Secured by Design

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

Conclusion on Quality of Accommodation

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

OUTDOOR AMENITY SPACE, PLAY SPACE AND PUBLIC OPEN SPACE

151. All new residential development must provide an adequate amount of useable outdoor amenity space. The Residential Design Standards SPD sets out the required amenity space standards which can take the form of private gardens and balconies, shared

terraces and roof gardens. Policy S4 of the London Plan requires new developments to make provision for play areas based on the expected child population of the development. Children's play areas should be provided at a rate of 10sqm per child bed space (covering a range of age groups). In addition, P15 of the Southwark Plan requires the provision of 5sqm of public open space per dwelling.

152. Four categories of open space are required in major planning applications in the Old Kent Road Opportunity Area:
- Private amenity space: For units containing three or more bedrooms, 10sqm of private amenity space as required by the SPD; and for units containing two bedrooms or less, ideally 10sqm of private amenity space, with the balance added to the communal space;
 - Communal amenity space: 50sqm communal amenity space per development as required by the SPD; and
 - Children's play space: 10sqm of children's play space for every child space in the development as required by the London Plan.
 - Public open space: 5sqm of public open space per dwelling as required by the draft OKR AAP. If it is not feasible to deliver the open space on site, a financial contribution will be required.

Private Outdoor Amenity Space

153. All of the proposed homes have been provided with private amenity space in the form of either; private balconies, or private winter gardens. The majority of homes have been designed to have at least 10sqm of private amenity space, which is a very positive aspect of the scheme, with the shortfall from each private amenity area included in the communal amenity space of the development.
154. The total amount of private amenity space proposed within the development is 1,603.40sqm. This results in a relatively small shortfall of 96.6sqm that is to be included in the provision of communal amenity space within the scheme.

Communal Amenity Space

155. In order to comply with the requirements of the Residential Design Standards SPD, 50sqm communal amenity space per development should be provided. This should be provided in addition to the requirement to compensate for any shortfall in private amenity space.
156. As stated in the private amenity space consideration above, the shortfall of the private amenity has been included into the communal amenity requirement for this development. The scheme provides two communal amenity areas; one on the first floor terrace, and the other on the eighth floor terrace. Both spaces are south facing and are served by stair cores and available for use by all residents.
157. The following table summarises the communal amenity space requirements, against that proposed. All the podium and terrace communal amenity spaces would be accessible to all residents.

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

Communal amenity space proposed	Proposal	Shortfall
(Shared roof or terrace space)	193sqm Required 96.6sqm +50sqm = 146.6sqm	No shortfall (46.4sqm over provision)

158. As demonstrated in the tables above, the provision of private and communal amenity space would meet and exceed the design guidance requirements.

Children's Playspace

159. The child yield for the development has been calculated using the 'Providing for Children and Young People's Play and Informal Recreation' published as SPG in 2012 by the GLA using the GLA Population Yield Calculator (version 3.2).
160. The Mayor's SPG sets out the intended strategic approach to delivering new and enhanced play space both on and off-site in new developments. It explains that 'doorstep' play (Under 5s) should usually be provided on-site, unless there is existing provision within 100 metres. For 5-11 year olds and children over 12 years old, it recommends that off-site provision is acceptable, if there is existing provision within 100-400 metres and 400-800 metres respectively. This is summarised in Table 4.5 of the SPG, reproduced below.

Table 4.5 of the Mayor's Providing for Children and Young People's Play and Informal Recreation SPG

Table 4.5 Provision of play space to meet the needs of new development

		Under 5s	5-11	12+
Existing provision	within 100 m	On site or off-site contribution	Off-site contribution	Off-site contribution
	within 100-400m	On-site	On site or off-site contribution	On site or off-site contribution
	within 400-800m	On-site	On-site	On-site or off-site contribution
No existing provision	within 100 m	On-site	Off-site provision	Off-site provision
	within 100-400m	On-site	On-site	On site or off-site provision
	within 400-800m	On-site	On-site	On-site

161. The financial contributions required in line with the Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD (2015) would pay for 'off-site' provision, directly funding new and enhanced play equipment close to the site as part of a strategic approach. For example, if this scheme fell short on provision for each age group, the contribution would go towards new or existing park spaces within the OKROA.
162. Using the GLA's latest Population Yield Calculator (v3.2) and assuming Inner London and a PTAL of 3/4, the scheme generates a total child yield of 75.7, which equates to a total play space requirement of 757sqm. In total 757.3sqm of play space is provided on site.
163. The play space areas for each age group is provided on the first floor podium and eighth floor terrace. The design would incorporate landscaped features amongst a variety of play equipment that would be suitable for both children and toddler play. This will also require the submission of detailed planting and screening, and a detailed drawing condition requiring designs of the landscape, including all play provision, will be secured by condition. The applicant has been advised that any design of playspace will need to include water and sand play as required by the draft OKRD AAP. In addition detailed design of the terrace parapets will be secured by condition to ensure the safety of those using the amenity terrace space.

Children's Play Space Calculations

Table: Proposed areas of dedicated external play

Location	Area of dedicated play space
First floor podium	757.3sqm

164. The following table summarises the policy requirements for children's play space, against that proposed.

Table showing proposed external play space in the development, and shortfall against policy requirements

Dedicated outdoor child play Space. This can be provided in either the communal or public open space but must be provided in addition to that space, rather than as a sub set of that space.	Required play space based on child yield.	Proposed play space	Shortfall

0-4 years	306.3sqm (306sqm required)	Play space proposed for all children located on the first floor podium and eighth floor terrace	0sqm
5-11 years	248sqm (248sqm required)		
12+ years	203sqm (203sqm required)		

Public Open Space

165. In addition to the adopted amenity space requirements set out above, emerging Policy AAP11 of the draft OKR AAP requires the provision of 5sqm of public open space per proposed home. The plan identifies that some sites are expected to provide public space as part of their redevelopment and others are not. In the later instance those site will be expected to make s106 contributions to off-site public space provision. This will be charged at £205 per square metre. As set out in the Section 106 and CIL SPD, £205 per sqm represents the average cost for improving open space in Southwark.
166. The subject site is identified within the OKR AAP as a site that is not required to provide public open space. Nevertheless it does provide 265 sqm of public space and in line with the aspirations of policy AAP 11 'Parks and Healthy Streets – The Greener Belt' of the OKR AAP, where the site does not provide 5sqm of public open space per dwelling in total, a financial contribution will also be secured through the S106.

Public Open Space Calculation

Table: Public open space proposed

Public Open Space (Public space at ground floor, excluding play space)	Draft OKR AAP (2017) requirement AAP 11: Parks, streets, open spaces –The Greener Belt. (page 73)	Proposed public open space	Off-site Payment
	Provide 5sqm of public open space per dwelling. If it is not feasible to deliver the open space on site, a financial contribution will be required. 850sqm required	265sqm	585sqm shortfall 585sqm x £205 = £119,925

167. As set out in the table above, a financial contribution of £119,925 would be required. The payment of the financial contribution, which would be secured through the Section 106 Legal Agreement. The money would go towards the maintenance and improvements of public parks and spaces within the Old Kent Road Opportunity Area.

Sunlight Amenity Analysis within the Proposed Development

168. BRE guidance for overshadowing to gardens and open spaces within a development recommends that at least 50% of any garden or amenity area should receive at least one hour of sunlight on 21 March. The playspace and communal amenity areas located on the first floor podium and 8th floor terrace provide the external amenity sources for residents within the scheme. Tests undertaken using the BRE guidance demonstrate that the first floor podium and 8th floor terrace, owing to their predominantly south facing locations adhere to the BRE recommendations for sunlight amenity within developments.

Conclusion on Outdoor Amenity Space, Play Space and Public Open Space

169. In conclusion, the private, communal and playspace proposals are of an exceptional quality with all provision provided on site. The locations of the amenity spaces are well thought out with south and southwest facing amenity spaces that enables the areas to maximise benefit from natural daylight and sunlight. The mix of private amenity options including balconies and winter gardens are well positioned and spacious for residents to enjoy. The children's playspace proposals are supported by officers and would provide a mix of imaginative and informal play options for children within the development. The landscape proposals for the external terrace areas are efficiently planned which is a positive aspect of the scheme. To ensure the spaces delivered are of the highest quality, detailed landscape design and children's playspace are secured by condition and attached to this decision notice.
170. In addition to the above some public open space is provided on the site as well as agreed financial contributions that would directly fund the maintenance of areas of open spaces and parks within the opportunity area as required by the draft AAP. Overall, the provision of private, communal and children's playspace amenity on site is a significantly positive aspect of the scheme.

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

171. Policy P56 (Protection of amenity) of the Southwark Plan states that developments should not be permitted when it causes an unacceptable loss of amenity to present or future occupiers or users. This includes privacy and outlook impacts, overlooking or sense of enclosure, loss of daylight and sunlight, and unacceptable noise from developments.

Impact of the Proposed Uses

172. The retention of the existing Jewson with an improved facility along with the introduction of residential uses to the upper floors is considered to provide activation of the site at ground floor level, and would enhance the vitality and vibrancy of Ilderton Road. The proposed uses comply with the intentions of this site within OKR16 of the OKR AAP. On this basis, it is considered that the proposed uses would not cause any harm to surrounding neighbour amenities, and accordingly are all found to be acceptable uses.

Daylight and Sunlight Impacts

173. 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

174. 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.
175. 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.”
176. 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.
177. The BRE guideline tests undertaken for this daylight assessment are the Vertical Sky Component (VSC) and No Skyline (NSL). The VSC test calculates the angle of vertical

sky at the centre of each window and plots the change between the existing and proposed situation. The target figure for VSC recommended by the BRE is 27%, which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE also advises that VSC can be reduced by about 20% of its original value before the loss is noticeable. In other words, if the resultant VSC with the new development in place is less than 27% and/or less than 0.8 times its former value, then the reduction in light to the window is likely to be noticeable.

178. The distribution of daylight within a room can be calculated by plotting the NSL. The NSL is a line which separates areas of the working plane that do and do not have a direct view of the sky. Daylight may be adversely affected if, after the development, the area of the working plane in a room which can receive direct skylight is reduced to less than 0.8 times its former value.

BRE Sunlight Tests

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

- receives less than 25% of annual probable sunlight hours, or less than 5% of annual probable sunlight hours between 21 September and 21 March and
- receives less than 0.8 times its former sunlight hours during either period and
- has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours.

Overshadowing

180. 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.'
181. The closest properties to the development consist of a mix of residential and commercial buildings. These properties are:
- 209-225 Ilderton Road,
 - 60a and 62 Hatcham Road/134-140 Ilderton Road
 - 179 Ilderton Road (Atar House)
 - 180 Ilderton Road
 - 227-255 Ilderton Road
 - Surrey Canal Site (London Borough of Lewisham)

Image: Plan demonstrating subject site (Pink), consented context (Blue), and built context (Grey)



Impacts

209-225 Ilderton Road

Image: Context of 209-225 Ilderton Road to subject site

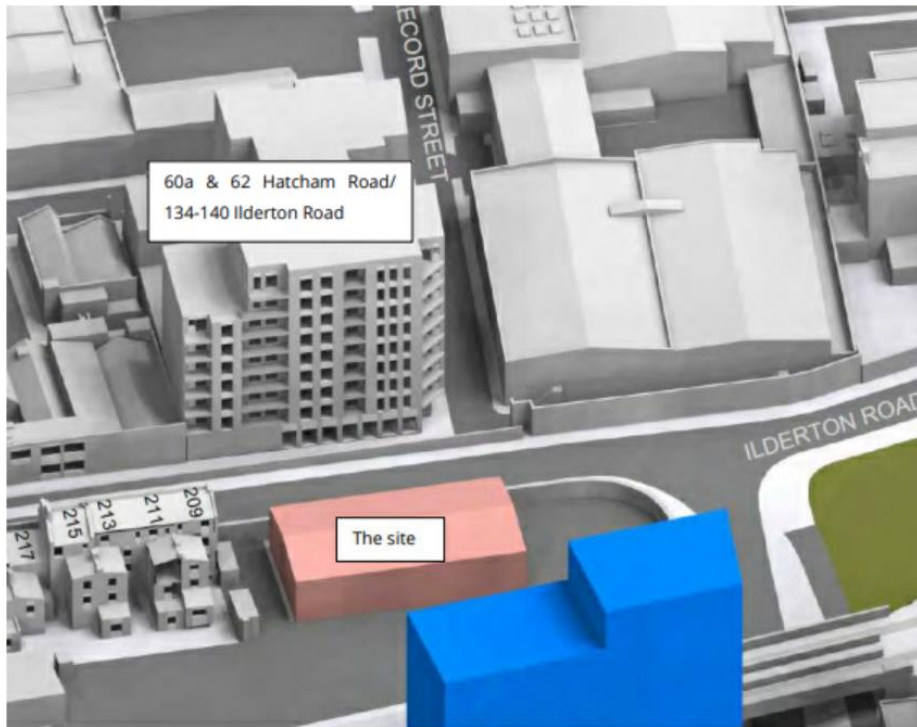


182. The existing VSC values are reflective of the above image, with unobstructed values in the region of circa 25%VSC-30%VSC. The self-constrained areas (i.e., adjacent the rear extensions) by contrast record circa 5%-15% VSC, reflective of their obstructed locations.

183. Post-development, 36 of the 45 windows analysed (i.e., 80%) would either retain in excess of the default BRE targets or experience no noticeable change from their baseline VSC figure. Of the 9 remaining windows, 7 are located at 209 Ilderton Road, the end terrace house with an unusually open outlook across the site adjacent discussed above. One is understood to serve a bathroom, and on this basis can be disregarded given its non-habitable room. The remaining 6 are all located in the rear section of the property, overlooking the site.
184. Post-development, the retained VSC values for these 6 windows would be comparable to the neighbouring houses in the terrace of similar design but which do not have the unusual open aspect across the site, but rather face their neighbouring rear extension. The change from this unusually high baseline would inevitably be noticeable; however, the retained values are considered acceptable. The remaining 2 windows not meeting the default BRE recommendations are located in the self-obstructed area to the rear of 213 Ilderton Road, where small absolute/ shift changes record as misleadingly high percentage differences. The two rooms served by these windows feature a second, unaffected window which means internal conditions are less affected and therefore the effects are considered acceptable.
185. Regarding NSL tests undertaken, the results showed a very similar pattern as the VSC results with 34 of the 36 habitable rooms analysed, equating to 94% of rooms, showing either none or unnoticeable changes post-development. The two habitable rooms recording potentially noticeable changes are both located in the side elevation at 209 Ilderton Road directly on the boundary with the site and are understood to be served by one window facing towards it. The change to bedroom R1/104 is circa 10% absolute NSL, translating to a percentage difference of 24.69%. This is slightly above the 20% at which the BRE considers changes may become noticeable. Given its use and retained value the effect is considered acceptable.
186. The remaining room is annotated R1/105 in the assessment drawings within the daylight/sunlight report. As demonstrated, this is a living area which we understand has been subdivided from the original larger room to provide a separate kitchen. This has had the effect of this room being served by a single window, which is located directly on the site boundary and overlooking the unusually low-rise massing presently occupying it, a situation in which the BRE predict a greater degree of change is inevitable.
187. The design in this area has been carefully considered, resulting in an immediate scale/outlook comparable to the neighbouring terraces which have the more usual side extension to side extension arrangement. The design also includes for an area of new planting between the terrace and the covered yard and a generally improved outlook when compared to the current one i.e., an attractive and robust brick building with the majority of activity contained within. On balance, it is therefore considered that the effect is acceptable.
188. Regarding sunlight impacts, Given the location of the proposed development to the north of the terrace, the analysis demonstrates no material change to existing APSH values.

60a and 62 Hatcham Road/134-140 Ilderton Road

Image: Context of 60a and 62 Hatcham Road /134-140 Ilderton Road to subject site



189. The potentially affected site adjacent to the subject site is currently in the final stages of completion. To assess the likely impact on other proposed new developments where detailed internal layout are available and window positions are finalised, the BRE Guidelines state that the Average Daylight Factor (ADF) test is most appropriate. ADF provides an absolute measure of daylight expressed as a ratio of daylight for the room in question as a proportion of the daylight outside at any moment in time. The ADF for a living room should be above 1.5% (i.e. the room should enjoy a minimum of 1.5% of the average external daylight at any moment in time), whilst that for a bedroom and kitchen should be in excess of 1% and 2% respectively.
190. The assessment detailed has shown that the most at risk properties to potential daylight loss are located on the lower floors levels of the residential accommodation facing the subject site, namely floors 1 and 2. The assessment demonstrates that the ADF values in the scenario for the four combined living/kitchen/dining (LKD) areas facing the site ranged from 0.2%ADF to 1.7%ADF, all below the default BRE/BS target. The four bedrooms are served by windows solely facing the site and their results ranged from 0.6%ADF to 1.3%ADF. As such, one habitable room (an unobstructed bedroom) met the default recommendation.
191. In the proposed condition, the four living areas would achieve comparable ADF values when compared to those consented, ranging from 0.81%ADF to 1.22%ADF. In particular, the consented value for the lowest LKD as shown above would significantly improve from 0.2%ADF to 0.81%ADF. This pattern continues for the rest of the elevation facing the site, with the retained proposed ADF values being comparable

with the consented in general and also significantly improving the lowest ones. Given the above assessment it is therefore considered that the proposed ADF values are acceptable.

192. Also undertaken for this daylight assessment on the potentially affected properties was the NSL methodology. The assessment demonstrated that of the 90 habitable rooms facing the site, 52 (i.e., 58%) would achieve the default BRE recommendations post development. When taking into account the context and design of the façade assessed, this is a high overall value. The remaining 38 rooms are comprised of 24 bedrooms (i.e. 63%) and 14 combined LKD rooms. The BRE guidance sets out that NSL to bedrooms is less important, given their mainly night-time use. Retained NSL values for the LKDs are due to their design, whereby they are served by a single window and over 5m in depth. Paragraph 2.2.10 of the BRE guidance states that *“if an existing building contains rooms lit from one side only and greater than 5m deep, then a greater movement of the no sky like (NSL) may be unavoidable.”* It is therefore considered that the retained NSL values are acceptable.
193. The potentially affected windows serving this property are orientated due east. Therefore any dwellings would not have any reasonable expectation of sunlight amenity aside from a certain point of the day, in this case the morning, and were not assessed, in line with the BRE guidance.

179 Ilderton Road (Atar House)

Image: Context of 179 Ilderton Road (Atar House) to subject site which is located to the south out of view



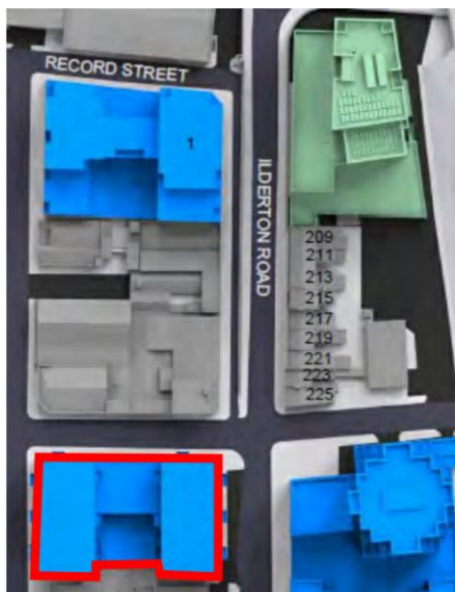
194. Atar House is located directly to the north of the site, across Pat Hickson Gardens. As seen in the image above, the elevation facing the site features recessed windows understood to serve living areas. These are obstructed both above and beside the window. In these types of situations, the BRE predict their default guidance may not be possible to achieve. Post-development of the subject site, 41 of the 47 windows analysed (i.e., 87%) would either retain in excess of the default BRE targets or

experience no noticeable change from their baseline VSC figure. The 6 remaining windows are all located in the recessed areas discussed above, where they record materially lower baseline VSC values as a result.

195. As predicted in the BRE guidance, small absolute/ shift changes of circa 2%VSC would be expressed as misleadingly high percentages of over 20%. Whilst these can signal noticeable differences when applied to higher VSC values, the actual change between the existing and proposed VSC values for these windows is sufficiently small to be considered a “no-worsening” of the baseline. Given the results for unobstructed areas directly adjacent, it can be concluded that if an alternative “without balconies” assessment was to be undertaken for these 6 windows, it would demonstrate that their recessed nature is the main contributor to the percentage changes recorded, particularly considering the distance between the flank elevation of this site and the subject site.
196. The NSL results take into account conditions within rooms served by more than a single window and these all showed either none or small, imperceptible changes post-development.
197. Regarding sunlight impacts, the two bedrooms, located in the self-obstructing recessed areas of the elevation mentioned above, would experience slightly greater than 20% change to their existing APSH, again this is because the existing values are very low due to their design. Small actual/ shift changes in APSH therefore result in misleadingly high percentage value changes. As set out in the BRE guidance, the overall annual loss of APSH for these two bedroom windows is no greater than 4% and therefore will not be adversely affected.

180 Ilderton Road

Image: Context of 180 Ilderton Road (outlined in red) to subject site (green)



198. Given the distance of the development from the subject site, the VSC façade renders confirmed retained VSC values on the extant consented potentially affected facades would range between 30%VSC- 35%VSC in unobstructed areas.
199. In terms of the sunlight test, the potentially affected facades at 180 Ilderton Road are orientated due north. Therefore any dwellings would not have any reasonable expectation of sunlight amenity and were not assessed, in line with the BRE guidance.

227-255 Ilderton Road

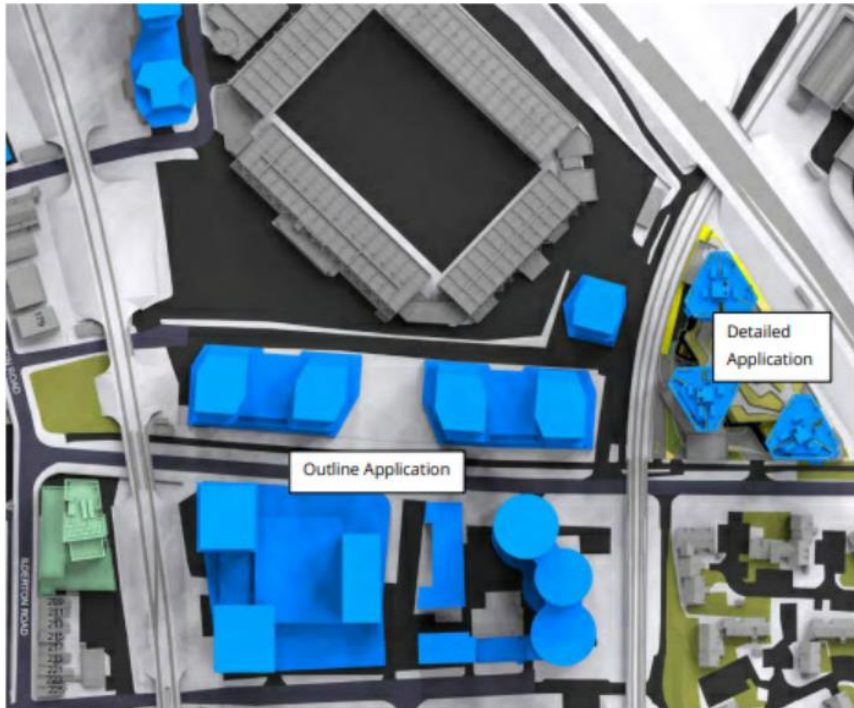
Image: Context of 227-255 Ilderton Road (outlined in blue) to subject site (green)



200. Much like with the findings from the assessment undertaken on the impacts at 180 Ilderton Road, the VSC façade renders confirmed retained VSC values on the extant consented potentially affected facades would range between 30%VSC- 40%VSC.
201. In assessing any sunlight impacts, the potentially affected facades of the consented 227-255 Ilderton Road scheme are orientated due north. Any dwellings located here would not have any reasonable expectation of sunlight amenity and therefore were not assessed.

Surrey Canal Site (London borough of Lewisham)

Image: Context of Surrey Canal Site (blue) to subject site (green)



202. It is acknowledged that the closest part of the Surrey Canal redevelopment is in outline, and would be located to the rear of the subject site. Notwithstanding this, VSC tests were undertaken. The VSC façade renders confirmed retained VSC values on the extant consented potentially affected facades would range between 25%VSC-40%VSC. As such, the proposed development would not prevent adequately lit dwellings to be designed here.
203. Regarding sunlight impacts, the potentially affected facades are orientated west, therefore subject to the same considerations set out above, i.e. that any dwellings placed here are likely to be considered insufficiently sunlit given the lack of a more southerly orientation. Notwithstanding this, APSH façade renders confirmed retained APSH values would range between 20%APSH- 40%VSC. Therefore, the proposed development would not prevent adequately sunlit dwellings to be designed.

Overlooking of Neighbouring Properties

204. 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.
205. The subject site sits on a corner plot at the junction of Surrey Canal Road and Ilderton Road. Therefore the most at risk property for potential overlooking impacts is the adjacent development at 60 and 62A Hatcham Road/134-140 Ilderton Road. This site sits across the highway from the subject site. The existing distance between the front elevation of 60 and 62A Hatcham Road/134-140 Ilderton Road is circa 20 metres. Given that the proposed development would be setback slightly from the current

building line of Jewson, the distance will exceed the minimum separation distance of 12 metres as set out in Southwark's SPD.

TRANSPORT CONSIDERATIONS

206. Policy P50 'Highways impacts' of the Southwark Plan 2022 seeks to ensure that developments minimise the demand for private car journeys. In addition, the policy requires developments to demonstrate that the road network has sufficient capacity to support any increase in the number of the journeys by the users of the development, taking into account the cumulative impact of adjoining or nearby development. As this is a Southwark council application and therefore any requirements will be contained in the unilateral undertaking.
207. 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.
208. 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.
209. The Mayors Transport Strategy (MTS) Mayors Transport Strategy (MTS) includes three strategic challenges that are of significant importance to assessing this application.
- Good Growth
 - New homes and jobs
 - A good public transport experience
210. 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.
211. Officers have reviewed this application and identified the following areas for detailed comments:
- Access and Road Safety – The safe movement of all modes entering and exiting the public highway
 - Trip Generation –The existing and proposed trips related to the site
 - Servicing and Delivery – How the development will manage the vehicular trips required
 - Car Parking - How the development will manage the vehicular trips required
 - Public Transport – Current access and future potential
 - Active Transport – Walking and cycling and behaviour change

Existing Site Layout

212. The site is located along the eastern side of Ilderton Road. The site is bound by Surrey Canal Road to the north, Ilderton Road to the West and Rollins Street to the South and the Railway line to the East. At present the site includes a builders' merchants with vehicular access from Rollins Street. Surrey Canal Road provides access into the London Borough of Lewisham and accommodates a Cycle path to the northern side of the road. Rollins Street is a 300m long cul-de-sac, which provides a pedestrian/cycle access only from its terminus to the residential area to the east. Due to the proximity of Millwall Stadium on match days there are a lot of extra vehicle movements in the area. The rear of the site is bounded by the railway line.

Proposed Site Layout

213. The proposed future site layout will increase footway widths improving the pedestrian movement along Ilderton Road. The proposed access arrangements and loading bay will be detailed up as part of the S278 agreement. The Council programme for the CPZ includes this area and subject to consultation will be implemented within the next two years. The Council is introducing improved cycle routes from Rotherhithe to Peckham, this proposal does not impede on that project. The traffic management related to the site separates residential movement and industrial vehicle movement. Residential vehicular movement will be restricted to the entrance at Surrey Canal Road with commercial vehicular access focused from Rollins Street. A Condition requirement for the detailed design of the landscaping and public realm will ensure secure by design and road safety is fully considered.
214. The proposal included tracking of the yard access and residential access ensure sufficient swept paths for a variety of vehicle sizes. All works within the extent of the S278 for Southwark will be done in accordance with Southwark Street Design Manual SSDM and TfL's Healthy Streets design guidance. A condition requirement for the detailed design of the landscaping and public realm will ensure secure by design and road safety is fully considered.

Trip Generation

215. The proposed scheme will generate largely sustainable methods of trips, and the TA estimates servicing demand for the 22 motorised vehicular trips per day.

Servicing and Delivery

216. Delivery and servicing for the residential element of the scheme will be located in a servicing area located off of Surrey Canal Road. It has been agreed with Southwark Transport and Highways officers that access to this servicing area is to be explicitly signed as "left-in left-out" only, covered by a Traffic Regulation Order, and funded by the applicant. This is considered to be an appropriate mitigating factor to relieve potential traffic issues on Surrey Canal Road in line with comments made by Lewisham Borough on this arrangement.

217. As part of the proposals the completed site will be supported by a concierge / management team and it is proposed that this Concierge along with the Travel Plan Co-Ordinator will act as the co-ordinator of this Delivery Service Management Plan (DSMP). As part of their duties the Concierge will manage and control the flow of delivery and servicing vehicles to the dwellings which will be managed through the use of a booking system for all residents.
218. The booking system shall be limited to allow for only one delivery to occur within an allotted 10 minute time slot. This would limit and manage the use of the loading bay where possible. It will also be the duty of the Concierge to include within the booking system the times of regular delivery and servicing arrivals, such as postal and refuse vehicles. The Concierge will store handheld sized non-food goods for residents in the event they are not at home when a delivery is made with larger goods returned to the depot. Deliveries by supermarkets will not be accepted by Concierge.
219. In order to ensure that on-street servicing and deliveries do not negatively impact on the highway network, the Council is recommending that applicants in the Old Kent Road Opportunity Area enter into Delivery Service Plan Bonds against their baseline figures for all daily servicing and delivery trips. These bonds would be calculated at £100 per residential unit and £100 per 500 sqm of non-residential floor space. In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, this is not intended as a financial penalty, but as a means of mitigating any harmful impacts from the proposed development and ensuring a better quality of life for current and future residents. As such, it is considered to meet the CIL Regulation 122 test, in that it would be:
- (i) necessary to make the development acceptable in planning terms;
 - (ii) directly related to the development; and
 - (iii) fairly and reasonably related in scale and kind to the development
220. The proposal is for the concierge / management of the new development to monitor the daily vehicular activity of the site for both commercial and residential accommodation, quarterly for a period of 2 years from 75% occupancy. If the site meets or betters its own baseline target the bond will be returned within 6 months of the end of the monitoring period. If the site fails to meet its own baseline the bonded sum will be made available for the council to utilise for sustainable transport projects in the ward of the development. It is also noted that the commercial deliveries to the development will follow the existing arrangements currently in place for Jewson.
221. All uses in the development will be subject to a condition on the marketing and promotional material related to the work to ensure this is explicit in how the development has been designed to discourage private cars and encourage sustainable living, working and visiting. In addition, a final DSMP is secured by condition and attached to this decision notice.

Car Parking

222. The residential element of the development will be car free, excluding the provision for three blue badge spaces with electric charging points. The strategy for disabled parking provision has been based on pre-application consultation with Southwark officers and is designed to accommodate predicted need and be flexible given the

quantum of development within the area and the wish to avoid the over provision of on street disabled parking spaces which have or will be provided by adjacent developments.

223. The commercial aspect of the development will retain 8 existing car parking spaces. Given the nature of the business which sells wholesale building materials, a level of car parking is required to enable customers to transport their purchases from the site. To adhere to the principles of sustainable methods of transport, Electric Vehicle Charging Points are to be conditioned to be installed in the commercial car parking area to encourage customers in their use of transportation. There will be a S106 obligation that prevents residents and office users of the proposed development from obtaining resident parking permits.

Public Transport

224. The site is served directly by local bus route P12, and is within 600m of the junction with Old Kent Road where more bus services are located. Tracking drawings demonstrate that the upgraded Ilderton Road/Surrey Canal Road junction can accommodate double decker buses should TfL propose double decker bus routes past the site in the future. The nearest rail station to the site is South Bermondsey Station which is located circa 415m north of the site, or a 7 minute walk. As a borough Southwark agrees with TfL that bus services will need to be increased in the area ahead of the BLE to accommodate the demand generated by additional homes and jobs generally in the Old Kent Road area. The requirement for TfL to provide evidence to prove both previous contributions has been spent appropriately and the evidence for the further draw is the fairest way this could be managed. The proposal is that there is a maximum cap for TfL to call on which is £2,700 per unit.

Active Transport

Walking and public realm

225. The TA does include an Active Travel Survey. The development is located nearby to Bramcote Park, Bridgehouse Meadows in the London Borough of Lewisham, and adjacent to Pat Hickson Gardens and further across Southwark. The application has increased the footway width of Ilderton Road this will be delivered through the S278 agreement.

Cycling

226. The site is located close to Quietway 1 which links Greenwich with the West End. In addition, there are a number of cycle routes within close proximity to the site. These routes provide useful connections to key public transport interchanges, such as South Bermondsey, Elephant and Castle and London Bridge. Cycle parking will be provided in line with the London Plan 2021 standards. The proposals will provide 322 secure and covered cycle parking spaces for residents, which will be provided as a mix of Sheffield stands and stacked stands. 6 short-stay cycle spaces are also proposed and will be located at the entrance from Surrey Canal Road. The commercial element proposes 8 long-stay spaces and 4 short-stay spaces. The long-stay cycle parking will

be located within a shelter in the external yard, with short-stay spaces in the public realm in front of the residential blocks on Surrey Canal Road, close to the workspace entrance. A condition is attached to this decision required detailed design of the cycling parking provision. The S106 Agreement will include a contribution towards the delivery of a new Cycle Hire Docking station of £50 per residential unit.

Construction

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

Conclusion on Transport

228. 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

229. The site is within the 'Bermondsey Lake' Archaeological Priority Zone (APZ), which is designed to protect the palaeological environment and prehistoric archaeology recovered from the shoreline and relict fills of the large Late Glacial Bermondsey Lake and the associated riverine geology and topology. The site is also close to the 'Old Kent Road' APZ, which has the potential to contain features associated with the former route of 'Watling Street', the major Roman road between London and Canterbury. When the New Southwark Plan is adopted, the site will lie within the newly extended 'North Southwark and Roman Roads' Tier 1 Archaeological Priority Area (APA).
230. 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.
231. A Desk-Based Assessment by BWB consulting has been submitted as part of this application. Southwark's Archaeologist has reviewed the DBA and raises no objection to the development given that the DBA adequately summarises the archaeological potential of the site. Southwark's Archaeologist recommends conditions requiring an archaeological evaluation, subsequent mitigation works and foundation design should be applied to the decision notice. In addition, any site investigation should be monitored by suitably qualified archaeologists. Much of the archaeological interest of

this site comes from geoarchaeological deposits whose presence can be identified through monitoring of such works.

AVIATION

232. The National Air Traffic Safeguarding Office (NATS) were consulted on the development, but at the time of writing, have not responded to the consultation request.

TV AND RADIO SIGNALS

233. Arqiva own and operate the UK Terrestrial Television Broadcast network and supply the Freeview platform. They also own and operate 90% of the UK Radio Broadcast network, through which they broadcast the full range of BBC and commercial radio stations. In addition, many sites that they own or manage are shared by other operators, such as BT, the Mobile Network Operators, Airwave (Emergency Services Networks), roadside services and Central and Local Government departments and agencies.
234. Arqiva did not respond to a consultation letter regarding the development sent on 14/09/2021. It is therefore considered that Arqiva do not have an objection to the proposed development.

ENVIRONMENTAL CONSIDERATIONS

Refuse and Waste

235. A Waste Management Strategy has been submitted with the application which outlines the waste proposals over all phases of the development. The waste generation metrics used in this Strategy are based on Southwark's Waste management guidance notes for residential developments.
236. Each block will have a separate refuse store that is located on the lower ground floor. The quantity of bins has been calculated following Southwark's waste management policy with each residential core having level access from the lifts to the refuse stores at this level. Bin stores will be monitored over the course of the week by on-site building management and will be rotated should bins at the front of the store become full. Bulky refuse storage has also been included adjacent to the bin stores.
237. Due to the level changes on the site between the lower ground floor and Ilderton Road, a management strategy will be in place for on-site staff to move the refuse bins to the kerb side on collection day via a platform lift with a travel height of 800mm. Refuse will be collected from Ilderton Road as refuse vehicles already stop on this section of road for collections from the neighbouring terraces.

238. Southwark Waste Management Officers and Highways Officers have raised concerns over the presentation of bins on the public highway. In acknowledging these concerns, it must be stated only the residential refuse will be collected from the street, and will be a once-a-week operation. The commercial waste will be collected from the external yard of Jewson. Taking into consideration the constraints of the site, it would not be possible to create a loading bay within the development itself for refuse vehicles. Additionally, the residential waste collection is unable to be collected from the external yard as Jewson requires their operations to be separate for liability purposes.
239. Furthermore, as the redevelopment of the site includes the widening of the footway along Ilderton Road, this will enable the bins to be accommodated at the back of the footway. As part of the management strategy, the concierge will ensure that the bins are ready for collection in advance of the refuse vehicle arriving. This will include moving the bins from the bin store and then placing them at the back of the widened footway. These will then be returned to the refuse store as soon as the collection is completed. The current footway width will therefore be maintained at all times.

Wind and Microclimate

240. The report demonstrates that the meteorological data for the subject site shows prevailing winds from the southwest quadrant throughout the year with the secondary winds being predominantly from the direction of northeast that are more prevalent in the spring months. The baseline scenario, contained within the report as Configuration 1, assesses the wind condition of the existing site. The results indicate that there are no instances of strong winds that would amount to any safety concerns for pedestrians.
241. Configuration 2 within the report focuses on a pre-mitigated scenario which demonstrates that there would be unsuitable wind conditions both at ground and upper-level areas of the proposed development which includes thoroughfares, amenity spaces, balconies, and entrances. Furthermore, there would be strong winds with a potential for safety concerns at a thoroughfare in the northwest corner of the building, the three amenity spaces on the 8th floor terrace, and balconies between the 4th and 7th floors, and 12 to 21 floor levels on the southwest corner, and balconies between the levels 12 and 23 at the northwest corner. The findings demonstrate that these locations would require mitigation measures to ensure a safe wind environment for pedestrian, cyclists and residential occupiers.
242. Taking into consideration the potential harm above, mitigation measures in the form of landscaping measures including shrubs/hedging or dense planting to a height of 1.5m to be located at the south of seating areas within the development. Additional mitigation measures include 50% porous balustrade 1.1m in height to balconies potentially affected, and a full height 50% porous screen between the column and façade at the northwest corner, at the undercut of the building. With the proposed landscaping scheme and wind mitigation measures in place (Configuration 4), all locations within and around the proposed development would have suitable wind conditions for the intended use. There would also be no instances of strong winds with potential for safety concerns.

Fire strategy

243. 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.
244. A Fire Statement Form and Fire Safety Strategy by Jensen Hughes has been submitted with this application. The strategy demonstrate how the development would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. The provision of a suitably-sized evacuation lift in the residential core is also proposed in line with Policy D5 of the London Plan. The measures contained within the statements are secured by condition within the decision notice. GLA Officers and London Fire Brigade Officers have reviewed the submitted Fire Statement and Strategy, and raise no objection to the information within the document.

Flood Risk and Water Resources

245. 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.
246. The Environment Agency (EA) has reviewed the submitted information in relation to flood risk and has no objection to the proposed development.
247. The site is currently wholly developed comprising two existing Jewson buildings and an external service yard. The development proposals will aim to reduce the peak runoff rates from the site to as close to the greenfield runoff rates as is feasible. The Council's Flood Risk Team has reviewed the revised Sustainable Drainage Statement and 24.0l/s is acceptable, based on the runoff being reduced to 1.5l/s and the remaining site area (0.102ha) being discharged at 22.5l/s. This results in an improvement on the existing runoff rates currently on site. A pre-commencement condition has been attached to the decision notice seeking full details of the proposed surface water drainage system incorporating Sustainable Drainage Systems (SuDS). A pre-occupation condition seeking a Drainage Verification Report is also attached to the decision notice.

Ground Conditions and Contamination

248. A Phase 1 Environmental Study has been undertaken by BWB Consulting. The study has found that the site has been utilised as a wharf, timber yard and a builder's yard in the north and central area and for residential housing for a small period of time in the south. Above ground storage tanks have also been present in the north east and a sunken petrol tank in the centre of the site. The surrounding land has undergone extensive development of both industrial and residential purposes including various works, railways, factories and depots.

249. The ground conditions at the site are anticipated to comprise varying thicknesses of hardstanding over superficial deposits of Alluvium and the Kempton Park Gravel Member, overlying a small strip of Thanet Formation bedrock in the south beneath which is the Lewes Nodular Chalk Formation. Made Ground is anticipated to be present on site due to historical developments in the south and an infilled canal along the northern boundary. Additionally, significant potential pollutant linkages have been identified, such as the infilled canal, unspecified tanks, underground fuel storage tanks, and timber yard on site which have the potential to have an impact on site.
250. Southwark's Environmental Protection Team (EPT) has reviewed the Phase 1 assessment and following review recommends that a Phase 2 site intrusive investigation is undertaken before any works commence on site. The recommended condition is attached to the decision notice.
251. The Environment Agency have reviewed the proposals in relation to contaminated land and made the following recommendation.
252. "The 'Phase 1 Geo-environmental Assessment and Geotechnical Risk Register' by BWB (dated December 2021, ref.JIR-BWB-ZZ-XX-RP-YE-0001_PH1_P2 rev.P03) in support of this planning application, provides us with confidence that it will be possible to suitably manage the risk posed to controlled waters by this development. Further detailed information will however be required before built development is undertaken."

Air Quality

253. The subject site is located in the Southwark Air Quality Management Area which is designated for the potential exceedance of the annual mean nitrogen dioxide (NO₂) and daily mean PM₁₀ air quality objectives. Southwark Plan Policy P65 'Improving air quality', states that development should address the impacts of poor air quality on building occupiers and public realm users by reducing exposure to and mitigating the effects of poor air quality.

An Air Quality Assessment compiled by BWB Consulting has been submitted with this application. The assessment concludes that pollutant concentrations are predicted to be below the relevant air quality objectives and the proposed development, once operational, will be better than air quality neutral. Mitigation measures are recommended to reduce the potential for temporary dust impacts during construction. Southwark's EPT Officer has reviewed the AQA and raises no objection to the information contained within the assessment.

Noise and Vibration

254. A noise and vibration assessment (and a subsequent addendum) have been submitted in support of this application, prepared by BWB Consulting. The report demonstrates a robust glazing specification would provide internal noise levels for all residential environments which would comply with the British Standard for residential accommodation. EPT Officers agree with the findings of the report and recommend conditions be attached to safeguard the amenity of occupiers within the development

and nearby residents and businesses. The conditions recommended are attached to this decision notice.

Agent of change

255. 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.
256. To the northwest of the subject site is an existing scaffolding yard and waste operation adjacent past the railway line. The impact of these sources has not been assessed in accordance with BS4142. The monitoring conducted was automated and hence it is not clear what impact these commercial/industrial sources may have.
257. EPT Officers have reviewed the information, and in respect of Agent of Change principles, have recommended that an acoustic survey will need to be undertaken for existing noise in industrial areas. This is to be secured by condition before acoustic details are agreed, and the condition is attached to this decision notice. In attaching this condition to the decision notice, the development will not prejudice the potential future redevelopment of the adjoining site and thereby complies with London Plan Policy D13.

SUSTAINABLE DEVELOPMENT IMPLICATIONS

Energy

258. 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.
259. Policy P70 of the Southwark Plan sets out the borough approach to ensuring that new developments tackle climate change. The approach is generally consistent with London Plan Policies but also requires new commercial developments to meet BREEAM 'Excellent'. The policy also states that residential developments must reduce carbon emissions on site (100% on 2013 Building Regulations). Southwark Council's carbon offset cost is £95 for every tonne of carbon dioxide emitted per year over a period of 30 years. This is the equivalent of £2,850 per tonne of annual residual carbon dioxide emissions.
260. An Energy Assessment and Sustainability Strategy based on the GLA energy hierarchy has been submitted by the applicant. This details how the targets for carbon dioxide emissions reduction are to be met. A combination of 'Be Lean' 'Be Clean' and

'Be Green' measures have been employed in an attempt to achieve the reduction in line with the GLA guidance on preparing energy statements, Southwark Plan Policy P70, and the Southwark Sustainable Design and Construction SPD.

Be Lean (use less energy)

261. For this stage the proposed development achieves a 28% reduction below the baseline site-wide. This represents a 25% reduction for domestic areas and a 38% reduction for the non-domestic areas using SAP10. The London Plan target for a 10% reduction from Be Lean measures has therefore been achieved for the domestic areas.
262. The Non-domestic areas exceed the London Plan Be Lean target of 15%. This is due to the large thermal envelope and the impact of energy efficient lighting, which represents a large proportion of the energy demand for these areas.

Be Clean (supply energy efficiently)

263. Having minimised the demand for energy, the energy systems have been selected in accordance with the hierarchy for selection:
- I. Connect to an existing decentralised energy network; then
 - II. Be future-proofed to connect to a planned decentralised energy network; or
 - III. Implement a site-wide low carbon communal heating system; and
 - IV. Explore and evaluate the potential to oversize the communal heating system for connection and supply to adjacent sites and, where feasible be implemented.
264. The SELCHP DHN is operated by Veolia, and preliminary discussions have taken place with the applicant, and are ongoing with the operators about the potential to connect to this network, with Veolia confirming that Ilderton Road is an area where a plan to install a DHN in the coming years. The strategy for the development is therefore to connect to this DHN.
265. In the interim, a strategy has been proposed that incorporates a communal Air Source Heat Pump (ASHP) system into the development. The heat load profile of the residential units is favourable, and in the short term this site-wide low carbon communal heating system will provide the best carbon savings over a purely gas boiler system. Furthermore, the communal ASHP system will be future proofed in order to connect to the SELCHP network when it is available.
266. The proposed communal ASHP heating system, supplying both space heating and domestic hot water supply to all units, produces a 42% carbon reduction for the Domestic assessment and a 0% reduction for the Non-domestic areas, resulting in an overall site-wide carbon reduction of 34% at the Be Clean stage. It is noted that once connect to the SELCHP DHN is enabled, the carbon reduction savings will substantially increase.

Be Green (Low or Carbon Zero Energy)

267. The current proposal for the development is to maximise available roof space for the provision of solar Photovoltaics (PV). There is limited roof space due to the massing of the building, with a small footprint relative to the building height, however, space has been identified for solar PV provision. It is expected that a c. 16.3 kWp array could be mounted when considering shading and access between panels. The specified solar PV panels would be highly efficient market leading solar panels.
268. It is proposed that a VRF/ASHP system will function as the primary means of providing heat energy for space heating plus cooling energy for summertime comfort cooling needs for the commercial spaces. In addition to the carbon savings delivered by such a system, this proposal also has the advantage of a single system providing both heating & cooling, with benefits in terms of cost and space. The VRF/ASHP type system proposed also produces no at-source emissions, which benefits air quality in the local environment.
269. The proposed implementation of low and zero carbon technologies, a combination of solar PV serving the units, and a VRF/ASHP system for the commercial spaces, provides an overall site-wide carbon reduction of 5% - comprised of a 2% carbon reduction for the Domestic areas, and a 20% carbon reduction for the Non-domestic areas.

Energy conclusion

270. The development adheres to the energy hierarchy, heating hierarchy and cooling hierarchy. The systems specified represent the best available for the development to save carbon while future proofing to allow connection to the proposed SELCHP DHN, should this become possible in the future. The PV system is the largest that the roof can accommodate. The development will further achieve 'zero carbon' through an offset payment in line with the London Plan and Southwark guidance. Overall carbon savings over the notional Part L baseline represents a 67% carbon reduction, well in exceedance of the 35% and 40% minimum reduction mandated by the GLA and Southwark, respectively.
271. As the development is unable to achieve the full 'Zero Carbon' target on site a contribution to the Borough's carbon offset fund will be required. The domestic elements carbon shortfall per annum amounts to £153,381, with the non-domestic element of the scheme resulting in a shortfall contribution of £55,063. The overall contribution to be secured in the S106 Agreement is £208,444. The S106 Agreement will also include the obligation of requiring the development to be constructed in accordance with the Energy and Sustainability Statement submitted with this application.

Overheating

272. London Plan Policy SI4 and Policy P68 of the NSP set out the cooling hierarchy that should be followed when developing a cooling strategy for new buildings. The six-step hierarchy is as follows:
- Minimise internal heat generation through energy efficient design; then

- Reduce the amount of heat entering the building through the orientation, shading, albedo, fenestration, insulation and green roofs and walls; then
 - Manage the heat within the building through exposed internal thermal mass and high ceilings; then
 - Use passive ventilation; then
 - Use mechanical ventilation; then
 - Use active cooling systems (ensuring they are the lowest carbon options).
273. A revised Dynamic Overheating Assessment has been submitted along with this application which details the methodology and findings units and commercial areas within the proposed development undertaken in line with the current London Plan (2021) Policy SI4 Managing Heat Risk. Units have been selected for the overheating assessment based on design characteristics that establish them as representative of the overall proposed scheme. This selection of units includes consideration of varying floors and of different orientations.
274. All units within the development will utilise openable windows as the primary means of ventilation, with a background mechanical ventilation system. Passive measures such as; high energy efficiency, solar controls glazing, and external shading in form of balconies have been explored and adopted as far as practicable to avoid the need for comfort cooling. The performance of the units has been assessed against CIBSE TM59: Design Methodology for the Assessment of Overheating Risk in Homes, and CIBSE TM52 the limits of thermal comfort: avoiding overheating in European buildings.
275. This assessment of units and commercial areas demonstrates that an acceptable overheating risk is achieved. All units tested, demonstrate an acceptable risk of overheating. The results are based on some key design features that follow the London Plan cooling hierarchy. Additionally, representative communal corridors (with and without external openings) have been modelled and demonstrated to pass with mechanical extract.
276. Commercial areas have been shown to fail the CIBSE TM52 criteria following passive design measures, including improved solar control glazing. This is due in part to the necessarily large display windows and opening profiles which are integral to customer access, thus reducing the capacity for natural ventilation and night time purging. As a result, the assessment recommends that active cooling be specified for these areas in order to mitigate overheating. The results confirm that active cooling complies with the CIBSE TM52 criteria. For the residential element, the council's EPT officer has recommended a condition is attached to the decision notice to ensure integral blinds are provided as part of the base construction.

Whole life cycle and carbon capture

277. London Plan Policy SI2 requires a calculation of whole life cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment (WLCA). This captures a development's unregulated emissions, its embodied emissions and the carbon impact of mid-life maintenance and end- of-life dismantling.

278. The submitted WCLA follows the guidance outlined in EN 1578:2011. Calculations have been provided via One Click LCA's 'LCA for BREEAM UK' Tool. The purpose of the BREEAM tool is to evaluate the whole life cycle carbon emissions of the development and make design decisions based on carbon data in order to reduce the life cycle carbon emissions of the building.
279. The results show that Structure, including such materials as concrete and reinforcement) are the biggest contributors to the building whole life global warming score, cumulatively contributing to 62.7% of the total buildings carbon emissions. Actions that have been identified within the WCLA to help reduce the impact of the development in each of the life cycle stages are encouraging.
280. A condition is attached to the decision notice regarding an updated Whole Life-Cycle (WLC) Carbon Assessment demonstrating compliance with Part F of Policy SI 2 - Minimising greenhouse gas emissions of the London Plan 2021. The final wording of the condition will be agreed with the GLA during the Stage 2 process post committee.

