

Planning Committee (Major Applications) B

Tuesday 7 November 2023

6.30 pm

Ground Floor Meeting Room G01 - 160 Tooley Street, London SE1 2QH

Membership

Councillor Richard Livingstone (Chair)
Councillor Kath Whittam (Vice-Chair)
Councillor Ellie Cumbo
Councillor Sam Foster
Councillor Jon Hartley
Councillor Portia Mwangangye
Councillor Emily Tester

Reserves

Councillor Cassandra Brown
Councillor Sam Dalton
Councillor Barrie Hargrove
Councillor Nick Johnson
Councillor Sarah King
Councillor Reginald Popoola
Councillor Cleo Soanes

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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Access

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

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

Members of the committee are summoned to attend this meeting

Althea Loderick

Chief Executive

Date: 30 October 2023



Planning Committee (Major Applications) B

Tuesday 7 November 2023

6.30 pm

Ground Floor Meeting Room G01 - 160 Tooley Street, London SE1 2QH

Order of Business

Item No.	Title	Page No.
1.	APOLOGIES	
	To receive any apologies for absence.	
2.	CONFIRMATION OF VOTING MEMBERS	
	A representative of each political group will confirm the voting members of the committee.	
3.	NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT	
	In special circumstances, an item of business may be added to an agenda within five clear days of the meeting.	
4.	DISCLOSURE OF INTERESTS AND DISPENSATIONS	
	Members to declare any personal interests and dispensation in respect of any item of business to be considered at this meeting.	
5.	MINUTES	1 - 7
	To approve as a correct record the minutes of the meeting held on 13 September 2023.	
6.	RELEASE OF £393,387.10 FROM S106 AGREEMENTS TOWARDS IMPROVING VICTORY COMMUNITY PARK	8 - 67

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7.	DEVELOPMENT MANAGEMENT	68 - 72
	7.1. THE LIBERTY OF SOUTHWARK (FORMERLY LANDMARK COURT), LAND BOUNDED BY SOUTHWARK STREET, REDCROSS WAY AND CROSSBONES GRAVEYARD, LONDON, SE1	73 - 96
	7.2. 79-161 ILBERTON ROAD, LONDON, SOUTHWARK, SE16 3JZ	97 - 359

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

EXCLUSION OF PRESS AND PUBLIC

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

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

Date: 30 October 2023

Planning Committee (Major Applications)

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 (major applications) is to make planning decisions openly, impartially, with sound judgement and for justifiable reasons in accordance with the statutory planning framework.
4. The following may address the committee (if they are present and wish to speak) for **not more than 3 minutes each**.

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

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

5. If there are a number of people who are objecting to, or are in support of, an application or an enforcement of action, you are requested to identify a representative to address the committee. If more than one person wishes to speak, the 3-minute time allowance must be divided amongst those who wish to speak. Where you are unable to decide who is to speak in advance of the meeting, you are advised to meet with other objectors in the foyer of the council offices prior to the start of the meeting to identify a representative. If this is not possible, the chair will ask which objector(s) would like to speak at the point the actual item is being considered.

6. Speakers should lead the committee to subjects on which they would welcome further questioning.
7. Those people nominated to speak on behalf of objectors, supporters or applicants, as well as ward members, should sit on the front row of the public seating area. This is for ease of communication between the committee and the speaker, in case any issues need to be clarified later in the proceedings; it is **not** an opportunity to take part in the debate of the committee.
8. Each speaker should restrict their comments to the planning aspects of the proposal and should avoid repeating what is already in the report. The meeting is not a hearing where all participants present evidence to be examined by other participants.
9. This is a council committee meeting which is open to the public and there should be no interruptions from the audience.
10. No smoking is allowed at committee.
11. Members of the public are welcome to film, audio record, photograph, or tweet the public proceedings of the meeting; please be considerate towards other people in the room and take care not to disturb the proceedings.

Please note:

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

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

Contacts: General Enquiries
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Governance and Assurance
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Planning Committee (Major Applications) B

MINUTES of the Planning Committee (Major Applications) B held on Wednesday 13 September 2023 at 6.30 pm at Ground Floor Meeting Room G01 - 160 Tooley Street, London SE1 2QH

PRESENT: Councillor Richard Livingstone (Chair)
 Councillor Kath Whittam (Vice-Chair)
 Councillor Ellie Cumbo
 Councillor Barrie Hargrove (Reserve)
 Councillor Portia Mwangangye
 Councillor Emily Tester

OFFICER SUPPORT: Colin Wilson (Head of Strategic Development)
 Nagla Stevens (Deputy Head of Law)
 Dipesh Patel (Manager Strategic Applications)
 Michael Tsoukaris (Group Manager Design & Conservation)
 Gemma Usher (Team Leader, Development Management)
 Rob Davies (Transport Team Leader)
 Gerald Gohler (Constitutional Officer)

1. APOLOGIES

There were apologies for absence from Councillors Sam Foster and Jon Hartley.

2. CONFIRMATION OF VOTING MEMBERS

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

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

The chair drew members' attention to the members' pack and addendum report which had been circulated before the meeting.

4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

The following member declared an interest in item:

5.1 Canada Water Retail Park

Councillor Kath Whittam, non-pecuniary, as these applications are in her ward. She had, however, remained neutral.

5. DEVELOPMENT MANAGEMENT

RESOLVED:

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

5.1 CANADA WATER RETAIL PARK

Planning Application Numbers: 23/AP/0562 • 23/AP/0564 • 23/AP/0565 • 23/AP/0566

Report: see pages 6 to 215 of the main agenda pack and pages 1 to 3 of the addendum report.

PROPOSAL:

Approval of Reserved Matters (access, appearance, landscaping, layout and scale) pursuant to Outline Planning Permission 21/AP/2655 for the comprehensive commercial development of the Canada Water Dockside Masterplan site together with approval of Reserved Matters (access, appearance, landscaping and layout) pursuant to the Outline Planning Permission 21/AP/2610 which proposed hard and soft landscaping to create a shared public realm space for use by pedestrians and vehicles on Maritime Street.

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

Members asked that officers bring back details of the improvements to the Albion pedestrian footbridge to the committee for approval.

There were no objectors wishing to speak.

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

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

The committee then discussed the applications.

Four individual motions to grant each of the applications were moved, seconded, put to the vote and declared carried.

Application 23/AP/0562

RESOLVED:

1. That reserve matter application number 23/AP/0562, pertaining to Building A1 and pursuant to Outline Permission 21/AP/2655 relating to Units 1 and 4 Canada Water Retail Park, be approved subject to the additional conditions and informative as set out in the draft recommendations at the relevant Appendix 1 for this application.
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 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
4. 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
5. That the planning committee in making their decision has due regard to the potential equalities impacts that are outlined in this report.

Application 23/AP/0564**RESOLVED:**

1. That reserve matter application number 23/AP/0564, pertaining to Building A2 and pursuant to Outline Permission 21/AP/2655 relating to Units 1 and 4 Canada Water Retail Park, be approved subject to the additional conditions and informative as set out in the draft recommendations at the relevant Appendix 1 for this application.
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 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
4. 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
5. That the planning committee in making their decision has due regard to the potential equalities impacts that are outlined in this report.

Application 23/AP/0565**RESOLVED:**

1. That reserve matter application number 23/AP/0565, pertaining to the basement spanning Plots A1 and A2 and pursuant to Outline Permission 21/AP/2655 relating to Units 1 and 4 Canada Water Retail Park, be approved subject to the additional conditions and informative as set out in the draft recommendations at the relevant Appendix 1 for this application.
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 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

4. 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
5. That the planning committee in making their decision has due regard to the potential equalities impacts that are outlined in this report.

Application 23/AP/0566

RESOLVED:

1. That reserve matter application number 23/AP/0566, pertaining to hard and soft landscaping and pursuant to Outline Permission 21/AP/2610 relating to Maritime Street, be approved subject to the additional conditions and informative as set out in the draft recommendations at the relevant Appendix 1 for this application.
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 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
4. 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
5. That the planning committee in making their decision has due regard to the potential equalities impacts that are outlined in this report.

The meeting adjourned for a comfort break from 8:30pm to 8:38pm.

5.2 EASTERN EDGE OF CANADA DOCK ADJACENT TO CANADA WATER RETAIL PARK

Planning Application Number: 23/AP/0798

Report: see pages 216 to 320 of the main agenda pack and pages 3 and 4 of the addendum report.

PROPOSAL:

Works to improve and enhance the eastern edge of Canada Dock, including the creation of a public pedestrian promenade at ground level and lower level boardwalk with associated amenity space, soft landscaping, tree planting and associated works together with the relocation and refurbishment of the existing fishing pontoon and the creation of a new fishing pontoon.

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

There were no objectors wishing to speak.

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

A supporter of the scheme addressed the committee and responded to questions put by members of the committee.

There were no ward councillors wishing to speak on this item.

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

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

RESOLVED:

1. That planning permission be granted subject to conditions, as set out in the draft recommendation at Appendix 1 of the report.
2. That the planning committee in making their decision has due regard to the potential equalities impacts that are outlined in this report.

The meeting ended at 9.17 pm.

CHAIR:

DATED:

Item No. 6.	Classification: Open	Date: 7 November 2023	Decision Taker: Planning Committee (Major Applications) B
Report title:		Release of £393,387.10 from S106 agreements towards improving Victory Community Park	
Ward(s) or groups affected:		North Walworth	
From:		Director of Planning and Growth	

RECOMMENDATION

1. That Planning Committee (Major Applications) B approve the release of £393,387.10 of Section 106 funding secured in connection with Elephant Park (set out in more detail below) towards improving the Victory Community Park.

Reference	Account No	Type	Address	Amount
12/AP/1092 Outline application for: Redevelopment to provide a mixed-use development comprising a number of buildings ranging between 13.13m and 104.8m in height with capacity for between 2,300 (min) and 2,469 (max) residential units together with retail (Class A1-A5), business (Class B1), leisure and community (Class D2 and D1), energy centre (sui generis) uses. New landscaping, park and public realm, car parking, means of access and other	W06635	Play, Children's Play Equipment and Sports Development	The Heygate Estate and surrounding land bound by New Kent Road to the north, Rodney Place and Rodney Road to the east, Wansey Street to the south, and Walworth Road and Elephant Road to the west	£393,387.10

Reference	Account No	Type	Address	Amount
associated works.				

BACKGROUND INFORMATION

1. Planning obligations under S106 of the Town and Country Planning Act 1990 are used to address the negative impacts caused by development and contribute to providing infrastructure and facilities necessary to achieve sustainable communities. These obligations can take the form of financial contributions and non-financial contributions and can cover a range of purposes.
2. Section 106 planning obligations are used to address site-specific impacts of developments, or where a developer does not meet planning policy requirements to provide certain infrastructure.
3. In addition, the Community Infrastructure Levy (CIL) allows local authorities to raise funds from developers undertaking new building projects in their area. This money is used to fund a wide range of local and strategic infrastructure projects needed to support growth and development in the borough.
4. The council's [S106 and CIL Supplementary Planning Document \(SPD\) 2015](#) (updated November 2020) sets out detailed guidance on the use of S106 planning obligations as well as CIL.
5. The Leisure Capital Programme has been developed to deliver a network of high-quality parks, open spaces, cultural and leisure facilities that benefit both existing and new communities. These provide community resources that meet the needs of local neighbourhoods. The programme includes the delivery of improvements to parks (to improve safety, accessibility, layout coherency, and to make them easier to maintain). Improvements enhance the aesthetic appeal of the area, as well as providing high-quality facilities for sport, play, and other leisure and cultural activities.
6. Elephant and Castle has seen significant investment over a number of years, which has contributed to the regeneration of the area. There is now an opportunity to invest in Victory Community Park, to ensure it meets the needs of residents and visitors.
7. In March 2014 the council's cabinet approved £1.3m of capital funding towards Victory Community Park as part of the wider £5.96m Elephant and Castle Opportunity Area parks and open spaces improvements programme.
8. The Victory Community Park project also secured £116,506 of S106 funding at Planning Committee on 25 May 2016 [from development 11/AP/0868 (2-10 Steedman Street)] for the purpose of upgrading sport and play provision in the park. See Appendix 1.

9. The Victory Community Park project will create a more accessible park by infilling the sunken multi-use games area ('MUGA') which is at present difficult for some people with a disability to access. A replacement MUGA will be provided at ground level.
10. The project also includes:
 - a) a fully refurbished play area with opportunities for children with disabilities to play alongside their friends;
 - b) new open lawn area;
 - c) additional and improved park entrances and perimeter railings, to create an attractive and welcoming park, and encourage visitors;
 - d) planting twenty-one trees;
 - e) new shrubs and hedges; and
 - f) better access to the nature area, with an additional entrance.
11. There is also an opportunity to increase the size of the park through land acquisition. The integration of a currently vacant plot of designated 'Borough Open Land' (BOL) that interrupts the park boundary at the corner of Rodney Place and Elba Place would deliver an increase in green space and improve recreation facilities for the local population, which is increasing. The land is however currently privately owned.

KEY ISSUES FOR CONSIDERATION

12. Victory Community Park is a local park in a densely populated neighbourhood within the Elephant and Castle and Walworth area, with a rapidly increasing population size. The area has a large black, Asian and minority ethnicity population, as well as high levels of ill health, childhood obesity, and socio-economic deprivation.
13. Improving the quality of parks, sport and play facilities is essential towards improving health and wellbeing, by encouraging residents to visit a local green space, use high quality facilities that they are proud of, and be physically active.
14. Improving parks has also been proven to have a positive effect on the local economy.
15. A design (Appendix 2) and construction cost plan estimate (Appendix 3) have been produced. The construction market is currently under increasing pressure, with rising supply chain, workforce and materials costs. In order to deliver the project within budget, construction should commence in September 2023 according to current programme, otherwise value engineering may be required.
16. The S106 agreement required the developer to pay an off-site sports and children's play provision contribution of £300,000 to the council on or before occupying 1,200 homes connected to their development. The sum was index

linked between the date of the S106 agreement and the date the sum was paid. As a result, the figure increased to £393,387.10.

17. In the S106 Agreement, the council covenanted with the developer that it would expend and apply the contribution towards off-site sports and children's play facilities provision. This was specifically defined as a multi-use games area to be provided by the council in accordance with the minimum up to date Sport England or such other sports or children's play facility in the vicinity of the Development and in such location as may be decided by the Council in consultation with the Developer. The council further covenanted with the developer that it would use reasonable endeavours to consult with the developer on a suitable location for the off-site provision within a reasonable walking distance from the development site and to have regard to their comments and to give specific priority (where practical and reasonable) to secure the off-site provision within Victory Community Park.
18. Other locations for the MUGA were considered and discounted. Other parks in the ward are Nursery Row Park and Sailsbury Row Park which are both ten minutes' walk further away from the Elephant Park development. Neither contain a suitable location for a MUGA, that is the recommended 30m distance from residential properties or without a significant loss of green space in these small local parks. Removing green space is not in line with our climate strategy and there could be objections from the local community or Friends Group. It should be avoided where possible.
19. A MUGA on the Browning Estate is in need of investment but is also located ten minutes' walk away from Elephant Park. A MUGA on a different housing estate would not be easy to find for Elephant Park residents. The final design for Victory Community Park including the location of the MUGA was shared with residents and stakeholders including LendLease prior to the planning application. The Public Realm Development Manager at Lendlease confirmed the design 'looked good' and welcomed the forthcoming planning application. The resident's main comments about the ball-court were regarding the specific layout and sports provision as described in paragraph 51 which has been addressed. There were also comments about liking the design and agreeing with creating an accessible ball-court. The Browning Estate MUGA is also much less than the recommended 30m distance from local properties, and disturbance to residents is likely.
20. On the Rockingham Estate, which is a five minute further walk from Elephant Park there is a basketball half court in need of investment. There is not space in this location to provide a full size MUGA.
21. The Open Space Strategy notes the deficit of open space local to Elephant Park in objective P3, and investing in the MUGA at Victory Community Park ensures that no green space is lost, in the local area, as part of this project. This is in line with our climate strategy.
22. The Victory Community Park project team have met with the LendLease Public Realm Development team on several occasions as the landscape

designs for both schemes have progressed. These meetings took place virtually in November 2020, May 2021 and June 2022. At each meeting the latest design revisions were shared. Discussions focussed around creating connected designs onto Rodney Place but also covered the wider open spaces including the MUGA, sports provision and play. LendLease expressed general approval of the evolving designs for Victory Park at these meetings.

23. Improving the sport and play facilities at Victory Community Park was deemed to be most beneficial to residents of Elephant Park and the local area, as it is located directly across the road, making it easy to find and convenient.
24. The improvement scheme in Victory Community Park includes replacement of the existing MUGA and replacement of the existing play area. Unfortunately, there is not enough space within the park to provide an additional MUGA or expand the children's play facility. However, improving the quality of the play area, and adjusting the access to the MUGA so that people in wheelchairs can use it, will allow these facilities to serve a larger and more diverse proportion of the local community.
25. There is not enough space to meet the Sport England specification requirements for the MUGA because the width of the park is not sufficient. The refurbished MUGA will be 30 metres in length and 15 metres wide (smaller than the recommended size (37m x 18.5m)). Sport England have however advised that if the width cannot be achieved, the length should be shorter, to allow for the same ratio.
26. The procurement process for a landscape contractor for the Victory Community Park project is in progress. Tenders have been returned. Cost plan estimates show that all of the current secured funding is expected to be spent. This sum is required to be spent on the MUGA and play facilities and will therefore be ring-fenced for these purposes.

Policy framework implications

27. The project is in line with Fairer Future Commitment Theme 5 - A healthier life, through improvement of green spaces and play facilities, to encourage use of parks and an active lifestyle. In Southwark the estimated cost of physical inactivity exceeds £17 million each year.
28. Parks and open spaces in Elephant and Castle generally scored lower than other parks in Southwark, with the quality of parks being assessed as below the borough standard. Satisfaction with open space was the lowest of any sub-area.
29. The council's Open Spaces Strategy notes this area of Elephant and Castle as being in greatest need of good quality open space to help address socio-economic issues.
30. The other elements of this project will help achieve the aims of the

Southwark Nature Action Plan (SNAP) by making nature accessible to all in Victory Community Park, and aiming for a biodiversity net gain across the project. Native trees, hedgerow, woodland flora and flowering species for pollinators are included in the design. This will be funded by the capital funding and not the S106.

31. The project is in line with the council's Sport and Physical Activity Strategy 2019 to 2023 by investing in our sport infrastructure, and contributing to creating a place where our residents love to live.
32. The project is in line with the following policies in the London Plan 2021:
 - a. 'Policy GG3: Creating a healthy city' and 'S5: Sports and Recreation', by including an improved playground and MUGA which will encourage active and healthy lifestyles. The existing MUGA will be replaced. The park is accessible and well-connected to public transport and networks for walking and cycling.
 - b. 'Policy S4: Play and informal recreation', by improving the play area, and increasing opportunities for children with disabilities to play alongside their friends. This will enable children and young people to be independently mobile.
 - c. 'Policy G4: Open Space', and 'G5 Urban Greening', by enhancing green space, increasing the size of the tree canopy and adding more planting.
 - d. 'Policy G6: Biodiversity and Access to Nature', by enhancing the habitat in Victory Community Park which is part of the SINC (Site of Importance for Nature Conservation) network. This is in line with the SNAP, and increases access to nature in an urban environment.
33. The play area has been designed taking into account 'Shaping Neighborhoods: Play and informal recreation, supplementary planning guidance September 2012' (see background documents); putting space, accessibility, inclusion, diversity, safety, and access to nature at the heart of our design, to create a playable environment that encourages healthy lifestyles.
34. The play area design also takes into account Play England's 'Planning for Play Guidance' (see background documents) by first considering the outcome objectives for play provision, involving the community in consultation, including inclusive play and seeking to break down barriers to play.

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

Community impact statement

35. Southwark is ranked 40th out of 326 local authorities in terms of deprivation and North Walworth is ranked as the most deprived ward in the borough.
36. Children living in households claiming out-of-work benefits can also be used as a measure of child poverty in a community. In North Walworth the figure is 24.8% which is higher than the Southwark average of 18.5% and the national average of 13.5%.
37. Improving Victory Community Park, including the play area and sports facilities will provide for families in North Walworth ward, who have some of the greatest need in the UK.
38. The improvements will also bring the park up to the standard of the local area, which has seen a large amount of private investment and development in recent years.
39. Victory Community Park is located adjacent to the Elephant Park development from which this S106 has been received; therefore the improved park facilities will be conveniently located for those who live and/or work in the new development.
40. The existing MUGA is already less than the recommended distance of 30m from the habitable façade of residential properties, according to guidance in the 'Fields In Trust: Beyond The Six Acre Standard'. Due to the small size of the park, the distance from properties cannot be increased, so the refurbished MUGA will be in the same location, and the risk of disturbance to local residents' remains, particularly as the use of the MUGA is likely to increase due to its improved quality.

Equalities (including socio-economic) impact statement

41. The park is located in North Walworth, which has a higher black, Asian and ethnic minority population (50%) than London (40.2%) and the UK (13.5%).
42. Black, Asian and ethnic minority people were under-represented in public consultations. Officers worked with the Friends of Victory Community Park to hand deliver consultations to surrounding housing blocks, for the second and third consultations, to widen participation. This had some success in increasing representations from people from ethnic minority backgrounds, from 13.4% during the second consultation, to 22% during the third consultation.
43. The Public Sector Equality Duty has been considered by undertaking an Equalities Impact Assessment (EQIA) of the design. The EQIA (see Appendix 4) recommended a wide range of improvements to the design, which have been implemented. The key recommendations taken forward are:
 - a) Park entrances have been designed to be wide, with a level threshold.

Once unlocked each day, the entrance gates are currently kept open, which is good practice for wheelchair, mobility scooter, and buggy access, and for older people who may find gates difficult to use.

- b) All entrances will have a clear opening that is a minimum of 1.2 m wide, and will be constructed in a similar style to the railings. The new railings and gates will have good visibility through them, to allow visitors to see each other approaching. These improved sightlines increase the feeling of safety, particularly for women and girls.
 - c) Existing steep gradients will be removed, such as those leading to the existing MUGA. Pathways will have hard surfacing with no gravel or loose fill.
 - d) Seating will accommodate space for wheelchairs, on both picnic benches and standard benches.
44. Play equipment has been designed to increase opportunities for children with disabilities to play alongside their friends.
 45. The existing sunken MUGA is not accessible for many people with disabilities including people in wheelchairs, due to the steep gradient on the access pathway. The EQIA supports infilling the sunken MUGA and providing a new MUGA at street level, with level access. The replacement MUGA will be wheelchair-accessible.
 46. The 'Sport England Sport for All Survey' report confirms that black adults and children are significantly over-represented in the participation base of basketball, relative to their population share.
 47. The 2014 Basketball All-Party Parliamentary Group Inquiry Report (see background documents) recommends improving basketball infrastructure in local communities. This was evidenced from Lewisham Basketball Club who saw their participation levels increase from a community session with 12 youngsters to now engaging more than 1,000 young people a year.
 48. On 16 February 2018 a House of Commons debate discussed 'the future of basketball in the UK' (see background documents). The lack of dedicated basketball facilities was discussed as a barrier to the growth of the sport. They also discussed the high black and minority ethnicity participation within the sport and the link with deprivation.
 49. Additional consultation was undertaken with coaches from the Southwark Legends basketball team who are from ethnic minority backgrounds in July and November 2021. They advised that the fact MUGAs are designed for both football and basketball limits opportunities for basketball, as basketball players often do not get a chance to play due to MUGAs being dominated by football. They advised on the ideal specification for basketball, and the opportunity to prioritise basketball at the MUGA was discussed, and they

were in favour.

50. The MUGA design was updated to prioritise basketball, with basketball hoops at both ends and a football goal at one end only. This would allow for football kickabouts to take place at the same time as a basketball pick-up game, using half of the MUGA each.
51. However during subsequent public consultation, some residents argued strongly to provide equally for football and basketball by providing two goals. As a result, the design no longer prioritises basketball, and has football goals at both ends.
52. Young people under the age of 24 were under-represented in the consultations. During the second public consultation only 5% of total responses were from this age group, compared to a local population of 35%. This increased to 21% in the third consultation, which may be a result of interest generated in the design of the MUGA.
53. A focussed consultation with young people in spring 2021 provided additional feedback, particularly on the MUGA.
54. We have ensured that the project provides facilities for young people, including an improved play area, the design of which is being developed in consultation with local children and families. It also includes a refurbished MUGA, adjacent seating area and table tennis tables, which are already popular in the park.
55. Older residents and pregnant people are provided with extra seating across the park and increased accessibility in and around the park due to the infilling of the MUGA. Signage and information in the notice boards will indicate the nearest public toilet facilities.

Health impact statement

56. There are significant inequalities in the prevalence of excess weight and obesity in Southwark; children from black ethnic groups are significantly more likely to be obese compared to other ethnic groups (see background documents: Childhood obesity in Southwark Southwark's Joint Strategic Needs Assessment). Levels of child excess weight (age 6) in North Walworth are recorded at 45.8%, which is higher than the Southwark, London and national averages.
57. The play area, MUGA, table tennis tables, and new open lawn will encourage local people to be physically active, which has associated health benefits.
58. Bringing the MUGA up to street level has the added benefit of allowing people in wheelchairs to use it and be physically active, where they could not previously, benefiting the health of people with disabilities.

59. Contact with nature and spending time in green spaces in a highly urban environment has also shown to have mental health benefits.

Climate change implications

60. All new landscaping and play equipment will, where possible, be sourced locally, and robust, recycled, and sustainable products will be used, including materials such as FSC-certified wood. Using high-quality products will reduce maintenance requirements and ensure a longer lifespan of the equipment.
61. A natural cork play area safety surfacing is proposed. This product has a high level of permeability compared to synthetic materials and can be up to 30% cooler in the summer, helping to reduce the urban heat island effect. Officers are aware of a cork play area safety surfacing which has a negative carbon balance when considering the carbon sequestration of cork oak forests and production-related emissions, which is even better than being carbon neutral.
62. The drainage strategy will reduce output into the sewer system. All new hard surfaces in the park will be permeable, and the MUGA constructed with an open-graded sub-base, which will act as a new soakaway. The existing drain will be closed.

Resource implications

63. Resources for the delivery of the project can be contained within current staffing.
64. The project is being managed by the Policy and Programmes team, which has extensive experience of delivering similar programmes in Southwark. Staffing and any other costs connected with this recommendation are to be contained within existing departmental revenue budgets.

Financial implications

65. The Victory Community Park improvement project currently has £1,416,506 of secured funding from council capital and S106 sources as shown in the table below.

Amount	Source	Status	Purpose
£116,506.00	S106 11/AP/0868	Secured	Public Open Space, Children's Play and Sports Development
£1,300,000.00	Council capital	Secured	Elephant and Castle Opportunity Area parks and open spaces improvements programme

Amount	Source	Status	Purpose
£1,416,506.00	Sub-total; secured funding only		
£393,387.10	S106 12/AP/1092	Unsecured	Off-site sport and children's play provision including a MUGA or children's play
£1,809,893.10	Total including unsecured funding		

66. Securing the S106 funding outlined in this report will increase the total project budget to £1,809,893.10.
67. This will be sufficient to deliver the scheme and mitigate risks with a suitable contingency.
68. After the improvements, maintenance of Victory Community Park will be contained within existing revenue budgets.

Consultation

69. Public consultation was undertaken in early 2020, autumn 2020 and autumn 2021. A further consultation specific to the play area design was undertaken in January 2023.
70. Reports detailing the first three public consultations and their impact on the design are available on the project webpage (see background documents). A report on the play area consultation is being drafted.
71. Additional consultation was undertaken with Southwark Legends basketball team in July and November 2021. See paragraphs 49 to 51 for more details.
72. Additional meetings were held with the Friends of Victory Community Park at their request, on several occasions during the consultation. This resulted in a number of adjustments to the design; the main ones being:
- a) committing to not changing the current night time gate-locking regime as part of this project,
 - b) increasing the height of the proposed new boundary railings to 1.4 meters from 1 meter,
 - c) improved security for the nature garden; the fencing will be replaced with better quality railings of the same 2 meter height, and controlled access kept in place,
 - d) adjustment of the layout of the MUGA, with the Friends and local residents being key in guiding the decision to no longer prioritise basketball, and to include football goals at both ends of the MUGA, despite the strong evidence regarding the lack of dedicated basketball facilities, described in paragraphs 45 to 46.
73. Planning application 22/AP/2455, which relates to the proposal, was approved at planning sub-committee on 15 March 2023.

74. A draft of this S106 release report was presented at a Strategic Lead Member Briefing for the Cabinet Member for Neighbourhoods, Leisure and Parks on 31 August 2023. The briefing was received without any required actions.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Assistant Chief Executive – Governance and Assurance

75. The council's constitution provides that it is the function of planning committee (major applications) to, amongst other things, consider the expenditure of funds over £100,000 of strategic importance secured through legal agreements under section 106 of the Town and Country Planning Act 1990.
76. The Equality Act 2010 introduced the public sector equality duty, which merged existing race, sex, and disability equality duties and extended them to include other protected characteristics; namely age, gender reassignment, pregnancy and maternity, religion and belief, and sex and sexual orientation, including marriage and civil partnership. In summary those subject to the equality duty, which includes the council, must in the exercise of their functions: (i) have due regard to the need to eliminate unlawful discrimination, harassment, and victimization; and (ii) foster good relations between people who share a protected characteristic and those who do not. The report considers equality issues, and the report confirms the proposals are not expected to have a detrimental impact on any particular protected group under the Equality Act 2010.

The Human Rights Act 1998 imposed a duty on the Council as a public authority to apply the European Convention on Human Rights; as a result, the Council must not act in a way which is incompatible with these rights. The most important rights for planning purposes are Article 8 (respect for homes); Article 6 (natural justice) and Article 1 of the First Protocol (peaceful enjoyment of property). The proposals are not expected to breach any of the provisions of the Human Rights Act 1998.

Strategic Director of Finance

77. This report seeks approval from the planning committee to release the sum of £393,387.10 from the agreement noted at paragraph 1, to fund the improvement of Victory Community Park.
78. The strategic director of finance and governance notes the supplementary advice from other directors, the financial and resource implications at paragraphs 64-69, and can confirm that the council has received the related s106 funds and they are available for the purposes outlined in this report.
79. Staffing and any other costs associated with this recommendation are to be contained within existing departmental revenue budgets.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Project webpage, including downloadable consultation reports	Southwark Council 160 Tooley Street London SE1 2QH	Matt Hill 020 7525 1604
Link: https://www.southwark.gov.uk/parks-and-open-spaces/projects-in-parks/victory-community-park		
Sport and Physical Activity Strategy 2019 to 2023	Southwark Council 160 Tooley Street London SE1 2QH	Tara Quinn 020 7525 0875
Link: https://www.southwark.gov.uk/leisure-and-sport/sport-and-physical-activity-strategy		
The London Plan 2021	City Hall Kamal Chunchie Way London E16 1ZE	Mayor of London 020 7983 4000
Link: https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf		
The London Health Inequalities Strategy	City Hall Kamal Chunchie Way London E16 1ZE	Mayor of London 020 7983 4000
Link: https://www.london.gov.uk/programmes-strategies/health-and-wellbeing/health-inequalities/london-health-inequalities-strategy		
Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance September 2012	City Hall Kamal Chunchie Way London E16 1ZE	Mayor of London 020 7983 4000
Link: https://www.london.gov.uk/sites/default/files/osd30_shaping_neighbourhoods_play_and_informal_recreation_spg_high_res_7.pdf		
Planning for Play: Guidance on the development and implementation of a local play strategy	Scrapstore House 21 Sevier St Bristol BS2 9LB	Play England info@playengland.org.uk

Link: https://www.playengland.org.uk/designforplay		
Fields In Trust: Beyond the Six Acre Standard	Woodstock Studios 36 Woodstock Grove London W12 8LE	Fields In Trust www.fieldsintrust.org
Link: https://www.fieldsintrust.org/Upload/file/guidance/Guidance-for-Outdoor-Sport-and-Play-England.pdf		
Southwark Open Spaces Strategy (2013)	Southwark Council 160 Tooley Street London SE1 2QH	Matt Hill 020 7525 1604
Link (please copy and paste into your browser): https://www.southwark.gov.uk/assets/attach/1897/3.1.1-Southwark open space strategy Jan 2013 low res .pdf		
Childhood obesity in Southwark: Southwarks Joint Strategic Needs Assessment January 2020	Southwark Council 160 Tooley Street London SE1 2QH	Publichealth@southwark.gov.uk
Link (please copy and paste into your browser): https://www.southwark.gov.uk/assets/attach/11717/Southwark-JSNA-2019-Childhood-Obesity.pdf		
Southwark Nature Action Plan (SNAP) 2020	Southwark Council 160 Tooley Street London SE1 2QH	Julian Fowgies Julian.Fowgies@southwark.gov.uk
Link: https://www.southwark.gov.uk/parks-and-open-spaces/ecology?chapter=3		
Sport for All? Why ethnicity and culture matters in sport and physical activity (January 2020), Sport England	Sport England Sport Park 3 Oakwood Drive Loughborough Leicestershire LE11 3QF	Sport England 0345 8508 508
Link: https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/2020-02/Sportforallreport.pdf?VersionId=td0pMbTNOs7caOjvMZ0HCRPwsl3jGnFA		
Debate pack for 'the future of basketball in the UK' held 20 February 2018	House of Commons Library Palace of Westminster London SW1A 0AA	papers@parliament.uk

Link: https://researchbriefings.files.parliament.uk/documents/CDP-2018-0034/CDP-2018-0034.pdf		
S106 legal agreements	Southwark Council 160 Tooley Street London SE1 2QH	020 7525 5403 planning.enquires @southwark.gov. uk
Link: https://planning.southwark.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=ZZZV1JKBWR520		
Southwark West Central area profile	Southwark Council 160 Tooley Street London SE1 2QH	publichealth@so uthwark.gov.uk
Link: https://www.southwark.gov.uk/assets/attach/10641/Multi-Ward-Area-Profiles-West-Central-Final.pdf		
2014 Basketball All-Party Parliamentary Group Inquiry Report	House of Commons Library Palace of Westminster London SW1A 0AA	papers@parliament.uk
Link: http://www.appgbasketball.org.uk/resources/APPGIquiryFinalReport.pdf		

APPENDICES

No.	Title
Appendix 1	S106 report To release £939,113 of section 106 monies towards improving the parks and open spaces in the Elephant and Castle and Blackfriars Road (25 May 2016)
Appendix 2	Victory Community Park improvements design
Appendix 3	Victory Community Park improvements cost plan estimate
Appendix 4	Equalities Impact Assessment (EQIA) report 2021

AUDIT TRAIL

Lead Officer	Pippa Krishnan, Programme Manager, Policy and Programmes team	
Report Author	Matthew Hill, Project Manager, Policy and Programmes team	
Version	Final	
Dated	9 October 2023	
Key Decision?	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments Included
Assistant Chief Executive - Governance and Assurance	Yes	Yes
Strategic Director of Finance	Yes	Yes
Cabinet Member	Yes	Yes
Date final report sent to Constitutional Team	25 October 2023	

Agenda Item 8

Item No. 8.	Classification: Open	Date: 25 May 2016	Meeting Name: Planning Committee
Report title:		To release £939,113 of section 106 monies towards improving the parks and open spaces in the Elephant and Castle and Blackfriars Road	
Ward(s) or groups affected:		Cathedrals, East Walworth, Faraday, Newington, and Borough Bankside and Walworth Community Council	
From:		Chief Executive	

RECOMMENDATION

1. That the Planning Committee agrees that the allocation of funds totalling £939,113 be released from the listed Legal Agreements associated with developments in the Borough, Bankside and Walworth Community Council area, towards delivery of six improvement projects as set out in paragraphs 13 to 52.

BACKGROUND INFORMATION

2. Planning obligations are used to address the impacts caused by development and contribute to providing infrastructure and facilities necessary to achieve sustainable communities. The council can enter into a legal agreement with a developer whereby the developer agree to provide planning contributions.
3. Section 106 payments are secured as part of the planning permissions for the developments set out in this report in order to mitigate the impact of large new developments on the Bankside and London Bridge and Elephant and Castle opportunity areas, and provide the infrastructure and services to support large new developments.
4. The proposed list of projects has been prepared by identifying section 106 funds available in the Borough, Bankside and Walworth Community Council and matching their purposes to priority projects from the community project bank and the Elephant and Castle Parks Programme.
5. The Elephant and Castle Parks Programme has been developed to deliver a network of high quality parks and open spaces that benefit both existing and new communities as part of the regeneration of Elephant and Castle. To provide community resources that meet the needs of local neighbourhoods and parks that are safe, accessible, coherent, easy to maintain and enhance the aesthetic appeal of the area.
6. Implementation of the programme is underway with successful completion of the new playground at St Mary's Churchyard in April 2015. A paved plaza with two new water features will be delivered in spring 2016 to coincide with opening of the Castle Leisure Centre and will further enhance this popular park.
7. This report seeks to allocate funding to support the Elephant and Castle Parks Programme and to specific open space projects in the environs of the new development at 128-150 Blackfriars Road. The proposals respond to feedback from the local community,

Councillors and local partnerships that the council should take a strategic approach to bringing separate historical section 106 legal agreements together to deliver a holistic programme of public realm improvements.

8. The proposal is to allocate section 106 receipts paid to the council by developers, to address shortfalls in existing investment in open spaces in the area. Whilst there is a capital budget to deliver the programme, this report seeks to secure available funding to enhance the quality of park improvements and offset the negative impacts of development.

KEY ISSUES FOR CONSIDERATION

9. In order to match available section 106 funding to priority projects in the programme, a mapping exercise was carried out to understand the distribution of unspent section 106 monies by "purpose".
10. The s106 monies already secured for Nelson Square Gardens is sufficient for the park's redevelopment that is currently underway. Significant CIL and site specific s106 contributions are being negotiated for Christchurch Gardens from the development at 18 Blackfriars Road.
11. With rapid population increase forecast, it is expected that larger parks and those with good transport links, outside of the immediate vicinity, will increasingly become destination parks for residents in north-west Southwark.
12. The project proposals are outlined below, together with the identified section 106 budgets and current funding available.

Project 1: Investment in public open space, children's play and sports development improvements in Geraldine Mary Harmsworth Park

13. The Elephant and Castle opportunity area has a limited range of open space provision, consisting mainly of small parks. Geraldine Mary Harmsworth (GMH) Park at the western boundary of the area is the largest in size at 6.5 hectares.
14. GMH Park accommodates a range of facilities including a sports pavilion, (servicing four tennis/ badminton courts and three multi use games areas), a small children's playground, world gardens, nature area, a peace garden and a refreshment kiosk, whilst retaining large expanses of amenity grass.
15. The park is well used by local families and schools, and attracts tourists throughout the year visiting the Imperial War Museum which lies at its centre. Whilst the park has several unique features, its many assets are blighted by a deteriorating infrastructure and the lack of a coherent design.
16. In 2016 the council will deliver works to refurbish the dilapidated former park keepers building at the St Georges Road entrance to the park. The project will ensure that this largely redundant building is bought back into public use as a staffed Park Office and information point for visitors.

17. The Imperial War Museum is currently implementing a redevelopment of its flagship branch at GMH. Phase 2 includes redesigning the building frontage to provide fully accessible entrance and access from the park.
18. New and potential developments at GMH Park have strengthened the need to develop and implement a master plan redesign of the park that will:
- Create a welcoming and cohesive major park for local people and visitors to IWM London
 - Create visual links around the park by employing a coherent palette of materials, planting and signage
 - Enhance circulation
 - Ensure a balance of quality facilities for all park users
 - Design out underused areas which currently attract anti social activity
 - Ensure improvements can be maintained within existing maintenance budgets.
19. The cost of development and implementation of a master plan design for GMH Park is estimated at £1.26m. A budget of £850k is currently available.
20. The project will be carried out by the parks team working in close consultation with the Friends of GMH, Imperial War Museum, sports operator and other key local stakeholders.
21. This report is seeking to allocate £416,051 towards improvements to GMH Park as follows:

Agreement Reference	Development address	Amount	Purpose
733 13/AP/3791	Valentine Place and Webber Street	£186,284	Public Open Space, Children's Play and Sports Development
579a 13/AP/1403	Stamford Street SE1	£4,082	Public Open Space, Children's Play and Sports Development
		£7,293	Public Open Space, Children's Play and Sports Development
		£18,392	Public Open Space, Children's Play and Sports Development
772 14/AP/1862	128-150 Blackfriars Road	£200,000	Public Open Space, Children's Play and Sports Development
		£416,051	
Capital Match Funding		£850,000	Budget of £519k
Total Budget Proposed		£1,266,051	

Project 2: Investment in public open space, children's play, sports and recreation facilities at Pullens Gardens

22. Pullens Gardens is a small park on the Pullens Estate in Newington Ward. The park occupies 0.3 hectares of land and falls within the Elephant and Castle opportunity area.
23. The Pullens Estate, built in the late 19th century, is now part of a larger residential area featuring both new and old housing stock. Amelia Street runs along the northern boundary of the park and leads directly on to the Walworth Road.
24. Whilst the park is surrounded by residential housing, it is rarely used by local families and is generally considered to be unattractive, unsafe and blighted by anti-social behaviour.
25. The only remaining equipment in the children's playground is an aging climbing frame and slide. The limited seating and furniture throughout the park is in poor condition and adds to the perception that the park has been neglected.
26. Investment is needed to deliver a re-design of the Pullens Gardens to enhance access and visibility, to reduce opportunities for anti- social behaviour and improve play provision.
27. The cost of re-designing Pullens Gardens is estimated at £600k. A budget of £500k is currently available.
28. The project will be carried out by the parks team working in close consultation with Pullens TRA and other key local stakeholders.
29. This report is seeking to allocate £91,152 towards improvements to Pullens Gardens as follows:

Agreement Reference	Development address	Amount	Purpose
600 (09/AP/1940)	89-93 Newington Causeway	£47,584	Public Open Space, Children's Play and Sports Development
551 (10/AP/2849)	Hand in Hand PH 37 Arch Street SE1	£3,580	Public Open Space, Children's Play and Sports Development
		£6,396	Parks and Public Open Space
		£15,609	Sport and Recreation Facilities
591 11/AP/2577	157-159 New Kent Road SE1	£17,983	Public Open Space, Children's Play and Sports Development
		£91,152	
Capital Match Funding		£500,000	
Total Budget Proposed		£591,152	

Project 3: Investment in sports and recreation facilities at Victory Community Park

30. Victory Community Park is a small (0.45 hectares) pocket park within the former Heygate Estate in East Walworth. Stretching east to west from Rodney Place to Balfour Street, this L shaped space includes a fenced nature area with a pond. Facilities in the main park include a children's' play area with equipment suitable for primary school aged children. A central sunken play space with marked football pitch and basketball hoops, dissects east

and west entrances to the park. An elevated boardwalk at the side of the ball court connects the two ends of the park.