Table: WLCA Emission Results compared to GLA benchmarks

	Original Global warming/GIA (kg CO2e)	Proposed Global warming/GIA (kg CO2e)	WLC Benchmark	Aspirational benchmark
A	855	532	750 – 850	450 – 500
B & C (excluding B6 & B7)	394	231	300 – 400	180 – 240

Circular economy statement

281. Policy GG5 of the London Plan 2021 promotes the benefits of transitioning to a circular economy as part of the aim for London to be a zero-carbon city by 2050. Policy D3 requires the principles of the circular economy to be taken into account in the design of development proposals in line with the circular economy hierarchy. Policy SI7 requires referable applications to develop circular economy statements.
282. The submitted Circular Economy Statement demonstrates the sustainability measures incorporated into the design of the development, and outlines the adoption of circular economy principles throughout the design, construction and operation of the proposed development. Through the incorporation of fundamental sustainability principles, the proposed development will:
- Minimise the quantities of materials used;
 - Minimise the quantities of other resources used;
 - Specify and source materials and other resources responsibly and sustainably;
 - Minimise the quantities of materials used;
 - Minimise the quantities of other resources used;
 - Specify and source materials and other resources responsibly and sustainably;
 - Manage demolition waste
 - Manage excavation waste
 - Manage construction waste
 - Manage municipal waste

283. A planning condition requiring a Circular Economy Statement to be agreed in writing by the Council prior to commencement of any works on site. Additionally, a special condition is to be imposed on the decision notice that requires a post completion circular economy report no later than three months following substantial completion of the final residential unit. This report will set out the predicted and actual performance against all numerical targets in the relevant Planning Stage Circular Economy Statement shall be submitted to and approved in writing by the Local Planning Authority.
284. A post construction monitoring report is also secured by condition and this is included on the draft decision notice.

BREEAM

285. Southwark Plan Policy P69 requires developments to achieve a BREEAM rating of 'Excellent' for non-residential development and non-self-contained residential development over 500sqm. A Pre-Assessment BREEAM has been undertaken to establish a shell and core fit out to the commercial areas only, located on the Lower Ground level and Mezzanine level occupying 987.3sqm (GIA) / 1074sqm (GEA). The pre-assessment has considered the existing nature of the development site, along with the current development proposals and proposed building layout and demonstrated that the development being able to potentially achieve the minimum standards of the targeted 'Excellent' rating of 70.94%.
286. A planning condition is recommended to secure an independently verified BREEAM report demonstrating that these target ratings would be achieved through the detailed and technical design stages.

Water efficiency

287. For the residential aspect of the development, the applicant's Energy Assessment and Sustainability Strategy confirms that the dwellings would have a maximum indoor water consumption of 105 litres per person per day, in line with the optional standard in Part G of the Building Regulations. This will be achieved through the incorporation of low flow fixtures and fitting within the commercial and residential parts of the development to ensure water usage is minimised as possible. Therefore the development complies with Policy SI5 of the London Plan 2021.

Digital connectivity infrastructure

288. 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.
289. A condition is attached to the decision notice that requires detailed plans to be submitted to and approved in writing by the Local Planning Authority demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development. This is in line with the requirements of Policy SI6 of the London Plan 2021.

Health Impact Assessment

290. The London Plan Policy GG3 details the matters which must be considered for planning and developments to improve Londoners' health and reduce health inequalities. Additional policies which consider the health and wellbeing of Londoners include policy's GG1, D5, S1 and S2.
291. Policy P45 'Healthy developments' of the Southwark Plan states that development must:
1. Be easily accessible from the walking and cycling network; and
 2. Provide, or support opportunities for healthy activities; and
 3. Retain or re-provide existing health, community, sport and leisure facilities.
292. A Health Impact Assessment (HIA) has been submitted by HGH Consulting with the application. The HIA demonstrates that, of the 51 criteria considered by the London Healthy Urban Development Unit, the proposed development will have a positive impact on 36 and a neutral impact on 15. No negative impacts have been identified within the submitted report. It is therefore considered that the proposed development will have an overall positive impact on human health.

PLANNING OBLIGATIONS (Section 106 Undertaking or Agreement)

293. 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
294. Following the adoption of Southwark's Community Infrastructure Levy (SCIL) on 1 April 2015, much of the historical toolkit obligations such as Education and Strategic Transport have been replaced by SCIL. Only defined site specific mitigation that meets the tests in Regulation 122 can be given weight.

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

Table: Section 106 Financial Obligations

Planning obligation	Mitigation	Applicant's position
Local Economy and Workspace		
Employment and Enterprise	This development would be expected to deliver 38 sustained jobs to unemployed Southwark residents, 38 short courses, and take on 9 construction industry apprentices during the construction phase, or meet the Employment and Training Contribution. The maximum Employment and Training Contribution is £182,600 (£163,400 against sustained jobs, £5,700 against short courses, and £13,500 against construction industry apprenticeships).	Agreed
Employment skills and business	An employment, skills and business support plan is to be provided for this development.	Agreed
Affordable workspace	10% affordable workspace (applicable to the commercial unit fronting Iderton Road only) to be secured in the event Jewson leave the property	Agreed
Living wage	London living wage – best endeavours	Agreed
Housing and Viability		
Affordable housing monitoring	<ul style="list-style-type: none"> Financial contribution towards affordable housing monitoring of £8,073.35 (£135.35 per unit) 	
Affordable housing	<ul style="list-style-type: none"> 40.3% by habitable room (25.3% social rent; 15% intermediate) 	Agreed
Wheelchair Units	Secure 10.5% wheelchair housing by habitable room	Agreed
Management Plan	Management, operation and promotion strategy to be submitted and agreed prior to occupation.	Agreed
Transport and Highways		

Construction Management	<ul style="list-style-type: none"> • A detailed Construction Management Plan (CMP) and a £40 per unit (£6,800) contribution for Construction Management within the OKR AAP area. This is for the council to manage cumulative impacts on the highways and environment. 	Agreed
Southwark Highways s.278	<ul style="list-style-type: none"> • Repave the footways including new kerbing fronting the development on Ilderton Road, Surrey Canal Road and Rollins Street using materials in accordance with Southwark's Streetscape Design Manual (SSDM). • Construct the new vehicular entrance on Surrey Canal Road in accordance with SSDM standards. Similarly upgrade the existing vehicular entrance on Rollins Street to SSDM standards. • Detailed designs and method statements (AIP) for foundations and basement structures retaining the highway (temporary and permanent) should be submitted and approved by the Highway Authority. Please contact Anthony Davis (Anthony.Davis@southwark.gov.uk). • Provide access arrangements such as a dropped kerb construction to accommodate refuse collection etc. • Promote all necessary Traffic Regulation Orders. • Upgrade street lighting to current LBS standards Please contact George Livingstone at George.Livingstone@southwark.gov.uk for further details. Investigate the possibility of providing lamp columns mounted to the building in order to improve effective footway widths. • Any new tree pits should be constructed in accordance with SSDM standards and the Council's Tree Services team should be consulted on any new planting on or adjacent to the public highway. 	Agreed

	<ul style="list-style-type: none"> Refresh road markings following kerb installation. <p>Rectify any damaged footways, kerbs, inspection covers and street</p>	
TfL Obligations	<p>TfL requested financial obligations</p> <ul style="list-style-type: none"> Bus contribution of £459,000 (based on £2700 per home) TfL Cycle Hire Docking Station Contribution of £8,500 (based on £50 per home) along with free membership 	Agreed
TfL s.278	<ul style="list-style-type: none"> The delivery of the OKR Healthy Streets scheme via an appropriate design/layout Carriageway works Footway and junctions including any associated bus, walking and cycling infrastructure and other related works 	
Parking permit restriction	This development would be excluded from those eligible for car parking permits under any future CPZ operating in this locality.	Agreed
Car club membership	Three year membership to new residents to car clubs operating in the area.	Agreed
Delivery and Service Plan	DSP bond contribution of £17,019.76 (£100 per resi unit + £100 per 5,000 sqm of new commercial).	Agreed
Pavement	Public Realm and highway improvements to include footways paved with precast concrete paving slabs with 150mm wide silver grey granite natural stone kerbs.	Agreed
Intersection upgrades	A proportionate financial contribution towards a Toucan crossing on Surrey Canal Road and the provision of a crossing across the commercial entrance on Rollins Street as per the recommendations of the Road Safety Audits.	Agreed
CCTV	Funding of an enforcement camera to monitor access on Surrey Canal Road.	Agreed
Energy, Sustainability and the Environment		
Futureproofing for connection	Prior to occupation, a CHP Energy Strategy must be approved setting out how the development will be	Agreed

to District Heat Network (DHN)	designed and built so that it will be capable of connecting to the District CHP in the future.	
Carbon	<ul style="list-style-type: none"> • An off-set payment of £208,444 • Review and re-calculation of on-site savings following detailed design stage • Be Seen Monitoring 	Agreed
Archaeology monitoring/supervision fund	£11,171 towards Archaeological monitoring	Agreed
Open Space	£119,925 contribution towards public open spaces within the OKROA	Agreed
Other obligations		
Architects	Securing Stitch Architects to deliver the building detailed design, unless otherwise agreed in writing	Agreed
Other	<ul style="list-style-type: none"> • Unless otherwise agreed with the council, not to use any part of the development as a betting shop, pawnbrokers or pay day loan shop should Jewson leave the property • Bookable internal community room 	Agreed
Administration fee	Maximum contribution to cover the costs of monitoring these necessary planning obligations, calculated as 2% of total sum	Agreed

296. The S106 heads of terms agreed would satisfactorily mitigate against the adverse impacts of the proposed development.
297. In the event that a satisfactory legal agreement has not been entered into by 18 April 2023, it is recommended that the Director of Planning refuses planning permission, if appropriate, for the following reason:

“The proposal, by failing to provide for appropriate planning obligations secured through the completion of a S106 agreement, fails to ensure adequate provision of affordable housing and mitigation against the adverse impacts of the development through projects or contributions that is contrary to Southwark Plan policy IP3 (‘Community Infrastructure Levy (CIL) and Section 106 Planning Obligations’), Policy DF 1 Planning Obligations of the London Plan (2021) and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015)”.

Mayoral and Southwark Community Infrastructure Levy (CIL)

298. 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.
299. The site is located within Southwark CIL zone 2 and MCIL2 Band 2 zone. Based on the applicant’s CIL Form 1 (GIA) dated 9.8.2022, the gross amount of CIL is approximately **£5,334,253.69** (pre-relief). Subject to the correct CIL forms being submitted on time, CIL Social Housing Relief can be claimed for a number of types of affordable housing. Based on Form 1, the CIL estimate is revised to **£3,283,173.16** if Social Housing Relief is successfully claimed for. It should be noted that this is an estimate, and floor areas will be checked when related CIL Assumption of Liability and Relief Claim Forms are submitted, after planning approval has been obtained.

OTHER MATTERS

300. None

COMMUNITY INVOLVEMENT AND ENGAGEMENT

301. Southwark’s Draft Statement of Community Involvement and Development Consultation Charter encourages consultation with local communities, especially developers seeking permission for ‘Major/Large Scale’ developments. The Charter is a guide setting out the consultation requirements to be carried out by developers for proposed development.
302. A Statement of Community Involvement has been submitted along with the application. It is noted that during the time frame of this application from the first pre-app meeting with Southwark Council in April 2020, that the ability to hold public forums with respect to consultation was severely limited due to the Covid-19 pandemic.
303. It was advised during pre-app discussions with Southwark officers that the most effective way to receive feedback from the local community regarding the development would be in the form of a website consultation page.
304. With the advice of Southwark officers, an online public consultation was held in summer 2020. This was well advertised on the Old Kent Road regeneration website that is regularly updated and maintained by Southwark. The scheme was communicated to visitors by a narrated video showing visualisations and diagrams of the developing proposal. Further public consultation was also held on an independent online website where the public was invited to view and comment on the scheme.
305. As stated previously in this report, the proposals were subject to two rounds of scrutiny at the Design Review Panel, and was also scrutinised by members of the Southwark Community Review Panel. Given the above, it is considered that due to the extenuating circumstances of the Covid-19 pandemic, the efforts to source public feedback on the development proposals was acceptable in meeting the aims and

objectives of Southwark's Draft Statement of Community Involvement and Development Consultation Charter

Human rights implications

306. 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.
307. This application has the legitimate aim of delivering a mixed-use development. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

CONCLUSION ON PLANNING ISSUES

308. The development will re-provide an existing business on an improved floorspace along with 170 residential homes. 61 of the new homes will be affordable, equating 40.3% by habitable rooms. This is a significantly positive aspect of the scheme.
309. All residential units have access to large private amenity spaces in the form of balconies or winter gardens. The scheme also benefits from two communal amenity spaces which meets all requirements for communal and children's playspace on site, with the communal amenity spaces being accessible to all residents within the development.
310. The quality of the proposed residential accommodation is considered to be positive, meeting or exceeding the minimum space standards and providing 58.24% dual aspect accommodation. The proposal also provides a range of housing choices from one to four-bedroom properties, including 20.6% family homes (including 14 four-bedroom homes within the social rent), and 10.5% wheelchair housing by habitable room.
311. The development will achieve 66% on-site carbon emissions, with the deficit being captured by way of a financial contribution. In addition, the proposal involves the loss of four trees (two Category B and two Category C trees), albeit 21 new trees with greater variety, as well as physical and visual value are proposed, with conditions to secure adequate replacement and protection measures.
312. The proposed development would reduce car dependency whilst significantly increasing cycle provision within the development. The increased width of the public footway along both frontages is anticipated to significantly enhance the public realm and improve the pedestrian experience through comfort and circulation when entering, visiting or moving past the site.
313. 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.

314. The proposed development would be of a high quality of architecture, and is considered to enhance the existing appearance of the subject site whilst referencing the surrounding context. The design has ensured that there would be depth and articulation to facades of the development.
315. It is therefore recommended that planning permission be granted subject to conditions, referral to the Mayor of London, and the agreement of a Section 106 Legal Agreement under the terms as set out above.

Consultation responses from external and statutory consultees

316. This application was subject to a round of statutory consultation in January/February 2022.

317. Greater London Authority have made the following comments:

- The redevelopment of the Jewson builders merchant site is strongly supported in land-use terms in accordance Policies E4, E6, E7, H1 and Objective GG2 of the London Plan 2021
- The scheme is proposing 40.3% affordable housing with a tenure mix of 63% social rent and 27% London shared ownership and would qualify for the Fast Track Route, subject to the Council's acceptance of the tenure mix and the applicant demonstrating engagement with a registered provider and consideration of grant funding.
- No harm would be caused to the nearby heritage assets; height, massing and layout are generally supported and given the site's location within an area identified for tall buildings in the local plan the application generally complies with London Plan Policy D9.
- The applicant is required to continue discussions with TfL and Southwark on Healthy Streets and with Southwark regarding the ATZ assessment; cycle parking should be amended to accord with LCDS; and contributions towards improvements to the bus network and expansion of the TfL cycle hire scheme appropriately secured, as well as the various transport-related plans highlighted in this report.
- Additional information on the energy strategy, WLC assessment and circular economy statement is required as detailed in the technical memos provided to the applicant; and post-construction monitoring and a carbon off-set contribution is also to be secured.

Officer comment: Conditions for cycle parking in accordance with LCDS standards, and conditions regarding WLC, CES and Energy have been secured by condition. Notwithstanding this, negotiations will continue with the GLA at the Stage 2 process post planning committee.

318. Transport for London have made the following comments:

The applicant will be expected to enter in to a S278 agreement (covering carriageway, footway and junctions including any associated bus, walking and cycling infrastructure and other related works) to deliver improvements to the pedestrian, cycling and public transport environment in accordance with the Healthy Streets scheme being developed. TfL will provide a map showing the area to be covered by the S278 and the wording that should accompany this map in a separate e-mail.

- A contribution of £2,700 per residential unit is sought towards improvements to the bus network in accordance with Policy T4 of the London Plan. This is in line with the agreement for all other sites in the OKR area. A Section 106 contribution of £985,000, calculated on a pro-rata basis, will also be sought towards the delivery of a new London Overground station, known as 'Surrey Canal', and works to support frequency improvements along East London Line in line with Policy T4. The new station will bring rail travel within easy reach of occupiers and visitors to this development, including those with mobility needs as it will have step free access, and the frequency increase on the Clapham Junction branch to 6 trips per hour, rather than 4, would increase capacity significantly.
- It is proposed that the non-residential element would be accessed via Rollins Street and the residential element via a new vehicular access on Surrey Canal Road. The applicant should justify why the existing access from Rollins Road cannot be used for both the residential and non-residential uses, as well as demonstrate how this proposed vehicle access would support the planned improvements for this junction that are aimed at enabling bus services to run along Surrey Canal Road.
- A total of 322 long-stay and 6 short-stay cycle parking spaces for the residential element are to be provided, along with 8 long-stay and 4 short-stay for the commercial element. This quantum accords with the minimum standards in terms of quantity as set out London Plan Policy T5; however, the proposals do not meet the required quality in accordance with London Cycle Design Standards (LCDS) and should be addressed prior to the Mayor's final determination of the application to ensure full compliance with Policy T5. As proposed, it would appear that a large part of the route between Block A and the cycle parking requires use of the public footway and even for Block B the route is convoluted.
- Regarding disabled persons' parking, 2 spaces are proposed for the residential element. This is equivalent to 1% of residential dwellings having access to a disabled person parking space at the outset, whereas London Plan Policy T6.1 states that proportion should be 3% and the identification of additional spaces for disabled people equivalent to another 7% of homes should demand arise. To address this, the general car parking being proposed for the non-residential element could instead be used to provide additional disabled persons' parking provision. For non-compliant disabled persons' parking provision to be considered acceptable, the suitability of the routes to key trip attractors for pedestrians from all walks of life should be demonstrated. It should also be demonstrated that spaces have been identified, and agreed with the Council, for suitable on-street provision should demand rise. Additionally, a range of good step-free alternatives to the use of a car for disabled persons must be secured and Section 106 contributions to mitigate any shortfall in car parking for disabled people.
- A parking design and management plan should be secured to ensure that parking is used only by disabled people and allocation is on the basis of need and not tied to particular homes or jobs. The applicant is encouraged to provide active electric vehicle charging facilities for all parking, including on-street spaces.

- A robust assessment of delivery and servicing demand for this development should be undertaken, as there is a concern that this is currently being underestimated. A full delivery and servicing plan should be secured through condition. The applicant is encouraged to consider the introduction of sustainable freight facilities, such as cargo bike loading areas and charging for electric or hybrid service vehicles. A full construction logistics plan should also be secured by condition. This should be prepared in line with TfL guidance and provide details on how the impacts on the surrounding transport network would be minimised and adherence to Vision Zero.

Officer response: The comments from TfL are noted. In respect of the s278, LBS are the highways authority for the road adjacent to the site and will determine the extent of the s278 agreement. Conditions relating to cycle parking and delivery and servicing plans have been secured in the decision notice attached, along with the requirement of ECV's and the S106 Agreement will have an obligation where no resident will be able to apply for a parking permit.

Officers do not agree with TfL that the development needs to provide a payment to the delivery of the New Bermondsey Overground Station located in the London Borough of Lewisham. When the OKROA was outlined an agreement was in place whereby new residential development within Southwark would contribute £2,700 per residential unit towards the improvement of bus services in the area through S106 payments. The draft AAP also identifies the Community Infrastructure Levy payments will contribute to the delivery of the BLE. These remain the councils agreed priorities. In addition in respect of the phasing of OKRD TfL have confirmed that they do not consider that the presence of the existing South Bermondsey station or the proposed New Bermondsey station would justify changing the calculation of the phasing in the OKRD AAP. As no agreement was put in place to fund the New Bermondsey Overground Station development in the councils draft OKRD AAP this contribution will not be sought for the S106 Agreement.

319. Metropolitan Police: Comments made.

I can confirm that I have held a meeting with the design team dealing with this development at which the principles of Secured by Design were discussed. It is encouraging to see that the designers have considered Secured by Design, and I believe that this will result in a positive impact upon the development from a safety and security perspective. Continued liaison with a designing out crime officer will enhance this.

The design of the development has considered opportunity for natural surveillance, incorporates excellent lines of site and the development should 'activate' this area. These are all excellent crime prevention measures.

The ground floor footprint has also been designed in such a way that there are no alcoves or secluded areas that are often crime and ASB generators. This, again, is extremely positive in relation to crime prevention.

Lighting within the schemes public realm areas should conform to lighting standard BS 5489:2103. This lighting standard is particularly important in regard to preventing

offences of violence against women and girls. Good levels of light are known to assist in preventing this type of offending as well as giving confidence to persons using the spaces in the hours of darkness.

The proposal includes a service/parking yard for the use of Jewson customers. There is an increase in theft of and from works vans, with tools and materials regularly being targeted. This yard, therefore, should be lit to the public realm standard detailed earlier and should be provided with full CCTV coverage. To assist with securing the yard at night, the car park should be gated and locked each evening. The height of these gates and boundary should be a minimum of 2.2m in height and care should be taken in designing them to ensure there are no climbing aids to assist potential offenders.

There is also a bulk storage area shown within the yard. This is a potential target for large scale theft and should be appropriately secured with a robust boundary, gates and CCTV coverage. The details of this can be discussed as the design progresses.

Officer response: The requested condition has been included on the draft decision notice and it is expected that the outstanding design measures requested by the Secured by Design officer will be submitted as part of the condition discharge.

320. London Fire Brigade: No further observations.

The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (The Order) in London.

The London Fire Brigade (LFB) has been consulted with regard to the above-mentioned premises and have no further observations to make. It should be ensured that if any material amendments to this consultation is proposed, a further consultation may be required.

Officer comment: Noted

321. Health and Safety Executive: No response to consultation request.

322. Historic England (HE):

Historic England confirmed they do not have any comments to make on this development

Officer comment: Noted

323. Natural England: No comments.

Officer response: Noted.

324. Environment Agency

We have **no objection** to the planning application as submitted, **subject to the following conditions** being imposed on any planning permission granted. Without

these conditions, the proposed development on this site poses an unacceptable risk to the environment and we would wish to object to the planning application.

Officer comment: Recommended conditions and informatives are attached to the decision notice accompanying this report.

325. Arqiva: No response provided by Arqiva from consultation request.

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

Officer comment: Comments noted and recommended informative attached to the accompanying decision notice.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

327. N/A

REASONS FOR LATENESS

328. N/A

REASONS FOR URGENCY

329. N/A

BACKGROUND INFORMATION

BACKGROUND DOCUMENTS

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

APPENDICES

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

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth	
Report Author	Troy Davies, Team Leader	
Version	Final	
Dated	05 October 2022	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
Date final report sent to Constitutional Team		06 October 2022

APPENDIX 1: RECOMMENDATION

Applicant	Twenty Twenty Ilderton Wharf Limited and SGBD		
Application Type	Full Planning Application		
Recommendation	Grant subject to S106 Agreement	Case Number	21/AP/4757

Draft of Decision Notice

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

Demolition of existing buildings and erection of a mixed use development comprising a building of part 9, 23 and 25 storeys above ground to provide a replacement builders merchants with associated office, trade counter sales area , showroom and external storage/racking, a commercial unit fronting Ilderton Road (Use Class E) 170 residential apartments (Use Class C3) and other associated infrastructure.

At: ILBERTON WHARF, 1-7 ROLLINS STREET, SE15, 1EP

In accordance with application received on 30/12/2021

1 **Approved Plans**

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

20210-STCH-XX-ZZ-DR-A-1003 EXISTING SITE ELEVATION
 20210-STCH-XX-ZZ-DR-A-1004 EXISTING SITE ELEVATION
 20210-STCH-XX-ZZ-DR-A-1005 EXISTING SITE SECTION AA AND BB
 20210-STCH-XX-ZZ-DR-A-1006 EXISTING PLAN AND ELEVATIONS
 20210-STCH-XX-ZZ-DR-A-1007 EXISTING PLAN AND ELEVATIONS

20210-STCH-XX-RF-DR-A-1050 REV P04 PROPOSED SITE PLAN – LOWER GROUND FLOOR
 20210-STCH-XX-RF-DR-A-1051 REV P03 PROPOSED SITE PLAN – ROOF PLAN
 20210-STCH-XX-00-DR-A-1052 REV P02 PROPOSED SITE PLAN – BOUNDARY TREATMENTS

20210-STCH-XX-00-DR-A-1100 REV P03 PROPOSED LOWER GROUND FLOOR PLAN
 20210-STCH-XX-0U-DR-A-1101 REV P02 PROPOSED UPPER GROUND PLAN
 20210-STCH-XX-01-DR-A-1102 REV P02 PROPOSED FIRST FLOOR PLAN
 20210-STCH-XX-02-DR-A-1103 REV P02 PROPOSED SECOND FLOOR PLAN
 20210-STCH-XX-03-DR-A-1104 REV P02 PROPOSED THIRD FLOOR PLAN
 20210-STCH-XX-04-DR-A-1105 REV P02 PROPOSED FOURTH FLOOR PLAN
 20210-STCH-XX-05-DR-A-1106 REV P02 PROPOSED FIFTH FLOOR PLAN
 20210-STCH-XX-06-DR-A-1107 REV P02 PROPOSED SIXTH FLOOR PLAN
 20210-STCH-XX-07-DR-A-1108 REV P02 PROPOSED SEVENTH FLOOR PLAN

20210-STCH-XX-08-DR-A-1109 REV P01 PROPOSED EIGHTH FLOOR PLAN
 20210-STCH-XX-09-DR-A-1110 REV P01 PROPOSED NINTH FLOOR PLAN
 20210-STCH-XX-10-DR-A-1111 REV P01 PROPOSED TENTH FLOOR PLAN
 20210-STCH-XX-11-DR-A-1112 REV P01 PROPOSED ELEVENTH FLOOR
 20210-STCH-XX-12-DR-A-1113 REV P01 PROPOSED TWELFTH FLOOR PLAN
 20210-STCH-XX-13-DR-A-1114 REV P01 PROPOSED THIRTEENTH FLOOR PLAN
 20210-STCH-XX-14-DR-A-1115 REV P01 PROPOSED FOURTEENTH FLOOR PLAN
 20210-STCH-XX-15-DR-A-1116 REV P01 PROPOSED FIFTEENTH FLOOR PLAN
 20210-STCH-XX-16-DR-A-1117 REV P01 PROPOSED SIXTEENTH FLOOR PLAN
 20210-STCH-XX-17-DR-A-1118 REV P01 PROPOSED SEVENTEENTH FLOOR PLAN
 20210-STCH-XX-18-DR-A-1119 REV P01 PROPOSED EIGHTEENTH FLOOR PLAN
 20210-STCH-XX-19-DR-A-1120 REV P01 PROPOSED NINETEENTH FLOOR PLAN
 20210-STCH-XX-20-DR-A-1121 REV P01 PROPOSED TWENTIETH FLOOR PLAN
 20210-STCH-XX-21-DR-A-1122 REV P01 PROPOSED TWENTY FIRST FLOOR PLAN
 20210-STCH-XX-22-DR-A-1123 REV P01 PROPOSED TWENTY SECOND FLOOR PLAN
 20210-STCH-XX-23-DR-A-1124 REV P01 PROPOSED TWENTY THIRD FLOOR PLAN
 20210-STCH-XX-24-DR-A-1125 REV P01 PROPOSED ROOF LEVEL PLAN
 20210-STCH-XX-24-DR-A-1125 REV P01 PROPOSED ROOF LEVEL PLAN
 20210-STCH-XX-24-DR-A-1126 REV P01 PROPOSED ROOF PLAN

20210-STCH-XX-ZZ-DR-A-1200 REV P01 PROPOSED NORTH ELEVATION
 20210-STCH-XX-ZZ-DR-A-1201 REV P01 PROPOSED EAST ELEVATION
 20210-STCH-XX-ZZ-DR-A-1202 REV P02 PROPOSED SOUTH ELEVATION
 20210-STCH-XX-ZZ-DR-A-1203 REV P02 PROPOSED WEST ELEVATION
 20210-STCH-XX-ZZ-DR-A-1204 REV P01 PROPOSED SITE ELEVATION – WEST
 20210-STCH-XX-ZZ-DR-A-1205 REV P01 PROPOSED SITE ELEVATION – NORTH

20210-STCH-XX-ZZ-DR-A-1300 REV P01 PROPOSED BUILDING SECTION AA
 20210-STCH-XX-ZZ-DR-A-1301 REV P01 PROPOSED BUILDING SECTION BB
 20210-STCH-XX-ZZ-DR-A-1302 REV P01 PROPOSED BUILDING SECTION CC
 20210-STCH-XX-ZZ-DR-A-1303 REV P01 PROPOSED BUILDING SECTION DD
 20210-STCH-XX-ZZ-DR-A-1304 REV P01 PROPOSED BUILDING SECTION EE
 20210-STCH-XX-ZZ-DR-A-1305 REV P01 PROPOSED BUILDING SECTION FF

Reason:

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

Permission is subject to the following Time Limits:

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

Reason:

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

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

3 **Archaeological Evaluation**

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

Reason:

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

4 **Archaeological Mitigation**

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

Reason:

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

5 **Archaeological Foundation Design**

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

Reason:

In order that all below ground impacts of the proposed development are known and an appropriate protection and mitigation strategy is achieved to preserve archaeological remains by

record and/or in situ in accordance with Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2021.

6 **Construction Environmental Management Plan (CEMP)**

No development shall take place, including any works of demolition, until a written CEMP has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall oblige the applicant, developer and contractors to commit to current best practice with regard to construction site management and to use all best endeavours to minimise off-site impacts, and will include the following information:

A detailed specification of demolition and construction works at each phase of development including consideration of all environmental impacts and the identified remedial measures;

Site perimeter continuous automated noise, dust and vibration monitoring;

Engineering measures to eliminate or mitigate identified environmental impacts e.g. hoarding height and density, acoustic screening, sound insulation, dust control measures, emission reduction measures, location of specific activities on site, etc.;

Arrangements for a direct and responsive site management contact for nearby occupiers during demolition and/or construction (signage on hoardings, newsletters, residents liaison meetings, etc.)

A commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme; Site traffic - Routing of in-bound and outbound site traffic, one-way site traffic arrangements on site, location of lay off areas, etc.;

Site waste Management - Accurate waste stream identification, separation, storage, registered waste carriers for transportation and disposal at appropriate destinations.

A commitment that all NRMM equipment (37 kW and 560 kW) shall be registered on the NRMM register and meets the standard as stipulated by the Mayor of London

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

Southwark Council's Technical Guide for Demolition & Construction at <http://www.southwark.gov.uk/construction>

Section 61 of Control of Pollution Act 1974,

The London Mayors Supplementary Planning Guidance 'The Control of Dust and Emissions During Construction and Demolition',

The Institute of Air Quality Management's 'Guidance on the Assessment of Dust from Demolition and Construction' and 'Guidance on Air Quality Monitoring in the Vicinity of Demolition and Construction Sites',

BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Noise',

BS 5228-2:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Vibration'

BS 7385-2:1993 Evaluation and measurement for vibration in buildings. Guide to damage levels from ground-borne vibration,

BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings - vibration sources other than blasting,

Relevant Stage emission standards to comply with Non-Road Mobile Machinery (Emission of Gaseous and Particulate Pollutants) Regulations 1999 as amended & NRMM London emission standards <http://nrmm.london/>

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

Reason

To ensure that occupiers of neighbouring premises and the wider environment do not suffer a loss of amenity by reason of pollution and nuisance, in accordance with Policy P56 'Protection of amenity' of the Southwark Plan (2022), and the National Planning Policy Framework (2021).

7 **Site Contamination**

Prior to the commencement of any development, excluding demolition and site clearance:

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

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

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

Reason:

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P64 (Contaminated land and hazardous substances), and the National Planning Policy Framework 2021.

8 **Drainage**

No works (excluding demolition and site clearance) shall commence until full details of the proposed surface water drainage system incorporating Sustainable Drainage Systems (SuDS) have been submitted to and approved in writing by the Local Planning Authority, including detailed design, size and location of attenuation units and details of flow control measures. The strategy should achieve a reduction in surface water runoff rates during the 1% Annual Exceedance Probability (AEP) event plus climate change allowance, as detailed in the Sustainable Drainage Statement prepared by BWB (ref: JIR-BWB-ZZ-XX-RP-CD-0001_SDS-S2-P05, dated March 2022). The applicant must demonstrate that the site is safe in the event of blockage/failure of the system, including consideration of exceedance flows.

Reason:

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

9 **Access for Fire Appliances**

Details of access for fire appliances as required by part 5B of the Building Regulations and details of adequate water supplies for fire-fighting purposes should be provided prior to the implementation of the development (excluding demolition and site clearance) and should be secured in perpetuity on completion of the development.

Reason:

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

10 **Circular Economy Statement**

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

Reason:

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

11 **Piling Risk Assessment**

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

Reason:

To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in line with paragraph 174 of the National Planning Policy Framework.

12 Tree Planting

Prior to works commencing (excluding demolition and site clearance), full details of all proposed tree planting (totalling **21 trees** unless otherwise agreed with the local planning authority) shall be submitted to and approved in writing by the Local Planning Authority. This will include tree pit cross sections, available soil volumes, planting and maintenance specifications, use of guards or other protective measures and confirmation of location, species, sizes, nursery stock type, supplier and defect period. All tree planting shall be carried out in accordance with those details and at those times.

All trees and shrubs will conform to the specification for nursery stock as set out in British Standard 3936 Parts 1 (1992) and 4 (1984). Advanced Nursery stock trees shall conform to BS 5236 and BS: 4428 Code of practice for general landscaping operations.

If any tree, or any tree planted in replacement for it, is removed, uprooted or destroyed or dies, or becomes, in the opinion of the local planning authority, seriously damaged or defective, another tree of the same species and size as that originally planted shall be planted at the same place in the first suitable planting season, unless the local planning authority gives its written consent to any variation.

Reason:

To ensure the proposed development will preserve and enhance the visual amenities of the locality and is designed for the maximum benefit of local biodiversity, in addition to the attenuation of surface water runoff in accordance with The National Planning Policy Framework 2021 Parts 8, 11, 12, 15 and 16; Policies G1 (Green Infrastructure, G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021; and policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards and the following policies of The Southwark Plan (2022): P56 Protection of Amenity, P21 Conservation of the Historic Environment and Natural Heritage, P60 Biodiversity, and P61, Trees.

13 Agent of change

Prior to commencement of construction (excluding demolition and site clearance), an acoustic assessment shall be submitted to the Local Planning Authority to assess the impact of commercial noise from surrounding commercial operations on future occupants of the development. The assessment shall be conducted in accordance with BS4142:2014+A1-2019. The assessment shall include a review of currently proposed acoustic, ventilation, and overheating mitigation measures and a scheme of further or enhanced mitigation measures as may be necessary to ensure that future occupants do not suffer significant adverse impacts, and other adverse impacts are mitigated and minimised. Once approved the mitigation measures shall be implemented in full and permanently maintained thereafter.

Reason:

To ensure that occupiers of proposed dwellings do not suffer a loss of amenity by reason of noise nuisance due to commercial noise in accordance with the National Planning Policy Framework 2021, and Policies P56 Protection of Amenity and Policy P66 Reducing noise pollution and enhancing soundscapes of the Southwark Plan (2022).

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

14 **Hard and Soft Landscaping**

Before any above grade work hereby authorised begins (excluding demolition and site clearance), detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings (including cross sections, available rooting space, tree pits, surfacing materials of any parking, access, or pathways layouts, materials and edge details including buffer details to residential units abutting amenity spaces), shall be submitted to and approved in writing by the Local Planning Authority. The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use of the building.

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

Reason:

So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2021, policy D4 ('Delivering good design') of the London Plan 2021 and policies P13 ('Design of places'), P14 ('Design quality') and P59 ('Green infrastructure') of the Southwark Plan 2022.

15 **Biodiverse Roofs**

Before any biodiverse roofs are installed, details of the biodiversity (green/brown) roof(s) for that phase shall be submitted to and approved in writing by the Local Planning Authority. The biodiversity (green/brown) roof(s) shall be:

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

The biodiversity (green/brown) roof(s) shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape

in case of emergency. The biodiversity roof(s) shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.

Full Discharge of this condition will be granted for each phase once the green/brown roof(s) for that phase are completed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the roof has been constructed to the agreed specification.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with: Policies SI 4 (Managing heat risk), SI 13 (Sustainable drainage), G1 (Green Infrastructure), G5 (Urban Greening) of the London Plan 2021; Policy P59 (Green Infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

16 **Landscape Management Plan**

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

Reason:

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

17 **Swift Bricks/Bat Bricks**

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

No less than 24 swift bricks and 12 bat bricks shall be provided and the details shall include the exact location, specification and design of the habitats. The bricks shall be installed within the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with Chapter 15 (Conserving and enhancing the natural environment) of the National Planning Policy Framework (2021); Policy G6 (Biodiversity and access to nature) of the London Plan (2021); P56 Protection of amenity, P57 Open space, P58 Open Water space, P59 Green infrastructure, P60 Biodiversity, P66 Reducing noise pollution and enhancing soundscapes and P69 Sustainable standards of the Southwark Plan (2022).

18 **Secure By Design**

Prior to the commencement of any above grade works (excluding demolition and site clearance), details of external security measures shall be submitted and approved in writing by the Local Planning Authority and any such security measures shall be implemented prior to occupation in accordance with the approved details which shall seek to achieve the 'Secured by Design' accreditation award from the Metropolitan Police.

Reason:

In pursuance of the Local Planning Authority's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention, in accordance with: the National Planning Policy Framework 2021 and Southwark Plan 2022 policy P16 ('Designing out crime').

19 **Materials Schedule and On-Site Presentation of Samples**

Prior to the commencement of any above grade works (excluding demolition and site clearance), samples of all external facing materials and full-scale (1:1) mock-ups of the facades to be used in the carrying out of this permission shall be presented on site to the Local Planning Authority and approved in writing. The development shall not be carried out otherwise than in accordance with any such approval given. The facades to be mocked up should be agreed with the Local Planning Authority.

Reason:

In order that the Local Planning Authority may be satisfied that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing, are suitable in context and consistent with the consented scheme in accordance with: the National Planning Policy Framework 2021, policies P13 ('Design of places') and P14 ('Design quality') of the Southwark Plan 2022 and policy D4 ('Delivering good design') of the London Plan 2021.

20 **Design Mock-ups**

Prior to commencement of any works above grade (excluding demolition and site clearance), detailed drawings at a scale of 1:5 or 1:10 through:

- i) all facade variations; and
- ii) commercial fronts and residential entrances; and
- iii) all parapets and roof edges; and
- iv) all balcony details; and
- v) heads, cills and jambs of all openings

to be used in the carrying out of this permission shall be submitted to and approved by the Local Planning Authority in writing. The development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order that the Local Planning Authority may be satisfied as to the design and details in accordance with the NPPF 2021, policies P13 ('Design of places') and P14 ('Design quality') of the Southwark Plan 2022 and policy D4 ('Delivering good design') of the London Plan 2021.

21 **Play Spaces**

i) Before any playspaces are installed within the development hereby approved, the developer shall submit details of all the play spaces proposed, including 1:50 scale detailed drawings for approval by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with any such approval given and retained as such.

ii) No later than 6 months prior to occupation of each phase, details of the play equipment to be installed within that phase shall be submitted to and approved in writing by the Local Planning Authority. The play equipment shall be provided in accordance with the details thereby approved prior to the occupation of the residential units within that phase. All ground floor amenity and playspace within the development shall be available to all residential occupiers of the development in perpetuity.

Reason:

In order that the Council may be satisfied with the details of the play strategy, in accordance with The National Planning Policy Framework 2021, S4 of the London Plan 2021 and P15 of the Southwark Plan 2022.

22 **Wheelchair housing**

Prior to the commencement of works above grade (excluding demolition and site clearance), the developer shall submit written confirmation from the appointed building control body that the specifications for each dwelling identified in the detailed construction plans for that phase meet the standard of the Approved Document M of the Building Regulations (2015) required in the schedule below and as corresponding to the approved floor plans. The development shall be carried out in accordance with the details thereby approved by the appointed building control body.

M4 (Category 2) 'accessible and adaptable':- up to 90%

M4 (Category 3)(2)(a) 'wheelchair adaptable'.- at least 10%

Reason:

In order to ensure the development complies with P8 Wheelchair accessible and adaptable housing of the Southwark Plan and D7 of the London Plan 2021.

23 **Digital Connectivity**

Prior to any above grade works of the development hereby approved (excluding demolition and site clearance), detailed plans shall be submitted to and approved in writing by the local planning authority demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within that phase of development. The development shall be carried out in accordance with these plans and maintained as such in perpetuity.

Reason:

To comply with SI 6 of the London Plan 2021.

24 Lifts

Prior to commencement of works above grade of the development hereby approved (excluding demolition and site clearance), detailed drawings shall be submitted to demonstrate that a suitably-sized evacuation lift (in addition to a firefighting lift) can and will be provided in each residential core within that phase of development. Once approved, the development shall be constructed in accordance with the approved drawings and maintained for as long as the development is occupied.

Reason:

In order to comply with London Plan 2021 Policy D5 Inclusive Design.

25 Sprinkler System

Prior to the commencement of any above grade works (excluding demolition and site clearance), full particulars of the sprinkler system to be used within the ground floor commercial units shall be submitted to and approved by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with any approval given.

Reason:

To ensure that there is an adequate level of fire safety within this mixed use development.

26 Solar Glare

Prior to the commencement of any above grade works (excluding demolition and site clearance), details of the specification of glass with an appropriate reflectivity, demonstrating that levels of glare would be reduced to a tolerable level at all times, to be used in the carrying out of this permission shall be submitted to and approved by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

To ensure that occupiers of neighbouring premises or the surrounding public realm do not suffer a loss of amenity by reason of harmful glare in accordance with the National Planning Policy Framework 2021, and Policy P56 Protection of Amenity of the Southwark Plan 2022.

Pre-occupation condition(s) - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before the building(s) hereby permitted are occupied or the use hereby permitted is commenced.

27 Car Free Marketing

Prior to occupation of the development, details of the marketing materials for sale and rental properties shall be submitted and approved in writing by the local planning authority clearly identifying the development as car free (excluding the permitted designated blue badge spaces)

Reason:

To ensure compliance with P54 of the Southwark Plan 2022.

28 Signage

Prior to occupation of the commercial space, a signage strategy for that unit shall be submitted and approved in writing and the works shall only be carried out in accordance with the approved details.

Reason:

In order that the Local Planning Authority may be satisfied as to the quality of the design and details, and to ensure a satisfactory townscape environment in accordance with P14 of the Southwark Plan 2022.

29 Circular Economy Post Completion Report

Prior to occupation of the development, a Post Completion Report setting out the predicted and actual performance against all numerical targets in the relevant Circular Economy Statement for that phase shall be submitted to the GLA at: CircularEconomyLPG@london.gov.uk, along with any supporting evidence as per the GLA's Circular Economy Statement Guidance.

The Post Completion Report shall provide updated versions of Tables 1 and 2 of the Circular Economy Statement, the Recycling and Waste Reporting form and Bill of Materials. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, and prior to occupation.

Reason:

In the interests of sustainable waste management and in order to maximise the re-use of materials.

30 Whole Life Cycle

Once the as-built design has been completed for the development (upon commencement of RIBA Stage 6) and prior to the building(s) being occupied (or handed over to a new owner, if applicable), the legal owner(s) of the development should submit the post-construction Whole Life-Cycle Carbon (WLC) Assessment for that phase to the GLA at: ZeroCarbonPlanning@london.gov.uk.

The owner should use the post construction tab of the GLA's WLC assessment template and this should be completed accurately and in its entirety, in line with the criteria set out in the GLA's WLC Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the

guidance and should be received three months post as-built design completion, unless otherwise agreed.

Reason:

To ensure whole life-cycle carbon is calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan 2021.

31 Electric Vehicle Charging Points

Prior to occupation of the development, the developer shall submit plans to show delivery of all electric vehicle charging points for the commercial and residential parking bays. The development must be implemented in accordance with the approval given.

Reason:

To encourage more sustainable travel in accordance with The National Planning Policy Framework 2021 in accordance with P54 Car Parking of the Southwark Plan 2022.

32 Cycle Storage Facilities

Prior to first occupation of the development hereby consented, and notwithstanding the approved drawings, details (1:50 scale drawings) of the facilities to be provided for the secure and covered storage of cycles for that phase shall be submitted to and approved in writing by the Local Planning Authority.

Thereafter the approved cycle parking facilities provided shall be retained and the space used for no other purpose, and the development shall not be carried out other in accordance with any such approval given.

Reason:

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

33 Integral blinds

Prior to occupation of the development, details of suitable integral blinds to all habitable rooms (which do not clash with opening windows) shall be submitted to and approved by the local Planning Authority and once approved shall installed as approved and permanently maintained thereafter.

Reason:

To ensure that the development is designed to mitigate future changes in climate and ensure occupiers of the development do not suffer a loss of amenity by reason of overheating and excess noise in accordance with the Southwark Plan 2022 Policy P14 (Design Quality) , Policy P56

(Protection of amenity), P69 (Sustainability Standards) and the National Planning Policy Framework 2021.

34 **Internal Noise Levels**

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

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

Living and Dining rooms- 35dB LAeq T †

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

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

Following completion of the development and prior to occupation, a validation test shall be carried out on a relevant sample of premises. The results shall be submitted to the LPA for approval in writing. The approved scheme shall be implemented and permanently maintained thereafter.

Reason:

To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2021.

35 **Vertical Sound Transmission**

Prior to occupation, party walls, floors and ceilings between the commercial premises and residential dwellings shall be so adapted as necessary in light of the intended commercial use in order to provide reasonable resistance to the transmission of sound sufficient to ensure that noise due to the commercial premises does not exceed NR20 when measured as an LAeq across any 5 minute period in any habitable room.

Following completion of the development and prior to occupation, a validation test shall be carried out on a relevant sample of premises. The results shall be submitted to the LPA for approval in writing and the approved scheme shall be permanently maintained thereafter.

Reason:

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities within the commercial premises in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2021.

36 **Refuse Storage Facilities**

Before the first occupation of any part of the development hereby approved, the refuse storage arrangements shown on the approved drawings shall be provided and made available for use by

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

Reason:

To ensure that the refuse will be appropriately stored within the site thereby protecting the amenity of the site and the area in general from litter, odour and potential vermin/pest nuisance in accordance with: the National Planning Policy Framework 2021 and policies P56 ('Protection of amenity') and P62 ('Reducing waste') of the Southwark Plan 2022.

37 Drainage Verification Report

No dwelling shall be occupied until a drainage verification report prepared by a suitably qualified engineer has been submitted to and approved in writing by the Local Planning Authority. The report shall provide evidence that the drainage system (incorporating SuDS) has been constructed according to the approved details and specifications (or detail any minor variations where relevant) as detailed in the Sustainable Drainage Statement prepared by BWB (ref: JIR-BWB-ZZ-XX-RP-CD-0001_SDS-S2-P05, dated March 2022) and shall include plans, photographs and national grid references of key components of the drainage network such as surface water attenuation structures, flow control devices and outfalls. The report shall also include details of the responsible management company. Prior to occupancy, the applicant shall also provide a maintenance schedule in line with the approved drainage design that details the frequency and method of maintaining the drainage infrastructure so that its functionality in the future is maintained to the standard specified in the drainage strategy.

Reason:

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

Compliance condition(s) - the following condition(s) impose restrictions and/or other requirements that must be complied with at all times once the permission has been implemented.

38 Air Quality

The development shall achieve full compliance with the air quality assessment mitigation measures as detailed in Air Quality Assessment produced by BWB dated December 2021.

Reason:

To protect future occupiers from poor external air quality in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P65 (Improving air quality), and the National Planning Policy Framework 2021.

39 Enhanced Horizontal Sound Transmission

All party walls, floors and ceilings between the commercial premises and residential dwellings shall be designed to achieve a minimum weighted standardized level difference 55dB DnTw+Ctr. Pre-occupation testing of the separating partitions shall be undertaken for airborne sound

insulation in accordance with the methodology of ISO 16283-1:2014. Details of the specification of the partition together with full results of the sound transmission testing shall be submitted to the Local Planning Authority for written approval prior to the use commencing and once approved the partition shall be permanently maintained thereafter.

Reason:

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities within the adjacent premises in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2021.

40 Plant Noise

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

Suitable acoustic treatments shall be used to ensure compliance with the above standard. A validation test shall be carried out and the results submitted to the Local Planning Authority for approval in writing to demonstrate compliance with the above standard. Once approved the plant and any acoustic treatments shall be permanently maintained thereafter.

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2021.

41 External noise levels in amenity areas

Communal and Private external amenity and play areas shall be designed to attain 55dB(A) LAeq, 16hr †, as far as is reasonably practicable.

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

Reason:

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess noise sources in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity), and the National Planning Policy Framework 2021.

42 Servicing Hours

Any deliveries or collections to the development shall only be between the following hours:

06:00 - 22:00 Monday to Saturday; and

10:00 - 18:00 on Sundays and Bank Holidays.

Reason:

To ensure that the occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance, and to reduce vehicle movements on the local road network during peak times, in accordance with: the National Planning Policy Framework 2021; Policy T7 ('Deliveries, Servicing and Construction') of the London Plan 2021 and policy P50 ('Highways Impacts') of the Southwark Plan 2022.

43 Hours of Use

The use hereby permitted for use-class E shall not be carried on outside of the hours 07:00 to 23:00 on any day.

The use hereby permitted for a Builders' Merchants shall not be carried on outside the hours of 06:00 to 22:00 on Mondays to Saturdays and 10:00 to 18:00 on Sundays and Bank Holidays

Reason:

To safeguard the amenity of neighbouring residential properties in accordance with The National Planning Policy Framework 2021 and Southwark Plan 2022 policy P56 ('Protection of amenity').

44 External Lighting

Any external lighting system installed at the development shall comply with Institute of Lighting Professionals Guidance Note 01/20 'Guidance notes for the reduction of obtrusive light'.

Reason:

In order that the Council may be satisfied as to the details of the development in the interest of the visual amenity of the area, the amenity and privacy of adjoining occupiers, and their protection from light nuisance, in accordance with The National Planning Policy Framework 2021, London Plan policy G6 ('Biodiversity and access to nature') and Southwark Plan 2022 policies P56 ('Protection of amenity') and P60 ('Biodiversity').

45 Fire Safety Strategy

The development hereby consented shall not be carried out other than in accordance with the approved Planning Fire Strategy Report (prepared by Jensen Hughes ref. EL6932/R1 Issue 2) dated 15/12/21.

Reason:

To minimise the risk to life and minimise building damage in the event of a fire, in accordance with: the National Planning Policy Framework 2021, and; Policy D12 ('Fire safety') of the London Plan 2021.

46 **Energy Efficiency**

The development hereby permitted shall be constructed in accordance with the approved Energy and Sustainability Statement (prepared by CDI ref. P05) dated 04.08.22. All measures and technologies shall remain for as long as the development is occupied, unless as otherwise agreed in writing.

Reason:

To ensure the development complies with the National Planning Policy Framework 2021 and Policy S1 2 of the London Plan 2021.

47 **Roof Plant and Other Roof Structures**

No roof plant, equipment or other structures, other than as shown on the drawings hereby approved or discharged under an 'approval of details' application pursuant to this Decision Notice, shall be placed on the roof or be permitted to project above the roofline of any part of the building as shown on elevational drawings or shall be permitted to extend outside of the roof plant enclosures of any building hereby permitted.

Reason:

In order to ensure that no additional plant is placed on the roof of the building in the interest of the appearance and design of the building and the visual amenity of the area, in accordance with: the National Planning Policy Framework 2021, Southwark Plan 2022 policies P13 ('Design of places') and P14 ('Design quality') of the Southwark Plan 2022 and policy D4 ('Delivering good design') of the London Plan 2021.

48 **Restriction of Roofs For Use For Maintenance, Repair or Means of Escape Only**

With the exception of the designated rooftop external amenity spaces and terraces depicted on the approved drawings, all areas of roof within the development hereby consented shall be used only for the purposes of maintenance, repair or means of escape, and shall not be as outdoor amenity space by the occupiers or users of the premises.

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of overlooking and noise nuisance in accordance with: the National Planning Policy Framework 2021, policy P56 ('Protection of amenity') of the Southwark Plan 2022 and policy D4 ('Delivering good design') of the London Plan 2021.

49 **Restriction of Instatement of Appurtenances**

With the exception of rainwater pipes, no meter boxes, flues, vents or pipes other than as shown on the drawings hereby approved or discharged under an 'approval of details' application pursuant to this permission, shall be fixed or installed on the elevations of the building, unless otherwise approved by the LPA.

Reason:

To ensure such works do not detract from the appearance of the building in accordance with: The National Planning Policy Framework 2021, Southwark Plan 2022 policies P13 ('Design of places') and P14 ('Design quality') of the Southwark Plan 2022 and policy D4 ('Delivering good design') of the London Plan 2021.

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

50 Archaeological Reporting

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

Reason:

In order that the archaeological interest of the site is secured with regard to the details of the post-excavation works, publication and archiving to ensure the preservation of archaeological remains by record in accordance with Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2021.

51 BREEAM

(a) Before any fit out works to the non-residential units hereby authorised begins, an independently verified BREEAM Design Stage report (detailing performance in each category, overall score, BREEAM rating and a BREEAM certificate of building performance) to achieve a minimum 'excellent' rating (unless otherwise agreed by the local planning authority) shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any such approval given;

(b) Within 6 months of the first occupation of the non-residential building hereby permitted, a certified Post Construction Review (or other verification process agreed with the local planning authority) shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed standards at (a) have been met.

Reason:

To ensure the proposal complies with The National Planning Policy Framework 2021, Southwark Plan 2022 policy P69 ('Sustainability standards') and policy SI2 ('Minimising greenhouse gas emissions') of the London Plan 2021.

Informative notes to the applicant relating to the proposed development

THAMES WATER

1. There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.

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

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

ENVIRONMENT AGENCY

4. Contaminated soil that is (or must be) disposed of is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:

- Duty of Care Regulations 1991

- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. Refer to the hazardous waste pages on gov.uk for more information.

The CLAIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste or have ceased to be waste. Under the Code of Practice: excavated materials that are recovered via a treatment operation can be re-used on-site providing they are treated to a standard such that they fit for purpose and unlikely to cause pollution treated materials can be transferred between sites as part of a hub and cluster project formally agreed with the Environment Agency. Some naturally occurring clean material can be transferred directly between sites. Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

The Environment Agency recommends that developers should refer to: the Position statement on the Definition of Waste: Development Industry Code of Practice and; The Environmental regulations page on GOV.UK

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:

Chapter 2 Achieving sustainable development

Chapter 6 Building a strong, competitive economy

Chapter 7 Ensuring the vitality of town centres

Chapter 8 Promoting healthy and safe communities

Chapter 9 Promoting sustainable transport

Chapter 11 Making effective use of land

Chapter 12 Achieving well-designed places

Chapter 14 Meeting the challenge of climate change, flooding and coastal change

Chapter 16 Conserving and enhancing the historic environment

New London Plan 2021 Policies

On 2 March 2021, the Mayor of London published the London Plan 2021. The spatial development strategy sets a strategic framework for planning in Greater London and forms part of the statutory Development Plan for Greater London.

The relevant policies are:

GG1 Building strong and inclusive communities

GG2 Making the best use of land

GG3 Creating a healthy city

GG5 Growing a good economy

GG6 Increasing efficiency and resilience

Policy SD1 Opportunity Areas

Policy SD6 Town centres and high streets

Policy SD7 Town centres: development principles and Development Plan Documents

Policy SD8 Town centre network

Policy SD9 Town centres: Local partnerships and implementation

Policy SD10 Strategic and local regeneration

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

Policy D2 Infrastructure requirements for sustainable densities

Policy D3 Optimising site capacity through the design-led approach

Policy D4 Delivering good design

Policy D5 Inclusive design

Policy D7 Accessible housing

Policy D8 Public realm

Policy D9 Tall buildings

Policy D10 Basement development

Policy D11 Safety, security and resilience to emergency

Policy D12 Fire safety

Policy D14 Noise

Policy H1 Increasing housing supply

Policy H4 Delivering affordable housing

Policy H5 Threshold approach to applications

Policy H6 Affordable housing tenure

Policy H7 Monitoring of affordable housing

Policy H10 Housing size mix

Policy S1 Developing London's social infrastructure

Policy E2 Providing suitable business space

Policy E11 Skills and opportunities for all

Policy HC1 Heritage conservation and growth

Policy HC2 World Heritage Sites

Policy HC3 Strategic and Local Views

Policy HC4 London View Management Framework

Policy G1 Green infrastructure

Policy G5 Urban greening

Policy G6 Biodiversity and access to nature

Policy G7 Trees and woodlands

Policy SI 1 Improving air quality

Policy SI 2 Minimising greenhouse gas emissions

Policy SI 3 Energy infrastructure

Policy SI 4 Managing heat risk

Policy SI 5 Water infrastructure

Policy SI 6 Digital connectivity infrastructure

Policy SI 7 Reducing waste and supporting the circular economy

Policy SI 8 Waste capacity and net waste self-sufficiency

Policy SI 12 Flood risk management

Policy SI 13 Sustainable drainage

Policy T1 Strategic approach to transport

Policy T2 Healthy Streets

Policy T3 Transport capacity, connectivity and safeguarding

Policy T4 Assessing and mitigating transport impacts

Policy T5 Cycling

Policy T6 Car parking

Policy T6.2 Office parking

Policy T6.3 Retail parking

Policy T6.5 Non-residential disabled persons parking

Policy T7 Deliveries, servicing and construction

Policy T9 Funding transport infrastructure through planning

Southwark Plan 2022

ST1 Southwark's Development targets

ST2 Southwark's Places

SP1a Southwark's development targets

SP1b Southwark's places

SP1 Quality affordable homes

SP3 Great start in life

SP4 Green and inclusive economy

SP5 Thriving neighbourhoods and tackling health equalities

SP6 Climate Change

AV.13 Old Kent Road Area Vision

P1 Social rented and intermediate housing

P2 New family homes

P7 Wheelchair accessible and adaptable housing

P12 Design of places

P13 Design quality

P16 Designing out crime

P17 Tall buildings

P18 Efficient use of land

P20 Conservation areas

P21 Conservation of the historic environment and natural heritage

P22 Borough views

P23 Archaeology

P28 Access to employment and training

P29 Strategic protected industrial land

P30 Office and business development

P31 Affordable workspace

P32 Small shops

- P35 Town and local centres
- P44 Broadband and digital infrastructure
- P45 Healthy developments
- P47 Community uses
- P49 Public transport
- P50 Highways impacts
- P51 Walking
- P53 Cycling
- P54 Car Parking
- P55 Parking standards for disabled people and the mobility impaired
- P56 Protection of amenity
- P57 Open space
- P59 Green infrastructure
- P60 Biodiversity
- P61 Trees
- P62 Reducing waste
- P64 Contaminated land and hazardous substances
- P65 Improving air quality
- P66 Reducing noise pollution and enhancing soundscapes
- P67 Reducing water use
- P68 Reducing flood risk
- P69 Sustainability standards
- P70 Energy
- IP2 Transport infrastructure
- IP3 Community infrastructure levy and section 106 planning obligations.

Mayors SPD/SPGs

Sustainable Design and Construction (April 2014)

Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy (April 2013)

London View Management Framework (March 2012)

Planning for Equality and Diversity in London (October 2007)

The Mayor's Good Practice Guide to Estate Regeneration

Southwark SPDs/SPGs

Design and Access Statements (2007)

Residential Design Standards (2011 with 2015 update)

S106 and CIL (2015)

S106 and CIL Addendum (2017)

Sustainability Assessments (2007)

Sustainable Design and Construction (2009)

Sustainable Transport (2009)

Southwark AAP's

Draft Old Kent Road Area Action Plan (December 2020)

APPENDIX 3: RELEVANT PLANNING HISTORY

Relevant Site History

Planning application (21/AP/1146) for: Screening Opinion to determine whether an Environmental Impact Assessment is required for the demolition of existing building and redevelopment of a mixed use scheme comprising approximately 1,125 sqm (GIA) plus 1,065 sqm (GEA) external yard that retains the existing Jewsons Builders Merchant on site, and up to 202 residential units (Use Class C3) in two blocks of 9/13 and 27 storeys above ground

Relevant History of Adjoining Sites

The council has approved a number of planning applications recently in the Old Kent Road Opportunity Area including:

840 Old Kent Road, London SE15 1NQ

Planning application (19/AP/1322) granted for: Demolition of existing building and redevelopment of the site to provide a new building of up to 13 and 21 storeys in height (maximum height 73.60m above ground level). Redevelopment to comprise 170 residential units (Class C3), a 1,778 sqm (GIA) retail unit (Class A1) and a 52 sqm (GIA) flexible retail unit (Class A1/A3), with associated landscaping, car parking, servicing, refuse and plant areas, and all ancillary or associated works.

227-255 Ilderton Road, SE15, OLD KENT ROAD AND LAND AT LIVESEY PLACE, LONDON, SE15 1NS

Planning application (19/AP/1773) granted: Demolition of existing buildings and the erection of a part 2/3, 9 and 28 storey (up to 94.65m AOD) mixed-use development comprising of 3,581 sqm including 2,538 sqm of industrial floorspace (Use Classes B1c/B8) at ground and intermediate levels, 598 sqm of internal loading yard, 445 sqm ancillary plant and equipment; and 253 residential apartments (C3), 35.75% affordable by habitable room, and other associated infrastructure.

This application represents a departure from strategic policy 10 'Jobs and Businesses' of the Core Strategy (2011) and Saved Policy 1.2 'Strategic and Local Preferred Industrial Locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location.

Devonshire Grove 747-759 & 765-775 OLD KENT ROAD, LONDON SE15 1NZ & LAND AT DEVONSHIRE GROVE SE15

Full planning permission (19/AP/1239) for the demolition of all existing structures on site, the stopping up of the existing Devonshire Grove major arm (IWWMF egress road) and redevelopment to include formation of a new road reconfiguration and widening of Devonshire Grove, widening of the foot ways on Sylvan Grove and Old Kent Road, construction of Building A at ground plus 38 storeys to provide 264 residential units (Class C3), flexible retail/employment floorspace (Class A1/A2/A3/A4/B1a-c), creation of a new public realm including new public squares and spaces, associated landscaping and highways works and a new substation and all associated works. Outline planning permission (all matters reserved) for comprehensive mixed-use development for the following uses in four Buildings (B, C, D and E) and a basement level shared with Building A: Up to a maximum of 301 residential units (Class C3); employment workspace floorspace (Class B1a-c); flexible retail, financial and professional services, food and drink uses (Class A1/A2/A3/A4/A5), flexible non-residential institutions (Class D1) and Assembly and leisure uses (Class D2); Storage, car and cycle parking; Energy centre; Substations; Formation of new pedestrian and vehicular access and means of access and circulation within the site together; and new private and communal open space.

Daisy Business Park 19-35 Sylvan Grove London SE15

Planning permission (19/AP/2307) for demolition of existing buildings and redevelopment of the site to provide a mixed use development comprising of 219 residential dwellings (Use Class C3) and 3,088 sqm (GIA); commercial workspace (Use Class B1) within two buildings of 5 storeys (24.55m AOD) and 32 storeys (106.43m AOD); and associated car and cycle parking, landscaping, and public realm and highways improvements.

313-349 Ilderton Road London, SE15

Planning permission (20/AP/1329) for Demolition of existing buildings and construction of two buildings, one of part 11 and 13 storeys and one of part 13 and 15 storeys, to provide 1,739sq.m (GIA) of commercial floorspace, 250 student accommodation bed spaces (Sui Generis) and 58 residential units, with associated access and highway works, amenity space, cycle parking spaces, disabled car parking spaces and refuse/ recycling stores.

APPENDIX 4: CONSULTATION UNDERTAKEN

Site notice date: 23.03.2022

Press notice date: 27.01.3022

Case officer site visit date: 23.03.2022

Neighbour consultation letters sent: 21.01.2022

Internal services consulted

Ecology

Environmental Protection

Highways Development and Management

Flood Risk Management & Urban Drainage

Transport Policy

Urban Forester

Waste Management

Section 106 Team and CiL team

Tree Services

Public Health

Local Economy

Arboricultural Services

Statutory and non-statutory organisations

Environment Agency

Greater London Authority

Transport for London

Metropolitan Police Service (Designing Out Crime)

Thames Water

National Grid

London Fire & Emergency Planning Authority

Natural England

Historic England

Health and Safety Executive: Fire Risk Assessments

Arqiva

Bakerloo Line Safeguarding

Civil Aviation Authority

Vital Old Kent Road

Neighbour and local groups consulted

Name/Address	Period	Date Printed	Reply by
Flat 6 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
145 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
Unit 3 96 - 108 Ormside Street London Southwark SE	B28	21/01/2022	18/02/2022
182-196 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
8 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
Unit 29 The Penarth Centre Penarth Street London S	B28	21/01/2022	18/02/2022
Apartment 5 90 Varcoe Road London Southwark SE16 3	B28	21/01/2022	18/02/2022
Flat 4 Atar House 179 Ilderton Road London Southwa	B28	21/01/2022	18/02/2022
Unit 21A The Penarth Centre Penarth Street London	B28	21/01/2022	18/02/2022
Unit 12 The Penarth Centre Penarth Street London S	B28	21/01/2022	18/02/2022
14-38 Hatcham Road London Southwark SE15 1TW	B28	21/01/2022	18/02/2022
20 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
6 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
Flat 22 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
Flat 9 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
206-210 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022

Apartment 3 90 Varcoe Road London Southwark SE16 3	B28	21/01/2022	18/02/2022
Flat 8 Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Units 32 And 32A The Penarth Centre Penarth Street	B28	21/01/2022	18/02/2022
Units 16 And 17 The Penarth Centre Penarth Street	B28	21/01/2022	18/02/2022
Flat 20 Shirley Chisholm Court 62 Hatcham Road Lon	B28	21/01/2022	18/02/2022
Flat 12 Shirley Chisholm Court 62 Hatcham Road Lon	B28	21/01/2022	18/02/2022
Flat 5 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 4 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
132-136 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
First Floor 96-108 Ormside Street London Southwark	B28	21/01/2022	18/02/2022
Flat 3 Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Flat B 219 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
International Secretariat 215 Ilderton Road London	B28	21/01/2022	18/02/2022
Flat 7 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
Flat 2 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
90 Varcoe Road London Southwark SE16 3DG	B28	21/01/2022	18/02/2022
Flat 2 Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022

5 - 9 Record Street London Southwark SE15 1TL	B28	21/01/2022	18/02/2022
19 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
17 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
16 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
12 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
Studio 13 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Studio 10 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Studio 3 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Unit A Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Unit 28B The Penarth Centre Penarth Street London	B28	21/01/2022	18/02/2022
Flat A 219 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
Flat 1 211 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
236 Record Street London Southwark SE15 1TL	B28	21/01/2022	18/02/2022
Units 18 And 33 The Penarth Centre Penarth Street	B28	21/01/2022	18/02/2022
Flat 24 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 18 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022

Flat 9 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 8 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 7 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
10 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
Unit 1 62 Hatcham Road London Southwark SE15 1TW	B28	21/01/2022	18/02/2022
Flat 13 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
21 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
11 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
147 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
Studio 11 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Unit 20 Right The Penarth Centre Penarth Street Lo	B28	21/01/2022	18/02/2022
Flat 1 213 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
Flat A 209 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
7 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
Flat 19 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
Flat 12 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
180 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022

127-135 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
137 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
Apartment 1 90 Varcoe Road London Southwark SE16 3	B28	21/01/2022	18/02/2022
Flat 1 Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Unit 21B The Penarth Centre Penarth Street London	B28	21/01/2022	18/02/2022
Flat 2 221 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
21 Hatcham Road London Southwark SE15 1TW	B28	21/01/2022	18/02/2022
Unit 7 The Penarth Centre Penarth Street London Southwark	B28	21/01/2022	18/02/2022
Flat 23 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 22 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 17 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 14 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 10 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 3 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 2 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
179A Ilderton Road London Southwark SE16 3LA	B28	21/01/2022	18/02/2022

Flat 10 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
223-225 Ilderton Road London SE15 1NS	B28	21/01/2022	18/02/2022
Asaholah Salvation Church Of God Ormside Stre	B28	21/01/2022	18/02/2022
18 Gerards Close London 3DF	B28	21/01/2022	18/02/2022
Ilderton Primary School Ilderton Road Southwark	B28	21/01/2022	18/02/2022
Units 5 And 6 The Penarth Centre Street Lo	B28	21/01/2022	18/02/2022
Unit 28A The Penarth Centre London	B28	21/01/2022	18/02/2022
Ground Floor 180 Ilderton Road Southwark SE	B28	21/01/2022	18/02/2022
First Floor 145 Ormside Street Southwark SE	B28	21/01/2022	18/02/2022
Unit 4 62 Hatcham Road London SE15 1TW	B28	21/01/2022	18/02/2022
22 Gerards Close London 3DF	B28	21/01/2022	18/02/2022
Flat 1 Warlingham House Varcoe Road Southwark	B28	21/01/2022	18/02/2022
110-116 Ormside Street London SE15 1TF	B28	21/01/2022	18/02/2022
Studio 12 40-50 Hatcham Road Southwark SE15	B28	21/01/2022	18/02/2022
Studio 7 40-50 Hatcham Road Southwark SE15	B28	21/01/2022	18/02/2022
Flat A 217 Ilderton Road London SE15 1NS	B28	21/01/2022	18/02/2022

Unit 19 The Penarth Centre Penarth Street London S	B28	21/01/2022	18/02/2022
Unit 1 And 2 96-108 Ormside Street London Southwark	B28	21/01/2022	18/02/2022
Flat A 154 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
Unit 30 The Penarth Centre Penarth Street London	B28	21/01/2022	18/02/2022
Flat 2 211 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
235 Record Street London Southwark SE15 1TL	B28	21/01/2022	18/02/2022
Unit 32A The Penarth Centre Penarth Street London	B28	21/01/2022	18/02/2022
Flat 27 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 26 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 19 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 15 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 3 211 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
Flat 2 213 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
Studio 5 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Flat B 152 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
Unit 11 The Penarth Centre Penarth Street London S	B28	21/01/2022	18/02/2022

23 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
9 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
107-113 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
Studio 6 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Apartment 4 90 Varcoe Road London Southwark SE16 3	B28	21/01/2022	18/02/2022
Units 1 And 2 237 Record Street London Southwark S	B28	21/01/2022	18/02/2022
Units 32B And C The Penarth Centre Penarth Street	B28	21/01/2022	18/02/2022
Flat 29 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 28 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 13 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Second Floor Flat 209 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Studio 1 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Flat 7 Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Unit 22 The Penarth Centre Penarth Street London S	B28	21/01/2022	18/02/2022
140 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
18-22 Penarth Street London Southwark SE15 1TX	B28	21/01/2022	18/02/2022
Flat 23 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022

Flat 10 Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Studio 8 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
25 Hatcham Road London Southwark SE15 1TW	B28	21/01/2022	18/02/2022
Penarth Works Penarth Street London Southwark SE15	B28	21/01/2022	18/02/2022
Unit 8 The Penarth Centre Penarth Street London So	B28	21/01/2022	18/02/2022
Flat 14 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
Flat 11 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
Flat 8 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
River Of Life Pentecostal Church 12-38 Hatcham Road	B28	21/01/2022	18/02/2022
202 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
221 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
139 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
Studio 4 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Flat 5 Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Unit 20 Left The Penarth Centre Penarth Street London	B28	21/01/2022	18/02/2022
Flat B 154 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022

Ground Floor Southwark S	145 Ormside Street London	B28	21/01/2022	18/02/2022
Unit 1 SE15 1NT	140 Ilderton Road London	B28	21/01/2022	18/02/2022
Unit 14 And 15 Street L	The Penarth Centre Penarth	B28	21/01/2022	18/02/2022
Unit 25 Southwark	107 - 113 Ormside Street London	B28	21/01/2022	18/02/2022
Flat 21 Road London	Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 16 Road London	Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 1 London	Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 11 Southw	Atar House 179 Ilderton Road London	B28	21/01/2022	18/02/2022
Flat 5 Southwark	Warlingham House Varcoe Road London	B28	21/01/2022	18/02/2022
Flat 15 London Southwark	Warlingham House Varcoe Road London	B28	21/01/2022	18/02/2022
Flat 20 London Southwark	Warlingham House Varcoe Road London	B28	21/01/2022	18/02/2022
Flat 18 London Southwark	Warlingham House Varcoe Road London	B28	21/01/2022	18/02/2022
Unit 24 London S	The Penarth Centre Penarth Street London	B28	21/01/2022	18/02/2022
Unit 13 London S	The Penarth Centre Penarth Street London	B28	21/01/2022	18/02/2022
Apartment 2 Southwark SE16 3	90 Varcoe Road London	B28	21/01/2022	18/02/2022
Studio 2 Southwark SE15	40-50 Hatcham Road London	B28	21/01/2022	18/02/2022

143 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
Unit 31 The Penarth Centre Penarth Street London S	B28	21/01/2022	18/02/2022
Unit 25 And 26 The Penarth Centre Penarth Street L	B28	21/01/2022	18/02/2022
Unit 3 The Penarth Centre Penarth Street London So	B28	21/01/2022	18/02/2022
113 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
Flat 1 221 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
13 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
Flat 17 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
Flat 16 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
24 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
148-150 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
217 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
115-125 Ormside Street London Southwark SE15 1TB	B28	21/01/2022	18/02/2022
Studio 9 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Flat 6 Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Flat A 152 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022

Part First Floor Front 180 Ilderton Road London So	B28	21/01/2022	18/02/2022
141 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
Unit 2 140 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
Flat 25 Shirley Chisholm Court 62 Hatcham Road Lon	B28	21/01/2022	18/02/2022
Flat 11 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 6 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 4 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 12 Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Flat 24 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
15 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
14 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
Unit 34 The Penarth Centre Penarth Street London S	B28	21/01/2022	18/02/2022
Unit 2 62 Hatcham Road London Southwark SE15 1TW	B28	21/01/2022	18/02/2022
Unit 23 The Penarth Centre Penarth Street London S	B28	21/01/2022	18/02/2022
First Floor Flat 209 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Unit 3 62 Hatcham Road London Southwark SE15 1TW	B28	21/01/2022	18/02/2022

118-120 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
Flat 21 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
Flat 3 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
Apartment 6 90 Varcoe Road London Southwark SE16 3	B28	21/01/2022	18/02/2022
Flat 9 Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
First Floor Rear 180 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Corner Of Sharratt Street 257-283 Ilderton Road London	B28	21/01/2022	18/02/2022
Unit 1 2 And 4 The Penarth Centre Penarth Street London	B28	21/01/2022	18/02/2022

APPENDIX 5: CONSULTATION RESPONSES RECEIVED

Statutory and non-statutory organisations

Environment Agency
Greater London Authority
Transport for London
Metropolitan Police Service (Designing Out Crime)
London Fire & Emergency Planning Authority
London Underground
Network Rail
Natural England
Historic England
Health and Safety Executive: Fire Risk Assessments
Bakerloo Line Safeguarding

Neighbour and local groups

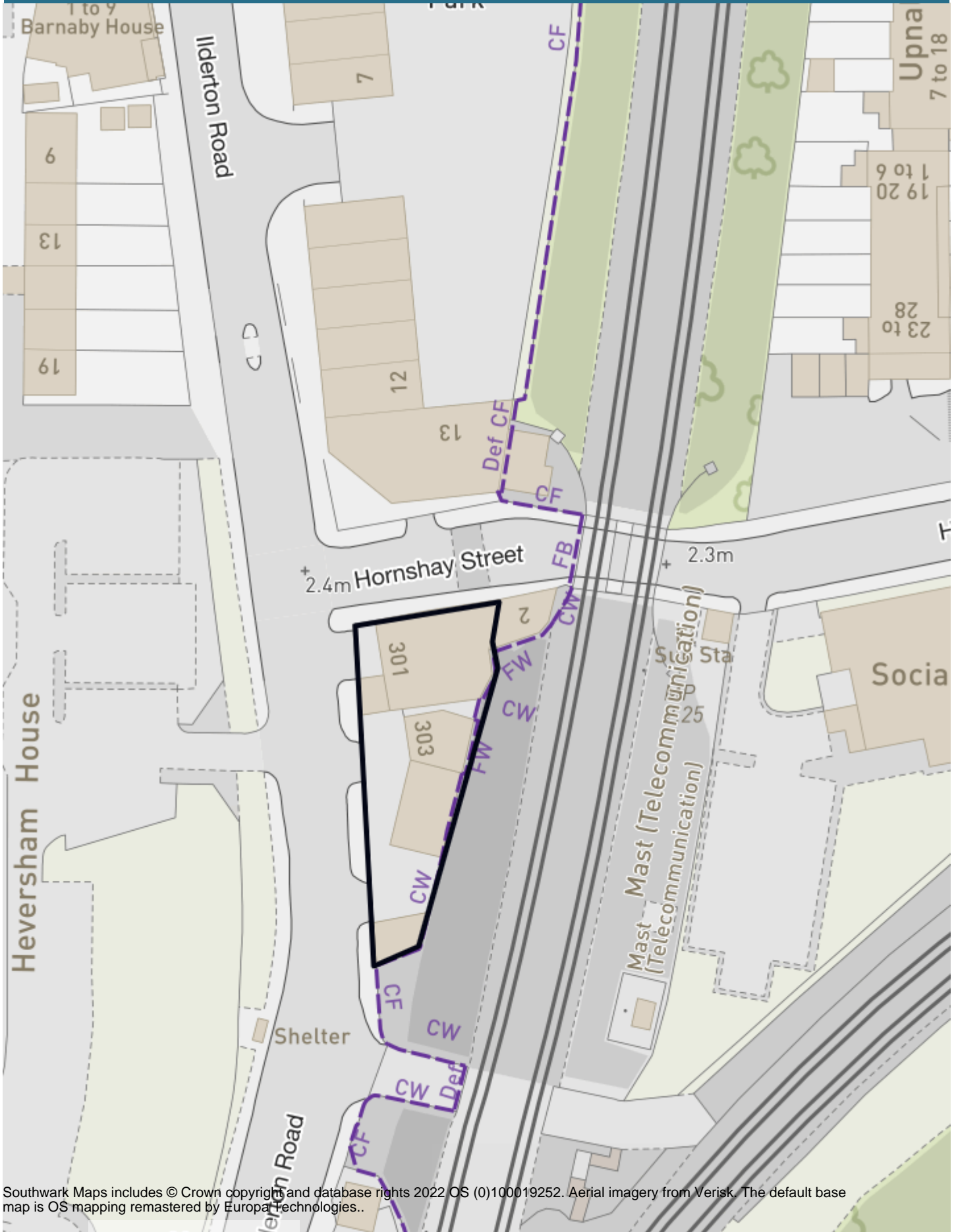
Unit 5/6 The Penarth Centre, Penarth Street London SE15 1TR

Agenda Item 6.2



20/AP/3560

301-303 Ilderton Road, London SE15 1NW



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Contents

RECOMMENDATION	4
EXECUTIVE SUMMARY	4
BACKGROUND INFORMATION.....	7
Site location and description	7
Details of Proposal.....	9
Consultation responses from members of the public	10
KEY ISSUES FOR CONSIDERATION.....	10
Summary of main issues.....	10
Legal Context.....	11
EQUALITIES	11
Environmental Impact Assessment.....	12
PRINCIPLE OF DEVELOPMENT IN TERMS OF LAND USE	12
Opportunity Area.....	13
Prematurity.....	15
AFFORDABLE HOUSING AND DEVELOPMENT VIABILITY	16
Affordable Housing	16
Development Viability	17
DESIGN CONSIDERATIONS	18
Site Layout.....	18
Height Scale and Massing (including consideration of Tall Buildings)	18
Architectural Design and Materiality.....	20
Conclusion on Design Issues.....	23
Public realm	23
Landscaping and Urban Greening Factor	24
Ecology	25
HOUSING MIX, DENSITY AND RESIDENTIAL QUALITY	25
Housing Mix	25
Wheelchair Housing.....	26
Density.....	27
Quality of Residential Accommodation	27
IMPACT OF PROPOSED DEVELOPMENT ON AMENITY OF ADJOINING OCCUPIERS AND SURROUNDNG AREA.....	32

Impact of the Proposed Uses.....	32
Daylight and Sunlight Impacts.....	32
Overlooking of Neighbouring Properties	36
Outlook	36
TRANSPORT CONSIDERATIONS	36
Servicing	38
ARCHAEOLOGY.....	41
ENVIRONMENTAL CONSIDERATIONS	41
Wind and Microclimate.....	42
Fire strategy	42
Flood Risk and Water Resources	42
Ground Conditions and Contamination	43
Air Quality	43
Noise and Vibration.....	44
SUSTAINABLE DEVELOPMENT IMPLICATIONS	44
Energy	44
Overheating	46
Whole life cycle and carbon capture	46
Circular economy statement	47
BREEAM.....	47
Digital connectivity infrastructure	47
PLANNING OBLIGATIONS (Section 106 Undertaking or Agreement).....	48
Mayoral and Soutwark Community Infrastructure Levy (CIL).....	52
OTHER MATTERS.....	52
COMMUNITY INVOLVEMENT AND ENGAGEMENT.....	53
Human rights implications	53
CONCLUSION ON PLANNING ISSUES.....	53
Consultation responses from external and statutory consultees	54
BACKGROUND INFORMATION.....	60
BACKGROUND DOCUMENTS	60
APPENDICES	60
AUDIT TRAIL	61
APPENDIX 1 – RECOMMENDATION	62

APPENDIX 2 – PLANNING POLICY	81
APPENDIX 3 – RELEVANT PLANNING HISTORY	87
APPENDIX 4 – CONSULTATION UNDERTAKEN	89
APPENDIX 5 – CONSULTATION RESPONSES RECEIVED.....	112

Item No. 6.2	Classification: OPEN	Date: 18 October 2022	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 20/AP/3560 for: FULL PLANNING APPLICATION Address: 301-303 ILDERTON ROAD, LONDON, Proposal: demolition of existing buildings and construction of a 15 storey building comprising 59 residential dwellings (Class C3) and commercial floorspace (Class E(g), with landscaping (including a communal roof garden and ground floor playspace), cycle parking and associated ancillary development.		
Ward(s) or groups affected:	Old Kent Road		
From:	Director of Planning and Growth		
Application Start Date	17/02/2021	Application Expiry Date	19/05/2021
Earliest Decision Date	13/10/2021	Extension of time	28/02/2023

RECOMMENDATION

1. a) That planning permission is GRANTED subject to conditions, referral to the Mayor of London and the completion of a s106 legal agreement.
2. b) In the event that the requirements of (a) are not met by 28th February 2023 that the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 243 of this report.

EXECUTIVE SUMMARY

3. The proposals involve the demolition of the existing car repairs and hand car wash site on the eastern side of Ilderton Road to provide a mixed-use commercial and residential development of 59 units and 450sqm of Class E (g)(iii) commercial floorspace.
4. The applicant has committed to providing almost 35.5% affordable housing by habitable rooms which equate to 16 affordable units, with a policy compliant tenure mix. There would be the potential for an uplift in jobs on the site through the re-provision of good quality commercial space, which would be more compatible with the neighbouring uses.
5. The quality of the proposed residential accommodation is considered to be very good, meeting or exceeding the minimum space standards and providing 66% dual aspect accommodation. It would have appropriate mitigation measures to ensure noise levels

internally are met as well as ensuring noise complaints against future commercial occupiers are minimised. The proposal includes 3 bedroom family homes at 20%.

6. The provision of policy compliant private amenity and play space is considered a good aspect of the development and compliant with policy requirements. There is only a very marginal shortfall of communal amenity space.
7. The building design and height have been amended and a height of 15 storeys is now proposed and would be of a high quality design and deliver the master-planning aspirations of the draft Old Kent Road Area Action Plan. The ground floor provides an active frontage and the pedestrian environment would be improved. The proposal would sit comfortably in the existing and emerging context in massing and design terms, including in the context of the adjoining consented schemes in the Old Kent Road Opportunity Area. It would have acceptable amenity impacts in terms of daylight and sunlight impacts for neighbours and would not cause any harmful overlooking of adjoining occupiers.
8. The proposal would be car free and future occupiers would be prevented from obtaining parking permits on the surrounding streets. A s106 contribution would be required to improve local bus infrastructure. The proposals would provide policy compliant cycle parking storage.
9. The proposal would incorporate measures to reduce its carbon dioxide emissions and achieve 64% savings, through connection to the district heating network and photovoltaic panels. A contribution to the Council's Carbon Off-set Green Fund would be secured through a s106 agreement. Conditions are recommended to ensure that ground contamination, surface water drainage, archaeology and ecology would be adequately dealt with.
10. Overall, the clear benefits of the proposal are considered to outweigh the limited harm caused, and it is recommended that planning permission be granted, subject to conditions, a s106 agreement and referral to the GLA.

Planning summary tables

11. Residential:

Tenure	Studio	1-bed	2-bed	3-bed	Total homes	Hab rooms
Proposed social rent	0	5	1	6	12	48
Proposed Intermediate	0	1	1	2	4	16
Market sale	7	16	16	4	43	109
Total	7	22	18	12	59	180

Percentage	11.9%	37.3%	30.5%	20.3%
Affordable housing (by hab room) 35.5%				

12. Non-residential:

Use Class	Existing sqm	Proposed sqm	Change +/- sqm
B2 General Industrial	168	0	-168
Sui Generis	57	0	-57
Commercial Class E	0	450	+450

13. Open space and playspace:

	Existing sqm	Proposed sqm	Change +/- sqm
Public open space	0	0	0
Children's playspace	0	243	243
Communal amenity space	0	115	115

14. Environmental:

Residential CO2 savings beyond Part L Bldg. Regs.	64%
Non-residential savings beyond Part L Bldg. Regs.	44%

15.

	Existing	Proposed	Change +/-
Urban Greening Factor Score	0	0.27	+0.27
Surface Water Run Off Rate	9.5l/s (1 in 100 year)	2 l/s	-7.5 l/s
Green/Brown Roofs	0	104sqm	+104sqm

Residential and commercial Cycle Parking Spaces	0	110 long-stay 8 short-stay	+ 110 long-stay + 8 short-stay
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16. CIL and S106 contributions:

SCIL (estimated)	£1,136,289.92
MCIL (estimated)	£301,988.62
S106	£1.5m

BACKGROUND INFORMATION

Site location and description

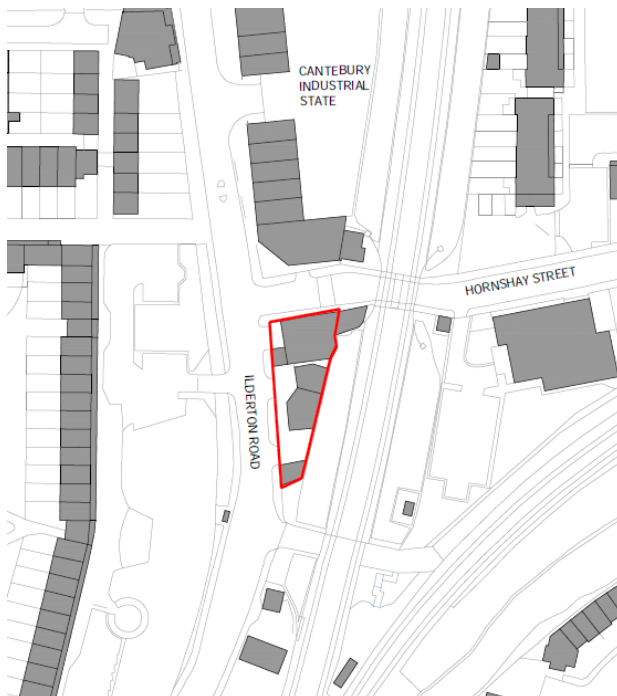
17. The application site comprises an area of 0.057 hectares (ha) and is triangular in its form, owing to its containment by Ilderton Road to the west, Hornshay Street to the north and the raised embankment of the South London Railway line to the east. To the rear of the site and railway line is the boundary of Lewisham Borough Council.
18. The site had previously accommodated two uses; a car repair use (B2 class use) within a single storey brick building with hipped roof and a car wash (Sui Generis use class) took place within an open yard and associated temporary structures.
19. The surrounding area is a mix of residential estates to the west and east and industrial/quasi retail uses extending along the route of Ilderton Road to the north and south. Canterbury Industrial Estate is located to the north of the site on the opposite side of Hornshay Street and contains a number of light industrial units. Immediately adjoining the site to the east is vehicle repair use at No. 2 Hornshay Street. Set back from Ilderton Road to the west is the post-war Tustin Estate, which rises up to six residential storeys. The taller towers of the Tustin Estate are further to the south east. Beyond the railway embankment to the east (on the opposite side of the railway line) is the Wheelshunters Social Club, which is part single and part two storeys in height with residential uses extending beyond falling within the borough of Lewisham.
20. The site is within the following Southwark planning policy designations:
- Locally Significant Industrial Site
 - Air Quality Management Area (AQMA)
 - North Southwark and Roman Roads Archaeological Priority Area
 - Old Kent Road Action Area Core
 - Hot food takeaway primary school exclusion zone
 - Critical Drainage Area
21. The site is also within the Old Kent Road Opportunity Area: Sub Area 4 – Hatcham,

Ilderton & Old Kent Road (specifically OKR16). The site also falls within a Site Allocation (NSP70) outlined in the New Southwark Plan.

22. The site falls within the extended background of Protected Vista 2A.1, which protects views from Parliament Hill Summit to St Paul's Cathedral. The site is not within a conservation and buildings are not listed. There are no nearby heritage assets in its setting. The site has a Public Transport Accessibility Level (PTAL) rating of 4, which is moderate access to public transport. The site is within the Flood Zone 3.
23. **Figure 1: View of the site.**



Image: Site Plan



Details of Proposal

24. This full planning application is for the demolition of the existing buildings for the construction of a 15 storey building to provide 59 residential units and commercial (light industrial) floor space (E class use) on the ground and first floor levels. The scheme that was originally submitted was for 54 units at 12 storeys. The applicant had to amend the scheme by increasing the number of units sharing a core to be able to secure a Registered Provider (RP) to take on the affordable units. It should be noted that planning permission was granted in May 2020 for a 12 storey building (plus basement) comprising 46 residential dwellings and commercial floorspace (ref 18/AP/2761), which has not yet been implemented.
25. Following that consent in May 2020, the applicant had made non-material minor amendments, which removed the basement level and made design changes and was approved (ref 20/AP/1489, dated 26th August 2020).
26. The ground and first floor levels of the development would comprise 450sqm of light industrial use. 10% of that would be affordable workspace and this is located in the northern part of the building and would have its own access from Ilderton Road.
27. The residential element of the scheme are located on the upper levels. The proposed mix of dwellings are:

	Number of units	Percentage (%)
Studios	7	11.9
1 bedroom unit	22	37.3
2 bedroom unit	18	30.5
3 bedroom unit	12	20.3
Total	59	100

28. The total maximum height of the building would be 56.5m AOD to the lift overrun (54.03m from finished ground floor level). This is an increase in height from the original submission and this is due to the difficulty in securing an RP for the affordable units. Having tried to find an RP for over 12 months since the grant of extant planning permission 18/AP/2761, the applicant finally found an RP, but the offer is subject to certain criteria, which requires some amendments to the originally submitted scheme. The key requirements from the RP is that the development provides a second core/third lift and separate access for service and management and entire floors of affordable (i.e. no split mixes of social and intermediate, or intermediate and private) again for management reasons. This has meant the number of floors had to be increased to accommodate this and would provide 16 affordable units.
29. Following various discussions with the applicant on other matters, the proposed ground floor layout would now provide one single residential entrance with two lifts for the residential units and access will be controlled by a fob. There would be separate bin stores and cycle stores for the different tenures.

30. Private amenity space would be proposed in the form of balconies and a communal garden and play space on the roof level.
31. A total of 118 cycle parking spaces would be provided and consists of various types of parking choices. In addition, visitor cycle spaces will be incorporated into the scheme.
32. The scheme will deliver 16 units as affordable housing to meet local housing needs, which represents 35.5% of all habitable rooms and 27% of all residential units as affordable. 12 of the units would be for social rent and 4 for intermediate.
33. Access to the commercial and residential uses would be from Ilderton Road, each with individual entrances. Servicing of the residential element of the development will be provided from Ilderton Road. Deliveries generated by the ground floor commercial uses will be accommodated within the rear service yard provided at ground floor level, accessible from Hornshay Street. This facility could accommodate scheduled delivery vehicle arrivals, such as planned courier trips generated by the ground floor commercial uses.

Revisions and Amendments

34. The scheme design has been amended since it was originally submitted following both consultee comments and Officers' review and re-consultation of the scheme was required and was carried out in September 2021.

Consultation responses from members of the public

35. No public consultation response has been received.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

36. The main issues to be considered in respect of this application are:
 - Equalities Impact Assessment
 - Environmental Impact Assessment
 - Principle of the proposed development in terms of land use;
 - Provision of housing;
 - Old Kent Road Phasing;
 - Affordable housing;
 - Development viability;
 - Design issues including site layout, tall buildings and heritage considerations;
 - Landscaping, trees, biodiversity, and urban greening;
 - Housing mix;
 - Density;
 - Quality of residential accommodation;
 - Designing out crime;

- Private, communal amenity space, children’s playspace & public open space;
- Impact of proposed development on amenity of adjoining neighbours and surrounding area;
- Transport;
- Archaeology;
- Refuse and waste;
- Wind and microclimate;
- Fire strategy;
- Flood risk and water resources;
- Ground contamination;
- Air quality and noise;
- Energy, sustainability and digital connectivity;
- Whole Life-Cycle and Circular Economy;
- Health Impact Assessment;
- Planning obligations; and
- Mayoral and borough community infrastructure levy

Legal Context

37. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2021, the Southwark Plan 2022 and the draft Old Kent Road Area Action Plan 2020.
38. There are also specific statutory duties in respect of the Public Sector Equalities Duty, which are highlighted in the relevant sections in the overall assessment at the end of the report.

EQUALITIES

39. The Equality Act (2010) provides protection from discrimination for the following protected characteristics: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership. Section 149 of the Equality Act 2010 places the Local Planning Authority under a legal duty to have due regard to the advancement of equality in the exercise of its powers, including planning powers. Officers have taken this into account in the assessment of this application and Members must be mindful of this duty, inter alia, when determining all planning applications. In particular Members must pay due regard to the need to:
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act; and
 - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
 - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
40. As set out in the Essential Guide to the Public Sector Equality Duty (2014), “the duty is on the decision maker personally in terms of what he or she knew and took into account.

A decision maker cannot be assumed to know what was in the minds of his or her officials giving advice on the decision". A public authority must have sufficient evidence in which to base consideration of the impact of a decision.

41. The Strategic Housing Market Assessment (SHMA) prepared on behalf of a number of South East London boroughs states that Southwark, together with Lewisham, has the most ethnically mixed population in the South East London sub-region. Compared to the population at large a very high proportion of Black households (70%) are housed in the social/affordable rented sector. These groups could therefore stand to benefit from the proposed affordable housing, which would include social rented units. The provision of communal amenity spaces to be shared by different tenures would also contribute to the potential for increased social cohesion.
42. There are a large number of existing black and ethnic minority businesses in the local area, which would not be directly affected by the proposed development. However, the impact of the development would increase footfall in the local area and could create a number of opportunities for these existing businesses.
43. These modern design standards offer significant improvements in accessibility, and would benefit potential future residents or visitors with disabilities, older people with mobility difficulties, and other groups such as parents with children. The development therefore would not raise any issues relating to disability equalities.
44. Overall, it is felt that the proposed development would make a contribution towards the regeneration of the surrounding area, the provision of new high quality accessible housing, including affordable housing and the creation of employment would have a positive impact on the local area. It is therefore considered that the proposed development would not have a negative impact on equalities.

Conclusion on Equality Impacts

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

Environmental Impact Assessment

46. The applicant did not make a screening request to determine whether an Environmental Impact Assessment (EIA) is required in respect of the proposed development due to the size and scale of the proposed scheme. The proposed development would not constitute EIA development and accordingly does not need to be supported by an Environmental Statement.

PRINCIPLE OF DEVELOPMENT IN TERMS OF LAND USE

Opportunity Area

47. The Old Kent Road Area Vision of the Southwark Plan 2022 sets out the overall vision for the Old Kent Road. The policy says development should:
- Deliver direct benefits to the existing community including new and improved homes including new council homes, schools, parks, leisure and health centres, and the creation of jobs;
 - Promote car free development and support the Bakerloo Line extension, electric buses, taxis, commercial vehicles and cycling which will help to tackle air and noise pollution;
 - Help foster a community in which old and young can flourish;
 - Build new homes that come in a range of types from terraced houses to apartments with a high design quality including generous room sizes, high ceilings and big windows to ensure people have space to think and to rest;
 - Link existing open spaces like Burgess Park to each other and new park spaces;
 - Demonstrate excellent standards of environmental sustainability including pioneering new district heating networks to reduce carbon emissions, measures to tackle poor air quality and sustainable urban drainage systems to reduce flood risk.
48. The Old Kent Road Area Vision also states that the Old Kent Road Area Action Plan (OKR AAP) will set out the physical framework that will enable the community to realise its potential. The Council is in the process of preparing this AAP for Old Kent Road, which proposes significant transformation of the Old Kent Road area over the next 20 years, including the extension of the Bakerloo Line with new stations along the Old Kent Road towards New Cross and Lewisham. A further preferred option of the Old Kent Road AAP (Regulation 18) was published in December 2020. As the document is still in draft form, it can only be attributed limited weight.
49. Following the adoption of the New Southwark plan (NSP) in February 2022, the site is no longer within Strategic Protected Industrial Location-Strategic (SPIL) and nor is it within the London Plan's Strategic Industrial Location (SIL). It is however, designated as a Locally Significant Industrial Site (LSIS).
50. The sub-text to NSP Policy P29 notes that many of the Old Kent Road site allocations designated for mixed use development as well as the sites designated as LSIS will be intensified for residential and industrial co-location. The emerging OKR AAP sets targets of a total of 20,000 new homes and 10,000 new jobs as well as new infrastructure, including parks and schools. As stated above, the OKR AAP places the site within the proposed Action Area Core, and within proposal site OKR 16 which covers the Hatcham Road and Ilderton Road area. The proposed development on this site for mixed residential/commercial would be in line with the aspirations of the AAP.

Employment and Affordable Workspace

51. Emerging policy AAP5 of the OKR AAP states that development must retain or increase the amount of employment floorspace on site (Use Class E(g)) and co-locate industrial

workspace with new homes and other uses in LSIS. It also requires the workspace to be managed by a specialist provider and for an element of affordable workspace to be provided in developments providing over 500sqm GIA of employment floorspace.

52. The Greater London Authority's (GLA) Stage 1 report was provided prior to the adoption of the NSP. In that report however, GLA officers accept that the application site is potentially suitable for a mixed-use redevelopment given the direction of travel of the New Southwark Plan and AAP and co-ordinated approach to the redevelopment of the of the wider area.
53. The site area is 0.057 hectares and currently accommodates 225sqm of existing industrial floorspace capacity. Both the car repair and car wash business had ceased and no longer occupy the site. The scheme proposes 450sqm of light industrial and this would mean that there is no net loss of employment floorspace. The space will be conditioned to be used for light industrial use (Class E (G)(iii) use only and will require a fit out of the space to include heating, cooling, lighting, toilet and kitchen facilities to have been agreed and completed before the residential can be occupied.. Policy P31 of the Southwark Plan requires developments proposing 500sqm GIA or more employment floorspace to provide 10% of the proposed gross employment floorspace as affordable workspace on site at discount market rents. Whilst the scheme does not provide more than the 500sqm threshold, the applicant has honoured the extant permission 18/AP/2761 where affordable workspace was provided and this is welcomed. 91sqm of affordable workspace is proposed in the northern part of the building having its own entrance. Triggers and controls regarding the affordable workspace are to be agreed in the S106 Unilateral Undertaking.

Provision of housing

54. The scheme would provide 59 new homes including a policy compliant affordable housing at 35.5% affordable (16 homes). There is a pressing need for housing in the borough, and this contribution of housing would assist in being able to provide new quality homes to serve the needs of residents within the borough. This provision of housing would significantly assist the Council's aim to provide 11,000 new council homes as detailed in the Southwark Plan.
55. London Plan Policy H1 (Increasing Housing Supply) highlights the need for new homes in London and sets out 10-year housing targets for each borough which are to be achieved by allocating a range of sites for housing; encouraging development on appropriate windfall sites; and optimising the potential for housing delivery on all suitable and available brownfield land. Table 4.1 of the London Plan sets Southwark a 10-year target (2018/29/ to 2028/29) for net housing completions of 23,550 (equivalent of 2,355 dwellings a year).
56. This is re-iterated in the Southwark Plan and draft OKR AAP. Specifically Policy ST1 Development targets of the Southwark Plan states that we will work with our partners, local communities and developers to ensure that developments deliver the required growth and improvements to achieve our targets including 40,035 homes between 2019 and 2036 (2,355 new homes per annum). Similarly, the draft OKR AAP sets out the phased delivery target of 20,000 homes.

57. In line with London Plan and Southwark Plan ambitions, the development would make a contribution to the borough's housing stock and combined with a policy compliant affordable housing offer. This represents a positive aspect of the scheme.

Old Kent Road Phasing

58. The GLA and Transport for London (TfL) officers have worked closely with Southwark Council officers to agree the broad geography and phasing of development in the area covered by the OKR AAP, to help provide certainty to communities, local businesses and developers in advance of the Bakerloo Line Extension (BLE) and a clear timetable for its delivery. This has resulted in broad agreement between the GLA, TfL and Southwark Council on the scale and geography of the area's new town centres, where industrial uses will be retained, replaced and intensified, and how housing delivery will be phased in advance of the BLE. Broad alignment and the location of potential tube stations has also been agreed between Southwark Council and TfL and formal safeguarding is in place (which is further discussed later in the below paragraphs).
59. As part of this process, a cap of 9,500 net additional homes has been agreed for Phase 1 until a BLE construction contract is in place. It should be noted that there is an extant permission on this site for 46 residential units and is still within the time limit of 3 years and fell within Phase 1. This scheme would increase this to 59 units (an additional 13) and is not considered to be a significant increase to impact on the local transport infrastructure.

Prematurity

60. Legal Advice received in relation to this issue highlights the following from the National Planning Policy Guidance:
61. "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.
62. 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."

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

Conclusion on Land Use

64. The scheme would deliver regeneration benefits, including a contribution to the borough's housing stock, 35.5% affordable housing, job creation, and the increase in commercial space to the development. It is therefore considered that the development, in land use terms, is acceptable and its contribution to the surrounding Old Kent Road Opportunity Area (OKROA) should be supported.

AFFORDABLE HOUSING AND DEVELOPMENT VIABILITY

Affordable Housing

65. The NPPF requires affordable housing as part of major residential developments. Policy H4 (Delivering affordable housing) of the London Plan sets out the strategic target that 50% of all new homes delivered across London are to be genuinely affordable. Policy P1 of the New Southwark Plan requires development that creates ten or more homes to provide the maximum viable amount of social rented and intermediate homes and the minimum amount should be 35%.
66. In accordance with Policy P1 of the Southwark Plan, the proposed development provides 35.5% affordable housing (by habitable room), comprising a mixture of social rent and intermediate housing. Policy P1 sets a requirement for a minimum of 25% of all the housing to be provided as social rented and a minimum of 10% intermediate housing to be provided.