31. Perimeter fencing of differing height, material and style, incongruous boundary lines and the park's current configuration, means its potential amenity value for new and existing residents is not fully realised.
32. Redevelopment in the immediate surrounding area now presents the opportunity through land acquisition to increase the footprint of the park.
33. The integration of the area of adjacent land that interrupts the park boundary at the corner of Rodney Place and Elba Place will deliver an increase in green space and improved recreation facilities.
34. Investment will contribute towards a significant upgrade of sport and play provision. Entrances and perimeter fencing will be replaced to create a uniform and attractive boundary.
35. The overall cost to redevelop Victory Community Park is estimated at £1.4m. A budget of £1.3m is currently available.
36. The project will be carried out by the parks team working in close consultation with local residents.
37. This report is seeking to allocate £116,506 towards improvements to Victory Community Park as follows:

Agreement Reference	Development address	Amount	Purpose
666 11/AP/0868	2-10 Steedman St SE17	£116,506	Sport & Recreation Facilities
Capital Match Funding		£1,300,000	
Total Budget Proposed		£1,416,506	

Project 4: Investment in public open space, children's play, and sport development at Nursery Row Park

38. Nursery Row Park is a popular local park measuring 1.7 hectares in East Walworth. Bounded by East Street market; existing council housing, and two new housing developments at Brandon Street and Stead Street, the park is a central space for respite in an area of increasing population density.
39. The park's location next to East Street market means that its southern boundary suffers from litter and overspill from traders stalls. The concrete planters near this entrance are intended for seating but poor design and failed planting means that they have largely become litter traps. The park entrance is further obstructed by a row of three telephone kiosks, (regularly used as makeshift WCs) and two unsightly utility boxes.
40. Investment will contribute to the relocation of these services and deliver significant improvement at the East Street entrance along with enhancements to the current play provision.

41. Landscape and playground improvements at Nursery Row Park are estimated to cost £800k. A budget of £750k is currently available.
42. The project will be carried out by the parks team working in close consultation with the Friends of Nursery Row Park and other key local stakeholders.
43. This report is seeking to allocate £47,752 towards entrance improvements at Nursery Row Park as follows:

Agreement Reference	Development address	Amount	Purpose
666 11/AP/0868	Steedman Street	£47,752	Public Open Space, Children's Play and Sports Development
Capital Match Funding		£750,000	
Total Budget Proposed		£797,752	

Project 5: Investment in landscaping and play project at the Peabody Estate, Blackfriars

44. Planning permission was granted on 18 December 2014 for the mixed use redevelopment of Hill and Erlang Houses at 128-150 Blackfriars Road to deliver 336 resident units with 2500sqm of office and 1200sqm of retail space. During the consultation for the redevelopment project, a number of meetings were held with the local community and some specific mitigation projects were identified which could be delivered in tandem with the redevelopment project for the benefit of both the existing residents and businesses and the future occupiers of the new buildings. Site visits were carried out in the local area, and potential environmental improvement projects were identified in the adjacent Peabody and Lancaster Street estates which could improve the quality of the open spaces, child's play and sports facilities. The initial commitment to make improvements to the adjacent estate during the planning process was formalised in the signed section 106 agreement for the redevelopment, which makes reference to the Peabody estate on Blackfriars Road.
45. The council has met with the Peabody estate managers, landscape design team and local residents to discuss a brief for the project, and to agree the broad scope of works. In 2015 the Peabody team funded and appointed LUC landscape architects to develop a design for consultation. Consultation has been carried out and the improvements which include new child's play, sports equipment and landscaping of the courtyards has been well received by the residents of the estate. A planning application is now being prepared in order to deliver the improvements during 2016/17.
46. This report seeks to commit £147,652 of funding from the Blackfriars Circus project to the landscape, child's play and sports development improvements within the Peabody estate.
47. The project will be carried out by the Peabody estate managers working closely with the residents. The Peabody team have also committed to match-funding the project through their time in-kind and by also seeking additional fundraising.

Agreement Reference	Development address	Amount	Purpose
772 14/AP/1862	128-150 Blackfriars Road	£147,652	Public Open Space, Children's Play and Sports Development
Total Budget Proposed		£147,652	

Project 6: Investment in Lancaster Street Estates environmental improvements

48. As set out in project 5, the consultation for the redevelopment of 128-150 Blackfriars Road included a commitment, formalised in the signed section 106 agreement, to make improvements to the Lancaster Street estates.
49. Lancaster Street lies immediately to the east of the development site and includes buildings in the City of London estate (Bazeley and Markstone Houses) and the councils' Lancaster Estate (Albury Buildings, Brookwood House, Lingfield House). The local charity Bankside Open Spaces Trust (BOST) has carried out a number of projects in the area, including the Brookwood Triangle at the north end of Lancaster Street which has become a successful communal garden with food growing, and the Diversity Garden, a well known community garden on Milcote Street. Some successful planting has also been installed in the City of London estate between Bazeley and Markstone Houses.
50. This project seeks to build on the successes of the recent community gardens, food growing and planting projects, and make further improvements to public gardens within the estates along Lancaster Street and in the adjacent streets including Boyfield, Silex and King James Street, subject to the wishes of the local residents. It is recommended that as an initial step the council will work with BOST, and local residents to set up a steering group to establish how local people would like to see improvements made. Once a brief has been established, some design work can be carried out, and works can be commissioned to improve the green spaces.
51. This report seeks to commit £120,000 of funding from the Blackfriars Circus project to the public gardens within the estates along Lancaster Street and in the adjacent streets including Boyfield, Silex and King James Street.
52. The project will be overseen by the regeneration team working closely with the housing department and will be carried out by charity Bankside Open Spaces Trust working with local residents.

Agreement Reference	Development address	Amount	Purpose
772 14/AP/1862	128-150 Blackfriars Road	£120,000	Public Open Space, Children's Play and Sports Development
Total Budget Proposed		£120,000	

Policy implications

53. These areas currently have the highest population density in the borough and the second highest proportion of housing units with no access to private open space.
54. Whilst it is recognised that the pressure to create new homes means that there are limited opportunities for the creation of new green spaces, Southwark's Open Space Strategy (2013) sets out the council's commitment to maintain and improve existing parks and open spaces to ensure that those that live and work in the borough experience the positive benefits associated with health and well-being, quality of life and cohesive communities that open spaces provide.

55. Delivering this programme of open space and public realm improvements within the London Bridge Bankside and Elephant and Castle Opportunity areas will support the implementation of a number of Southwark's key strategic priorities. This includes but is not limited to the following policies:

56. The Core Strategy 2011

- Theme 2: Making the borough a better place for people:
 - Strategic Objective 2F is to conserve and protect historic and natural places. Southwark's heritage assets and wider historic environment will be conserved and enhanced. Open spaces and biodiversity will be protected, made more accessible and improved.
- Theme 5: Planning for development in growth areas
 - Strategic Objective 5A commits to developing growth areas to achieve the vision of improved places and to prioritise development in the following areas:
 - Central Activities Zone
 - Elephant and Castle opportunity area
 - Bankside, Borough and London Bridge opportunity area
 - Peckham and Nunhead action area
 - Canada Water action area
 - Aylesbury action area
 - Camberwell action area
 - Old Kent Road action area.
- Strategic Policy 1: Sustainable Development
- Strategic Policy 4: Places for learning enjoyment and healthy lifestyles
- Strategic Policy 11: Open Spaces and Wildlife
- Strategic Policy 12: Design and conservation.

57. Southwark's Elephant and Castle Supplementary Planning Document (SPD, 2012)

This document sets out the council's vision for the Elephant and Castle Opportunity area and provides a framework to guide development over the next 15 years, ensuring that regeneration is coordinated and sustainable.

58. Southwark's Open Spaces Strategy (2013)

This strategy identifies Elephant and Castle as an area of deficiency in the amount of natural green space available, with just 0.38ha per 1,000 population. Taking account of population increases expected in the area the ratio is likely to fall to 0.31ha per 1,000 population in 2026. (Southwark OSS 2013) This falls significantly short of the local planning standard to achieve 1.5ha of green space per 1,000 population.

Community impact statement

59. Delivering a range of environmental improvement projects that protect public open spaces and enhance the public realm, within the context of rapid development and population growth, is essential to the health and well being of residents.
60. The creation of high quality open spaces will contribute to making Blackfriars Road and the Elephant and Castle places where people choose to live and work.

Resource implications

61. The funding will come from S106 agreements as outlined above and set out in the summarised S106 finance concurrent report below.
62. The projects will be project managed by the Parks department. No additional staff time will be required.

Equal opportunities

63. This programme of projects has been designed to be fully accessible to all, without prejudice or discrimination.

Consultation

64. The programme proposes projects which have been identified through consultation with internal and external stakeholders.
65. Regular and on-going consultation is underway for each project. This includes but is not limited to:
 - Ward Councillors
 - Friends Groups
 - TRAs and Neighbourhood forums
 - Local residents and business owners
 - Schools.
66. Consultation will include stakeholder input in the design brief; will continue through each stage of the design process and at regular intervals during implementation.
67. For each project a detailed community consultation plan will be implemented that will involve the following:
 - Local and park based consultation events
 - Postal distribution of project proposals
 - Online and postal feedback forms
 - Presentations at stakeholder groups meetings
 - Posters displayed at community and park notice boards
 - Proposal exhibit at local community centres and/ or schools
 - Regular ward councillor and cabinet member briefings.

Sustainable development implications

68. All projects will enhance urban greening and reduce the urban heat island effect. As many existing materials as possible will be re-cycled and re-used within the design.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Director of Planning

69. All of the contributions noted in this report have been received and are unallocated. Each of the proposed allocations would provide mitigation for the funding development and as such are supported.
70. Each legal agreement has been reviewed to ensure the proposed allocation accords with the agreement.

Director of Law and Democracy

71. The report asks for authority to release funds totalling £939,113 from a number of planning section 106 Agreements to assist with six parks improvement projects in the Borough, Bankside and Walworth areas.
72. The rapid progress with, in particular, the redevelopment of the site at 128–150 Blackfriars Road which extends to St Georges Circus has resulted in the early payment of some of the financial obligations to the Council. In the case of each of the section 106 Agreements mentioned in the report, the amounts listed in the report were paid by the developer to the Council by way of planning obligations in order to mitigate against the impact on the local infrastructure caused by the development of the particular site.
73. It would be unlawful for any of the monies reserved within a planning agreement to be spent on any project outside the specific terms envisaged by the terms of the agreement. In the case of each of the 6 projects outlined in this report, the terms of the section 106 Agreement have been reviewed and it is confirmed that the proposed expenditure is consistent with the relevant agreement.
74. Since the amount requested is more than £100,000, the decision falls to be determined by a council planning committee in accordance with paragraph 2, part 3F of the constitution.

Strategic Director of Finance and Governance

75. This report requests the planning committee to approve the release of £939,119 S106 funds from the various legal agreements detailed in this report towards improving the parks and open spaces in the Elephant and Castle and Blackfriars Road.
76. The strategic director of finance and governance notes the council has received the S106 funds and that they are available for the projects outlined in this report. Use of the S106 funds will be monitored as part of the council's capital programme.
77. Staffing and any other costs connected with this recommendation are to be contained within existing departmental revenue budgets.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
S106 Legal Agreements	Planning Division, 160 Tooley Street, London SE1	Jack Ricketts 020 7525 5464

APPENDICES

No.	Title
None.	

AUDIT TRAIL

Lead Officer	Rebecca Towers, Head of Parks and Leisure	
Report Authors	Deborah McKenzie, Parks Service Development Officer Dan Taylor, Programme Manager, Regeneration	
Version	Final	
Dated	12 May 2016	
Key Decision?	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments sought	Comments included
Director of Law and Democracy	Yes	Yes
Strategic Director of Finance and Governance	Yes	Yes
S106 Manager	Yes	Yes
Date final report sent to Constitutional Team		12 May 2016



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CLIENT: Southwark Council
 PROJECT TITLE: Victory Community Park
 DRAWING TITLE: Illustrative GA
 DRAWING STATUS: For Planning

DATE: 07.01.22
 DRAWN BY: CP
 CHECKED BY: JT
 SCALE: A1

REVISION: A

DRAWING NUMBER: TM-458-LA 101
 TURKINGTON MARTIN LANDSCAPE ARCHITECTS

- NOTES:**
- The drawing is to be read in conjunction with all relevant contracts and specifications. It is to be used as a guide only and is not to be taken as a final specification. It is to be brought to the attention of Turkington Martin Landscape Architects in writing before commencing on site.
 - The contractor is to check and verify all levels and dimensions before commencing on site.
 - All dimensions in mm, unless otherwise stated.
 - Do not scale from this drawing.
 - All materials and concrete design and specification to engineer's details. All drawings provided here are purely illustrative.
 - Interpretation of any element to be specified by client.
 - All proposed products to be installed in accordance with manufacturer's instructions. Only plants and plants should be ordered to suit the area in accordance with scheduled plant database.
 - Any proposed plant substitution shall be agreed with the landscape architect prior to ordering.

NO.	DATE	BY	DESCRIPTION	APPROVED
1		CP	Change to layout proposal	
2		JT		

- KEY**
- Better footpaths, new improved path surface materials and new benches
 - New plants with increased biodiversity next to Rodney Place
 - New large, flat open lawn, created for everyone to sit and relax, play games or exercise
 - Boundary to nature area improved with hedge/shrub plants with additional new entrance from within the park. The high fencing will remain
 - New ball court with focus on basketball. Hoops at both ends and football goal at one end only
 - Table tennis area with curved seating as a barrier to the path materials and colours
 - Improved play area with natural materials and colours
 - New picnic benches / seats in paved spaces accessible for people with disabilities
 - Keep and improve the world garden zone with new plants and signs
 - Attractive lower metal railings at 1.4 metres high around the park boundary, and new plants all to make the park and the entrances more welcoming
 - Create one new improved entrance at the corner of Victory Place and Balfour Street removing the two current entrances
 - Create one new improved entrance at Muntion Road

Victory Park**Budget Estimate.1st December 2021. Updated 31st August 2022****Construction Costs**

	Measure	Unit	Rate	Total	Section Total
General site clearance of rubbish etc		item		<u>3,300.00</u>	3,300.00

Removal of Play equipment, furniture etc

Walkway	1	no	7,500.00	7,500.00	
Climbing frames	2	no	1,000.00	2,000.00	
Swing sets	2	no	620.00	1,240.00	
Roundabout	1	no	600.00	600.00	
Springers	2	no	90.00	180.00	
Individual bench	9	no	105.00	945.00	
Brick bench	3	no	235.00	705.00	
Concrete bench	3	no	235.00	705.00	
Picnic table	1	no	110.00	110.00	
Long concrete bench	6	no	235.00	1,410.00	
Table tennis table	1	no	320.00	320.00	
Muga goal structure	2	no	520.00	1,040.00	
Basketball post	1	no	2,600.00	2,600.00	
Boundary fencing and gates	253	m	20.00	5,060.00	
Bow top fence and gates to play area and at end of Mugas	74	m	11.00	814.00	
Timber retaining wall 1.6m high	13	m	62.00	806.00	
Concrete steps	1	no	1,050.00	1,050.00	
All paved areas including Muga and surrounds and rubber safety surface	750	m ²	11.00	8,250.00	
Break up existing Muga base prior to filling	520	m ²	3.00	1,560.00	
Circular raised planter and seat	1	no	1,200.00	1,200.00	
Shrub removal	400	m ²	11.00	<u>4,400.00</u>	42,495.00

Excavation and Earthworks

Excavation and ground shaping to new layout (minimal cart away due to filling requirement)		item		5,600.00	
Excavation for planting beds and grass areas	375	m ³	12.50	4,687.50	
Mass fill Muga with imported type 3	1715	m ³	57.00	97,755.00	

Victory Park**Budget Estimate.1st December 2021. Updated 31st August 2022****Construction Costs**

	Measure	Unit	Rate	Total	Section Total
Type 3 subbase to paths and play surface 100 - 225mm	190	m³	70.00	13,300.00	
Low nutrient soil to wildflower areas	35	m³	85.00	2,975.00	
Imported topsoil to planting beds and lawn areas	145	m³	57.00	<u>8,265.00</u>	132,582.50

Surfacing

Aluminium path edgings (kinley) to paths and play surface	420	m	60.00	25,200.00	
Concrete path edging	260	m	30.00	7,800.00	
Terrabase vehicle grade surface	440	m²	95.00	41,800.00	
Terrabase pedestrian grade surface	280	m²	82.00	22,960.00	
Play safety surface wetpour (Nikegrind)	400	m²	100.00	40,000.00	
Macadam surface to Muga with acrylic coating and line markings	450	m²	65.00	<u>29,250.00</u>	167,010.00

Railings and gates

Lang and Fulton Moderna 1.4m high	260	m	127.00	33,020.00	
Double gate 3000mm wide to match	4	no	1,620.00	6,480.00	
Alpha Rail vertical bar fencing 1m high	50	m	120.00	6,000.00	
Easygate 1290mm wide x 1m high	2	no	2,350.00	4,700.00	
Zaun Duo8 Muga fencing 3030mm high	28	m	286.00	8,008.00	
Zaun Duo6 Muga fencing 3030mm high	56	m	260.00	14,560.00	
Single gate 1290mm wide to match	2	no	1,100.00	2,200.00	
Curved corner panels	2	no	650.00	1,300.00	
Zaun Perimeter 6 fence to nature area 2000mm high	104	m	210.00	21,840.00	
Single gate to match	1	no	975.00	975.00	
Double gate 2500mm wide and feature arch	1	no	4,420.00	4,420.00	
Precast concrete retaining walls 600mm high	24	m	1,260.00	<u>30,240.00</u>	133,743.00

Furniture & Equipment

Bailey Streetscene Greengate seat	8	no	1,680.00	13,440.00	
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Victory Park**Budget Estimate.1st December 2021. Updated 31st August 2022****Construction Costs**

	Measure	Unit	Rate	Total	Section Total
Bailey Streetscene Hyde benche					
5030mm	1	no	16,680.00	16,680.00	
5500mm	1	no	17,150.00	17,150.00	
7650mm	1	no	2,200.00	2,200.00	
8000mm	1	no	22,200.00	22,200.00	
Bailey Streetscene Greengate picnic table	3	no	3,600.00	10,800.00	
Eibe ref 5620370 table tennis table	1	no	2,530.00	2,530.00	
Kompan Multigoals 3m high ref FRE601401-0901	1	no	5,410.00	5,410.00	
Kompan basketball net ref FRE3022	1	no	2,450.00	2,450.00	
Steel entrance totem signage	3	no	2,400.00	7,200.00	
Duncan and Grove ref n23	1	no	20,520.00	20,520.00	
Hags Spinmee inclusive roundabout ref 8062101	1	no	7,120.00	7,120.00	
Duncan and Grove swing (PL4)	1	no	6,120.00	6,120.00	
Duncan and Grove toddler swing (PL3)	1	no	6,240.00	6,240.00	
Timberplay large spinner	1	no	6,175.00	6,175.00	
Duncan and Grove climbing frame n21	1	no	58,440.00	58,440.00	
Timberplay Swinging Horse rocker	2	no	1,700.00	<u>3,400.00</u>	208,075.00

Soft Landscaping

Relocate existing trees including all accessories	13	no	1,100.00	14,300.00	
Specimen tree planting including all accessories	10	no	3,300.00	33,000.00	
Shrub planting with 5L plants, 5no per m ²	230	m ²	66.00	15,180.00	
Native hedge planting	365	m ²	66.00	24,090.00	
Improvements to world planting border with 1no 25L specimen shrub per m ²	110	m ²	55.00	6,050.00	
Wildflower turf	170	m ²	22.00	3,740.00	
Rolawn Medallion turf	740	m ²	7.00	5,180.00	
Make good existing lawn area and edges		item		1,500.00	
12 months maintenance to amenity and wildflower grass, shrubs and hedges		item		11,500.00	
3 years maintenance and defects & liability period for trees		item		<u>8,000.00</u>	122,540.00

 809,745.50

Victory Park**Budget Estimate.1st December 2021. Updated 31st August 2022****Construction Costs**

	Measure	Unit	Rate	Total	Section Total
Preliminaries	20	wks	3,600.00	72,000.00	
Overheads & Profit		12%		<u>97,169.46</u>	169,169.46
Sub Total					978,914.96
Provisional allowance for increased costs from August 2022 to June 2023. Allow 15%					<u>146,837.24</u>
Total Current Construction Cost					<u><u>1,125,752.20</u></u>
Contingencies		10%			<u>112,575.22</u>
					<u><u>1,238,327.42</u></u>

Exclusions

- Site Survey Costs
- Planning Fees & Costs
- Legal Fees
- Professional Fees
- Section 106, 278, 247, 104 or CIL contributions
- Archaeological Costs
- Services diversions
- Ground Contamination
- Work in connection with unexploded bombs
- Work in connection with lighting and electrical
- Works to foul / surface water drainage
- VAT



Equalities Impact Assessment & Access Design Appraisal

Southwark Council – Victory Community Park

Date: February 2021
CAE ref: 2021J347

Centre for Accessible Environments
Holyer House
20–21 Red Lion Court
London EC4A 3EB
020 7822 8232
info@cae.org.uk
www.cae.org.uk



1. Background & brief

Victory Community Park is located between Rodney Place, Munton Rd, Balfour St and Victory Place in London SE17. The park is approximately 4700 m² or 1.16 acres in size. Victory Primary school is on the south-west boundary of the park, with residential apartments and housing to the south, east and north. To the west lies Elephant Park, and a large mixed-use development under construction (completion December 2024). Within the general footprint of the park, but not publicly accessible, lies a nature area managed by Southwark Council & the Friends of Victory Community Park and a boarded up area of private land.

The park has five pedestrian entrances and is accessible from every street facing boundary. It has one vehicle entrance that providing access to half of the park. There are no buildings in the park, but it contains varied infrastructure and park facilities - a sunken hard standing ball-court with sloped and stepped paths to access; a pedestrian footbridge linking the two higher ends of the sunken area, currently closed due to structural safety concerns. There is a play area, mounded grass areas and picnic tables, and bespoke seating. The park is currently locked every night by the Rangers service, according to seasonal opening hours.

Victory Community Park requires a complete re-design reducing fencing, improving sport and play provision, enhancing planting and improving access, visibility and path network including addressing the issue of the pedestrian footbridge.

The design objectives are:

- The provision of a high quality, welcoming and safe playground offering diverse and innovative play opportunities for a range of ages and abilities.

- Value, quality and scope added to the sports provision (currently an important local facility provision of football, basketball and table tennis). The need to repair the bridge is an opportunity to repair the existing, design a new bridge or potentially raise the existing sunken area ball court.
- To replace the current fencing and gates, which are unwelcoming and create a negative initial impression of the park.
- To reduce opportunities for crime and anti-social behaviour and increase perceptions of safety in the park, which could increase female visitor numbers.
- Enhance the horticultural interests and biodiversity within the park, by including the existing natural area/nature garden in the wider park landscape, visually as a minimum and possibly physically by opening up/increasing public access.
- Develop the park without increasing revenue costs, ensuring designs while creative are robust and low maintenance.

The scheme should enable easy access for people with disabilities or limited mobility, and fully meet the requirements of the Equality Act. Particular user groups would include older people and parents with young children, as well as provision for wheelchair-users and people with limited or partial sight.

The scheme will include appropriate surface treatments, sensitive placement of furniture, initiatives to aid interpretation of park elements, and other measures to aid equality of access and enjoyment.

The Equality Act Protected Characteristics that are potentially impacted by a purely physical space are Disability, Age and Pregnancy & Maternity – all of which are affected by access to the space and the facilities provided. Sex, women in particular, may also be impacted by safety or security considerations. The provision of sanitary facilities would increase the potential impact to include additional characteristics such as Religion/Belief and Gender/Sexual Orientation, but there are no sanitary facilities provided within the park.

This review was undertaken by Teresa Rumble, Senior Access Advisor at the Centre for Accessible Environments, in February 2021, with consideration of the proposal plans provided, public consultation reports and a site visit.

A public consultation was undertaken at the beginning of the project, to allow the public to shape the designs and direction of the project from the start. This public engagement took place from Monday 13th January 2020 to Sunday 9th February 2020 with an online survey and two public drop-in sessions held in the park.

A second public consultation took place from Friday 18 September to Wednesday 28 October 2020 with an online survey open for responses. A public online consultation meeting was held on Wednesday 21 October from 6:30pm to 8pm. This session was held on Zoom and run by the Project Manager and Landscape Architect.

Both consultation reports are appended to this document and reference is made to comments as required throughout.

It is recommended that stakeholders, local community and access groups are consulted in the design/refurbishment process to review impact and ensure an inclusive design. The consultations noted above are welcomed and CAE would also encourage follow-up events and communications to assess the impact and usage of any new design.

2. Abbreviations

- **AFL** - Above floor level (or height above ground or the finished floor surface)
- **ECW** - Effective clearance width (as in the dimension of the door opening clear of any projections from the face of the door such as door furniture and weather boards)
- **LRV** – Light Reflectance Value (the measurement of the tonal value of a surface material)
- **BS8300** – British Standard codes of practice

3. EIA & Design Appraisal – Victory Community Park

CAE Comment	Protected characteristic impact:			
	Disability	Age	Pregnancy & Maternity	Sex
3.01 Park approach				
<p>Description Pedestrian access to the park itself is mixed, with the entrance on Victory Place in particular having a very generous pavement width and appropriate dropped kerbs and tactile warning surfaces.</p> <p>However, the access could be improved in other places and should be considered along with designs for the interior. For example, the current pavement has some obstacles to general access, e.g. Muntion Road has informal unidentified dropped kerbs at each end, plus signage posts/ticket machine reducing the pavement width in places along its length. There is also a narrow pinch-point on the pavement width currently caused by green hoarding on Rodney Place, and the entrance to the nature area of the park on Elba Place is inaccessible (narrow pavement, lack of dropped kerb, gateway width).</p>	✓	✓	✓	

CAE Comment	Protected characteristic impact:			
	Disability	Age	Pregnancy & Maternity	Sex
Sufficient pavement widths and clear vision is a safety concern for any vulnerable people and those caring for them and the width of any path is now a health and safety concern with regards to Covid-19 and the need to maintain social distancing. This concern is expected to be on going for many people, particularly those with the Protected Characteristics being considered.				
<p><u>Pavements</u> Pavement widths should be <u>at least 1200mm</u>, although 1800mm is preferable. A width of 2000mm would accommodate larger electric mobility scooters.</p> <p>Clear widths should also be maintained up to a height of at least 2.5 m above ground level, as vegetation along access routes can be a particular hazard to people with visual impairments.</p> <p>Pavements should be level or gently sloping, and the surface should be firm, slip-resistant and reasonably smooth.</p> <p>Pavements should have a detectable demarcation which can be followed by people who are blind or partially sighted, for example a kerb edge, and visual contrast should also be provided.</p>	✓	✓	✓	
<p><u>Dropped Kerbs</u> Dropped kerbs, meeting all the standards detailed in BS8300 and not less than 1200mm in width, should be provided on corresponding sides of the carriageway to enable wheelchair and mobility scooter users, those pulling shopping trolleys and those pushing prams and pushchairs to safely cross the carriageway and</p>	✓	✓	✓	

CAE Comment	Protected characteristic impact:			
	Disability	Age	Pregnancy & Maternity	Sex
<p>access the park.</p> <p>Concerns regarding dropped kerbs were raised as general comments in the 2nd public consultation, with Southwark Council committing to ensuring provision in the right places.</p> <p>There appears to be a blue badge parking space on Balfour Street, but no adjacent dropped kerb to enable access onto the park side of the road, which would necessitate a wheelchair user leaving the vehicle from the roadside to travel down the road vehicle carriageway to the Victory Place end.</p>				
<p><u>Seating adjacent to the park</u></p> <p>A metal bench currently positioned on the corner of Balfour Street and Victory Place is on a loose surface material, unsuitable for a wheelchair-user or people who are otherwise mobility impaired.</p> <p>The surface should be firm, slip-resistant and reasonably smooth – grass, bare earth, sand, bark or un-bonded gravel should not be used.</p> <p>Seating should be located so that it and its users do not reduce the access route width recommended when in use by a variety of people, including those with shopping or buggies and people using mobility aids or assistance dogs, and there should be space <u>alongside</u> to allow wheelchair users to be integrated within the general seating provision.</p>	✓	✓	✓	

CAE Comment	Protected characteristic impact:			
	Disability	Age	Pregnancy & Maternity	Sex
Seating should visually contrast with the background against which it is seen and it should not have a highly reflective finish.				
<p>Cycle Parking</p> <p>Cycle parking is currently located outside of the part itself on the corner of Balfour Street and Victory Place, with cycle stands contrasting visually with the background against which they are seen, as recommended.</p> <p>The area would benefit from tactile surface treatment to enable visually impaired people to identify the cycle parking area.</p> <p>The space provided appears to take into account the different types and sizes of cycle that exist, including adapted cycles such as hand cycles, upright and recumbent tricycles, tandems and solo cycles with adaptations to suit the rider's specific needs, as these can be considerably larger than other cycles.</p> <p>The cycle stands or bike racks are positioned so that when in use (i.e. when a cycle is placed on one of them), they do not reduce the access route width below that recommended in above.</p> <p>Comment regarding cycle parking is included in the 2nd public consultation report, with Southwark Council commitment that this would be included in a refurbished park design. This would be welcomed to enable any park user to keep their cycles/mobility aids in view. The recommendations above regarding space, visual contrast and tactile properties would still apply.</p>	✓	✓		

CAE Comment	Protected characteristic impact:			
	Disability	Age	Pregnancy & Maternity	Sex
3.02 Park entrance				
<p>Description Pedestrian gates are currently kept open once they have been unlocked each day, which is good practice for wheelchair and buggy access. This also improves access for older people, who may find heavy or fiddly gates difficult to negotiate.</p> <p>Current signage attached to the gates and fencing in various places appears messy and inconsistent, which can create confusion as well as presenting unnecessary visual clutter.</p>	✓	✓	✓	
<p>Gates Comments regarding the locking of gates each night were received from each public consultation: ...no longer locking the park received split opinions, with equal numbers of people both in support and not in support... Victory Park has been locked at dusk for the past 5 years, originally to address antisocial behaviour issues at the time. The fencing is unusually tall for a public park and in poor condition.</p> <p>Along with better located entrances, replacing with regular height fencing (about 1 metre high) would improve views into the park, encouraging more people to come in. Improving views looking out of the park would also make it feel safer.</p> <p>Almost all parks in Southwark are not locked at night and low fences are not intended for security so locking them becomes ineffective.</p>	✓	✓	✓	

CAE Comment	Protected characteristic impact:			
	Disability	Age	Pregnancy & Maternity	Sex
<p>Experience has shown that opening up views can reduce antisocial behaviour. Entrances with gates may also be difficult for some people with disabilities...</p> <p>BS8300-1:2018 states that any side-hung gate on an accessible route should be capable of opening in both directions and should be easy to open with either hand. The gate should also be self-closing - a gate that is self-closing under its own weight is preferable to one with a sprung hinge.</p> <p>The catch to any gate should not require the user to have to pinch or twist their hand to operate, and a catch that can be operated with a clenched fist is best.</p> <p>All gates should be a minimum of 1000mm wide and should be of open construction to allow a user to see another approaching from the opposite side. There should be a 300mm clear space to both the pull and push sides of the leading edge of a gate, to enable access by a wheelchair-user.</p> <p>If the gates are to be left unlocked beyond dusk, the recommendation would be to provide artificial lighting - see comments below.</p>				
<p><u>Entrance signage</u> Signage should be prominently located at each entrance, and be clear and easy to read. Information and signage should be located where it is clearly identifiable and visible from all directions, but positioned to allow people to stop and study without restricting</p>	✓	✓	✓	✓

CAE Comment	Protected characteristic impact:			
	Disability	Age	Pregnancy & Maternity	Sex
<p>access routes. On gates that are held open, it is obviously preferable to have signage adjacent on fixed fencing, to ensure that it is always visible.</p> <p>The location of, and routes to, key accessible facilities such as nearby parking and sanitary facilities, should be clearly indicated and include distance information as well as opening times. This is especially important as there are no sanitary facilities provided in the park itself. For example, there are publically accessible toilets nearby at Walworth Library (5mins walk) and The Castle Leisure Centre (10mins walk).</p> <p>Directional signs should specifically identify routes that are accessible and step-free, and should give as much information as possible to assist people in planning and navigating their route, including distances and gradients where appropriate.</p> <p>The shape, materials, colour and typeface of signs should be consistent throughout an area. Recommendations for the design and size of lettering and symbols are given in BS8300-2:2018, 12.3.1. The Sign Design Guide also gives recommendations for information and signage.</p> <p>Visual signs should use simple words, clearly separated from one another, in short sentences. Sentences or single word messages should begin with an upper case letter and continue with lower case letters. Block capitals should not be used. Sans serif typefaces are preferable.</p>				

CAE Comment	Protected characteristic impact:			
	Disability	Age	Pregnancy & Maternity	Sex
<p>Regular cleaning and maintenance of signage and information panels, including cutting back of surrounding foliage, is necessary to ensure that they remain clearly legible and up to date.</p> <p>Signage should be displayed within a height band of 1100-1600mm AFL.</p>				
3.03 Paths				
<p>Description</p> <p>The park currently has a variety of paths types, which are predominantly level although puddling of water may occur in places in wet weather. The surface materials vary, but are predominantly firm.</p> <p>The path widths are mostly adequate, but could be improved in places, and the edges of the paths are often undefined, creating a risk of rolling inadvertently onto grass or mud.</p> <p>Noted in the public consultations is the comment that 'the fact the bridge is broken discourages people from taking a pleasant short cut through the park. Some feedback suggested that due to it being closed for several years people had become accustomed to walking a different route.'</p>	✓	✓	✓	
<p>Path Width</p> <p>Paths should be at least 1200mm wide, although 1800mm would be preferable. A width of 2000mm would accommodate larger electric mobility scooters, which are now used more frequently. The tyres of a larger mobility scooter would usually be able to navigate</p>	✓	✓	✓	✓

CAE Comment	Protected characteristic impact:			
	Disability	Age	Pregnancy & Maternity	Sex
<p>the grass adjacent to the path, but this would cause the path edge to become muddy and indistinct, causing potential difficulties for other park users.</p> <p>Where the surface width of an access route is less than 1800mm, passing places should be provided to allow two wheelchair users to pass each other. Passing places should also be provided at junctions along an access route.</p> <p>A passing place should be 2000mm long by 1800mm wide and located within direct sight of another passing place.</p> <p>Sufficient path widths and clear vision throughout is also a safety concern for any vulnerable people and those caring for them.</p> <p>Improving sightlines across the park, to help reduce antisocial behaviour issues, was included in the comments for the 2nd public consultation.</p> <p>As already stated, the width of any path is now a health and safety concern with regards to Covid-19 and the need to maintain social distancing. This consideration is expected to be on-going for many people, particularly those with the Protected Characteristics being considered. Narrow paths that require people to step off to allow others to pass are particularly challenging for those with mobility disabilities and people who are visually impaired.</p>				

CAE Comment	Protected characteristic impact:			
	Disability	Age	Pregnancy & Maternity	Sex
Clear path widths should be maintained up to a height of at least 2.5 m above ground level. Overhanging vegetation along access routes can be a particular hazard to those with visual impairments.				
<u>Path Surface</u> The surface of all paths should be firm, slip-resistant and reasonably smooth – grass, bare earth, sand, bark or un-bonded gravel should not be used.	✓	✓	✓	
<u>Paths general</u> Paths with rounded corners at path junctions will aid circulation and manoeuvrability around the park. Paths should be level or gently sloping. Concept design 3 shows level access throughout the park and would be preferable to a long and convoluted ramp accessing the sunken ball court. Concept design 2 does not show any wheelchair accessible access to the sunken ball court area. Paths should be provided to access <u>all</u> park facilities such as play areas and equipment, sports areas and equipment, seating areas and viewing points. Concept design 2 does not show a barrier to the open edge of the new path next to the road, which would be required for safety reasons. This barrier would affect the view into the ball court area	✓	✓	✓	

CAE Comment	Protected characteristic impact:			
	Disability	Age	Pregnancy & Maternity	Sex
and have implications for the perception of safety for the hidden space.				
3.04 Surfaces				
<p>The surface of paths, seating areas, picnic areas, and specific play and sports areas should be firm, slip-resistant and reasonably smooth – grass, bare earth, sand, bark or un-bonded gravel should not be used.</p> <p>Surfaces both approaching and surrounding each specific area of the park need to be accessible for all, including disabled children and disabled adults, and should be firm and smooth as stated above.</p> <p>Although visual contrast can be useful to enable partially sighted people to perceive boundaries, bold surface patterns can be disorientating or misleading, and should be avoided. Colour, patterning, lettering and imagery used on pedestrian surfaces can be particularly problematic for people who are blind or partially sighted and people who have sensory/neurological processing difficulties.</p>	✓	✓	✓	
3.05 Play and Sports Areas				
<p>Play and sports areas proposed include either the existing sunken ball court or a new basketball half-court and a Panna football area. The play areas are as yet undetailed, however the public consultation expressed a preference for wooden equipment.</p>	✓	✓	✓	✓

CAE Comment	Protected characteristic impact:			
	Disability	Age	Pregnancy & Maternity	Sex
<p>Improvements to the play area were well supported. Comments about the play area included; 'children should be involved with the design of the play area', 'play area should use natural and sustainable materials' 'and 'play area is too shaded and needs more light'. These will be explored in the next stage of the design including involving children from Victory Primary school.</p> <p>It was agreed that the Play area would still need fencing, and previous comments regarding gate access would apply here.</p> <p>Responses indicated that a park which is accessible to all is very important, and that the best way to provide this is by filling in the ballcourt to raise it to ground level.</p> <p>CAE would support the statement by Southwark Council that it is not possible to provide ramped access due to the length of ramp required.</p> <p>All play and sports areas should be designed to be inclusive and accessible for both potential users and their companions or carers They should avoid segregation and separation, and should provide opportunities for children and adults with a variety of impairments.</p> <p>There should be clear and accessible routes and surfaces both to and through the play area, with the ability to get close to and interact with climbing units which might not themselves be accessible. There should be play facilities within easy reach for a range of users (seated, standing and different heights).</p>				

CAE Comment	Protected characteristic impact:			
	Disability	Age	Pregnancy & Maternity	Sex
<p>Play spaces should offer a good range of play opportunities for children with a diverse range of disabilities. Inclusive play spaces should facilitate children with and without disabilities to be in the same places and play together. There are examples of well-intentioned designs for inclusive play areas that are in fact inaccessible, so professional access advice is recommended, as well as consultation with children themselves.</p> <p>Example references - <i>Mainstreaming Inclusive Play. Good Practice Briefing 1: Inclusive Design for Play.</i> Play England and Kids charity / <i>London Plan SPG Shaping Neighbourhoods: Play and Informal Recreation</i></p> <p>The play areas should have accessible observation points, where parents, companions or carers can safely and comfortably sit and observe without necessarily being involved in the play or sports activities.</p> <p>There should be easy access to toilet facilities, and it is recommended that the park entrance signage, detailing WC facilities nearby, is repeated here.</p>				
3.06 Seating				
<p>As with play, sports and picnic areas there should be accessible paths leading to any seating and there should be accessible ground surface surrounding.</p>	✓	✓	✓	

CAE Comment	Protected characteristic impact:			
	Disability	Age	Pregnancy & Maternity	Sex
<p>Seating should be located so that it and its users do not reduce the access route width recommended when in use by a variety of people, including those with shopping or buggies and people using mobility aids or assistance dogs, and there should be space alongside to allow wheelchair users to be integrated within the general seating provision.</p> <p>Concept design 2 and 3 both appear to show seating (benches) on the grass next to the path, with no adjacent hard standing area.</p> <p>The public consultations raised improved and increased seating and picnic tables as a concern, and include the comment that Southwark Council should additionally ensure that there are comfortable benches away from picnic tables and the playground, particularly for older people and those who want to sit in a quieter spot.</p> <p>Public consultation also commented that the seating should be reviewed, as respondents mentioned that the stone seating blocks around the park were uncomfortable, especially in winter, and that more seating with armrests should be provided.</p> <p>Seating should visually contrast with the background against which it is seen and it should not have a highly reflective finish.</p> <p>A choice of seating options should ideally be available, with and without arm and back rests, and with different seat heights - 380mm, 480mm and 580mm from ground level. However, if only one type is provided the seat height should be between 450mm</p>				

CAE Comment	Protected characteristic impact:			
	Disability	Age	Pregnancy & Maternity	Sex
<p>and 480mm, and the seat should have both back support and arm rests.</p> <p>Arm rests are recommended for some of the seating, as they help people lower themselves onto the seat and stand up. Arm rests should be provided at a height of 200mm from the surface of the seat. There should be space between arm rests of at least 500mm.</p> <p>Back support should be provided at a height of at least 300mm from seat level.</p>				
3.07 Picnic area & picnic tables				
<p>See also above regarding seating in general.</p> <p>Concept design 1 & 2 both indicate standard A-frame picnic table provision.</p> <p>A variety of picnic tables should be provided with wheelchair-accessible provision offered. A standard A-frame picnic table is not accessible for wheelchair users and those with mobility disabilities.</p> <p>As with play areas, there should be an accessible path leading to the picnic area and the surrounding ground surface should be accessible, as detailed in 3.04 Surfaces.</p> <p>Picnic tables and benches should visually contrast with the background against which it is seen and it should not have a highly reflective finish.</p>	✓	✓	✓	

CAE Comment	Protected characteristic impact:			
	Disability	Age	Pregnancy & Maternity	Sex
3.08 Nature Area				
<p>Currently the nature area is only accessed via a separate entrance on Elba Place. This entrance is inaccessible (narrow pavement, lack of dropped kerb, gateway width).</p> <p>In public consultation, the idea of opening up the nature garden was popular, with many residents in favour of the opportunity to make more use of it, however there were also concerns that the area could become subject to anti-social behaviour if opened up and that increased use would be detrimental for the wildlife...</p> <p>A new entrance into the nature area to enable the space to be access from within the park itself would be supported, with all previous recommendations regarding gates, paths etc. applicable.</p>	✓			
3.09 Fences				
<p>Victory Community Park currently has high fencing that is in poor condition and would need to be replaced.</p> <p>Public consultation comments 'agree with lower/better fencing but state that it must be high enough to lock and keep people out', However, there are reports of people in the park at night, so the current fencing, although very high, does not prevent some people from getting in.</p>	✓	✓		✓

CAE Comment	Protected characteristic impact:			
	Disability	Age	Pregnancy & Maternity	Sex
<p>Some respondents disliked low fencing and stated that the park should have a high fence. The low fencing was included in all designs as a result of the first consultation, where 26% of people mentioned without prompting that they did not like the current high fencing... there was also a point of view that tall fencing was needed...</p> <p>In terms of accessibility the fencing impact is limited, however the open aspect for general views into and around the park would affect the safety and perception of safety of the area.</p>				
3.10 Lighting				
<p>The proposed design does not indicate any artificial lighting in the park, and Southwark Council policy is generally not to introduce new lighting due to the negative effect on wildlife, and the potential to increase antisocial behaviour by encouraging use of the park at night.</p> <p>Artificial lighting would be recommended however, to help maintain a level of illumination that is both comfortable for all park users, particularly those with visual impairments, neurodiversity and safety concerns. Good lighting, at dusk, night or gloomy days would provide physical and perceived safety to help facilitate surveillance, and discourage antisocial behaviour.</p> <p>CAE would agree with a public consultation comment that if the park was not locked at night, there should be lighting to be safe.</p>	✓	✓		✓

CAE Comment	Protected characteristic impact:			
	Disability	Age	Pregnancy & Maternity	Sex
Daylighting should be considered, along with any consideration of artificial lighting, to avoid excessive illuminance and glare on critical surfaces and elements. This should be achieved through avoidance of highly reflective surfaces and the use of natural shading.				
3.11 Bins, Planting and Miscellaneous				
<p>Bins should be positioned to be recognizable, convenient and usable, but they should not reduce the access route width.</p> <p>Waste bins should have a minimum height of 1000mm, with the opening 1000mm from ground level.</p> <p>Bins should be detectable at ground level, incorporating a consistent profile throughout their height from ground level, or a form of ground level detection, plinth or tapping rail should be provided to assist people who are blind or partially sighted in detecting the bin.</p>	✓	✓		
<p>General planting, foliage and soft landscaping features should not be located within a clear pedestrian route or desire line. Roots and branches should also not provide an obstruction.</p> <p>Climbing plants along fences need to be regularly maintained, so that they do not create an obstruction at any height up to 2.5m.</p> <p>Surface or ground-mounted tree pits should provide a smooth transition and accessible surface from the surrounding ground</p>	✓	✓	✓	✓

CAE Comment	Protected characteristic impact:			
	Disability	Age	Pregnancy & Maternity	Sex
<p>level/finish, and any joints between ground surfaces should be smooth and level.</p> <p>Raised planters can help contribute to an interesting landscape with a variety of accessible levels. They should be at least 150 mm high from ground level and must be maintained to prevent over-hanging onto paths. Raised planters should contrast visually with the surrounding surface finishes to ensure that they are recognizable. Raised planters need to be maintained to ensure that any plants within the planter do not intrude over pedestrian routes and create a trip hazard.</p> <p>Care should be taken to ensure that trees and large shrubs do not affect the functionality of lighting, both natural and artificial, as this would affect the usability of the space by many people. It can also have an impact on safety or the perception of safety within the park.</p> <p>A sensory aspect to the planting can provide a valuable resource for a wide range of uses and can provide orientation and interest.</p> <p>Grassed and soft landscaped areas should be regularly maintained so that they remain attractive and usable: overgrown areas can feel unsafe and are more likely to be subject to anti-social behaviour and vandalism.</p>				
<p>General signage should follow the same guidance given at item 3.01 regarding the park entrance signage.</p>	✓	✓		

CAE Comment	Protected characteristic impact:			
	Disability	Age	Pregnancy & Maternity	Sex
A notice board or case should have information displayed within a height band of 1100-1600mm AFL, with items repeated at both the upper and lower height. The notice board should be located on a firm surface to enable approach by a wheelchair user, but off the main access route to avoid obstruction.				
Note that bollards generally should not be located within an access route, as they are particularly hazardous to people who are blind or partially sighted. If bollards are used to create protective distance, the effective clear width between the physical features should be not less than 1200mm. They should be at least 1000mm high and should contrast visually with the background against which they are seen. They should not have a highly reflective finish and it is recommended that they have a 150mm deep contrasting strip at the top.	✓	✓		

4. SCOPE

This report is based on information and access provided to the consultant at the time of audit. Any recommendations are based upon evidence seen. While every care is taken to interpret current Acts, Regulations and Approved Codes of Practice, these can only be authoritatively interpreted by Courts of Law.