Table: Housing mix

Tenure	Studio	1-bed	2-bed	3-bed	Total homes	Hab rooms
Proposed social rent	0	5	1	6	12	48
Proposed Intermediate	0	1	1	2	4	16

Market sale	7	16	16	4	43	109
Total	7	22	18	12	59	180
Percentage	11.9%	37.3%	30.5%	20.3%		
Affordable housing						
(by hab room) 35.5%						

67. In total, 180 habitable rooms would be provided in the development. The development would provide a total of 64 affordable habitable rooms, which would equate to an overall provision of 35.5%. The level of provision is therefore acceptable and policy compliant.
68. In accordance with the Rent Standard Guidance social rents are set as formula rents which by definition are exclusive of service charges. The Guidance allows for social rents to increase by CPI+1% and the mechanisms in the s.106 brings services charges in line with that by limiting increases in service charges to the lower of CPI+1% or such other limit imposed by Government. This would be secured in the s106 agreement.
69. The s106 agreement would secure the delivery of these units, including clauses to prevent the occupation of more than 50% of the private apartments until 50% of the affordable units are completed. In line with the Mayor's Affordable Housing and Viability SPG, an early review mechanism would be secured in the s106. The review would determine whether the viability of the development has improved during that time, and accordingly whether it could deliver any more affordable housing.

Development Viability

70. Southwark's Development Viability SPD requires a financial viability appraisal (FVA) to be submitted for all planning applications, which trigger a requirement to provide affordable housing. The financial viability appraisal should identify the maximum level of affordable housing that can be sustained and justify any proposed departures from planning policy requirements. The appraisal submitted was reviewed by an independent consultant, acting on the Council's behalf.
71. The Council's consultant has reviewed the FVA prepared on behalf of the applicant, which concludes that the proposed scheme when benchmarked against a site value of £ £944,000 the proposed scheme generates a surplus of circa. £3,833. This differs slightly from the applicant's appraisal of the scheme generating a deficit of £269,000. On that basis, the Council's consultant notes that residential sales values are one of the remaining areas of disagreement with ULL and it is feasible that a small reduction in these values would worsen the viability of the scheme so that it produced a deficit. Given the relatively small scale of this surplus it is considered reasonable to conclude that the current affordable housing offer reflects a break even position and therefore the scheme cannot viably deliver any more affordable housing.

Conclusion on Affordable Housing

72. The level of affordable housing secured represents a benefit of the proposed development. It should be noted that the applicant had tried to secure an RP for over 12 months since the grant of the extant planning permission to no avail. The scheme has been amended to enable the best chance of securing an RP – which has been made. The delivery of this scheme including the increase in the overall number of affordable housing is therefore welcomed.

DESIGN CONSIDERATIONS

73. The NPPF stresses that good design is a key aspect of sustainable development and is indivisible from good planning (paragraph 124). Chapter 3 of the London Plan seeks to ensure that new developments optimise site capacity whilst delivering the highest standard of design in the interest of good place making. New developments must enhance the existing context and character of the area, providing high quality public realm that is inclusive for all with high quality architecture and landscaping.
74. The importance of good design is further reinforced in the Southwark Plan Policies P13 and P14 which require all new buildings to be of appropriate height, scale and mass, respond to and enhance local distinctiveness and architectural character; and to conserve and enhance the significance of the local historic environment. Any new development must take account of and improve existing patterns of development and movement, permeability and street widths; and ensure that buildings, public spaces and routes are positioned according to their function, importance and use. There is a strong emphasis upon improving opportunities for sustainable modes of travel by enhancing connections, routes and green infrastructure. Furthermore all new development must be attractive, safe and fully accessible and inclusive for all.

Site Layout

75. The development is a single block, optimising the whole of the site area. The ground floor layout would have main entrances from the Ilderton Road frontage, but would also have active frontage on Hornshay Street with the full double height commercial glazed facade.
76. The eastern side of the ground floor would face the railway embankment and as such is mainly used as the location of servicing for the commercial element as well as access for the cycle storage to the rear. This would be away from the residential entrance on Ilderton Road and is supported.
77. The ground floor residential entrance would be set back by a metre, in order to create a more generous approach to the residential lobby.

Height Scale and Massing (including consideration of Tall Buildings)

78. London Plan Policy D9 provides guidance on tall buildings. The policy sets out a list of criteria against which to assess the impact of a proposed tall building (location/visual/functional/environment/cumulative). London Plan Policy D4 requires that all proposals exceeding 30 metres in height and 350 units per hectare must have

undergone at least one design review or demonstrate that they have undergone a local borough process of design scrutiny.

79. Southwark Plan Policy P17 deals with tall buildings. The policy identifies this site as suitable for tall buildings as it is located within the Old Kent Road opportunity core area. The policy sets out a list of requirements for tall buildings of which the policy states that tall buildings must:
1. Be located at a point of landmark significance; and
 2. Have a height that is proportionate to the significance of the proposed location and the size of the site; and
 3. Make a positive contribution to the London skyline and landscape, taking into account the cumulative effect of existing tall buildings and emerging proposals for tall buildings; and
 4. Not cause a harmful impact on strategic views, as set out in the London View Management Framework, or to our Borough views; and
 5. Respond positively to local character and townscape; and
 6. Provide a functional public space that is appropriate to the height and size of the proposed building; and
 7. Provide a new publicly accessible space at or near to the top of the building and communal facilities for users and residents where appropriate.\
80. Policy 8 of the Draft OKR AAP sets out a tall building strategy with the 'Stations and Crossings' reinforcing the proposed hierarchy of buildings. The three tier strategy defines a clear building height strategy across the opportunity area. 'Tier One' buildings represent developments that exceed 20 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. Mid height 'Tier Two' buildings proposes building heights within the range of 16 to 20 storeys to mark places of local importance to help define their character and assist wayfinding. 'Tier Three' tall buildings up to 15 storeys will act as markers within the neighbourhood.
81. As the site is in the AAP core area, it is considered an acceptable location for tall buildings which optimise housing delivery and regeneration benefits. It should also be noted that a tall building was previously accepted on the site under extant permission 18/AP/2761. This scheme would increase the height from an approved 45.3m AOD to 56.5m (an increase of 11.2m). It would be an increase from part 12-13 storey building to 15 storeys and the site is not identified as a Tier Three building location in the draft OKRD AAP. However the draft AAP does show a building of 13 storeys on the site in a similar form to that proposed. It should also be acknowledged that development immediately to the south of the proposal, at 313-349, is between 11 to 15 storeys high, thus creating a consistent massing height from the site to the Tustin Estate.
82. In addition, the Tustin Estate is undergoing redevelopment involving the erection of a series of buildings ranging from 2 storeys to 21 storeys. A planning application under ref 22/AP/1221 went to Planning Committee on 19 July 2022 with a resolution to grant

subject to completion of s106 agreement and referral to the Mayor. It is considered that the proposed height at 301-303 Ilderton Road would be compatible with the emerging townscape and heights of buildings.

83. Although the proposal is considered a tall building, it is not considered that this proposal would result in any harm to designated London wide or local protected views, including the Protected Vista of 2A.1 of the London View Management Framework, which protects views from Parliament Hill Summit to St. Paul's Cathedral. This is demonstrated in their townscape and visual impact assessment and the additional wireframe visualisations. The site is not in any Borough views.
84. It is also noted that the site to the north on Canterbury Industrial Estate is likely to be developed in the future, which may either be of similar height to that proposed in this scheme or potentially taller given the greater size of that site.

Architectural Design and Materiality

85. Southwark Plan Policy P14 sets out the criteria for securing high quality design. In respect of architectural design and materials the policy requires all developments to demonstrate high standards of design including building fabric, function and composition; presenting design solutions that are specific to the site's historic context, topography and constraints; responding positively to the context using durable, quality materials which are constructed and designed sustainably to adapt to the impacts of climate change.
86. **Image: Proposed elevation**



87. The proposed scheme has introduced a design that seeks to reference the historic

industrial use of the area. Since the approval of the extant permission 18/AP/2761, an application to make non-material minor amendments (s96a) was approved in August 2020. It was considered that those amendments would not be material and that the vertical emphasis from the elevational changes would be accepted. The current proposal would continue with this design and materiality.

88. The proposed windows would align so that there would be a vertical emphasis. Brick pilasters run down the elevation to provide articulation and further verticality. The balconies are also aligned to create a clearly defined primary vertical element on the facade. Brick arches on the ground and first floor elevation would reference the railway to the rear of the site. The ground and first floor levels would have floor-to-ceiling height under the arches providing that active frontage along Ilderton Road and Hornshay Road. The fenestration and the brick arch would have sufficient depth of a full brick to allow for visual interest. The proposed design would also add brick feature panels in a more regular arrangement when compared with the approved scheme. The applicant has submitted detailed bay studies and section drawings, which show a full brick depth reveal at the windows and this is encouraged. These details would be secured via a condition.
89. The rear elevation (facing the railway) would also have a regular vertical arrangement and a recess down the core, which provides for a visual break. This elevation is also important as it is clearly visible from afar and along the railway line.

Image: Materiality palette



90. The design guidance in the AAP for this site allocation is that the design of buildings in this area should reflect its robust and functional industrious character. AAP 10 (Design) also notes that developments should use high quality, durable building materials that contribute to a sense of quality and place. It goes further by saying that the predominant use of brick or similar materials is strongly encouraged as this is the dominant material use in existing and consented schemes within the opportunity area.
91. The materials used in this development would predominantly be brick with concrete lintels above the windows. The main brick would be light buff coloured and the ground floor with a small element of engineering brick used on the ground floor. Aluminium framed windows would be used. It is considered to be appropriate and a condition to secure samples and tone of brick is recommended.

92. Image: Looking south



93. Image: View from Hornshay Street towards east elevation



94. Image: View from Ilderton Road towards south elevation



95. There are no conservation areas or listed buildings in the vicinity of the application site. Since the granting of the previous planning permission and its associated s96 amendments, there are two new conservation areas in this part of the opportunity area:
- Kentish Drovers and Bird in Bush Conservation Area
 - Livesey Conservation Area.
96. There is also the Caroline Gardens Conservation Area. The closest conservation area Kentish Drovers is at least 450m from the development site and is not considered to be negatively affected.

Conclusion on Design Issues

97. The high quality architecture is considered to enhance the existing and emerging townscape whilst referencing the surrounding context. Submitted section details and material samples ensure that there would be depth and articulation to facades. This level of detail would be secured through the inclusion of conditions in order to ensure that this level of design quality is maintained in the construction of the proposal. It is also recommended that the current architects (TDO) is retained unless otherwise agreed as this would maintain design quality and consistency.

Public realm

98. The proposed building is proposed up to the existing site boundary on Ilderton Road and Hornsay Street. The precise width of the foot way and the location of any loading bay could be agreed via the S278 process. It is acknowledged that the existing condition of Ilderton Road and surrounding streets present a generally poor environment for walking and cycling. The proposals here would provide an improvement to the public realm, including along Hornshay Street and the route to Bridgehouse Meadows.

Landscaping and Urban Greening Factor

99. Policy P59 of the Southwark Plan (Green infrastructure) states that major developments that are referable to the Mayor of London must provide new publically accessible open space and green links. Additionally, developments should provide multiple benefits for the health of people and wildlife, and to integrate with the wider green infrastructure network and townscape / landscape, increasing access for people and habitat connectivity. Point 3 of London Plan Policy G1 (Green Infrastructure) requires Development Plans and Opportunity Area Planning Frameworks should identify key green infrastructure assets, their function and their potential function. They should also identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.
100. 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.
101. The site is small and has an irregular shaped plot, which makes it difficult to provide new publically accessible open space. The development optimises the site to ensure that it can viably delivered.
102. There are no existing trees on the site. The adjacent railway embankment trees could be appropriately pruned as proposed without loss of amenity. The applicant had previously agreed to pay a contribution of £3,000 per tree for planting elsewhere in the opportunity area or planting in the new park space to the north. It is considered appropriate to secure the same obligation.
103. Whilst there would be limited landscaping proposed at ground level (bar the green wall trellises to the rear of the site), the applicant would landscape the roof level to provide an attractive amenity area for the future residents. This comprises intensive green roofs with planting. After much discussion between the applicant, the GLA and Officers, it was confirmed that the green walls fixed to a trellis (2.5 high) would not be fixed to the building wall as it could present a fire risk. It is being accepted in this case to contribute to the urban greening score, but it is understood at the time of writing that the GLA would be reviewing how green walls should be fixed to buildings and planters. As such, this method of increasing the urban greening score should not be seen as a precedent for future applications. Hard and soft landscaping details shall be secured via a condition to ensure that the right species of planting are appropriate.
104. The site at present would score 0 as it is covered by a building and a sealed concrete surface. Following the introduction of the above features, the UGF would be 0.27. Whilst this is below the target of 0.4, it should be noted that this is a target and the 0.27 is an improvement from what currently exists on site. Given the small plot, it would be difficult to achieve the 0.4. It is considered acceptable in this instance. It should be

noted that this should not prejudice future decisions on other larger sites in the opportunity area to achieve a target of 0.4 and should be assessed based on its merits.

Image: Illustrative landscaping on the roof (subject to minor changes following securing of details)



Ecology

105. The site in its current condition is of little or no ecological value and therefore its redevelopment offers the opportunity to enhance biodiversity opportunities. There would be a net gain on this site.
106. The site adjoins a Site of Importance for Nature Conservation (SINC) designated by Lewisham Borough Council. Whilst a full ecological assessment is not required, a preliminary bat roost inspection survey of the site was carried out given that it adjoins a borough grade SINC.
107. The Council's Ecology officer has considered the findings and concluded that it was acceptable and no further surveys were required. The Council's Ecology officer had previously recommended that a 'green edge' (such as a green wall) adjacent to the SINC boundary be provided, which would essentially be a buffer between the development and the SINC. Given the potential fire risks, Officers have made a balanced judgement and consider that this is not necessary and the green wall on the trellis would suffice in this instance. The Ecology Officer has also recommended a condition to secure a biodiverse roof, which could be installed under the proposed PV panels to optimise their performance.

HOUSING MIX, DENSITY AND RESIDENTIAL QUALITY

Housing Mix

108. Southwark Plan Policy P2 seeks to ensure that a minimum of 60% of homes with two or more bedrooms is provided. A minimum of 20% of family homes with three or more bedrooms are sought in the Action Area Cores. The policy also requires two bedroom homes as a mix of two bedroom 3 person and two bedroom 4 person homes.

109. Policy H10 of the London Plan relates to housing size and mix; it seeks to guide borough and developers on unit mix within new residential developments, and states that schemes should generally consist of a range of unit sizes having regard to robust local evidence, the requirement to deliver mixed and inclusive neighbourhoods and the range of tenures in the scheme.

<u>Dwelling size</u>	<u>No. of units</u>	<u>Percentage</u>
Studios	7	11.9
1 Bedroom	22	37.3
2 Bedrooms	18	30.5
3 Bedrooms	12	20.3
Total	59	100

110. At 11.9 %, the proportion of studio units exceeds the maximum of 5% permitted. However, the inclusion of a greater number of smaller units is a result of the need to make an efficient use of a small narrow floor plan on such a constrained site. It should also be noted that none of the studio units would be allocated to the affordable tenures. A higher proportion of studio apartment was accepted under the previous consent (at 13%).
111. The above table shows that 50.8% of the units would have two bedrooms or more and falls below the 60%. For the affordable housing however, the mix is much improved to the policy position, with 62.5% having two or more bedrooms and 50% having three bedrooms.
112. In all, 6 x 3 bedroom social rent flats would be provided and 2 x 3 bedroom intermediate affordable units. This affordable mix is welcomed despite the shortfall for the scheme overall, which reflects the challenge of planning a relatively narrow site. Officers note that there is a need for 4 bedroom units in Old Kent Road. The applicant has explored options with officers to provide larger family sized units (4 bedroom flats), but given the relatively long and thin plan form this would result in significantly oversized units and a reduction in the overall number of affordable habitable rooms. It is therefore not possible to deliver any 4 bed units due to site constraints and this was accepted in the extant permission. Officers consider that the overall mix is considered acceptable.

Wheelchair Housing

113. In compliance with Policy D7 of the London Plan, P8 of the Southwark Plan, and emerging policy AAP 4 of the Draft OKR AAP, at least 10% of the dwellings across the subject site will meet Building Regulation M4(3) 'wheelchair user dwellings'. Two of the social rented homes would meet Building Regulation M4(3)(2)(b) 'wheelchair

accessible dwellings' and four of the private units would be 'wheelchair user dwellings' and thus available for immediate occupation. All other dwellings will be delivered to meet M4(2) 'accessible and adaptable dwellings' standards.

Density

114. The Southwark Plan does not contain specific density matrices and ranges for different areas of the borough. Instead, it sets out a range of criteria relating to good design and appropriate density in the context of a site-specific approach, including in policies P13 Design of places, P14 Design quality, P15 Residential design and P18 Efficient use of land. Criteria across these policies require among other things that:

- Development's height, scale, massing and arrangement responds positively to the existing townscape, character and context;
- Buildings, public spaces and routes are positioned according to their function, importance and use within the townscape;
- Adequate daylight, sunlight, outlook and a comfortable microclimate is accommodated for future and existing occupiers
- Development provides a high standard of residential design quality
- Development optimises the use of land and does not unreasonably compromise development potential on neighbouring sites.

115. This approach is consistent with the London Plan, within which policy D3 refers to optimising site capacity through a design led approach.

116. The quality of the proposed units, the acceptability of the height and massing, the architecture, the townscape impacts, the neighbour amenity impacts and transport implications are set out in detail in the relevant sections of this report.

Quality of Residential Accommodation

117. London Plan Policy D6 (Housing quality and standards) states that housing developments should be of high quality and provide adequately-sized rooms, with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners. The policy sets out a range of qualitative design aspects for housing developments relating to dwelling size, aspect, daylight, layout and amenity space. Policy P15 Residential design of the Southwark Plan sets out that development must achieve an exemplary standard of residential design and must take into consideration the site context, the impact on the amenity of adjoining occupiers, and the quality of accommodation.

Unit Size

118. Policy P15 of the Southwark Plan requires developments to meet the minimum national space standard. All of the units would comfortably meet or exceed the minimum total GIA space requirements set out in the nationally described space standards and as set out in the 2015 Technical Update to the Residential Design Standards SPD. There would also be good floor to ceiling heights and glazing. All kitchen units would be naturally ventilated and lit.

Aspect

119. The scheme will deliver 66% in dual aspect, with only the studios and 1 bed units delivered as west facing, single aspect units. No north facing single aspect units are proposed and all of the three bed units would be dual aspect.

Internal daylight within the proposed residential units

120. A daylight and sunlight report based on the Building Research Establishment (BRE) Guidance has been submitted which considers daylight to the proposed dwellings using the Average Daylight Factor (ADF). ADF is a measure of the overall amount of diffuse daylight within a room. It is the average of the daylight factors across the working plane within a room. ADF determines the natural internal light or daylight appearance of a room and the BRE guidance recommends an ADF of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens. This also adopts an ADF of 2% for shared open plan living room/kitchens/dining.
121. All habitable rooms (kitchens, living, dining rooms and bedrooms) within these dwellings were assessed. The results indicate that all of the assessed habitable rooms meet the required ADF target set out by the BRE.
122. The revised BRE guidelines was published in June 2022. It affects the proposed units' internal daylight and sunlight calculations (the ADF approach to assessing levels has been removed, although the ASPH test is retained, and there is no change to assessing the impact on neighbouring properties). Having to comply with the latest guidelines would require a complete reassessment of the flats. It should also be acknowledged that this application has been in since December 2020 (well before the revised BRE guidelines were published) and is at a late stage that some flexibility should be given.
123. The Daylight Distribution (DD) method was also used, which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of 20% in the area of sky visibility, daylight may be affected. The results of this test showed that all of the rooms would meet the BRE guidelines.
124. In terms of 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. The assessment shows that 135 of the 155 rooms (87%) would comply with the BRE guidelines for APSH, which is considered a high level of compliance. The 14 Living/kitchen /dining rooms (LKD) not meeting the guidelines are served by windows on the north elevation with windows facing east or west below balconies. Balconies in this instance is restricting sunlight amenity into the rooms – though the balconies themselves would receive good levels.
125. The analysis demonstrates that daylight and sunlight amenity within the proposed residential accommodation will be very good and in full accordance with BRE guidance.

Overlooking and Privacy within the Proposed Development

126. 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.
127. The site is some distance from existing and future neighbouring residential buildings being separated from roads and railway line and would therefore not suffer from any overlooking and would have a good level of privacy within the proposed units.

Number of Units Per Core

128. Each floor serves 4 units sharing a core, complying with the Mayor's Housing Design standards which advises no more than 8 flats per core.

Amenity Space and Playspace

129. All new residential development must provide an adequate amount of useable outdoor amenity space. The Residential Design Standards SPD sets out the required amenity space standards which can take the form of private gardens and balconies, shared terraces and roof gardens. Policy S4 of the London Plan requires new developments to make provision for play areas based on the expected child population of the development. Children's play areas should be provided at a rate of 10sqm per child bed space (covering a range of age groups). In addition, P15 of the Southwark Plan requires the provision of 5sqm of public open space per dwelling.
130. Flatted developments must provide 10 sqm of private amenity space for units containing three or more bedrooms. For units containing two or less bedrooms, 10 sqm of private amenity space should be provided. Where this is not possible, as much space as possible should be provided as private amenity space, and the shortfall added to the communal amenity space requirement.
131. In this case, a total of 590sqm of private amenity space would need to be provided between the 59 units. In this instance 543.5sqm of private amenity space is proposed, which is short of the required amount. Notwithstanding this, all flats have been provided with private amenity space in the form of balconies with the minimum of 5sqm for the studios and one bedroom flats. The three bedroom flats which are considered to be family sized units would have a minimum of 10sqm. This is considered acceptable.

Communal Amenity Space

132. Where the full recommended provision of 10sqm per residential unit has not been provided, the shortfall has been added to the communal requirement. The shortfall is 70sqm, which means a total of 120sqm (plus 50sqm) of communal amenity space would be required. The proposed development proposes 115sqm of communal amenity space on the roof, which means a marginal shortfall of 5sqm. However, the scheme would also need to provide playspace on the site and thus the shortfall is considered acceptable given that it is so marginal. A financial contribution shall be sought for this shortfall (£1,025).

Playspace

133. The Mayor's SPG sets out the intended strategic approach to delivering new and enhanced play space both on and off-site in new developments. It explains that 'doorstep' play (Under 5s) should usually be provided on-site, unless there is existing provision within 100 metres. For 5-11 year olds and children over 12 years old, it recommends that off-site provision is acceptable, if there is existing provision within 100-400 metres and 400-800 metres respectively. This is summarised in Table 4.5 of the SPG, reproduced below.

Table 4.5 of the Mayor's Providing for Children and Young People's Play and Informal Recreation SPG

Table 4.5 Provision of play space to meet the needs of new development

		Under 5s	5-11	12+
Existing provision	within 100 m	On site or off-site contribution	Off-site contribution	Off-site contribution
	within 100-400m	On-site	On site or off-site contribution	On site or off-site contribution
	within 400-800m	On-site	On-site	On-site or off-site contribution
No existing provision	within 100 m	On-site	Off-site provision	Off-site provision
	within 100-400m	On-site	On-site	On site or off-site provision
	within 400-800m	On-site	On-site	On-site

134. Using the GLA playspace calculator, 225.3sqm of playspace would be required. The scheme provides 244sqm of playspace on the roof, which exceeds the minimum and is considered acceptable. There would be areas of the proposed playspace that would sit under the pergola (which supports the PV panels) and provides shelter for the users. The Mayor's SPG states that the spaces should be inclusive and that differentiation of space, if any should be blurred, not rigid to allow mixed use of spaces and use by family and groups of different ages.

135. The landscape design proposed within the roof space would dedicate play facilities for all age groups. The details would be secured by condition as recommended. The spaces would be welcoming for children and young people of all ages and abilities, but also for parents and carers as well as any resident of the development. The parapet walls railings are of sufficient height that allows for the play space to be protected and function well.

136. In total, approximately 359sqm of amenity space is provided on the roof and whilst there is a marginal shortfall of communal space, the scheme is considered acceptable.

Public Open Space

137. In addition to the adopted amenity space requirements set out above, emerging Policy AAP11 of the draft OKR AAP requires the provision of 5sqm of public open space per proposed home. The plan identifies that some sites are expected to provide public space as part of their redevelopment and others are not. In the latter instance, those sites will be expected to make s106 contributions to off-site public space provision. This will be charged at £205 per square metre. As set out in the Section 106 and CIL SPD, £205 per sqm represents the average cost for improving open space in Southwark.
138. This would equate to 295sqm of public open space for the scheme. This site is not identified within the AAP as providing public open space. The applicant has agreed to make the contribution of £60,475 based on the 59 dwellings proposed and can be secured by the legal agreement.

Noise

139. The site is located within the LSIS, and the proposed residential units would adjoin existing commercial units to the north and south, although these sites may come forward with similar mixed schemes. The site to the south (313-349 Ilderton Road) is already under construction for student accommodation and housing. The railway line and associated arches is located immediately to the east of the site. A noise impact assessment has therefore been undertaken to assess whether the site would be suitable for residential development. The report has been reviewed by the Council's Environmental Protection Team (EPT) and a condition to secure appropriate internal noise levels is recommended, which should minimise the likelihood of noise complaints against the existing and proposed industrial occupiers.

Secured by Design

140. The design of the development has considered opportunity for natural surveillance, incorporates excellent lines of site and the development should 'activate' this area. It is recommended that an external lighting scheme be submitted for the area to the rear of the site including the servicing space. Given the above, the development is considered to provide good crime prevention measures within the overall design.
141. The Metropolitan Police Secure By Design Officer is fully supportive of this development and request for the developers/ architects to make contact in order to pursue the Secured by Design requirements competently. They also request that the condition (Secure by design) that was previously imposed on the extant permission is retained for this development.

Conclusion on Quality of Accommodation

142. The floor layouts and size of the units proposed would meet or exceed the minimum and the habitable room would have good levels of daylight and sunlight. At least 66% of the units would be dual aspect and only 4 units share a core per floor. Whilst a small number of the units would be single aspect, these are the studios and one bedroom units that overlook Ilderton Road, which would not have any obstructions and have a good outlook. Each unit is provided with a balcony and all family sized dwellings would have at least 10sqm of private amenity space. It is therefore considered that the

proposed development would provide a high quality of accommodation for future residents.

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

143. Policy P56 (Protection of amenity) of the Southwark Plan states that developments should not be permitted when it causes an unacceptable loss of amenity to present or future occupiers or users. This includes privacy and outlook impacts, overlooking or sense of enclosure, loss of daylight and sunlight, and unacceptable noise from developments.

Impact of the Proposed Uses

144. The proposed non-residential floorspace would be likely to be more compatible with residential uses than the existing uses. The noise transmission would be controlled by planning conditions, as recommended by the Council's EPT. Overall it is not considered that any of the uses proposed would result in any significant loss of amenity to neighbouring residential occupiers, nor would they hinder the operation of the neighbouring industrial and warehousing units.

Daylight and Sunlight Impacts

145. 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 BRE. As required by Regulations, the submitted assessment has been undertaken by competent, experienced, registered professionals.

BRE Daylight Tests

146. While the BRE 2011 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:
147. "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."
148. 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.

149. 25 degree line

To determine whether a neighbouring existing building may be adversely affected, the initial test provided by the BRE is to establish if any part of the proposal subtends an angle of more than 25° from the lowest window serving the existing building. If this is the case then there may be an adverse effect and a more detailed assessment involving the Vertical Sky Component of the affected window would need to be carried out.

150. VSC

The BRE guideline tests undertaken for this daylight assessment are the Vertical Sky Component (VSC) and No Sky-Line (NSL). The VSC test calculates the angle of vertical sky at the centre of each window and plots the change between the existing and proposed situation. The target figure for VSC recommended by the BRE is 27%, which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE also advises that VSC can be reduced by about 20% of its original value before the loss is noticeable. In other words, if the resultant VSC with the new development in place is less than 27% and/or less than 0.8 times its former value, then the reduction in light to the window is likely to be noticeable.

151. Daylight Distribution

The second method is the No Sky Line (NSL) or Daylight Distribution (DD) method, which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of 20% in the area of sky visibility, daylight may be affected.

BRE Sunlight Tests

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

- receives less than 25% of annual probable sunlight hours, or less than 5% of annual probable sunlight hours between 21 September and 21 March and
- receives less than 0.8 times its former sunlight hours during either period and
- has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours.

Overshadowing

153. 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.'

154. The neighbouring residential units that have the potential to be impacted in terms of daylight and sunlight are located at:
- Tustin Estate
 - Manor Grove
 - Canterbury Industrial Estate
 - 313-349 Ilderton Road
 - Wheelshunters Social Club (flat above)
155. It should be noted that the applicant has also carried out an impact assessment based on speculative future developments at the Canterbury industrial estate site. The current uses on the site are commercial/industrial and therefore would not normally be required to be tested. Following discussion with the applicant, a cautious approach by including future residential development on this site has been tested. As the development on the Canterbury Estate is currently only a speculative development the hypothetical massing and window sensor locations have been estimated in accordance with the AAP and has assumed a building up to 9-storeys abutting the boundary. Officers consider this to be an appropriate approach given that the OKR AAP notes that taller buildings could be accommodated on the east side of Ilderton Road.

Daylight impacts

Tustin Estate (Heversham House)

156. The VSC results show that of the 36 bedroom windows tested, 18 (50%) would comply with the BRE Report guidelines using this test. The 18 windows not meeting the guidelines would retain between 0.67 and 0.78 times the VSC in the existing conditions, only marginally below the BRE Report recommendation of 0.80. Each of these windows would retain between 22.50% and 26.90% VSC, figures that are considered high for an urban environment.
157. The DD results for the bedrooms show that all 36 will comply with the BRE Report guidelines using this test.
158. The applicant notes that the kitchen windows are smaller than a standard habitable room but they were still tested. It should be noted that these kitchen windows are setback into the building and are therefore 'blinkerred' by Heversham House itself. The analysis results show that 4 of the 36 kitchen windows assessed (11%) would comply with the BRE Report guidelines. Of the 32 windows not meeting the guidelines 14 would retain at least 0.70 times the existing VSC value and the remaining 18 would retain between 0.59 and 0.69 times the existing VSC.
159. Using the DD analysis, the results show 34 of the 36 kitchens would comply with the BRE Report guidelines, retaining direct skylight to at least 0.80 times the area in the existing conditions. The two kitchens not meeting the guidelines would retain direct skylight to 74% and 75% of the room area, only marginally below the 80% recommendation.

160. In terms of sunlight amenity, all 36 of the bedroom windows (100%) would comply with the BRE Report guidelines for winter sunlight and 24 (86%) would comply with the guidelines for annual sunlight (APSH). The twelve windows not meeting the guidelines serve first and third floor bedrooms and would receive between 21% and 24% APSH, only marginally below the BRE Report recommendation of 25%. The applicant has carried out tests on the kitchen windows, but given that these do not have eating areas it is not considered to be as important.
161. There is an area of grassed amenity space in front of Heversham House. The overshadowing tests show that the entire area will continue to receive at least 2 hours of direct sunlight on 21 March, well in excess of the guidance given in the BRE Report.

Manor Grove

162. This building is located to the north-west of the application site. The buildings at Manor Grove would comply with this initial 25 degree test and therefore, in accordance with the BRE guidelines, no further daylight or sunlight tests are required as these existing buildings will not be adversely affected by the proposed development.

313-349 Ilderton Road

163. This development is currently under construction and the applicant had used the plans associated with the permission to assess the impacts on the future residents. The assessment looks at the windows closest to 301-303 and up to level 8. The analysis results show that all 42 windows tested (100%) would comply with the BRE Report guidelines using the VSC test and all 14 rooms (100%) would comply with the guidelines using the DD test.
164. No windows face within 90 degrees due south and therefore sunlight is not an issue. There are no amenity spaces in close proximity to and to the north of the development and therefore an overshadowing assessment was not deemed necessary.

Canterbury Industrial Estate

165. A VSC facade study was carried out on the speculative development, which shows that the entire residential façade facing the development would retain at least 17% VSC. Whilst the ideal is 27%, it should be noted that this is considered to be relatively good level for this dense part of inner London location. Therefore, any future development of Canterbury Industrial Estate could be designed so that good levels of daylight could be received.
166. Turning to sunlight amenity, the APSH façade study shows that the entire façade would receive at least 25% APSH in the proposed conditions. This demonstrates that good levels of sunlight amenity would be received to any future development.

Wheelhunters Social Club

167. This social club is located to the east of the development on the other side of the railway embankment and is within the London Borough of Lewisham. According to

Valuation Office Agency records, contains a flat at first floor. This property also has a communal amenity area to the west, located behind the fence.

168. The analysis results show that all of the windows facing the site would comply with the BRE Report guidelines for both daylight and sunlight amenity.
169. In the proposed conditions, the communal amenity area would receive at least 2-hours of direct sunlight to 81% of its area on March 21st, in line with BRE Report guidance.

Daylight and sunlight conclusions:

170. It is considered that whilst there would be some noticeable reductions to the windows of the neighbouring properties, the retained VSC values are appropriate for such an urban location. Overall, the impacts on daylight and sunlight to neighbouring buildings are limited.

Overlooking of Neighbouring Properties

171. 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.
172. These distances are all met in terms of the impact of the proposal on adjacent buildings. As such, it is not considered that the proposed development would result in significant loss of privacy.

Outlook

173. It is considered that the proposed development will provide an improved outlook for nearby residential properties as the scheme would place a site that does not enhance the street townscape and is partly in a poor condition. The proposed development is of sufficient distance from neighbouring residential properties and would therefore not affect their outlook or appear overbearing.

TRANSPORT CONSIDERATIONS

174. 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.
175. The Mayors Transport Strategy (MTS) Mayors Transport Strategy (MTS) includes three strategic challenges that are of significant importance to assessing this application.
- Good Growth
 - New homes and jobs

- A good public transport experience

176. 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.

Accessibility and Trip Generation

177. The site has a Public Transport Access Level (PTAL) of 4, which is moderate. There are two bus stops within the vicinity of the site. Old Kent Road forms a signalised junction with Ilderton Road approximately 200m to the south of the site and providing access to further bus services.

178. In recognition of the increased pedestrian activity resulting from the development, pavements in front of the site, on Ilderton Road would be at least 2.4m wide. Ground floor entrance to the residential areas have been set back in order to create a more generous approach to the residential lobby.

179. The majority of trips made to the site would comprise vehicle trips as a result of its previous operation as a vehicle repair and car-wash centre. A total of 329 daily two-way trips by all modes would be generated over the course of a typical weekday and that includes 186 two-way vehicle movements (excluding service vehicle trips and car occupants), with 15 of these occurring during the AM peak hour period and 11 during the PM peak hour. The proposed 59 residential units and commercial on-site would generate in the region of 393 daily two-way trips by all modes, including 25 two-way vehicle trips over the course of a typical weekday, with 5 during the PM peak hour. This is a reduction of vehicles trips to and from the site.

180. The removal of much of the business related traffic and illegal parking in the area would improve road safety. The trip generation of vehicles of the proposed development would in fact, be reduced compared to the existing uses on site. It is not considered that the proposed development would negatively impact on the local highway network in terms of trip generation.

Highway Safety

181. During the assessment of the application, it was pointed out to the applicant that the proposed cycleway improvement works would include various alterations to the existing pedestrian infrastructure provided along Hornshay Street and Ilderton Road. In order to determine the potential impact of the cycleway in conjunction with the redevelopment proposals for the application site, it was advised that a Stage 1 Road Safety Audit (RSA) be conducted to further understand the relationship between the operation of the new cycleway and the site's proposed service yard. An independent auditing company therefore carried out a Stage 1 RSA in January 2022 to establish any potential safety hazards the cycleway may pose on delivery vehicle access into the site's proposed service yard.

182. In order to accommodate the Council's proposed cycleway, it was agreed in principle by Officers that refuse collections should be undertaken at the site from Ilderton Road, so not to obstruct the use of the cycleway along Hornshay Street. This was the strategy in the extant scheme. It is accepted that the proposal to provide a rear service yard from Hornshay Street should be retained under the current proposals, subject to the provision of revised swept path analysis. This has been provided and is acceptable.
183. The Council's Highway Officer has reviewed the safety audit and has suggested that the applicant be required to respond to further safety audits during the S278 process, as the design and implementation of the cycle scheme progresses concurrently.

Proposed Site Layout

184. Works on the public realm include improving footway quality along the street frontage. New improved footways will be provided as part of the s278 works associated with the proposals and a clause in the s106 will secure this. All works within the extent of the s278 agreement for Southwark will be done in accordance with Southwark Street Design Manual SSDM and TfL's Healthy Streets design guidance.

Servicing

185. There would be separate refuse stores for the different tenures located on the ground floor. A bulky waste store is located to the rear of the site. The commercial refuse store is shown to be within the unit itself. Whilst this should normally be separated from the unit, it should be noted that the commercial units are small and this was accepted under the extant permission. The residential refuse collections associated will take place from Ilderton Road as per the extant permission. Both the Transport Planning team and the Council's Highways management team acknowledged that the exact location of any loading bay could be agreed within the S278 agreement. Commercial waste will be arranged for collection by the tenant through a commercial waste collector.
186. Deliveries generated by the ground floor commercial uses would be accommodated within the rear service yard provided at ground floor level, accessible from Hornshay Street. This facility could accommodate scheduled delivery vehicle arrivals, such as planned courier trips generated by the ground floor commercial uses.
187. As recommended by Highway Officers, the design of the service yard incorporates gates which are set back 6.0m from the back of the nearside footway on Hornshay Street. Restricted access is required into the service yard to secure the cycle parking and refuse storage. The proposed access arrangement therefore provides space for delivery vans to wait prior to the gates being opened for scheduled vehicle arrivals. The waiting area would prevent delivery vans from obstructing the adjacent carriageway and cycle infrastructure. The location of the service yard is illustrated on the below extract.

Plan: Servicing yard

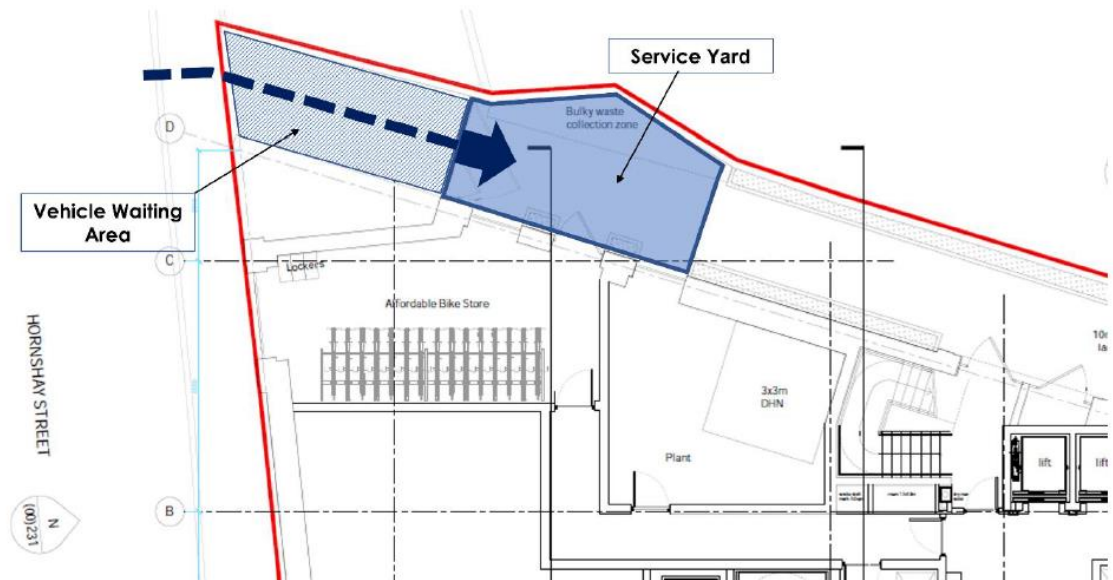


Figure 3.1. Proposed Service Yard

188. All loading activity associated with deliveries to the commercial units deliveries would be undertaken within the service yard, away from Hornshay Street and thus preventing any obstruction to vehicle, pedestrian and cycle movement.
189. In order to ensure that on-street servicing and deliveries do not negatively impact on the highway network, the Council is recommending that applicants in the Old Kent Road Opportunity Area enter into Delivery Service Plan Bonds against their baseline figures for all daily servicing and delivery trips. These bonds would be calculated at £100 per residential unit and £100 per 500sqm of non-residential floor-space. In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, this is not intended as a financial penalty, but as a means of mitigating any harmful impacts from the proposed development and ensuring a better quality of life for current and future residents. As such, it is considered to meet the CIL Regulations 122 test, in that it would be:
- (i) necessary to make the development acceptable in planning terms;
 - (ii) directly related to the development; and
 - (iii) fairly and reasonably related in scale and kind to the development.
190. The proposal is for the management of the new development to monitor the daily vehicular activity of the site both commercial and residential, quarterly for a period of 2 years from 75% occupancy. If the site meets or betters its own baseline target the bond will be returned within 6 months of the end of the monitoring period. If the site fails to meet its own baseline, the bonded sum will be made available for the Council to utilise for sustainable transport projects in the ward of the development. The Council will retain £1,600.00 for assessing the quarterly monitoring. The bond in this instance would be £5,900 based on the 59 residential units and 450sqm of non-residential floorspace. The applicant has agreed to the contribution, which can be collected via the legal agreement.

Car Parking

191. The site is not located in a designated Controlled Parking Zone (CPZ) and there are large sections of unrestricted on-street parking available on Hornshay Street and Ilderton Road in the immediate vicinity of the site. The western side of Ilderton Road and the northern side of Hornshay Road are subject to double yellow line restrictions.
192. The proposal is car free and there is no wheelchair parking. Whilst it is not located within a CPZ, the Council's programme for introduction and revision of CPZ's includes this area. The scheme does not provide any on-site wheelchair parking due to the site's triangular shape and small area. There is a need to replace the commercial floorspace and as a result, this meant that parking could not be provided on site. Whilst on-site parking would not be provided, Officers acknowledge that there is also a need for alternative types of specialist housing which meet the needs of people with disabilities that may not require the full wheelchair accessibility and parking option. It is also recommended that a condition to ensure all marketing of the development promotes car free living, to ensure the occupants are well aware they will not be entitled to permits. A s106 obligation would also ensure that no future residents or occupiers of the proposed development could obtain resident parking permits for any future CPZ.

Active Transport

193. A Healthy Streets Check was undertaken using TfL's Healthy Streets tool. The existing area surrounding the site scores well overall with respect to healthy streets indicators, achieving a score of 68 along Ilderton Road. The proposals would contribute towards modest improvements with a proposed score of 74, whilst no areas of pedestrian comfort would be compromised as a result of the proposals. Overall, it is evident the proposed scheme would contribute positively to the 'healthy streets' objectives.

Cycle Parking

194. A total of 106 long-stay residential cycle spaces would be provided in two separate cycle stores within the building. There would be short-stay cycle spaces to the front and rear of the site. The applicant has included a mix of Sheffield stands, covered hoops, double tier racks and spaces for larger cycles. Given the constrained site, it would be difficult to propose any more Sheffield stands.
195. Officers consider that conditions securing further details of cycle storage plus the provision of Brompton style cycle hire lockers equivalent to 1 locker per 10% of residential units (10% of which a EV lockers) would be sufficient. The Brompton Lockers offer a flexible cycle hire option to the residents and workers in the development. This was also accepted in the previous consent. TfL has requested contribution towards the cycle hire docking station nearby as well as funding for two years' free cycle hire use and the applicant has agreed to this.

Public Transport

196. As a borough, the Council agree 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 which, subject to the granting of powers and availability of funding, would be 2029/2030 at the earliest. The requirement for TfL to provide evidence to prove both previous contributions has been spent appropriately and the evidence for the further draw is the fairest way this could be managed. The proposal is that there is a maximum cap for TfL to call on which is £2,700 per unit. This will be able to be requested in stages between 3 - 5 years.

Construction

197. An outline Construction Logistics Plan (CLP) has been prepared to provide high-level information on the proposed construction logistics. TfL had requested that there be revisions to the CLP including finding an alternative to the proposed long-term temporary traffic signals, which are likely to lead to significant delays, including to buses, and potential impact on the nearby junction with Old Kent Road. However, this was accepted under the extant consent and Southwark's own Highways Team has not raised any objections. The S106 Agreement would secure a detailed Construction and Environmental Management Plan (CEMP) and a £40 per unit contribution for Construction Management monitoring within the OKR AAP area. This is to enable the Council to manage cumulative impacts on the highways and environment.

ARCHAEOLOGY

198. 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. Places within the borough that fall within the APA at Tier 1 is the highest level of APA indicating that there is a significant potential for archaeological remains of significance to be present within the defined area. In this case, Roman remains associated with Roman settlement and cemeteries, as well as the alignment of Old Kent Road along the southern side of the site which is believed to follow the course of a major Roman Road, Watling Street.
199. Policy P23 of the Southwark Plan 2022 requires that applications affecting sites within APAs should 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. An archaeological desk-based assessment has been submitted with the application, which has been reviewed by the Council's archaeologist. Whilst the Council's archaeologist did not concur with the conclusion of the assessment, it was acknowledged that the precautionary principle should be applied and there is sufficient information to establish that the development is not likely to cause such harm as to justify refusal of planning permission. This is provided that conditions are applied to any consent securing a programme of archaeological evaluation, mitigation and reporting.

ENVIRONMENTAL CONSIDERATIONS

Wind and Microclimate

200. The applicant has submitted a Wind and Microclimate assessment, which looks at the likely impacts of the proposed development on wind and microclimate in terms of pedestrian safety and comfort using a computer model. The following scenarios were tested:
- Proposed Site, Existing Surrounds: The completed and operational development with the existing surrounds; and
 - Proposed Site, Cumulative Surrounds: The completed and operational development with the existing surrounds, plus local planning consented schemes.
201. There are no wind safety or distress exceedances at ground level anywhere in the site of surrounding area. All ground level comfort conditions are suitable for their intended use, including building entrances and bus stops. The north west and south-west balconies are subject to conditions one category windier than required, as well as regions of distress exceedance. These will require mitigation, which is recommended in the form of full height angled railings (to give 50% porosity viewed head on), on the western elevation of each balcony. This will restrict the airflow onto the balcony and ensure conditions are suitable, whilst allowing the other edges of the balconies to have standard balustrades. Conditions on the majority of the roof terrace are suitable for the intended use, and not subject to wind safety concerns. There are some small regions near the gaps in the terrace parapet, which are a category windier than required as well as subject to distress exceedances. This will require mitigation, which is recommended in the form of angled railings (to give 50% porosity) across the gaps in the parapet. The report notes that once the cumulative schemes come forward, conditions will become calmer.

Fire strategy

202. 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.
203. A Fire Statement has been submitted by a suitably qualified assessor detailing how the development would achieve the highest standards of fire safety, including means of escape, fire safety features and means of access for fire service personnel. The provision of a suitably-sized evacuation lift is also proposed in line with Policy D5 of the London Plan. The measures contained within the statements would be secured by condition within the decision notice.
204. The Health and Safety Executive (HSE) was not consulted in this instance. The application was originally submitted in 2020 and this was prior to the requirement to consult the HSE.

Flood Risk and Water Resources

205. The application site is located within Flood Zone 3, which is considered to be 'High

Risk' but does benefit from the Thames tidal defences. The Environment Agency (EA) confirms that their most recent flood modelling (December 2017) shows that the site is not at risk if there was to be a breach in the defences. Therefore, the EA consider that the development will be at low risk of flooding.

206. The Council's Flood and Drainage Team has also reviewed the application and had various discussions with the applicant and notes that developments should seek to limit surface water discharges to the estimated greenfield runoff rate where practical. The proposed runoff rate of 2l/s is considered acceptable and improves upon the consented scheme. Therefore, no objections are raised to the proposed surface water strategy. As the strategy is indicative, detailed design should aim to achieve the proposed runoff rates and attenuation volume. A greenfield runoff rate offset of £366 per cubic metre will be secured in in event that there is a shortfall in attenuation required to limit surface water run off to 2l/s in a 1 in 100-year storm plus 40% climate change allowance.

Ground Conditions and Contamination

207. Given the previous use of the site, the applicant has submitted a site investigation report. The Council's EPT has reviewed this and has recommended a condition to secure an intrusive site investigation and associated risk assessment to be completed to fully characterise the nature and extent of any contamination on the site along with any remediation strategy.
208. The Environment Agency has reviewed the proposals in relation to contaminated land and has recommended similar conditions proposed by EPT. This could be set out in a single combined condition.

Air Quality

209. The subject site is located in the Southwark Air Quality Management Area, which is designated for the potential exceedance of the annual mean nitrogen dioxide (NO₂), and daily mean PM₁₀ air quality objectives. Southwark Plan Policy P65 'Improving air quality', states that development should address the impacts of poor air quality on building occupiers and public realm users by reducing exposure to and mitigating the effects of poor air quality.
210. The applicant had submitted an air quality assessment (for a previous iteration, but acceptable) and was reviewed by the Council's EPT. They noted that it did not include a building emissions air quality neutral assessment for this scheme. The applicant had since submitted a technical addendum and EPT are satisfied with the results.
211. During the construction phase, assuming good practice dust control measures are implemented, the residual potential air quality impacts from dust generated by demolition, earthworks, construction and trackout activities was predicted to be not significant. A condition requiring the submission of a demolition and construction management plan (DEMP/CEMP) is therefore recommended to ensure mitigation and control measures are in place.

212. For the operational phase of the development, potential impacts may occur as a result of road traffic exhaust emissions associated with vehicles travelling to and from the site. The assessment indicated that impacts associated with vehicles travelling to and from the site were predicted to be negligible.

Noise and Vibration

213. A Noise and vibration assessment was submitted to identify that the key noise sources impacting upon the development are Ilderton Road to the west and the railway line to the east. Accordingly, appropriate mitigation have been specified in order to reduce these impacts for internal habitable areas. EPT has recommended conditions to manage the internal noise levels for future occupants. The assessment also found that there would be no noise impact for the adjacent commercial operations.

SUSTAINABLE DEVELOPMENT IMPLICATIONS

Energy

214. 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.
215. Policy P70 of the Southwark Plan sets out the borough approach to ensuring that new developments tackle climate change. The approach is generally consistent with London Plan Policies but also requires new commercial developments to meet BREEAM 'Excellent'. The policy also states that residential developments must reduce carbon emissions on site (100% on 2013 Building Regulations). Southwark Council's carbon offset cost is £95 for every tonne of carbon dioxide emitted per year over a period of 30 years. This is the equivalent of £2,850 per tonne of annual residual carbon dioxide emissions.
216. It should be noted that on 15 June 2022, national building regulations were updated to enhance energy performance standards for new buildings through Part L 2021. The Mayor's Energy Assessment Guidance has been updated to explain how London Plan policy should be applied now that these regulations have taken effect. Nevertheless, the software that was scheduled to be released for consultants to carry out the new assessment has not yet been published. As such, this case is based on the 2013 regulations.
217. The applicant has submitted an Energy Statement based on the GLA energy hierarchy. The original submission was reviewed in March 2021 by the GLA and the comments raised by the reviewing party were addressed (including updates to the building energy models) in June 2021. Since June, further amendments to the scheme were made and as such, the applicant was asked to re-consider their approach to energy performance to further improve the CO2 reduction. This details how the targets for carbon dioxide emissions reduction are to be met. A combination of 'Be Lean' 'Be Clean' and 'Be Green' measures have been employed in an attempt to achieve the reduction in line

with the GLA guidance on preparing energy statements, Southwark Plan Policy P70, and the Southwark Sustainable Design and Construction SPD.

Be Lean (use less energy)

218. The Energy Strategy has prioritised a reduction in energy demands at the 'Be Lean' stage by specifying a series of passive and active measures to reduce demand for energy through a high-performance building fabric to improve the insulation and air tightness standards. Building services improvements were also made, including energy efficient lighting, zonal controls and the adoption of more efficient boilers for heating and hot water. The 'Be Lean' measures proposed will result in an estimated reduction in regulated CO₂ emissions of 6.6 tonnes CO₂ per year, which equates to an 13% reduction (for the domestic element) when compared to 'Baseline' emissions rate, using SAP10 carbon intensity factors. For the non-domestic element, there is an estimated reduction in regulated CO₂ emissions of 1.6 tonnes CO₂ per year, which equates to a 32% reduction.

Be Clean (supply energy efficiently)

219. The potential to connect to an existing or proposed decentralised energy network has been evaluated as part of the 'Be Clean' stage of the energy assessment. It is proposed that the development links with the SELCHP district heating network (DHN) to provide all the heat demand for the domestic element, which consists of energy from waste and back up gas fired boilers. The SELCHP network is being extended to Ilderton Road. This presents an excellent opportunity to directly connect with the network and provide the heating and hot water requirements for the development. In the event where the proposed development will be constructed prior to the DHN extension becoming available, a communal system plant supplied by high efficiency gas-fired condensing boilers to supply heating and hot water to the dwellings will be implemented. This system will have the ability to be retrofitted to enable the connection to the wider DHN extension when it becomes available. A condition is recommended to be attached requiring ultra-low NO_x gas boilers to be used if a temporary arrangement is required while waiting for the DHN.
220. The 'Be Clean' measures will result in an estimated reduction in CO₂ emissions of 23.7 tonnes CO₂ per year, equating to a 45% reduction when compared to baseline emissions rate.

Be Green (Low or Carbon Zero Energy)

221. The Be Green assessment has concluded that the most suitable technology for on-site renewable energy generation is Photovoltaics (PV). PV arrays are proposed to be installed on the roof level (90sqm), on top of the pergola. The Be Green technologies are predicted to reduce CO₂ emissions on-site by 3.5 tonnes CO₂ per year for the domestic element (equivalent to 7% reduction). For the non-domestic element, it is predicted to reduce CO₂ emissions on-site by 0.6 tonnes CO₂ per year (equivalent to 11% reduction).

Cumulative Site Savings

222. The overall regulated CO₂ savings on site against a Part L 2013 compliant scheme are therefore 64% for the domestic element and 44% for the non-domestic.
223. The proposed development complies with the London Plan CO₂ savings target of 35% overall. However, it does fall short of Southwark's Local Plan target of 100% emission reduction against Building Regulations.
224. The overall strategy aims to maximise the possible carbon savings achievable on site. The site achieves a high level of fabric efficiency exceeding both the 10% residential and 15% non-residential Be Lean targets. Connection to the local district heat network and the proposal of solar PV on roof areas not being used for amenity space further maximises the carbon savings possible on site.
225. In total, the scheme achieves a 62% emission reduction against a Building Regulations compliant scheme. Achieving beyond this would be difficult to accomplish on site: roof space available for Solar PV has already been maximised for amenity space.
226. In light of the above, contribution towards the Council's carbon offset fund would be required. The applicant has agreed to make the contribution of £62,595 to the carbon offset fund (£54,517 from domestic and £8,078 from non-domestic).

Overheating

227. London Plan Policy SI4 and Policy P68 of the NSP set out the cooling hierarchy that should be followed when developing a cooling strategy for new buildings. The London Plan states that development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.
228. The submitted Overheating Strategy has focused on minimising heat generation within the occupied areas. A dwelling shown to be satisfying the CIBSE TM59 criteria can be described as providing a comfortable internal environment, within sensible limits, for the occupants. The results shows that under the assumed design, as described throughout this report, all of the habitable rooms would satisfy the overheating criteria under the DSY1 2020 weather data, therefore meeting the requirements of the CIBSE TM59.

Whole life cycle and carbon capture

229. London Plan Policy SI2 requires a calculation of whole life cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment (WLCA). This captures a development's unregulated emissions, its embodied emissions and the carbon impact of mid-life maintenance and end- of-life dismantling.
230. A Whole Lifecycle Carbon (WLC) assessment has been undertaken for the proposed development. The GLA raises no objection to the assessment. The estimated whole lifecycle carbon emissions of the proposed development have been provided. A whole life cycle monitoring report has been requested by condition.

Circular economy statement

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

232. A Circular Economy Statement has been submitted and addresses those 9 core principles that the GLA has set out in their Circular Economy Statement Guidance, which includes:

- Minimising the quantities of materials used,
- Minimising the quantities of other resources used,
- Specifying and sourcing materials responsibly and sustainably,
- Design for longevity, adaptability or flexibility and reusability or recoverability,
- Design out construction, demolition, excavation and municipal waste arising,
- Manage demolition waste,
- Manage excavation waste,
- Manage construction waste, and
- Manage municipal waste.

233. A planning condition requiring a Circular Economy Statement to be agreed in writing by the Council prior to commencement of any works on site is recommended. Additionally, a special condition is to be imposed on the decision notice that requires a post completion circular economy report no later than three months following substantial completion of the final residential unit. This report will set out the predicted and actual performance against all numerical targets in the relevant Planning Stage Circular Economy Statement.

BREEAM

234. Southwark Plan Policy P69 requires developments to achieve a BREEAM rating of 'Excellent' for non-residential development over 500sqm. Whilst this scheme proposes less than 500sqm, a BREEAM pre-assessment report for the commercial aspect of the development has been submitted. The commercial aspect of the scheme demonstrates that the development could achieve the required excellent rating.

235. A planning condition is recommended to secure an independently verified BREEAM report demonstrating that these target ratings would be achieved through the detailed and technical design stages

Digital connectivity infrastructure

236. 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.

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

PLANNING OBLIGATIONS (Section 106 Undertaking or Agreement)

238. 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

239. Following the adoption of Southwark's Community Infrastructure Levy (SCIL) on 1 April 2015, much of the historical toolkit obligations such as Education and Strategic Transport have been replaced by SCIL. Only defined site specific mitigation that meets the tests in Regulation 122 can be given weight.

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

Table: Section 106 Financial Obligations

Planning obligation	Mitigation	Applicant's position
Local Economy and Workspace		
Affordable workspace	10% affordable workspace - £12 per square foot inclusive of service charge for 30 years. To be calculated on the GIA. Inclusive of insurance and VAT.	Agreed
Local Employment	Employment during construction <ul style="list-style-type: none"> • 10 sustained jobs for previously unemployed Southwark residents (or a 	Agreed

	<p>maximum offset of £43,000)</p> <ul style="list-style-type: none"> • 10 short courses (or a maximum offset of £1,500), and • 26 apprenticeships (or a maximum offset of £39,000) • An employment, skills and business support plan. 	
Housing and Viability		
Affordable housing	<ul style="list-style-type: none"> • Secure 16 residential units as affordable housing • This equates to 35.5% by habitable room • To make the affordable units available before 50% of the private units can be occupied • Early-stage viability review 	Agreed
Affordable housing monitoring	<ul style="list-style-type: none"> • £2,117.60 (a charge of £132.35 per affordable unit) 	Agreed
Wheelchair Units	6 Wheelchair units (2 x social rented, 4 x private)	Agreed
Transport and Highways		
Construction Management	<ul style="list-style-type: none"> • A detailed Demolition and Construction Management Plan (CMP) and a £40 per unit (£2,360) contribution for Construction Management within the OKR AAP area. This is for the council to manage cumulative impacts on the highways and environment. 	Agreed
Southwark Highways	<ul style="list-style-type: none"> • Renew and upgrade the kerb and footway adjacent to their development to the appropriate materials as specified in our regulating plan and materials palette. • Repave the footways including new kerbing fronting the development on Ilderton Road and Hornshay Street using materials in accordance with Southwark's Streetscape Design Manual (SSDM). 	Agreed

	<ul style="list-style-type: none"> • Reconstruct all redundant vehicular entrances fronting the development on Ilderton Road in accordance with the SSDM standards. • Remove the existing speed hump on Hornshay Street and resurface carriageway in accordance with SSDM standards. • Construct a new vehicular crossover at the entrance to the service yard in accordance with SSDM standards. Note that the Council's proposals for the Cycleway scheme may require additional measures to ensure the safety of all road users at this point. This aspect will depend on the timing of construction of both projects and should be discussed further during the drafting of the S278 Agreement. • Provide access arrangements such as a dropped kerb construction to accommodate refuse collection on Ilderton Road. • Promote all necessary Traffic Regulation Orders to install waiting and loading restrictions. • Upgrade street lighting to current LBS standards. • Refresh road markings following kerb installation. • Rectify any damaged footways, kerbs, inspection covers and street furniture due to the construction of the development. 	
TfL Obligations	<p>TfL requested financial obligations</p> <ul style="list-style-type: none"> • Bus contribution of £159,300 (based on £2,700 per home) • Cycle hire docking station £2,950 (based on £50 per home) 	Agreed
Parking permit	This development would be excluded from	Agreed

restriction	those eligible for car parking permits under any future CPZ operating in this locality.	
Car club membership	Three year membership to new residents to car clubs operating in the area.	Agreed
Delivery and Service Plan	DSP To be monitored against baseline figures for all daily servicing and delivery trips. Delivery and service plan monitoring of £5,900.	Agreed
Energy, Sustainability and the Environment		
Futureproofing for connection to District Heat Network (DHN)	Prior to occupation, a CHP Energy Strategy must be approved setting out how the development will be designed and built so that it will be capable of connecting to the District CHP in the future.	Agreed
Carbon	<ul style="list-style-type: none"> • An off-set payment of £54,517 (domestic) • An off-set payment of £8,078 (non-domestic) • Review and re-calculation of on-site savings following detailed design stage • Be Seen Monitoring 	Agreed
Archaeology monitoring/ supervision fund	£6,778 towards Archaeological monitoring	Agreed
Tree contribution	£9,000 (£3,000 per tree)	Agreed
Greenfield Runoff rates	£366 per cubic metre in the event that greenfield run off rates are not met on site.	Agreed
Open space		
Communal amenity space shortfall	£1,025 (£205 per sqm shortfall)	Agreed
Public open space	£60,475 (£205 per sqm shortfall)	Agreed
Other obligations		
Architects	Securing TDO to deliver the building detailed	Agreed

	design, unless otherwise agreed in writing	
Other	<ul style="list-style-type: none"> • Equal tenure access to the children’s and communal play areas • London living wage – best endeavours 	Agreed
Administration fee	Maximum contribution to cover the costs of monitoring these necessary planning obligations, calculated as 2% of total sum	Agreed
Total	£393,050.60	

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

242. In the event that a satisfactory legal agreement has not been entered into by 28th February 2023, it is recommended that the Director of Planning refuses planning permission, if appropriate, for the following reason:

243. “In the absence of a completed Unilateral Undertaking there is no mechanism in place to mitigation against the adverse impacts of the development through contributions and it would therefore be contrary to Southwark Plan policy IP3 (‘Community Infrastructure Levy (CIL) and Section 106 Planning Obligations’), Policy DF 1 Planning Obligations of the London Plan (2021) and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015)”.

Mayoral and Southwark Community Infrastructure Levy (CIL)

244. 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 support growth in Southwark.

245. The site is located within Southwark CIL Zone 2 and MCIL2 Band 2 Zone. Based on the floor areas provided in the agent’s CIL Form1 (GIA Info) dated 06-Aug-21, the gross amount of CIL is approximately **£1,438,278.54** consisting £301,988.62 of Mayoral CIL and £1,136,289.92 of Borough CIL. Subjecting to the correct CIL forms being submitted on time, up to £449.9k of CIL Social Housing Relief can be claimed for qualifying affordable housing element. Net of CIL relief, the chargeable amount for this development is expected to be around **£988,411.85**. It should be noted that this is an estimate, and the floor areas will be checked when related CIL Assumption of Liability Form and Relief Claim Form are submitted after planning approval has been obtained.

OTHER MATTERS

246. None.

COMMUNITY INVOLVEMENT AND ENGAGEMENT

247. Southwark's Draft Statement of Community Involvement and Development Consultation Charter encourages consultation with local communities, especially developers seeking permission for 'Major/Large Scale' developments. The Charter is a guide setting out the consultation requirements to be carried out by developers for proposed development.

248. A Statement of Community Involvement (SCI) has been submitted detailing the process of community engagement undertaken by the applicant. Public consultation for the proposed development was undertaken through a leaflet drop in January 2021 and provided a summary of the proposal and directed recipients to a website (www.ildertonroad.co.uk), which was launched on 11 January 2021. The website provided a greater background to the proposals and a link to the Design and Access Statement submitted with the application. The website also offered an opportunity to provide comments directly through a comments section of the page, or by email directly to the Applicant. No comments have been received either through the website or by email.

249. A meeting with the ward councillors was held on 15 February 2021. Following an online presentation, a number of points were discussed including commercial re-provision, playspace location and affordable housing provision. The applicant had gone away to make the necessary amendments.

250. The applicant also tried to set up a resident group meeting with the Tustin Community Association. An email was sent to the chair of the TCA providing a background to the application and forwarding the Design & Access Statement. However, the applicant received no response.

Human rights implications

251. 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.

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

CONCLUSION ON PLANNING ISSUES

253. The development would potentially increase the numbers of jobs on the site and deliver new housing, including a policy compliant level of affordable housing in terms of habitable rooms. Affordable workspace has also been proposed. Recognising the

changing character and uses carried out in the immediate area, it is not felt that any harm to existing businesses would arise by the introduction of housing. In light of this, it is considered that the principle of the proposed development should be supported in this instance.

254. The proposal would deliver a good standard of accommodation and would address the majority of standards as set out in the residential design standards. Each flat would have its own private balcony and there is only a very marginal shortfall in communal amenity space. Playspace is provided on the roof and is accessible to all tenures. Whilst the overall mix of units does not strictly comply with the Southwark Plan policy, the affordable housing mix is much improved to the policy position, with 62.5% having two or more bedrooms and 50% having three bedrooms.
255. The potential impacts identified are not considered to be significant to adversely impact on neighbouring residents. The existing residents would have adequate outlook, privacy and access to daylight and sunlight.
256. The building height proposed would represent a step change in the existing scale of the area, but as an Opportunity Area site, it is considered that the height proposed would be in accordance with the objectives of the London Plan in that it would optimise the development potential of the site without harming the character of the surrounding area. It is also considered that the proposed height at 301-303 Ilderton Road would be compatible with the emerging townscape and heights of buildings. The design and materiality is considered to respond well to the existing character and surrounding context.
257. The proposal would provide cycle parking on site and upgrade the public realm, which would improve the pedestrian experience along this part of Ilderton Road.
258. The proposed landscaping on the roof and green trellis on the ground floor results in an increased UGF score 0.27 and whilst this falls below the target of 0.4 stipulated in the London Plan, it is still a target. Additionally, this is a scheme that previously had consent (for 46 units) and this is a material consideration. Furthermore, biodiversity proposals would result in a net gain.
259. The scheme would achieve 64% carbon emission reduction site-wide against a Building Regulations compliant scheme, which is positive when compared with the extant scheme.
260. Subject to the proposed conditions and planning obligations, the proposal is considered to comply with the development plan policies and it is on this basis that it is recommended that planning permission be granted.

Consultation responses from external and statutory consultees

261. This application was subject to two rounds of statutory consultation. The first round was for a total of 54 units at 12 storeys and took place 1 March 2021. The second round was for the amended scheme proposing 59 units at 15 storeys wet out in September 2021.

262. Greater London Authority (GLA) had made the following comments based on the 54 unit scheme. They did not provide revised comments at Stage 1. The GLA confirmed that any comments would be provided with the Stage II report. As such, some of the initial comments provided below would be irrelevant to this current scheme, as it has since been revised. Below are the key issues.

- Residential-led mixed-use development is acceptable in principle subject to an acceptable affordable housing offer and quantum of industrial uses within the SIL. This floorspace should be restricted to industrial uses that can co-exist successfully with residential development.
- Not supportive of the original affordable housing offer. Any planning permission will be expected to be subject to an early and late stage review mechanism.
- The overall layout and density is broadly supported and makes most efficient use of site area and limited access routes. The development would provide active frontage along the principal elevation of Ilderton Road and some activity on the Hornshay Street frontage.
- No specific height is referenced for this site however, it is important to note the existing and emerging context, the extant 12 storey consent on the site, the recent approval at 313-349 Ilderton Road site to the south up to 15 storeys tall and the tall buildings at the nearby Tustin Estate at circa 19 storeys.
- Additional information is also required to assess compliance London Plan Policy D9 relating to the visual, functional and environmental impacts.
- The use of brick is welcomed, as it is consistent with the material evident on the nearby buildings, and as such responds positively to its setting. The vertical emphasis is considered acceptable, as is the introduction of the arches at first floor level, which adds visual interest to the façade and relates well to the rail and industrial heritage of the area.
- It is acknowledged the current site provides little to overall public realm and the proposed scheme will be of benefit to the general improvement in character of the locality. Opportunities for street enhancements should be explored.
- The proposals will not negatively impact this strategic view as set out in the London View Management Framework.
- Further information is needed on mitigation measures for residential use and agents of change principles.
- The applicant must provide a fire statement and a TVIA so that officers can assess any potential harm to heritage assets.
- The proposed cycle parking does not meet the London Cycling Design Standards, as required by Policy T5, and this should be resolved.
- To support cycling by new building occupiers and as part of a network for the whole Opportunity Area, a proportionate contribution towards the Mayor's cycle hire scheme is sought.
- Further consideration must be given to resolving this issue through either set back of the development and/or a s106/s278 obligation to enable delivery of the cycle route scheme in line with Policy T4.
- Further work is required to fully assess the demand for vehicles servicing the site and the locations in which this should be undertaken, with revisions to the Delivery and Servicing Plan. The draft Construction Logistics Plan also needs revision.
- The Flood Risk Assessment (FRA) does not give appropriate regard residual risks from breach tidal flooding and reservoir flooding.

- The surface water drainage strategy for the proposed development does not comply with The London Plan 2021 Policy SI.13, as it does not give appropriate regard to the greenfield runoff rate and above ground green Sustainable Drainage Systems (SuDS), including rainwater harvesting. More detailed hydraulic calculations need to be provided, as well as an assessment of exceedance flood flow routes above the 100 year event plus 40% climate change, and a maintenance plan for the proposed SuDS.
- Comments on various energy related matter such as WLC and CES have been made.

Officer comment: Most of the comments above have been discussed in the main body of the report. The applicant had also addressed the majority of these (including those not listed above). The scheme has evolved and therefore some of the comments are not relevant to this case. The applicant has submitted the various supporting documents required by the GLA and has improved the cycle parking provision. Given that the affordable housing offer has changed, it is a fast track application under the London Plan and therefore only an early stage review is required. Conditions for cycle parking, and conditions regarding WLC, CES and Energy have been secured by condition.

263. Transport for London have made the following comments:

- There is potential for footway widening to be reconsidered. Any footway widening may provide options to allow servicing and disabled residents' parking on the Ilderton Road frontage, as well as tree planting and installation of visitor cycle parking. A proposal for footway widening would be welcomed, but must be carefully designed to maximise benefits for the development and the general public whilst ensuring impacts on highway users, notably cyclists and buses are acceptable, rather than re-presentation of the inadequate proposal from the previous application.
- It is not clear how reliance on servicing in Hornshay Street will work alongside the cycle scheme and the demands from pedestrians.
- Recommend that the Council secures an appropriate level of funding toward addressing the problems identified through the Section 106 (or, for locations very close to the site, Section 278) agreements. This should include necessary improvements to the section of Hornshay Street beyond the railway line and elsewhere in Lewisham to connect the site with the nearest park (Bridgehouse Meadows), local facilities, and the proposed Surrey Canal London Overground station which, if delivered, would improve public transport options and may increase PTAL to 3.
- Wayfinding in the form of a commensurate contribution to Legible London signage is also justified.
- Long-stay cycle parking for residents is proposed using only two-tier racks. London Plan policy T5 requires compliance with the London Cycling Design Standards (LCDS). A minimum of 5% of all provision should be suitable for wider/larger cycles, such as those typically used by disabled riders as well as cargo cycles and cycle trailers.
- The Active Travel Zone assessment specifically excludes cycling routes, which is not acceptable. We recommend that a supplementary assessment is

undertaken on those routes from the point-of-view of cyclists and, again, funding should be secured for improvements.

- It is reasonable for this developer to fund, or at least make a significant contribution towards, the implementation of the cycle scheme under design development, with improvements delivered through a Section 278 agreement. In addition, funding for two years' free cycle hire use should be secured.
- The proposal for a car-free development is welcomed in the context of, and provided that, necessary improvements to public transport and active travel in the area are secured for and through this development.
- This must also be supported by the introduction of parking controls (CPZ).
- There may be opportunities for on-street disabled persons' parking on the site frontages on Ilderton Road and Hornshay Street, and with agreement with Lewisham there may also be opportunities to provide some spaces further east in Hornshay Street.
- In line with an agreed assessment, a contribution of £2700 per residential unit indexed to March 2019 will be required, to be paid in one instalment on occupation.

Officer response: The comments from TfL are noted.

In regards to the suggestion that contributions be sought for improvements to Hornshay Street beyond the railway line and elsewhere in Lewisham, it should be noted that the approved scheme was agreed with no transport S106 other than TfL requirements as infrastructure is covered under CIL. The other s278 works would be secured as requested by the Council's own Highways Authority.

It is not considered that how this scheme justifies contributing towards Legible London signage here. Conditions relating to cycle parking and delivery and servicing plans have been secured in the decision notice attached. Comments relating to footway widening is not considered to be justified given that the site is already very narrow and oddly shaped.

London Borough of Lewisham has made the following comments:

- Hornshay Street is a borough boundary road maintained by London Borough of Lewisham from the western edge of railway bridge to its eastern end.
- Hornshay Street is not located within a Controlled Parking Zone (CPZ), and without mitigation, the proposed development will result in overspill parking. Overspill parking generated by the proposed development would have a significant impact on on-street parking capacity, particularly within the London Borough of Lewisham.
- The submitted Transport Assessment has not undertaken any assessment of existing on-street parking capacity or proposed any mitigation to minimise the impact of the proposal. To mitigate this impact, it is advised that a contribution is required towards implementing parking controls on Hornshay Street be secured through a S106 obligation.
- It is proposed that all Delivery and servicing activity would occur on Hornshay Street adjacent to the site. However, the swept path analysis submitted with the application only illustrates the vehicle manoeuvring within the section of

Hornshay Street within the London Borough of Southwark, but does not consider or identify a safe location for the service vehicle to undertake the turning manoeuvres required for the vehicles to access / egress Hornshay Street in forward gear. Hornshay Street is a cul-de-sac, and without adequate turning facilities, servicing vehicles would be undertaking reversing turning manoeuvres in locations that could result in conflict with other road users, and could have Highway safety implications. For these reasons, the proposed Delivery and Servicing strategy for the site is objectionable.

- Waiting restrictions may be required on the section of Hornshay Street that is within the London Borough of Lewisham to enable service vehicles to access / egress Hornshay Street in forward gear. The impact on the public highway within the London Borough of Lewisham has not been assessed.
- The application fails to consider the proposed cycling infrastructure works / measures proposed by the New Bermondsey planning application (within the London Borough of Lewisham). The cycle infrastructure works will result in an increase in cycle movements on Hornshay Street.
- The applicant should contribute towards enhancements to the existing walking and cycling infrastructure on Hornshay Street to support the new trips generated by the development.
- The future occupiers of the development at Ilderton Road would use the section of Hornshay Street within the London Borough of Lewisham to access the new overground station and public transport interchange. So, the contribution towards enhancement on Hornshay Street are considered necessary.
- The construction phase of the development will also have an impact on the section of Hornshay Street within the London Borough of Lewisham. There will also be a cumulative impact associated with the construction phases of the New Bermondsey development. There should be a planning condition requiring the London Borough of Lewisham to be consulted on the details of the Construction Strategy at the site.

Officer response: Officers have discussed the above with the applicant and the Council's own Transport and Highways team. The applicant has made amendments since those comments from LB Lewisham. The design of the service yard incorporates gates, which are set back 6.0m from the back of the nearside footway on Hornshay Street. This means that vehicles do not need to continue along the eastern part of Hornshay Street (Lewisham side). Refuse collection would be from Ilderton Road. In order to assess the safe operation of the proposed service yard access in conjunction with the Council's cycleway proposals, the applicant commissioned a Stage 1 RSA at the site. The applicant would implement any relevant recommendations of that audit and subsequent audits. As mentioned previously, requests for infrastructure works outside of the borough would be covered by CIL.

264. Metropolitan Police: Comments made.

Comments made back in 2018 are still valid. It is requested that the Secured by Design condition is retained and extended to encompass the additional 3 floors of residential units and rooftop play/ social space in line with this new proposal. The Designing Out Crime Unit are fully supportive of this development and request for the developers/ architects to make contact in order to pursue the Secured by Design requirements

competently.

Officer response: The requested condition has been included on the draft decision notice and it is expected that the design measures requested by the Secured by Design officer would be submitted as part of the condition discharge.

265. Network Rail: Comments made.

A number of Asset Protection Informatives for works in close proximity to Network Rail's infrastructure were listed to maintain the safe operation of the railway and protect Network Rail's infrastructure. Network Rail wish to be involved in the approval of any landscaping scheme adjacent to the railway.

Officer comment: The above is noted and an informative would be included in the decision notice.

266. London Fire Brigade: No further observations.

The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (The Order) in London.

The London Fire Brigade (LFB) has been consulted with regard to the above-mentioned premises and have no further observations to make. It should be ensured that if any material amendments to this consultation is proposed, a further consultation may be required.

Officer comment: Noted

267. Environment Agency: Comments made.

No objection to the planning application subject to conditions (on contamination) being imposed on any planning permission granted. The document 'Desk Study Report' by Ground & Water (reference GWPR2710/DS/July 2018 V1.01 has indicated the potential for ground contamination to be present and has recommended an intrusive investigation to assess this. The development will be at low risk of flooding. The inclusion of inappropriate development according to Table 3 of the national Planning Practice Guidance, the absence of a Flood Risk Assessment (FRA) or the submission of an inadequate FRA could technically be reasons for refusal of the scheme. However, the EA are taking a pragmatic approach and do not object to this application. The advice is based upon the tidal and/or fluvial flood risk to the site. Other sources of flooding to the site, such as surface water, also need to be considered.

Officer comment: Noted. The conditions recommended by the EA are similar to the one proposed by the EPT officer. It is considered appropriate to use the EPT's recommended wording, which amalgamates the conditions.

268. Thames Water: Comments made.

The proposed development is located within 15m of a strategic sewer and water main and has recommended a condition on piling.

With regard to surface water drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water there would be no objection. With regard to waste water network and sewage treatment works infrastructure capacity there is no objection.

Informatives have been recommended.

Officer response: Noted.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

269.N/A

REASONS FOR LATENESS

270.N/A

REASONS FOR URGENCY

271.N/A

BACKGROUND INFORMATION

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 5729 Council website: www.southwark.gov.uk

APPENDICES

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

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth	
Report Author	Wing Lau, Team Leader	
Version	Final	
Dated	30 September 2022	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
Date final report sent to Constitutional Team		5 October 2022

APPENDIX 1: RECOMMENDATION

Applicant SOUTHWARK COUNCIL
Application Type Full Planning Application

Recommendation Grant subject to s106 agreement

Case Number 20/AP/3560

Draft of Decision Notice

Planning Permission was GRANTED for the following development:

At: 301-303 ILBERTON ROAD, LONDON, SE15 1NW

In accordance with application received on 02/12/2020

- 1 The development hereby permitted shall not be carried out otherwise than in accordance with the following approved plans:
 - 1880(00)210_Proposed Ground Floor Plan-PL11
 - 1880(00)211_Proposed First Floor Plan-PL7
 - 1880(00)212_Proposed 2nd-3rd Floor Plan-PL7
 - 1880(00)214_Proposed 4th-7th Floor Plan-PL6
 - 1880(00)218_Proposed 8th-14th Floor Plan-PL8
 - 1880(00)225_Proposed Fifteenth Floor Plan-PL8
 - 1880(00)226_Proposed Roof Plan-PL8
 - 1880(00)230_Proposed West Elevation-PL9
 - 1880(00)231_Proposed North Elevation-PL9
 - 1880(00)232_Proposed East Elevation-PL11
 - 1880(00)240_Proposed Section AA-PL6
 - 1880(00)241_Proposed Section BB-PL6
 - 1880(D)001_Proposed Bay Detail-01
 - 1880(D)002_Proposed Bay Detail-02
 - 1880(D)003_Proposed Bay Detail-03

Permission is subject to the following Time Limits:

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

Reason:

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

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

3 CEMP

No development shall take place, including any works of demolition, until a written CEMP has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall oblige the applicant, developer and contractors to commit to current best practice with regard to construction site management and to use all best endeavours to minimise off-site impacts, and will include the following information:

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

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

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

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

Reason

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

4 Archaeological Evaluation

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

Reason:

In order that the applicants supply the necessary archaeological information to ensure suitable mitigation measures and/or foundation design proposals be presented in accordance with

Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2021.

5 Archaeological Mitigation

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

Reason:

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

6 Site Contamination

a) Prior to the commencement of development works other than demolition, an intrusive site investigation and associated risk assessment shall be completed to fully characterise the nature and extent of any soil vapours or soil gas contamination on the site, as recommended in the phase 1 site investigation by Ground & Water, reference GWPR2710/DS, July 2018.

b) In the event that contamination is found that presents a risk to future users or the wider environment, a detailed remediation and/or mitigation strategy shall be prepared and submitted to the Local Planning Authority for approval in writing. The strategy shall detail all proposed actions to be taken to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property. The approved remediation/mitigation strategy shall be implemented as part of the development.

c) Following the completion of the works and measures identified in the approved remediation strategy, a verification report shall be submitted to and approved in writing by the Local Planning Authority providing evidence that all works required by the remediation strategy have been completed and that the site is suitable and safe for the developed uses and in respect of the wider environment.

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

Reason:

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P64 (Contaminated land and hazardous substances), and the National Planning Policy Framework 2021.

7 Detailed Drainage Design

No works (excluding demolition and site clearance) shall commence until full details of the proposed surface water drainage system incorporating Sustainable Drainage Systems (SuDS) have been submitted to and approved in writing by the Local Planning Authority, including detailed design, size and location of attenuation units and details of flow control measures. The strategy should achieve a reduction in surface water runoff rates during the 1% Annual Exceedance Probability (AEP) event plus climate change allowance, as detailed in the Flood Risk Assessment and Indicative Surface Water Drainage Strategy prepared by RSK LDE (report ref. 133334-R1(1)-FRA, dated August 2018) and subsequent accompanying information. The applicant must demonstrate that the site is safe in the event of blockage/failure of the system, including consideration of exceedance flows.

Reason:

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

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

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

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

Reason:

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

9 Hard and Soft Landscaping

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

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

Reason:

So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2021, policy D4 ('Delivering good design') of the London Plan 2021 and policies P13 ('Design of places'), P14 ('Design quality') and P59 ('Green infrastructure') of the Southwark Plan 2022.

10 Biodiverse Green Roofs

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

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

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

Full Discharge of this condition will be granted for each phase once the green/brown roof(s) for that phase are completed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the roof has been constructed to the agreed specification.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with: Policies SI 4 (Managing heat risk), SI 13 (Sustainable drainage), G1 (Green Infrastructure), G5 (Urban Greening) of the

London Plan 2021; Policy P59 (Green Infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

11 Landscape Management Plan

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

Reason:

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

12 Swift Bricks/Bat Bricks

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

No less than 12 swift bricks and 6 bat bricks shall be provided and the details shall include the exact location, specification and design of the habitats. The bricks shall be installed within the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained. The nesting bricks shall be installed strictly in accordance with the details so approved, shall be maintained as such thereafter.

Discharge of this condition will be granted on receiving the details of the nest/roost features and mapped locations and Southwark Council agreeing to the submitted plans, and once the nest/roost features are installed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the features have been installed to the agreed specification.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with Chapter 15 (Conserving and enhancing the natural environment) of the National Planning Policy Framework (2021); Policy G6 (Biodiversity and access to nature) of the London Plan (2021); P56 Protection of amenity, P57 Open space, P58 Open Water space, P59 Green infrastructure, P60 Bioiversity, P66 Reducing noise pollution and enhancing soundscapes and P69 Sustainable standards of the Southwark Plan (2022).

13 Materials Schedule and On-Site Presentation of Samples

Before any façade works of development hereby authorised begins:

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

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

Reason:

In order that the Local Planning Authority may be satisfied that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing, are suitable in context and consistent with the consented scheme in accordance with: the National Planning Policy Framework 2021, policies P13 ('Design of places') and P14 ('Design quality') of the Southwark Plan 2022 and policy D4 ('Delivering good design') of the London Plan 2021.

14 Wheelchair housing

Prior to the commencement of works above grade, the developer shall submit written confirmation from the appointed building control body that the specifications for each dwelling identified in the detailed construction plans for that phase meet the standard of the Approved Document M of the Building Regulations (2015) required in the schedule below and as corresponding to the approved floor plans. The development shall be carried out in accordance with the details thereby approved by the appointed building control body.

M4 (Category 2) 'accessible and adaptable':- up to 90%

M4 (Category 3(a) 'accessible and adaptable':- 4 units

M4 (Category 3(b) 'wheelchair user dwellings'.- 2 units

Reason:

In order to ensure the development complies with P8 Wheelchair accessible and adaptable housing of the Southwark Plan and D7 of the London Plan 2021.

15 Digital Connectivity

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

within that phase of development. The development shall be carried out in accordance with these plans and maintained as such in perpetuity.

Reason:

To comply with SI 6 of the London Plan 2021.

16 Lifts

Prior to commencement of works above grade of development hereby approved, detailed drawings shall be submitted to demonstrate that a suitably-sized evacuation lift (in addition to a firefighting lift) can and will be provided in each residential core within that phase of development. Once approved, the development shall be constructed in accordance with the approved drawings and maintained for as long as the development is occupied.

Reason:

In order to comply with London Plan 2021 Policy D5 Inclusive Design.

17 Secure By Design

Before any above grade work hereby authorised begins, details of security measures shall be submitted and approved in writing by the Local Planning Authority and any such security measures shall be implemented prior to occupation in accordance with the approved details which shall seek to achieve the 'Secured by Design' accreditation award from the Metropolitan Police.

Reason:

In pursuance of the Local Planning Authority's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention, in accordance with: the National Planning Policy Framework 2021 and Southwark Plan 2022 policy P16 ('Designing out crime').

18 Cycle store

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

Reason:

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

19 BREEAM

(a) Before any fit out works to the Class E units hereby authorised begins, an independently verified BREEAM Design Stage report (detailing performance in each category, overall score, BREEAM rating and a BREEAM certificate of building performance) to achieve a minimum 'excellent' rating (unless otherwise agreed by the local planning authority) shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any such approval given;

(b) Within 6 months of the first occupation of the building hereby permitted, a certified Post Construction Review (or other verification process agreed with the local planning authority) shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed standards at (a) have been met.

Reason:

To ensure the proposal complies with The National Planning Policy Framework 2021, Southwark Plan 2022 policy P69 ('Sustainability standards') and policy SI2 ('Minimising greenhouse gas emissions') of the London Plan 2021.

Pre-occupation condition(s) - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before the building(s) hereby permitted are occupied or the use hereby permitted is commenced.

20 Car Free Marketing

Prior to occupation of any part of the development, details of the marketing materials for sale and rental properties shall be submitted and approved in writing by the local planning authority clearly identifying the development as predominantly car free (excluding the permitted designated wheelchair parking spaces) and that new residents not requiring the permitted spaces should sign acknowledgement of the permit free status of their new home.

Reason:

To ensure compliance with P54 of the Southwark Plan 2022.

21 Circular Economy Post Completion Report

Prior to occupation of the development, a Post Completion Report setting out the predicted and actual performance against all numerical targets in the relevant Circular Economy Statement for that phase shall be submitted to the GLA at: CircularEconomyLPG@london.gov.uk, along with any supporting evidence as per the GLA's Circular Economy Statement Guidance.

Reason:

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

22 Whole Life Cycle

Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the building being occupied (or handed over to a new owner, if applicable), the legal owner(s) of the development should submit the post-construction Whole Life-Cycle Carbon (WLC) Assessment for that phase to the GLA at: ZeroCarbonPlanning@london.gov.uk.

The owner should use the post construction tab of the GLA's WLC assessment template and this should be completed accurately and in its entirety, in line with the criteria set out in the GLA's WLC Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed.

Reason:

To ensure whole life-cycle carbon is calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan 2021.

23 External Lighting

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

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

Reason:

In order that the Council may be satisfied as to the details of the development in the interest of the visual amenity of the area, the amenity and privacy of adjoining occupiers, and their protection from light nuisance, in accordance with The National Planning Policy Framework 2021, London Plan policy G6 ('Biodiversity and access to nature') and Southwark Plan 2022 policies P56 ('Protection of amenity') and P60 ('Biodiversity').

24 Internal Noise Levels

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

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

Living rooms- 35dB LAeq T †

Dining room - 40 dB LAeq T †

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

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

This may be achieved by following the recommendations for mitigation contained in chapter 5 of the Noise Assessment Report by REC, reference AC105922-1R1, August 2018.

Following completion of the development and prior to occupation, a validation test shall be carried out on a relevant sample of premises. The results shall be submitted to the LPA for approval in writing. The approved scheme shall be implemented and permanently maintained thereafter.

Reason:

To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2021.

25 Vertical Sound Transmission

The party floor/ceilings between the commercial premises and residential dwellings shall be designed to achieve a minimum weighted standardized level difference of 60dB DnTw+Ctr. Pre-occupation testing of the separating partition shall be undertaken for airborne sound insulation in accordance with the methodology of ISO 16283-1:2014. Details of the specification of the partition together with full results of the sound transmission testing shall be submitted to the Local Planning Authority for written approval prior to the use commencing and once approved the partition shall be permanently maintained thereafter.

Reason:

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities within the commercial premises in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2021.

26 Plant Noise

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

A validation test shall be carried out prior to occupation 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 the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2021.

27 Urban Greening Certification

a) Prior to first occupation of each phase of the development hereby consented, an interim report/letter (together with any supporting evidence) from a suitably qualified landscape specialist shall be submitted to and approved in writing by the LPA. The report/letter shall confirm that sufficient progress has been made in terms of detailed design, procurement and construction to be reasonably well assured that the development hereby approved will, once completed, achieve or exceed the agreed UGF score of 0.27.

b) Within six months of first occupation of the development hereby permitted, a post construction certificate prepared by a suitably qualified landscape specialist (or other verification process agreed with the LPA) shall be submitted to and approved in writing by the LPA, confirming that the agreed UGF score of 0.27 has been met.

Reason:

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

28 Refuse Storage Facilities

Before the first occupation of any part of the development hereby approved, the refuse storage arrangements shown on the approved drawings shall be provided and made available for use by the occupiers. The refuse storage facilities shall thereafter be retained and the space used for no other purpose.

Reason:

To ensure that the refuse will be appropriately stored within the site thereby protecting the amenity of the site and the area in general from litter, odour and potential vermin/pest nuisance

in accordance with: the National Planning Policy Framework 2021 and policies P56 ('Protection of amenity') and P62 ('Reducing waste') of the Southwark Plan 2022.

29 Drainage Verification Report

No dwelling shall be occupied until a drainage verification report prepared by a suitably qualified engineer has been submitted to and approved in writing by the Local Planning Authority. The report shall provide evidence that the drainage system (incorporating SuDS) has been constructed according to the approved details and specifications (or detail any minor variations where relevant) as detailed in the Flood Risk Assessment and Indicative Surface Water Drainage Strategy prepared by RSK LDE (report ref. 133334-R1(1)-FRA, dated August 2018) and subsequent accompanying information, and shall include plans, photographs and national grid references of key components of the drainage network such as surface water attenuation structures, flow control devices and outfalls. The report shall also include details of the responsible management company.

Reason:

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

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.

30 Air Quality

The development shall achieve full compliance with the air quality assessment mitigation measures as detailed in Air Quality Assessment produced by REC dated August 2018 and the Air Quality Technical Addendum.

Reason:

To protect future occupiers from poor external air quality in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P65 (Improving air quality), and the National Planning Policy Framework 2021.

31 Servicing Hours

Any deliveries or collections to the development shall only be between the following hours:

06:00 - 22:00 Monday to Saturday; and

10:00 - 18:00 on Sundays and Bank Holidays.

Reason:

To ensure that the occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance, and to reduce vehicle movements on the local road network during peak times, in accordance with: the National Planning Policy Framework 2021; Policy T7 ('Deliveries, Servicing and Construction') of the London Plan 2021 and policy P50 ('Highways Impacts') of the Southwark Plan 2022.

32 Hours of Use

The opening hours of the non-residential uses shall be limited to 07:00 – 23:00 daily.

Reason:

To safeguard the amenity of neighbouring residential properties in accordance with The National Planning Policy Framework 2021 and Southwark Plan 2022 policy P56 ('Protection of amenity').

33 Fire Safety Strategy

The development hereby consented shall not be carried out other than in accordance with the approved Fire Statement Issue 4 dated 21/04/2022.

Reason:

To minimise the risk to life and minimise building damage in the event of a fire, in accordance with: the National Planning Policy Framework 2021, and; Policy D12 ('Fire safety') of the London Plan 2021.

34 Energy Efficiency

The development hereby permitted shall be constructed in accordance with the approved Energy Statement Version 2 dated September 2020 and Addendum Version 2.0 by Alphacello. All measures and technologies shall remain for as long as the development is occupied, unless as otherwise agreed in writing.

Reason:

To ensure the development complies with the National Planning Policy Framework 2021 and Policy S1 2 of the London Plan 2021.

35 Roof Plant and Other Roof Structures

No roof plant, equipment or other structures, other than as shown on the drawings hereby approved or discharged under an 'approval of details' application pursuant to this Decision Notice, shall be placed on the roof or be permitted to project above the roofline of any part of the building as shown on elevational drawings or shall be permitted to extend outside of the roof plant enclosures of any building hereby permitted.

Reason:

In order to ensure that no additional plant is placed on the roof of the building in the interest of the appearance and design of the building and the visual amenity of the area, in accordance with: the National Planning Policy Framework 2021, Southwark Plan 2022 policies P13 ('Design of places') and P14 ('Design quality') of the Southwark Plan 2022 and policy D4 ('Delivering good design') of the London Plan 2021.

36 Restriction of Instatement of Appurtenances

With the exception of rainwater pipes, no meter boxes, flues, vents or pipes other than as shown on the drawings hereby approved or discharged under an 'approval of details' application pursuant to this permission, shall be fixed or installed on the elevations of the building, unless otherwise approved by the LPA.

Reason:

To ensure such works do not detract from the appearance of the building in accordance with: The National Planning Policy Framework 2021, Southwark Plan 2022 policies P13 ('Design of places') and P14 ('Design quality') of the Southwark Plan 2022 and policy D4 ('Delivering good design') of the London Plan 2021.

37 Residential accommodation

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

Reason:

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

38 Piling

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

Reason:

The developer should be aware of the potential risks associated with the use of piling where contamination is an issue. Piling or other penetrative methods of foundation design on contaminated sites can potentially result in unacceptable risks to underlying groundwaters. We

recommend that where soil contamination is present, a risk assessment is carried out in accordance with our guidance 'Piling into Contaminated Sites'. We will not permit piling activities on parts of a site where an unacceptable risk is posed to Controlled Waters.

39 Piling Method Statement

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

Reason:

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

40 Trees

The existing trees on or adjoining the site which are to be retained shall be protected and both the site and trees managed in accordance with the recommendations (including facilitative pruning specifications and supervision schedule) contained in the Arboricultural Method Statement. 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 on the adjoining land 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 policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards and the following policies of The Southwark Plan (2022): P56 Protection of Amenity, P21 Conservation of the Historic Environment and Natural Heritage, P60 Biodiversity, and P61, Trees.

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

41 Archaeological Reporting

Within six months of the completion of archaeological site works, an assessment report detailing the proposals for post-excavation works, publication of the site and preparation of the archive shall be submitted to and approved in writing by the Local Planning Authority and that the works detailed in this assessment report shall not be carried out otherwise than in accordance with any such approval given.

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. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

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>.

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. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. 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>.

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

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.

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.

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:

Chapter 2 Achieving sustainable development

Chapter 6 Building a strong, competitive economy

Chapter 8 Promoting healthy and safe communities

Chapter 9 Promoting sustainable transport

Chapter 11 Making effective use of land

Chapter 12 Achieving well-designed places

Chapter 14 Meeting the challenge of climate change, flooding and coastal change

Chapter 16 Conserving and enhancing the historic environment

New London Plan 2021 Policies

On 2 March 2021, the Mayor of London published the London Plan 2021. The spatial development strategy sets a strategic framework for planning in Greater London and forms part of the statutory Development Plan for Greater London.

The relevant policies are:

GG1 Building strong and inclusive communities

GG2 Making the best use of land

GG3 Creating a healthy city

GG5 Growing a good economy

GG6 Increasing efficiency and resilience

Policy SD1 Opportunity Areas

Policy SD10 Strategic and local regeneration

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

Policy D2 Infrastructure requirements for sustainable densities

Policy D3 Optimising site capacity through the design-led approach

Policy D4 Delivering good design

Policy D5 Inclusive design

Policy D7 Accessible housing

Policy D8 Public realm

Policy D9 Tall buildings

Policy D11 Safety, security and resilience to emergency

Policy D12 Fire safety

Policy D14 Noise

Policy H1 Increasing housing supply

Policy H4 Delivering affordable housing

Policy H5 Threshold approach to applications

Policy H6 Affordable housing tenure

Policy H7 Monitoring of affordable housing

Policy H10 Housing size mix

Policy S1 Developing London's social infrastructure

Policy E2 Providing suitable business space

Policy E11 Skills and opportunities for all

Policy HC1 Heritage conservation and growth

Policy HC3 Strategic and Local Views

Policy HC4 London View Management Framework

Policy G1 Green infrastructure

Policy G5 Urban greening

Policy G6 Biodiversity and access to nature

Policy G7 Trees and woodlands
Policy SI 1 Improving air quality
Policy SI 2 Minimising greenhouse gas emissions
Policy SI 3 Energy infrastructure
Policy SI 4 Managing heat risk
Policy SI 5 Water infrastructure
Policy SI 6 Digital connectivity infrastructure
Policy SI 7 Reducing waste and supporting the circular economy
Policy SI 8 Waste capacity and net waste self-sufficiency
Policy SI 12 Flood risk management
Policy SI 13 Sustainable drainage
Policy T1 Strategic approach to transport
Policy T2 Healthy Streets
Policy T3 Transport capacity, connectivity and safeguarding
Policy T4 Assessing and mitigating transport impacts
Policy T5 Cycling
Policy T6 Car parking
Policy T7 Deliveries, servicing and construction
Policy T9 Funding transport infrastructure through planning

Southwark Plan 2022

ST1 Southwark's Development targets
ST2 Southwark's Places
SP1a Southwark's development targets
SP1b Southwark's places
SP1 Quality affordable homes
SP3 Great start in life
SP4 Green and inclusive economy

SP5 Thriving neighbourhoods and tackling health equalities

SP6 Climate Change

AV.13 Old Kent Road Area Vision

P1 Social rented and intermediate housing

P2 New family homes

P7 Wheelchair accessible and adaptable housing

P12 Design of places

P13 Design quality

P16 Designing out crime

P17 Tall buildings

P18 Efficient use of land

P21 Conservation of the historic environment and natural heritage

P23 Archaeology

P28 Access to employment and training

P30 Office and business development

P31 Affordable workspace

P44 Broadband and digital infrastructure

P45 Healthy developments

P49 Public transport

P50 Highways impacts

P51 Walking

P53 Cycling

P54 Car Parking

P55 Parking standards for disabled people and the mobility impaired

P56 Protection of amenity

P57 Open space

P59 Green infrastructure

P60 Biodiversity

P61 Trees

P62 Reducing waste

P64 Contaminated land and hazardous substances

P65 Improving air quality

P66 Reducing noise pollution and enhancing soundscapes

P67 Reducing water use

P68 Reducing flood risk

P69 Sustainability standards

P70 Energy

IP2 Transport infrastructure

IP3 Community infrastructure levy and section 106 planning obligations.

Mayors SPD/SPGs

Sustainable Design and Construction (April 2014)

Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy (April 2013)

London View Management Framework (March 2012)

Planning for Equality and Diversity in London (October 2007)

The Mayor's Good Practice Guide to Estate Regeneration

Southwark SPDs/SPGs

Design and Access Statements (2007)

Residential Design Standards (2011 with 2015 update)

S106 and CIL (2015)

S106 and CIL Addendum (2017)

Sustainability Assessments (2007)

Sustainable Design and Construction (2009)

Sustainable Transport (2009)

Southwark AAP's

Draft Old Kent Road Area Action Plan (December 2020)

APPENDIX 3: RELEVANT PLANNING HISTORY

Relevant Site History

There is some planning history on the site including enforcement enquiries, but these have been closed. The most relevant planning history on this site are:

06/AP/0786 Application type: Full Planning Application (FUL)
Use as place of worship (Class D2)

Decision date 10/08/2006 Decision: Refused (REF)

17/EQ/0397 Application type: Pre-Application Enquiry (ENQ)
Mixed use redevelopment of the site consisting of 38 residential units providing a mix of unit sizes alongside the provision of 417sqm of commercial accommodation and communal roof garden measuring 140sqm.

Decision date 16/02/2018 Decision: Pre-application enquiry closed (EQC)

18/AP/2761 Application type: Full
Demolition of existing buildings and construction of a 12 storey building (plus basement) comprising 46 residential dwellings (Class C3) and commercial floorspace (Class B1(c)), creation of a new vehicular access from Hornshay Street with landscaping (including a communal roof garden), cycle parking and associated ancillary development.

Decision date 28/05/2020 Decision: Grant with s106 agreement

20/AP/1489 Application type: Non-material minor amendment
Non material amendment to planning permission 18/AP/2761 dated 28th May 2020 for 'Demolition of existing buildings and construction of a 12 storey building (plus basement) comprising 46 residential dwellings (Class C3) and commercial floorspace (Class B1(c)), creation of a new vehicular access from Hornshay Street with landscaping (including a communal roof garden), cycle parking and associated ancillary development'. The amendments consist of the following:

- The realignment of windows and fenestration/brick columns to improve the verticality of the proposed building, while maintaining the same residential floor layouts as recommended for approval.
- The removal of the basement and the relocation of the cycle storage to the ground floor.
- Reconsideration of the ground and first-floor layouts, while maintaining an area of commercial space over the policy requirement of 390 sqm.
- The provision of alternative cycle storage to the rear to increase short stay commercial staff cycle provision and some additional residential cycle spaces utilising Sheffield stands.