Any notes written by the Access Consultant on the drawings or extracts from them associated with this review do not constitute a design or specification and are purely observations which may be used at the Designer’s discretion to develop into a working design. Any CDM implications that arise from the final design should be considered by the

Designer under the Construction (Design and Management) Regulations 2015 and associated regulations.

Undertaking the recommendations in the report may assist with meeting obligations under the Equality Act 2010 but does not guarantee this, as further adjustments may be needed as and when an individual's particular disability requires. The Act does not contain prescriptive standards to improve accessibility or inclusion. As such, compliance with the Act cannot ultimately be determined. Only tangible standards set out in guidance documents such as BS8300: 2018 can be referred to for compliance. Although the built environment may meet Approved Document M or BS8300 in some areas, further reasonable adjustments under the Act may be needed to suit the requirements of individual disabled users.

5. REFERENCES

The Equality Act 2010

British Standard BS8300-1:2018 Design of an accessible and inclusive built environment – part 1: External Environments

Designing for Accessibility – Centre for Accessible Environments (CAE)

Inclusive Urban Design – Bsi; CAE; David Bonnett Associates

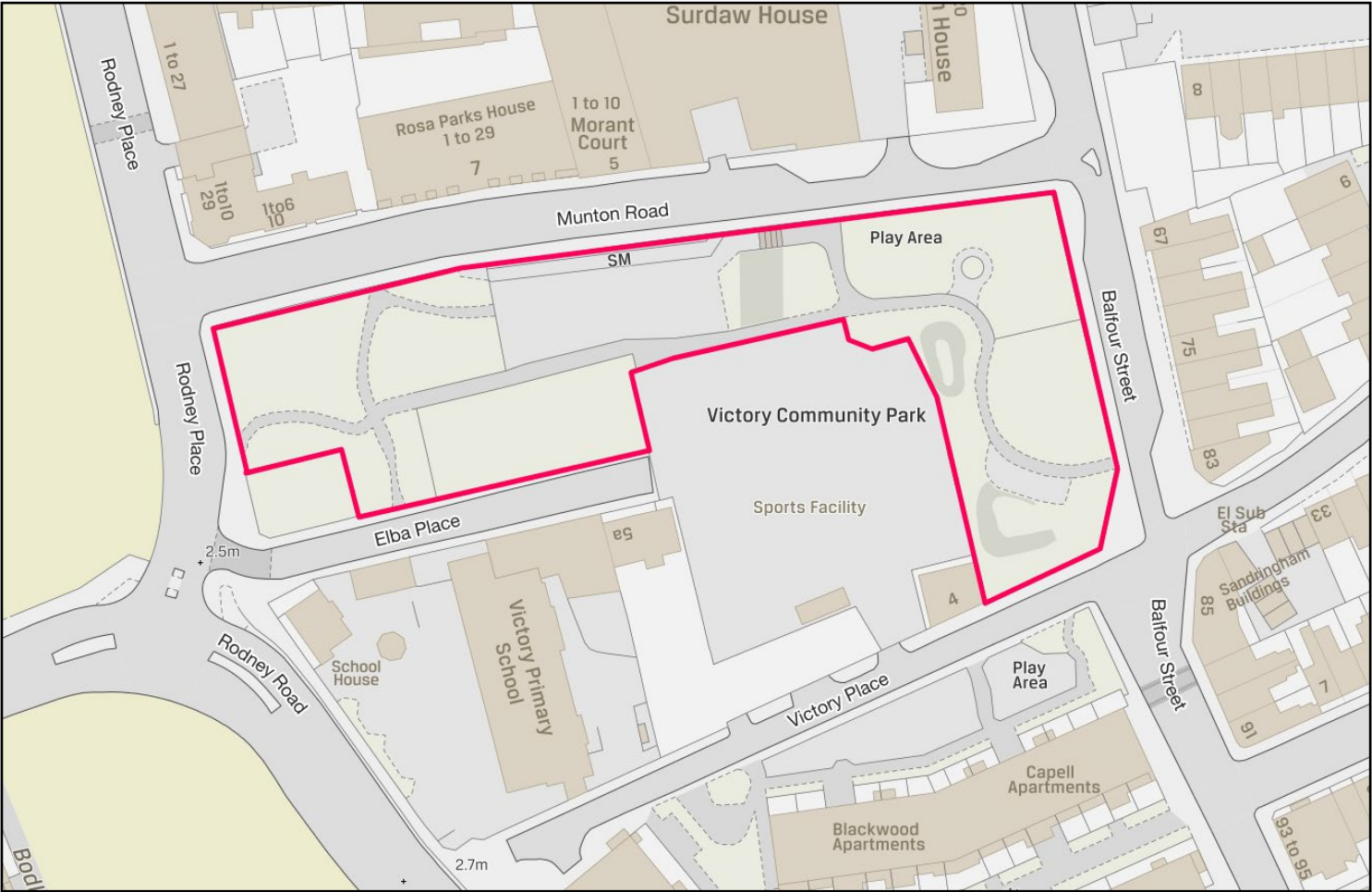
Sign Design Guide – JMU; Sign Design Society

6. APPENDICES

A copy of CAE's standard appendices are attached for general guidance.

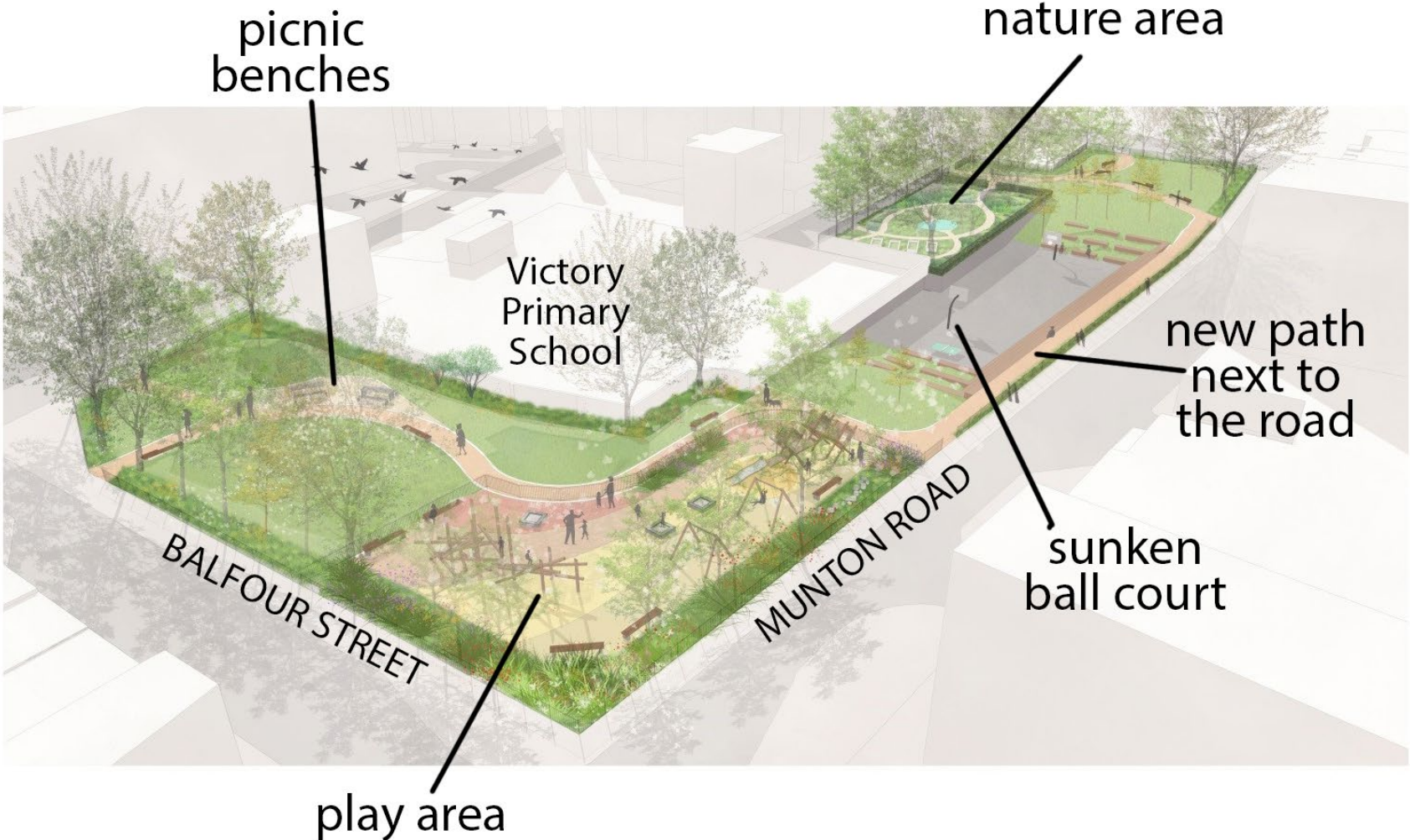
All advice is given in good faith and based upon information and knowledge available at the time of the review. CAE does not accept any responsibility for any loss occasioned by reason of non-compliance with legislation, including the Equality Act 2010 and any subsequent amendments.

Site Location Plan

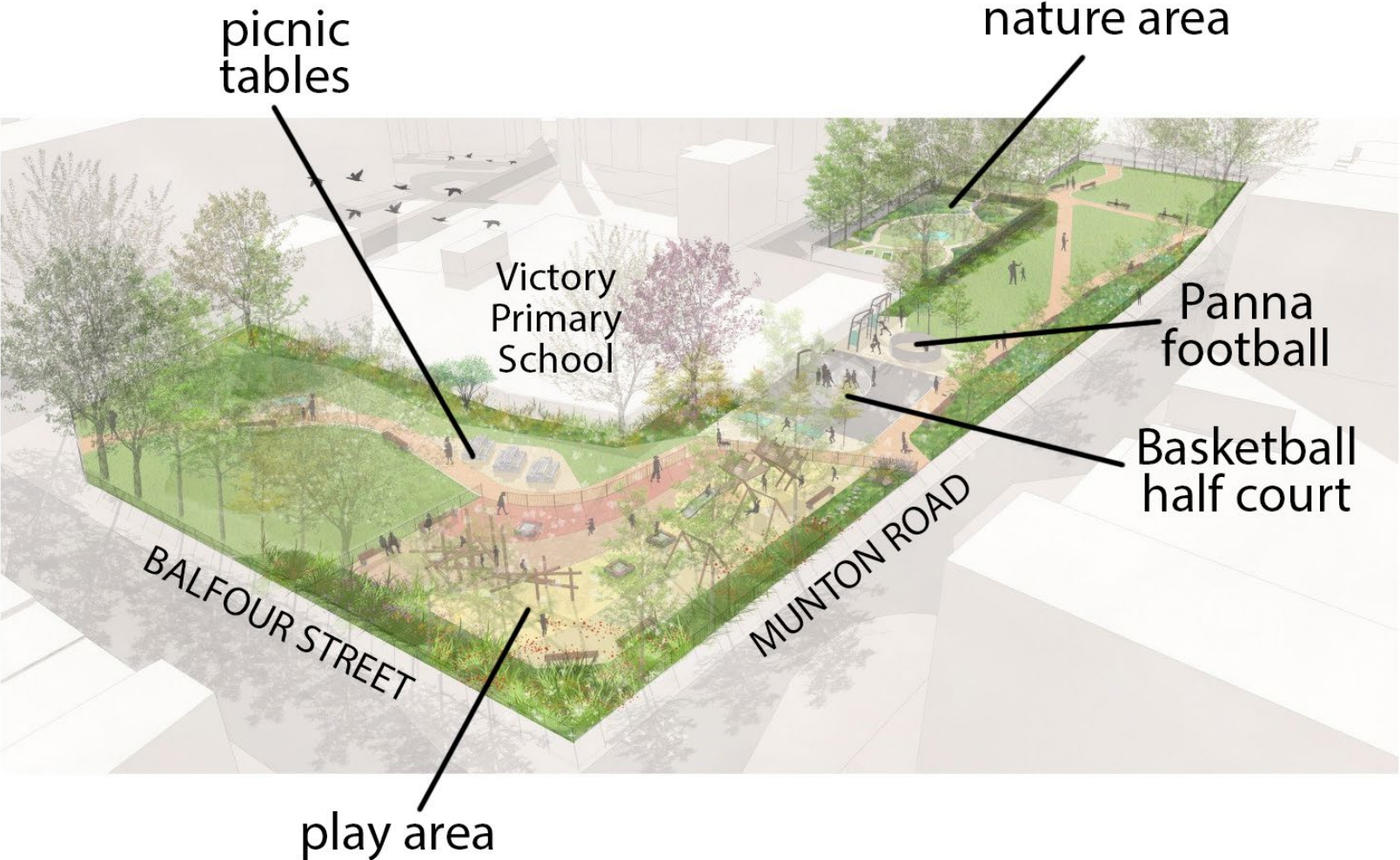


65

Concept design 2



Concept design 3



Item No. 7.	Classification: Open	Date: 7 November 2023	Meeting Name: Planning Committee (Major Applications) B
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 committees. The matters reserved to the planning committees exercising planning functions are described in part 3F of the Southwark Council constitution.

KEY ISSUES FOR CONSIDERATION

5. In respect of the attached planning committee items members are asked, where appropriate:
 - a. To determine those applications in respect of site(s) within the borough, subject where applicable, to the consent of the Secretary of State for Levelling Up, Housing and Communities and any directions made by the Mayor of London.
 - b. To give observations on applications in respect of which the council is not the planning authority in planning matters but which relate to site(s) within

the borough, or where the site(s) is outside the borough but may affect the amenity of residents within the borough.

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

Community impact statement

11. Community impact considerations are contained within each item.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Assistant Chief Executive – Governance and Assurance

12. A resolution to grant planning permission shall mean that the director of planning and growth is authorised to grant planning permission. The resolution does not itself constitute the permission and only the formal document authorised by the committee and issued under the signature of the director of planning and growth shall constitute a planning permission. Any additional conditions required by the committee will be recorded in the minutes and the final planning permission issued will reflect the requirements of the planning committee.
13. A resolution to grant planning permission subject to legal agreement shall mean that the director of planning and growth is authorised to issue a planning

permission subject to the applicant and any other necessary party entering into a written agreement in a form of words prepared by the assistant chief executive – governance and assurance, and which is satisfactory to the director of planning and growth. Developers meet the council's legal costs of such agreements. Such an agreement shall be entered into under section 106 of the Town and Country Planning Act 1990 or under another appropriate enactment as shall be determined by the assistant chief executive – governance and assurance. The planning permission will not be issued unless such an agreement is completed.

14. Section 70 of the Town and Country Planning Act 1990 as amended requires the council to have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations when dealing with applications for planning permission.
15. Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The development plan is currently the Southwark Plan which was adopted by the council in February 2022. The Southwark Plan 2022 was adopted after the London Plan in 2021. For the purpose of decision-making, the policies of the London Plan 2021 should not be considered out of date simply because they were adopted before the Southwark Plan 2022. London Plan policies should be given weight according to the degree of consistency with the Southwark Plan 2022.
16. The National Planning Policy Framework (NPPF), as amended in July 2021, is a relevant material consideration and should be taken into account in any decision-making.
17. Section 143 of the Localism Act 2011 provides that local finance considerations (such as government grants and other financial assistance such as New Homes Bonus) and monies received through CIL (including the Mayoral CIL) are a material consideration to be taken into account in the determination of planning applications in England. However, the weight to be attached to such matters remains a matter for the decision-maker.
18. "Regulation 122 of the Community Infrastructure Levy regulations (CIL) 2010 as amended, provides that "a planning obligation may only constitute a reason for granting planning permission if the obligation is:
 - a. necessary to make the development acceptable in planning terms;
 - b. directly related to the development; and
 - c. fairly and reasonably related to the scale and kind to the development.

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

19. The obligation must also be such as a reasonable planning authority, duly appreciating its statutory duties can properly impose i.e. it must not be so unreasonable that no reasonable authority could have imposed it. Before resolving to grant planning permission subject to a legal agreement members should therefore satisfy themselves that the subject matter of the proposed agreement will meet these tests.

BACKGROUND DOCUMENTS

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

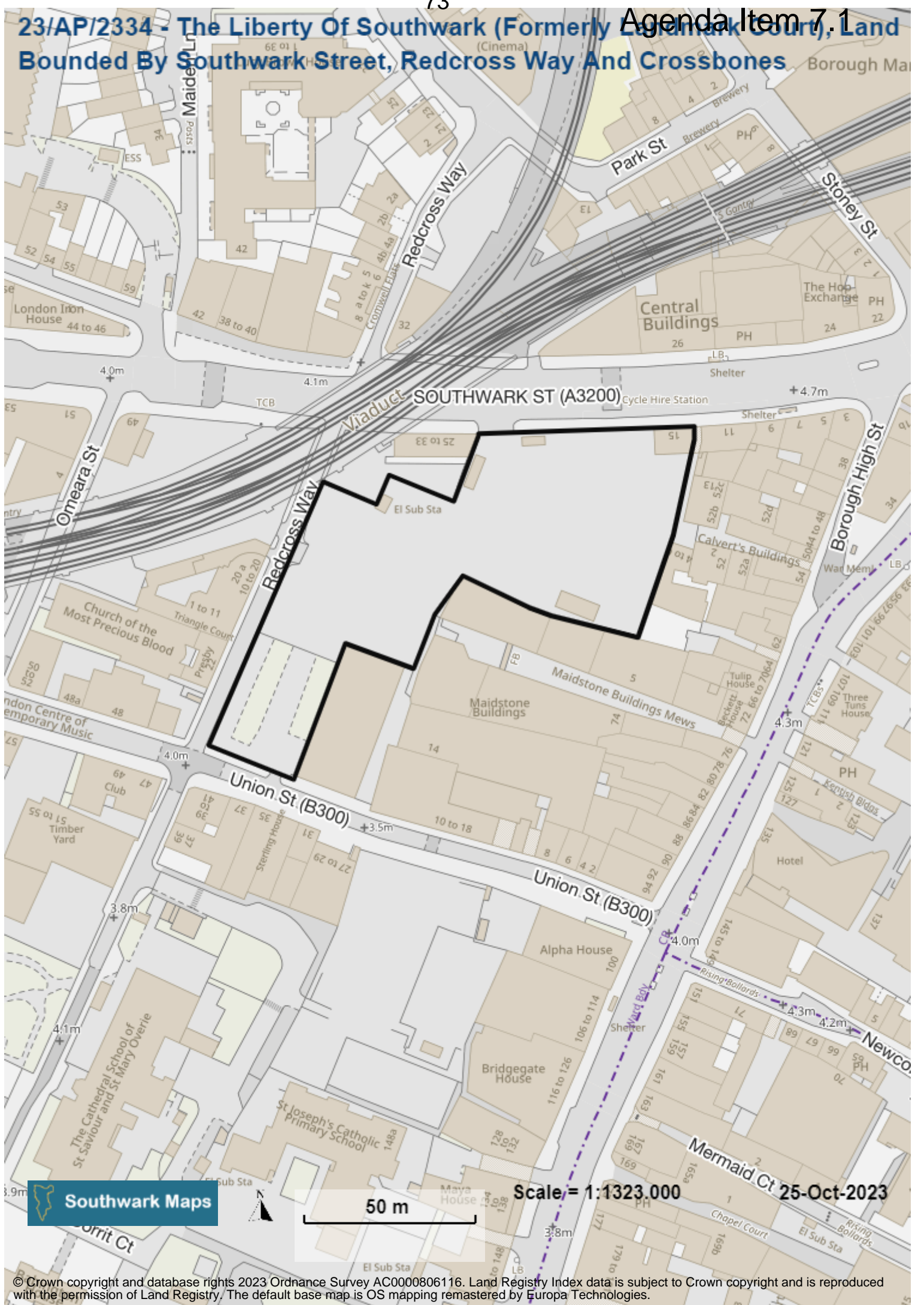
APPENDICES

No.	Title
None	

AUDIT TRAIL

Lead Officer	Chidilim Agada, Head of Constitutional Services	
Report Author	Gerald Gohler, Constitutional Officer Nagla Stevens, Deputy Head of Law (Planning and Development)	
Version	Final	
Dated	10 October 2023	
Key Decision?	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments sought	Comments included
Assistant Chief Executive – Governance and Assurance	Yes	Yes
Director of Planning and Growth	No	No
Cabinet Member	No	No
Date final report sent to Constitutional Team	30 October 2023	

23/AP/2334 - The Liberty Of Southwark (Formerly Lambmark Court), Land Bounded By Southwark Street, Redcross Way And Crossbones



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Item No. 7.1	Classification: Open	Date: 7 November 2023	Meeting Name: Planning Committee (Major Applications) B
Report title:	<p>Development Management planning application: Application 23/AP/2334 for: Non-material amendment</p> <p>Address: The Liberty Of Southwark (Formerly Landmark Court), Land Bounded By Southwark Street, Redcross Way And Crossbones Graveyard, London, SE1</p> <p>Proposal: Non material amendment of planning permission 19/AP/0830: 'Mixed-use development involving the demolition of 25-33 Southwark Street, the restoration of 15 Southwark Street for residential use and the erection of new buildings comprising: a part 6/8/9-storey office (Class B1) building incorporating a single-storey basement, flexible ground floor uses (Classes A1/A2/A3/A4 and D2) and workspace units (Class B1); a 3-storey workshop building (Class B1); a marketplace with up to 9 permanent stalls (Class A1); 36 residential units in the refurbished 15 Southwark Street building and a new 8-storey block; associated areas of new public realm; hard and soft landscaping; enhancements to Crossbones Burial Ground; means of access and enclosure, and; ancillary plant and equipment.'</p> <p>Non-Material Amendment to enable the dismantlement, storage, and restoration of the facade of 15 Southwark Street and the amendment of the wording of Condition 25.</p>		
Ward(s) or groups affected:	Borough and Bankside		
From:	Director of Planning and Growth		
Application Start Date	30/08/2023	PPA Expiry Date	N/A
Earliest Decision Date	26/09/2023		

RECOMMENDATION

1. That the application for non-material changes be agreed.

BACKGROUND INFORMATION

Parent planning application

2. The detailed background information relating to this development and the application site is set out in the report on the original planning permission ref: 19/AP/0830 dated 05.01.2021 (and the reports of permissions ref: 21/AP/1295

and 22/AP/1689 – non-material amendments to the original permission) for:

“Mixed-use development involving the demolition of 25-33 Southwark Street, the restoration of 15 Southwark Street for residential use and the erection of new buildings comprising: a part 6/8/9-storey office (Class B1) building incorporating a single-storey basement, flexible ground floor uses (Classes A1/A2/A3/A4 and D2) and workspace units (Class B1); a 3-storey workshop building (Class B1); a marketplace with up to 9 permanent stalls (Class A1); 36 residential units in the refurbished 15 Southwark Street building and a new 8-storey block; associated areas of new public realm; hard and soft landscaping; enhancements to Crossbones Burial Ground; means of access and enclosure, and; ancillary plant and equipment.”

Details of the proposed non-material changes

3. The changes sought by this application to the original planning application are as follows:
 - Non-Material Amendment to enable the dismantlement, storage, and restoration of the facade of 15 Southwark Street and then reconstruction (as opposed to repairing in situ).
 - The amendment of the wording of Condition 25 (façade repair specification) to the following:

“Notwithstanding the repair and restoration details as approved under discharge of condition reference 22/AP/2038, prior to commencement of above ground works to Block 01: The Southwark Street Office Cluster, an updated specification for the restoration of the front elevation of 15 Southwark Street shall be submitted to and approved by the Local Planning Authority. The development shall not be carried out other than in accordance with any such approval given, and the restoration of 15 Southwark Street shall be completed prior to occupation of Block 01: The Southwark Street Office Cluster.

Reason: In order that the Local Planning Authority may be satisfied that the construction details to be used in the construction of the development achieve a quality of design and detailing, are suitable in context and consistent with the consented scheme, in accordance with: Chapter 12 of the National Planning Policy Framework 2019; Strategic Policy 12 (Design and Conservation) of the Core Strategy 2011, and; Saved Policies 3.12 (Quality in Design) and 3.13 (Urban Design) of the Southwark Plan 2007.”

Planning history

4. See Appendix 3 for any relevant planning history of the application site and/or adjoining sites.

Preliminary matters

Planning policy

5. This application is to be determined on matters of fact and degree and planning law in respect of the extent and effect of the proposed change to the permitted development. Matters of planning policy are not a relevant consideration.
6. The detailed planning policy relating to this development is set out in the report on the original planning application.

KEY ISSUES FOR CONSIDERATION

7. The main issue in respect of this application is to determine if the proposed changes are:
 - (a) non-material and do not require the submission of an application for planning permission by reason that they:
 - (i) do not in themselves constitute development, or
 - (ii) are considered to be so trivial or inconsequential that they may be regarded as *de minimis*, that is legally of no consequence, and that planning permission is not required;

or

 - (b) are materially different from the permitted development and require the submission of an application for planning permission.
8. This is discussed in detail in the 'Assessment' section of this report.
9. Community impact, equalities and human rights implications are relevant considerations, as is working proactively and positively with applicants and agents. These matters are discussed in the 'Assessment' section of this report.

Community involvement and engagement

10. There is no statutory requirement for consultation for a non-material amendment, however, the following comments have been taken into consideration when assessing the application.

Consultation responses from external and statutory consultees

11. **Historic England (HE):** Proposal would result in less than substantial harm. LPA should consider whether this harm is outweighed by public benefits. As much significant fabric must be retained as possible. If LPA is minded to approve, it is recommended that redevelopment of 15 Southwark Street is prioritised in terms of the phasing plan for the wider development (to help ensure historic fabric is reinstated).
12. **Greater London Authority (GLA):** The GLA offered the following comments in their pre-application report (regarding the subject amendment to 15 Southwark Street):

“GLA officers have had further discussions with the LPA and the applicant in relation to the condition of the façade and the proposals; and have also inspected the façade themselves on site. It is accepted that the façade is in very poor condition, with serious structural issues. The approach proposed is a practical way forward in current circumstances and it is noted that the LPA is in support of this aspect of the proposals. The dismantling and re-erection of the façade will cause a low degree of less than substantial harm to the conservation area, since it is unknown how much of the original material will be able to be salvaged and reused. There will therefore be some loss of authenticity; however, the harm is justified. It is understood from the applicant that advice from suitable experts has been received and that the re-erection of the façade will be supervised by a well-regarded firm of conservation experts, which is welcome.”

13. **Victorian Society:** Façade should be restored in situ. If this is not possible then strict conditions must be applied that will ensure the reconstruction of the elevation as accurately as possible with minimal loss of historic fabric. Suggestion of deliberate neglect.
14. **Council for British Archaeology (CBA):** Façade should be repaired in situ. If this is not possible then strict conditions must be applied that will ensure the reconstruction of the elevation as accurately as possible with minimal loss of historic fabric. Suggestion of deliberate neglect.

Consultation responses from members of the public and local groups

15. Public comments - 15 objections were received raising the following concerns:
 1. Concern façade will be permanently removed (façade should be restored in situ)
 2. Damage has been caused by applicant (deliberate neglect)
 3. Harm to character and appearance of the façade (and wider conservation area)
 4. Lack of consultation

ASSESSMENT

Condition of 15 Southwark Street

16. The non-material amendment application (NMA) for the façade of 15 Southwark Street (reference - 23/AP/2334) was submitted in September 2023, as it was deemed the stabilisation works that are currently underway to the building structure are no longer considered to be safe.
17. 15 Southwark Street (15SS) was last occupied in 1972 when Wigan Richardson & Co moved to new modern premises on Borough High Street. The building has never been occupied since. 15 Southwark Street and the

adjacent hop warehouse were left empty during the remainder of the 1970's and 1980's. During that time the building suffered fire damage which materially affected the timber joisting in the floors and roof.

18. The site was identified as a construction yard for the Jubilee Line Extension and was confirmed as a strategic site, being set aside in the Jubilee Line Act 1990. This is the point at which the building formally goes into the ownership of London Underground Limited.
19. The current condition of the 15SS façade is due to the fact that once the Jubilee line construction was completed, the building was offered basic protection from the elements and left unattended for a further 35 or so years. The temporary roof did not cover the top coping stone, allowing several decades of water to penetrate the masonry, causing extensive degradation.
20. The recent demolition work has allowed an inspection of the rear face of the front facade wall of 15SS for the first time (which previously was not possible). This has revealed many structural defects within the facade wall.
21. The façade of the building remains standing only due to the previous scaffold system and current structural scaffold. Previous neglect (over a number of decades, well before the current applicant was involved) and subsequent loss of the original roof some half century ago has resulted in the issues seen today.



Image showing rear face with decaying brickwork, rotting timber and corroded metalwork.

22. Extensive survey work and review of the strategy for the restoration of 15SS was commissioned by the Applicant, and reports by Arnold Burgess

Partnership, Harrison Goldman and Robert Bird Group, suitably qualified experts, have been prepared. The referenced reports have been submitted with the subject application to ensure a transparent process. These all identify that in situ restoration is no longer possible and deconstruction is necessary for the following reasons:

- The façade is severely cracked, and the majority of the structural nodes are compromised. This means that the application of additional supports would be more intrusive to the historic fabric than deconstructing and reconstructing.
- The bond between the inner brick skin and the facing brick cannot be assessed fully and is known to be broken. This would prevent any in-situ restoration from being compliant with Building Regulations.
- The compressive strength of the historic fabric has been assessed as around half of what it needs to be, due to prolonged exposure to freeze/thaw action. As such, the retained material needs to be tested and re-conditioned before an appropriate design for its structural support can be implemented.
- There is a further defect at first floor which need to be addressed; the support beams are rusted through, and the stone has fallen away. These beams can only be repaired with the load taken off of them i.e., that the masonry above needs to be removed, which can only be achieved through deconstruction.

23. The applicant has engaged with the LPA extensively at pre-application stage, with both officers and Councillors having visited the site to assess the condition of the façade. It was evident that the façade is in a poor state of repair and the elements described in the reports were plainly visible.



Image showing the poor quality brickwork behind the outer skin of stone.



Cracking through all major stone pieces at a structural node in the façade.

Policy context

24. The site is in the Borough High Street conservation area as a building of importance and is considered to be an undesignated heritage asset within the designated asset of the conservation area. The significance of the building is a good and detailed example of hop exchange and sales offices with warehouse above and behind, albeit in a dilapidated state and without the majority of the building (the roof and the areas behind the façade having been lost).
25. The NPPF para 207 states that loss of a building which makes a positive contribution to a conservation area should be treated at substantial harm or less than substantial. The NPPF also requires the LPA to place great weight (para 199) on the conservation of the asset, and also requires less than substantial harm to be outweighed by public benefit. Para 196 requires no emphasis to be put on the assets condition if the erosion or neglect of the asset is deliberate (this is not applicable in this instance). The Southwark Plan 2022 policy P20 requires conservation areas to be preserved and enhanced.

Impact on 15 Southwark Street

26. The loss of the building would cause substantial harm to the undesignated heritage asset (the building itself) while the loss of the building within the conservation area would cause less than substantial harm.
27. The 15SS façade would be dismantled, with the fabric remaining on-site ready for reconstruction. The removal of the NDHA will be harmful to its heritage significance, although this condition is temporary. It is important to consider the façade retention works as a whole, including both deconstruction and reconstruction, with the end objective to reinstate the frontage in a cleaned and restored state. The works as a whole give the building a new and appropriate use, whilst securing its long-term conservation. The design solutions sought are specific to the Site's historic context, and take into account the role of the building both within the immediate townscape but its historic function as a hop warehouse. Taken as a whole, whilst the proposals do include some impacts that will adversely impact the building, those are outweighed by the positive aspects.
28. 15SS has been left unused since 1972. The proposed restoration works (which can only be achieved via deconstruction) allows the building to be brought back into use, a building which is a positive contributor to the Borough High Street Conservation Area. The restoration works would result in a positive impact to both 15SS' character and appearance as well as the wider conservation areas'. The building would positively contribute through the strong horizontal proportions, which are maintained through the improvements to the signage and the fenestration of 15SS.
29. If the subject application were to be approved, the applicant would have to reconstruct the façade (as approved). Any deviation from the approved drawings and supporting documents would be a breach of planning control and would result in enforcement action.

30. The subject non-material amendment application is strictly to allow the careful deconstruction and restoration of the 15SS façade (as opposed to restoring in situ). All other proposals (such as a change of use or design alterations) are to be assessed and determined under a separate application (ref. 23/AP/2810).
31. A non-material amendment is considered to be the appropriate mechanism to facilitate the proposed changes (including the re-wording of condition 25). There is no statutory requirement to consult on a non-material amendment application. The proposal is considered to be acceptable and to be non-material when considered in the context of the wider development, i.e. the delivery of approximately 21.4k sqm of employment space (including affordable workspace), 36 residential units (including affordable housing), public realm improvements, and all associated public benefits of the wider scheme etc. It should not be considered in isolation (15SS façade alone).

Community impact and equalities assessment

32. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights.
33. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
34. 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, and;
 - 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.

35. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.
36. In the view of officers, this NMA, does not impinge on any groups with protected characteristics.

Human Rights Implications

37. 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.
38. This application has the legitimate aim of providing the details required by a grant of planning permission. 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

39. The council has published its development plan on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
40. 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.

41. 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?	Further information was submitted by applicant
To help secure a timely decision, did the case officer submit their recommendation in advance of the statutory determination date?	No - called in to planning committee

Conclusion on the materiality of the changes

42. As explained in detail in the 'Assessment' part of this report, the proposed changes are considered to be 'non-material'. Accordingly, it is recommended that the application be granted.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP 1145-15 Application file: 23/AP/2334 Southwark Local Development Framework and Development Plan Documents	Environment, Neighbourhoods & Growth Department 160 Tooley Street London SE1 2QH	Planning enquiries: 020 7525 0254 planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 0254 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Recommendation (draft decision notice)
Appendix 2	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	Steve Platts, Director of Planning and Growth	
Report Author	Nathaniel Young, Strategic Team Leader	
Version	Final	
Dated	25 October 2023	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance	No	No
Strategic Director of Environment, Neighbourhoods and Growth	No	No
Strategic Director of Housing	No	No
Date final report sent to Constitutional Team		25 October 2023

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	C/O Agent Landmark Court Partnership Ltd	Reg. Number	23/AP/2334
Application Type	Variation: Non-Material Changes		
Recommendation	Agreed	Case Number	1145-15

Draft of Decision Notice

The Non-material amendment is **AGREED** for the following development:

Non material amendment of planning permission 19/AP/0830: 'Mixed-use development involving the demolition of 25-33 Southwark Street, the restoration of 15 Southwark Street for residential use and the erection of new buildings comprising: a part 6/8/9-storey office (Class B1) building incorporating a single-storey basement, flexible ground floor uses (Classes A1/A2/A3/A4 and D2) and workspace units (Class B1); a 3-storey workshop building (Class B1); a marketplace with up to 9 permanent stalls (Class A1); 36 residential units in the refurbished 15 Southwark Street building and a new 8-storey block; associated areas of new public realm; hard and soft landscaping; enhancements to Crossbones Burial Ground; means of access and enclosure, and; ancillary plant and equipment.'

Non-Material Amendment to enable the dismantlement, storage, and restoration of the facade of 15 Southwark Street and the amendment of the wording of Condition 25.

At

The Liberty Of Southwark (formerly Landmark Court) Land Bounded By Southwark Street Redcross Way And Cross Bones Graveyard London SE1

In accordance with the valid application received on 30 August 2023 and supporting documents submitted which can be viewed on our Planning Register.

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

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

Conditions

Permission is subject to the following Approved Plans Condition:

The development shall be carried out in accordance with the following approved plans: (drawing numbers to be added)

Reference no./Plan or document name/Rev.

Received on:

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

Permission is subject to the following Compliance Condition(s)

1. (REPLACEMENT OF CONDITION 25):

SPECIFICATION FOR THE REPAIR AND RESTORATION OF THE FRONT ELEVATION OF 15 SOUTHWARK STREET

BLOCK 02(B): 15 SOUTHWARK STREET

Notwithstanding the repair and restoration details as approved under discharge of condition reference 22/AP/2038, prior to commencement of above ground works to Block 01: The Southwark Street Office Cluster, an updated specification for the restoration of the front elevation of 15 Southwark Street shall be submitted to and approved by the Local Planning Authority. The development shall not be carried out other than in accordance with any such approval given, and the restoration of 15 Southwark Street shall be completed prior to occupation of Block 01: The Southwark Street Office Cluster.

Reason: In order that the Local Planning Authority may be satisfied that the construction details to be used in the construction of the development achieve a quality of design and detailing, are suitable in context and consistent with the consented scheme in accordance with Chapter 16 (Conserving and enhancing the historic environment) of the National Planning Policy Framework (2021); Policy HC1 (Heritage conservation and growth) of the London Plan (2021); Policy P19 Listed buildings, Policy P20 (Conservation areas) and Policy P21 (Conservation of the historic environment and natural heritage) of the Southwark Plan (2022).

2. Prior to commencement of above-grade works (excluding cores), a valid construction contract (under which one of the parties is obliged to carry out and complete the works of redevelopment of the site for which planning permission was granted simultaneously with this consent) shall be entered into and evidence of the construction contract shall be submitted to for approval in writing by the Local Planning Authority.

Reason: As empowered by Section 74(3) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and to maintain the character and appearance of the Conservation Area, in accordance with Chapter 16 (Conserving and enhancing the historic environment) of the National Planning Policy Framework (2021); Policy HC1 (Heritage conservation and growth) of the London Plan (2021); P19 Listed buildings, Policy P20 (Conservation areas), and Policy P21 (Conservation of the historic environment and natural heritage) of the Southwark Plan (2022).

3. Prior to above grade works commencing (excluding deconstruction works), material samples of all external facing materials to be used in the carrying out of the restoration/rebuilding of 15 Southwark Street shall be presented on site and approved in writing by the Local Planning Authority; the development shall not be carried out otherwise than in accordance with any such approval given.

Reason: In order to ensure that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing in accordance with Chapter 12 (Achieving well-designed places) of the National Planning Policy Framework (2023); Policy D4 (Delivering good design) of the London Plan (2021); Policy P13 (Design of Places) and Policy P14 (Design Quality) of the Southwark Plan (2022).

Important Notes Relating to the Council's Decision

1. Conditions

- If permission has been granted you will see that it may be subject to a number of planning conditions. They are an integral part of our decision on your application and are important because they describe how we require you to carry out the approved work or operate the premises. It is YOUR responsibility to comply fully with them. Please pay particular attention to those conditions which have to be met before work commences, such as obtaining approval for the siting and levels of buildings and the protection of trees on the site. If you do not comply with all the conditions in full this may invalidate the permission.
- Further information about how to comply with planning conditions can be found at:
https://www.planningportal.co.uk/info/200126/applications/60/consent_types/12
- Please note that there is a right of appeal against a planning condition. Further information can be found at:
https://www.planningportal.co.uk/info/200207/appeals/108/types_of_appeal

2. Community Infrastructure Levy (CIL) Information

- If your development has been identified as being liable for CIL you need to email [Form 1: CIL Additional Information](#), [Form 2: Assumption of Liability](#) and [Form 6: Commencement Notice](#) to cil.s106@southwark.gov.uk as soon as possible, so that you can be issued with a Liability Notice. This should be done at least a day before commencement of the approved development.
- **Payment of the CIL charge is mandatory and the CIL Regulations comprises a range of enforcement powers and penalties for failure to following correct procedures to pay, including stop notices, surcharges, late payment interests and prison terms.**
- To identify whether your development is CIL liable, and further details about CIL including eligibility and procedures for any CIL relief claims, please see the Government's CIL guidance:
<https://www.gov.uk/guidance/community-infrastructure-levy>
- All CIL Forms are available to download from Planning Portal:
https://www.planningportal.co.uk/info/200136/policy_and_legislation/70/community_infrastructure_levy/5
- Completed forms and any CIL enquiries should be submitted to cil.s106@southwark.gov.uk

3. National Planning Policy Framework

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

4. Appeals to the Secretary of State

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

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

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

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

5. Purchase Notice

- If either the local planning authority or the Secretary of State grants permission subject to conditions, the owner may claim that the land can neither be put to a reasonably beneficial use in its existing state nor made capable of reasonably beneficial use by the carrying out of any development which has been or would be permitted. In these circumstances the owner may serve a purchase notice on the Council requiring the Council to purchase the owner's interest in the land in accordance with Part VI of the

Town and Country Planning Act 1990

6. Provisions for the Benefit of the Disabled

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

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

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

8. Works Affecting the Public Highway

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

9. The Dulwich Estate Scheme of Management

- Development of sites within the area covered by the Scheme of Management may also require the permission of the Dulwich Estate. If your property is in the Dulwich area with a post code of SE19, 21, 22, 24 or 26 you are advised to consult the Estates Governors', The Old College, Gallery Road SE21 7AE [tel: 020-8299-1000].

10. Building Regulations.

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

11. The Party Wall Etc. Act 1996.

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

12. Important

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

Relevant planning policy

NPPF Chapters 12. Achieving well-designed places & 16 Conserving and enhancing the historic environment

London Plan 2021: D1 Design, character and capacity for growth; D3 Optimising site capacity; D4 Delivering good design; D5 Inclusive design; HC1 Heritage conservation and growth

Southwark Plan 2022; P13 Design of places; P14 Design quality; P19 Listed buildings, P20 Conservation areas, Policy P21 (Conservation of the historic environment and natural heritage)

Heritage SPD 2021

Other guidance: “The setting of Heritage Assets” (Historic England); Borough High Street conservation area appraisal

APPENDIX 3**PLANNING HISTORY OF THE SITE AND NEARBY SITES**

19/AP/0830 – Parent application - Mixed-use development involving the demolition of 25-33 Southwark Street, the restoration of 15 Southwark Street for residential use and the erection of new buildings comprising: a part 6/8/9-storey office (Class B1) building incorporating a single-storey basement, flexible ground floor uses (Classes A1/A2/A3/A4 and D2) and workspace units (Class B1); a 3-storey workshop building (Class B1); a marketplace with up to 9 permanent stalls (Class A1); 36 residential units in the refurbished 15 Southwark Street building and a new 8-storey block; associated areas of new public realm; hard and soft landscaping; enhancements to Crossbones Burial Ground; means of access and enclosure, and; ancillary plant and equipment. Granted 05.01.2021.

21/AP/1295 – NMA: The amendments relate to the creation of a two-part CIL phasing plan. Agreed 14.05.2021.

22/AP/1689 – NMA: The amendment relates to stabilisation works and reconfiguration of the layout of no.15 Southwark Street, and consequent minor changes to conditions to facilitate scheme phasing. Agreed 03.08.2022.

23/AP/0230 – NMA: The amendment relates to the further amendment of the CIL phasing plan. Agreed 16.02.2023.

23/AP/2643 – NMA: The amendment relates to the further amendment of the CIL phasing plan. Agreed 20.10.2023.

APPENDIX 4

Consultation undertaken**Site notice date:** n/a.**Press notice date:** n/a.**Case officer site visit date:** n/a**Neighbour consultation letters sent:** 31/08/2023**Internal services consulted**

Design and Conservation Team [Formal]

Statutory and non-statutory organisations**Neighbour and local groups consulted:**13 Serpentine Court Bletchley Milton
Keynes

11 Edithna Street London SW9 9JR

4 Bull Mill Warminster BA12 8AY

4W Rosebery Square West Rosebery
Avenue London

46 Manor Park Rd East Finchley London

69 Kemps Lane Beccles

22 Trinity Church Square London SE1
4HY

Flat 5 41 Glengall Road London

50 Northfleet House London SE1 1YX

Flat 2 26 Marshalsea Road London

25 Vista Way Harrow HA3 0SP

85E Balfour Street London SE17 1PB

Flat 6, Triangle Court Redcross Way
London

1 Poultry London EC2R 8EJ

17 Slingsby Place London WC2E 9AB

Flat 2, 8 Vine Yard London SE1 1QL

Flat 1 Wiltshire House 2 Maidstone
Buildings MewsRed Cross Garden 50 Redcross Way
London

8 Southwark Street London SE1 1TL

Flat 12, Triangle Court 10 Redcross Way
LondonRed Cross Gardens 50 Redcross Way
SE1 1HAFlat 39, 10 Hilary Mews London SE1
1APFlat 32 Benbow House 24 New Globe
Walk

4 Hilary Mews London Southwark

Flat 1 Clink Wharf Clink Street

Flat 1 Hatters Court 99 Redcross Way

2 Redcross Way London Southwark

11 Vine Yard London SE1 1QL

2B Redcross Way London Southwark
SE1 9HR

Flat 2 8 Vine Yard London Southwark
SE1 1QL

Flat 16 Brandon House 10 Hilary Mews

City And Farmers Market Borough
Market 8 Southwark Street

Redcross Garden 50 Redcross Way
London

Bankside Community Space 18 Great
Guildford Street London

Flat 8, Brandon House 10 Hilary Mews
London

Flat 2 31 Union Street Southwark

28 Whittlesey St London SE1 8TA

12 Sussex House Maidstone Buildings
Mews London

Re-consultation:

Consultation responses received

Internal services

Design and Conservation Team [Formal]

Statutory and non-statutory organisations

Neighbour and local groups consulted:

44-48 Borough High Street London se1
1xw

218 Empire Square West London SE1
4NL

70 Cowcross Street London EC1M 6EJ

Flat 78, Brandon House 10 Hilary Mews
London

32 Tate close Romsey SO51 0BE

90 Guinness Court London SE1 3TA

Unit 13, 39 Gransden Avenue London
E83QA

Via Email

4th Floor Cannon Bridge House 25
Dowgate Hill

8 Southwark Street London SE1 1TL

COUNCIL FOR BRITISH
ARCHAEOLOGY De Grey House, St
Leonard's Place YORK

12 Clifton Road London DA14 6PY

11 Edithna Street London SW99JR

1 Priory Gardens London W4 1TT

Flat 2 8 Vine Yard London

153 kennington lane london se11 4ez

Flat 1 28 Clennam Street London

17 Touchard House Chart Street London

Flat 5, Triangle Court, 10 Redcross Way,
Triangle Court Triangle Court London
Bridge

92 symington house deverell street
london

23/AP/0387

79-161 Ilderton Road, London, Southwark, SE16 3JZ



Southwark Maps

50 m

Scale = 1:1323,000

25-Oct-2023

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Item No. 7.2	Classification: Open	Date: 7 November 2023	Meeting Name: Planning Committee (Major Applications) B
Report title:	Development Management planning application: Application 23/AP/0387 for: Full Planning Permission Address: 79-161 Ilderton Road, London, Southwark, SE16 3JZ Proposal: Redevelopment of the site to provide two separate buildings comprising large scale purpose built shared living units, conventional residential dwellings, flexible commercial floorspace, a not-for-profit café community use, children's playspace, public realm improvements, landscaping and other associated works.		
Ward(s) or groups affected:	Old Kent Road		
From:	Director of Planning and Growth		
Application Start Date	23.02.2023	Application Expiry Date	25.05.2023
Earliest Decision Date	14.07.2023	Extension of Time End Date	07.05.2024

RECOMMENDATIONS

1. That full planning permission be granted for application 23/AP/0387, subject to conditions, referral to the Mayor of London and the applicant entering into a satisfactory legal agreement.
2. That in the event that the legal agreement is not been entered into by 7 May 2024 the director of planning and growth be authorised to refuse planning permission for application 23/AP/0387, if appropriate, for the reasons set out in paragraph 725 of this report.

EXECUTIVE SUMMARY

3. A key redevelopment site in the Old Kent Road Opportunity Area, 79-161 Ilderton Road comprises a long rectangular plot of vacant brownfield land flanked on one side by Ilderton Road and on the other by the elevated railway line serving South Bermondsey Station. Although the nearest conservation areas and listed building are all more than 500 metres away, the former Baptist Chapel and 209-225 Ilderton Road, both of which are on the Council's draft list of locally listed buildings, are within 150 metres. Nearby to the east is the Millwall Football Club, while further to the south along Ilderton Road are numerous sites where tall buildings have been consented in recent years, with many of these now under construction.

4. The potential of the site to make a major contribution to the Council's homes and jobs targets is reflected in the adopted site allocation (NSP70) and the draft site allocation (OKR16), both of which identify the site as appropriate for delivering a significant quantum of new homes, floorspace and industrial uses.
5. This application proposes the construction of two separate buildings either side of a central publicly-accessible Pocket Park. The first of these buildings, the North Building, would be formed of two blocks, one of 27 storeys and the other of 18 storeys, linked by a 5-storey plinth/base element. The other building, the South Building, would also be formed of two blocks: Block C would be 16 storeys and Block D would be 10 storeys, with the two linked by a 5-storey plinth/base. In brief, the development would deliver:
 - 120 conventional (Class C3) affordable homes, in a tenure split of 65 social rent and 55 intermediate;
 - a Purpose Built Co-Living premises (hereafter referred to as PBCL), also known as Purpose Built Shared Living, comprising 605 individual studios;
 - a 123 square metre not-for-profit community café;
 - 363 square metres of flexible commercial space;
 - 460 square metres of flexible employment/business space, of which 334 would be dedicated affordable workspace; and
 - two new publicly-accessible open spaces, including a 570 square metre park at the centre of the site.



Image 01 (above): View of the proposal looking southwestwards from the junction of Rotherhithe New Road and Ilderton Road. Blocks A, B and C of the proposal can be seen in this view.

6. The application site benefits from planning permission under 18/AP/2497, which is extant but has not yet been technically implemented, to deliver a residential led scheme comprising two buildings expressed as a sequence of four block stepping down from north to south. While the scheme proposed by 23/AP/0387 would be of a different use and architectural design to the extant scheme, the disposition and heights of the four buildings would be broadly similar. The

building envelope established by 18/AP/2497 is a material consideration in the determination of this new planning application

7. The proposal would deliver an exemplary PBCL premises alongside 120 high quality affordable dwellings, the latter including a significant proportion of larger family units. Benefiting from well-proportioned and logically configured internal accommodation, a predominance of dual aspect, good levels of natural light, and access to generously sized external amenity spaces, the homes would achieve a high quality of residential design. These new dwellings would contribute towards local affordable housing and the Council's housing targets, thereby bringing tangible benefits for the local community. The housing offer is considered to be a substantial benefit of the application.
8. 946 square metres of employment-generating floorspace is proposed, arranged as six separate units, each providing an active frontage and contributing positively to the local streetscene. The applicant engaged extensively with local stakeholders at the pre-application stage, and the feedback received has informed the design of the proposal, with one of the commercial units being designated as a not-for-profit community café. The applicant has also agreed to initially market two of the proposed commercial units to supermarkets and gym operators only, these being uses the local community expressed a particular preference for. The Pocket Park will provide further community integration and health benefits.
9. The application site is situated in a location where tall buildings are considered appropriate, subject to demonstration that they would achieve an exemplary standard of design and meet the requirements of the London Plan and Southwark Plan in all other regards. Forming an interesting composition and possessing a strong urban character, and with robust and high quality materials specified throughout, the proposed buildings would achieve an exemplary standard of architectural design. They would be set within high quality public realm, including a generously proportioned new park, numerous new trees, soft landscaping and play facilities. The on-site landscape offer would be complemented by financial contributions towards off-site investment in public open space elsewhere in the Opportunity Area.
10. With regard to amenity and environmental considerations, although the proposal would result in daylight and sunlight impacts at nearby existing properties that depart from the BRE guidelines, the retained levels are still considered adequate for a dense urban area. At one location on site wind conditions would categorise as "unsafe" because of the proposed development; however, because this is not a location likely to be used frequently by pedestrians, on balance the local microclimate would remain comfortable.
11. Although the long-stay cycle storage facilities serving the PBCL would fall short of the minimum policy requirements, mitigation and monitoring commitments have been secured such that, on balance, refusal of planning permission would not be warranted. All other transport and highways matters have been resolved satisfactorily, with mitigation secured through a range of planning conditions and obligations.



Image 02: Visualisation looking northeast across Ilderton Road, with the Pocket Park visible in the centre of the image, Blocks A and B in the background, and Block C in the foreground.

12. As the report explains, the proposal would make efficient use of a prominently located and under-utilised site to deliver a high quality and sustainable development that accords with the Council's aspirations for the area. In addition to the economic benefits brought by this proposal, such as the employment generating uses including the two affordable workspace units, a range of financial contributions will be secured to offset the impacts of the development and assist with local and London-wide infrastructural investment.

PLANNING SUMMARY TABLES

13. **Conventional housing**
- | Homes | Private Homes | Private HR | Aff.SR Homes | Aff.SR HR | Aff.Int Homes | Aff.Int HR | Homes Total | HR Total |
|---------|---------------|------------|--------------|-----------|---------------|------------|-------------|----------|
| Studio | N/A | N/A | 0 | 0 | 4 | 6 | 4 | 6 |
| 1 bed | N/A | N/A | 4 | 8 | 25 | 50 | 29 | 58 |
| 2 bed | N/A | N/A | 20 | 60 | 24 | 72 | 44 | 132 |
| 3 bed | N/A | N/A | 34 | 170 | 2 | 10 | 36 | 180 |
| 4 bed + | N/A | N/A | 7 | 42 | 0 | 0 | 7 | 42 |
| Total | N/A | N/A | 65 | 280 | 55 | 138 | 120 | 418 |
14. **Commercial**
- | Use class and description | Existing GIA | Proposed GIA | Change +/- |
|---------------------------|--------------|--------------|------------|
|---------------------------|--------------|--------------|------------|

E [a] to (f) (Retail/services/dining)	0	486*	+486
E [g] i) (Office)	0	126	+126
E [g] ii) and iii) (Light industrial)	0		
B2 (Industrial)	0	0	0
B8 (Storage/Distribution)	0	0	0
E (Affordable workspace)	0	334	+334
C1 (Hotel)	0	0	0
Sui Generis	0	0	0
Employment	Existing no.	Proposed no.	Change +/-
Operational jobs (FTE) **	5	119** (max)	+114 (max)
* Although the 486 square metres of floorspace is intended to be operated as retail/services/dining use in the first instance, the applicant seeks a fully flexible Class E use (i.e. including the E [g] sub-category) in case efforts to find [a] to [f] tenants prove unsuccessful.			
* This is based on a maximum of 44 FTE positions in connection with the employment/business uses, a maximum of 50 FTE positions in connection with the commercial uses, and 25 FTE positions in connection with the PBCL.			

15.

<u>Parks and child play space</u>			
	Existing area	Proposed area	Change +/-
Public Open Space	0	630 sq.m	+630 sq.m
Play Space	0	1,131 sq.m*	+1,131 sq.m
* This includes a 518 square metre portion of the Public Open Space; the other 613 square metres is provided as part of the roof gardens within the South Building.			

16.

<u>Carbon Savings and Trees</u>			
Criterion	Details		
CO2 Savings	74% improvement on Part L of Building Regs 2021		
Trees Lost	0 x Category A	0 x Category B	0 x Category C
Trees Gained	25		

17.

<u>Greening, Drainage and Sustainable Transport Infrastructure</u>			
Criterion	Existing	Proposed	Change +/-

Urban Greening Factor	N/A	0.40	N/A
Greenfield Run Off Rate	7.66 l/s	5 l/s*	-2.66 l/s
Green/Brown Roof Coverage	0	818 sq.m	+818 sq.m
Electric Vehicle Charging Points	0	2	+2
Blue Badge Car Parking Spaces	0	6	+6
Cycle Parking Spaces	0	764	+764

18.

CIL and Section 106 (or Unilateral Undertaking)	
Criterion	Total Contribution
CIL (estimated)	£11,352,939.03 (pre-relief)
MCIL (estimated)	£2,778,230.00 (pre-relief)
Section 106 Contribution	As per the 'Planning obligations' section of this report

BACKGROUND INFORMATION

Site details

Location and description

19. The application site has an area of 0.598 hectares and is of a long rectangular shape. It is bounded:
- immediately to the east by the elevated railway line serving South Bermondsey Station, beyond which is the Millwall Football Club along with some commercial workshop units, all of which are within the London Borough of Lewisham;
 - immediately to the south by Zampa Road, on the opposite side of which is the Christ Apostolic Church with the buildings further south comprising a range of uses including light industry, manufacturing and the Ilderton Road Primary School;
 - immediately to the west by Ilderton Road, on the opposite side of which are the low-rise residential buildings of the Bramcote Estate; and
 - Immediately to the north by a tyre dealer and workshop ('Mehmet's Tyre Shop'), beyond which further to the north is the Ilderton Road Travellers' Site.

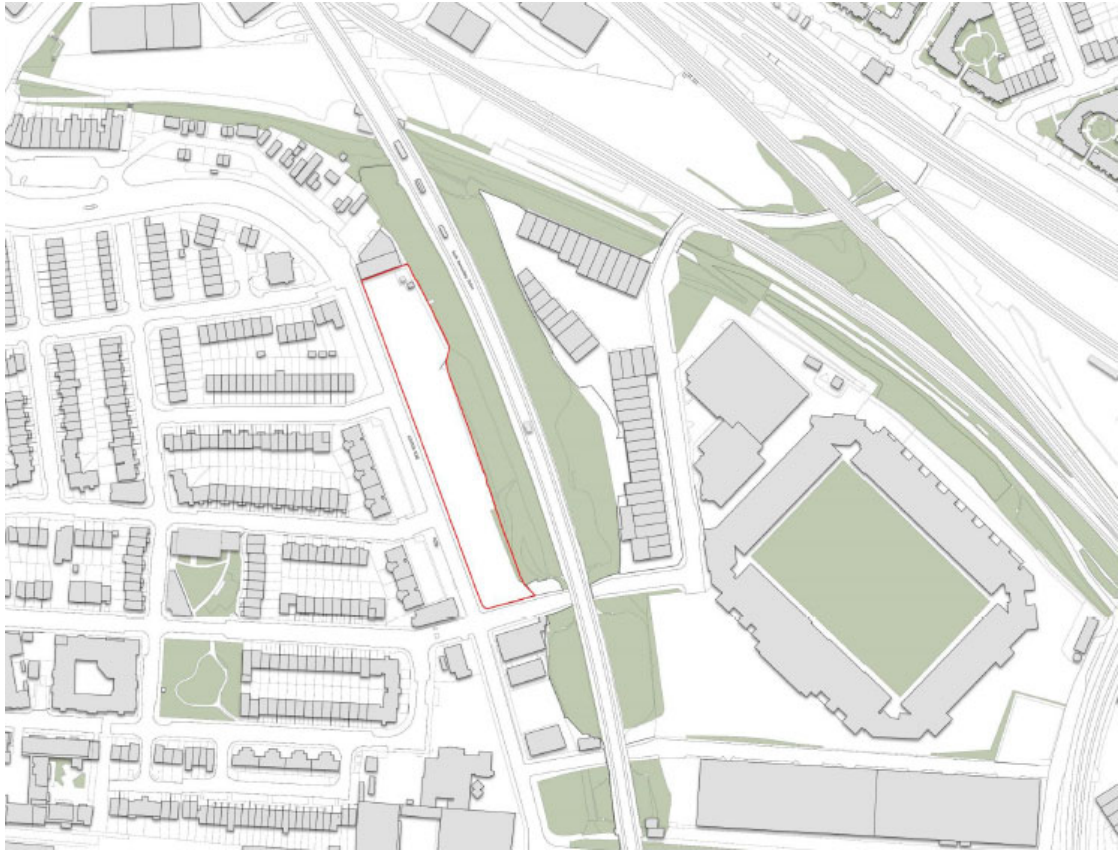


Image 03 (above): Location plan, showing the site edged in red.

20. The lawful use of the site is Sui Generis. Although currently vacant, the site was previously occupied by RS Joyner and Son who used the open yard space to store and sell second hand lorries and vans. The site contains no buildings or structures, and the land is a mix of hardstanding and vegetation. The highway-fronting perimeters of the site are secured by palisade fencing. One vehicular access point to the site exists via a dropped kerb, close to the junction of Ilderton Road and Ablett Street.



Image 04 (above): Photograph of the existing site, taken from Ilderton Road and looking in a southeast direction. The railway line and embankment can be seen in the background.

21. The applicant, Wittington Investments (Properties) Limited, acquired all interests in the site in early 2022 including Southwark Council freehold ownership of the site. The latter was subject to a long 125-year lease to Argon Capital who had an existing option to acquire the freehold.

Surroundings

22. Although of a predominantly residential and industrial character, the local area also contains commercial, educational, cultural and leisure uses as well as some places of worship.
23. The immediate surroundings currently comprise low-to-medium rise residential development and low-rise light industrial buildings. However, a short distance to the south around the Hatcham Industrial Estate and towards the southern half of Ilderton Road there are a number of much taller mixed-use buildings either under construction or recently completed. These are reflective of the intensification and densification the wider Opportunity Area is undergoing.

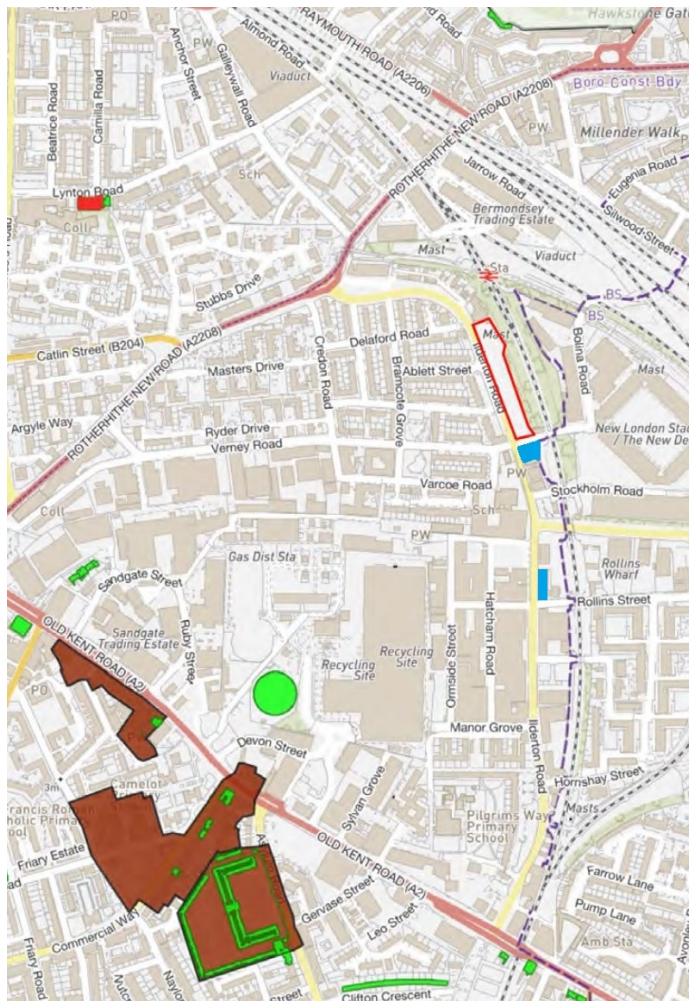


Image 05 (above): Aerial image of the site (edged in red), looking northwards, with key nearby transport infrastructure and redevelopment sites highlighted.

24. The land to the east is occupied by the Millwall Football Club, which is known as 'The Den', together with a small number of low rise commercial units. The land benefits from extant planning consent for a major mixed-use redevelopment (Lewisham Council reference number: DC/20/119706) including a series of towers of varying heights, with the tallest being 38 storeys, known as the "New Bermondsey Masterplan". The hybrid permission for this masterplan development obtained a resolution to grant in January 2021.

Designations

25. The following policy, socioeconomic and environmental designations apply to the application site:
- Site Allocation NSP70 (Hatcham Road, Penarth Street and Ilderton Road) in the Southwark Plan 2022;
 - Old Kent Road Area Vision AV13;
 - Old Kent Road Opportunity Area;
 - Old Kent Road Strategic Cultural Area;
 - Old Kent Road Action Area Core (the majority of the site, except the portion within the Urban Density Zone);
 - the Urban Density Zone (a small portion at the northern end of the site only);
 - Hot Food Takeaway Primary School Exclusion Zone;
 - Hot Food Takeaway Secondary School Exclusion Zone;
 - Flood Zone 3 (in an area benefitting from flood defences);
 - the Air Quality Management Area;
 - “East Central” Multi-Ward Forum Area; and
 - Community Infrastructure Levy Charging Zone 2.
26. The application site sits within the Core Area of the draft Old Kent Road AAP (hereafter referred to as the draft OKR APP). More specifically it sits within Sub-Area 4, ‘Hatcham, Ilderton and Old Kent Road (South)’. Within this Sub-Area, the application site forms part of the OKR 16 parcel, ‘Hatcham Road and Ilderton Road’, which covers 7.9 hectares of land and has an indicative capacity of 2,200 new homes and 2,698 additional jobs. While the majority of the OKR 16 parcel is designated as a Locally Significant Industrial area or as Strategic Protected Industrial Land within the draft OKR AAP and/or the Southwark Plan, the application site does not fall under either of these designations. The site is also located within the area covered by the Hatcham and Ilderton Design Code.
27. With regard to heritage designations, the site does not include any listed structures and is not in a conservation area. Christ Apostolic Church, which is located to the south of the site on the corner of Zampa Road and Ilderton Road, is designated as a building of architectural and historic interest in the draft OKR AAP. It is also on the draft Southwark Local List of locally listed buildings, along with a nearby terrace of late nineteenth- and early twentieth-century dwellings at 209-225 Ilderton Road.
28. The site is within the 'North Southwark and Roman Roads' Tier 1 Archaeological Priority Area.



- Grade II* listed buildings
- Grade II listed buildings
- Conservation area
- (Draft) locally listed
- Application site boundary
- Boundary between LB Southwark and LB Lewisham

Image 06 (left): Map showing the site in the context of heritage designations and the unadopted local list.

Image 07 (below): Photo of the Christ Apostolic Church.



29. With respect to strategic and borough views, the site is not within any of the Borough or London View Management Framework (including the wider corridors settings and the background regions) views. The site does fall within the extended cone of the background wider setting consultation area of LVMF Townscape View 23A.1, from the bridge over the Serpentine to Westminster. The site sits approximately 1.6 kilometre beyond the 23A.1 Wider Setting Consultation Area of this view.
30. There is no existing public space or trees within the application site. The nearest public green spaces are (in order of proximity):
- Pat Hickson Park located 100 metres (a 2 minute walk) to the south of the site, at the junction of Ilderton Road and Stockholm Road
 - Bramcote Park located 150 metres (a 3 minute walk) to the west of the site;
 - Bridgehouse Meadows located 350 metres (a 7 minute walk) to the southeast of the site; and
 - The 63 acre Southwark Park located approximately 500 metres (a 10 minute walk) to the north of the site.
31. Immediately to the east of the site is the South Bermondsey Railway Embankments Site of Importance for Nature Conservation (SINC).

32. With respect to transport connectivity, South Bermondsey Overground is the nearest railway station, located approximately 100 metres to the north. It offers connections towards London Bridge, West Croydon and Beckenham Junction. The nearest underground station is Canada Water, approximately 700 metres to the northeast. As part of the New Bermondsey masterplan a station is proposed on the Overground (east London) line, in-between Surrey Quays and Queens Road Peckham stations; the entrance to the new station would be on Surrey Quays Road approximately 300 metres southeast of the 79-161 Ilderton Road site.
33. The P12 bus provides a regular service along Ilderton Road, connecting to Camberwell and Surrey Quays. There also four different bus routes available from nearby Rotherhithe New Road / Galleywall Road, which provide connections to central London and Peckham. The pedestrian routes around the application site provide easy access to the bus stops and train stations.
34. With regard to local cycling infrastructure, National Cycle Route 425 runs east to west from Burgess Park to Rotherhithe. This route travels along a section of Ilderton Road and passes to the southwest of the site. In 2020, TfL completed construction of the first stretch of the new Cycle Superhighway 4 connecting Tower Bridge with Rotherhithe; the final stretch running from Rotherhithe along Lower Road to Greenwich is expected to be completed by autumn 2023. The route is approximately 850 metres northeast of the 79-161 Ilderton Road site, and once delivered will provide the site with enhanced cycle connectivity.
35. The current PTAL rating of the site lies between 1b and 3, which indicates a poor-to-average accessibility to public transport. However, this rating is predicted to rise to PTAL 4, indicating good public transport accessibility, once the planned transport network upgrades for the area have been completed.
36. The nearest short-stay cycle storage facilities are at the Ilderton Road shopping parade approximately 200 metres to the northwest of the site. These facilities comprise a bank of twelve Sheffield stands (24 spaces).
37. With respect to parking and servicing infrastructure locally, there are:
- five Blue Badge parking spaces nearby (these are all within Bramcote Estate, at distances of between 125 metres and 175 metres from the site);
 - opportunities for ad hoc on-street parking within Bramcote Estate;
 - four Car Clubs, as follows:
 - Zipcar on Verney Road, 500 metres away (a 10 minute walk);
 - Zipcar on Lynton Road, 500 metres away (a 10 minute walk);
 - Zipcar Club on Rymouth Road, 600 metres away (a 12 minute walk);
 and
 - one loading bay (accommodating up to four small vehicles) on Penarth Street, approximately 400 metres southwest of the site.
38. The two roads adjacent to the site, Ilderton Road and Zampa Road, are adopted highways. Both of these highways are also subject to a Local Development

Order (LDO), approved by Southwark Cabinet on 13 June 2023. The LDO permits the construction of an underground network of 7 kilometres of insulated pipes to carry heat from the South-East London Combined Heat and Power (SELCHP) facility in South Bermondsey to properties around Old Kent Road and Peckham for the purposes of supplying heating and hot water.

39. The site falls outside the safeguarded area of the potential future Bakerloo Line Extension promoted by Transport for London.

Details of proposal

40. This application seeks full planning permission for the redevelopment of the site to provide two separate buildings (the 'North Building' and the 'South Building'), each with a single-storey basement. The two buildings would be separated by a central publicly-accessible open space. Each building would be expressed as two blocks linked by a five-storey plinth/base; as an architectural composition, this would create series of four blocks, decreasing in height from north to south.



Image 08 (above): East elevation of the proposed development (i.e. looking from Ilderton Road), with Blocks D to A (left to right) interspersed by the pocket park.

The North Building

41. The North Building would comprise two blocks, Blocks A and B, rising from a five-storey plinth/base. Block A would be 27 storeys in height plus additional rooftop plant (90.53 metres above ground level, 91.73 metres above Ordnance Datum). Block B would be 18 storeys in height plus additional rooftop plant (62.85 metres above ground level, 64.05 metres above Ordnance Datum). A single-storey basement would span full footprint of the building.

42. With the exception of a portion of the ground floor, the North Building would be a dedicated PBCL premises offering the following internal accommodation and outdoor facilities:

- 605 PBCL studios in a range of sizes (each providing a queen-size or double bed, lounge and dining space, kitchenette, en-suite shower room and storage);
- front of house services and facilities (lobby, 24 hour reception, parcel room etc.);
- a range of shared internal amenity spaces (3,018 square metres in total), including:
 - flexible workspaces;
 - a well-being studio and gym;
 - a recording studio;
 - a cinema;
 - games rooms;
 - shared kitchen and dining facilities;
 - laundry facilities; and
- four different outdoor amenity spaces (645.7 square metres in total) in the form of landscaped roof terraces at Levels 05, 17 and 26 of the building.

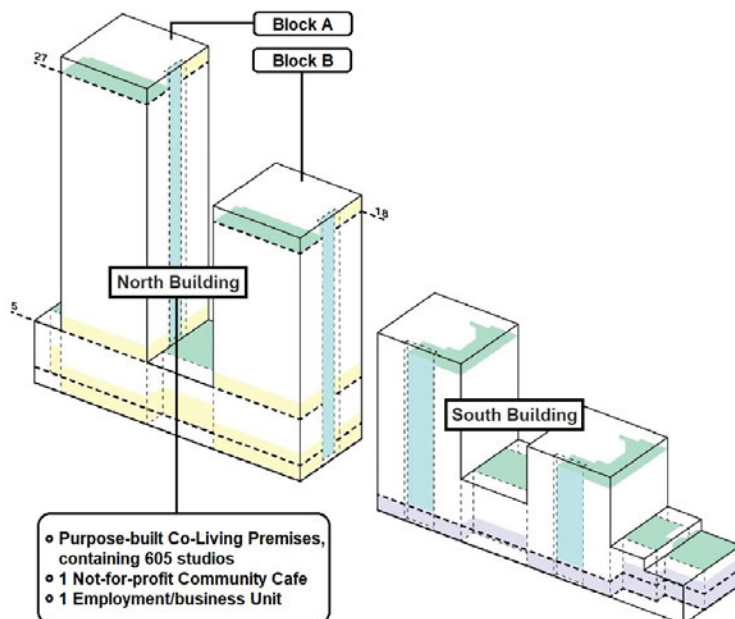


Image 09 (above): Diagram of the proposed development, highlighting the North Building and providing key details about the uses it would contain. **Image 10** (above): View of the North Building, as seen from the north.

43. In addition to the residential accommodation, the North Building would contain an employment/business unit (a Class E[g] use) and a not-for-profit community café (a mixed Class E[c] and Class F2[b] use). These would both be located at ground floor level with a principal entrance on Ilderton Road. Together, the two units would provide 249 square metres (GIA) of non-residential floorspace. The lobby to the PBCL, spanning a long section of the Ilderton Road façade and featuring multiple glazed openings, would complete the North Building's ground floor frontage.

44. With regard to the form and appearance of the development, following the principles established by the extant planning permission, the base/plinth element would be of a broadly rectangular footprint occupying most of the site's width. The two blocks rising out of the base/plinth element would each have an H-shaped floorplate extruded to full height. These two forms would be terminated by a crown comprising full height glazed screens framed by masonry columns and a stone beam.
45. The North Building's façades have been conceived in a regular gridded arrangement, with the bays formed of glazed openings and warmly coloured reconstituted stone, interspersed by wide piers clad in red brick. The bays would be of a slightly different detailed composition to their counterparts at the South Building, featuring concave rather than straight lintels and dark rather than red window and door frames. The façade modules at the lower levels, closer to street level views, would receive an additional level of detail and articulation. To provide visual interest up the full height of the building, the location of internal amenity spaces would be marked externally though the use of double-module bays glazed from floor to ceiling.

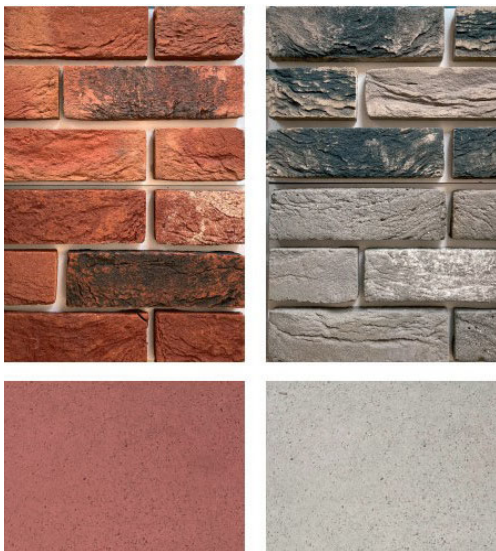


Image 11 (above): The two tones of brick and masonry to be used in the facades of the North Building.



Image 12 (above): View of the base of the North Building, looking northwards from outside the Pocket Park.

46. At the ground level, soft landscaping would be provided along the North Building's Ilderton Road frontage. Alongside widened footways, an on-street fully inset layby measuring 12 metres in length would be provided as part of the public realm for the purposes of serving the development; it would be positioned centrally relative the front façade of the building, directly outside the main entrance to the PBCL. A small off-street gated parking area is also proposed, to the northern side of the building, containing three Blue Badge bays for use by eligible residents of the PBCL.

The South Building

47. Similarly to the North Building, the South Building would comprise two blocks, Blocks C and D, linked by a plinth/base of 5 storeys. Block C would be 16 storeys in height plus additional rooftop plant (53.88 metres above ground level, 55.08 metres above Ordnance Datum). Block D would stand 10 storeys tall with additional rooftop plant (35.43 metres above ground level, 36.63 metres above Ordnance Datum). The South Building would incorporate a single-storey basement spanning the entirety of the building footprint.
48. The proposed building would be almost entirely given over to housing, delivering:
- 65 flats (Class C3) in social rent tenure, 10 of which would be wheelchair accessible; and
 - 55 flats (Class C3) in shared ownership tenure, 2 of which would be wheelchair accessible; and
 - associated communal outdoor amenity spaces, a dedicated Blue badge car park for up to 3 vehicles, refuse storage and cycle storage facilities.

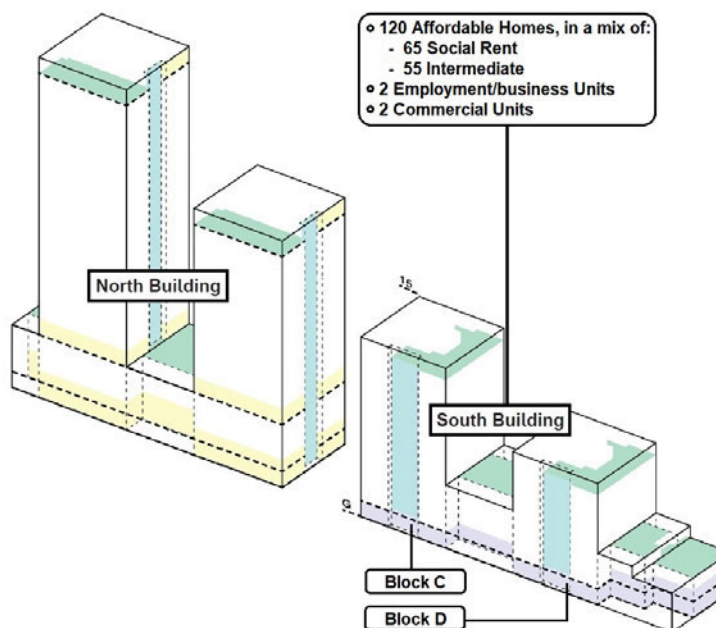


Image 13 (above): Diagram of the proposed development, highlighting the South Building and providing key details about the uses it would contain. **Image 14** (above): View of the South Building from Zampa Road.

49. The South Building would also contain two flexible community units at ground floor level (Class E), one of which has been designed with a gym in mind and the other intended for convenience retailing. These would both be located at ground floor level with principal frontages onto Ilderton Road. Additionally, the South Building would include two affordable workspace units (Class E[g]), one at ground floor level and the other primarily at first floor level but with a ground floor entrance off Zampa Road. The latter has been designed to allow for subdivision into up to six individual micro-studios, the applicant being of the view that these would be well lent to occupation by artists. In total, the four non-

residential units within the South Building would contain 697 square metres (GIA) of floorspace.

50. With regard to the South Building's form and appearance, the base/plinth floorplates would be more faceted in comparison to their counterparts at the North Building, creating recessed commercial bays along the Ilderton Road frontage and a pair of open-sided courtyards on the building's eastern elevation. The two blocks rising out of the base/plinth element would each have a cruciform floorplate with the corners squared off through the addition of dual aspect balconies. Both of the blocks would –like Blocks A and B at the North Building– be terminated by a crown comprising full height glazed screens framed by masonry columns and a stone beam.
51. The façade modules on the lower levels of the South Building would have a combination of projecting balconies with solid textured parapets and curved parapets. Window, door and balcony frames would all be finished in a red/copper tone. As with the North Building, the material palette would be composed of red brick and warm coloured masonry, but in slightly different tones to the neighbouring building to provide some differentiation.

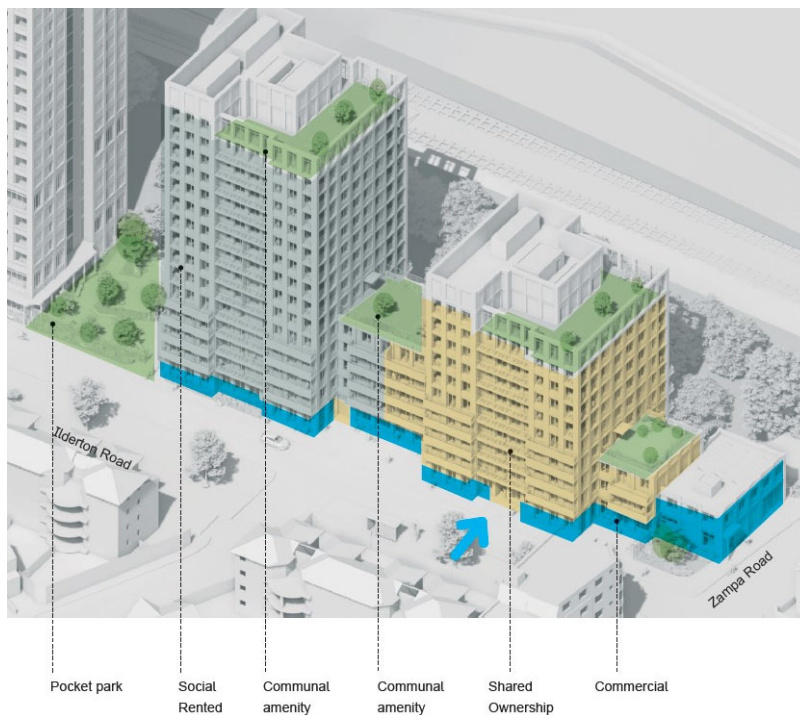


Image 15 (above right): Isometric of the South Building showing the distribution of the proposed uses and location of green spaces.