Decision date 26/08/2020 Decision: Agreed

Relevant History of Adjoining Sites

The council has approved a number of planning applications recently in the Old Kent Road Opportunity Area including:

313-349 Ilderton Road:

17/AP/4819 Application type: Full

Mixed use redevelopment comprising:

Demolition of existing buildings and construction of two buildings one of part 11 & 13 storeys and one of part 13 and 15 storeys to provide 1,661sqm (GIA) of commercial floorspace (use class B1) at part basement, ground and first floors, 130 residential dwellings above (44 x 1 bed, 59 x 2 bed and 27 x 3 bed), with associated access and highway works, amenity areas, cycle, disabled & commercial car parking and refuse/recycling stores.

Decision date 13/05/2021 Decision: Grant with s106 agreement

20/AP/1329 Application type: Full

Demolition of existing buildings and construction of two buildings, one of part 11 and 13 storeys and one of part 13 and 15 storeys, to provide 1,739sq.m (GIA) of commercial floorspace, 250 student accommodation bed spaces (Sui Generis) and 58 residential units, with associated access and highway works, amenity space, cycle parking spaces, disabled car parking spaces and refuse/ recycling stores.

Decision date 13/05/2021 Decision: Grant with s106 agreement

APPENDIX 4: CONSULTATION UNDERTAKEN

Site notice date: 29.09.2021

Press notice date: 30.09.2021

Case officer site visit date: 01.10.2021

Neighbour consultation letters sent: 06.03.2021 and 28.09.2021

Internal services consulted

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

Statutory and non-statutory organisations

Environment Agency
 Greater London Authority
 Transport for London
 Metropolitan Police Service (Designing Out Crime)
 Thames Water
 National Grid
 London Fire & Emergency Planning Authority
 Natural England
 Historic England
 Health and Safety Executive: Fire Risk Assessments
 Arqiva
 Bakerloo Line Safeguarding
 Civil Aviation Authority
 Vital Old Kent Road

Neighbour and local groups consulted

Name/Address	Period	Date	Reply by
		Printed	

Flat 49 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/202 1
	B21	28/09/2021	19/10/202 1
	B21		
Flat 24 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/202 1
	B21	28/09/2021	19/10/202 1
	B21		
Flat 35 Kentmere House Tustin Estate Manor Grove L	B28	06/03/2021	04/04/202 1
	B21	28/09/2021	19/10/202 1
	B21		
Flat 17 Kentmere House Tustin Estate Manor Grove L	B28	06/03/2021	04/04/202 1
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	B21		
Flat 98 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/202 1
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Flat 1 Kentmere House Tustin Estate Manor Grove Lo	B28	06/03/2021	04/04/2021 1
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33 Manor Grove London Southwark SE15 1EQ	B28	06/03/2021	04/04/2021 1
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	B21		
13 Manor Grove London Southwark SE15 1EQ	B28	06/03/2021	04/04/2021 1
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Flat 76 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/2021 1
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	B21	28/09/2021	19/10/2021 1
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Flat 78 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/202 1

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Living Accommodation 224 Ilderton Road London Sout	B28	06/03/2021	04/04/2021 1
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Unit 11 Canterbury Industrial Park 297 Ilderton Ro	B28	06/03/2021	04/04/2021 1
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Flat 3 Kentmere House Tustin Estate Manor Grove Lo	B28	06/03/2021	04/04/202 1
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Unit 7 Canterbury Industrial Park 297 Ilderton Roa	B28	06/03/2021	04/04/202 1
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5 Manor Grove London Southwark SE15 1EQ	B28	06/03/2021	04/04/202 1
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49 Manor Grove London Southwark SE15 1EH	B28	06/03/2021	04/04/2021
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Flat 71 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/2021
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Unit 8 Canterbury Industrial Park 297 Ilderton Roa	B28	06/03/2021	04/04/2021
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Unit 10 Canterbury Industrial Park 297 Ilderton Ro	B28	06/03/2021	04/04/2021

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23 Manor Grove London Southwark SE15 1EQ	B28	06/03/2021	04/04/2021 1
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Unit 12 Canterbury Industrial Park 297 Ilderton Ro	B28	06/03/2021	04/04/2021 1
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Flat 57 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/2021 1
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Flat 92 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/2021 1
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1 Hornshay Street London Southwark SE15 1HB	B28	06/03/2021	04/04/2021 1
	B21	28/09/2021	19/10/2021 1
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8 Barnaby House Manor Grove London Southwark SE15	B28	06/03/2021	04/04/202 1
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5 Barnaby House Manor Grove London Southwark SE15	B28	06/03/2021	04/04/202 1
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6 Barnaby House Manor Grove London Southwark SE15	B28	06/03/2021	04/04/202 1
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Flat 19 Kentmere House Tustin Estate Manor Grove L	B28	06/03/2021	04/04/2021 1
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Flat 96 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/2021 1
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	B21		
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	B21	28/09/2021	19/10/2021
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	B21		
51 Manor Grove London Southwark SE15 1EH	B28	06/03/2021	04/04/2021
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Flat 90 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/2021
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Flat 85 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/202 1
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	B21		
Unit 5 Canterbury Industrial Park 297 Ilderton Roa	B28	06/03/2021	04/04/202 1
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Flat 84 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/202 1
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Flat 72 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/202 1

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	B21		
Unit 13 Canterbury Industrial Park 297 Ilderton Ro	B28	06/03/2021	04/04/2021 1
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11 Manor Grove London Southwark SE15 1EQ	B28	06/03/2021	04/04/2021 1
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Flat 54 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/2021 1
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Flat 29 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/2021 1
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Flat 64 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/2021 1
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Flat 88 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/2021 1
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Flat 37 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/202 1
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31 Manor Grove London Southwark SE15 1EQ	B28	06/03/2021	04/04/202 1
	B21	28/09/2021	19/10/202 1
	B21		
25 Manor Grove London Southwark SE15 1EQ	B28	06/03/2021	04/04/202 1
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	B21		
Flat 25 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/202 1
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	B21		
1 Barnaby House Manor Grove London Southwark SE15	B28	06/03/2021	04/04/202 1

	B21	28/09/2021	19/10/2021 1
	B21		
35 Manor Grove London Southwark SE15 1EQ	B28	06/03/2021	04/04/2021 1
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15 Manor Grove London Southwark SE15 1EQ	B28	06/03/2021	04/04/2021 1
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	B21		
1 Manor Grove London Southwark SE15 1EQ	B28	06/03/2021	04/04/2021 1
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Flat 45 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/2021 1
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	B21		
Flat 34 Kentmere House Tustin Estate Manor Grove L	B28	06/03/2021	04/04/2021 1
	B21	28/09/2021	19/10/2021 1
	B21		
Flat 61 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/2021 1
	B21	28/09/2021	19/10/2021 1
	B21		
Flat 38 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/2021 1
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Flat 74 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/2021 1
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Flat 69 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/2021 1
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Flat 41 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/2021 1
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	B21		

Flat 30 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/202 1
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9 Manor Grove London Southwark SE15 1EQ	B28	06/03/2021	04/04/202 1
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29 Manor Grove London Southwark SE15 1EQ	B28	06/03/2021	04/04/202 1
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	B21		
27 Manor Grove London Southwark SE15 1EQ	B28	06/03/2021	04/04/202 1
	B21	28/09/2021	19/10/202 1
	B21		
Flat 28 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/202 1
	B21	28/09/2021	19/10/202 1
	B21		
Flat 26 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/202 1
	B21	28/09/2021	19/10/202 1
	B21		
Flat 33 Kentmere House Tustin Estate Manor Grove L	B28	06/03/2021	04/04/202 1

	B21	28/09/2021	19/10/2021 1
	B21		
Flat 39 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/2021 1
	B21	28/09/2021	19/10/2021 1
	B21		
Flat 34 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/2021 1
	B21	28/09/2021	19/10/2021 1
	B21		
Unit 6 Canterbury Industrial Park 297 Ilderton Roa	B28	06/03/2021	04/04/2021 1
	B21	28/09/2021	19/10/2021 1
	B21		
Flat 27 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/2021 1
	B21	28/09/2021	19/10/2021 1
	B21		
4 Barnaby House Manor Grove London Southwark SE15	B28	06/03/2021	04/04/2021 1
	B21	28/09/2021	19/10/2021 1
	B21		
Flat 20 Kentmere House Tustin Estate Manor Grove L	B28	06/03/2021	04/04/2021 1
	B21	28/09/2021	19/10/2021 1

	B21		
Flat 18 Kentmere House Tustin Estate Manor Grove L	B28	06/03/2021	04/04/2021 1
	B21	28/09/2021	19/10/2021 1
	B21		
Flat 4 Kentmere House Tustin Estate Manor Grove Lo	B28	06/03/2021	04/04/2021 1
	B21	28/09/2021	19/10/2021 1
	B21		
Flat 94 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/2021 1
	B21	28/09/2021	19/10/2021 1
	B21		
Flat 59 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/2021 1
	B21	28/09/2021	19/10/2021 1
	B21		
Flat 50 Heversham House Tustin Estate Ilderton Roa	B28	06/03/2021	04/04/2021 1
	B21	28/09/2021	19/10/2021 1
	B21		
1 Hornshay Street London SE15 1HB	B28	06/03/2021	04/04/2021 1
	B21	28/09/2021	19/10/2021 1
	B21		

2 Hornshay Street London SE15 1HB	B28	06/03/2021	04/04/2021
			1
	B21	28/09/2021	19/10/2021
			1
	B21		
Flat 26 Leybourne House 19 Lovelinch Close Lond	B28	06/03/2021	04/04/2021
			1
	B21	28/09/2021	19/10/2021
			1
	B21		

APPENDIX 5: CONSULTATION RESPONSES RECEIVED

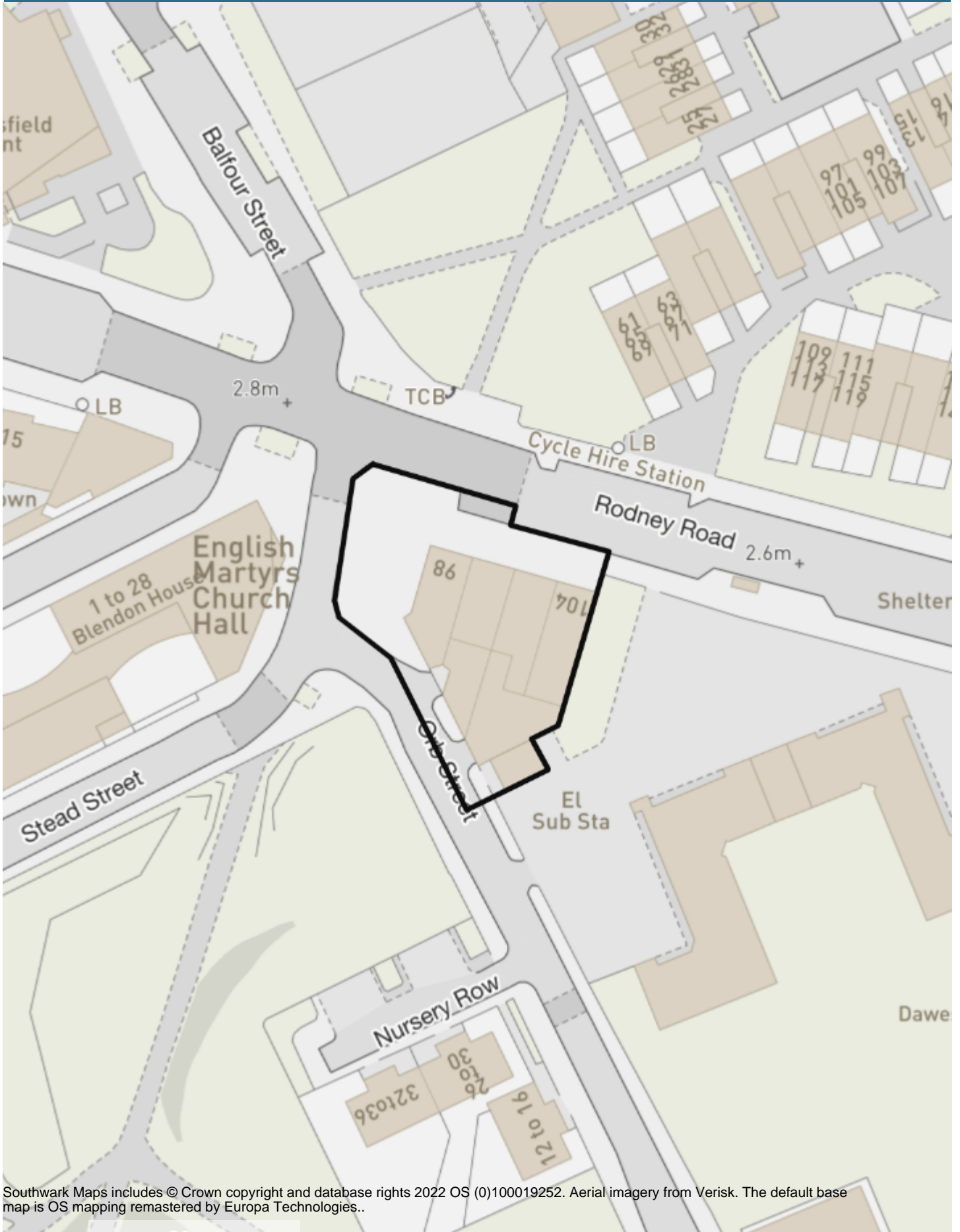
Statutory and non-statutory organisations

Arqiva
 Environment Agency
 Greater London Authority
 Transport for London
 Metropolitan Police Service (Designing Out Crime)
 London Fire & Emergency Planning Authority
 London Underground
 Network Rail
 Natural England
 Historic England
 Health and Safety Executive: Fire Risk Assessments
 Bakerloo Line Safeguarding

Neighbour and local groups

Tustin Residents Project Group
 Tustin Community Association
 40 Windermere Point Old kent road, Tustin Estate London SE15 1DT
 31 Hillbeck Close Tustin Estate London SE15 1EE
 67 Grasmere Point Tustin Estate London SE15 1DU
 Pilgrims' Way Primary School Manor Grove London SE15 1EF
 85 Heversham House Tustin Estate London SE15 1DT
 3 Hillbeck close Tustin estate London SE15 1EE
 1 Heversham house Ilderton Road, Tustin Estate London SE15 1EJ
 49 Windermere Point Tustin Estate London SE15 1DZ
 77 Manor Grove London SE15 1EH
 50 Grasmere Point Tustin Estate London SE15 1DU
 24 Bowness House Hillbeck close, Tustin Estate London SE15 1DS
 35 Manor Grove Tustin Estate London SE15 1EQ
 12 Grasmere point Tustin Estate London SE15 1DT
 68 Ambleside point Old kent road, London SE15 1DT
 36 Grasmere point Tustin Estate London SE15 1DT
 Flat 1, Heversham House, Ilderton Road, London SE15 1EJ
 24 Grasmere Point Tustin Estate London SE15 1DT
 28 Kentmere House, Manor Grove Tustin Estate London SE15 1EG
 29 Ambleside point Tustin Estate London SE15 1DT
 23 Heversham House Tustin Estate London SE15 1EB
 Heversham House London SE15

39 Ambleside Point Tustin Estate London SE15 1EB
36 Kentmere house Manor Grove, Tustin Estate London SE15 1DT
59 Ambleside Point Tustin Estate London SE15 1EB
30 Grasmere Point Tustin Estate London SE15 1DT
Flat 7 Windermere point Old Kent road London SE15 1 DY



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Contents

Contents.....	1
EXECUTIVE SUMMARY	2
BACKGROUND INFORMATION	4
Details of proposal.....	7
Planning history of the site, and adjoining or nearby sites.....	10
KEY ISSUES FOR CONSIDERATION	10
Summary of main issues	10
Legal context	11
Planning policy	11
ASSESSMENT.....	12
Principle of the proposed development in terms of land use	12
Environmental Impact Assessment.....	15
Design, layout and impact on townscape views and heritage assets	16
Inclusive design.....	21
Impact of proposed development on amenity of adjoining occupiers and surrounding area	22
Transport and Highways.....	26
Ecology, biodiversity and green infrastructure	29
Environmental matters	29
Mayoral and borough community infrastructure levy (CIL)	40
Community impact and equalities assessment.....	42
Human rights implications	43
Positive and proactive statement	44
Positive and proactive engagement: summary table	44
CONCLUSION	44
BACKGROUND INFORMATION	44
BACKGROUND DOCUMENTS.....	45
APPENDICES.....	45
AUDIT TRAIL.....	45
Appendix 1: Recommendation.....	46
Appendix 2: Relevant Planning Policies.....	62
Appendix 3: Consultation undertaken	65
Appendix 4: Consultation Responses Received.....	77

Item No.	Classification:	Date:	Meeting Name:
6.3	OPEN	18 October 2022	Planning Committee
Report title:	Development Management planning application: Application 20/AP/2953 for: Full Planning Application Address: 98-104 RODNEY ROAD SE17 1RA Proposal: Redevelopment of 98-104 Rodney Road for a 9 storey (plus basement) building for hotel (126 bedrooms), cafe, community use, retail use and associated cycle/disabled parking, plant and landscaping.		
Ward(s) or groups affected:	North Walworth		
From:	Director of Planning and Growth		
Application Start Date: 09/10/2020		PPA Expiry Date: n/a	
Earliest Decision Date: 08/01/2021			

RECOMMENDATION

1. That planning permission be granted, subject to conditions and the applicant entering into an appropriate legal agreement.
2. In the event that the requirements of (1) are not met by 28th February 2023 the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 170 of this report.

EXECUTIVE SUMMARY

3. The proposal has been prepared on behalf of Elephant & Castle Project Ltd and SPAARC architects. The proposals is to demolish the existing single-storey buildings on site, and construct a nine-storey plus basement building for 126 hotel guestrooms with café, community and retail use on ground and first floor.
4. The hotel's intended user is Tribe Brand, which forms part of an international hotel group Accor. This would be the first Tribe Hotel in London and in England. Accor is the sixth largest hotel group in the world. Tribe is a streamlined, midscale hotel at an affordable price-point.
5. The scheme has been developed in conjunction with the Arts Network who would be the first occupier of the community use on site. The Arts Network is a charity which provides creative activities and events for people with mental ill health across south-east London. The first-floor community space will accommodate the main headquarters for the charity, a space for community provisions such as after

schools club, public gallery space, meeting space for local tenant's association, art and creative workshops. A memorandum has been entered where the Arts Network will be the intended end-user for a minimum of ten years. The Arts Network also hope to use the café and hotel areas as training and volunteering opportunities for its members.

6. The application site is located in the Elephant and Castle Opportunity Area (Brandon Street) character area and Central Activities Zone. The building is proposed at 28.660m AOD and falls below the threshold the 30m threshold for tall buildings.
7. The development would result in a net uplift of 4,480 sqm floor space, predominantly hotel floor space with some retail and community floor space. This would generate an estimated 32 full time equivalent (FTE) jobs for the completed development. There would also be 13 sustained jobs for Southwark residents, 11 short courses and three construction industry apprentices during the construction phase. Where these targets cannot be provided, a financial contribution would be sought to fund equivalent opportunities for employment and training in the local area.

The table below details the floor space breakdown of the existing site compared with the proposed development.

Use Class	Existing sqm	Proposed sqm	Change +/-
Use Class E (a) to (f) retail/financial services	76	318	+242
Use Class F Community	0	354	+ 354
Use Class C1 Hotel	0	4,252 (126 guestrooms)	+ 4,252
Sui Generis	368	0	-368

8. The development would achieve 59.8% carbon savings on-site and a BREEAM rating of "Excellent". It would deliver an Urban Greening Factor (UGF) of 0.43 and a proposed Greenfield run-off rate of 1.5l/s. No trees would be lost. Green roof is proposed to accord with sustainable drainage principles
9. The proposal would secure long stay and short stay cycle parking spaces on site including two cargo and disabled cycle parking spaces. Two Electric Vehicle Charging Points (EVCPS) are to be provided.
10. A Section 106 agreement would be entered into to secure £45,000 to support TFL docking station near the site and £282,150 for the Green Buildings fund to support carbon mitigation measures. In addition, the Section 106 would secure up to £55,950 for any shortfall in sustained jobs, short courses and apprentices during the construction, and £55,900 for any shortfall in sustained jobs to Southwark residents post construction.

CIL (estimated)	£670,908.63
MCIL (estimated)	£280,567.64
S106	£45,000 TFL £107,850 Local Employment Requirements £282,150 carbon offset Administration costs Total charge: £435,000

11. 75 representations were received from members of the public, 55 in support, 15 objections and 5 neutral, received across two rounds of consultation. 12 of these objections were received at the first round of consultation and 3 objections were received for the second round of consultation.

BACKGROUND INFORMATION

Site location and description

12. The site is on the corner of Rodney Road and Stead Street. It currently comprises four single storey retail units with a primary frontage on Rodney road. Whilst the site perimeter also faces both Stead Street and Orb Street, the frontages here aren't active. The site is 516sqm in size.

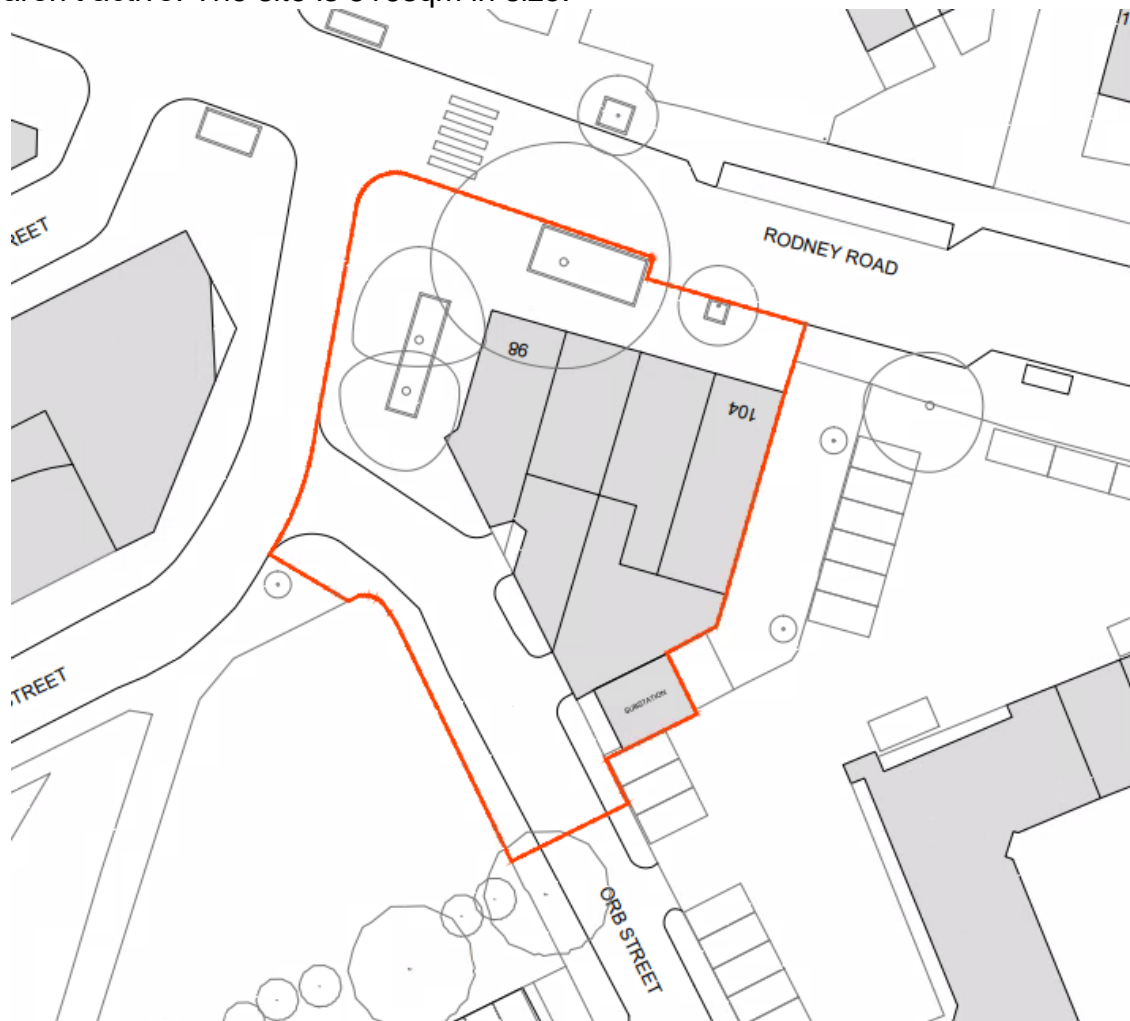


Figure 01 (above): Site location plan, showing the site boundary edged in red.

Surroundings and designations

13. The site is surrounded mainly by residential uses including recently built blocks of flats (Blendon House) to the south west on the corner of Stead Street and Rodney Road, rising 6 storeys in height. The English Martyr Church Hall is at the ground floor of Blendon House. There is a council block of flats to the east at Dawes House at 5 storeys. Mansfield Point to the north west on Rodney Road is also a recently completed block of flats that rises to 9 storeys. Nursery Row Park (Borough Open Land and SINC) is located immediately to the south of the site. In the surrounding areas there is also a school and some small scale retail units.
14. The site is within the Central Activities Zone (CAZ), located on the south-eastern boundary. The surrounding area marks a transitional point between the dense urban development focussed at Elephant and Castle to a more restrained urban/suburban character.

15. The site is also within the boundary of the Walworth Neighbourhood Plan Area, located on the northern boundary. The site has a range of historic qualities and a strong local identity, with a mix of newer architectural styles and large-scale post war local authority housing developments. The area is positioned to the south of the large-scale redevelopment at Elephant Park and the recently consented development of the Elephant & Castle shopping centre, both of which are within walking distance.
16. The site also lies within the Elephant and Castle Opportunity Area (within the Brandon Street Character Area). The London Plan identifies this area as having the potential to provide 5,000 new jobs by encouraging more offices, hotels, small businesses and developing the evening economy and cultural activities.
17. Running south-east from Elephant & Castle, Rodney Road is a link within a short distance of this important transport hub and evolving destination.
18. The site is not in a Conservation Area. Larcom Street Conservation Area is to the south-west of the site. The Mission Conservation Area is to the south east of the site. Yates Estate and Victory Conservation Area is to the north of the site and the Walworth Road Conservation area is further south of the site. There are a number of Grade II listed buildings within the vicinity. This includes Lady Margaret Church (north on Balfour Street), the Roman Catholic Church of the English Martyrs and its Presbytery (east on Rodney Road) as well as the English Martyrs Primary School (south-east on Flint Street).

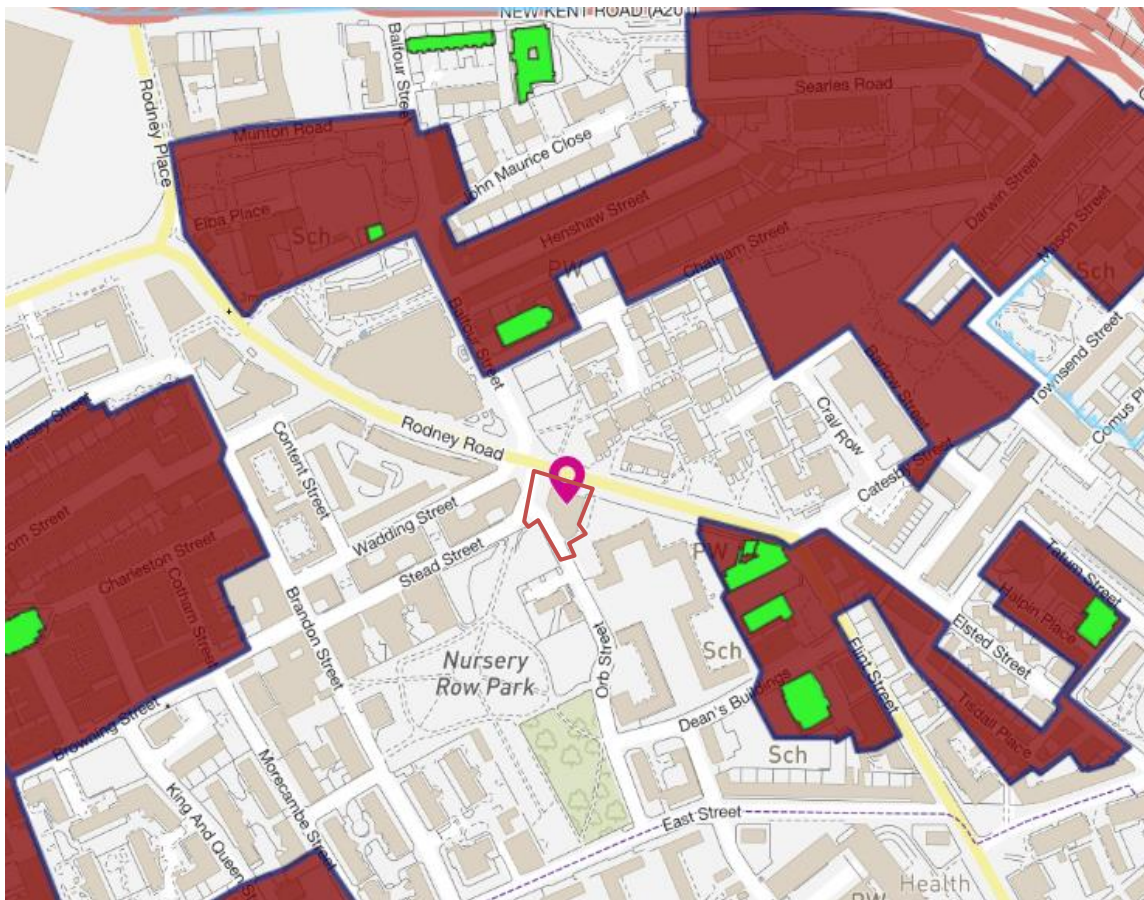


Figure 2: (above) Heritage assets in the surrounding area.

Details of proposal

19. The proposal is to demolish the existing single-storey buildings on site, and construct a nine-storey plus basement building for 126 hotel guestrooms with café, community and retail use on ground and first floor. The scheme has been developed in conjunction with the Arts Network who would be the first occupier of the community use on site.
20. Changes during the course of this application include:
 - Removal of the changes to Orb Street initially proposed
 - Removal of the uppermost planter facing Rodney Road
 - Introduction of a setback at level 08 facing Nursery Row Park
 - Reduction of the cantilever by 1.2m facing Nursery Row Park. The cantilever is now 3.355m as shown on Proposed Schematic Section 02 RR-S-26-MF-01-02 P3
 - Increase in height on Rodney Road by 1m
 - Introduction of darker tone to the ground and first floor, including the cantilever soffit
 - Introduction of picture window facing Nursery Row Park
 - Public realm improvements within existing the pavement areas on both side of Orb Street
 - Existing brick wall fronting Nursery Row Park to be removed and re-landscaped, allowing step free access to the park
 - Placement of an extra disabled parking bay on Orb Street
 - Reduction of the basement by 50sqm so it's the same footprint as the ground floor.
 - Rodney Road taxi and delivery bays amended
 - Reduction in hotel rooms from 130 to 126 rooms
 - Updated floor plans because of changes for fire safety (e.g. entrance door 1600mm from 1500mm).
21. Additional material requested include:
 - Arts Network business plan
 - Energy Report Addendum including Be Seen matrix
 - Full Fire Statement in accordance with the London Plan
 - Urban Greening Factor (UGF) Statement
 - Verified views

Consultation responses from members of the public and local groups

22. Public consultation was undertaken twice, following amendments to the proposal. Overall 650 neighbours were consulted, 75 comments were received comprising of 55 comments in support, 5 neutral comments and 15 objections. 12 objections were received during the first round of consultation. Following re-consultation in June 2021 after receipt of the amendments, 1 objection was received from a member of the public retaining their previous objection, in addition to maintained objections from the Walworth Society and the Friends of Nursery Row Park.

23. Summarised below are the objections raised by members of the public with an officer response addressed in summary below and with further detail within the relevant sections in the report.

24. Land use:

- Insufficient creation of jobs, particularly for local people
- No local demand or need for a hotel
- Lack of public benefits

Officer response:

The Hotel Needs Assessment outlines the pipeline for hotels in the locality, and recognises that only two other hotels are currently located in the ward. This outlines a projected demand for the hotel in this location, evidencing that demand is present in this location. The expected creation of FTE jobs is 32. 13 of these will be secured within the S106 agreement to be designated to unemployed Southwark residents. Additional training and apprenticeships for Southwark residents is also included within the S106. The public benefits additionally include the use of the community space and uplift in retail and cafe use.

25. Design:

- Hotel entrance not clear, but congested
- Development too high
- Out of keeping with character of area
- Poor design quality, poor choice of materials
- Overdevelopment
- Impact on views
- Limited light into proposed community room as a result of the overhang

Officer response:

The hotel is located at the junction of Rodney Road and Orb Street, which is the most prominent location on site. The design, scale and massing is acceptable for the site as outlined in detail within the design section of this report.

26. Amenity Impacts:

- Loss of light
- Loss of privacy
- Construction impacts
- Increased anti-social behaviour, particularly for neighbouring estates

Officer response:

The daylight sunlight impacts are not such that would cause unacceptable impact to neighbouring properties in regard to BRE guidance or significantly harm residential amenity. The neighbouring residential properties are within acceptable distances from development to prevent overlooking and privacy impacts. A construction management plan is to be secured to ensure impacts during construction are minimised. The S106 agreement would require workspace and hotel management plans to be submitted for approval which would include management of the external spaces, and Secured by Design certification would require measures such as CCTV and good levels of lighting to be installed throughout the site.

27. Transport:

- Highways and transport impact – closing of Orb Street
- Loading bays and impact on footway width
- Overhang too large without licence and impact on highway

Officer response:

The overhang is located within the applicant's ownership. Licencing will be undertaken through the S278 procedure. Following amendments to the scheme Orb Street will not be closed, and remains a thoroughfare. The loading bays have been agreed by the Council's transport and highway teams, and details would be secured through condition.

28. Public Space, Greening and Landscaping:

- Loss of trees
- Impacts of blocking up on Nursery Row Park
- Overall impacts on Nursery Row Park

Officer response:

No trees are proposed to be removed as part of this proposal. The existing trees will be protected through condition. The park boundary will be retained and the existing park wall will be removed to achieve a better connection between the hotel and the park. The design and layout of Orb Street was revised through the amendments, and there will no longer be a closure on Orb Street.

29. Environmental Impacts:

- Energy efficiency implications of design

Officer response:

The energy impacts are in line with the Southwark Plan and London Plan policy requirements. Monitoring will take place through the BREEAM and Be Seen process, to ensure energy efficiency targets are achieved.

30. Community Engagement:

- Lack of consultation in SCI with the local community

Office response:

The submitted development consultation charter outlines the consultation procedure that has taken place. The amended proposals have responded to the comments made by local community in the original consultation.

31. 52 comments in support were received during the course of this application including 13 comments received during the second round of consultation. Summarised below are the reasons for support raised by members of the public:

- Supportive of overall regeneration of the area
- Supportive of hotel in this location and potential to support local businesses and provide local jobs
- Supportive of height and massing
- Benefits to the community
- Blocking up of Orb Street (north end)
- Supportive of Community Use
- High quality design
- Sustainable and energy efficient development
- Suitable within the character of the local townscape

- High quality consultation procedures
- Improved commercial space opportunity
- Improvements to Nursery Row Park

32. The Walworth Society and Friends of Nursery Row Park have both commented on the application. Both of these community groups maintained their objections in response to the changes to the proposed design.
33. The Walworth Society:
- objection to the amount of daylighting into the proposed community rooms
 - over-development of the site
 - concern over the overhang (4m)

Officer Response: The internal daylighting of the proposed community rooms meet BRE guidance. The site is located in a site designation where increased densities are expected. The overhang has been reduced during the course of this application to 3.35m.

34. Friends of Nursery Row Park:
- Concern over the overhang (4m) and licence required
 - Park refurbishment plan not supported
 - Tree loss

Officer response: The overhang has been reduced during the course of this application to 3.35m and the licencing will take place as part of the s278 process. The park refurbishment plan has been developed in consultation with the Council's Park and Leisure team. No trees are proposed to be removed through this application and all trees will be protected through a condition.

Planning history of the site, and adjoining or nearby sites.

35. There is no relevant planning history on this site. The site has undertaken a number of pre-applications (16/EQ/0086, 16/EQ/0248, 19/EQ/0015 and 19/EQ/0348).

KEY ISSUES FOR CONSIDERATION

Summary of main issues

36. The main issues to be considered in respect of this application are:
- Principle of the proposed development in terms of land use;
 - Environmental impact assessment;
 - Design, including layout, building heights, and landscaping;
 - Heritage considerations;
 - Archaeology;

- Impact of proposed development on amenity of adjoining occupiers and surrounding area, including privacy, daylight and sunlight;
- Transport and highways, including servicing, car parking and cycle parking;
- Environmental matters, including construction management, flooding and air quality;
- Energy and sustainability, including carbon emission reduction;
- Ecology and biodiversity;
- Planning obligations (S.106 undertaking or agreement);
- Mayoral and borough community infrastructure levy (CIL);
- Consultation responses and community engagement;
- Community impact, equalities assessment and human rights.

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

Legal context

38. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2021 and the Southwark Plan 2022. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers determining planning applications for development within Conservation Areas to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. Section 66 of the Act also requires the Authority to pay special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest which they possess.
39. There are also specific statutory duties in respect of the Public Sector Equalities Duty which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

Planning policy

40. The statutory development plans for the Borough comprise the London Plan 2021 and the Southwark Plan 2022. The National Planning Policy Framework (2021) and emerging policies constitute material considerations but are 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.
41. The site is located within the following policy designations:
- Elephant and Castle Major Town Centre
 - Elephant and Castle Opportunity Area (within the Brandon Street Character Area)
 - Central Activities Zone (CAZ)
 - Elephant and Castle Strategic Cultural Quarter
 - Walworth Neighbourhood Plan Area
 - London Views Management Framework extended background vistas - Alexandra Palace viewing terrace to St Paul's Cathedral

- Air Quality Management Area
- Flood Zone 3

ASSESSMENT

Principle of the proposed development in terms of land use

42. Class E was introduced from 1 September 2020 to replace classes A1/A2/A3,B1, D1(a-b) and indoor sport from D2(e). The flexible land use requested for the commercial component of this application which is referred to as flexible (A1/A2/A3/B1a/D1) in the submission documents, will therefore be treated and referred to as Class E in this report. No mitigation is necessary to restrict within the Class E use, as a result of the changes to the Use Class Order.
43. Class F was introduced from 1 September 2020 to replace classes D1 and D2(e) as well as newly defined local community uses. The flexible land use requested for the community component of this application, which are referred to as D1 in the submission documents, will therefore be treated and referred to as Class F in this report. No mitigation is necessary to restrict within the Class F use, as result of the changes to the Use Class Order.
44. The proposed development would comprise of ancillary services for the hotel at basement level, café and retail units at ground floor level, the community resource centre and café space at first floor level, and hotel use across levels 2 to 8.

Sui generis use, retail and café use (Class E(a-b))

Loss of sui generis and small shops

45. The site currently comprises four commercial units with primary frontage facing Rodney Road, a supermarket (Class E(a) retail) and a betting shop, a takeaway and a laundrette (sui generis). The existing sui generis use class are 108sqm, 81sqm and 179sqm in size providing a combined total of 368sqm sui generis use class to be lost as part of the proposed development.

Business relocation

46. Policy P33 of the Southwark Plan requires all small shops to be displaced by development to have a business relocation strategy, written in consultation with affected businesses, which sets out viable relocation options. Three business are currently operating at 98-104 Rodney Road. A letter of intent was provided by each of the businesses. The operator of the laundrette has confirmed they will be retiring in 2022 and therefore do not require re-location. The takeaway operator has confirmed that their short term license is expiring in 2022 and due to the impacts of covid they have decided to close this shop and offer the existing staff alternative jobs at other premises within the chain of shops. However, they did raise that they would be willing to consider a new unit if this was offered. The mini market operator have confirmed that they are intending to lease the new commercial space offered as part of this development. The business re-location strategies would be facilitated through the S106 agreement.

Commercial use re-provided

47. The existing retail use on site is 76sqm and classified as a small shop protected under Southwark Plan Policy P32. The retail use on site is proposed to provide 135sqm of Class E(a) retail floor space and is feasible in terms of providing necessary storage and servicing space for the existing use as required by this policy. The proposed re-provision of retail use within the submitted documents is therefore policy compliant.

Introduction of new café use

48. A new café use Class E(b) is proposed on site, comprising 182sqm, providing a combined gross uplift of 317sqm or net uplift of 241sqm of Class E. This uplift of Class E use and replacement of existing Sui Generis use is appropriate to the CAZ designation and provides an efficient use of Land. Class E uses are common near residential properties and should not result in any loss of amenity for surrounding area or hotel guests subject to conditions on hours of use and plant.

49.

Use Class	Existing floor space (GIA) sqm	Proposed floor space (GIA) sqm
Hotel (C1)	0	4,252
Cafe (Class E(b))	0	183
Retail (Class E(a))	76	135
Sui generis <ul style="list-style-type: none"> • Laundrette • Betting office • Takeaway 	368	0
Community (Class F)	0	354
Total	444	4,924
Net Increase	4,480	

Table 01 (above): Proposed and existing uses (sqm)

Community Use (Class F)

50. A new community use is proposed be introduced at first floor level, providing a net uplift of 354sqm of Class F floor space. Considering the site's location within the major town centre, the introduction of a new community use as part of this development would be policy compliant. A first provider has been identified on the site, as Arts Network who are a mental health charity based in Southwark and Lewisham.
51. The Southwark Plan Policy P47 states that new community facilities will be permitted where provision is made for the facility to be used by all members of the community. The applicant has confirmed that space would also be available for the public and would not be restricted to use as part of the Arts Network operations.
52. One of the questions raised by officers was the viability of a community use in this

location. To address this, the Arts Network have provided a proposed activities document including financials, which states that they have two years of confirmed income, in contrast to other charities who often have a confirmed income for a 6-month period. The activities proposed to take place on site by the Arts Network includes:

- The main headquarters for the charity
- Creative workshops, including referrals from the local community health hub
- Manage the space for community provision for other community groups to meet

53. A Memorandum of Understanding has been entered into, dated 30th March 2021, between Elephant and Castle Projects Limited and the Arts Network. This confirms the intent of Arts Network to occupy the proposed first floor community space. This has specified expected income for the first year and sets out a contract specifying an initial ten-year commitment for the Arts Network to occupy the space at a subsidised rent, including fit out costs, and then at a reduced rate (market rate minus 30%) thereafter. This would all be secured within the S106 agreement.

Hotel Use (Class C1)

54. Policy E10 of the London Plan estimates that to meet accommodation demands of tourists, London will need to build a net increase of 58,000 bedrooms of serviced accommodation by 2041. Policy E10 supports the delivery of new hotels in town centre locations and within the CAZ. The application site is located within the CAZ and has a high public transport accessibility level of 6b (representing the highest level of accessibility). The site is approximately 950m south-east of Elephant & Castle Underground station and 850m south-east of the Elephant & Castle Thameslink railway station. There are also two bus routes with stops a few metres from the site.
55. The site is well-suited for hotel use given its excellent accessibility to public transport and close proximity to a number of major tourist attractions, particularly servicing new commercial and leisure growth to the Elephant and Castle Town Centre.
56. A Hotel Needs Assessment dated July 2019 and a Hotel Needs Assessment Addendum dated September 2020 by Avison Young were submitted as part of the application. The purpose of this was to assess whether the proposal would result in an over dominance of visitor accommodation and to adequately assess the demand for a hotel in this location.
57. Southwark as a whole has 35 hotels (with 20+ bedrooms) clustered to northern part of the borough, principally in the Southbank area. Elephant and Castle currently has only three hotels, which are two-star or below. These consist of the Eurotraveller Hotel Express (31-bedrooms, two-star), Accommodation London Bridge (44-bedrooms, limited service) and The Bridge Hotel (60-bedrooms, two-star).

58. The Hotel Needs Addendum report (September 2020) identified 30 schemes in the planning pipeline within two miles of the site, representing a potential increase of 4,912 bedrooms. Five of these projects are currently under construction (according to the AMPM Hotels Database). The two hotels nearest the site in the planning pipeline includes New Kent Road (200-bedrooms, three-star) and the Travelodge Newington Causeway (140-bedrooms, limited service). The remainder of the pipeline schemes aren't in the Elephant and Castle sub-area.
59. Considering the ongoing regeneration to the Elephant and Castle, it is reasonable to expect to see hotel accommodation provided in these areas. The number of hotel developments, both built and in the development pipeline, has increased significantly in the last decade and these are concentrated in the northern part of the borough. The limited number of hotels in this area and the growing mixture of uses, which include offices, residential and retail, establishes a reasonable demand for a hotel-use in this location.
60. Overall, given that the wider area is still very mixed, it is not felt that the proposed development would result in an over-dominance of hotels in the area, nor adversely affect the character of the area or prevent other uses from functioning successfully. Taking account of the weight of support London Plan Policy E10 gives to hotel use in the CAZ and Opportunity Areas, and the importance of tourism to London's economy, the proposed hotel on this site is therefore an acceptable land use.
61. The proposed development would provide a mix of uses that are appropriate for the site's location within the CAZ, Opportunity Area, Strategic Cultural Area and Major Town Centre. The hotel and community uses, would support the cultural and visitor functions of the area. This is in line with the Mayor of London's ambition and supports the overall transformation within the Elephant and Castle area.
62. The S106 agreement would require workspace and hotel management plans to be submitted for approval, which would include management of the external spaces. Secured by Design certification would require measures such as CCTV and good levels of lighting to be installed throughout the site. Conditions have also been included in the draft recommendation to limit plant noise and to restrict servicing hours and this is considered further in the following sections of this report.

Environmental Impact Assessment

63. The European SEA Directive is transposed into UK law by the Town and Country. The Planning (Environmental Impact Assessment) (Amendment) Regulations 2017 Regulations set out the circumstances under which development needs to be under pinned by an Environmental Impact Assessment (EIA). Schedule 1 of the Regulations set out a range of development, predominantly involving industrial operations, for which an EIA is mandatory. Schedule 2 lists a range of development for which an EIA might be required on the basis that it could give rise to significant environmental impacts. 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.

64. The development is not considered to constitute EIA development, based on a review of the scheme against both the EIA Regulations and the European Commission guidance.
65. 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 significant environmental impacts. The proposed application is the redevelopment of an existing site for the purposes of a hotel, cafe, retail and other community uses. Its scale is appropriate to its urban setting and it is unlikely to give rise to any significant environmental impacts.

Design, layout and impact on townscape views and heritage assets

66. Pre-application discussions in January 2020 (20/EQ/00348) generally supported the positioning, height and massing but raised concern with the assertive architecture. Further revisions have been made to the planning application following its submission in October 2020, including to the basement, detailed massing and layout.
67. The existing shops are of a low design quality, detracting from the adjoining streetscapes. Their demolition and replacement with a building of improved architectural and townscape quality is welcome.
68. The replacement scheme is for a 9-storey building above two basement storeys, with its footprint at ground floor and 1st floors covering the previous shop site, with the upper floors cantilevering above the adjacent pavements onto Rodney Road and Orb Street and the final floor setback from Orb Street. The hotel lobby, café and community use form a free-flowing, publically accessible ground floor space. The community use extends up to the first floor with controlled public access and is designed to allow a flexible use of the space for offices, teaching rooms, gallery and studio space and a café/ lounge area. 126 hotel rooms are arranged across the remaining upper floors comprising 19 rooms per floor at level 2 to 7 and 12 rooms at level 8. A core staircase and lifts run up through the centre of the building including an evacuation lift. An existing substation is retained outside of the building footprint on the southern edge of the site, in addition to a new substation adjacent to this but within the building footprint. The basement contains ancillary services (plant and stores).
69. The proposed building is to be arranged over basement, ground and eight upper storeys with a height to the top of the parapet of 28.660m. The building is not tall building as fall below the 30 metres height threshold.
70. Policy P41 of the Southwark Plan requires the development of hotels to ensure that the design, scale, function, parking and servicing arrangements respond positively to local character and protect the amenity of the local community and visitors to the hotel. A minimum of 10% of the total floor space must be provided as ancillary facilities in hotel developments that incorporate a range of publicly accessible daytime uses and offer employment opportunities.

Scale, massing and height

71. The scheme has been tested in the local and wider views as well as the strategic views as set out in the London View Management Framework (2012). These accurate visual representations which comply with the requirements of the LVMF demonstrate the contribution of this proposal to the London skyline. These views are provided in section 1.4 of the Design and Access Statement Addendum by SPPARC and the Verified Views Methodology by Cityscape dated July 2020.
72. The views considered include:
- View 1 - Rodney Road looking east towards the site
 - View 2 - Balfour Street looking south towards the site
 - View 3 - Rodney Road looking west towards the site
 - View 4 - Nursery Row Park looking north towards the site
 - View 5 - Stead Street looking north-east towards the site
73. Its height would be taller than the 5-storey Dawes House (c.17m to ridge) and 3-storey housing (c.11m to ridge) around Salisbury and Hillery Close, but is lower than Mansfield Point (32m) and not much taller than Blendon House (21m) and Winch House (23m). The final floor is setback 3m from Orb Street, giving an 8-storey shoulder height of c.26m, which eases its sense of height onto Nursery Row Park (verified view 04) and in townscape views along Orb Street and especially neighbouring Stead Street (verified view 05). The final storey incorporates all plant, with the exception of the lift overrun. This brings a clean line to the roof form, which will be evident in longer street views above the surrounding tree canopy.



Figure 03: (above) Elevation view from Rodney Road/Balfour Street



Figure 04: (above) Elevation view from Stead Street adjacent to Nursery Park Row

74. Fronting Rodney Road, the building is scaled well with the main road and its open setting (verified views 02 and 03). The building is obscured from views from the Peabody Estate by the existing context (verified view 01). It would likely be similarly screened from views from the nearby Grade II listed churches and from the Larcom Street Conservation Area, and therefore would have no significant impact on the settings of these heritage assets, preserving their significance.
75. The building is of substantial volume relying on the cantilever to deliver functional hotel floorplates, without recourse to a tall building and uses the articulated form well. This gives the building a notable massing profile, as well as providing sheltered entrances and the opportunity for covered seating at street level. The cantilevers are evident but at 1m onto Rodney Road and at 3m onto Orb Street, are not so prominent as to appear overwhelming. The setback final storey further eases the massing. The articulated built form is supported by the two-storey base, which reads proportionate to the massing above and gives the building its strong connection to the adjoining public realm. The massing is large but not unduly bulky and overall supports the building's townscape prominence.

Architectural Design

76. The architecture is modern, comprising banded masonry elevations that articulate and fold to form projecting planted terraces and rounded corners. The building features a double-storey base set beneath the cantilevers with large openings onto Rodney Road, Stead Street and Orb Street, and a wide picture window on

the 1st floor above. The architecture has a strong design concept and a robust built form, counterbalanced by the fluidity of its façade designs and soft building corners that eases its massing and works well with the site geometry. Overall, the development would deliver an engaging design, providing a notable new building of landmark quality that responds to its prominent townscape position and interacts well with the adjacent public realm.