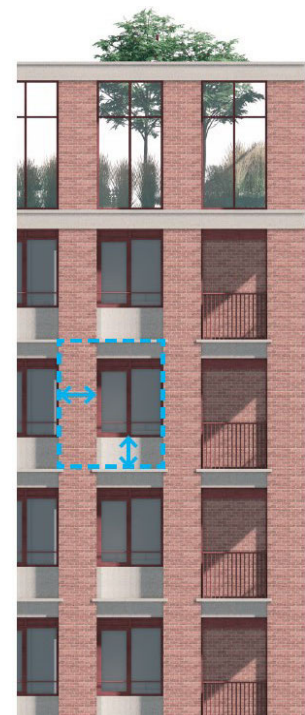


Image 16 (above): Rendered elevation of the South Building

52. At the ground level, the public realm along the South Building's Ilderton Road frontage would be mainly hard surfaced; however, there would be occasional at-grade planting beds. An on-street fully inset layby measuring 12 metres in length would be provided as part of the public realm for the purposes of serving the development; it would be positioned centrally relative the front façade of the building, directly outside the entrance to one of the proposed flexible

commercial units. An integral three-bay car park is also proposed at the rear of the building and accessed from Zampa Road.



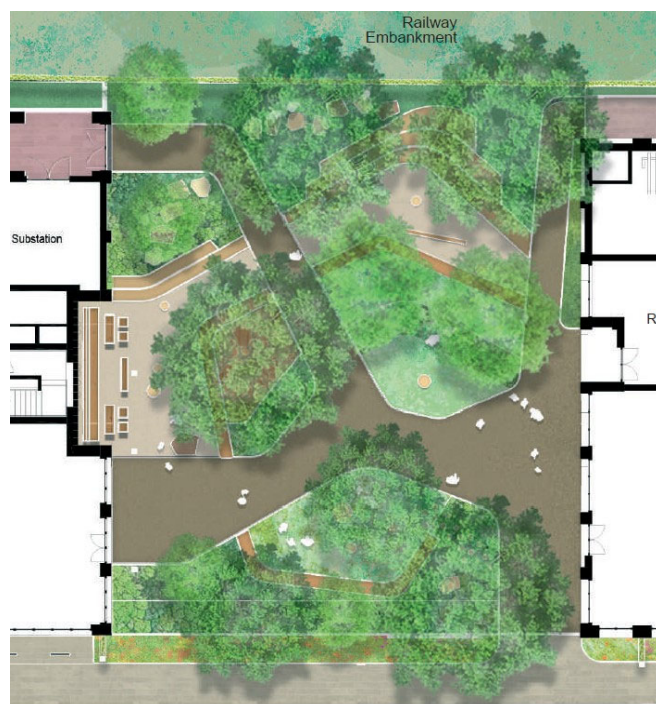
Image 17 (above): East elevation of the proposed development (i.e. looking from Ilderton Road), with the pocket park located between the blocks.

Pocket park

53. Approximately 9.5% of the site is to be given over to a Pocket Park, a publicly-accessible open space of 570 square metres. To be located in-between the North and South Buildings, it would provide hard- and soft-landscaping, including 12 trees, along with play facilities and outdoor furniture.
54. Underpinned by the concept of a 'secret garden', the Pocket Park would be configured as three 'soft' spaces containing lawn and shrubbery. One would also include a raised deck, intended to provide a flexible surface for play. Additional play areas –containing equipment such as a slide and balancing beams, spinning bowls and stepping stones– would be finished with rubber crumb play surfacing. The shape of three 'soft' spaces is the consequence of a series of paths that dissect the park; each of those paths would provide pedestrian access to different parts of the development, such as the entrance of the social rent housing within the South Building, and the recording studio and secure cycle stores within the North Building.
55. The Pocket Park would be framed along part of its northern edge by the glazed frontage of the not-for-profit community café. Set within this glazed frontage would be a set of doors providing direct access from the café onto the park, but there would be no spill-out external dining area. The southern side of the space would be fronted by the entrance/lobby of the social rent housing as well as one of the commercial units, the latter to have a set of doors opening onto the park.

56. The boundary line between the park and the Ilderton Road footway would be defined by a low-level decorative fence formed of steel with a Corten-style finish, to the front of which would be an at-grade planting bed. The applicant envisages the Pocket Park as a social space where residents of the proposed development and members of the wider community, across all age groups, would be able to come together.

Image 18 (right): Rendered plan of the proposed Pocket Park.



57. In addition to the Pocket Park, the publicly-accessible open space offer would include a micro-garden, located at the junction of Zampa Road and Ilderton Road. This 60 square metre space would contain a small grassed area bordered by planting and rock features, as well as a pair of trees.

Planning history of the application site and nearby sites

58. Appendix 3 sets out in detail the full planning history for the site as well as details of relevant applications on adjoining or nearby sites. The site benefits from extant planning permission, the reference number for which is 18/AP/2497.
59. The extant scheme was formally approved on 21st February 2022, following a resolution to grant in May 2020. The scheme comprises two buildings each formed of two blocks linked by a podium; in-between these two buildings would be a landscaped pocket park. The proposed buildings decrease in scale towards Zampa Road, with the tallest element standing to a height of 28 storeys and the lowest element rising to 3 storeys. The scheme is residential led with an affordable housing component of over 35% by habitable room, together with commercial and retail spaces across the three lowest storeys of the development.



Image 19 (above): Massing model of the residential-led development consented under the 18/AP/2497 planning permission.



Image 20 (above): Visual of the tallest part of the 18/AP/2497 scheme.

60. The 23/AP/0387 application has the same 'red line boundary' as the newly-proposed scheme and the proposal is similar in its composition as two separate buildings framing a central publicly-accessible open space. However, there are some key differences, as follows:
- the 23/AP/0387 scheme would deliver a mix of PBCL and conventional (Class C3) housing, whereas conventional housing was the sole residential typology proposed under 18/AP/2497;
 - the residential elements of the 23/AP/0387 would deliver a total habitable room equivalent of 1,023, whereas the total habitable room equivalent under 18/AP/2497 was 966;
 - the 23/AP/0387 scheme would deliver a lesser quantum of flexible commercial and employment floorspace (946 square metres) compared to the 18/AP/2497 scheme (2,267 square metres);
 - the 23/AP/0387 scheme would deliver a greater quantum of affordable workspace (316 square metres) compared to 18/AP/2497 scheme (272 square metres);
 - the taller blocks proposed in the 23/AP/0387 scheme would, in comparison with the taller blocks in 18/AP/2497, be of a simpler and slightly widened floor-plate to allow for a more efficient core to unit ratio;
 - Architecturally, the 23/AP/0387 proposal would have a visually lighter elevational treatment and a stronger vertical expression compared to the 18/AP/2497 buildings, the latter having strongly geometric façades composed of diamond-shaped panels and windows.
61. The table and cross-section below provide a comparison of the consented storey heights against those proposed by this new planning application:

Storey heights: Summary table			
Building, Block	Consented no. of storeys (metres AOD)	Proposed no. of storeys (metres AOD)	Change proposed vs consented no. of storeys (metres AOD)
North, Block A	28 (93.350)	27 (88.725)	-1 (-4.625)
North, Block B	17 (60.150)	18 (64.050)	+1 (+2.900)
South, Block C	14 (50.475)	16 (48.450)	+1 (-2.025)
South, Block D	9 (33.075)	10 (32.900)	+1 (-0.175)

Note: The storey heights cited above (including the associated 'metres AOD' references) exclude unenclosed rooftop structures (pergolas, crown upstands etc) as well as any enclosed rooftop storeys used solely for plant or lift overrun.

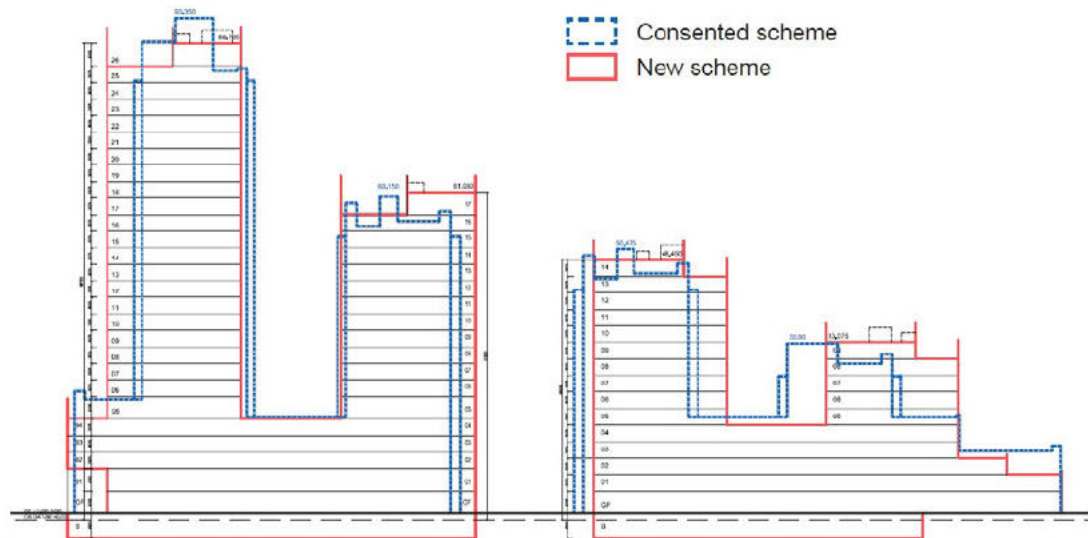


Image 21 (above): Comparison of the heights of the consented scheme 18/AP/2497, in blue, and the new proposal 23/AP/0387, in red.

62. As an extant planning permission with no major planning barriers preventing technical implementation, the development proposed by 18/AP/2479, and the impacts it would cause as well as the mitigation it secured, are relevant material planning considerations in the determination of the new planning application here-under consideration.

Image 22 (right): View of the 18/AP/2497 scheme looking south along Ilderton Road.



Pre-application engagement and mid-application amendments

Pre-application engagement

63. Planning application 22/AP/1068 was submitted following a detailed pre-application enquiry, the reference number for which is 22/EQ/0148. The pre-application process involved five meetings with Council planning officers, one meeting with Council transport and highways officers, a meeting with the GLA and the applicant's attendance at the Old Kent Road Community Review Panel. During the course of the pre-application engagement, the applicant undertook social value research to see how the PBCL and conventional housing uses could be integrated optimally, and also made various amendments to the scheme design such as:

- developing the architecture of the buildings to improve their legibility;
- refining the massing of the North Building to improve its efficiency and legibility;
- developing the mix and layouts of the proposed residential units;
- re-configuring the Pocket Park landscaping; and
- Introducing wind mitigation features.



Images 23, 24 and 25 (above, left to right): Evolution of the massing of the North Building through the course of the pre-application process, showing Block A developing into a slimmer and more refined form, simultaneous with a gradual reduction in the height of the podium/plinth element.

64. At the end of this iterative process, the pre-application enquiry was closed and no formal response letter was issued by the Council.
65. With regard specifically to the Community Review Panel, the feedback was broadly positive. A summary of the Panel's feedback, and how the applicant sought to address the issues raised, can be found in a later part of this report entitled 'Consultation responses from external consultees'.
66. The proposals were not presented to Southwark Council's Design Review Panel. The reasons for this are explained in the 'Design' section of this report.

Mid-application amendments

67. Over the course of the planning application process, the applicant has made further refinements to the proposal in response to concerns raised through the consultation process and/or issues highlighted by officers.

68. With respect to building design, changes included:
- the inclusion of an additional stair core in Blocks C and D to ensure compliance with emerging Fire Safety regulations (it is important to note that the applicant held a meeting with HSE on 1st June 2023 to present the strategy, at which HSE provided their agreement in principle to the revised strategy);
 - the addition of one floor to Block C, along with changes to the internal layouts, to partially offset the floorspace losses resulting from the additional stair cores, as well as to increase the number of social rent 4 bedroom apartments and reconfigure a small number of one-bedroom apartments into studios (this maintained the overall level of affordable housing at 40%); and
 - the removal of canopies and fins from the North Building.
69. With respect to housing mix, and layout and quality of accommodation, changes included:
- an increase in the number of conventional dwellings from 118 to 120;
 - a decrease in the number of PBCL studios from 609 to 605;
 - an increase in the number of wheelchair accessible PBCL units to 10% of the total provision, along with a reorganisation of the accessible units to achieve a more even distribution up the profile of the building;
 - a strategy for preventing overlooking between proposed windows located in relatively close proximity to each other; and
 - the incorporation of dedicated spaces into the PBCL premises in which residents can air-dry clothes.
70. With respect to landscape, changes included:
- improvements to quality and extent of greening, helping to improve the UGF to 0.4; and
 - a reduction in the height of the fence separating the Pocket Park from Ilderton Road, with the intention of making the space feel more inviting and accessible to the general public.
71. With respect to transport and highways, changes included:
- changes to the layout of highways, footways and laybys along Ilderton Road;
 - changes to the cycle storage proposals; and
 - changes to the bin store arrangements.
72. The applicant also supplied a series of supplementary and revised reports to provide clarifications and corrections with regard to various issues raised by consultees and officers. Other matters resolved during the course of the planning application process included commitments to certain planning obligations and other mitigation.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

73. The main issues to be considered in respect of this application are:
- Consultation responses from members of the public and local groups;
 - Environmental impact assessment;
 - Principle of the proposed development in terms of land use;
 - Development viability;
 - Tenure mix;
 - Dwelling size mix;
 - Quality of residential accommodation – PBCL;
 - Quality of residential accommodation – Conventional housing;
 - External amenity space and young people’s play space
 - Amenity impacts on nearby residential occupiers and surrounding area;
 - Design;
 - Public realm, landscaping and trees;
 - Green infrastructure, ecology and biodiversity;
 - Archaeology;
 - Transport and highways
 - Environmental matters;
 - Energy and sustainability;
 - Communications and aviation;
 - Socio-economic impacts
 - Planning obligations;
 - Mayoral and Borough Community Infrastructure Levies;
 - Community engagement;
 - Consultation responses; and
 - Community impacts, equalities and human rights.
74. These matters are discussed in detail in the ‘Assessment’ section of this report.

Legal context

75. 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 draft Old Kent Road Area Action Plan 2020. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers determining planning applications to pay special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest which they possess.
76. There are also specific statutory duties in respect of the Public Sector Equalities Duty, which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

Adopted planning policy

77. The statutory development plan for the borough comprises the London Plan 2021 and the Southwark Plan 2022. The National Planning Policy Framework 2023 is a material consideration but not part of the statutory development plan. A list of policies which are relevant to this application is provided at Appendix 2. Any policies which are particularly relevant to the consideration of this application are highlighted in the report.

ASSESSMENT

Consultation responses from members of the public and local groups

78. Consultation with members of the public was first conducted in March 2023. Letters were sent to local residents, the application was advertised in the local press and site notices were displayed. Comments were received from 4 respondents. The table below summarises the number of representations received during this period:

<u>Original round of consultation: Summary table</u>		
Total number of respondents: 4		Total number of responses: 4
The split of views between the 4 respondents was:		
In objection: 0	Neutral: 0	In support: 4

79. As mentioned in an earlier part of this report, a number of amendments were made to the application over the course of the determination process. To ensure the public was made aware of the changes, re-consultation was conducted in mid July 2023. The table below summarises the number of representations received in response to the re-consultation:

<u>Re-consultation: Summary table</u>		
Total number of respondents: 0		Total number of responses: 0
The split of views between the 2 respondents was:		
In objection: 0	Neutral: 0	In support: 0

Reasons in support

80. Listed below are the material planning considerations raised in support of the planning application by the consultation responses.

Residential uses

- 81.
- The location is well-suited to new homes;
 - the proposed affordable housing is needed by the local community;
 - the proposed housing (affordable and PBCL) will help contribute towards meeting the needs of local people living within Southwark; and
 - the proposed PBCL provides a housing typology well-suited to young people looking to sustain a reasonable income.

Commercial and community uses

- 82.
- The proposed shops, community uses and affordable workspace are all welcome;
 - the proposal will benefit local people who live and work in South Bermondsey, as well as the Ilderton Primary School pupils and their families; and
 - the not-for-profit community café proposals will have a positive impact on the local community.

Developer engagement

- 83.
- The developer has shown that they are willing and keen to engage with the community;
 - the developer may be willing to support improvements to the Ilderton Primary School playground; and
 - the developer has consulted a potential social housing registered provider (Metropolitan Thames Valley Housing) on design, unit mix and split of tenures to ensure the affordable homes are designed to meet the housing needs of local people.

Environmental impact assessment

84. Environmental Impact Assessment is a process reserved for the types of development that by virtue of their scale or nature have the potential to generate significant environmental effects.
85. In August 2022, the applicant requested that the Local Planning Authority issue a screening opinion as to whether the proposed development, due to its proposed size and scale, would necessitate an Environmental Impact Assessment (EIA). The reference number for this Screening Opinion is 22/AP/2766.
86. The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 set out the circumstances in which development must be underpinned by an EIA. Schedule 1 of the Regulations sets out a range of development, predominantly involving industrial operations, for which an EIA is mandatory. Schedule 2 lists a range of development types for which an EIA might be required due to the potential for significant environmental impacts to arise. Schedule 3 sets out that the significance of any impact should include

consideration of the characteristics of the development, the environmental sensitivity of the location and the nature of the development.

87. The range of developments covered by Schedule 2 includes 'Urban development projects' where:
- the area of the development exceeds 1 hectare and the proposal is not dwellinghouse development; or
 - the site area exceeds 5 hectares.
88. The application site is 0.598 hectares and as such the proposal does not exceed the Schedule 2 threshold. Consideration, however, should still be given to the scale, location or nature of development, cumulative impacts and whether these or anything else are likely to give rise to environmental impacts of more than local significance. Having carried out its Screening in accordance with the regulations, the Council issued its Opinion to the applicant in November 2022 concluding that the proposed development did not constitute EIA development. The full Screening Opinion is available to read/download from the Council's Public Access for Planning register.
89. Notwithstanding the Screening Opinion, the Council is still required to review the proposal at planning application stage in case of any changes that may have occurred, for example to the proposal or to the baseline environmental conditions, since the date of the Screening and consider whether any of those are such that the planning application proposal would give rise to any significant environmental impacts that may make the proposal EIA development.
90. Planning application 23/AP/0387 proposes a housing-led scheme comprising a series of buildings, the disposition and heights of which are similar to those established by the previous/implemented planning consent on this site, together with public realm improvements and other associated works. The development is of a scale appropriate to its urban setting and is unlikely to give rise to any significant environmental impacts. Those impacts which are identified through the various submitted reports and studies can be mitigated through appropriate conditions or obligations.
91. For the above reasons, an EIA is not required in respect of the proposed development.

Principle of the proposed development in terms of land use

Existing lawful use

92. The existing site is a vacant hard-surfaced open air yard. Historically it was in residential use but was cleared after suffering bomb damage in the war; since then, it has remained a cleared site except for the installation of a telecommunications tower a number of years ago. Most recently, it was occupied by RS Joyner and Son to hold redundant trucks before being sold

online. The telecommunications tower was removed in mid-2020, leaving the site completely empty. Its lawful use is considered to be sui generis.

93. Given the above, there are no operable land uses located at the site —and, with this, no businesses or jobs— which have any degree of policy protection. The principle of development therefore depends on the suitability of the proposed uses against the development plan policies. The following paragraphs provide this assessment.

Relevant policy designations

Overarching strategic policy objectives

94. The National Planning Policy Framework (NPPF) was updated in 2023. At the heart of the NPPF is a presumption in favour of sustainable development. The framework sets out a number of key principles, including a focus on driving and supporting sustainable economic development. Relevant paragraphs of the NPPF are considered in detail throughout this report. The NPPF also states that permission should be granted for proposals unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.
95. The Good Growth chapter of the London Plan includes GG2 “Making the Best Use of Land” and GG5 “Growing a Good Economy”, which are relevant to the proposal. To create sustainable mixed-use places that make the best use of land, objective GG2 states that those involved in planning and development must enable the development of brownfield land, particularly in opportunity areas and town centres, and prioritise sites that are well connected by public transport. It also encourages exploration of land use intensification to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. Objective GG5 states that to conserve and enhance London’s global economic competitiveness — and ensure that economic success is shared amongst all Londoners— those involved in planning and development must, among other things:
- promote the strength and potential of the wider city region;
 - ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning;
 - provide sufficient high-quality and affordable housing, as well as physical and social infrastructure;
 - help London’s economy to diversify; and
 - plan for sufficient employment space in the right locations to support economic development and regeneration.

Old Kent Road Opportunity Area

96. The site is located within the Old Kent Road Opportunity Area 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. The Old Kent Road Opportunity Area is identified within the London Plan as having an indicative employment capacity of 5,000 and an indicative residential capacity of 12,000 homes.

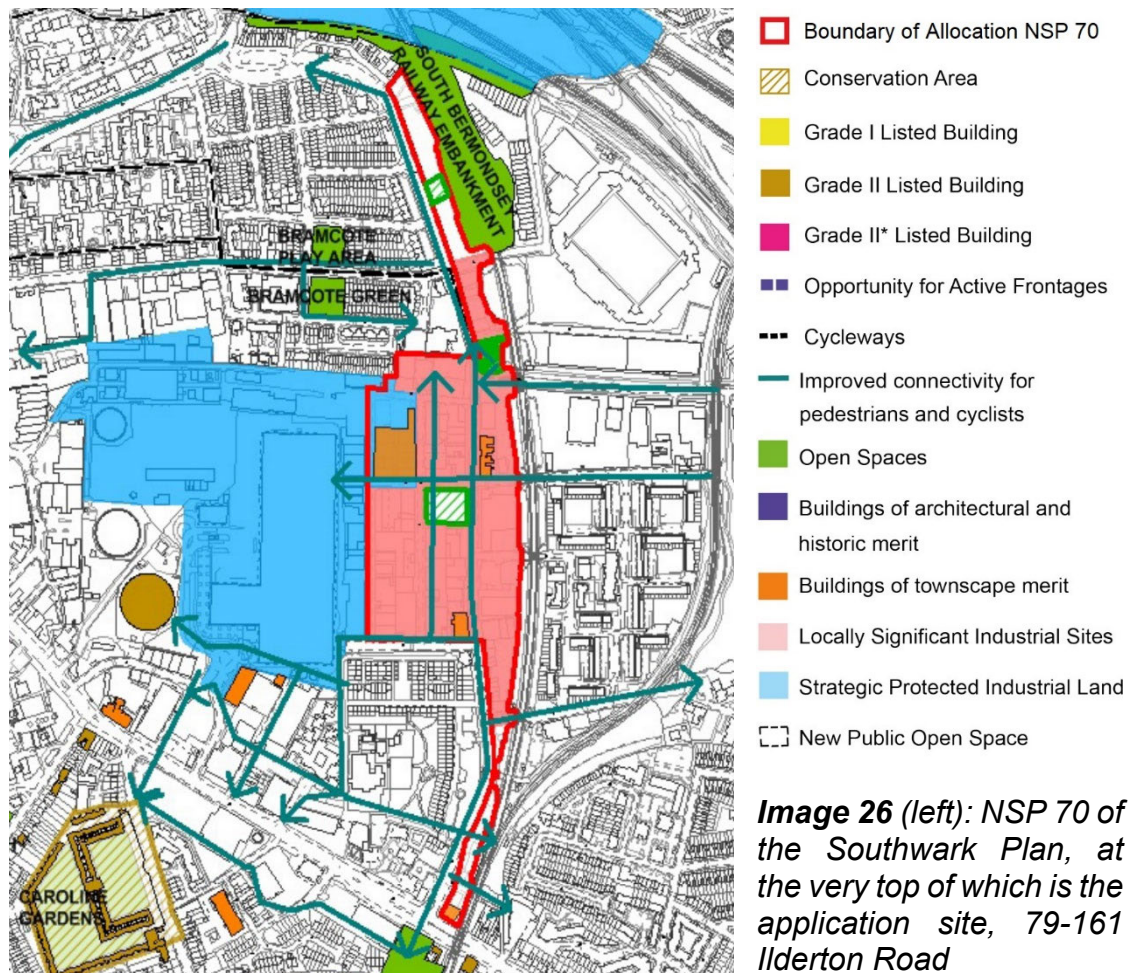
97. London Plan Policy SD1 encourages opportunity areas to:
- optimise residential and non-residential output;
 - optimise density; and
 - contribute towards meeting (or where appropriate) exceeding the minimum guidelines for housing and/or indicative estimates for employment capacity.
98. The Old Kent 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; and
 - 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.
99. The Old Kent Road Area Vision also states that the OKR Area Action Plan will set out the physical framework for enabling the community to realise its potential. The Council is in the process of preparing this Area Action Plan 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 OKR AAP (Regulation 18) was published in December 2020. As the document is still in draft form, it can only be attributed limited weight.
100. The London Plan specifically recognises the value of the proposed Bakerloo Line extension from Elephant and Castle to Lewisham and beyond, which would increase the connectivity and resilience of the Old Kent Road Opportunity Area while also reducing journey times to key destinations.

Southwark Plan Site Allocation

101. The Southwark Plan 2022 includes a site allocation, NSP 70 'Hatcham Road, Penarth Street and Ilderton Road', within the northernmost portion of which the application site falls. NSP 70 states that redevelopment of the site must:

- 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 falling within either of these use classes:
 - E(g)(iii) [any industrial process/use which can be carried out in any residential area]; or
 - B8 [storage and distribution]; and
- provide public open space of at least 1,990 square metres.

102. The allocation also says that redevelopment may provide retail, leisure, arts, culture and/or community uses.



OKR AAP Site Allocation

103. The application site is located within the OKR 16 parcel of the draft AAP. This parcel, for which the draft AAP sets out a future growth vision, has a boundary

identical to that of Southwark Plan Site Allocation NSP 70. Elements of the OKR 16 vision that are relevant to the 79-161 Ilderton Road site are:

- depot and industrial uses will be brought forward on land on the east side of Ilderton Road, where appropriate within mixed use development that provides new homes;
- new pocket parks will be delivered as well as greener and safer streets to improve the environment for people walking and cycling;
- new homes will be delivered to help create a vibrant new neighbourhood in which people can live and work; and
- the thriving creative business community will continue to represent the identity of the area.

104. The draft AAP sets out some 'must' deliverables of redevelopment within OKR 16. Those applicable to the 79-161 Ilderton Road site are:

- deliver new homes; and
- replace existing employment floorspace and provide a range of employment spaces (these must be consistent with the building and land use types shown in Figure SA4.3, see right); and
- provide industrial uses; and
- enable new east to west walking and cycling connections to the proposed Livesey Park; and
- provide a new cut-through pedestrian connection from the north of Ilderton Road through the arch at South Bermondsey Station.

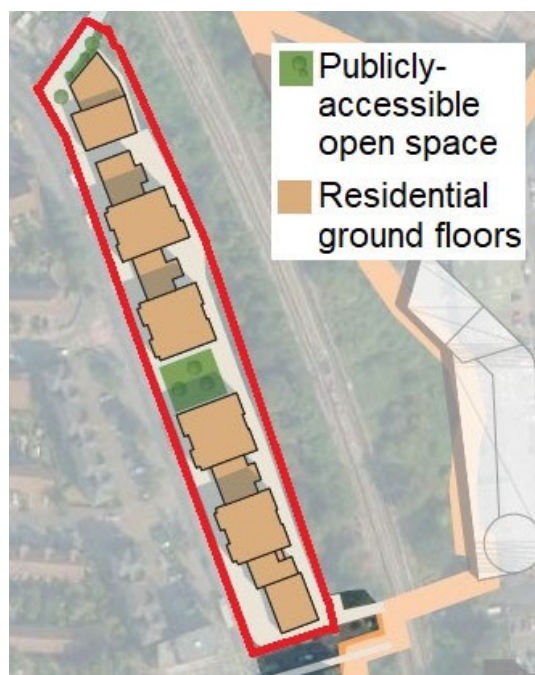


Image 27 (above) Figure SA4.3 of the draft AAP, 'Building Typologies and Land Uses', cropped to the application site (edged in red)

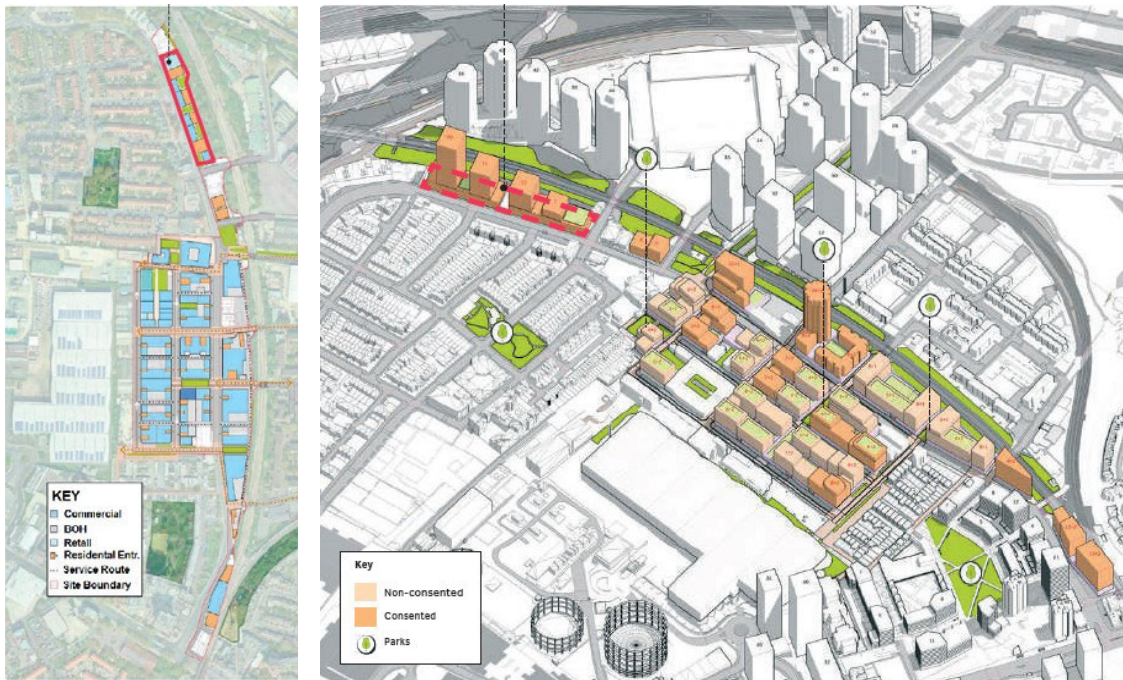
105. The draft AAP advises that redevelopment within OKR 16 may provide retail, community and education uses.
106. The draft APP goes on to advise that buildings in OKR 16 should be designed to reflect the area's robust and functional industrious character.

Hatcham and Ilderton Roads Design Code

107. The site is also subject to the Hatcham and Ilderton Roads Design Code, which sets targets and aspirations applicable to all new development within the area. The Code, which was prepared in accordance with the baseline standard of quality and practice set out in The National Model Design Code, is a continuation of the draft AAP, setting out in a greater level of detail the key design principles that developers will be expected to follow in order to gain

planning permission. Although it is not intended to be absolutely prescriptive, the Code defines the parameters within which developments will be expected to come forward more tightly than the draft AAP. The Design Code for OKR16 will be adopted as a Supplementary Planning Document (SPD) to the adopted AAP.

108. The Hatcham and Ilderton Roads Design Code includes Codes on sustainability, nature, movement, public open space, identity and character, land uses and homes.



Images 28 and 29 (above left and right): Excerpts from the Hatcham and Ilderton Roads Design Code setting out principles of land uses and built form across the study area, showing the application site edged in red.

Conclusion on policy designations, including response to the site allocations

109. The overarching thrust of policies within the Development Plan is to optimise and make effective use of land. The site is a long-standing and conspicuous gap in the urban fabric of the borough and presents a clear opportunity for optimisation.
110. The principle of redeveloping the application site for a housing-led development, providing a mix of conventional Class C3 dwellings and PBCL accommodation alongside flexible Class E/F (retail/service/dining/community) premises, is acceptable as it would bring into productive use this underutilised inner London site. The proposed mix and quantum of uses would support the role, functions and ambitions of the Opportunity Area and meet the expectations of the two site allocations, NSP70 of the Southwark Plan 2022 and OKR 16 of the draft AAP.
111. The acceptability of each of the individual uses is considered below.

Housing

Policy background

112. The London Plan sets the borough a target of providing 23,550 net new home completions over the next ten years. The targets 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. In order to help meet this target –while also ensuring social and other infrastructure is delivered to create mixed and inclusive communities as well as employment opportunities– London Plan Policy SD1 promotes mixed use development in opportunity areas, whereby functions such as retail and community are provided alongside housing.
113. Policy H1 of the London Plan seeks to optimise the potential for housing delivery on all suitable and available brownfield sites, especially on sites with existing or planned public transport access levels of 3-6 or which are located within 800 metres of a station or town centre boundary.
114. At the local level, the Southwark Plan and draft OKR AAP reiterate the targets established by the London Plan. Policy ST1 ‘Development targets’ of the Southwark Plan states that the Council “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)”. Of the 40,035 homes, the Plan aims for 11,000 to be new council homes. In seeking to play its role in the delivery of these borough targets, the draft OKR AAP sets out the phased delivery of 20,000 homes by the year 2038.
115. The regeneration of the application site for housing-led development is promoted by the site allocations in the Southwark Plan and the draft AAP. Both NSP 70 and OKR 16 identify the allocation area’s capacity as being 2,200 homes.

Assessment

Principle of housing

116. By delivering 605 PBCL studios and 120 conventional residential units, this planning application would contribute to realising the housing aspirations for the Opportunity Area, in line with London Plan Policy SD1, while also increasing London’s housing supply, in accordance London Plan Policy H1.
117. The 725 proposed housing units are lent further support by the Southwark Plan and the draft AAP, which promote residential use on the application site in the quantum proposed. The proposed housing would create a mixed community in a well-connected inner London location, the accessibility rating of which is likely to rise significantly in the near future.

118. Having regard to all of the above, the provision of residential floorspace, in a mix of conventional Class C3 units and PBCL studios, is acceptable in principle. This is subject to the Class C3 dwellings and PBCL studios meeting the relevant policies concerned with unit sizes, quality of accommodation, management arrangements and standards of amenity; it is also subject to a compliant tenure mix being delivered across the development as a whole. These matters are discussed in later sections of this report

Contribution towards borough housing targets

119. Through its assessment of the deliverable housing sites in the borough, the Council can demonstrate a five year supply of housing land, plus the necessary 20% buffer required by the housing delivery test. As the application site forms part of an identified 'allocation' in the Southwark Plan, its redevelopment for housing has been anticipated by the borough-wide assessment of deliverable housing sites. The borough-wide assessment attributed an indicative capacity of 312 new homes to the site; this was based on the number of homes proposed by the extant permission, 18/AP/2947. The proposed development would, therefore, make its contribution towards meeting the Council's housing targets.
120. It is also important to note that the PBCL would reduce pressure on the local private rented market, in that it would release back to the private rented sector hundreds of single dwellings that would otherwise be in occupation.
121. With regard specifically to affordable housing, there is a pressing need at the local level, with over 11,300 people on the borough's Housing Association waiting list as of December 2022. The 65 proposed social rent units would in particular help ease this pressure, delivering quality low-cost accommodation for Southwark residents, while also assisting the Council in its aim to provide 11,000 new council homes by 2043 as part of the overall target of 40,035.

Old Kent Road Housing Delivery Plan

122. 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 across the area covered by the draft 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.
123. As part of the collaborative process outlined above, and as per AV.13 'Old Kent Road Area Vision' of the draft AAP, a Housing Delivery Plan has been introduced. This comprises two consecutive phases, Phase 1 and Phase 2, each with their own housing number limit. For Phase 1, the cap is 9,500 net additional homes. Any scheme granted permission after the cap has been met

would fall into Phase 2, and be subject to a Grampian agreement linked to BLE delivery. Phase 2 schemes will only be eligible for implementation once a BLE construction contract is in place. In respect of the OKR Housing Delivery Plan only (i.e. not in respect of strategic housing targets), the Local Planning Authority and TfL have agreed that a 3:1 conversion rate can be applied in respect of PBCL schemes, where three PBCL units equate to one conventional (Class C3) dwelling.

124. The 79-161 Ilderton Road site benefits from an extant planning permission for 312 dwellings. Planning application 23/AP/0387 puts forward an alternative form of development for the site, which —applying the 3:1 conversion rate agreed with TfL— would deliver the equivalent of 322 dwellings. This is calculated as follows:
- one third of the 605 PBCL units (which, rounded, is 202); plus
 - the 120 conventional homes.
125. This represents an uplift of 10 homes on the extant planning permission
126. In the event of a resolution to grant permission for the 23/AP/0387 proposal, the Section 106 Agreement will incorporate a ‘surrender’ covenant requiring the owner to ‘give up’ the right to develop under the existing planning permission.
127. In the wider context of extant planning permissions and live planning applications across the Old Kent Road Opportunity Area, the pipeline of homes currently stands at the equivalent of 9,510 dwellings, marginally exceeding the Phase 1 cap. If planning permission is granted for the new 79-161 Ilderton Road proposal and the 18/AP/2497 consent is simultaneously surrendered, this would bring the total number of homes within Phase 1 to the equivalent of 9,520 dwellings. This is summarised by the table below:

Delivery of Old Kent Road Housing Delivery Plan: Summary table	
Phase 1 schemes by status	No. of homes
Extant planning permissions incorporating residential use(s)	8,046
Planning applications incorporating residential use(s) that benefit from a resolution to grant planning permission, but are pending completion of a legal agreement [^]	359
Planning applications incorporating residential use(s) without a resolution to grant as yet *	793
The 23/AP/0387 planning application	322
Total of all Phase 1 schemes	9,520
Surplus/shortfall relative to the 9,500-home cap	Surplus of 20

* These applications are 19/AP/6395 (294 St James’s Road), 20/AP/3822 (95 Haymerle Road), 21/AP/4757 (Ilderton Wharf) and 22/AP/1603 (18-22 Penarth Street), proposing 15, 40, 163 and 141 homes respectively.

** These applications are 23/AP/0582 (Daisy Business Park) and 23/AP/1862 (Devonshire Place), proposing 252 and 541 homes respectively.*

128. The Local Planning Authority is currently in a number of pre-application discussions about reducing or removing altogether the housing component from some extant Phase 1 planning permissions. It is also possible that extant permissions for housing will lapse, which would reduce the total number of homes in Phase 1, potentially releasing extra capacity beneath the 9,500 home ceiling. With this in mind, and given that the proposal hereunder consideration would result in a breach of the 9,500 home cap by a very small number, on balance the Opportunity Area would not experience any undue infrastructural burden as a consequence of the 20-home breach. As such, 23/AP/0387 will be treated as a Phase 1 development and will not be subject to the Grampian agreement.
129. The inclusion of the surrender clause in the Section 106 Agreement will give clarity and certainty to the housing pipeline within the Old Kent Road area, enabling the Local Planning Authority to make optimum use of any headroom beneath the 9,500 home ceiling that may be released by developers seeking alternative uses on sites where housing has been consented previously.

Conclusion on the provision of housing

130. With residential uses being supported on this site at all policy levels, in land use terms the proposed housing is acceptable. It would make a major contribution to meeting the Mayoral and local-level housing delivery targets, slightly exceeding the indicative capacity of 312 homes as forecasted by the Southwark Plan, thereby providing a small amount of windfall housing. Furthermore, bringing forward the development within Phase 1 of the Old Kent Road Housing Delivery Plan would not result in any undue infrastructural burden in advance of the Bakerloo Line Extension.

Purpose Built Co-Living (PBCL)

Housing typology background

131. This planning application proposes 605 PBCL units within the North Building, equipped with internal and external amenity spaces for the occupiers.
132. PBCL provides a rental option for single person households who cannot or choose not to live in self-contained homes or HMOs. PBCL units are not restricted to particular groups by occupation or specific need such as students, nurses or people requiring temporary or emergency accommodation. Much of the demand for PBCL comes from graduates and young professionals starting out in their career. PBCL is classified as non self-contained accommodation and a 'sui generis' use in the Use Classes Order. It is considered as 'housing' for monitoring purposes through the Council's and GLA's monitoring reports.

Policy background

133. Policy H16 of the London Plan recognises the need for PBCL developments within London, and acknowledges the contribution this typology can make to alleviating housing strain and raising standards across the rented sector in terms of the quality of accommodation and the security of tenancy. The policy makes clear that PBCL schemes must contribute to affordable housing; however, because this form of accommodation does not meet minimum housing space standards it is not considered suitable as a form of affordable housing itself.
134. All PBCL schemes are subject to the Viability Tested Route; however, developments that provide a contribution equal to 35% of the units at a discount of 50% of the market rent are not subject to a late-stage viability review.
135. Aside from viability considerations, Policy H16 also sets out strategic and detailed design requirements for PBCL. The policy provides a set of ten criteria that PBCL proposals must meet, encompassing themes of:
- locational suitability;
 - contribution to the social make-up of the neighbourhood;
 - design quality and occupier facilities;
 - management; and
 - contribution towards conventional (Class C3) affordable housing.
136. At the local level, Southwark Plan Policy P6 requires developments incorporating PBCL to deliver, as a first priority, at least 35% of conventional affordable housing (calculated by habitable room) on site. Policy P6 is structured in recognition of the acute need for more family and affordable housing within the borough, as explained in the policy's supporting notes:
- “Allowing too much purpose built shared living accommodation will restrict our ability to deliver more family and affordable housing. By requiring an element of affordable housing or contribution towards affordable housing from purpose built shared living accommodation we can make sure we work towards meeting the strategic need for this accommodation and our local need for affordable homes including affordable family homes”.*
137. Although Policy P6 states “All purpose-built shared living schemes will require a viability appraisal to be submitted”, in circumstances where conventional (Class C3) on-site affordable housing is being provided alongside the PBCL, and the conventional affordable housing is offered at a level that meets or exceeds the Council's Fast Track threshold, the requirement for a FVA falls away as per Policy P1 (sub section 4) of the Southwark Plan. The Mayor's draft Affordable Housing LPG, for which consultation closed in July 2023, has been updated to include provision that PBCL schemes may now provide their affordable housing contribution on site and follow the Fast Track Route, where meeting the relevant threshold.

138. Where conventional (Class C3) affordable housing cannot be provided on site, a cash payment towards the delivery of new council homes will be required. The value of any contributions will be based on the cost of meeting an on-site affordable housing requirement and should provide no financial benefit to the applicant.
139. The consequence of the local-level policy requirements as summarised above is that, in circumstances where a mix of PBCL and conventional housing is proposed, two pathways are available to the applicant depending on the level of affordable housing the proposal will provide. The two pathways are:
- a) the Viability Tested Route: this pathway must be followed where the level of affordable housing provided within the development would not meet the Council's Fast Track threshold; or
 - b) the Fast Track Route: applicants are eligible for this pathway where 40% or more of the total proposed housing would be:
 - on-site conventional (Class C3) affordable housing in a policy compliant tenure mix without subsidy; or
 - a cash in lieu equivalent of on-site conventional (Class C3) affordable housing in a policy compliant tenure mix without subsidy; or
 - some on-site conventional (Class C3) affordable housing in a policy compliant tenure mix without subsidy, supplemented by a cash in lieu contribution sufficient to raise the effective level of affordable housing to at least 40%.
140. Policy P6 does not set out any strategic and detailed design requirements for PBCL accommodation, nor does any other policy within the Southwark Plan.

Assessment

141. The following paragraphs of this report assess the proposed development against the ten considerations set out under Policy P16 of the London Plan. The matter of affordable housing provision, and the associated viability considerations, is dealt with in a later part of this report.

Criterion 1: Is the PBCL of good quality and design?

142. The North Building, which would house the PBCL premises, would achieve a high quality of architectural design, as discussed in detail in a subsequent part of this report entitled 'Design quality'.

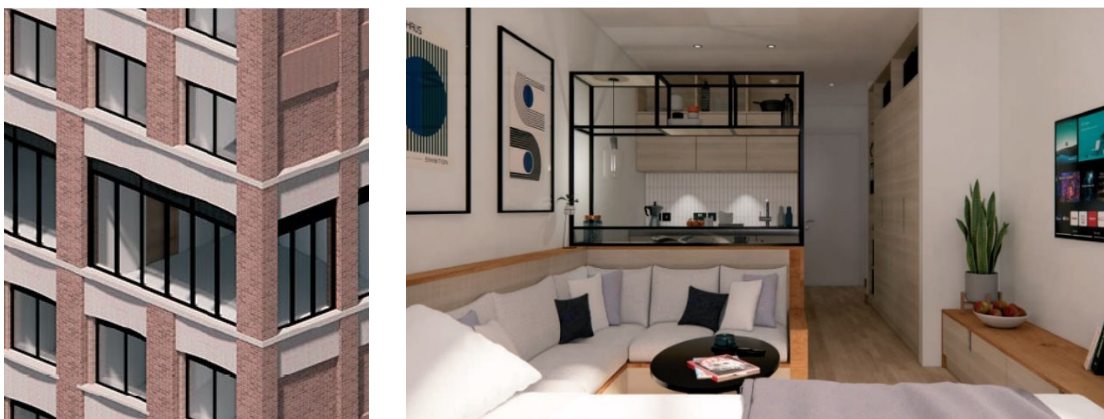


Image 30 (above left): Rendered view of the North Building's carefully-modelled façade comprising red brick piers either side of bays headed by concave masonry lintels. **Image 31** (above right): Visual of a non wheelchair accessible studio.

143. The PBCL accommodation would consist of acceptably-sized and well-equipped en-suite private studios. The quality of the PBCL accommodation can be distinguished from Houses in Multiple Occupation (HMOs) by the range of high-quality managed communal amenity spaces that accompany the private studios; at the 79-161 Ilderton Road site, these proposed communal spaces would include a cinema, multiple outdoor terraces and generous co-working spaces.
144. The Mayor has published a draft guidance document, the 'Large-scale Purpose-built Shared Living LPG', which sets out detailed design standards PBCL developments should strive to achieve. A later part of this report provides a detailed assessment of the PBCL accommodation against the criteria set out in the draft LPG, but in summary it is considered to be of an exemplary quality, thereby meeting Criterion 1 of Policy P16.

Criterion 2: Does the PBCL contribute towards mixed and inclusive neighbourhoods?

145. The planning application is supported by a Social and Economic Impact Assessment, which anticipates that the proposed PBCL and conventional (Class C3) affordable housing will attract a diverse range of individuals and families to this 'tenure-imperceptible' development.
146. To help integrate these households of differing sizes and from across a range of incomes to integrate, a number of on-site shared facilities are proposed. The community cafe would provide a dedicated space where the local community can eat, drink, socialise and work together. The pocket park, located in-between the PBCL premises and the conventional housing, would provide similar opportunities. Both the pocket park and the café would be accessible by members of the general public, further helping to embed the occupiers of the PBCL and affordable conventional homes into the neighbourhood. Other on-site facilities include commercial spaces that could potentially be operated as retail and/or dining outlets; these would provide further opportunities for the PBCL and conventional housing residents to mix.

147. The PBCL element of the proposed development would be the second of its kind within the Old Kent Road Opportunity Area, should the recently-consented 281-unit scheme at 18-22 Penarth Street be built out. There is a low representation of PBCL schemes within the wider area, and a number of conventional private and affordable housing schemes are under construction or recently completed in Ilderton Road, such as 62 Hatcham Road (100% affordable), 180 Ilderton Road (100% affordable) and Leathams Ilderton Road (40% affordable). Therefore, even in the event that both PBCL schemes were implemented, it is not considered that together they would negatively impact the neighbourhood in terms of the mix of uses and inclusivity.
148. The Southwark Licensed Houses in Multiple Occupation (HMO) Register indicates that there are 795 registered HMOs within the SE15 postcode and a further 660 HMOs within SE16 to the north, which demonstrates a significant need in the area for single occupancy accommodation. It is therefore considered that this development, being a new form of rented accommodation, would be able to provide a significant number of single occupant homes in the area at a more affordable rate for single income earners.
149. For the reasons given above, the proposed land use is considered to be in conformity with Criterion 1 of London Plan Policy H16.

Criterion 3: Is the site in a well-connected location?

150. The site currently has a low PTAL of 1b to 3. In spite of this rating, it does benefit from a range of easily-accessible transport options. For example, the South Bermondsey Overground Station is located a few minutes' walk to the north, and regular bus services are available from Ilderton Road directly to the front of the site.
151. As part of the Surrey Canal Triangle redevelopment (a large regeneration scheme at New Bermondsey in the neighbouring borough of Lewisham), it is intended to build a new London Overground station; the station entrance would be approximately 350 metres to the east of the site. Additionally, the extension of the Bakerloo Line from Elephant and Castle to New Cross would improve underground links into central London and to Lewisham. Taking these future infrastructure enhancement projects into account, the site's public transport accessibility is projected to rise to PTAL 4.
152. Criterion 3 of Policy H16 also requires that, through design, PBCL development does not contribute to car dependency. The PBCL proposed at 79-161 Ilderton Road would be car free (with the exception of 6 accessible blue badge spaces for both the PBCL and affordable housing uses) ensuring there would be no contribution to car dependency. The proposed development includes the provision of safe and secure cycle parking to encourage the use of sustainable modes of transport. The site's location will enable cyclists to take advantage of the proposed CFR 12 route that, once delivered, will run along southern section of Ilderton Road.

153. For the reasons given above, it is considered that the proposed land use would not contribute towards car dependency, and is thus in conformity with Criterion 3 of London Plan Policy H16.

Criterion 4: Is the PBCL under single management?

154. An Operational Management Plan has been submitted with the application setting out how Fifth State and CRM would, in partnership, provide day-to-day management and long term operation of the PBCL premises. The partnership would operate under the Fifth State brand. As such, the proposal complies with Criterion 4 of London Plan Policy H16.

Criterion 5: Are all units for rent with minimum tenancy lengths of at least three months?

155. The tenancy lengths for the shared living development will be a minimum of 3 months. This will be secured in the S106 Agreement. This satisfies Criterion 4 of London Plan Policy H16.

Criterion 6: Are the communal facilities and services sufficient and of good quality?

156. Criterion 6 of Policy H16 sets out six sub-criteria that PBCL proposals must satisfy if the needs of the intended number of residents are to be met. These sub-criteria relate to the quality and extent of communal facilities (kitchens, other internal recreational areas, external amenity spaces, and laundry/drying facilities) as well as the services residents would benefit from, such as concierge services and bedding/linen changing.
157. Below is a table providing an overview of the functions, quantum and locations of the communal facilities within the PBCL premises proposed by this planning application:

Communal facilities within the PBCL premises: Summary table		
Internal		
Floor	Facility	Size (sq. m)
Level 00	Residents' reception and lobby	248
	Recording studio	35
	Residents meeting suite	50
Level 01	Shared kitchen	310
	"Social Hub" Dining/lounge area	235
	Agile working area	310
	Games/breakout space	155
	Cinema	70
Level 02	Kitchen/living room	81
Level 03	Kitchen/living room	81
Level 04	Kitchen/living room	81

Level 05	Shared kitchen	366
	Agile working	198
	Gym/well being studio	198
Level 17	Shared kitchen	198
Level 17	Games/lounge space	102
Level 26	Shared kitchen	198
	Games/lounge space	102
Total:		<u>3018</u>
Average per PBCL studio:		<u>5</u>
Multiple	Back-of-house space including: toilets, laundry facilities, storage, parcel store, reception/office etc.	297
External		
Floor	Facility	Size (sq. m)
Level 05	North amenity terrace	132.0
	Central amenity terrace	328.5
Level 17	Sky garden	92.6
Level 26	Sky garden	92.6
Total:		<u>645.7</u>
Average per PBCL studio:		<u>1.1</u>

158. The total quantum of useable internal communal amenity space, which equates to 5 square metres per resident, is considered to be a good offer. A diverse range of spaces would be provided, all accompanied by appropriate equipment, furniture and services. With respect to the external spaces, the range in sizes and locations is welcomed, as is the average quantum per resident, which is slightly more than the 1.0 square metre promoted by the Mayor.
159. The applicant has confirmed that residents would not incur additional fees for usage for any of the internal amenity spaces included in the calculation above. All-inclusive usage of for residents will be secured in the Section 106 Agreement.
160. A later part of this report entitled 'Quality of residential accommodation – PBCL' provides a detailed assessment of the PBCL communal amenity spaces against each of the sub-criteria under Criterion 6 of Policy H16. It also assesses the scheme against relevant design quality considerations in the Southwark Plan and the Mayor's draft 'Large-scale Purpose-built Shared Living LPG'. It concludes that the communal facilities would be of a high quality. As such, it is considered that Criterion 6 of Policy H16 has been satisfied.

Criterion 7: Are the individual studios adequately sized and laid out, and future-proofed against self-containment?

161. The proposed PBCL studios would not comply with the legal definition of a dwelling in that they would not individually contain all of the facilities required for

day-to-day domestic living and, as such, are incapable of being used as self-contained homes. They are clearly designed as part of a wider community with reliance of the shared amenity facilities, with a view to creating an integrated community. In this regard, the proposed studios constitute a Sui Generis use.

162. A detailed appraisal of the size and layout of the individual studios, including an assessment against the criteria set out in the Mayor's draft LPG, is provided in a later part of this report entitled 'Quality of residential accommodation – PBCL'. The detailed appraisal concludes that the units would be of an acceptable size and logical layout, and as such it is considered that Criterion 7 of Policy H16 has been met.

Criterion 8: Is the PBCL supported by a management plan?

163. As mentioned previously in this section of the report, the PBCL premises will be managed by a partnership between Fifth State and CRM. An Operational Management Plan has been submitted with the application setting out how the partnership will provide for the day-to-day management of the PBCL accommodation and ensure the long-term quality of the development in a way that supports the community. Further detail about the provisions within the Operational Management Plan is given in a later part of this report entitled 'Amenity impacts on nearby residential occupiers and the surrounding area'.

Criterion 9: Has a cash in lieu contribution towards conventional C3 affordable housing been secured?

164. Alongside the PBCL premises, the proposed development would incorporate 120 conventional Class C3 housing units. All 120 of the units would be affordable, in a policy-compliant tenure mix. This conventional housing amounts to 40.9% (by habitable room) of the total housing on the site.
165. Given the provision of a quantum of affordable conventional housing on-site that meets the Fast Track thresholds of both the Mayor and the Council, thus exempting the proposal from an application-stage viability review, a cash in lieu payment is not required. The Section 106 Agreement will secure an Early Stage Review in the event that implementation fails to occur within two years of planning approval.
166. This matter is discussed in detail in a later part of this report entitled 'Development viability'.

Conclusion on PBCL

167. The proposed PBCL would comply with the ten criteria of London Plan Policy H16, providing a suitably-located premises of high quality design, with the accommodation to be under single management and all tenancies to be at least three months in duration. As detailed in a later part of this report entitled 'Quality of Accommodation – PBCL', the individual units and communal spaces have been well designed in terms of spatial arrangement, internal environmental conditions and level of amenity, in accordance with the criteria of Policy H16 as

well as the relevant parts of the Southwark Plan. As a level of on-site affordable housing would be delivered that exceeds the Fast Track threshold, the proposed PBCL does not trigger a payment-in-lieu.

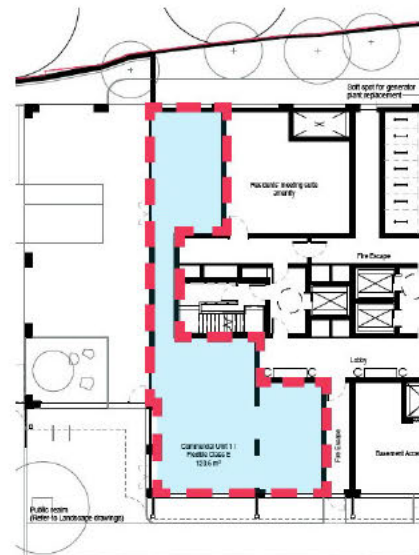
Employment/business use

168. This planning application proposes three units in office and light industrial use. Details are provided below:

Office and light industry units: Summary table			
Unit name and location	Floor(s)	Sought use classes	(GIA sq. m)
Unit 1 (North Building)	Level 00	Class E [g]	126
Unit 5 (South Building)	Level 00	Class E [g]	144
Unit 6 (South Building)	Levels 00-01	Class E [g]	190
Total of all proposed:			460
Total office / light industry floorspace as a percentage of all employment floorspace:			48.6%
Comparison with extant permission			
Quantum of office / light industrial floorspace compared to the extant planning permission (18/AP/2497)			- 1357 sq.m



Image 32 (above): View of the North Building, as seen from Ilderton Road looking northwards, with Unit 1 edged in red.



Unit 33 (above): Cropped view of the ground floor plan, showing Unit 1 edged in red.

Policy background

169. Promoting the economy and creating employment opportunities is a key priority for the planning system. Owing to the site's location within an opportunity area,

a relevant consideration is London Plan Policy SD1 (discussed in earlier parts of this report), which provides support for developments that create employment opportunities. London Plan Policy GG5 requires local planning authorities to plan for sufficient employment and industrial spaces to support economic growth. Policies E1 and E2 deal specifically with the provision of business floorspace (Class E[g] use, formerly Class B use), with a focus on securing good quality, flexible and adaptable office space at varying sizes in the CAZ and town centres; however, these two policies also recognise that business space in non-prime locations can play a valuable role in providing low-cost alternatives for SMEs and start-ups. London Plan Policy E11 requires development proposals to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases.

170. At the borough level, a strategic target of the Southwark Plan is to build a strong, green and inclusive economy. To achieve this, Policy SP4 aims to bring forward at least 460,000 square metres of new office space between 2019 and 2036 (equating to around 35,500 jobs), of which 90,000 square metres should be located outside the CAZ. The policy goes on to say this 90,000 square metres of employment use should include industrial, distribution, hybrid and studio workspace. It also sets a strategic target of 10,000 new jobs for the Old Kent Road Opportunity Area. Policy SP4 also expects 10% all new employment floorspace to be affordable workspace for start-ups and small and independent businesses.
171. Policy P30 of the Southwark Plan identifies sites within the CAZ, opportunity areas and town centres as appropriate for accommodating the significant growth needed to meet business demand. This policy requires development proposals at the very least to maintain, but where possible increase, existing levels of business floor space. Applications proposing employment floorspace should be supported by a marketing strategy to demonstrate how the facilities would meet current market demand. In opportunity areas, Policy P30 states that proposals should help contribute to mixed use neighbourhoods by incorporating new types of flexible business workspace accommodating manufacturing, technology, science, creative and cultural industries and the digital economy.
172. Policy E2 of the London Plan requires large-scale development proposals to incorporate flexible workspace suitable for micro, small and medium sized enterprises. Policy E3 deals specifically with affordable workspace. The policy states "In defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose". The policy identifies the circumstances in which it would be appropriate to secure affordable space. Part B of the policy specifically identifies the CAZ as an important location for securing low cost space for micro, small and medium sized enterprises.
173. Policy P31 of the Southwark Plan deals with affordable workspace. Criterion 2 of the policy requires major development proposals to deliver at least 10% of the gross new employment floorspace as affordable workspace on site at a discounted market rent for a period of at least 30 years. The policy recognises that there are many different forms that such space could take depending on the

site location, characteristics, the nature of local demand and existing/proposed uses.

Assessment

174. Owing to the site currently being open land in Sui Generis lawful use but containing no floorspace, and on the basis of the policy requirements outlined above, there is no prescribed quantum of employment use that the site must deliver. In addition the draft OKR AAP indicates that the ground floor of this site could be used for residential use. There is, therefore, no objection in principle to bringing forward 460 square metres of new high-quality and fit-for-purpose facilities for office and/or light industrial use. Smaller business space to meet the needs of the creative industries would also align with the objectives of London Plan Policy HC5.
175. Policy P31 of the Southwark Plan states that employment uses (Class E[g]) “will be secured and where necessary, retained through the implementation of conditions and/or planning obligations in accordance with the tests set out in national policy”. Therefore, it is considered necessary to apply a condition to 23/AP/0387 to this effect. The condition will ensure the units dedicated as affordable workspace (discussed in more detail below) remain in Class E[g] use for the entirety of the affordable workspace lifetime. It will also prevent the market rate unit, Unit 1, from undergoing a change of use to one of the other Class E sub-categories without express planning permission having first been granted by the Local Planning Authority.
176. The applicant has supplied a brief marketing strategy to demonstrate that there is demand for the proposed office space, in accordance with the requirements of Southwark Plan Policy P30. The strategy sets out that the predicted lack of supply of Grade A space being delivered in the short-term will ensure that the proposed development will provide attractive high quality business floorspace in an inner London location. It anticipates that there will be a large variety of occupiers wanting to upgrade from current secondary stock, and that these occupiers will be attracted to the area given its Opportunity Area location, with South Bermondsey Station nearby.
177. While the extant permission –and the larger quantum of employment floorspace it incorporated– is a material consideration in the determination of this planning application, the proposed scheme is considered to provide employment-generating use in a more holistic format that is better-suited to the target occupier.

Job creation

178. The previous lorry park use provided a low level of employment at five full time equivalent (FTE) jobs in total. The proposed 460 square metres of floorspace would support between 10 and 44 FTE positions, depending on the particular type of employment for which the units are ultimately used. The provision of up to 44 FTE positions, representing an uplift of up to 39 on the site’s former yield,

would satisfy the aims of the London Plan and the Southwark Plan in creating new jobs within the Opportunity Area.

Business relocation and retention

179. The site was previously occupied by RS Joyner and Son for the storage of lorries and vans. RS Joyner and Son relocated to another site in Dartford, at the end of March 2018 leaving the site vacant. Therefore, there are no businesses that require relocation.

Affordable workspace

180. The total quantum of proposed employment-generating floorspace within the development is 946 square metres GIA. Under the terms of Policy P30, 10% of this should be dedicated as 'affordable workspace'. Set out below is a schedule of the applicant's proposed affordable workspace offer:

Affordable workspace: Summary table		
Unit reference and description	Floor(s)	(GIA sq. m)
Unit 5 (South Building)	Level 00	144.0
Unit 6 (South Building)	Levels 00-01	190.0
Total of all proposed affordable workspace Class E [g]		334.0
Total affordable workspace as a percentage of the total proposed non-residential floorspace		<u>35.3%</u>
Comparison with extant permission		
Quantum of affordable workspace compared to the quantum secured in the extant planning permission (18/AP/2497)		+ 62 sq.m

181. The extant permission (18/AP/2497) included 449 square metres GIA of retail floorspace and 1,817 square metres GIA of office floorspace. 12% of the total commercial floorspace was secured as affordable workspace, equating to 272 square metres GIA.
182. As the above table shows, the quantum of affordable workspace proposed by 23/AP/0387 exceeds the spatial requirements of Policy P30 with an offer equating to 35.3% of the total employment floorspace provision. The applicant has consciously provided this amount of affordable workspace to ensure no net loss in comparison with the quantum secured in the extant planning permission. Hence, although the total quantum of office and light industrial floorspace has decreased when contrasted with the consented scheme, the quantum of affordable workspace has increased.
183. To ensure flexibility and to appeal to a wide range of prospective tenants, the proposed affordable workspace is configured as two separate units, located at

different levels of the development, with one accessed from Zampa Road and one fronting onto Ilderton Road.



Image 34 (above): View of the South Building, as seen from Ilderton Road, with Units 5 and 6 edged in red.

184. The Section 106 Agreement will include a dedicated ‘affordable workspace’ schedule. This will ensure, among other things, that:
- the workspace is provided for a 30-year period at a peppercorn rent for months 0-11, and then from 12 months until the end of the affordable workspace lifetime at no more than £15/sq.ft;
 - the capped rental rate of £15/sq.ft will be inclusive of service charges;
 - no more than 50% of the market rate commercial floorspace can be occupied until the affordable workspace has been fitted-out to the agreed specification ready for occupation; and
 - a Full Management Plan and a Full Marketing Strategy, both to be secured in advance of the marketing period and first operation of the workspace.
185. For the reasons given above, the proposed affordable workspace offer is policy compliant.

Flexible commercial (retail/service/dining/office and community) use

186. This planning application proposes two units in a flexible commercial use and one in flexible commercial/community use. Details are provided below.

Flexible commercial and community units: Summary table		
Unit name and location	Sought use classes	(GIA sq. m)
Unit 2 (North Building)	Class E[c] and Class F2[b]	123
Unit 3 (South Building)	Class E[a] through E[g]	200
Unit 4 (South Building)	Class E[a] through E[g]	163

	Total	486
Total commercial/community floorspace as a percentage of the total proposed non-residential floorspace		51.4%
Comparison with extant permission		
Quantum of commercial/community floorspace compared to the extant planning permission (18/AP/2497)		+ 37 sq.m

187. Class F2[b] use relates specifically to halls or meeting places for the principal use of the local community. Class E comprises various sub-categories, as listed below, encompassing a wide range of uses:

- [a] conventional retail;
- [b] dining (excluding pubs and bars);
- [c] financial and professional services;
- [d] indoor sport, recreation or fitness (e.g. gym);
- [e] medical or health services;
- [f] crèche, day nursery or day centre;
- [g] office or light industrial process capable of being carried out in any residential area without detriment to amenity.

188. An earlier part of this report has set out in detail why office and light industrial uses are acceptable, both in terms of the site location and as part of a development containing the mix of uses proposed. Therefore, there is no need to re-consider the potential use of Units 3 and 4 for such purposes. Therefore, the following 'Policy background' and 'Assessment' paragraphs of this report focus on the acceptability of the units only for the other uses being sought (i.e. retail, service, dining and, in the case of Unit 2, community).

Policy background

189. In opportunity areas, London Plan Policy SD1 places focus on the need to support development that creates employment and provides the necessary social and other infrastructure to sustain growth and create mixed and inclusive communities. Although it seeks to limit retail and local services to town centres only, the policy does recognise that retail may be appropriate in non town centre locations under-served by local convenience shopping and related services, and where those new facilities would serve existing and/or new residential communities

190. London Plan Policy SD7 states that, when considering development proposals, boroughs should take a 'town centres first' approach, discouraging out-of-centre development of main town centre uses and, where out-of-centre commercial uses are proposed, considering the impact they may have on the vitality and viability of town centres.

191. At the local level, Policy P38 of the Southwark Plan is concerned with shops outside protected shopping frontages, town and local centres. Although it expects retail uses to be provided in the town centres, it does recognise that

shops and other local services outside of these designated areas can provide a convenient service to help make people feel part of a community and do their shopping with minimal travel. The Southwark Plan provides support for uses with active frontages that promote activity and successfully engage with the public realm in appropriate locations.

192. Southwark Plan Policy P35 requires any proposed retail uses in opportunity areas to be conditioned so as to restrict change of use within Class E. Retail uses are defined as those falling within Classes E[a], E[b] and E[c] – which encompasses shops, post offices, cafés, restaurants, banks, building societies, professional services, estate agents and employment agencies. Uses such as indoor sport and recreation, crèche/nursery and offices fall outside the E[a], E[b] and E[c] classifications.
193. Both the Southwark Plan and draft AAP allocations within which the 79-161 Ilderton Road site is located state that redevelopment “may” provide retail uses.
194. With regard specifically to community uses, both London Plan Policy S1 and Southwark Plan Policy 46 support the delivery of new high-quality facilities provided they are available for and accessible to all members of the community. Furthermore, both the Southwark Plan and draft AAP allocations state that redevelopment of the application site “may” deliver community uses.

Assessment

195. The three proposed commercial units would bring productive economic uses to the site that would support the resident and working populations. The uses would successfully integrate and co-exist with the PBCL and conventional housing units on the floors above.
196. Being part of the Opportunity Area, the application site is in a location undergoing large-scale change, the result of which is that the local resident population will rise substantially in the coming years. Furthermore, the site is situated very close to South Bermondsey Station, the Millwall Football Club and a potential new overground station (New Bermondsey) on Surrey Canal Road. For these reasons, there is likely to be a rise in footfall along Ilderton Road as well as an increased local demand for retail, dining, office, professional and financial services.
197. The total amount of floorspace that could potentially be used for retail purposes would be under the 1,000 square metre threshold set by Policy P36 for triggering an impact assessment. In any event, it is not considered that the introduction of retail uses in this location would harm the vitality and viability of any nearby town centre, being sufficiently distant from the three closest centres: Old Kent Road High Street would be 700 metres away, the Blue 700 metres away and Canada Water 750 metres away. By virtue of the units’ size, they would only be capable of providing convenience retailing rather than large-scale retailing, the type of which would be better placed on the Old Kent Road. Such convenience retailing would usefully serve the local catchment in a part of the Opportunity Area where at present there is a very limited number of retail outlets.

198. The following paragraphs address the policy considerations raised by the specific use proposed for each of the three units.

Unit 2

199. The applicant is committed to delivering a bespoke 'Community Investment Programme' (CIP) as part of the proposed development. The CIP will focus on fostering local partnerships, providing employment, training and supply chain opportunities, and delivering inclusive community events derived from community needs.
200. As part of the delivering the CIP, Unit 2 will be dedicated as a not-for-profit community café. The applicant's vision is that, alongside performing its principal day-to-day function of serving food and drink to paying customers, the not-for-profit café would become a social and community hub, proposing that "furniture could be cleared or rearranged to enable community activities such as meetings, exhibitions, performances, and pop-up markets".



Image 35 (above): *Visualisation of the interior of the proposed Community Café.*

201. On the occasion that a community event is expected to be attended by numbers exceeding the capacity of the not-for-profit café, the applicant has offered to facilitate such 'one-off' events in the PBCL Residents' Amenity Space. This commitment will be secured in the Section 106 Agreement.
202. The applicant, Fifth State, intends to operate the café under their brand. Notwithstanding, a fall-back mechanism will be included in the Section 106 Agreement ensuring that, in the event of Fifth State becoming unable to perform this function at a future point in time, responsibilities are transferred to a Not-for-Profit Organisation (NPO) through a lease agreement. This will include clauses requiring the cafe to be run on a truly not-for-profit basis with meaningful opportunities for community use on a regular free-of-charge basis.

203. The applicant will be bound, through the Section 106 Agreement, to fit out the community cafe to a Category A standard, to include a preparation kitchen and two toilets. A Category A fit-out includes flooring, wall coverings and suspended ceilings, electrical distribution, small-power sockets, fire detection systems etc.
204. The proposed use of Unit 2 as a not-for-profit community café, in a mixed Class E[c] and Class F2[b] use, is considered acceptable and should be treated as a benefit of the scheme. It would align with the aspirations of OKR 16 and NSP 70, and in providing high-quality and accessible facilities for all, it would be supported by London Plan Policy S1 and Southwark Plan Policy 46

Units 3 and 4

205. As part of pre-application engagement carried out with the community, the applicant identified a local appetite for a convenience store and gym in this part of the Old Kent Road Opportunity Area.
206. In light of this community feedback, and although this planning application seeks full flexibility of use for both units, the applicant's aspiration is for Unit 3 to be operated as a convenience store and Unit 4 to be operated as a gym. Accordingly, the applicant has committed to marketing Unit 3 to retailers only, and Unit 4 to leisure operators only, until the completion date of the units. If by the date of completion no operators have been found for one or both units, marketing would be broadened out to include all other Class C3 sub-categories. This commitment is welcomed, and will be secured in the Section 106 Agreement.



Image 36 (above): View of the South Building, as seen looking south along Ilderton Road, with Units 3 and 4 edged in red.

207. Although Policy P35 requires proposed retail uses in opportunity areas to be conditioned to prevent changes of use within Class E, it would be unreasonable in this instance to restrict the use of the units to the Class E[a], E[b] and E[c] classifications. This is because there is no express requirement within policy for redevelopment of the 79-161 Ilderton Road site to provide retail; the draft AAP simply supports retail uses, and the Southwark Plan says that redevelopment “may” provide such uses. Therefore, the applicant is under no obligation to propose any retail/service/dining uses, and has suggested the units could be

tenanted for such purposes only in recognition of the keenness expressed by the community to see a café and/or convenience store delivered on the site.

208. As the extant permission—which included 1,817 square metres of office floorspace—is a material consideration in the determination of 23/AP/0387, it is necessary to consider the lesser quantum the new proposal would deliver. While it must be acknowledged that the provision would not deliver the same employment-generating potential as the consented scheme, the 23/AP/0387 proposal would deliver a quantum more in-keeping with the site's location outside of a town or local centre. The intentional configuration of the spaces to attract the type of operator the existing local community wants, with a commitment to market the units to appeal to such operators, is also positive. This will optimise the units' sustainability from a viability and operational perspective.
209. For all of the reasons given above, the proposed delivery of 374 square metres of flexible commercial space alongside a 124 square metre not-for-profit community cafe on this site is considered acceptable.

Takeaway, betting shop, pay day loan and pawnbroker uses

210. As explained in an earlier part of this report, the site is in the Hot Food Takeaway Exclusion Zone. For the avoidance of doubt in case of any future changes to the Use Class Order and/or prior notification routes, a planning obligation is recommended precluding the occupation of any of the three units for hot food preparation purposes. This is in the interests of environmental protection and visual amenity.
211. For the avoidance of doubt in case of any future changes to the Use Class Order and/or prior notification routes, a planning obligation is recommended precluding change of use of any of the three commercial units to a betting shop, pawnbroker or pay day loan shop. This would be in the spirit of Southwark Plan Policy P40, which does not permit betting shops, pawnbrokers and pay day loan shops in locations outside protected shopping frontages. This is in the interests of promoting healthy lifestyles and reducing societal inequalities.

Job creation

212. The proposed 486 square metres of floorspace would support between 8 and 50 FTE positions, depending on the particular type of commercial use the units are ultimately used. The provision of up to 50 FTE positions would satisfy the aims of the London Plan and the Southwark Plan in creating new jobs within the Opportunity Area.

Conclusion on uses

213. The proposed land uses are appropriate in policy terms for this site within the Old Kent Road Opportunity Area. The introduction of PBCL and conventional housing is considered to be a major benefit of the scheme, facilitating housing delivery benefits including a significant contribution towards affordable housing in the form of 65 social rent units and 55 intermediate units.

214. The proposals for flexible commercial Class E floorspace would revitalise a vacant site that currently fails to activate Ilderton Road, while also contributing to the vibrancy and economy of the Opportunity Area. Although out-of-centre commercial uses are generally discouraged by the London and Southwark Plans, the inclusion of relatively small-scale commercial and community uses is broadly consistent with the wider site allocation in the Southwark Plan and would contribute towards meeting the general aspirations for the Old Kent Road area, as set out in the draft AAP. Moreover, it is not anticipated that the commercial units would harm the vitality and/or viability of the nearest town centres. The proposed use of Unit 2 as a not-for-profit community café with opportunities for free-of-charge hire by local groups is welcomed, and should be considered a benefit of the scheme.

Affordable housing and development viability

215. The proposed development takes a hybrid approach whereby the PBCL units, all of which would be market rent tenure, would be delivered alongside conventional on-site affordable housing. A total of 120 conventional dwellings are proposed, of which 55 would be in intermediate tenures and 65 in social rent.

Policy background

216. 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 rent 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 rent housing to meet the needs of homeless households living in unsuitable temporary accommodation such as bed and breakfasts or overcrowded conditions.
217. 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.
218. Policy H4 requires development to deliver the maximum reasonable amount of affordable housing, with the Mayor setting a strategic target of 50%. The Policy promotes the delivery of those affordable homes on-site, with a cash in lieu contribution permitted only in exceptional circumstances. Policy H4 details the quantum of affordable housing proposals must provide in order to qualify for the "Fast Track" route, whereby a detailed viability assessment will not be required at planning application stage but the permission will be subject to review mechanisms if development is not commenced within two years. For the 79-161 Ilderton Road site, a minimum of 35% would be required, assuming the delivery of the housing is not facilitated by any public subsidy.

219. At the local level, the Southwark Plan also includes a Fast Track route, albeit setting a higher bar to pass than the Mayor. It states that a detailed interrogation of viability will be waived only where a development provides 40% affordable housing in a policy compliant tenure mix (i.e. a minimum of 25% social rent and a minimum of 10% intermediate housing), with no grant subsidy. The 40% Fast Track threshold is calculated on a habitable room basis.

Assessment

220. As already explained in the 'Principle of the proposed development in terms of land use' section of this report, PBCL developments must contribute to affordable housing. However, because PBCL is a non self-contained housing product that does not meet dwelling space standards, the contribution it makes to affordable housing must be in the form of:
- on-site conventional (Class C3) affordable housing; or
 - a payment in-lieu towards off-site conventional (Class C3) affordable housing; or
 - a combination of the two.
221. Where PBCL uses are proposed, an approach to the Fast Track Route threshold calculation must be taken that is equitable with a fully conventional housing scheme. The metric employed must account for PBCL studios being larger than an average habitable room. The risk of doing otherwise is that, because the PBCL forms the 'market sale' component of the housing offer, the role it plays as a proportion of the total on-site housing could be under-represented, potentially resulting in a failure to secure the maximum viable contribution to affordable housing.
222. The Council accepts a methodology of treating each PBCL unit as one habitable room subject to the wider PBCL premises providing adequate communal facilities and none of the communal facilities contributing to the habitable room count.
223. The table below summarises the composition of the proposal using the 'habitable room' approach accepted by the Council:

Housing composition by habitable room: Summary table					
Land use	Sub-type	Total no. hab rooms (/hab room equivalent)		As % of total hab rooms	
Conventional housing (Class C3)	Social rent dwellings	280	418	27.4%	<u>40.9%</u>
	Shared ownership dwellings	138		13.5%	
PBCL (Sui Generis)	Studios	605		<u>59.1%</u>	
	Ancillary facilities	Treated as zero		N/A	

Total:	1,023	100%
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224. For this privately-owned site not benefitting from public subsidy, the affordable housing offer meets both the Fast Track Threshold of 40%, thus negating the need for any interrogation of viability. In accordance with the requirements of London Plan Policy H5 and Southwark Plan Policy P1, the Section 106 Agreement will incorporate: an implementation-dependent Early Stage Review; clauses to ensure delivery of the conventional housing in advance of the PBCL; and provisions around the qualifying criteria for the affordable housing products. With these secured, the proposal is considered to be compliant with all affordable housing policies at local and London levels.

Tenure mix

Policy background

225. Policy H6 of the London Plan 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.

226. Policy P1 of the Southwark Plan sets a requirement for a minimum of 25% of all the housing to be provided as social rent and a minimum of 10% intermediate housing to be provided. As a proportion of all the affordable habitable rooms in the development, this equates to 71% social rent equivalent tenures and 29% intermediate tenures. Policy P1 requires any rooms that are over 28 square metres to be counted as two habitable rooms for the purposes of calculating affordable housing. This accounts for large open-plan living spaces that include kitchens and dining areas.

227. As discussed in an earlier part of this report, the PBCL element of the proposal is entirely market sale and would cross-subsidise the delivery of the affordable housing component of the proposed development. The PBCL contains 605 of the 1,023 habitable rooms in the development. Applying the tenure split requirements of Southwark Plan Policy P1, of the remaining 418 habitable rooms:

- at least 256 should be in social rent tenure (i.e. 25% of 1,023);
- at least 103 should be in an intermediate tenure (i.e. 10% of 1,023); and
- the other 59 habitable rooms can be either social rent or intermediate.

Assessment

228. The below table summarises the split of social rent and intermediate tenures, by habitable room numbers, across the 120 proposed conventional (Class C3) dwellings:

Distribution of habitable rooms across affordable tenures			
Unit size	Social rent	Intermediate	Total
Studio	0	6 (4.4% of all SO)	6 (1.4%)
1-bed	8 (2.9% of all SR)	50 (36.2% of all SO)	58 (13.9%)
2-bed	60 (21.4% of all SR)	72 (52.2% of all SO)	132 (31.6%)
3-bed	170 (60.7% of all SR)	10 (7.2% of all SO)	180 (43.1%)
4-bed	42 (15.0% of all SR)	0	42 (10.0%)
All units	<u>280</u> (67.0% of all a/h) (27.4% of all hr)	<u>138</u> (33.0% of all a/h) (13.5% of all hr)	<u>418</u> (100%)

229. As the above table demonstrates, the tenure mix of the proposed conventional housing would be policy compliant, exceeding the minimum proportions of social rent and intermediate housing required by both the London Plan and Southwark Plan.

Dwelling size mix

Policy background

230. With regard to dwelling size mix, the principles set out by London Plan Policy H10 are made locally specific by Southwark Plan Policy P2. The latter states that major residential developments must provide a minimum of 60% of residential units with two or more bedrooms, and that within the OKR Action Area Core 20% of residential units must have three or more bedrooms. The policy also states that studios (i.e. dwellings for occupancy by one person, which do not have a sleeping area segregated from the rest of the living accommodation) should not constitute any more than 5% of the total housing, and that studios should only be provided in open market tenure. Dwelling mix compliance is assessed on the basis of dwelling numbers, not habitable rooms.

Assessment

231. The below table summarises the split of sizes/occupancies across the 120 proposed conventional (Class C3) dwellings:

Distribution of dwelling sizes/occupancies across affordable tenures			
Unit size	Social rent	Intermediate	Total
Studio	0	4 (7.3% of all SO)	4 (3.3%)
1-bed	4 (6.1% of all SR)	25 (45.5% of all SO)	29 (24.2%)

2-bed	20 (30.8% of all SR)	24 (43.6% of all SO)	44 (36.7%)
3-bed	34 (52.3% of all SR)	2 (3.6% of all SO)	36 (30.0%)
4-bed	7 (10.8% of all SR)	0	7 (5.8%)
All units	<u>65</u>	<u>55</u>	<u>120</u> (100%)

232. As the table shows, 72.5% of the units would have two or more bedrooms, and 25.8% of the units would contain three or more bedrooms. This meets the requirements of Policy P2. The provision of a substantial number of four-bedroom dwellings, all in social rent tenure, should be seen as a positive attribute of the scheme. This effort to more closely tailor the range of unit sizes to specific local affordable housing demand responds positively to Part A.1 of London Plan Policy H10, and as such is welcomed.
233. It is recognised that a small number of the proposed homes would be in a studio format, contrary to the expectations of Southwark Plan Policy P2. The four studios were incorporated into the scheme mid-way through the planning application process in response to officers' concerns around the quality of accommodation and level of amenity achieved by the original layouts. In support of the newly-introduced studios, the applicant has provided a letter from Metropolitan Thames Valley Housing Association, the probable Registered Provider of the conventional housing element of the development, stating that they do not foresee any issues with demand for these four Shared Ownership homes. Therefore, in spite of the four dwellings being technically non-compliant with Policy P2, this aspect of the proposal is considered acceptable on balance.

Quality of residential accommodation – PBCL

Policy background

234. As mentioned in an earlier part of this report, Policy H16 of the London Plan sets out various criteria that PBCL must meet in order to achieve policy compliance, This includes Criterion 6, under which there are six sub-criteria relating to standard of accommodation. The earlier part of this report summarised that the quality of accommodation would be exemplary, referring readers to this 'Quality of residential accommodation' section for the full detailed assessment.
235. To supplement and expand on the quality of accommodation requirements set out under Criterion 6 of Policy H16, the Mayor has produced a draft LPG setting out quantitative and qualitative design standards in relation to PBCL. Public consultation was undertaken on the draft in 2022, but it has yet to be formally adopted. Bringing together the standards from Policy H16 with those in the draft LPG, there are eight key matters against which to assess the communal facilities within the proposed accommodation. These are:
- Would there be convenient access to communal kitchens?
 - Would internal communal amenity space (dining rooms, lounges etc.) be provided?

- Would sufficient laundry and drying facilities be provided?
 - Would workspace be provided?
 - Would there be toilets and storage in the communal areas?
 - Would the premises be served by a concierge?
 - Would outside communal amenity space be provided?
236. The quality of the accommodation also depends on its management, which is another matter covered in detail in the draft LPG. It sets out that the management plan must cover the following:
- security and fire safety procedures;
 - maintenance of all internal and external communal areas;
 - provision of bedding/linen changing and room cleaning services;
 - move-in and move-out arrangements;
 - servicing and delivery arrangements;
 - details of the tenant contract strategy; and
 - details of the management, including transferral arrangement in the event of future management changes.
237. A final consideration is the quality of the individual studios. Aside from some general requirements relating to the fit-out and square meterage, the draft LPG states that studios should achieve the qualitative standards of Policy D6 of the London Plan, specifically those listed in parts B to E. The Southwark Plan does not prescribe any minimum standards with respect to the quality of PBCL accommodation. Taking together the draft LPG and the applicable parts of London Plan Policy D6, the individual PBCL studios should meet quality criteria relating to:
- spatial arrangement (e.g. practical layouts and a floor to ceiling height of at least 2.5 metres);
 - environmental comfort (e.g. maximised natural ventilation and overheating avoidance);
 - outlook, sense of openness and privacy;
 - daylight and sunlight; and
 - wheelchair units.
238. The following paragraphs provide a full assessment of the communal facilities, the management plan and the individual units.

Assessment of communal facilities

Would there be convenient access to communal kitchens?

239. Communal cooking facilities would be provided at levels 01, 02, 03, 04, 05, 17 (Block B) and 26 (Block A) of the PBCL premises. These kitchens would be available to all residents, irrespective of the floor or block their studio is located in.