77. The articulated built form is reinforced by its elevational architecture, which is fluid with its undulating facades that incorporate occasional planted terraces gently projecting forward to give the massing a dynamic form. The masonry and glazing facades are arranged in bands, with the striations exaggerating the building's dynamic form, as well as reflecting the horizontal design emphasis of Dawes House nearby. The finish has sufficient solidity and gives the facades a visual richness. The façade section details (including planters and parapets) are to be confirmed by condition.
78. The masonry comprises brick in a Roman format using a stretcher bond, which adds to the horizontality of the designs. The brickwork is carried across the large window openings on the upper floors to form brise-soleil. This maintains the simple material palette and adding detail, with the brickwork in a light brown colour for the 2nd to 8th floors. A darker brown brick with a glazed finish is used for the ground and first floors and the cantilever soffits, retaining the Roman format and stretcher bond finish. This brings greater visual distinction to the base, emphasising the building's elevational hierarchy. It also presents a more robust finish to the building's public frontages. The base has a more open, transparent appearance supporting good engagement with the adjoining public realm. This conveys the sense of this being a public building and not simply a hotel. The brick is complemented by an anodised bronze framing system for the windows and doors. The final materials and the design details, including the construction of the masonry brise-soleil and window openings (incl. the provision of natural ventilation within bedrooms) should be confirmed by condition. This should also include the brickwork, which should be full brick for robustness and quality, and should be carefully selected for subtle multi-tones.

Public realm and landscaping

79. The proposals include changes to the adjacent public realm, with the surrounding mature street trees retained and set within upgraded footways. The opportunity is being taken to improve the site's connectivity with the park opposite, with the parkland adjacent to Orb Street re-landscaped to come to grade. As stated above, the cantilever above the footway allows the opportunity for the ground floor activity to onto the footway, improving the building's sense of engagement.
80. During the course of this application, the proposed public realm scheme was amended to maintain the pavement between Nursery Row Park and Orb Street and maintain Orb Street as a two-way highway. The disabled parking bay on Orb Street will also be retained. There will be a continuous level pavement alongside the proposed building. The improvements to the public realm are concentrated within this existing pavement area.
81. The existing brick wall fronting Nursery Row Park would be removed to allow the

public realm to co-habit with the neighbouring park and create a greater connection between the proposed development and the park. The Orb Street pavement alongside the development would be improved, eliminating the existing dropped curbs and entry points to create a continuous level surface for the length of the building.

82. The landscaping should fall in compliance with the 'Town Centre' designation of the Southwark Street Design Manual in terms of the palette of materials to be used. This includes footways paved with granite natural stone paving slabs with 300mm wide granite kerbs. The repaving of the footway, vehicle crossing, pedestrian crossing, reconstructing of the tree pits, street lighting, and signage to the building will be secured through a highways agreement in the S106.

Layout and functionality

83. The building has entrances onto Rodney Road and Stead Street, activating the main frontage and street corner with Stead Street. A replacement shop further activates the main road. The café and community use have their entrances onto Orb Street, bringing activity to the street and good visual and physical connections with the park opposite. It is notable that there is no internal division at ground floor, with the hotel, café and community activities flowing into one another. Overall, the ground floor has an open, engaging quality that promotes good urban design. At first floor level, the Orb Street elevation is notable for the large picture window opening serving mainly the community use and allowing views out across the adjacent parkland. Details of the entrance doors and the picture window should be confirmed by condition to ensure their quality of design.
84. In terms of functional quality, the layout of the ground and first floors offer good flexibility and ease of access, with flush thresholds and a good-sized lift serving the first floor public use and additional lifts serving the hotel bedrooms above. The ground floor (including retail) has generous internal ceiling heights of 3.6m (soffit) or 3.2m (clear), which should provide sufficient flexibility, whilst the first floor is 2.6m (clear), which is reasonable for an upper floor community use. Above this, the hotel accommodation is shown with 2.5m ceiling heights for the main bedroom spaces, lowering to 2.2m (clear) for the bathrooms and corridor spaces to incorporate services. The building includes extensive plant areas at basement and eighth floor level, with the setback seventh floor terrace providing a green roof, in addition to the numerous planters built into the facades. Details of the rooftop plant enclosure should be confirmed by condition to ensure it remains discreet and hidden within the roof form. Overall, the building shows good functionality and adaptability.

Conclusion on design issues

85. Overall the replacement of the retail parade in this location, with a new building of distinctive architecture that provides a new hotel, community facility and a replacement shop, is supported in design terms. The site is prominent within the local townscape by virtue of the street pattern and open aspect created by setback

building lines and adjacent Nursery Row Park.

86. The new building is large but is scaled well within the context of a variety of low and medium-rise buildings and broad thoroughfare. The massing and bulk are well-handled, with notable cantilevers, soft corners providing for a fluid form. The engaging form is matched by the elevational architecture, comprising brickwork masonry and louvred openings, large picture window and the general transparency of the ground floor. The material palette is high quality. The brickwork forms and patterns providing considerable visual richness.
87. The building will have a confident presence and a landmark quality within the local townscape, where it will form an engaging end-stop to local street views and a notable public building when seen from the park, without appearing too assertive or overwhelming. The development preserves the settings of wider heritage assets. Subject to conditions (façade details, materials, openings and roof finishes), no objection is raised on design grounds.

Other design matters

Designing out crime

88. Policy P16 of the Southwark Plan and Policy D11 of the London Plan require development proposals to reduce opportunities for crime and create and maintain safe internal and external environments.
89. The Design and Access Statement sets out the various ways in which opportunities for crime have been designed-out including:
- creating well lit routes (using Public Rated Lighting where appropriate) with good sight lines;
 - designing-out spaces for anti-social behaviour;
 - installing CCTV and intruder detection systems within the building and the publicly-accessible external spaces;
 - installing card access speed gates and access-controlled doors;
 - staffing the site 24 hours a day with security personnel;
 - designing the cycle store room to be open-plan, well-surveilled and secure;
 - providing secure and well-surveilled short-stay cycle parking; and
 - using retractable bollards within the public realm.
90. The Metropolitan Police's Secure by Design Officer has assessed the proposal and is confident that certification can be attained. To ensure certification achieved, the imposition of a two-part 'Secured by Design' condition is recommended.

Inclusive design

91. Policy D5 of the London Plan requires development proposals to achieve the highest standards of accessible and inclusive design, requiring applications to be supported by an inclusive design statement within the Design and Access Statement. 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

92. London Plan Policy E10 requires 10 per cent of new bedrooms to be wheelchair-accessible or 15% of new bedrooms to be wheelchair-adaptable of British Standards. The proposed development provides 13 out of the proposed 126 guestrooms to be fully wheelchair accessible (10.3%), which therefore meets the criteria in E10.

Daylight/sunlight – community use only

93. An addendum daylight and sunlight report has been submitted in light of the revised BRE Guide 3rd edition published in June 2022, which superseded the 2nd edition 2011 Guide. The assessment is focused on the proposed community use space in accordance with the illuminance method. The assessment concluded that for all applicable room areas served directly by a window (i.e. excluding the gallery space which is expected to be lit artificially) meet a target of 300 lux over 50% of the assessment points for at least half of the daylight hours and 100 lx over 95% of the assessment points. Therefore, demonstrating an acceptable level of daylight provision for the community use at first floor.

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

Daylight and sunlight – neighbours

94. The impact of the proposed development on neighbours' amenity has been a significant concern of local residents. A full daylight and sunlight assessment has been submitted with the application. The report assesses the scheme based on the Building Research Establishment (BRE) guidelines on daylight and sunlight. The conclusions of this state that the reductions in daylight and retained daylight levels are commensurate with this urban locality. Officers have reviewed the daylight and sunlight assessment and note that while there are some impacts on the buildings surrounding the site, these are not unusual within built up town centre locations where buildings of scale are considered to be appropriate.
95. The addendum daylight and sunlight report concludes that the methodology for testing daylight and sunlight impact on neighbouring properties has not been affected by the revised 2022 publication of BRE guidelines. Therefore, no update is required on the original report in this regard.
96. The Daylight and Sunlight assessment considers the impact on daylight for the following buildings:

- Blendon House, Rodney Road
- Mansfield Point, Rodney Road
- Salisbury Estate consented scheme (Car Park site, Balfour Street)
- 61-71 Rodney Road
- 109-119 Rodney Road
- 121-131 Rodney Road
- 133-143 Rodney Road
- Dawes House, Orb Street
- 26-30 Nursery Row

Vertical Sky Component

97. Residential Buildings Assessed	Windows Tested	Non-BRE Compliant	Non-BRE compliant 'Without balcony /soffit' assessment	Compliant
Blendon House, Rodney Road	30	16	11 (36.7%)	19 (63.3%)
Mansfield Point, Rodney Road	9	0	0	9
Salisbury Estate consented scheme (Car Park site, Balfour Street)	41	0	0	41
61-71 Rodney Road	6	0	0	6
109-119 Rodney Road	6	0	0	6
121-131 Rodney Road	6	0	0	6
133-143 Rodney Road	6	0	0	6
Dawes House, Orb Street	68	12	8 (11.8%)	60 (88.2%)
26-30 Nursery Row	9	0	0	9
Total	181 (100%)	28	19 (10.5%)	162 (89.5%)

Table 02: Detailed breakdown of VSC calculations

98. VSC transgressions are entirely based within Blendon House and Dawes House. Both blocks of flats have inset balconies, with balcony walls and projecting balcony soffits which result in more enclosed balcony areas. Where balconies exist on site, the BRE Guidance states that a 'without balconies' assessment provides a more reliable measure of impact from the proposed scheme, as such obstructions can already limit the available skylight. In addition, non-habitable rooms have not been included in the assessment. This includes kitchens less than 13sqm.

Daylight Distribution (No Sky Line)

- 99.

Residential Buildings assessed	Rooms Tested	Non-BRE Compliant (NSL)	Compliant
Blendon House, Rodney Road	15	4 (26.7%)	11 (73.3%)
Mansfield Point, Rodney Road	6	0	6
Salisbury Estate consented scheme (Car Park site, Balfour Street)	29	0	29
61-71 Rodney Road	6	0	6
109-119 Rodney Road	6	0	6
121-131 Rodney Road	6	0	6
133-143 Rodney Road	6	0	6
Dawes House, Orb Street	38	0	38
26-30 Nursery Row	9	0	9
Total	121 (100%)	4 (3.3%)	117 (96.7%)

Table 03: Detailed breakdown of No Sky Line (NSL)

100. In cross-examining the NSL findings for Dawes House, there are no transgressions to the daylight distribution. That means the affected windows share a room with another window, meaning that while the impact on one window might be minor adverse, the impact on the room overall would not be adverse. Therefore, the overall daylight impact on these rooms will be acceptable in consideration to the proposed development.
101. NSL transgressions are entirely based within Blendon House. All other neighbouring units are compliant with BRE standards in relation to NSL calculation, therefore no further assessment will be provided in these instances.

Blendon House

102. Eleven windows will experience a reduction in their VSC levels ranging in a loss of maximum 20%, which is considered noticeable by BRE Guidelines. The remaining VSC levels for windows retain values of between 21.9 and 26.9, therefore minor adverse to the 27% recommended by BRE Guidelines. No windows have a major adverse loss as seen in the breakdown below.
103. With the exception of four bedrooms, all windows with VSC transgressions comply in overall NSL levels. That means they share a room with another window meaning that while the impact on a window might be minor adverse, the impact on the room overall would not be adverse.

104. Vertical Sky Component (VSC) for Blendon House					
Window			Loss		
Total	Pass	BRE compliant	20-30%	31-40%	41% +
30	19	63.3%	11	8	0
No Sky Line (NSL)					
Room	Pass	BRE compliant	20-30%	31-40%	41%+
15	11	73.3%	4	0	0

Table 04: Detailed breakdown of Vertical Sky Component (VSC) and No Sky Line (NSL) for Blendon House

105. Transgressions to NSL against BRE guidelines are limited to four bedrooms at Blendon House (R2 at first to fourth floor). These reductions range from a 66% reduction on NSL for R2 (bedroom) on the first floor, reducing the lit area from 12.41 at existing to 8.5 at proposed. A similar impact is experienced at second, third and fourth floor where NSL levels are reduced by 67% (remaining proposed lit area of 8.63), 69% (remaining proposed lit area of 8.91) and 73% (remaining proposed lit area of 9.34) for the R2 bedroom.
106. These impacts are considered minor adverse with 26.7% of Blendon House windows affected by the development experiencing this non-compliant condition. 96.7% of windows tested are compliant with BRE guidelines as a result of the proposed development. The resultant NSL levels is considered acceptable within an urban context, and BRE guide recognises that daylight is less important to bedrooms.

Annual Probable Sunlight Hours (APSH)

107. Blendon House, Rodney Road, Mansfield Point, Rodney Road, Salisbury Estate consented scheme (Car Park site, Balfour Street), 61-71 Rodney Road, 109-119 Rodney Road, 121-131 Rodney Road and 133-143 Rodney Road had windows located due south and were tested for APSH levels. There are no transgressions to APSH in regards to any of the neighbouring buildings, therefore there will not be a noticeable impact to sun lighting in these rooms.

Overlooking and privacy of neighbouring properties

108. The nearest residential properties are located to the west (Blendon House) and south-east (Dawes House). These are at the greatest risk of overlooking. In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear.
109. The proximity to Dawes House located to the east is within acceptable distances from the proposed development with distances between residential windows

ranging from 25.2m at its most narrow distance to 28.6m. Furthermore, the majority of facade adjacencies are not direct and are at obtuse angles. There is minimal risk of overlooking to Dawes House for this reason.

110. Blendon House is located to the west of the development site within acceptable distances for residential overlooking, these range from 17.8m to 27m distance between windows. Where there is most potential for overlooking issues, the design overcomes this with a solid portion of the facade on every level and no windows. Officers are content that this will ensure no significant overlooking or loss of privacy whilst retaining a suitable level of outlook.

Noise disturbance

111. The use of the site for an increased quantum of commercial floor space and in particular for use as a hotel is not anticipated to result in any significant additional disturbance to residents. People arriving to and leaving the hotel would use Rodney Road which is a thoroughfare. It is noted that servicing will take place from the rear and that this will be an increase on the current servicing requirements of the site however officers, in consultation with the Council's Transport Team and Environmental Protection Team, are satisfied that this would not lead to additional disturbance and can be adequately controlled by conditions.
112. A CEMP was produced by Legendre was submitted and reviewed by EPT. The plan is comprehensive and contains measures that if applied in accordance with the relevant legislation, would minimise the impact of the development on the existing environment. The developer is to liaise with Environment Protection Team to agree on the monitoring locations and S61 of the Control of Pollution Act 1974 consent.

Transport and Highways

Existing site context

113. The footway adjoining this site on Rodney Road is wide and connects westerly to Elephant & Castle train/tube station and southerly to the pedestrian routes through the nearby Burgess Park. This footway also joins with the bus stops on this road. There are existing highway safety measures around this site in the form of raised entry treatment at the junctions of Stead Street with Orb Street and Rodney Road plus a raised table at the entry point of the pedestrian/cycle route in the adjoining Nursery Row Park on Stead Street.
114. There is a two-way cycle route on Rodney place/Rodney Road. Cycleway 17 also runs close to this site at its western side on Brandon Street. The applicant has retained the existing generous public realm abutting the northern and western peripheries of this site on Rodney Road/Stead Street and proposed a servicing bay on the adjacent section of Rodney Road plus six pedestrian entrances distributed across the Orb Street, Rodney Road and Stead Street frontages of this development as detailed on Plan No. RR-P-20-0G-01-01/P4.

Trip generation

115. The applicant's Transport Statement predicts that the development would result in 44 additional trips one way at AM peak and 58 additional trips one way at in PM. 4 of these would be as a passenger in a car or van. The remaining trips would be using sustainable forms of transport.

Mode	AM Peak		PM Peak	
	(08:00 - 09:00)		(17:00 - 18:00)	
	Arrive	Depart	Arrive	Depart
Underground, metro, light rail or tram	+4	+4	+4	+7
Train	+3	+8	+3	+6
Bus, minibus or coach	+8	+19	+8	+14
Taxi	0	0	0	0
Motorcycle, scooter or moped	0	+1	0	+1
Driving a car or van	0	0	0	0
Passenger in a car or van	+1	+1	+1	+1
Bicycle	+1	+3	+1	+2
On foot	+4	+10	+4	+8
Other method of travel to work	0	0	0	0
Total	+21	+23	+20	+38

Table 2: (above) Net increase in person trips between existing and proposed uses.

Time Period	Total Person Trips		
	Arrivals	Departures	Two-way
AM Peak	31	32	63
PM Peak	28	47	75

Table 3: (above) Proposed combined person trips as a result of the new development.

116. Notwithstanding some different estimates in terms of taxi use, the Transport Policy Team are satisfied that the proposed levels of vehicular traffic would not have an adverse impact on the local highway network.

Car parking

117. The proposed development is within an area of high public transport accessibility and therefore should be car-free with the exception of parking for disabled persons. Walworth CPZ provides parking control in this location weekdays from 0830hrs to 1830hrs. There is an existing disabled car parking bay on Rodney Road adjacent to the site to be retained as part of the development, in addition to a new A disabled bay to be provided on Orb Street adjacent to existing permit parking bays. A condition is recommended to ensure the applicants submit details of the proposed disabled car parking space, equipped with active electric vehicle charging points.

Cycle parking

118. The applicant has proposed long stay cycle parking spaces in the basement for use by the hotel and community floor space. In addition, short stay parking spaces will be provided in the form of Sheffield stands at street level. A minimum of 2 disabled spaces and 1 Cargo bike space is to be provided. The cycle parking is recommended to be secured by condition.

Improving access to cycle hire options

119. Given that the hotel would introduce new employment and visitors to the site, the applicant has agreed to contribute £45,000 towards the provision of an enlarged TfL (Santander) docking station within the vicinity of the site. This will be secured in the Section 106 Agreement, this contribution would meet the requirements of Policy T5 of the London Plan 2021 and Policy P53 of the Southwark Plan.

Improvements to local footway and highway environment

120. The footways on Orb Street, linking to the alternative busy bus route on Walworth Road, are substandard with uneven surface and broken pavement slabs that require renewal. It is also observed that vehicles generally speed over the adjacent zebra crossing on the eastern side of Rodney Road, Stead Street, Balfour Street junction, when no pedestrians are immediately visible to the drivers. This is due to ineffective traffic calming measures associated with this facility. Therefore, it is necessary to upgrade this to a raised pedestrian crossing. These highways improvements measures would be secured through the s278 legal agreement.

Servicing and deliveries

121. It is proposed that the servicing of the development would take place on the prevailing car parking bays on the adjacent segment of Rodney Road. The submitted Delivery and Servicing Plan (DSP) is proposed to be revised to include restricting deliveries also during school arrival and departure times of 1500hrs to 1600hrs and consolidation of deliveries and, confirm that this development's management would engage only the services of transport operators who have attained at least 'Silver' membership of Freight Operators Recognition Scheme (FORS).
122. A DSP and a CMP would be secured by condition and should be prepared in line with TfL guidance.

Refuse

123. The refuse and recycling bin store would be positioned in the basement of the development, as shown on Plan No. RR-P-20-B1-01-01/P4. It is unclear where the temporary refuse bin holding space would be given the position of the refuse bins in the basement. This should be confirmed through a condition in consultation

with the Council's Waste Management Team.

Ecology, biodiversity and green infrastructure

124. A bat survey (September 2020 by PJC Consultancy ref: 4382E/20) and an Ecological Appraisal (September 2020 by PJC Consultancy ref: 4279E/20) has been provided for the site and found acceptable by the LBS Ecologist. Details of the green roof and ten swift bricks to be installed on site are to be secured by condition.
125. Policy G5 of the London Plan 2021 states that urban greening should be a fundamental element of site and building design. It recommends that major developments which are predominantly commercial achieve an Urban Greening Factor (UGF) score of 0.3.
126. The proposed development would achieve an urban greening factor of 0.43. This would be achieved through a combination of:
- flower-rich perennial planting, hedges and groundcover planting of 21 sqm
 - extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) for at least 265sqm
127. Southwark Plan Policy P59 requires major development to provide green infrastructure with arrangements in place for long term stewardship and maintain acne funding. It is considered that the green infrastructure potential at the site has been maximised through the creation of biodiverse green roof along with tree planting and species rich planting areas. The Council's Urban Forester and the Council's Park and Leisure Team are satisfied that high quality spaces would be delivered. Details are to be secured through condition of the planters and how they will be maintained to ensure feasibility, including cross sections, soil volumes, planting schedules and automated or other grey water recycling irrigation.

Environmental matters

Energy use

128. Policy SI2 of the London Plan and Policy P70 of the Southwark Plan require major developments to be net carbon zero and provide an assessment of their energy demands demonstrating that the appropriate steps have been taken to reduce energy demand and usage in accordance with the energy hierarchy. Policy P70 of the Southwark Plan requires a minimum of 40% on site carbon reductions to be achieved above 2013 Building Regulations Part L for non-residential developments.
129. An Energy Statement and amended Energy Strategy response, based on the energy hierarchy, has been submitted by the applicant. This details how the targets for carbon dioxide emissions reduction are to be met by the development. A combination of 'Lean' and 'Green' (but no 'Clean') measures have been employed in an attempt to achieve on site carbon reductions.

130. The proposal would reduce on-site regulated carbon dioxide emissions by 59.8% over a notional building minimally compliant with the Building Regulations 2013. The cumulative on-site savings equate to 147.1 tonnes of carbon dioxide. The building will produce 99.0 tonnes of carbon dioxide after the carbon saving technologies are installed calculated under the SAP 10. The carbon offset requirement is £95 per tonne carbon for a 30 year period and the required payment would be £282,300.

Be Lean – energy efficient design and construction

131. The development proposes to incorporate a range of passive and active measures to meet Part L requirements for energy efficient design. The proposed passive measures include:

- high thermal envelope performance to reduce uncontrolled heat transfer through the building fabric (and improve the effectiveness and energy use of the mechanical ventilation system);
- use of thermal mass and high ceilings to manage the heat within the building;
- optimisation of the g-value of the proposed replacement glazed wall system to provide a balance between minimising heat gain and maximising natural daylight (to reduce lighting energy);
- solar shading fitted to the building's exterior to limit the ingress of summertime solar gains; and
- highly insulated green roofs.

132. The proposed active measures include:

- high efficiency ventilation systems including heat recovery on mechanical ventilation and air handling plant;
- low energy and high efficacy lighting systems (at least 120 luminaire lm/cW), fittings and controls (e.g. occupancy sensors);
- control systems to monitor and operate the plant and equipment as efficiently as possible; and
- pumps and fans with built-in variable speed drives and sensor, allowing them to respond to variable building loads.

133. The reduction in regulated carbon emissions achieved through these 'demand reduction' measures is proposed to be 7% above 2013 Building Regulations

134. It has not been possible to meet the GLA's target for a minimum 15% reduction in carbon emissions over Part L 2013 at the Be Lean stage of the hierarchy. Nearly 76% of the energy demand is attributed to the generation of hot water, which is much higher than other non-domestic uses, making it more difficult to achieve savings at the Be Lean Stage.

Be Clean – low carbon energy supply

135. The application site is not within an area identified for an existing or planned decentralised heat network. The development is proposed to be future-proofed to allow for connect to a community heat network should this be developed in the

future. This includes through:

- Space within the hot water plant room for future community energy interfacing heat exchanger, pumps, controls etc.
- Provision to allow future community energy connecting pipework to be routed through from outside
- Spare ways on local electrical distribution boards for future electrical supplies to pumps, controls etc.

136. The proposed energy system for the site will incorporate air source heat pumps. The proposed carbon savings for this type of energy supply is calculated at the Be Green stage of the hierarchy. Therefore, no carbon savings are achieved for this step of the Energy Hierarchy.

Be Green – renewable energy generation and storage

137. An assessment of potential on site renewable energy systems was undertaken. This discounted options for a biomass boilers, photovoltaics, solar thermal systems, or ground source heat pumps due to conflicting development proposals, site specific constraints and environmental considerations.

138. Therefore, the development proposes the use of renewable technologies in the form of an air source heat pump (ASHP) only. The ASHP's would provide 100% of the heating and cooling required for the development. This step of the energy hierarchy would achieve a total carbon reduction of 52.8% above the 2013 building regulations.

Be Seen – monitoring, verifying and reporting energy performance

139. 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 actual operation. In respect of 'Be Seen' measures these will be secured by condition an could include:

- conducting a predicted operational energy use analysis (TM54 modelling) during the design stage and then measuring actual operational energy use once the development is in use, benchmarked against the in-design analysis;
- using full metered electricity and water supplies; and
- using sub-meters to measure electricity, heating and cooling energy use (linked to the building owner's Building Energy Management System), which would feedback energy consumption to each user group/ functional space/tenancy within the development.

Overheating

140. Policy SI4 of the London Plan and Policy P68 of the Southwark Plan set out the cooling hierarchy that should be followed when developing a cooling strategy for new buildings. The energy statement sets out the following measures for reducing the risk of overheating, in accordance with the cooling hierarchy:

- Minimise internal heat generation through energy efficient design including minimising cold bridging, minimising heat loss from heating and hot water systems, low energy lighting, energy efficient desktop PCs, laptops, screens, energy efficient appliances
- Reduce the amount of heat entering the building in the summer through improved fabric 'U' values, improved air tightness, optimisation of glazing g-value, optimisation of glazing area, internal blinds
- Manage heat within the building through high ceilings
- Mechanical ventilation with high efficiency heat recovery
- Active cooling VRF systems to provide cooling to all area expected to achieve a seasonal cooling efficiency of +6.78

BREEAM

141. Policy P69 of the Southwark Plan requires the development to achieve a BREEAM "excellent" rating. A BREEAM Pre-assessment report has been undertaken which reports a figure of 76.95. It demonstrates that "excellent" can be achieved for the commercial use types and a condition is to be applied to secure this.

Ground conditions and contamination

142. The Environment Agency have reviewed the document 'Phase 1 Contaminated Land Assessment' by Geosmart (ref: 72986R2 dated August 2020). Although the report indicates the potential for contamination in the ground, much of this is proposed to be removed during basement construction. There is no objection made.

Air quality

143. Air quality impacts have been assessed as part of the Air Quality Assessment submitted by Hawkins dated September 2020. This includes:
- Impacts on air quality arising from the construction project;
 - Impacts from the completed and operational development; and
 - Suitability of the site for the proposed uses.
144. During the construction phase it is recognised that there could be impacts such as dust in the air as well as dust and dirt on the highway as a result of construction vehicle movements. This can be suitably managed and mitigated through a Construction Environmental Management Plan which would be a conditioned requirement of any consent issued. The impact of construction vehicle traffic emissions is not considered to be significant and the site is designated as 'Low Risk'.
145. In terms of the completed and operational development, the predicted annual mean concentrations of NO₂ and particulate matter have taken into account emissions generated by road traffic and energy plant with the result being that no significant air quality effects have been identified at any of the existing surrounding

receptors. The site does not exceed annual mean Air Quality objective (AQO), with the exception of nitrogen dioxide (NO₂) and hourly exceedances of AQO are not expected to occur. Proposed Mechanical Ventilation with Heat Recovery systems sufficiently mitigate and will be secured by condition. The development can be considered 'Air Quality Neutral' in terms of building emissions.

146. Given that the air quality for future users of the proposed development would be acceptable, the site is considered to be suitable for the range of uses being proposed.

Flood Risk, resilience and safety

147. A Basement Impact Assessment, Flood Risk Assessment and Drainage Strategy were provided as part of the submitted documents. The site is located within Flood Zone 3, which is an area at high risk of flooding due to the proximity of the tidal River Thames. However the site is protected by the Thames Barrier and related defences.
148. The proposal seeks to introduce sleeping accommodation on the second floor of the development, which will be above the 2100 breach flood level. A revised FRA was provided, dated August 2021 (ref: 14125) by Ivory Group, following comments from the Flood Risk Management team and would be secured by condition.
149. The Environment Agency did not object to the submitted proposal, Thames Water requested consultation with Thames Water to establish an agreed position for connecting to the water network, which has been added as an informative. The Flood Risk management team had no objection in principle as 'more vulnerable' uses were placed at second floor and above.
150. A condition requiring further information on BIA, emergency evacuation, SUDS, and proposed floor finishes have been recommended as conditions. A drainage details condition to include clarify attenuation volume figures listed in the SUDS proforma has been included.

Light pollution

151. LBS Highways team have advised that street lighting is to be upgraded to current LBS standards (including on private roads). An investigation into the possibility to provide lamp columns mounted to the building walls in order to improve effective footway widths is recommended as part of this and all lighting should be designed to minimise light spillage onto park land with particular regard to bats and nocturnal birds. The final proposals will be agreed through the Final Lighting Strategy, to be approved by the Local Planning Authority prior to first occupation of the building. This will be secured by condition.

Construction management

152. EPT reviewed Legendre CEMP. The plan is comprehensive and contains measures that if applied will minimise the impact of the development on the

existing environment. The developer is to liaise with Environment Protection to agree on the monitoring locations and S61 of the Control of Pollution Act 1974 consent.

153. It is noted the applicant has provided a framework Construction Management Plan (CMP). However, this should contain a swept path analysis of vehicle movements on site, the quantity of vehicles on site at each phase of construction and the vehicle routing displayed on a map. An amended construction management plan will be secured by condition.
154. The submitted construction management plan will need to be revised to include confirmation of whether or not any of the adjacent car parking bays would be suspended, agreeing crane installation method with the Council, plans showing safe diversion of pedestrians during the closure of the adjoining footways plus routing of construction lorries, penalties relating to delivery vehicles not complying with scheduled delivery times and not adhering to the agreed routing of vehicles, positions of wheel washing facilities and site management car/cycle parking provision
155. 'Balfour Street' bus stop should not be impacted during the construction of the development. Appropriate measures should be identified to prevent adverse impact on bus operations. Cycle Superhighway 2 runs along Rodney Road, as such, neither construction materials nor vehicles should block the safety and function of the cycleway.
156. In order to ensure that increases in traffic, noise and dust associated with the demolition and construction phases of the development are minimised, Final Environmental Management Plans and Final Logistics Plans are to be required by condition.

Noise and vibration

157. A noise and vibration impact assessment was submitted by Hawkins Environmental noise assessment report (ref: H3042 rev 3) dated September 2020 and updated (rev 4) 17 November 2020. The study shows that noise from surrounding roads and the wider environment make it "High Risk" and sufficient mitigation is required. The methods to reduce noise include the provision of suitable glazing and ventilation, which will be secured through condition. Based on the results of the assessment, EPT is satisfied that using the recommended treatment to façade and acoustic design the Council noise criteria can be met, and will be conditioned.

Fire Safety

158. Policy D12 (A) of the London Plan (2021) requires that all development must submit a planning fire safety strategy as part of a Fire Statement. The fire safety strategy should address criteria outlined in Policy D12 (A).
159. A Fire Statement (ref LO20077 dated 29 September 2021 by OFR) was submitted with the application. The statement covers matters required by planning policy.

This is in no way a professional technical assessment of the fire risks presented by the development. Fire safety measures within the statement include:

- an evacuation strategy;
- commitment to providing one firefighting shafts;
- commitment to upgrading fire safety measures throughout, to include high levels of compartmentation, sprinklers, fire alarms and PRM refuges;
- confirmation of compliance with Building Regulations Approved Document B;
- explanation of how the internal layout would achieve compliant travel distances.

160. The fire services would gain vehicular access to the site depending on which core the firefighters need to enter. This building can be accessed via Rodney Road Stead Street and Orb Street and the pumping truck would be expected to park within the drop-off areas.
161. 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.
162. The Fire Statement was produced by fire risk engineering consultancy OFR Group. A certified fire risk engineer (a Fellow of the Institute of Fire Engineers) has checked and approved the contents.

Socio-economic impacts

163. London Plan Policy E11 and Southwark Plan Policy P27 require development proposals to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases. The methodology for securing these opportunities prescribed by the Council’s Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015 with 2017 Addendum).
164. In accordance with the policy framework, there would be a requirement for this development to deliver 11 sustained jobs during the construction phase to unemployed Southwark residents, 11 short courses, and 3 construction industry apprentices. Upon completion, 13 sustained jobs for unemployed Southwark Residents would also be required. These obligations will be secured through the Section 106 Agreement.
165. In terms of direct employment, the proposed uplift in hotel and retail floor space has the potential to deliver 32 FTE positions. The workers would also generate considerable spend in shops and services in the local area, which is a major and enduring benefit of the development.

Planning obligations (S.106 undertaking or agreement)

166. 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

167. Following the adoption of Southwark's Community Infrastructure Levy (SCIL) on 1 April 2015, much of the historical toolkit obligations such as Education and Strategic Transport have been replaced by SCIL. Only defined site specific mitigation that meets the tests in Regulation 122 can be given weight. 293.

168. The following obligations are required for this scheme and would be included in the legal agreement:

Planning Obligation	Mitigation	Agreed?
Transport impact mitigation		
TfL DOCKING STATION CONTRIBUTION	£45,000 to contribute towards expansion of the TfL cycle docking station scheme in the vicinity of the site	Yes
Local Economy: Employment and Training		
CONSTRUCTION PHASE JOBS/ CONTRIBUTIONS	<p>Development to:</p> <ul style="list-style-type: none"> • Deliver 11 sustained jobs to unemployed Southwark residents, • Deliver 11 short courses, and; • Take on 3 construction industry apprentices during the construction phase. <p>Or make the pro-rata Employment and Training Contribution which, at maximum, would be £51,950 This breaks down as:</p> <ul style="list-style-type: none"> • £47,300 against sustained jobs; • £1,650 against short courses, and; • £3,000 against construction industry apprenticeships. 	Yes
CONSTRUCTION PHASE EMPLOYMENT, SKILLS AND	<p>The Plan would be expected to detail:</p> <ul style="list-style-type: none"> • Methodology of training, skills, support etc. 	Yes

BUSINESS SUPPORT PLAN	<ul style="list-style-type: none"> • Targets for construction skills and employment outputs • Methodology for delivering apprenticeships • Local supply chain activity methodology 	
POST-COMPLETION (IN-USE) PHASE JOBS AND TRAINING	<p>The development is to deliver 13 sustained jobs to unemployed Southwark residents,</p> <p>Any shortfall is to be met through the End Use Shortfall Contribution which, at maximum, would be £55,900. This is calculated on the basis of £4,300 per job.</p>	Yes
POST-COMPLETION (IN-USE) PHASE JOBS/ CONTRIBUTIONS	<p>The Plan would be expected to detail:</p> <ul style="list-style-type: none"> • Methodology for filling the Sustained Employment Opportunities (SEOs) and apprenticeships roles • Milestones and profiles for filling the SEOs and apprenticeships • Identified skills and training gaps to gain sustained employment in the completed development <p>- Methods to encourage applications from suitable unemployed Borough residents by liaising with the local Jobcentre Plus and employment service providers</p>	Yes
Highway Impacts Mitigation		
SCOPE OF WORKS	<p>Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer is to submit the s278 specification 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> <ol style="list-style-type: none"> 1. Repave the footway including new kerbing fronting the development on Rodney Road, Stead Street & Orb Street in accordance with the Southwark Streetscape Design Manual (SSDM) standards. 2. Reconstruct any redundant vehicle crossovers fronting the development as footway in accordance with the SSDM standards. 3. Reconstruct any existing tree pits fronting the development in accordance with the SSDM standards. 4. Improve pedestrian crossings in Rodney Road 	Yes

	<p>and Orb Street and adjust Nursery Row Park grass to meet pavement level.</p> <p>5. Upgrade street lighting to current LBS standards (including on private roads). Investigate the possibility to provide lamp columns mounted to the building walls in order to improve effective footway widths. Please contact Perry Hazell at Perry.Hazell@southwark.gov.uk for further details.</p> <p>6. Review existing and proposed signage fronting the development and investigate the possibility to install any existing / proposed signs on the building walls in order to improve effective footway widths.</p> <p>6. Provide appropriate dropped kerbs for refuse bin collection.</p> <p>7. Promote a TRO to amend any parking arrangements. Works to include road marking and signage (if required).</p> <p>8. Refresh road markings following kerb installation.</p> <p>9. Rectify any damaged footways, kerbs, inspection covers and street furniture due to the construction of the development to the appropriate materials as specified in our regulating plan and materials palette.</p>	
S278 AGREEMENT	Prior to commencement of the agreed highway works, the developer is to enter into a Highway Agreement under Section 278.	Yes
Publicly-accessible Realm		
DETAILED DESIGN	<p>Prior to implementation, the developer is to submit a Public Realm Specification for all areas of publicly-accessible realm to the Local Planning Authority and receive its approval. The Public Realm Specification shall demonstrate that the publicly-accessible realm has been designed to an adoptable standard (in accordance with the SSDM) and shall comprise:</p> <ul style="list-style-type: none"> • detailed drawings (plans, sections, levels etc.); • details of street furniture (cycle stands, seating, bollards etc.); • details of planting; • details of external lighting and CCTV; • details of boundary enclosure and entry gates; • finishes schedules and samples of proposed materials; • demonstration that principles of Secured by Design have been incorporated; and 	Yes

	<ul style="list-style-type: none"> details of the phasing and timing for delivery. 	
DELIVERY AND SHORT-TERM MANAGEMENT	<p>Upon receipt of a Provisional Completion Certificate from the Local Planning Authority, the developer shall open the publicly-accessible realm.</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>	Yes
Energy and Sustainability		
Carbon offset payment	<p>The shortfall in carbon zero reductions on site is charged at £2,850 per tonne of carbon dioxide, based on £95 per tonne calculated over 30 years.</p> <p>The onsite reduction achieved is 59.8% over Part L which equates to 147.1 tonnes of carbon dioxide. The remaining 99 tonnes of carbon dioxide to be offset requires a payment of £282,150 to the Green Buildings Fund.</p>	
FUTUREPROOFED CONNECTION TO DISTRICT CHP	Prior to occupation, a CHP 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 CHP.	
REVIEW OF INSTALLED ENERGY MEASURES	<p>Post-installation review to verify the carbon savings delivered with an upwards only adjustment to the carbon offset fund contribution if required.</p> <p>Applicant's Position: Agreed</p>	
Other		
Reduced rents and fit-out to support community use	A contract specifying an initial ten-year commitment for the Arts Network to occupy the space at a subsidised rent, including fit out costs, and then at a reduced rate (market rate minus 30%) thereafter.	
Business relocation strategy	Support a continuity of service for the existing mini market (98 Rodney Road)	

Hotel management plan	Management plan for day-to-day operation of the hotel including the external spaces	
Community use agreement	To secure use of the ancillary facilities in the Main Block for members of the public outside of working hours in accordance with the details provided earlier in the report	
Administration	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: Agreed	

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

170. In the event that a satisfactory legal agreement has not been entered into by 4 April 2023, it is recommended that the director of planning and growth refuses planning permission, if appropriate, for the following reason:

“The proposal, by failing to provide for appropriate planning obligations secured through the completion of a S106 agreement, fails to ensure adequate provision of employment and training contributions, and mitigation against the adverse impacts of the development through projects or contributions that is contrary to Southwark Plan policy IP3 (‘Community Infrastructure Levy (CIL) and Section 106 Planning Obligations’), Policy DF 1 Planning Obligations of the London Plan (2021) and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015)”.

Mayoral and borough community infrastructure levy (CIL)

171. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material ‘local financial consideration’ in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport invests in London as a whole, primarily Crossrail. Southwark’s CIL will provide for infrastructure that supports growth in Southwark.

172. In the event that an agreement has not been completed by 1st March 2023, the Committee is asked to authorise the Director of Planning to refuse permission, if appropriate, for the following reason:

173. In the absence of a signed S106 legal agreement there is no mechanism in place

to mitigation against the adverse impacts of the development through contributions and it would therefore be contrary to Southwark Plan 2022 policy IP3 ('Community Infrastructure Levy (CIL) and Section 106 Planning Obligations'), Policy DF 1 Planning Obligations of the London Plan (2021) and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015).

174. The site is located within Southwark CIL Zone 2 and MCIL2 Band2 zone. Based on the existing floor areas provided in the agent's CIL Form1 dated 01-Oct-20 and proposed areas in Area Schedule P4 (29.09.21), the gross amount of CIL is approximately £951,476.27 consisting £280,567.64 of Mayoral CIL and £670,908.63 of Borough CIL. It should be noted that this is an estimate, and the floor areas will be checked when related CIL Assumption of Liability Form is submitted after planning approval has been obtained.

Community involvement and engagement

175. This application was accompanied by a Statement of Community Involvement. The documents confirm that the following public consultation exercises were undertaken by the applicant prior to submission of the application:
- 22nd July 2020 and 25th July 2020 - Public exhibition
 - 16th, 17th, 18th, 19th and 21st December 2020 – Open workshop 1
 - 6th, 13th, 19th and 26th February 2021 - Open workshop 2
176. Meetings with Councillors included:
- 14th May 2020 Cllr Rebecca Lury and Cllr Derren Merrill
 - 10/03/20 Cllr Johnson Situ
 - 31/10/19 Cllr Johnson Situ, Cllr Rebecca Lury and Cllr Derren Merrill
177. Meetings with Community Groups and neighbouring residents
- 24/2/20 Friends of nursery row park
 - 11/2/20 Rodney Road Tenants and Residents Association
 - 6/2/20 Walworth Society
 - 19/9/20 Blendon House residents
 - 19/8/20 Dawes House Residents
178. Meeting with Local businesses and current occupiers of the site
- 16/12/19 and 22/7/20 Diogenes and the Dog
 - 26/2/20 and 25/7/20 Tigris Supermarket
179. Issues and requests raised as result of the public consultation included:
- Suitability of hotel use on site
 - Height of the development and the impact on adjoining properties and Nursery Row Park
 - Relocation of existing businesses on site
 - Strong support for the provision of community resource centre
 - Strong support for reconfiguration of green space associated with Nursery Row Park

- Questions about the opening hours of the hotel bar and hours of operation during construction

180. The SCI also includes details of how the proposed development would be in keeping with the Walworth Social Regeneration Plan Promise.
181. As part of its statutory requirements, the Council sent letters to surrounding residents, issued a press notice publicising the planning application and displayed notices in the vicinity of the site. Adequate efforts have, therefore, been made to ensure the community has been given the opportunity to participate in the planning process.
182. Details of consultation undertaken by the Local Planning Authority in respect of this application are set out in the appendices. The responses received are summarised in an earlier part of this report. The main 'Assessment' part of this report addresses the issues raised.

Consultation responses from external and statutory consultees

183. Summarised below are the material planning considerations raised by external consultees, within the relevant sections of the report.
184. Environment Agency, Thames Water and TFL have no objection to the proposed development given necessary conditions to attach to any grant of planning permission.

Consultation responses from internal consultees

185. Summarised below are the material planning considerations raised by internal and divisional consultees including (Design and Conservation, Transport Policy, Urban Forester, Archaeology, Ecology, Highways Development, Flood Risk Management).
186. All consultees recommend grant of planning permission subject to the conditions, which have been included in the decision notice. Detailed consideration of comments have been included in the relevant sections of this report.

Community impact and equalities assessment

187. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights
188. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application. The development would have a significant benefit for wheelchair users as it would provide a facility designed for a particular need but accessible for other users too.
189. 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.
190. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.
191. The proposals would result in the displacement of some business users. The applicant has provided letters of intent confirming the business user's intentions to cease trade or be retained as part of the development. These strategies will be secured through the S106.
192. The new development would provide accessible hotel accommodation and facilities for people with disabilities. The development would also provide training and employment opportunities in an area with a relatively high BAME population and would be likely to benefit those protected groups.

Human rights implications

193. 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.
194. This application has the legitimate aim of delivery a nine-storey plus basement building for 126 hotel guestrooms with café, community and retail use. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

Positive and proactive statement

195. The council has published its development plan and Core Strategy on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
196. The council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the development plan and core strategy and submissions that are in accordance with the application requirements.
197. **Positive and proactive engagement: summary table**

Was the pre-application service used for this application?	YES
If the pre-application service was used for this application, was the advice given followed?	YES
Was the application validated promptly?	YES
If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	YES
To help secure a timely decision, did the case officer submit their recommendation in advance of the agreed Planning Performance Agreement date?	YES

CONCLUSION

198. The principle of a hotel and community use is acceptable in this location. The development is in an appropriate location for a tall building, being located within a CAZ and with sufficient surrounding amenity space. Officers are satisfied that the proposal is of the highest architectural standard, and that the proposal provides an appropriate response to context and would not harm the character or setting of any nearby conservation areas or listed buildings. Careful consideration has been given to the impact of the proposal on townscape views, and the impact of the increased height is not considered to cause harm to nearby heritage assets or surrounding conservation areas.
199. Having regard to all the policies considered and any other material planning considerations it is recommended that planning permission is granted subject to conditions and the completion of a legal agreement.

BACKGROUND INFORMATION

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file 1088-C Application file 20/AP/2953 Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 0254 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Recommendation (draft decision notice)
Appendix 2	Relevant Planning Policies
Appendix 3	Consultation undertaken
Appendix 4	Consultation responses received

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth	
Report Author	<u>Gemma Perry, Planning Officer</u>	
Version	Final	
Dated	4 October 2022	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
Date final report sent to Constitutional Team		5 October 2022

Appendix 1: Recommendation

This document shows the case officer's recommended decision for the application referred to below.

This document is not a decision notice for this application.

Applicant	Elephant And Castle Projects Ltd	Reg. Number	20/AP/2953
Application Type	Major application		
Recommendation	GRANT permission	Case Number	1088-C

Draft of Decision Notice

Planning permission is GRANTED for the following development:

Redevelopment of 98-104 Rodney Road for a 9 storey (plus basement) building for hotel (126 bedrooms) , cafe, community use, retail use and associated cycle/disabled parking, plant and landscaping.

98-104 Rodney Road London Southwark

In accordance with application received on 9 October 2020 and Applicant's Drawing Nos.:

Existing Plans

Proposed Plans

ELEVATION 01 DEMOLITION PLAN RR-D-25-MF-01-01 REV P1 received
09/10/2020

ELEVATION 02 DEMOLITION PLAN RR-D-25-MF-01-02 REV P1 received
09/10/2020

ELEVATION 03 DEMOLITION PLAN RR-D-25-MF-01-03 REV P1 received
09/10/2020

ELEVATION 04 DEMOLITION PLAN RR-D-25-MF-01-04 REV P1 received
09/10/2020

PROPOSED ELEVATION 05 RR-P-25-MF-01-05 REV P3 received 09/06/2021

PROPOSED ELEVATION 04 RR-P-25-MF-01-04 REV P3 received 09/06/2021

PROPOSED ELEVATION 03 RR-P-25-MF-01-03 REV P3 received 09/06/2021

PROPOSED ELEVATION 02 RR-P-25-MF-01-02 REV P3 received 09/06/2021

PROPOSED ELEVATION 01 RR-P-25-MF-01-01 REV P3 received 09/06/2021

GROUND LEVEL PROPOSED FLOOR PLAN RR-P-20-OG-01-01 REV P4 received
30/09/2021

LEVEL 01 PROPOSED FLOOR PLAN RR-P-20-01-01-01 REV P4 received
30/09/2021

LEVEL 02 PROPOSED FLOOR PLAN RR-P-20-02-01-01 REV P4 received
30/09/2021

TYPICAL LEVEL 03-07 PROPOSED FLOOR PLAN RR-P-20-03-01-01 REV P4
received 30/09/2021

TYPICAL LEVEL 08 PROPOSED FLOOR PLAN RR-P-20-08-01-01 REV P4 received
30/09/2021

BASEMENT LEVEL PROPOSED FLOOR PLAN RR-P-20-B1-01-01 REV P4 received
30/09/2021

Other Documents

GROUND FLOOR DEMOLITION PLAN RR-D-20-OG-01-01 REV P1 received
09/10/2020

TREE PROTECTION PLAN FINAL 4520/01/19-1162 REV V2 received 23/08/2021

TREE CONSTRAINTS PLAN 4520/01/19-1160 REV V1 received 23/08/2021

PROPOSED SCHEMATIC SECTION 04 RR-P-26-MF-01-04 REV P3 received
09/06/2021

PROPOSED SCHEMATIC SECTION 03 RR-S-26-MF-01-03 REV P3 received
09/06/2021

PROPOSED SCHEMATIC SECTION 02 RR-S-26-MF-01-02 REV P3 received
09/06/2021

PROPOSED SCHEMATIC SECTION 01 RR-S-26-MF-01-01 REV P3 received
09/06/2021

PROPOSED SITE PLAN RR-P-00-05-01-01 REV P4 received 30/09/2021

PROPOSED ROOF PLAN RR-P-20-OR-01-01 REV P4 received 30/09/2021

BACK-FILLED LEVEL PROPOSED WATER TANK ARRANGEMENT RR-P-20-MF-
01-01 REV P4 received 30/09/2021

Time limit for implementing this permission and the approved plans

1. 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.

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

2. 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; The Southwark Plan 2022: P55 Protection of amenity; P13 Design Quality; P14 Design of Places and P56 Biodiversity.

3. No works (except for demolition and site clearance) shall commence until full details of the proposed surface water drainage system incorporating the Sustainable Drainage Systems (SuDS) have been submitted to and approved in writing by the Local Planning Authority, including detailed design, dimensions, depth and location of attenuation units and details of flow control measures. The strategy should achieve a reduction in surface water runoff rates during the 1% Annual Exceedance Probability (AEP) event plus climate change allowance as detailed in the 'Flood Risk Assessment & Drainage Strategy' prepared by Tully De'Ath (dated September 2020, ref: 14125), as well as including the provision of biodiverse green roofs. The applicant must confirm that the site is safe in the event of blockage/failure of the system, including consideration of exceedance flows. The site drainage must be constructed to the approved details.

Reason: To minimise the potential for the site to contribute to surface water flooding in accordance with Southwark's Strategic Flood Risk Assessment (2017) and P68 (reducing flood risk) of the Southwark Plan 2022

4. To the exclusion of demolition and site clearance, once ground water levels are identified by on site ground investigation and prior to the beginning of works, the applicant shall submit an update to the Basement Impact Assessment to and be approved in writing by the Local Planning Authority. The update should include an assessment of the continuation and fluctuations of groundwater flows, and whether the lowest point of the basement is above, or below the recorded groundwater levels recorded from the ground investigations, and any mitigation measures required. The development and mitigation measures shall be carried out in accordance with the approved details. Further details on preparation of BIA's for flood risk can be found in appendix to Southwark's 2016 SFRA:
<https://www.southwark.gov.uk/environment/flood-risk-management/strategic-flood-risk-assessmentsfra?chapter=2>

Reason: To minimise the potential for the site to contribute to changes in groundwater conditions and any subsequent flooding in accordance with the Southwark Strategic Flood Risk Assessment (2017); And to minimise the potential for the site to contribute to surface water flooding in accordance with P68 reducing flood risk of the Southwark Plan 2022, and guidance in the

Sustainable Design and Construction SPD (2009)

5. No development shall take place, excluding demolition and site clearance, until a final Construction and Environmental Management Plan and Logistics Plan has been submitted to and approved in writing by the Local Planning Authority. This Plan 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. This Plan shall be in accordance with the details provided in the Construction Management Plan (prepared by Legendre dated September 2020) hereby approved and must also include the following information:

(1) A swept path analysis of vehicle movements on site, the quantity of vehicles on site at each phase of construction and the vehicle routing displayed on a map

(2) Confirmation of whether any adjacent car parking bays would be suspended during construction

(3) A crane installation method

(4) Plans showing safe diversion of pedestrians during the closure of the adjoining footways

(5) Routing of construction lorries

(6) Penalties relating to delivery vehicles not complying with scheduled delivery times and not adhering to the agreed routing of vehicles

(7) Positions of wheel washing facilities and site management car/cycle parking provision

(8) Measures to prevent adverse impact on bus operations and the safety and function of the cycleway during 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:

In order to ensure that increases in traffic, noise and dust associated with the demolition and construction phases of the development are minimised and 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, and Southwark Plan 2022 policies: P50 Highways impacts; P56 Protection of amenity; P62 Reducing waste; P64 Contaminated land and hazardous substances; P65 Improving air quality; P66 Reducing noise pollution and enhancing soundscapes.