240. For those studios located on levels without communal kitchen facilities, which includes a small proportion of the wheelchair accessible studios, access would be possible via one of the six proposed residents' lift. The waiting-plus-travelling time for those living on the floor farthest from a communal kitchen (Level 15 of Block A) would not exceed 86 seconds.

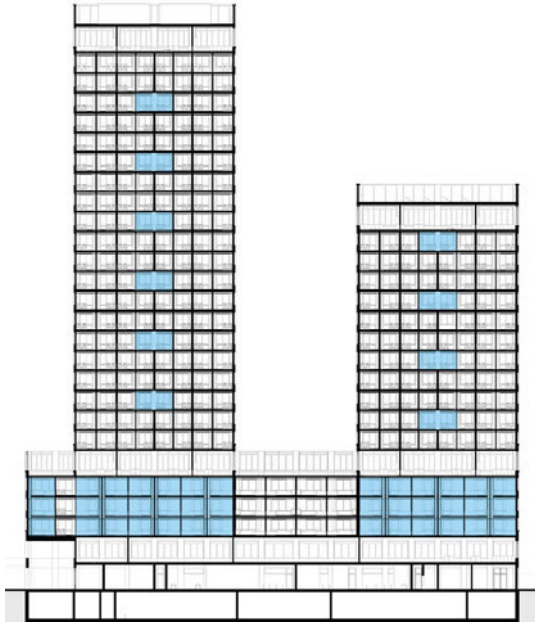


Image 37 (above): Distribution of wheelchair units, highlighted in blue, across Blocks A and B.

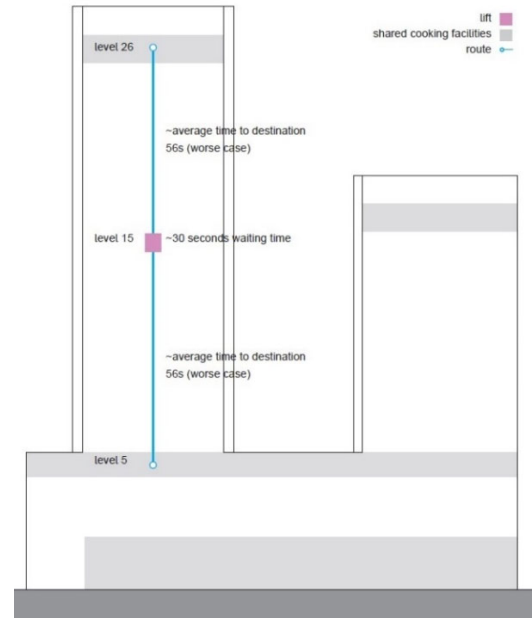


Image 38 (above): Maximum travel time from the storey of accommodation farthest from a communal kitchen.

241. Another consideration in terms of 'convenience' is the level to which the kitchens are equipped with food preparation appliances relative to the number of residents. In the case of the proposed PBCL, all of the communal cooking facilities would meet the desirable criteria set out in the Mayor's LPG, namely:

- a minimum of 5 cooking stations per kitchen;
- a minimum of 0.6 square metres per resident;
- a sink / draining board for every 5 residents;
- at least one fridge with freezer in every kitchen and one for every 10 residents;
- at least one dishwasher in every kitchen and one for every 20 residents;
- at least one refuse space (to include recycling capability) in every kitchen and one for every 20 residents;
- at least one microwave in every kitchen and one per 20 residents; and
- one unit for food and utensil storage per resident.



Image 39 (above): Example of the interface of the booking system app.

242. This level of provision would allow 20% of the 605 residents to cook individually at any one time using the communal cooking facilities. Residents would be informed of the live availability of shared cooking and dining facilities through Fifth State’s booking system app. This would help avoid wait times and any issues with elevator congestion that may disincentivise residents from using these facilities.
243. For the reasons given above, and having regard to the appropriateness of this site for tall buildings with compact and efficient floorplates (which makes providing communal kitchens on every floor, as promoted by the draft LPG, very difficult), it is considered that the proposal would provide convenient access for all residents to communal cooking facilities.

Would internal communal amenity space (dining rooms, lounges etc.) be provided?

244. Each of the communal kitchens would include dining tables each capable of seating no fewer than eight people, allowing residents to cook, eat and converse in the same space. On Level 01 of the building, two kitchen/dining rooms would be located either side of a central residents’ lounge, which itself would include dining areas, thereby giving those who wish to eat separately from the food preparation area the option to do so. On Level 05, residents would be able to take the food they have prepared outside onto the podium-level terraces (discussed in more detail below) to dine. Furthermore, private rooms would be bookable via the Fifth State app, allowing residents to host dinner parties and/or share a large meal at home. In summary, the PBCL would provide residents with a wide range of dining spaces.

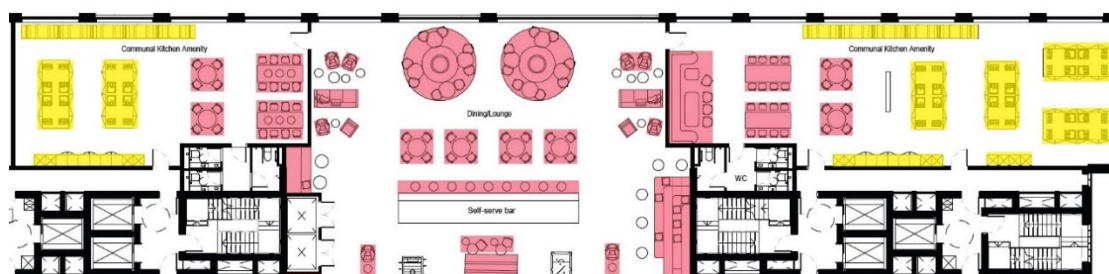


Image 40 (above): The Level 01 floorplan, showing the two food preparation areas (in yellow) and the availability of dining areas (in red) within the kitchens themselves as well as within the central residents’ lounge.

245. In addition to dining areas, the proposal would incorporate a number of communal lounge spaces and games rooms; these would provide residents with recreation and relaxation opportunities away from their private studio. Some of the lounge and games rooms would be located on the uppermost storeys of Blocks A and B, opening onto the “sky gardens” and providing impressive spaces for socialising and entertaining. Other facilities would include a recording studio, residents’ meeting suite, cinema, and a gym and wellbeing centre.



Images 41 (above left) and **42** (above right): Precedent images supplied by the applicant, giving an impression of the 'look and feel' of the kitchen and dining space in the PBCL.

246. The LPG also places importance on recreational spaces being designed to optimise flexibility. Eight rooms within the proposed PBCL would be capable of being booked-out. The rooms are to be fitted with free standing furniture and adequate plug sockets, enabling day-time use for meetings or group work, before returning to general recreational use later in the day. Subject to demand and take up, some of the quiet facilities could be repurposed as prayer rooms depending on the resident make-up of the development, which is in accordance with the recommendations of the LPG.
247. Throughout the building, incidental seating would also be provided to create an environment in which visitors can comfortably linger and impromptu interactions can occur between residents. This is in line with the recommendations of the LPG.
248. In total, excluding all dedicated communal kitchens (including any associated dining areas), the floor area given over to recreational spaces would be in excess of 1,900 square metres, which is considered to be a generous offer on a per-resident basis (3.14 square metres per resident).

Would sufficient laundry and drying facilities be provided?

249. The communal residents' laundrette at Level 01 would provide 40 washer/dryers along with lockable drying racks. A further 10 laundry rooms would be distributed between levels 07 and 23 of the building, each equipped with secure airing racks and approximately 6 washer/dryers.
250. The LPG advises that 1 washer and dryer should be provided for every 10 residents; the proposed development would provide the equivalent of 1 per every 3.8 residents, thus exceeding the target. To enable ease of use of these facilities, residents would be able to book slots via the Fifth State management app.

Would workspace be provided?

251. Over 500 square metres of co-working space is proposed, all equipped with AV facilities, high speed broadband and height-adjustable desks. The co-working space would be for the exclusive use of PBCL residents with charges on top of the residents' monthly rental fee.

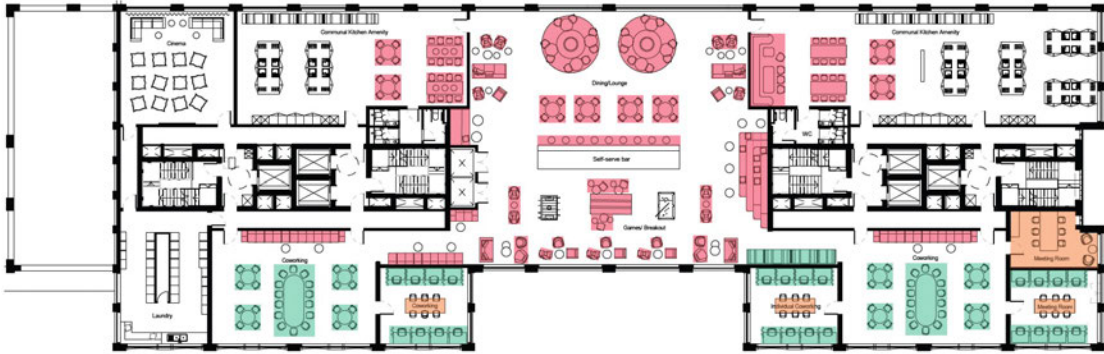


Image 43 (above): Floorplan of Level 01 of the proposed PBCL, with co-working areas highlighted in green and AV-equipped workspaces highlighted in orange.

Would there be toilets and storage in the communal areas?

252. Convenient toilet facilities would be provided alongside other communal facilities for use by residents' guests. These WC clusters would be located at Levels 01 and 05, directly off the communal recreational areas. In all cases, the WC clusters would contain at least one wheelchair user cubicle alongside standard cubicles.
253. In addition to communal toilets, the draft LPG expects PBCL developments to incorporate additional storage areas in the form of lockers or cupboards for each resident to store personal belongings, such as travel bags and bulky items. A 'back of house' room at basement level has been set-aside for this purpose. At 85 square metres GIA, it would be of a sufficient size to meet the additional storage needs of the 605 residents.

Would the premises be served by a concierge?

254. A concierge would assist in the management of the building. During daytime hours, this service would operate from the reception desk in the PBCL lobby.

Would outside communal amenity space be provided?

255. The proposal would feature four outside communal amenity spaces for exclusive use by the PBCL residents. These would be distributed up the profile of the building, with two at Levels 05, one at Level 17 (Block B) and one at Level 26 (Block A). The latter two gardens would be located on the rooftops, affording impressive views across the city, and would incorporate their own outdoor kitchen and dining spaces where residents can cook together. The gardens at Level 05 would be multifunctional spaces, providing dining, work and yoga opportunities.



Image 44 (above): Layout of Level 05, showing the two podium-level gardens, which would together provide 460.5 square metres of outdoor amenity space for the PBCL occupiers.

256. In total, the four gardens would comprise 645.7 square metres of external amenity, equating to 1.1 square metres per resident. Exceeding 1.0 square metre 'per resident' provision advised by the LPG, this quantum is considered to be adequate.

Summary

257. The proposed communal facilities would be inclusive, well designed, adequately sized, conveniently accessed, and sufficient to meet the requirements of the intended number of residents. They would provide a range of lively and quiet environments, offering opportunities for solo use while also helping develop a sense of community. This is all in accordance with the aims of the draft LPG.

Assessment of management arrangements

258. With the exception of move-in/move-out arrangements and deliveries/servicing (which are discussed in the 'Transport and Highways' section of this report), the following paragraphs assess the Operational Management Plan for compliance with the draft LPG requirements.

Security and fire safety procedures

259. With regard to security procedures, the Operational Management Plan includes commitments to 24-hour on-site security at the property, comprehensive CCTV coverage, and electronic access control lock systems and swipe card entry points throughout.
260. The Fire Safety Statement submitted in support of the application details the safeguarding of external and internal communal spaces and safety measures for private units and communal spaces. In accordance with the requirements of the draft LPG, It confirms that:

- all electrical products, such as white goods, that are built into the PBCL will be PAC tested.
- residents will be encouraged to have their personal electrical items PAC tested; and
- Personal Emergency Evacuation Plans (PEEPS) will be prepared for all residents whose ability to self-evacuate may be compromised, taking into account any General Data Protection Regulations (GDPR) and the Data Protection Act (2018).

Maintenance of all internal and external communal areas

261. The Operational Management Plan commits to regular maintenance and cleaning of the internal communal spaces across the week. A specific commitment is made to maintain the communal kitchens on a daily basis. Management and cleaning procedures will ensure cooking facilities can be made available for faith-based groups, allergies, and dietary preferences (such as vegetarian, vegan, kosher or halal cooking) to limit cross-contamination risks.
262. The Plan also sets out the frequency with which disposables (e.g. washing-up liquid and kitchen roll in the kitchens, toilet roll in the WCs) would be replenished.
263. With regard to external communal areas these will be kept clean and tidy, safe and free from hazards by the General Manager and cleaning staff.

Provision of bedding/linen changing and room cleaning services

264. The Operational Management Plan confirms that bedding and linen would be supplied to new residents on occupation. A studio cleaning service would be provided bi-weekly on a rotational basis to assist all members in the general upkeep of their private space. Ad hoc at-cost room cleaning services are to be available to residents, bookable via the Fifth State app.

Details of the tenant contract strategy

265. The monthly fee charged to the PBCL residents would be all-inclusive, encompassing all of the internal and external amenity spaces, including facilities and services, as confirmed by the applicant in email liaison with the GLA. This meets the requirements of the LPG, which expects all services and facilities to be included in the rent, except utility bills for individual studios.

Details of the management, including transferral arrangements in the event of future management changes

266. The Operational Management Plan states that, in the event of any future changes to management, Fifth State and CRM will use all reasonable endeavours to minimise disruption to residents, maintaining “close communication with the incoming operator to ensure they are fully informed

about all aspects of the scheme". This recognition of the need to minimise impacts on residents is welcomed.

267. All other aspects of the PBCL management have been detailed in the preceding paragraphs, and are considered to be acceptable.

Summary

268. The Operational Management Plan outlines adequately how tenants would be provided with a good level service on a day-to-day basis as part of their 'all inclusive' monthly rent. It also provides the necessary assurances in respect of the current and long-term management of the PBCL, as well as fire safety and security arrangements. This is all in accordance with the aims of the draft LPG.

Assessment of individual studios

Spatial arrangement

269. Each PBCL studio would be fully furnished with an en-suite shower room. There are seven different studio typologies, provided in the composition set out below:

PBCL individual studios: Summary table				
Unit type	GIA (sq.m)	Wheelchair accessible?	Total number (as %)	Total number (as %)
Type A1	20.3	No	251 (41.5%)	544 (89.9%)
Type A2	18.5	No	18 (3.0%)	
Type A3	22.0	No	275 (45.5%)	
Type WA1	27.2	Yes	6 (1.0%)	61 (10.1%)
Type WA2	28.0	Yes	10 (1.7%)	
Type WA3	28.0	Yes	42 (6.9%)	
Type WA4	28.0	Yes	3 (0.5%)	
Total			<u>605</u>	

270. The draft LPG states that, with the exception of wheelchair accessible units, studios should be no smaller than 18 square metres and no larger than 27 square metres to avoid being converted to substandard self-contained units. Types A1, A2 and A3 would all fall within this floorspace range, and as such are acceptably-sized.

271. Taking the smallest of the studio typologies, the following accommodation would be provided:

- 4-foot double bed with storage underneath;
- A compact kitchenette including a fridge and hob with in-built extract and ventilation system;

- wardrobe space (typically in excess of 1.0 metre width);
- approximately 3 square metres of storage space;
- a seating area for eating and working;
- an area to relax, comprising soft seating located centrally in the room;
- wall and cupboard storage; and
- an en-suite shower room.



Images 45, 46 and 47 (clockwise from top left): Annotated axonometric, aerial view and visualisation of a Type A1 studio, showing the general layout as well as the typical quality of furnishings and fittings.

272. The other studio typologies would offer the same extent of furniture and fittings, but in many cases to a more generous level.
273. The detailed floorplans for each studio typology demonstrate that the furniture would be accommodated in a way that would not make the homes cramped or impractical for use. Fifth State have agreed to offer furniture choice to residents so that they can personalise/customise key elements of the space to encourage feelings of ownership. This includes paintings, plants and greenery.

274. All PBCL studios would achieve 2.5 metre floor-to-ceiling heights throughout the lounge, kitchen, sleeping area and en-suite shower room, which would help guard against a cramped or claustrophobic living environment.
275. In summary, it is considered that the studios would be appropriately sized and thoughtfully laid-out.

Environmental comfort

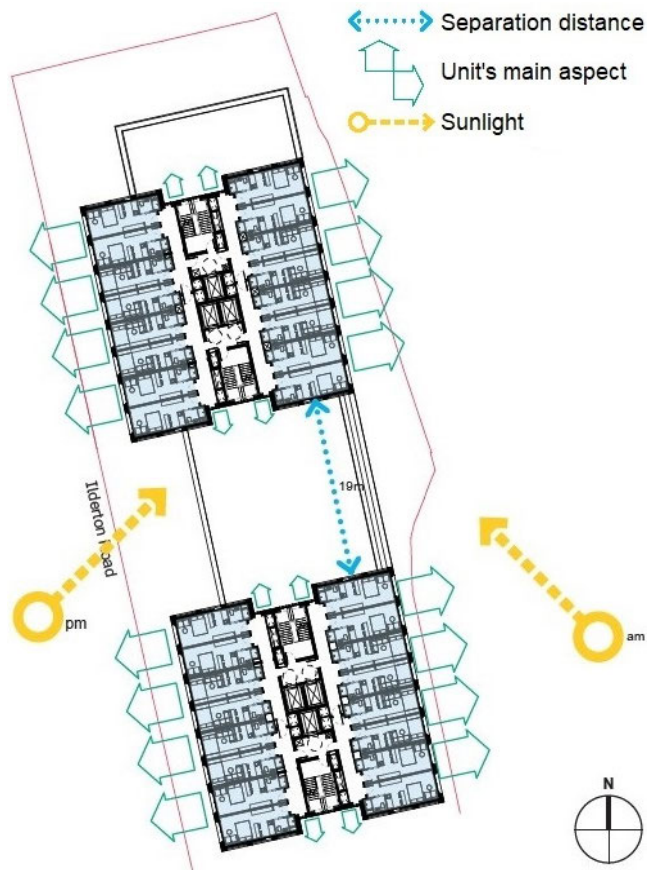
276. Each PBCL studio would incorporate at least one window with an openable pane, with the glazing size and specification optimised to maximise natural daylight within the units. The openable pane would allow for a degree of manually-controlled passive ventilation and thermal control. Comfort cooling would be available in the studios to complement the natural ventilation.
277. A Noise and Vibration Impact Assessment accompanies the application, which outlines the façade and ventilation strategy. The background noise in this location is such that in the predicted worst case conditions (i.e. when noise emanating from Ilderton Road is at its highest), residents would need to close their windows to maintain an internal noise environment that does not exceed the target levels set out in Building Standards. At less noisy times of the day residents would be able to open their windows without their internal environment target noise levels being exceeded. Through proposed mitigation measures, such as suitably specified glazing and attenuated ventilators, the report predicts no significant adverse impacts in relation to noise or vibration levels.
278. The Environmental Protection Team are satisfied that an acceptable level of amenity would be secured for the PBCL occupiers. A subsequent section of this report entitled 'Energy and Sustainability' deals in more detail with the environmental strategy for the accommodation.

Outlook, sense of openness and privacy

279. Outlook, sense of openness and privacy are all very important considerations for PBCL proposals. This is because —unlike conventional housing which provides occupiers with multiple rooms and a variety of outlook— PBCL residents are likely to spend the majority of their time in their studios, notwithstanding that PBCL premises include communal spaces. Given this, separation distances and depth of view from PBCL studios are important.

280. The typical floorplate would be arranged symmetrically, with a central service zone including the vertical circulation. This configuration allows for almost all of the 605 units to have an east or west aspect. The only exceptions to this would be three north-facing single aspect units within Block A. However, the location of these three units on the lower levels of the building means the occupiers would benefit from convenient access to the Level 01 and Level 05 communal facilities. On balance, the proximity of these facilities is considered to be acceptable mitigation.

Image 48 (right): Layout of one of the upper floors of the North Building, showing the aspect each studio would achieve.



281. The closest neighbouring property to any of the proposed PBCL studios is Mehmet's Tyre Shop at 59 Ilderton Road, which adjoins the application site to the north. The windowless south flank of the Tyre Shop would be 7.7 metres away from the closest studio. However, the modest one-and-a-half storey height of this neighbouring building means the PBCL occupiers would benefit from views 'over' the Tyre Shop rather than towards the flank wall, thereby achieving a reasonable quality of outlook. It is also material consideration that the extant planning permission, 18/AP/2497, incorporated residential units facing towards Mehmet's Tyre Shop at a similar proximity. The quality of outlook from all other PBCL studios would be good.

282. Due to the separation distances and mitigating factors for the units in greatest proximity to neighbouring buildings, in the current day context all proposed studios would benefit from good levels of privacy.

Daylight

283. A daylight and sunlight report based on the Building Research Establishment (BRE) Guidance has been submitted by the applicant, which considers light to the proposed dwellings using the recently introduced Climate Based Daylight Modelling (CBDM) methodology. The CBDM methodology is based on target illuminances from daylight over half the area of the room (measured on a reference plane at table-top level) for at least half of the daylight hours in a typical year. The recommendations are that the following median illuminances

should be achieved over 50% of the assessment grid for at least half of the daylight hours:

- 100 lux in bedrooms;
- 150 lux in living rooms; and
- 200 lux in kitchens.

284. Where a room has a shared use, the highest illuminance target should apply. As such, an illuminance of 200 lux should be targeted in all PBCL studios.
285. With respect to daylight, the applicant's report has tested a sample of 24 PBCL studios from across multiple floors. Of the 24 sampled rooms, 100% would comply with the BRE 2022 guidelines for daylight amenity.
286. Mid-way through the planning application process, and for completeness, the applicant was asked to supply the illuminance results of the lowest-performing studio of all 605. The applicant supplied this technical analysis, which showed that lowest-performing PBCL studio would achieve luminance levels of 378 lux. This is the northern single aspect unit (room ref: R6/1002) located on Level 02. The recorded performance far exceeds the BRE's recommended target value.
287. In summary, the analysis results show full compliance with the BRE's illuminance guidelines. It is therefore considered that the future occupants of the development would have access to very good levels of daylight.

Sunlight

288. In new buildings, the BRE 2022 guidelines recommend calculating the 'sunlight exposure' to assess whether a dwelling will appear reasonably sunlit. This test measures the hours of sunlight that could be received at the centre point of each window on 21st March.
289. In housing, the main requirement for sunlight is in living rooms. It is viewed as less important in kitchens and bedrooms.
290. The BRE does not give specific guidance for PBCL units, but as these provide living, kitchen and sleeping facilities it is reasonable to expect the studios to receive a total of at least 1.5 hours of sunlight on 21st March.
291. The 24-studio sample tested for internal daylight levels were also tested for sunlight exposure, and returned a 100% pass rate.
292. As with the internal daylight tests, the applicant was asked mid-way through the planning application process to supply the sunlight results for the lowest-performing studio. The applicant supplied this data, which as with the daylight analysis, showed the sole north-facing unit at Level 02 would perform the least well. Here, a sunlight exposure level of 0.3 would be achieved. As the unit is north facing, and given the very high levels of illuminance achieved, on balance the internal environment for the occupier would be acceptable.

293. In summary, the analysis results show an extremely high level of compliance, with the vast majority of rooms meeting the BRE's sunlight exposure guidelines. It is therefore considered that the future occupants of the PBCL premises would have access to adequate levels of sunlight.

Wheelchair studios

294. To meet the requirements of London Plan Policy D5 and ensure inclusive design, PBCL schemes should provide 10% of the studios to the M4(3) standards established by Approved Document M of the Building Regulations. Unlike with conventional housing, PBCL studios do not need to meet either of the sub-categories (i.e. M4(3)(2)(a) or M(4)(3)(2)b); however, the layouts should be broadly compliant with the 'accessible units' guidance given in the Mayor's draft LPG.
295. As summarised in the table above, the proposed development would provide 61 wheelchair accessible studios, equating to 10.1% of the total number. These studios would be distributed across various different floors of the development, and their configuration would conform with the guidance given in the draft LPG. With Section 106 obligations in place to secure the wheelchair user accommodation and marketing requirements, it is considered that the proposal complies with London Plan Policy D5.

Resident stay-cycle mitigation

296. Throughout the lifetime of the 605-unit PBCL premises, and in part because of the relatively short duration of the tenancies, there will be an ongoing turnover of residents, with viewings and move-ins taking place on a regular basis. To limit the impact on the experience of sitting residents, the Operational Management Plan commits to carrying out the majority of viewings online and off-site, utilising internal mapping, VR and video conferencing. Where physical viewings do occur, they will form part of organised and chaperoned building tours, scheduled to take account of any other events that may be occurring in the building. It is considered that these measures will minimise disturbance to the PBCL residents and uphold a consistent quality of living experience for them.

Conclusion on quality of PBCL accommodation

297. In conclusion, the proposal would achieve exemplary living accommodation for the PBCL residents. Well laid out and adequately-sized studios are proposed, alongside generous shared facilities equipped to meet the needs of the total number of residents. Good internal natural light and outlook would be achieved throughout. A robust framework Operational Management Plan has been submitted by the applicant, a finalised version of which is to be secured by way of a planning condition. In light of all of the above, the relevant policies of the London Plan and Southwark Plan have been met.

Quality of residential accommodation – Conventional housing

Policy background

298. Adopting a design-led approach, Policy D6 of the London Plan 2021 sets out the quantitative and qualitative requirements of new residential accommodation. Quantitative metrics include the minimum size of dwellings, rooms and outdoor spaces. Qualitatively, the policy seeks to maximise dual aspect and naturally-lit layouts, make tenures imperceptible from each other, and ensure robust maintenance and management strategies are in place.
299. Policy P15 of the Southwark Plan 2022 advises that planning permission will be granted provided the proposal achieves a high standard of residential accommodation. The full range of local-level standards for internal accommodation are set out in the Council's Residential Design Standards SPD.

Assessment

Tenure integration

300. London Plan Policy D6 requires housing developments to maximise tenure integration in the interests of achieving mixed communities. It states that all affordable housing units should have the same external appearance as private housing, and that all entrances should be indistinguishable from each other. Policy SP2 of the Southwark Plan 2022 echoes these objectives, requiring residential schemes to achieve equity of esteem from street level and avoid segregation of tenures.
301. Although the application proposes to group all 120 conventional residential units in the South Building, each tenure would be contained within its own block (the social rent in Block C, the shared ownership in Block D), each with its own independent entrance.

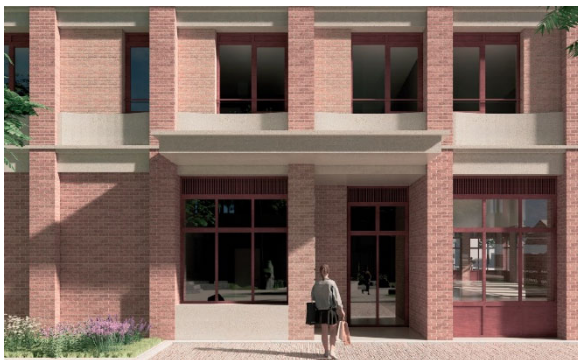


Image 49 (above): Entrance to the social rent block.



Image 50 (above): Entrance to the shared ownership block.

302. Despite the two tenures not being full integrated, the external appearance of Blocks C and D would be of a consistent standard, and the communal entrances would be indistinguishable from each other, thus ensuring imperceptibility of

tenure. In addition, the various outdoor communal and public landscaped spaces serving the two blocks would help to foster integration between residents irrespective of the tenure of their home. This would ensure equity of esteem from street level.

Dwelling sizes, room sizes and provision of built-in storage

303. The internal area of all of the proposed homes would satisfy the minimum floor areas set out in the Council's Residential Design Standards SPD. All 120 dwellings would be logical and efficient in their layout, with practically-shaped rooms and minimised circulation space. Additionally, compliant levels of built-in storage would be provided within the homes.



Image 51 (above): Layout of Level 04 of the South Building, showing the range of home sizes that would be provided and their layouts.

304. In summary, the dwelling, room and built-in storage sizes are considered acceptable.

Wheelchair dwellings

305. This planning application proposes 12 'wheelchair accessible' units compliant with M4(3), amounting to 10% of the total number of dwellings. These would be provided across both tenures, in a range of dwelling sizes, and on various floors of the two blocks. All other dwellings would be designed to achieve the M4(2) standard. The number and layout of wheelchair dwellings, and their distribution across the tenures, meets the policy requirements. With the wheelchair user accommodation and marketing requirements to be secured through the Section 106 Agreement, the proposed provision is acceptable.

Floor-to-ceiling height

306. All dwellings would have a floor-to-ceiling height of 2.7 metres. This exceeds the minimum requirements stipulated by London Plan Policy D6 and the

Council's Residential Design Standards SPD, which are 2.5 metres and 2.3 metres respectively. This would contribute to the sense of space within all the dwellings.

Aspect and outlook

307. Of the 120 dwellings proposed:

- x18 (15.0%) would be single aspect;
- x102 (85.0%) would be dual aspect, comprising:
 - x92 with windows on external walls wrapping around a corner (e.g. on a north elevation and on an east elevation)
 - x10 with windows on external walls opposite to each other (e.g. on a north elevation and on a south elevation)

308. Of the 18 single-aspect units, 15 would be in Block D (the intermediate block), with the remaining three in Block C (the social rent block). All the single-aspect units would be one-bedroomed, none would face within 90 degrees of due north, and the key habitable rooms for each of these flats would have generously proportioned windows to provide occupiers with a broad viewframe. Furthermore, the South Building's floorplate shape means windows would not be flanked by deeply projecting walls, thereby guarding against the occupiers experiencing a tunnelled outlook. Thus, despite the single direction of outward view from these dwellings, the floorplate configuration and orientation of the building means the occupiers would benefit from an acceptable quality of outlook.

309. In summary, the proposal would achieve a clear predominance of dual aspect, with all proposed dwellings benefitting from an acceptable quality of outlook. Although a small number would be single-aspect, none would be north-facing, and when balanced against the need to achieve an efficient use of land, it is considered that the new dwellings' quality of aspect and outlook would be in accordance with the policy framework.

Daylight

310. As discussed in an earlier part of this report, in new buildings the BRE 2022 guidelines recommend calculating 'illuminance' to determine whether a dwelling will appear reasonably daylight. The UK National Annex gives median illuminance recommendations of:

- 100 lux in bedrooms;
- 150 lux in living rooms; and
- 200 lux in kitchens.

311. Where a room has a shared use, the highest target (i.e. 200 lux) should apply. However, in the interests of discouraging applicants from designing small separate windowless kitchens, the CBDM methodology says that a degree of design flexibility can be applied in the case of a combined living/dining/kitchen area if the kitchens are not treated as habitable spaces.

312. The applicant undertook internal daylight testing of a selection of the habitable rooms across the proposed South Building. The sample size is 48 rooms. Of these, the results show 42 would meet the illuminance targets promoted by the BRE guidance, equating to a 88% compliance rate.
313. Mid-way through the planning application process, and for completeness, the applicant was asked to supply the lowest recorded illuminance result(s) within the South Building, The applicant duly supplied this: it showed that the lowest recorded illuminance was 81 lux, and that this would occur at two rooms. This underperformance is largely attributable to the rooms' northerly orientation, which renders them more challenged for daylight given the climatic intensive CBDM calculations – a northern orientation is often unavoidable in a scheme that seeks to maximise opportunity. While the rooms record shortfalls, it should be noted that the BRE Guidelines acknowledge that this room classification does not carry the same expectation for natural light, when compared to a living room. Moreover, both affected bedrooms are secondary bedrooms within flats containing other rooms that meet the BRE, so overall the occupiers would experience acceptable levels of internal daylight.
314. The technical analysis and calculations have taken into consideration the presence of balconies and it should therefore be acknowledged that there is a trade-off between private amenity and daylight amenity.

Sunlight

315. As discussed in an earlier part of this report, in new buildings the BRE 2022 guidelines recommend calculating 'sunlight exposure' to assess whether a dwelling will appear reasonably sunlit. This test measures the hours of sunlight that could be received at the centre point of each window on 21st March.
316. With regard to conventional (Class C3) homes specifically, the BRE recommends that:
- through site layout design, at least one main window wall should face within 90-degrees of due south;
 - a habitable room, preferably a main living room, should receive a total of at least 1.5 hours of sunlight on 21st March; and
 - where groups of dwellings are planned, site layout design should aim to maximise the number of dwellings that meet the above recommendations.
317. The applicant undertook internal sunlight testing of a sample of 23 rooms within the South Building. Three failed to meet the test, and the remaining 20 passed. In the case of the three non-compliant rooms, these all have a northerly orientation.
318. Mid-way through the planning application process, and for completeness, the applicant was asked to supply the lowest recorded sunlight exposure result(s) within the South Building, The applicant duly supplied this: the lowest figure

recorded was zero. This would occur at three rooms (R7/2001, R8/2001 and R9/2001), all of which are north-facing bedrooms.

319. Although the applicant has included the results for the north-facing windows as per a strict interpretation of the BRE guidelines, their performance should be regarded as less important than the performance of windows facing within 90 degrees of south. This is because a north facing window has the lowest potential to receive sunlight of all orientations, something which the BRE expressly recognises. Taking this into consideration together with the very high overall compliance rate, the level of sunlight amenity within the development would be acceptable.

Internal noise and vibration levels

320. Conditions are recommended requiring pre-occupation testing of the separating floors and walls to demonstrate that the relevant acoustic performance standards, as prescribed by the Building Regulations, have been met. This will ensure that the occupiers of the dwellings do not experience excess noise, transmitted either vertically or horizontally, from adjacent sound sources. Similarly, a condition is recommended requiring all habitable rooms to be protected against excessive vibration dose values.

On-site storage facilities for refuse and deliveries

321. Each of the two blocks would have dedicated communal refuse facilities, in appropriate locations convenient for the residential occupiers.
322. Neither Block C nor Block D incorporates any externally accessible rooms for the storing of deliveries and other bulky items. Given that this type of facility would most probably require oversight by a concierge or other on-site management personnel, which in turn would have an inflationary effect on service charges, no such facility is proposed. Therefore, residents would be expected to accept larger deliveries in person and take them directly to the home. Given that good levels of built-in storage have been provided within the dwellings, this is considered acceptable and in line with policy requirements.

Conclusion on quality of conventional residential accommodation

323. The proposal would deliver 120 new homes benefitting from a good quality of outlook, with a majority enjoying dual aspect, a logical layout and practically-sized rooms. While a small proportion of the tested rooms would not pass the BRE daylight and sunlight recommendations, this is in most cases attributable to the presence of oversailing balconies, the residential amenity benefits of which must be factored into the planning balance. Finally, the host buildings would be indistinguishable from each other in terms of quality of external design and fit-out, thus ensuring imperceptibility of tenure. For these reasons, it is considered that the conventional residential accommodation would achieve a high quality of design.

External amenity space and young people's play space

Private external amenity space

324. All new residential development must provide an adequate amount of useable outdoor amenity space. The Council's Residential Design Standards SPD sets out the required amenity space standards, which can take the form of private gardens, balconies, terraces and/or roof gardens. It requires:
- for dwellings containing three or more bedrooms, the provision of 10 square metres of private amenity space;
 - for dwellings containing two or fewer bedrooms, the provision of 10 square metres of private amenity space wherever possible, permitting any shortfall to be added to the communal space, and;
 - 50 square metres of communal amenity space per development.
325. For 8 of the proposed dwellings, it has not been possible to provide 10 square metres of private amenity space. To compensate for these private amenity space shortfalls, and as the Council's Residential Design Standards SPD allows, there would be an overprovision of communal amenity space within each of the blocks, as explained in the table below:

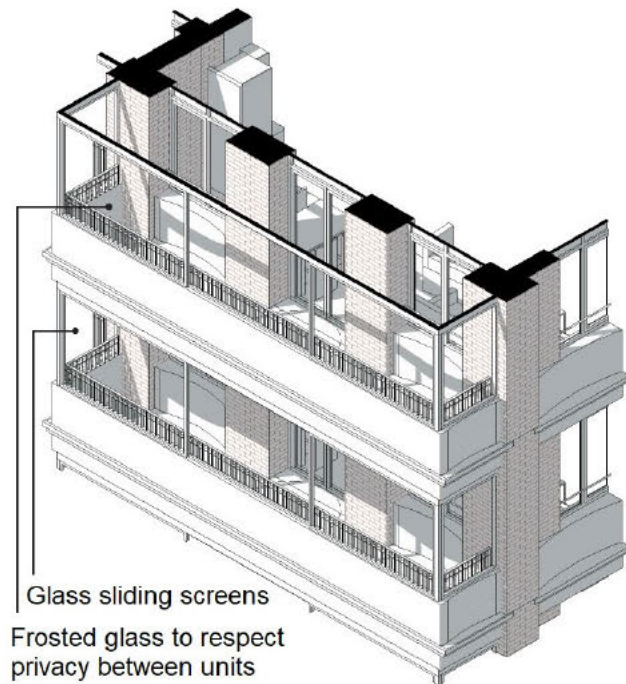
Private amenity space shortfall and offset: Summary table				
	<u>Total private amenity shortfall (sq. m)</u>	<u>Communal requirement (shortfall + 50 sq. m)</u>	<u>Communal provision (sq. m)</u>	<u>Surplus (sq. m)</u>
Block C	6.6	56.6	69*	+12.4
Block D	36.2	86.2	131^	+44.8

* This comprises 50% of the 40 sq.m shared communal space on Level 05 (i.e. 20 sqm) added to the 49 sq.m at Level 15
 ^ This comprises 50% of the 40 sq.m shared communal space on Level 05 (i.e. 20 sqm) added to the 61 sq.m at Level 03 and the 50 sq.m at Level 09

326. Of the 120 proposed dwellings, 94 would have private amenity spaces of at least 10 square metres. The 26 homes where the private amenity space would be less than 10 square metres comprise 12 social rent units and 14 in shared ownership. In the majority of cases the shortfall would be very small (less than 0.5 square metres) with the single greatest shortfall being 2.7 square metres. It should be noted that of the 26 homes, four are family-sized; while this is technically policy non-compliant, in all four of these instances the shortfall would be very small at 0.4 square metres, which is considered permissible.

327. While the majority of private amenity spaces would take the form of a conventional balcony, those facing west on the lower levels of the South Building would be designed with a glass enclosure to mitigate noise from Ilderton Road traffic – these types of outdoor amenity space are sometimes referred to as ‘winter gardens’. Where this would be the case, a minimum of 50% sliding glazed elements would enable purge ventilation and avoid overheating.

Image 52 (right): Axonometric showing the winter garden design



328. In summary, while it should be recognised that the size of some proposed private amenity spaces would be less than 10 square metres, no home would have a balcony or winter garden any smaller than 7.3 square metres, and the communal external amenity spaces have been oversized to compensate for these shortfalls, which is permitted by policy. The impact on the occupiers of homes with a smaller external amenity space has in some instances been mitigated by over-sizing the internal accommodation. Balancing the various factors in the round, the private outdoor amenity space provision is considered to be acceptable.

Communal external amenity space

329. As mentioned in the preceding part of this report, the proposed development would deliver 200 square metres of communal outdoor amenity space, exceeding the minimum requirement of 142.8 square metres.
330. The applicant intends to provide a series of raised gardens for the exclusive use of the 120 households, where communal external space would be intertwined with play facilities. The table below details the size of each garden, as well as the proportion that would be given over to a communal external amenity space function:

Communal external amenity provision				
Block	Location	Total area (sq.m)	Area designated for communal amenity (sq.m)	Area designated for play space (sq.m)
Blocks C & D	Level 05	212	40	172

Block C	Level 15	249	49	200
Block D	Level 03	99	61	38
	Level 09	253	50	203
Summary				
All blocks	Levels 03-15	813	200	613

331. The applicant proposes that all four gardens would be available to all 120 households, with Block C residents being able to use fobs to gain entry to any of the gardens that are accessed via Block D, and vice-versa. This is welcomed in the interests of tenure integration.
332. The rooftop gardens will have a mix of furniture, some fixed and others loose, that provide opportunities to sit and relax individually or in groups, to work, and dine. This furniture will be set amongst flower-rich perennial planting.
333. The format, distribution, locations and quantum of communal amenity space meets the expectations of Policy D6 of the London Plan. As such, the provision is considered acceptable



Image 53 (above): Visualisation of Block D's rooftop garden, located at Level 09 of the building, where communal amenity space and playspace would intertwine in an open-air environment.

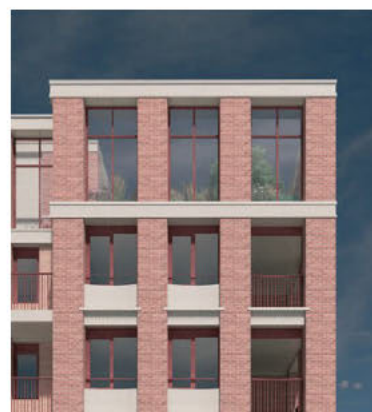


Image 54 (above): View of Block D's rooftop garden, as seen facing east from Ilderton Road.

334. Planning conditions are recommended requiring details of the finalised scheme of landscaping, treatment and enclosures, and for the facilities to be delivered prior to occupation of any of the dwellings. Unrestricted and equitable access to all the communal amenity spaces (i.e. on the podium and at the roof level of each block) is to be secured for all 120 homes in the Section 106 Agreement.

Young people's play space

335. Policy S4 of the London Plan 2021 requires new developments to make provision for play areas based on the expected child population of the development.

336. In line with the Mayor's Play and Informal Recreation SPG, the total children's play space requirement for the proposed development is 1,131 square metres.
337. Play facilities and communal open space can be designed to be intertwined, but must be counted as discrete elements (i.e. playspace and communal playspace cannot be double counted). As set out in the draft AAP, if a development proposes any on-site public open space, this can be counted towards the playspace provision and towards the public open space, provided that the public open space is genuinely playable.
338. The table below shows how the 1,131 square metre yield breaks down across the three age groups the Mayor expects playspace to be designed for, and how the application proposes to meet the requirements:

Play space yield and proposed provision: Summary table			
Block	Young person yield from development	Area of play space required (sq.m)	Format (size and location) of proposed provision
Block C	Aged under 5	385	156 sq.m (Block D rooftop) [Shortfall: 229 square metres]
	Aged 5 to 11	337	8 sq.m (Block D Level 03) and 172 sq.m (Block C/D podium) [Shortfall: 157 square metres]
	Aged 12 to 17	323	191 sq.m (Block C rooftop) [Shortfall: 132 square metres]
		= 1045	
Block D	Aged under 5	47	47 sq.m (Block D rooftop) [Minimum requirement met]
	Aged 5 to 11	30	30 sq.m (Block D Level 03) [Minimum requirement exceeded]
	Aged 12 to 17	9	9 sq.m (Block C rooftop) [Minimum requirement met]
		= 86	
Summary			
Both Blocks	All ages	1131	613 sq.m (Block C/D podium, Block D Level 03, Block C rooftop, Block D rooftop) [Total shortfall: 518 square metres]

339. Although the four gardens would provide only 613 square metres of the total playspace yield generated by the predicted child population, as the proposed development also incorporates a Pocket Park, which would provide genuinely playable space, this can be counted towards the total. Having a total area of 570 square metres, the Pocket Park would fulfil the remaining 518 square metres of the quota. As such, the 1,131 square metre playspace requirement has been fully satisfied.