Permission is subject to the following Grade Condition(s)

6. 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, available rooting space, tree pits, surfacing materials of any parking, access, or pathways layouts, materials and edge details), shall be submitted to and approved in writing by the Local Planning Authority. The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use.

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

Reason:

So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2021; 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; P55 (Protection of Amenity), P13 (Design Quality) P14 (Design of Places and P56 (Biodiversity) of the Southwark Plan 2022.

7. Before any above grade work hereby authorised begins, details of the

biodiversity (green/brown) roof(s) shall be submitted to and approved in writing by the Local Planning Authority. The biodiversity (green/brown) roof(s) shall be:

biodiversity based with extensive substrate base (depth 80-150mm);

laid out in accordance with agreed plans; and

planted/seeded with an agreed mix of species within the first planting season following the practical completion of the building works focused on wildflower planting, and no more than a maximum of 25% sedum coverage).

The biodiversity (green/brown) roof shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency.

The biodiversity roof(s) shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.

Discharge of this condition will be granted on receiving the details of the green/brown roof(s) and Southwark Council agreeing the submitted plans, and once the green/brown roof(s) are completed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the roof has been constructed to the agreed specification.

Reason:

So that the Council may be satisfied with the details of the landscaping scheme, in accordance with Chapters 8 (Promoting healthy and safe communities), 12 (Achieving well designed places), and 15 (Conserving and enhancing the natural environment) of the National Planning Policy Framework (2021); and Saved P55 (Protection of Amenity), P14 (Design Quality) P13 (Design of Places) and P56 (Biodiversity) of the Southwark Plan (2022).

8. Section detail-drawings at a scale of 1:5 through: the facades and balconies; parapets and roof edges; and heads, cills and jambs of all openings; Details of the entrance doors; picture window; window openings; rooftop plant; to be used in the carrying out of this permission shall be submitted to and approved by the Local Planning Authority in writing before any above grade works hereby authorised begins; 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 D4 (Delivering good design) of the London Plan 2021, P13 (Design of places) P14 (Design Quality) of the Southwark Plan 2022.

9. Before the first occupation of the building hereby approved, details of the installation (including location and type) of electric vehicle charger points for each parking space within the disabled car parking area shall be submitted to and approved in writing by the Local Planning Authority and the electric vehicle charger points shall be installed prior to occupation of the development and the development shall not be carried out otherwise in accordance with any such approval given.

Reason

To encourage more sustainable travel in accordance with The National Planning Policy Framework 2021; T6 of the New London Plan 2021; P53 and P54 of the New Southwark Plan 2022.

10. Before any above grade work hereby authorised begins, details (1:50 scale drawings) of the facilities to be provided for the secure and covered storage of cycles shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the cycle parking facilities provided shall be retained and the space used for no other purpose, and the development shall not be carried out otherwise 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 Chapter 9 (Promoting sustainable transport) of the National Planning Policy Framework (2021); Policy T5 (Cycling) of the London Plan (2021); P51 (Walking) P53 (Cycling) P49 (public transport) P53 (car parking) Southwark Plan 2022

11. Before any fit out works to the commercial premises hereby authorised begins, an independently verified BREEAM report (detailing performance in each category, overall score, BREEAM rating and a BREEAM certificate of building performance) to achieve a minimum 'excellent' rating shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any such approval given;

Before the first occupation of the building hereby permitted, a certified Post Construction Review (or other verification process agreed with the local planning authority) shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed standards at (a) have been met.

Reason

To ensure the proposal complies with The National Planning Policy Framework 2021 Saved P69 Sustainability standards and P70 Energy of the Southwark Plan 2022.

12. Prior to above grade works commencing, material samples of all external facing materials to be used 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 otherwise than in accordance with any such approval given.

Reason:

In order to ensure that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing in accordance with Chapter 12 (Achieving well-designed places) of the National Planning Policy Framework (2021); Policy D4 (Delivering good design) of the London Plan (2021); P14 (Design Quality) P13 (Design of Places) Southwark Plan 2022.

13. Details of 10 swift bricks shall be submitted to and approved in writing by the Local Planning Authority prior to any above grade works of the application hereby granted permission.

No less than 10 swift bricks as outlined in Bat Survey (September 2020 by PJC Consultancy ref: 4382E/20) and an Ecological Appraisal (September 2020 by PJC Consultancy ref: 4279E/20) shall be provided and the details shall include the exact location, specification and design of the habitats.

The bricks shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained. The nesting bricks shall be installed strictly in accordance with the details so approved, shall be maintained as such thereafter.

Discharge of this condition will be granted on receiving the details of the nest/roost features and mapped locations and Southwark Council agreeing the submitted plans, and once the nest/roost features are installed in full in

accordance to the agreed plans. A post completion assessment will be required to confirm the nest/roost features have been installed to the agreed specification.

Reason

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with Chapter 15 the National Planning Policy Framework 2021, Policy G6 (Biodiversity and access to nature) of the London Plan 2021 and P60 (Biodiversity) Southwark Plan 2022

14. Confirmation of the following shall be submitted to and approved in writing by the Local Planning Authority prior to any above grade works of the application hereby granted permission, to demonstrate that either:
- all water network upgrades required to accommodate the additional flows to serve the development have been completed; or
 - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.

Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. To prevent the increased risk of flooding and to improve water quality in accordance with The National Planning Policy Framework 2021, P67 (reducing water use) P68 (reducing flood risk) of Southwark Plan 2022

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

16. Before the first occupation of the building hereby permitted, a detailed Delivery and Servicing Management Plan (DSMP) detailing how all elements of the site are to be serviced has been submitted to and approved in writing by the Local Planning Authority.

The development shall be carried out in accordance with the approval given and shall remain for as long as the development is occupied.

Reason

To ensure compliance with The National Planning Policy Framework 2021, P49 (public transport) P50 (Highways impact) Southwark Plan 2022; T7 London Plan 2021.

17. No works, (except for demolition and site clearance) shall commence until full details of any proposed piling or any other foundation designs using penetrative methods have been submitted to and approved in writing by the Local Planning Authority, so it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason

To ensure any piling does not significantly impact on or cause failure of the local underground sewerage utility infrastructure in accordance with the National Planning Policy Framework 2021 and P67 (reducing water use) P68 (reducing flood risk) of Southwark Plan 2022

18. Prior to the commencement of use, full particulars and details of a scheme for the extraction and venting of odours, fats and particulate matter from the cooking activities shall be submitted to and approved by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any approval given.

Reason

In order to ensure that that any installed ventilation, ducting and ancillary equipment in the interests of amenity will not cause amenity impacts such as odour, fume or noise nuisance and will not detract from the appearance of the building in accordance with The National Planning Policy Framework 2021, P55 Protection of Amenity of The Southwark Plan 2022.

19. Details of any external lighting [including design, power and position of luminaries] and security surveillance equipment of external areas surrounding the building shall be submitted to and approved by the Local Planning Authority in writing before any such lighting or security equipment is installed. The development shall not be carried out otherwise in accordance with any such approval given.

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 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, SP55

Protection of Amenity and P16 Designing out crime of the Southwark Plan 2022.

Permission is subject to the following Compliance Condition(s)

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

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 P55 'Protection of amenity' of the Southwark Plan (2022) and the National Planning Policy Framework 2021.

21. The development must be carried out in accordance with the provisions of the Fire Statement (ref LO20077 dated 29 September 2021 by OFR) prepared by a suitably qualified third party assessor prepared, unless otherwise approved in writing by the Local Planning Authority.

Reason: To ensure that the development incorporates the necessary fire safety measures in accordance with the Mayor's London Plan Policy D12.

22. Internal noise levels
The premises hereby permitted shall be designed to ensure that the following internal noise levels are not exceeded due to environmental noise:

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

Living rooms- 35dB LAeq T †

Dining room - 40 dB LAeq T †

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

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

Reason

To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with P55 (Protection of amenity) P15 (residential design) of the Southwark Plan (2022), and the National Planning Policy Framework 2021.

23. Before the first occupation of the building hereby permitted, the refuse storage arrangements shall be provided as detailed on the drawings hereby approved and shall be made available for use by the occupiers of the dwellings/premises.

The facilities provided 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; P55 (Protection of Amenity) P62 (Waste Reduction) of The Southwark Plan 2022

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

Reason

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the National Planning Policy Framework 2021 and P55 (protection of amenity) Southwark Plan 2022

Informatives

- 1 The Highway Authority requires works to all existing and any proposed new streets and spaces (given for adoption or not) to be designed and constructed to adoptable standards.

Southwark Council's published adoptable standards as Highway Authority are contained in the Southwark Streetscape Design Manual (SSDM),

<https://www.southwark.gov.uk/transport-and-roads/asset-management-and-streetscape-design/southwark-streetscape-design-manual-ssdm>

Applicants will be required to enter into a s278 agreement under the Highways Act 1980 for any works to existing adopted Highwayst to complete the following works:

Repave the footway including new kerbing fronting the development on Rodney Road, Stead Street & Orb Street in accordance with the Southwark Streetscape Design Manual (SSDM) standards.

Reconstruct any redundant vehicle crossovers fronting the development as footway in accordance with the SSDM standards.

Reconstruct any existing tree pits fronting the development in accordance with the SSDM standards.

Improve pedestrian crossings in Rodney Road and Orb Street and adjust Nursery Row Park grass to meet pavement level.

Upgrade street lighting to current LBS standards (including on private roads). Investigate the possibility to provide lamp columns mounted to the building walls in order to improve effective footway widths. Please contact Perry Hazell at Perry.Hazell@southwark.gov.uk for further details.

The applicant should liaise with the Waste Management Team (Michael.Greenhalf@southwark.gov.uk) with regards to the waste management strategy.

Review existing and proposed signage fronting the development and investigate the possibility to install any existing / proposed signs on the building walls in order to improve effective footway widths.

Provide appropriate dropped kerbs for refuse bin collection.

Promote a TRO to amend any parking arrangements. Works to include road marking and signage (if required).

Refresh road markings following kerb installation.

Rectify any damaged footways, kerbs, inspection covers and street furniture due to the construction of the development.

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

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

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

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

- 4 A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths, private swimming pools and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, commercial swimming pools, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc may be required before the Company can give its consent. Applications should be made at <https://wholesale.thameswater.co.uk/Wholesale-services/Business-customers/Trade-effluent> or alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.
- 5 Detailed designs and method statements (AIP) for foundations and basement structures retaining the highway (temporary and permanent) should be submitted and approved by the Highway Authority. Please contact Anthony Davis at Anthony.Davis@southwark.gov.uk.

- 6 As the site is at residual risk from the River Thames, a stand alone Flood Warning and Emergency Evacuation Plan should be submitted to Southwark's Emergency Planning department for their approval prior to occupation of the site. The plan should state how occupants will be made aware that they can sign up to the Environment Agency Flood Warning services, and of the plan itself. It should also provide details of how residents should respond in the event that they receive a flood warning, or become aware of a flood.

Reason: To minimise the risk of flooding in accordance with the Southwark Strategic Flood Risk Assessment (2017)

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

Appendix 2: Relevant Planning Policy

National Planning Policy Framework (NPPF)

The revised National Planning Policy Framework ('NPPF'), published on 20 July 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.

Paragraph 2 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.

The relevant chapters of the NPPF are:

- Chapter 2 - Achieving sustainable development
- Chapter 5 Delivering a sufficient supply of homes
- 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

The London Plan (2021)

On 2 March 2021, the Mayor of London published the London Plan 2021. The spatial development strategy sets a strategic framework for planning in Greater London and forms part of the statutory Development Plan for Greater London.

The relevant policies are:

- Policy SD1 Opportunity Areas
- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, other strategic functions and residential development in the CAZ
- Policy SD6 Town centres and high streets
- SD10 Strategic and local regeneration
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering good design

- Policy D5 Inclusive design
- Policy D8 Public realm
- Policy D9 Tall buildings
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire safety
- Policy D14 Noise
- Policy S1 Developing London's social infrastructure
- Policy E10 Visitor infrastructure
- Policy E11 Skills and opportunities for all
- Policy HC1 Heritage conservation and growth
- 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 T3 Transport capacity, connectivity and safeguarding
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car parking
- Policy T6.4 Hotel and leisure uses parking
- Policy T6.5 Non-residential disabled persons parking
- Policy T7 Deliveries, servicing and construction

Southwark Plan 2022

The Southwark Plan 2022 was adopted on 23 February 2022. The plan provides strategic policies, development management policies, area visions and site allocations which set out the strategy for managing growth and development across the borough from 2019 to 2036. The relevant policies are:

- P13 Design of places
- P14 Design quality
- P16 Designing out crime
- P17 Tall buildings
- P18 Efficient use of land
- P21 Conservation of the historic environment and natural heritage
- P22 Borough views
- P23 Archaeology
- P28 Access to employment and training
- P32 Small shops
- P33 Business relocation
- P35 Town and local centres
- P41 Hotels and other visitor accommodation
- P44 Broadband and digital infrastructure
- P45 Healthy developments
- P46 Leisure, arts and culture
- P47 Community uses

- P49 Public transport
- P50 Highways impacts
- P51 Walking
- P53 Cycling
- P54 Car Parking
- P55 Parking standards for disabled people and the physically impaired
- P56 Protection of amenity
- P57 Open space
- P59 Green infrastructure
- P60 Biodiversity
- P61 Trees
- P62 Reducing waste
- P64 Contaminated land and hazardous substances
- P65 Improving air quality
- P66 Reducing noise pollution and enhancing soundscapes
- P67 Reducing water use
- P68 Reducing food risk
- P69 Sustainability standards
- P70 Energy

Appendix 3: Consultation undertaken

Site notice date: n/a.

Press notice date: 12/11/2020

Case officer site visit date: n/a

Neighbour consultation letters sent: 09/06/2021

Internal services consulted

Archaeology

Community Infrastructure Levy Team

Design and Conservation Team [Formal]

Local Economy

Ecology

Environmental Protection

Highways Development and Management

Highways Licensing

Flood Risk Management & Urban Drainage

Transport Policy

Urban Forester

Waste Management

Design and Conservation Team [Formal]

Waste Management

Archaeology

Local Economy

Ecology

Highways Development and Management

Highways Licensing

Flood Risk Management & Urban Drainage

Urban Forester

Waste Management

Environmental Protection

Local Economy

Flood Risk Management & Urban Drainage

Waste Management

Community Infrastructure Levy Team

Urban Forester

Flood Risk Management & Urban Drainage

Ecology

Statutory and non-statutory organisations

Tree Services

EDF Energy

Environment Agency

London Fire & Emergency Planning Authority

Metropolitan Police Service (Designing O

Transport for London

Thames Water
 EDF Energy
 Environment Agency
 London Fire & Emergency Planning Authori
 Metropolitan Police Service (Designing O
 Transport for London
 Thames Water
 Tree Services
 London Fire & Emergency Planning Authori

Neighbour and local groups consulted:

Flat 10 Edward Clifford House Elsted Street	Flat 2 Dawes House Rodney Estate Orb Street
Flat 7 10 Catesby Street London	Flat 13 Dawes House Rodney Estate Orb Street
Flat 10 Lock Fields House Wadding Street	Flat 91 Dawes House Rodney Estate Orb Street
Flat 20 Lock Fields House Wadding Street	Flat 4 Blendon House Wadding Street
Flat 14 Lock Fields House Wadding Street	English Martyrs R C And St Veronicas Girls School Flint Street London
Flat 4 Lock Fields House Wadding Street	Meeting Room Hillery Close London
Flat 3 Blendon House Wadding Street	Rose And Crown 94-96 Rodney Road London
603 Mansfield Point Rodney Road London	Block K Flat 13 Peabody Estate Rodney Road
8 Chatham Street London Southwark	Flat B 25 Deans Buildings London
Flat 107 Dawes House Rodney Estate Orb Street	Block H Flat 9 Peabody Estate Rodney Road
Flat 39 Jesson House Rodney Estate Orb Street	Block B Flat 1 Peabody Estate Rodney Road
Flat 3 Jesson House Rodney Estate Orb Street	Block K Flat 8 Peabody Estate Rodney Road
Flat 25 Jesson House Rodney Estate Orb Street	1 Locksfield Catesby Street London
Flat 23 Jesson House Rodney Estate Orb Street	Block H Flat 1 Peabody Estate Rodney Road
Flat 21 Jesson House Rodney Estate Orb Street	201 Rodney Road London Southwark
Flat 14 Jesson House Rodney Estate Orb Street	Flat 1 10 Catesby Street London
29 Locksfield Catesby Street London	Flat 11 Jesson House Rodney Estate Orb Street
22 Locksfield Catesby Street London	Flat 31 Dawes House Rodney Estate Orb Street
21 Locksfield Catesby Street London	102 Rodney Road London Southwark
19 Locksfield Catesby Street London	22 Hillery Close London Southwark
8 Salisbury Close London Southwark	Flat 70 Dawes House Rodney Estate Orb Street
24 Hillery Close London Southwark	Flat 38 Jesson House Rodney Estate Orb Street
23 Hillery Close London Southwark	
191 Rodney Road London Southwark	

30 Chatham Street London Southwark	155 Rodney Road London Southwark
Flat 85 Dawes House Rodney Estate	Flat 11 Lock Fields House Wadding
Orb Street	Street
34 Nursery Row London Southwark	Flat 89 Dawes House Rodney Estate
20 Hillery Close London Southwark	Orb Street
Flat 82 Dawes House Rodney Estate	Flat 84 Dawes House Rodney Estate
Orb Street	Orb Street
Flat 61 Dawes House Rodney Estate	Flat 59 Dawes House Rodney Estate
Orb Street	Orb Street
Flat 5 Edward Clifford House Elsted	167 Rodney Road London Southwark
Street	157 Rodney Road London Southwark
Block K Flat 12 Peabody Estate Rodney	153 Rodney Road London Southwark
Road	93 Rodney Road London Southwark
Flat 35 Jesson House Rodney Estate	81 Rodney Road London Southwark
Orb Street	135 Rodney Road London Southwark
Flat 88 Dawes House Rodney Estate	Flat 49 Dawes House Rodney Estate
Orb Street	Orb Street
704 Mansfield Point Rodney Road	Flat 8 Atkinson House Barlow Estate
London	Barlow Street
30 Salisbury Close London Southwark	Flat 6 Atkinson House Barlow Estate
103 Rodney Road London Southwark	Barlow Street
1 Stockham Court Rodney Road London	Flat 21 Atkinson House Barlow Estate
Block J Flat 9 Peabody Estate Rodney	Barlow Street
Road	Flat 18 Atkinson House Barlow Estate
Flat 118 Dawes House Rodney Estate	Barlow Street
Orb Street	13 Kennedy Walk London Southwark
11 Kennedy Walk London Southwark	13 Hemp Walk London Southwark
19 Hillery Close London Southwark	Block K Flat 4 Peabody Estate Rodney
Flat 110 Dawes House Rodney Estate	Road
Orb Street	Block B Flat 15 Peabody Estate Rodney
Flat 15 Jesson House Rodney Estate	Road
Orb Street	8 Locksfield Catesby Street London
15 Hemp Walk London Southwark	Block B Flat 10 Peabody Estate Rodney
Flat 48 Dawes House Rodney Estate	Road
Orb Street	Church Of The English Martyrs 142
Flat 19 Dawes House Rodney Estate	Rodney Road London
Orb Street	501 Mansfield Point Rodney Road
Flat 17 Dawes House Rodney Estate	London
Orb Street	302 Mansfield Point Rodney Road
Flat 58 Dawes House Rodney Estate	London
Orb Street	202 Mansfield Point Rodney Road
Flat 50 Dawes House Rodney Estate	London
Orb Street	103 Mansfield Point Rodney Road
Flat 22 Atkinson House Barlow Estate	London
Barlow Street	101 Mansfield Point Rodney Road
Flat 12 Edward Clifford House Elsted	London
Street	Flat 28 Blendon House Wadding Street
13 Hillery Close London Southwark	Flat 5 10 Catesby Street London

Flat 1 Lock Fields House Wadding Street
 Flat 6 Blendon House Wadding Street
 206 Stockham Court Rodney Road
 London
 203 Stockham Court Rodney Road
 London
 505 Mansfield Point Rodney Road
 London
 503 Mansfield Point Rodney Road
 London
 Flat A 27 Deans Buildings London
 Flat 101 Dawes House Rodney Estate
 Orb Street
 Flat 7 Jesson House Rodney Estate Orb
 Street
 Flat 28 Jesson House Rodney Estate
 Orb Street
 Flat 12 Jesson House Rodney Estate
 Orb Street
 32 Locksfield Catesby Street London
 3 Locksfield Catesby Street London
 24 Locksfield Catesby Street London
 21 Salisbury Close London Southwark
 Flat 42 Dawes House Rodney Estate
 Orb Street
 Flat 38 Dawes House Rodney Estate
 Orb Street
 32 Hillery Close London Southwark
 10 Hillery Close London Southwark
 199 Rodney Road London Southwark
 Flat 15 Dawes House Rodney Estate
 Orb Street
 Flat 77 Dawes House Rodney Estate
 Orb Street
 Flat 56 Dawes House Rodney Estate
 Orb Street
 145 Rodney Road London Southwark
 123 Rodney Road London Southwark
 117 Rodney Road London Southwark
 101 Rodney Road London Southwark
 Flat 4 Atkinson House Barlow Estate
 Barlow Street
 Flat 13 Atkinson House Barlow Estate
 Barlow Street
 12 Kennedy Walk London Southwark
 Block A Flat 6 Peabody Estate Rodney
 Road
 7 Locksfield Catesby Street London
 Block J Flat 1 Peabody Estate Rodney
 Road
 Flat C 23 Deans Buildings London
 4 Stockham Court Rodney Road London
 605 Mansfield Point Rodney Road
 London
 502 Mansfield Point Rodney Road
 London
 105 Mansfield Point Rodney Road
 London
 Flat 21 Lock Fields House Wadding
 Street
 Flat 19 Lock Fields House Wadding
 Street
 Flat 16 Lock Fields House Wadding
 Street
 Flat 16 Blendon House Wadding Street
 Flat 13 Blendon House Wadding Street
 15 Salisbury Close London Southwark
 16 Chatham Street London Southwark
 35 Orb Street London Southwark
 95 Rodney Road London Southwark
 18 Locksfield Catesby Street London
 Flat C 25 Deans Buildings London
 16 Salisbury Close London Southwark
 Flat 18 Dawes House Rodney Estate
 Orb Street
 Flat 87 Dawes House Rodney Estate
 Orb Street
 Block K Flat 5 Peabody Estate Rodney
 Road
 Block A Flat 8 Peabody Estate Rodney
 Road
 Block H Flat 2 Peabody Estate Rodney
 Road
 7 Salisbury Close London Southwark
 11 Salisbury Close London Southwark
 75 Rodney Road London Southwark
 69 Rodney Road London Southwark
 119 Rodney Road London Southwark
 Flat 99 Dawes House Rodney Estate
 Orb Street
 9 Kennedy Walk London Southwark
 34 Hillery Close London Southwark
 Flat 115 Dawes House Rodney Estate
 Orb Street
 Flat 103 Dawes House Rodney Estate
 Orb Street

Flat 26 Dawes House Rodney Estate Orb Street	Flat 10 Atkinson House Barlow Estate Barlow Street
Flat 78 Dawes House Rodney Estate Orb Street	Flat 4 Edward Clifford House Elsted Street
Flat 65 Dawes House Rodney Estate Orb Street	Block H Flat 11 Peabody Estate Rodney Road
Flat 53 Dawes House Rodney Estate Orb Street	5 Locksfield Catesby Street London
Flat 7 Atkinson House Barlow Estate Barlow Street	Block B Flat 9 Peabody Estate Rodney Road
Flat 29 Atkinson House Barlow Estate Barlow Street	Block A Flat 1 Peabody Estate Rodney Road
Flat 1 Edward Clifford House Elsted Street	305 Stockham Court Rodney Road London
97 Rodney Road London Southwark	801 Mansfield Point Rodney Road London
Flat 17 Lock Fields House Wadding Street	404 Mansfield Point Rodney Road London
Flat 17 Blendon House Wadding Street	104 Mansfield Point Rodney Road London
Flat 9 Blendon House Wadding Street	Flat 23 Lock Fields House Wadding Street
Flat 1 Blendon House Wadding Street 701 Mansfield Point Rodney Road London	Flat 12 Lock Fields House Wadding Street
402 Mansfield Point Rodney Road London	Flat 26 Blendon House Wadding Street 30 Nursery Row London Southwark
203 Mansfield Point Rodney Road London	63 Rodney Road London Southwark
106 Mansfield Point Rodney Road London	10 Kennedy Walk London Southwark
Flat 6 10 Catesby Street London	Block A Flat 9 Peabody Estate Rodney Road
Flat 98 Dawes House Rodney Estate Orb Street	Flat A 21 Deans Buildings London
Flat 102 Dawes House Rodney Estate Orb Street	Block H Flat 4 Peabody Estate Rodney Road
14 Locksfield Catesby Street London	Flat 104 Dawes House Rodney Estate Orb Street
25 Salisbury Close London Southwark	Flat C 19 Deans Buildings London
24 Salisbury Close London Southwark	Block J Flat 14 Peabody Estate Rodney Road
7 Hillery Close London Southwark	Block J Flat 7 Peabody Estate Rodney Road
189 Rodney Road London Southwark	Block B Flat 8 Peabody Estate Rodney Road
Flat 93 Dawes House Rodney Estate Orb Street	20 Salisbury Close London Southwark
Flat 86 Dawes House Rodney Estate Orb Street	131 Rodney Road London Southwark
Flat 69 Dawes House Rodney Estate Orb Street	Flat 120 Dawes House Rodney Estate Orb Street
Flat 52 Dawes House Rodney Estate Orb Street	Flat 100 Dawes House Rodney Estate Orb Street
151 Rodney Road London Southwark	29 Hemp Walk London Southwark
127 Rodney Road London Southwark	

Flat 22 Jesson House Rodney Estate
 Orb Street
 Flat 28 Dawes House Rodney Estate
 Orb Street
 Flat 63 Dawes House Rodney Estate
 Orb Street
 24 Chatham Street London Southwark
 Flat 14 Atkinson House Barlow Estate
 Barlow Street
 193 Rodney Road London Southwark
 Flat 6 Lock Fields House Wadding Street
 Flat 27 Blendon House Wadding Street
 26 Chatham Street London Southwark
 Flat 109 Dawes House Rodney Estate
 Orb Street
 Flat 40 Jesson House Rodney Estate
 Orb Street
 Flat 34 Jesson House Rodney Estate
 Orb Street
 Flat 32 Jesson House Rodney Estate
 Orb Street
 Flat 16 Jesson House Rodney Estate
 Orb Street
 13 Locksfield Catesby Street London
 Flat 46 Dawes House Rodney Estate
 Orb Street
 Flat 33 Dawes House Rodney Estate
 Orb Street
 Flat 30 Dawes House Rodney Estate
 Orb Street
 35 Hillery Close London Southwark
 27 Hillery Close London Southwark
 17 Hillery Close London Southwark
 203 Rodney Road London Southwark
 Flat 22 Dawes House Rodney Estate
 Orb Street
 Flat 11 Dawes House Rodney Estate
 Orb Street
 Flat 94 Dawes House Rodney Estate
 Orb Street
 Flat 74 Dawes House Rodney Estate
 Orb Street
 Flat 71 Dawes House Rodney Estate
 Orb Street
 Flat 54 Dawes House Rodney Estate
 Orb Street
 165 Rodney Road London Southwark
 159 Rodney Road London Southwark
 87 Rodney Road London Southwark
 67 Rodney Road London Southwark
 141 Rodney Road London Southwark
 129 Rodney Road London Southwark
 121 Rodney Road London Southwark
 8 Elsted Street London Southwark
 Flat 26 Atkinson House Barlow Estate
 Barlow Street
 Flat 2 Atkinson House Barlow Estate
 Barlow Street
 14 Hemp Walk London Southwark
 Flat 9 Edward Clifford House Elsted
 Street
 Flat 7 Edward Clifford House Elsted
 Street
 Block K Flat 7 Peabody Estate Rodney
 Road
 Block J Flat 15 Peabody Estate Rodney
 Road
 Block J Flat 13 Peabody Estate Rodney
 Road
 Block J Flat 11 Peabody Estate Rodney
 Road
 Block H Flat 15 Peabody Estate Rodney
 Road
 Block H Flat 6 Peabody Estate Rodney
 Road
 Block H Flat 5 Peabody Estate Rodney
 Road
 Block H Flat 3 Peabody Estate Rodney
 Road
 4 Locksfield Catesby Street London
 33 Locksfield Catesby Street London
 Block B Flat 2 Peabody Estate Rodney
 Road
 703 Mansfield Point Rodney Road
 London
 304 Mansfield Point Rodney Road
 London
 Flat 18 Lock Fields House Wadding
 Street
 Flat 5 Lock Fields House Wadding Street
 Flat 24 Blendon House Wadding Street
 Flat 18 Blendon House Wadding Street
 1 Silk Apartments Wadding Street
 London
 Flat 4 10 Catesby Street London
 36 Nursery Row London Southwark

802 Mansfield Point Rodney Road
 London
 Flat 3 Atkinson House Barlow Estate
 Barlow Street
 27 Hemp Walk London Southwark
 Block J Flat 5 Peabody Estate Rodney
 Road
 602 Mansfield Point Rodney Road
 London
 Flat 3 Lock Fields House Wadding Street
 Flat 113 Dawes House Rodney Estate
 Orb Street
 206 Mansfield Point Rodney Road
 London
 Flat 36 Jesson House Rodney Estate
 Orb Street
 Flat 17 Jesson House Rodney Estate
 Orb Street
 185 Rodney Road London Southwark
 Flat 24 Atkinson House Barlow Estate
 Barlow Street
 34 Locksfield Catesby Street London
 30 Locksfield Catesby Street London
 20 Locksfield Catesby Street London
 12 Locksfield Catesby Street London
 23 Salisbury Close London Southwark
 17 Salisbury Close London Southwark
 61 Rodney Road London Southwark
 125 Rodney Road London Southwark
 Flat 8 Jesson House Rodney Estate Orb
 Street
 Flat 24 Jesson House Rodney Estate
 Orb Street
 Flat 13 Jesson House Rodney Estate
 Orb Street
 Flat 36 Dawes House Rodney Estate
 Orb Street
 Flat 1 Dawes House Rodney Estate Orb
 Street
 6 Chatham Street London Southwark
 Flat 55 Dawes House Rodney Estate
 Orb Street
 Flat 25 Atkinson House Barlow Estate
 Barlow Street
 Flat 12 Atkinson House Barlow Estate
 Barlow Street
 Flat 1 Atkinson House Barlow Estate
 Barlow Street

163 Rodney Road London Southwark
 149 Rodney Road London Southwark
 Flat 11 Blendon House Wadding Street
 303 Stockham Court Rodney Road
 London
 5 Stockham Court Rodney Road London
 3 Stockham Court Rodney Road London
 405 Mansfield Point Rodney Road
 London
 14 Chatham Street London Southwark
 Flat 5 Jesson House Rodney Estate Orb
 Street
 Flat 43 Jesson House Rodney Estate
 Orb Street
 11 Locksfield Catesby Street London
 10 Locksfield Catesby Street London
 9 Salisbury Close London Southwark
 28 Salisbury Close London Southwark
 27 Salisbury Close London Southwark
 22 Salisbury Close London Southwark
 19 Salisbury Close London Southwark
 4 Hillery Close London Southwark
 3 Hillery Close London Southwark
 29 Hillery Close London Southwark
 21 Hillery Close London Southwark
 Flat 24 Dawes House Rodney Estate
 Orb Street
 Flat 20 Dawes House Rodney Estate
 Orb Street
 Flat 72 Dawes House Rodney Estate
 Orb Street
 173 Rodney Road London Southwark
 99 Rodney Road London Southwark
 137 Rodney Road London Southwark
 107 Rodney Road London Southwark
 Flat 9 Atkinson House Barlow Estate
 Barlow Street
 Flat 17 Atkinson House Barlow Estate
 Barlow Street
 Flat 15 Atkinson House Barlow Estate
 Barlow Street
 Block K Flat 11 Peabody Estate Rodney
 Road
 Block K Flat 9 Peabody Estate Rodney
 Road
 Block J Flat 6 Peabody Estate Rodney
 Road
 Block A Flat 14 Peabody Estate Rodney

Road
 Block A Flat 7 Peabody Estate Rodney Road
 Road
 Block H Flat 13 Peabody Estate Rodney Road
 Road
 Block B Flat 14 Peabody Estate Rodney Road
 Road
 Flat B 19 Deans Buildings London
 Flat 21A Dawes House Rodney Estate Orb Street
 705 Mansfield Point Rodney Road London
 702 Mansfield Point Rodney Road London
 403 Mansfield Point Rodney Road London
 301 Mansfield Point Rodney Road London
 Flat 8 Lock Fields House Wadding Street
 Flat 20 Blendon House Wadding Street
 Flat 10 Blendon House Wadding Street
 Flat 5 Blendon House Wadding Street
 Flat 8 Edward Clifford House Elsted Street
 Street
 Flat 3 Edward Clifford House Elsted Street
 Street
 Flat 3 10 Catesby Street London
 Flat 86A Dawes House Rodney Estate Orb Street
 Orb Street
 Second Floor Flat Lady Margaret Church 53 Chatham Street
 22 Chatham Street London Southwark
 201 Stockham Court Rodney Road London
 205 Mansfield Point Rodney Road London
 Lady Margaret Vicarage Balfour Street London
 Block K Flat 15 Peabody Estate Rodney Road
 Road
 Block K Flat 10 Peabody Estate Rodney Road
 Road
 Flat C 21 Deans Buildings London
 5 Silk Apartments Wadding Street London
 2 Silk Apartments Wadding Street London
 26 Nursery Row London Southwark
 Flat B 27 Deans Buildings London
 4 Silk Apartments Wadding Street London
 London
 3 Silk Apartments Wadding Street London
 London
 Flat 24 Lock Fields House Wadding Street
 Street
 Flat 12 Blendon House Wadding Street
 6 Silk Apartments Wadding Street London
 London
 504 Mansfield Point Rodney Road London
 London
 204 Mansfield Point Rodney Road London
 London
 Flat A 19 Deans Buildings London
 Flat A 25 Deans Buildings London
 29 Salisbury Close London Southwark
 26 Salisbury Close London Southwark
 14 Salisbury Close London Southwark
 175 Rodney Road London Southwark
 91 Rodney Road London Southwark
 169 Rodney Road London Southwark
 1 Hillery Close London Southwark
 187 Rodney Road London Southwark
 Flat 48A Dawes House Rodney Estate Orb Street
 Orb Street
 Flat 10A Dawes House Rodney Estate Orb Street
 Orb Street
 Flat 2 10 Catesby Street London
 Flat 7 Lock Fields House Wadding Street
 Flat 2 Lock Fields House Wadding Street
 Flat 15 Lock Fields House Wadding Street
 Street
 Flat 13 Lock Fields House Wadding Street
 Street
 32 Nursery Row London Southwark
 28 Nursery Row London Southwark
 9 Locksfield Catesby Street London
 Flat 21 Blendon House Wadding Street
 Flat 19 Blendon House Wadding Street
 32 Salisbury Close London Southwark
 16 Locksfield Catesby Street London
 Flat 16 Dawes House Rodney Estate Orb Street
 Orb Street
 115 Rodney Road London Southwark
 Flat 5 Dawes House Rodney Estate Orb Street
 Street
 197 Rodney Road London Southwark

Flat 29 Dawes House Rodney Estate
 Orb Street
 36 Hillery Close London Southwark
 171 Rodney Road London Southwark
 Flat 41 Jesson House Rodney Estate
 Orb Street
 Flat 20 Jesson House Rodney Estate
 Orb Street
 Block B Flat 7 Peabody Estate Rodney
 Road
 Flat 112 Dawes House Rodney Estate
 Orb Street
 18 Chatham Street London Southwark
 105 Rodney Road London Southwark
 25 Hillery Close London Southwark
 Flat 39 Dawes House Rodney Estate
 Orb Street
 Flat 73 Dawes House Rodney Estate
 Orb Street
 Flat 27 Atkinson House Barlow Estate
 Barlow Street
 Flat 16 Atkinson House Barlow Estate
 Barlow Street
 Flat 22 Blendon House Wadding Street
 Flat 9 10 Catesby Street London
 Block B Flat 12 Peabody Estate Rodney
 Road
 Block H Flat 10 Peabody Estate Rodney
 Road
 Block K Flat 6 Peabody Estate Rodney
 Road
 16 Orb Street London Southwark
 Flat 6 Edward Clifford House Elsted
 Street
 6 Hillery Close London Southwark
 12 Hillery Close London Southwark
 Flat 67 Dawes House Rodney Estate
 Orb Street
 77 Rodney Road London Southwark
 Block K Flat 3 Peabody Estate Rodney
 Road
 Block J Flat 12 Peabody Estate Rodney
 Road
 Block H Flat 14 Peabody Estate Rodney
 Road
 Block H Flat 7 Peabody Estate Rodney
 Road
 5 Hillery Close London Southwark
 Flat 42 Jesson House Rodney Estate
 Orb Street
 Flat 2 Jesson House Rodney Estate Orb
 Street
 Flat 18 Jesson House Rodney Estate
 Orb Street
 Flat 3 Dawes House Rodney Estate Orb
 Street
 Flat 21 Dawes House Rodney Estate
 Orb Street
 Flat 12 Dawes House Rodney Estate
 Orb Street
 12 Chatham Street London Southwark
 Flat 19 Atkinson House Barlow Estate
 Barlow Street
 102 Mansfield Point Rodney Road
 London
 20 Chatham Street London Southwark
 2 Chatham Street London Southwark
 Flat 114 Dawes House Rodney Estate
 Orb Street
 Flat 111 Dawes House Rodney Estate
 Orb Street
 Flat 45 Jesson House Rodney Estate
 Orb Street
 Flat 37 Jesson House Rodney Estate
 Orb Street
 Flat 31 Jesson House Rodney Estate
 Orb Street
 Flat 1 Jesson House Rodney Estate Orb
 Street
 27 Locksfield Catesby Street London
 Flat 41 Dawes House Rodney Estate
 Orb Street
 Flat 35 Dawes House Rodney Estate
 Orb Street
 30 Hillery Close London Southwark
 14 Hillery Close London Southwark
 183 Rodney Road London Southwark
 Flat 96 Dawes House Rodney Estate
 Orb Street
 Flat 64 Dawes House Rodney Estate
 Orb Street
 85 Rodney Road London Southwark
 109 Rodney Road London Southwark
 6 Elsted Street London Southwark
 Flat 11 Atkinson House Barlow Estate
 Barlow Street

16 Hemp Walk London Southwark
 Block J Flat 8 Peabody Estate Rodney
 Road
 Block A Flat 12 Peabody Estate Rodney
 Road
 Block K Flat 1 Peabody Estate Rodney
 Road
 301 Stockham Court Rodney Road
 London
 204 Stockham Court Rodney Road
 London
 601 Mansfield Point Rodney Road
 London
 306 Mansfield Point Rodney Road
 London
 Flat 2 Blendon House Wadding Street
 2 Locksfield Catesby Street London
 26 Hillery Close London Southwark
 177 Rodney Road London Southwark
 147 Rodney Road London Southwark
 Block J Flat 2 Peabody Estate Rodney
 Road
 6 Locksfield Catesby Street London
 26 Locksfield Catesby Street London
 Block A Flat 15 Peabody Estate Rodney
 Road
 Block A Flat 5 Peabody Estate Rodney
 Road
 Block A Flat 3 Peabody Estate Rodney
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 Block B Flat 11 Peabody Estate Rodney
 Road
 Block B Flat 6 Peabody Estate Rodney
 Road
 139 Rodney Road London Southwark
 4 Elsted Street London Southwark
 31 Hillery Close London Southwark
 28 Hillery Close London Southwark
 Flat 6 Jesson House Rodney Estate Orb
 Street
 Flat 4 Jesson House Rodney Estate Orb
 Street
 Flat 27 Jesson House Rodney Estate
 Orb Street
 Flat 6 Dawes House Rodney Estate Orb
 Street
 Flat 43 Dawes House Rodney Estate
 Orb Street
 Flat 80 Dawes House Rodney Estate
 Orb Street
 Flat 60 Dawes House Rodney Estate
 Orb Street
 Flat 25 Lock Fields House Wadding
 Street
 Flat 22 Lock Fields House Wadding
 Street
 Flat 9 Lock Fields House Wadding Street
 Flat 25 Blendon House Wadding Street
 Flat 14 Blendon House Wadding Street
 804 Mansfield Point Rodney Road
 London
 305 Mansfield Point Rodney Road
 London
 32 Chatham Street London Southwark
 Flat 119 Dawes House Rodney Estate
 Orb Street
 Flat 117 Dawes House Rodney Estate
 Orb Street
 Flat 116 Dawes House Rodney Estate
 Orb Street
 Flat 106 Dawes House Rodney Estate
 Orb Street
 14 Orb Street London Southwark
 Flat 19 Jesson House Rodney Estate
 Orb Street
 Flat 10 Jesson House Rodney Estate
 Orb Street
 31 Locksfield Catesby Street London
 18 Salisbury Close London Southwark
 13 Salisbury Close London Southwark
 10 Salisbury Close London Southwark
 Flat 8 Dawes House Rodney Estate Orb
 Street
 Flat 7 Dawes House Rodney Estate Orb
 Street
 Flat 47 Dawes House Rodney Estate
 Orb Street
 Flat 44 Dawes House Rodney Estate
 Orb Street
 9 Hillery Close London Southwark
 33 Hillery Close London Southwark
 15 Hillery Close London Southwark
 Flat 10 Dawes House Rodney Estate
 Orb Street
 Flat 81 Dawes House Rodney Estate
 Orb Street

Flat 79 Dawes House Rodney Estate
 Orb Street
 Flat 76 Dawes House Rodney Estate
 Orb Street
 Flat 66 Dawes House Rodney Estate
 Orb Street
 Flat 62 Dawes House Rodney Estate
 Orb Street
 Flat 57 Dawes House Rodney Estate
 Orb Street
 79 Rodney Road London Southwark
 73 Rodney Road London Southwark
 65 Rodney Road London Southwark
 143 Rodney Road London Southwark
 104 Rodney Road London Southwark
 Flat 51 Dawes House Rodney Estate
 Orb Street
 Flat 28 Atkinson House Barlow Estate
 Barlow Street
 Flat 23 Atkinson House Barlow Estate
 Barlow Street
 28 Hemp Walk London Southwark
 26 Hemp Walk London Southwark
 Flat 2 Edward Clifford House Elsted
 Street
 Flat 11 Edward Clifford House Elsted
 Street
 Block J Flat 10 Peabody Estate Rodney
 Road
 Block A Flat 4 Peabody Estate Rodney
 Road
 Block A Flat 2 Peabody Estate Rodney
 Road
 Block H Flat 8 Peabody Estate Rodney
 Road
 803 Mansfield Point Rodney Road
 London
 604 Mansfield Point Rodney Road
 London
 Flat 15 Blendon House Wadding Street
 Flat 7 Blendon House Wadding Street
 Flat 8 10 Catesby Street London
 133 Rodney Road London Southwark
 Block J Flat 4 Peabody Estate Rodney
 Road
 Block A Flat 10 Peabody Estate Rodney
 Road
 Block H Flat 12 Peabody Estate Rodney
 Road
 Block B Flat 13 Peabody Estate Rodney
 Road
 83 Rodney Road London Southwark
 111 Rodney Road London Southwark
 Flat 108 Dawes House Rodney Estate
 Orb Street
 Flat 105 Dawes House Rodney Estate
 Orb Street
 Flat 29 Jesson House Rodney Estate
 Orb Street
 Flat 45 Dawes House Rodney Estate
 Orb Street
 Flat 34 Dawes House Rodney Estate
 Orb Street
 Flat 83 Dawes House Rodney Estate
 Orb Street
 Flat 75 Dawes House Rodney Estate
 Orb Street
 49 Chatham Street London Southwark
 Flat 108A Dawes House Rodney Estate
 Orb Street
 306 Stockham Court Rodney Road
 London
 303 Mansfield Point Rodney Road
 London
 51 Chatham Street London Southwark
 4 Chatham Street London Southwark
 28 Chatham Street London Southwark
 10 Chatham Street London Southwark
 Flat 97 Dawes House Rodney Estate
 Orb Street
 Flat 9 Jesson House Rodney Estate Orb
 Street
 12 Orb Street London Southwark
 Flat 26 Jesson House Rodney Estate
 Orb Street
 25 Locksfield Catesby Street London
 17 Locksfield Catesby Street London
 31 Salisbury Close London Southwark
 12 Salisbury Close London Southwark
 Flat 4 Dawes House Rodney Estate Orb
 Street
 Flat 32 Dawes House Rodney Estate
 Orb Street
 2 Hillery Close London Southwark
 18 Hillery Close London Southwark
 11 Hillery Close London Southwark

195 Rodney Road London Southwark
 Flat 27 Dawes House Rodney Estate
 Orb Street
 Flat 25 Dawes House Rodney Estate
 Orb Street
 181 Rodney Road London Southwark
 179 Rodney Road London Southwark
 161 Rodney Road London Southwark
 89 Rodney Road London Southwark
 71 Rodney Road London Southwark
 113 Rodney Road London Southwark
 Block K Flat 14 Peabody Estate Rodney
 Road
 Block K Flat 2 Peabody Estate Rodney
 Road
 Block J Flat 3 Peabody Estate Rodney
 Road
 Block A Flat 11 Peabody Estate Rodney
 Road
 Block B Flat 5 Peabody Estate Rodney
 Road
 Block B Flat 4 Peabody Estate Rodney
 Road
 Flat A 23 Deans Buildings London
 Flat B 23 Deans Buildings London
 Flat B 21 Deans Buildings London
 100 Rodney Road London Southwark
 304 Stockham Court Rodney Road
 London
 302 Stockham Court Rodney Road
 London
 205 Stockham Court Rodney Road
 London
 202 Stockham Court Rodney Road
 London
 2 Stockham Court Rodney Road London
 401 Mansfield Point Rodney Road
 London
 201 Mansfield Point Rodney Road
 London
 Flat 23 Blendon House Wadding Street

Flat 8 Blendon House Wadding Street
 Flat 37 Dawes House Rodney Estate
 Orb Street
 Flat C 27 Deans Buildings London
 28 Locksfield Catesby Street London
 23 Locksfield Catesby Street London
 15 Locksfield Catesby Street London
 Block A Flat 13 Peabody Estate Rodney
 Road
 Block B Flat 3 Peabody Estate Rodney
 Road
 37 Orb Street London Southwark
 8 Hillery Close London Southwark
 16 Hillery Close London Southwark
 Flat 44 Jesson House Rodney Estate
 Orb Street
 Flat 33 Jesson House Rodney Estate
 Orb Street
 Flat 30 Jesson House Rodney Estate
 Orb Street
 Flat 9 Dawes House Rodney Estate Orb
 Street
 Flat 40 Dawes House Rodney Estate
 Orb Street
 Flat 23 Dawes House Rodney Estate
 Orb Street
 Flat 14 Dawes House Rodney Estate
 Orb Street
 Flat 95 Dawes House Rodney Estate
 Orb Street
 Flat 92 Dawes House Rodney Estate
 Orb Street
 Flat 90 Dawes House Rodney Estate
 Orb Street
 Flat 68 Dawes House Rodney Estate
 Orb Street
 Flat 5 Atkinson House Barlow Estate
 Barlow Street
 Flat 20 Atkinson House Barlow Estate
 Barlow Street

Re-consultation:

Appendix 4: Consultation responses received

Internal services

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

Statutory and non-statutory organisations

Environment Agency
 Metropolitan Police Service (Designing O
 Environment Agency
 London Fire & Emergency Planning Authori
 Metropolitan Police Service (Designing O
 Transport for London
 Thames Water

Neighbour and local groups consulted:

96 Rodney Road London SE17 1BG	London
41 longland court avondale sq rolls road	17 Hoptons Gardens Hopton Street
london	London
302 Mansfield Pt Rodeny rd London	37 latimer walworth london
Flat 3 Coleridge House London	24 dunnico house alvey est, east street
Flat 26 Winch House Stead Street	london
LONDON	5 Staunton House Tatum Street London
Flat 26, Winch House Stead Street	Winch House, Stead Street London

SE171BP
 89 dowses house orb street london
 se171rd
 Flat 28 Jardin House Stead Street
 London
 Flat 28 Jardin House Stead Street
 London
 Flat 19 Winch House Stead Street
 London
 Flat 14 winch House Stead Street
 London
 18 ATKINSON HOUSE BARLOW
 STREET LONDON
 71 Harold estate, pages walk london se1
 4hw
 Flat 2 10 Catesby Street LONDON
 102 Brandon Street London Southwark
 28 Sutherland Square London SE17
 3EQ
 Flat 18 Winch House Stead Street
 London
 3, blendon house wadding street london
 6 hemp walk , salisbury estate Walworth
 London
 24 winch House London Se17 1bp
 Flat 16, Winch House, Stead Street 01
 London
 Flat 3 Winch House Stead Street London
 25 Dawes House Orb Street London
 87 wicksteed house county street
 London
 5 cowper house browning street london
 flat 3 coleridge house browning street
 london
 302 Mansfield Point Rodney Road
 London
 44 Belvedere Road London E10 7NPP
 14 colechurch house avondale square
 london
 2 gattonby street london se155gt
 119 Chatham Street Walworth London
 35 Orb st London SE17 1EP
 10 Winch House Stead Street London
 344 east street London Se172sx
 11 Winch House Stead Street London
 81 penrose house penrose st london
 se173dy
 2 winds point drive london se151sd
 10 kingsley flats, old kent road london
 se15xb
 72c hillington street walworth road
 london
 30 Studland London SE17 2TW
 10 kingsley flats, old kent road london
 se15xb
 Flat 23 Winch House Stead Street
 London
 12 NEWBOLT HOUSE BRANDON
 STREET WALWORTH LONDON
 Stead Street Winch House, Flat 9
 London
 Winch House Stead Street London
 SE171BP
 169 rodney road salisbury est london
 Flat 60 Dawes House Orb Street London
 Flat 26 Winch House Stead Street
 London
 29 jesson house, orb street london se17
 1er
 108 Brandon street LONDON
 108 Brandon Street London SE17 1AL
 29, Jesson House Orb Street London
 74 Andoverfords court, Bibury close
 London SE15 6AF
 Flat 1 winch house Stead street London
 31 Dawes House Orb Street Southwark
 4B CHARLESTON STREET London
 SE17 1NF
 804 Mansfield Point Rodney Road
 London
 Flat 26 Jardin House Stead Street
 London
 flat 89 dawes house orb sreet london
 3 blendon house, wadding street london
 se17 1bb
 37 latimer, beaconsfield road walworth
 london
 55 Alma Grove Bermondsey London
 1 long walk London Se13nq
 Arts Network 8-12 Eltham Road
 LONDON
 87, wicksteed house, county st london
 se1 6rh
 41 longland court, avondale sq rolls road
 london
 Chair, Friends of Nursery Row Park c/o

102 Brandon Street London
77 Wendover, Thurlow street Walworth
London
90 kingsley flats, old kent road london
se1 5ur
9, St Stephens House, Elizabeth Est
Phelps Street London
Maple Court, Alvey St London SE172LN

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MUNICIPAL YEAR 2022-23

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PLANNING COMMITTEE

NOTE:

Original held in Constitutional Team; all amendments/queries to Gregory Weaver, Constitutional Team, Tel: 020 7525 3667

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