340. The podium-level garden linking Block C to D is intended to be a planted environment amongst which there would be mini trampolines, play mounds and cubby houses. These play features are aimed mainly at the 5-11s age group. Further facilities targeted at this age band would be located within the Level 03 garden at Block D. The type of facilities to be provided here would be typically gentle and quiet in nature, such as board/tabletop games, to ensure successful coexistence of the playspace alongside two adjacent private amenity spaces.

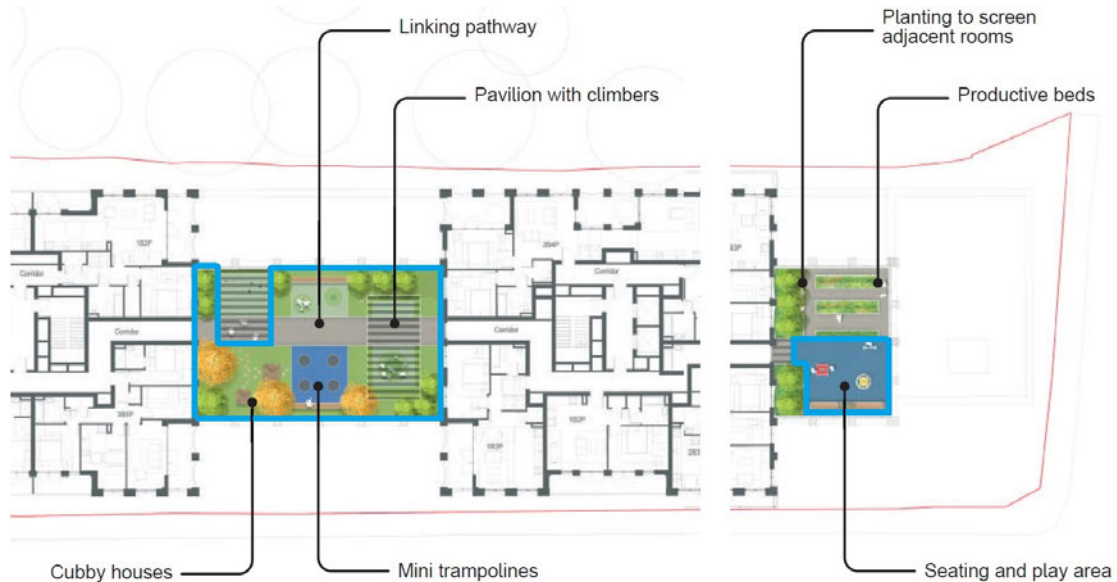


Image 55 (above): Plan of the podium garden at Level 05 of the development, which is situated between Blocks C and D, with the area designated as playspace edged in blue.

Image 56 (above): Plan of the Block D garden at Level 03, with the area designated as playspace edged in blue.

341. The other two age groups would have their play needs met by the Block C and Block D roof gardens. The Block C roof garden would be oriented at the 12-17s age band, where play facilities would include a bouldering wall and table tennis, whereas the playspace in the Block D roof garden would be dedicated to under-5s play with see-saws, roundabouts and tactile landscape features.



Image 57 (above): Roof plan of the South Building, showing the gardens on Level 15 of Block C and Level 09 of Block D, with the areas designated as playspace edged in red and purple respectively.

342. The London Plan recommends that under-5s play space be at least 100 square metres in size, in part because the space needs to be of an adequate size to ensure carers can sit and talk while supervising children. At 203 square metres and featuring areas for informal sitting and relaxing around the play facilities, the dedicated play area on the Block D rooftop would fully comply with this requirement.
343. Southwark Plan Policy P15 requires play space to have multiple egress points, and to be located at ground or low podium. Although the roof gardens at Levels 15 and 09 would not meet these criteria, the applicant has stated in writing that the location and design of both spaces would comply with the relevant fire safety and building control regulations. Specifically, all floor/roof elements would achieve 120 minute fire rating in Blocks A-C and 60 minute fire rating in Block D, while all walls separating apartments from communal gardens would achieve 60 minute fire rating. The fire exit from both of the gardens would be located centrally such that, for anyone within either garden wishing to egress, the maximum travel distance to the fire exit would be short, at 15 metres. Given that separate regulatory regimes exist to deal with fire safety and building control matters, it is considered that the effective operation of those regimes can be relied upon to deal with any fire or building safety risk that the two high-level play spaces may present. As such, the proposal for high-level play spaces with single egress points is, in this instance, considered acceptable having regard to the relevant planning policies and the role of the planning system.
344. All of the play spaces would be equally accessible to all tenures. Service charge costs to social rent tenants would be capped within social rent cap levels.
345. Planning conditions are recommended requiring details of the four resident-only play spaces and the Pocket Park, including equipment and treatment, which will include a requirement for water and sand play facilities to be provided on the podium and in the Pocket Park. These conditions will require the facilities to be delivered prior to occupation of any of the dwellings. With these details secured, the proposed play space offer is considered acceptable.



Images 58, 59 and 60 (above): Precedent images provided by the applicant of the types of play envisaged for the under-5s (left hand image), 5-11s (middle image) and 12-and-overs (right hand image).

Amenity impacts on nearby residential occupiers and the surrounding area

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

Daylight and sunlight

347. The NPPF sets out guidance with regards to daylight/sunlight impact and states “when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site”. The intention of this guidance is to ensure that a proportionate approach is taken to applying the BRE guidance in urban areas. London Plan Policy D6 sets out the policy position regarding this matter and states “the design of development should provide sufficient daylight and sunlight to new and surrounding houses that is appropriate for its context”. Policy D9 states that daylight and sunlight conditions around tall building(s) and the neighbourhood must be carefully considered. Southwark Plan policies identify the need to properly consider the impact of daylight/sunlight without being prescriptive about standards.
348. The BRE Guidance sets out the rationale for testing the daylight impacts of new development through various tests. The first and most readily adopted test prescribed by the BRE Guidelines is the Vertical Sky Component assessment (VSC). This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27%, which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by approximately 20% of the original value before the loss is noticeable.
349. The second method is the No Sky Line (NSL) or Daylight Distribution (DD) method, which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of more than 20% in the area of sky visibility, daylight may be affected.

Properties assessed for daylight impacts

350. This planning application was accompanied by a daylight and sunlight assessment undertaken in accordance with the BRE guidelines. The document assesses the extent to which the proposed development would affect the dwellings in the following buildings:
- a. 128 Ilderton Road (also known as 141 Verney Road);

- b. 45-56 Barkworth Road;
 - c. 35 and 37 Ablett Street;
 - d. 34, 36 and 38 Delaford Road;
 - e. 21-43 Delaford Road flats; and
 - f. 1, 3, 5, 7, 11 and 13 Delaford Road.
351. Testing was also undertaken of the following building, which is a place of worship with ancillary office facilities, and thus has a reasonable expectation of daylight receipt:
- g. Baptist Church at 163 Ilderton Road.
352. The above seven properties were tested for VSC and NSL impacts, but not illuminance as this method is more appropriately applied to new buildings.
353. The applicant's daylight and sunlight assessment also undertook testing of:
- h. Primary School at 128 Ilderton Road [educational use];
 - i. 21-33 (odds) Ablett Street;
 - j. 28, 30 and 32 Delaford Road;
 - k. 15, 17 and 19 Delaford Road;
 - l. 41 Ilderton Road (mobile homes).
354. However, by reason of their distance from and relationship to the site, none of these five buildings would experience any daylight impacts above the recommendations of the BRE guidance. Therefore, this report gives no further consideration to the daylight impacts on these properties.
355. Provided below is a map of the tested residential buildings (in turquoise) and the tested non-residential buildings (in pink) showing their relationship to the application site (in orange). The buildings that would not experience daylight impacts above the recommendations of the BRE guidance are edged in blue; the buildings that would experience exceedances are edged in red:



Image 61 (above): Plan of the site with the surrounding existing sensitive residential and non-residential buildings. The references 'a' to 'l' correspond with the addresses as listed above.

356. East of the application site, on the opposite side of the elevated mainline railway line is the outline consented scheme known as Surrey Canal Triangle (Lewisham planning application reference number: DC/13/085143). Although Surrey Canal Triangle is not yet under construction, given the outline planning status of the development, it has been included within the baseline of the submitted technical assessments. It is appropriate to factor-in schemes with a reasonable prospect of being built-out and which will cause material reductions in daylight and sunlight to receptors in the vicinity of an application site, in order that the cumulative 'worst-case scenario' for all neighbouring residential receptors has been assessed.



Image 62 (above): Visualisation of the Surrey Canal Triangle outline consented scheme in relation to the application site and the existing built context.

VSC and NSL impacts for sensitive surrounding residential properties

357. The tables below summarise the VSC impacts to surrounding properties as a result of the proposed development being built-out in the present day context plus the Surrey Canal consented development. The first table is concerned with residential properties and the second table is concerned with non-residential properties. Both tables include a comparison of the proposal's impacts relative to those caused by the extant permission (18/AP/2497):

Residential Property	Number of windows that would experience a VSC reduction (as a percentage of the baseline VSC value)			
	No loss or a loss of up to 19.9%	20%-29.9% (minor adverse impact)	30%-39.9% (moderate adverse impact)	40% + (substantial adverse impact)
128 Ilderton Road				
Total no. habitable windows tested: 29				
<ul style="list-style-type: none"> Of the 29 windows, 10 would retain a VSC of 27% or more. For the <u>19</u> that would not, the distribution of percentage reductions is: 				
Proposed vs existing	11	8	0	0
<u>Comparison of the proposal's impacts against those caused by consented scheme</u>				
18/AP/2497 vs existing**	8	2	0	0
Comparative impact of 23/AP/0387		Worse:	6 No change	No change

	more			
<i>** Note: in this scenario, of the 29 windows tested, 19 retained a VSC of 27% or more</i>				
45-56 Barkworth Road				
Total no. habitable room windows tested: 162				
<ul style="list-style-type: none"> Of the 162 windows, 16 would retain a VSC of 27% or more. For the <u>146</u> that would not, the distribution of percentage reductions is: 				
Proposed vs existing	16	16	25	89
<u>Comparison of the proposal's impacts against those caused by consented scheme</u>				
18/AP/2497 vs existing**	18	18	27	82
Comparative impact of 23/AP/0387		Better: 2 fewer	Better: 2 fewer	Worse: 7 more
<i>** Note: in this scenario, of the 162 windows tested, 17 retained a VSC of 27% or more</i>				
35 and 37 Ablett Street				
Total no. habitable room windows tested: 13				
<ul style="list-style-type: none"> Of the 13 windows, 2 would retain a VSC of 27% or more. For the <u>11</u> that would not, the distribution of percentage reductions is: 				
Proposed vs existing	5	5	0	1
<u>Comparison of the proposal's impacts against those caused by consented scheme</u>				
18/AP/2497 vs existing	8	2	0	1
Comparative impact of 23/AP/0387		Worse: 3 more	No change	No change
34, 36 and 38 Delaford Road				
Total no. habitable room windows tested: 33				
<ul style="list-style-type: none"> Of the 33 windows, 4 would retain a VSC of 27% or more. For the <u>29</u> that would not, the distribution of percentage reductions is: 				
Proposed vs existing	25	2	2	0
<u>Comparison of the proposal's impacts against those caused by consented scheme</u>				
18/AP/2497 vs existing	17	9	1	2
Comparative impact of 23/AP/0387		Better: 7 fewer	Worse: 1 more	Better: 2 fewer
21-43 Delaford Road flats				
Total no. habitable room windows tested: 45				
<ul style="list-style-type: none"> Of the 45 windows, 17 would retain a VSC of 27% or more. For the <u>28</u> that would not, the distribution of percentage reductions is: 				

Proposed vs existing	25	3	0	0
<u>Comparison of the proposal's impacts against those caused by consented scheme</u>				
18/AP/2497 vs existing**	22	7	1	0
Comparative impact of 23/AP/0387		Better: 4 fewer	Worse: 1 more	No change
<i>** Note: in this scenario, of the 45 windows tested, 15 retained a VSC of 27% or more</i>				
1, 3, 5, 7, 11 and 13 Delaford Road				
Total no. habitable room windows tested: 18				
<ul style="list-style-type: none"> Of the 18 windows, 1 would retain a VSC of 27% or more. For the <u>17</u> that would not, the distribution of percentage reductions is: 				
Proposed vs existing	17	0	0	0
<u>Comparison of the proposal's impacts against those caused by consented scheme</u>				
18/AP/2497 vs existing**	12	0	0	0
Comparative impact of 23/AP/0387		No change	No change	No change
<i>** Note: in this scenario, of the 18 windows tested, 6 retained a VSC of 27% or more</i>				

Non-residential Property	Number of windows that would experience a VSC reduction (as a percentage of the baseline VSC value)			
	No loss or a loss of up to 19.9%	20%-29.9% (minor adverse impact)	30%-39.9% (moderate adverse impact)	40% + (substantial adverse impact)
Former Baptist Church at 163 Ilderton Road				
Total no. habitable windows tested: 40				
<ul style="list-style-type: none"> Of the 40 windows, 8 would retain a VSC of 27% or more. For the <u>32</u> that would not, the distribution of percentage reductions is: 				
Proposed vs existing	18	14	0	0
<u>Comparison of the proposal's impacts against those caused by consented scheme</u>				
18/AP/2497 vs existing**	8	0	0	0
Comparative impact of 23/AP/0387		Worse: 14 more	No change	No change
<i>** Note: in this scenario, of the 40 windows tested, 32 retained a VSC of 27% or more</i>				

358. The table below summarises the NSL (also known as 'daylight distribution') impacts to surrounding properties as a result of the proposed development being built-out in the present day context plus the Surrey Canal consented development. The first table is concerned with residential properties and the

second table is concerned with non-residential properties. Both tables include a comparison of the proposal's impacts relative to those caused by the extant permission (18/AP/2497):

Residential property	No. windows that would experience a reduction in NSL (as a percentage of the baseline NSL value)			
	No loss or a loss of up to 19.9%	20%-29.9% (minor adverse impact)	30%-39.9% (moderate adverse impact)	40% + (substantial adverse impact)
128 Ilderton Road				
Total no. habitable rooms tested: 20				
Proposed vs existing	20	0	0	0
<u>Comparison of the proposal's impacts against those caused by consented scheme</u>				
18/AP/2497 vs existing	20	0	0	0
Comparative impact of 23/AP/0387		No change	No change	No change
45-56 Barkworth Road				
Total no. habitable rooms tested: 104				
Proposed vs existing	44	22	29	9
<u>Comparison of the proposal's impacts against those caused by consented scheme</u>				
18/AP/2497 vs existing	93	8	3	0
Comparative impact of 23/AP/0387		Worse: 14 more	Worse: 26 more	Worse: 9 more
35 and 37 Ablett Street				
Total no. habitable rooms tested: 11				
Proposed vs existing	10	0	1	0
<u>Comparison of the proposal's impacts against those caused by consented scheme</u>				
18/AP/2497 vs existing	11	0	0	0
Comparative impact of 23/AP/0387		No change	Worse: 1 more	No change
34, 36 and 38 Delaford Road				
Total no. habitable rooms tested: 21				
Proposed vs existing	20	1	0	0
<u>Comparison of the proposal's impacts against those caused by consented scheme</u>				
18/AP/2497 vs existing	20	1	0	0

Comparative impact of 23/AP/0387	No change	No change	No change
21-43 Delaford Road flats			
Total no. habitable rooms tested: 39			
Proposed vs existing	39	0	0
<u>Comparison of the proposal's impacts against those caused by consented scheme</u>			
18/AP/2497 vs existing	39	0	0
Comparative impact of 23/AP/0387	No change	No change	No change
1, 3, 5, 7, 11 and 13 Delaford Road			
Total no. habitable rooms tested: 18			
Proposed vs existing	15	1	2
<u>Comparison of the proposal's impacts against those caused by consented scheme</u>			
18/AP/2497 vs existing	17	0	1
Comparative impact of 23/AP/0387	Worse: 1 more	Worse: 1 more	No change

Non-residential Property	No. windows that would experience a reduction in NSL (as a percentage of the baseline NSL value)			
	No loss or a loss of up to 19.9%	20%-29.9% (minor adverse impact)	30%-39.9% (moderate adverse impact)	40% + (substantial adverse impact)
Former Baptist Church at 163 Ilderton Road				
Total no. habitable rooms tested: 40				
Proposed vs existing	14	0	0	0
<u>Comparison of the proposal's impacts against those caused by consented scheme</u>				
18/AP/2497 vs existing**	14	0	0	0
Comparative impact of 23/AP/0387	No change	No change	No change	No change

128 Ilderton Road

359. The 8 windows to undergo a minor adverse losses of VSC would in all instances retain an absolute level of VSC in excess of 15%, which is not especially low for an urban environment. The technical analysis also shows that seven of the eight transgressions would affect a bedroom, a room type the BRE recognises as being less sensitive to daylight loss.

360. In terms of the second daylight assessment, the NSL, the results record full BRE

compliance.

361. For these reasons, the daylight impacts on the flats in 128 Ilderton Road are considered acceptable on balance.

45-56 Barkworth Road

362. Nos. 45-56 Barkworth Road is a group of five apartment buildings, arranged in two clusters either side of Barkworth Road:

- nos. 45 and 47, “the southern cluster”, are a conjoined pair to the south side of the road; and
- nos. 52, 54 and 56, “the northern cluster”, form a conjoined trio to the north side of the road.

363. In terms of current daylight receipt, all of the apartments experience extremely good amenity. For example, the average existing level of absolute VSC across all the apartments (with unobstructed views over the site) is circa 27%, and approximately half of those windows currently have an absolute VSC of over 30%. To retain these VSC levels would require the height of any redevelopment on the application site to be lower than a threshold plane angled at 25° from horizontal. However, such low-to-rise buildings would not align with the intentions of the draft OKR AAP, which anticipates redevelopment of the site to be significantly beyond the parameters of a 25° plane, with an expectation of delivering buildings that would be noticeably taller than the existing surrounding context.

364. Of the 104 windows tested, 89 would undergo a substantial adverse VSC reduction. These split between the northern and southern clusters in a ratio of 78:11.

365. The 78 substantially adversely impacted windows at the northern cluster would retain the following absolute VSC levels:

- 15.0% or higher: none
- 10.0% to 14.9%: x42 windows (x14 at no. 52; x14 at no. 54; x14 at no. 56)
- 9.9% or lower: x36 windows (x12 at no. 52; x12 at no. 54; x12 at no. 56)

366. In respect of the 11 substantially adversely impacted windows at the southern cluster, the spread of resulting absolute VSC levels would be:

- 15.0% or higher: none
- 10.0% to 14.9%: x3 windows (all at no. 45)
- 9.9% or lower: x8 windows (x2 at no. 47; x6 at no. 45)

367. All of the 44 windows whose resulting absolute VSC would be less than 10.0% are overhung by the deeply-projecting eaves of the roof structure; these features of the buildings’ own design have the effect of reducing the availability of

-
- daylight. As a result, the existing VSC levels are generally lower than would otherwise be expected, and the windows are more sensitive to changes in the skyline directly opposite. While the proposed development would have an appreciable impact on the occupiers' amenity, it is not considered that the degree of harm would warrant refusal of planning permission.
368. For the 45 windows that would retain a VSC of 10.0% to 14.9%, while these levels are low, they are not unreasonably so given the properties' location in an Opportunity Area where significant densification is expected.
369. With regard to NSL, all of the site-facing rooms at 45-56 Barkworth Road currently benefit from an exceptionally high level of sky visibility for an urban setting of this type. This is because the land directly opposite (the application site) is empty of buildings. Thus, and as with the VSC analysis discussed above, relative changes in NSL exceeding the typical 20% margin in the BRE guidance are to be expected from redevelopment of the land and are not necessarily indicative of unreasonable levels of retained daylight amenity in the rooms affected. Moreover, and as discussed in detail above, the existing outlook of these properties over the undeveloped site means that any development in accordance with the ambitions of the draft AAP would inevitably, and noticeably, breach the typical recommendations in the BRE Guidelines.
370. The greatest level of NSL impact (categorised as "substantial adverse") would be experienced by 9 of the 104 rooms tested. These substantial adverse impacts split between the northern and southern clusters in a ratio of 7:2. The single greatest proportional change would affect a ground floor room at 52 Barkworth Road, in the northern cluster. In this 14.0 square metre room, the portion from which sky can be seen would drop from 13.7 square metres to 7.2 square metres as a result of the development. While a change of this magnitude would be noticeable to the occupiers, it would still be possible for users to see direct sky from more than half of the room, meaning the space as a whole would not become uncomfortably cold or dark.
371. In summary, the redevelopment of this vacant site to facilitate any development in line with the ambitions of the draft AAP would result in windows and rooms at nearby properties incurring a relative change to their daylight amenity in excess of the parameters advised by the BRE. As discussed above, in these situations the BRE guidance recommends that decision-makers take into account the absolute levels of daylight that would be retained. This more detailed analysis shows that, while there would be harmful VSC impacts for some of the Barkworth Road flats, in a number of these instances the starting absolute VSC is low and/or the effects are partly attributable to the buildings' own design. With regard to NSL, while there would be a number of instances where the proportion of the rooms from which sky can be seen would be adversely reduced, in all cases a reasonable square metreage would remain from which the room users would enjoy direct sky visibility. This would guard against the room feeling uncomfortably colder or darker.
372. Taking into account all of the considerations discussed above, on balance the impacts for the 45-56 Barkworth Road properties are considered acceptable.

35 and 37 Ablett Street

373. Together, this pair of two-storey dwellinghouses would experience five minor adverse VSC losses and one substantial adverse VSC loss. Out of the six window transgressions, five would retain an absolute VSC in excess of 17%, which –while lower than the absolute VSC of 27% recommended by the BRE– is not untypical for an urban location. These resulting absolute VSCs indicate that occupiers would enjoy reasonable levels of natural light.
374. The one other window to undergo an adverse loss of VSC would be a ground floor window in the side elevation of 37 Ablett Street. Its resulting absolute VSC would be 9.46%, down from an existing absolute VSC of 22.87%. The window faces directly towards the site, and thus is reliant on the openness of the site for its current level of daylight. Any reasonable redevelopment of the site would, therefore, inevitably affect VSC receipt.
375. With regard to NSL reductions in excess of the BRE guidance, the one affected window is at ground floor level in the side elevation of no. 37 Ablett Street. Here, a moderate adverse loss of 31.1% in sky visibility would occur. While the impact on the room users must be acknowledged, it must also be recognised that this room benefits from an uncharacteristically good area of sky visibility because it faces directly towards the application site, which is a large area of land clear of buildings and most recently used as surface car parking. The lit area of the room would reduce from 4.1 square metres to 2.8 square metres, which would not result in the room becoming uncomfortably cold, dark or shadowed.
376. On balance, and although it is recognised that the users of the affected rooms at 35 and 37 Ablett Street would experience a noticeable impact, it is not considered that the impact would be significantly harmful to their overall amenity.

34, 36 and 38 Delaford Road

377. The results of the VSC assessment show that 23 out of 27 windows would adhere to the BRE Guidelines. The other four windows comprise two impacted to a minor adverse extent and two to a moderate adverse extent. Of these four windows, the single greatest percentage loss and the single lowest resulting absolute VSC would occur at the same window; this is at ground floor level in the side elevation of a lean-to extension at 38 Delaford Road. The proposed absolute VSC would be 13.91%, reduced from an existing absolute VSC of 22.60%, equating to a percentage loss of 38.45%. Although impacts of this kind would be noticeable to room occupants, the room in question is understood to be served by two other (rear-facing) windows, both of which would achieve comparatively much better levels of absolute VSC thus providing adequate mitigation.
378. There would only be one loss of NSL beyond the BRE guidelines. The room in question, R2/80 at 38 Delaford Road, records a light change of 23.4% beyond the existing baseline. It would still be possible for users to see direct sky from a 9.2 square metre portion of the 12.4 square metre room, meaning the space as

a whole would not become uncomfortably cold or dark.

379. A final relevant consideration is that the NSL and VSC impacts produced by the proposed development are similar to, if not a slight improvement on, the impacts recorded by the extant planning permission, 18/AP/2497.

21-43 Delaford Road flats

380. At this block of flats, a total of three windows would experience VSC losses beyond the BRE guidelines, and all three losses would fall within the “minor adverse” category. Two of the three exceedances would only be marginally beyond the 20% threshold established by the BRE. The one other minor adverse loss would affect a top floor window where a 28.07% loss would occur resulting in an absolute VSC of 10.97%. While this impact must be recognised, it should be noted that the VSC level of this window is already relatively low; this is attributable partly to it being obliquely flanked by a neighbouring wall and partly to the deeply overhanging roof eaves immediately above. As such, any further reduction generates a sizeable percentage loss that isn’t necessarily reflective of the impact the room users will experience.
381. An additional relevant consideration is that the VSC impacts produced by the proposed development are very similar to those that the extant planning permission, 18/AP/2497, would have caused.
382. The fact that there would be no NSL losses in excess of the BRE guidance supports the position that there would be no materially harmful impact to the daylight levels and feel of the affected rooms

1, 3, 5, 7, 11 and 13 Delaford Road

383. None of these six properties would experience a VSC loss in excess of the BRE guidance.
384. With regard to NSL, the two rooms to experience a moderate adverse impact are located at ground floor level, one at 1 Delaford Road and the other at 3 Delaford Road. As these rooms look directly towards the vacant application site, they benefit from a largely unobstructed view. Any reasonable redevelopment of the site would, therefore, have an effect on the area of sky visible from these rooms. In these two cases, the lit area of the rooms would be 58.7% and 64.1% once the proposed development has been constructed, which is not uncommon in an urban location. The one room impacted to a minor adverse impact, which is at 11 Delaford Road, would undergo a loss of 20.2%. This only marginally exceeds the 20% BRE threshold. As such, the occupiers of these three properties would not have their amenity harmed.

Baptist Church at 163 Ilderton Road

385. While none of the windows at the Baptist Church would undergo NSL losses in excess of the BRE guidelines, VSC would be reduced to beyond the BRE recommendation in 14 instances. In all 14 cases, there would be a minor

adverse impact, with the greatest percentage reduction being 26.21% and the lowest resulting absolute VSC being 19.88%. For a sensitive non-residential building, this extent of impact and the retained VSC levels would not render the interior spaces impractical or severely limited for the uses they typically host.

Surrey Canal Triangle Site

386. In addition to the residential properties that surround the south and west of the site, an assessment of the outline consented scheme for the Surrey Canal Triangle site was also undertaken. The purpose of this was to establish any potential effects on the daylight availability to the site-facing facades following the implementation of the proposed development. Given the outline status of the Surrey Canal Triangle consent, details are not yet available on the room and window locations of the development, and as such a VSC daylight façade analysis was undertaken to indicate the potential for daylight availability on those elevations that face towards the proposed development.
387. The results of the proposed VSC façade assessment show that the vertical elevations of the proposed Surrey Canal Triangle scheme will retain very good daylight availability. The recorded changes from the existing scenario are isolated to the western elevation on the lower levels. In any event, the assessment demonstrates the retained values at the lower levels will remain good at more than 20% VSC. The internal vertical façade does not record material changes when compared to the existing baseline scenario.

Sunlight

388. The applicant's daylight and sunlight report has assessed the impact of the proposed development on the sunlight received at all windows facing within 90 degrees of due south. The BRE guide states that nearby windows must be assessed using the three-stage process set out below to determine if, as a result of the development, the sunlight levels would reduce to an extent that the room may feel colder and less pleasant.
389. The first stage is to determine if the window would experience:
- a reduction in sunlight to less than 25% Annual Probable Sunlight Hours (APSH); or
 - a reduction in sunlight to less than 5% Winter Probable Sunlight Hours (WPSH); or
 - both of the above.
390. If one of the above criteria is triggered, the next stage is to determine if:
- the window's resulting APSH is less than 0.8 times its former value; or
 - the window's resulting WPSH is less than 0.8 times its former value; or
 - both of the above.
391. Where one of the criteria in Stage 2 is met, the final stage is to determine if the overall loss of sunlight across the whole year would reduce by more than 4% of
-

APSH.

392. The six properties assessed for daylight impacts have also been assessed for sunlight impacts. The table below summarises these:

Property	No. of rooms that would experience a reduction in sunlight hours			
	No. of rooms tested	No. of rooms that pass	No. of rooms that fail winter	No. of rooms that fail annual
128 Ilderton Road				
Proposed vs existing	10	10	0	0
<u>Comparison of the proposal's impacts against those caused by consented scheme</u>				
18/AP/2497 vs existing	10	10	0	0
Comparative impact of 23/AP/0387		No change	No change	No change
45-56 Barkworth Road				
Proposed vs existing	8	8	0	0
<u>Comparison of the proposal's impacts against those caused by consented scheme</u>				
18/AP/2497 vs existing	8	8	0	0
Comparative impact of 23/AP/0387		No change	No change	No change
35 and 37 Ablett Street				
Proposed vs existing	4	4	0	0
<u>Comparison of the proposal's impacts against those caused by consented scheme</u>				
18/AP/2497 vs existing	4	4	0	0
Comparative impact of 23/AP/0387		No change	No change	No change
34, 36 and 38 Delaford Road				
Proposed vs existing	10	10	0	0
<u>Comparison of the proposal's impacts against those caused by consented scheme</u>				
18/AP/2497 vs existing	10	10	0	0
Comparative impact of 23/AP/0387		No change	No change	No change
21-43 Delaford Road flats				
Proposed vs existing	18	16	0	2

<u>Comparison of the proposal's impacts against those caused by consented scheme</u>				
18/AP/2497 vs existing	18	15	0	3
Comparative impact of 23/AP/0387		Better: 1 more	No change	Better: 1 fewer

393. In the case of the one address where exceedances would occur (the Delaford Road flats), by reason of their outlook over the currently vacant application site all of these windows benefit from very good sunlight levels at present. Their orientation is to the east, the obliqueness making them heavily reliant on the site for sunlight hours. Thus, any meaningful development opposite would result in a sizeable loss. Given that all three of these windows would remain WPSH compliant, and while acknowledging that there would be an appreciable change to APSH for the occupiers, on balance the impacts would not be harmful to residential amenity.

Daylight and sunlight impacts relative to those caused by 18/AP/2497

394. As the tables above show, the effect on neighbouring properties caused by the proposed development would be similar to those produced by the previous planning consent for the site, 18/AP/2497, which is extant and thus could technically be implemented. In determining 23/AP/0387 some weight must be given to the fact that the daylight and sunlight losses produced by the newly-proposed development are not substantially greater than those established by 18/AP/2497.

Conclusion on daylight and sunlight

395. In total, the development would result in 48 minor, 27 moderate and 90 substantial adverse reductions in VSC for surrounding properties. With respect to NSL, there would be a total of 24 minor, 32 moderate and nine substantial reductions for surrounding properties. These exceedances of the BRE guidance, and the negative impact they would have on neighbour amenity, should be given some weight in determining the application.

396. Sunlight exceedances would be experienced by a small number of windows at the Delaford Road flats. All of these windows face east in the general direction of the application site. As such, they are reliant on the openness of the land to achieve these baseline APSH levels, which are relatively high for an urban environment. In turn, this makes the windows more susceptible to change. While the extent of ASPH impact is recognised, it is not considered that the resulting levels would be harmful to amenity.

397. The existing site is an empty lot of land. As a result, the existing levels of daylight within the surrounding residential properties looking over the site are unusually high for an urban location, and particularly so for a site on the fringes of an opportunity area where there is an expectation of delivering a development with a significantly greater density than that of the current surrounding context.

398. When considering the overall impact on the amenity and enjoyment of neighbouring homes, it is useful to also consider the benefits of the development

for those neighbours. They currently overlook a vacant and unkempt site, used most recently for vehicle parking. This use would, in most circumstances, be considered a poor neighbour, causing noise and being to some degree unsightly. The introduction of high quality buildings, albeit ones which affect daylight and sunlight, would have some benefits to the outlook and sense of place of these homes.

399. Given the location within the Old Kent Road Opportunity Area, where more intensive development is expected and where the BRE guidelines should be applied flexibly following the design-led approach to density promoted by the London Plan, the impacts are on balance acceptable. As noted above, the BRE guidelines are not mandatory and the advice within the guide should not be seen as an instrument of planning policy. Some of the impacts would go beyond the recommended guidelines but these are not of such significance that it would warrant a reason for refusal of an otherwise acceptable development. Furthermore, the impacts are similar in their extent to those previously deemed acceptable under the extant permission, 18/AP/2497.

Overshadowing

400. The test promoted by the BRE for assessing overshadowing impacts on external amenity space is the 'Sun on Ground' assessment. This models the proportion of an outdoor amenity space where the sun would reach the ground on 21st March each year. On that date, the BRE advises that at least 50% of the area tested should receive a minimum of two hours of sunlight.
401. There are four amenity spaces at properties neighbouring the application site which are potentially at risk of overshadowing as a consequence of the proposed development. These are the rear gardens of 35 Ablett Street, 37 Ablett Street, 36 Delaford Road and 38 Delaford Road. In the existing condition, three of the four amenity spaces record in excess of 70% of their surface area receiving at least 2 hours in sunlight on 21st March, while one records 24.4% coverage. With the proposed development in place, each space would either:
- continue to receive 2 hours in sunlight to 50%+ of its surface area; or
 - record a light change of no more than 20% from its former value.
402. With the BRE guidelines having been met, it can be concluded that no external amenity areas at nearby properties would be subject to harmful overshadowing.

Privacy

403. With regard specifically to preventing harmful overlooking of dwellings, the 2015 Technical Update to the Residential Design Standards SPD 2011 requires developments to achieve:
- a distance of 12 metres between windows on a highway-fronting elevation and those opposite at existing buildings; and

- a distance of 21 metres between windows on a rear elevation and those opposite at existing buildings.
404. All the 'across street' distances between the development and habitable residential rooms opposite would exceed 12 metres, with many being in excess of 21 metres. The closest distance between the proposed development and neighbouring residential building is 17 metres (to 38 Delaford Road) but this would be the closest pinch point of the two buildings and is a corner-to-corner relationship; there would be no directly facing habitable rooms at these distances. The remaining properties are over 20 metres away and the distance to the Mobile Homes site would be in excess of 40 metres. In summary, because the 12 metre 'across street' guideline of the Residential Design Standards would be achieved, no privacy infringement issues are raised.
405. It should also be noted that any potential of overlooking and/or perceived overlooking of the Ilderton Road Travellers' Site to the north of the application site has been greatly reduced due to the removal of a significant number of windows from the northern elevation when contrasted with the previously-consented scheme.
406. In terms of the relationship to the Surrey Canal Triangle site, where planning permission has been granted for wholesale residential-led redevelopment, the elevated railway line and its embankments create a separation distance of more than 50 metres, meaning there would be any overlooking issues in respect of any future homes that may be built on this nearby land.

Outlook and sense of enclosure

407. The site is located within the Old Kent Road Opportunity Area, where there is an expectation for greater densities and taller buildings to come forward, changing the urban grain of the locality. The proposed development would introduce to the site two buildings (the 'North' and the 'South'), each modelled as a plinth block supporting two towers above, either side of a central publicly-open space. This arrangement of buildings creates a sequence of gaps, allowing for views 'through' and opening up views of the sky for residents of the existing nearby dwellings. Devices such as open corners have been employed on Blocks C and D, along with the incorporation of high quality materials and low-level greening throughout the development, to give complexity and visual relief to building forms, all of which would have a positive effect on the surrounding properties' outlook. As such, it is not considered that any of the surrounding dwellings that look towards the site would experience a harmfully diminished quality of outlook or sense of openness as a result of the proposed development.

Management and maintenance of the PBCL

408. The applicant, Fifth State, intends to operate the PBCL premises in partnership with CRM, the latter acting primarily as the Facility and Operations Manager. CRM provides management services to over 29,000 rooms across the UK and Europe in schemes ranging from 18 units to 802 units. In the main, these are

Purpose Built Student Accommodation developments including one in Southwark ('Element' in Bermondsey); however, their portfolio also includes some PBCL, Build-to-Rent and Micro Apartment developments. CRM has been involved in the design evolution of the proposal to ensure it is fit for purpose.

409. As mentioned in an earlier part of this report, Policy H16 and Paragraph 4.16.4 of the London Plan require PBCL developments to be accompanied by an Operational Management Plan. This is in the interests of ensuring that, amongst other things, the development once operational:

- does not generate adverse neighbour amenity or local environmental impacts;
- is managed and maintained to ensure the continued quality of the accommodation, communal facilities and services; and
- will positively integrate into the surrounding communities.

410. The Operational Management Plan submitted in support of this application sets out how the development will be managed and the various spaces within the development will be maintained. In terms of the ways in which potential sources of neighbour disturbance, such as noise nuisance, would be minimised through management arrangements, the Plan details the following provisions:

- Staffing:
 - the applicant predicts that the on-site management team would number 25 FTE roles in total, comprising the following:
 - General Manager x 1 - Full Time
 - Assistant Manager x 1 - Full Time
 - Community / Resident Member Manager x 1 - Full Time
 - Events Manager x 1 - Full Time
 - Concierge / Front of House x 2 - Full Time
 - Sales/Letting Manager x 1 - Full Time
 - Maintenance Operative x 1 - Full Time
 - Facility Manager x 1 – Full Time
 - Gym Instructor x 1 – Part Time
 - Yoga & Health and Wellbeing Instructor x 1 – Part Time
 - Café Bar Staff x 3 – Full Time
 - Cleaning Staff x 8 - Contracted Full Time
 - Over Night Concierge/Security x 4 - Contracted Full Time
 - the role with the greatest responsibility will be the dedicated general manager, who will lead the management team and act as the key communicator between resident members and the wider network of staff;
 - 24/7 front-of-house services will be provide, comprising a dedicated concierge covering during the day time, with the on-site overnight concierge and/or security staff providing a presence outside of these hours.
- Noise and anti-social behaviour:
 - tenancy agreements will include rules and regulations relating to the property and local neighbourhood considerations;

- tenants will receive an 'on arrival' Welcome Pack which will include the rules, regulations and enforcements;
 - any antisocial behaviour, such as excessive noise, caused by residents that is observed by the management team or reported to them will be actively managed by the on-site General Manager and security staff.
 - the operator will employ a 'good neighbour policy' to ensure the PBCL residents understand expectations about noise and anti-social behaviour, and to reassure local people that concerns about anti-social behaviour will be listened to and steps taken to address them.
- Community liaison:
 - on-site staff will actively seek to be part of, and work with, local groups to become a familiar face within the community;
 - a formal complaint and incident procedure to the management company.
- Security
 - CCTV cameras in and around the building will be fed back to the management office to allow monitoring of incidents and potential incidents 24/7;
 - there will also be an electronic access control system to prevent unauthorised access into the building; and
 - the lifts will have access control fitted to restrict use of the lifts to the management team and tenants only.
- Tenancies
 - Where tenants breach the agreement, there will be escalating levels of enforcement which will include a face-to-face warning followed by written 'final warning' and ultimately a tenancy termination.

411. On account of the above, it is considered that sufficient information has been provided to address the requirements of Policy H16, and that a robust framework strategy is in place to ensure the day-to-day operation of the PBCL accommodation would not cause harm to the amenity of surrounding residents. Through a planning condition, a finalised version of the Operational Management Plan will be required prior to occupation of the accommodation.

Noise and vibration

Plant noise

412. Plant (power, heating and cooling machinery) would be contained within the basement levels of the South Building and the North Building. Both buildings would also contain rooftop plant: at the North Building, there would be ASHPs serving the PBCL communal amenity spaces as well as the commercial/employment units (Units 1 and 2), while at the South Building there would be ASHPs serving the four remaining commercial/employment units (Units 3 to 6). This rooftop plant would be screened behind an acoustic enclosure.

413. A condition is recommended requiring the plant not to exceed the background sound level (LA90 15min) at the nearest noise sensitive premises, and for the specific plant sound level to be 10 dB(A) or more below the representative background sound level in that location, all to be calculated fully in accordance with the relevant Building Standard. The condition is considered sufficient to ensure that the proposed plant will not have an unacceptably adverse impact on existing neighbouring residents or the users of the building.

Public noise nuisance

414. In terms of public noise nuisance from the development for surrounding residents, an Operational Management Plan submitted with the application details how the probable provider, CMS in partnership with Fifth State, would operate the accommodation so as to limit sources of human noise disturbance to neighbours. The outdoor amenity spaces have the greatest potential to cause disturbance to surrounding residents, and as such these will be limited to the following hours of opening:

- 07:00-23:00 all days of the week, including Bank Holidays.

415. The only other potential sources of public noise nuisance are the three proposed business/employment units and the three proposed commercial/community units. Examples include the use of one or more of the commercial units for a café/restaurant function, and any entertainment or music taking place incidental to this function. In terms of the three business/employment units, were one or more of these to be occupied by light industrial uses, noise nuisance could be generated unless mitigation is in place.

416. In order to limit any risk of public noise nuisance, it is recommended that the following opening hours limitations be imposed on the flexible commercial/community uses (i.e. Units 2, 3 and 4):

- 07:00-23:00 Mondays to Saturdays; and
- 07:00-22:00 Sundays and Bank Holidays.

417. In order to limit any risk of public noise nuisance, it is recommended that before any of the business/employment uses (i.e. Units 1, 5 and 6) are occupied for a light industrial use, the internal fit-out shall be adapted to provide a higher level of resistance to the transmission of sound. Furthermore, in the event of any of the units being occupied for light industrial purposes, these hours of use shall apply:

- 07:00-23:00 Mondays to Saturdays; and
- 07:00-22:00 Sundays and Bank Holidays.

418. A separate condition is proposed to control the hours of servicing/deliveries to the three units; these hours will apply irrespective of the units being occupied by an office tenant or a light industrial tenant.

Vibration

419. The site is adjacent to a railway line. The predicted Vibration Dose Values (VDV) within the 'worst case' habitable rooms due to train induced vibration, when calculated and assessed in accordance with the Building Standards, are 0.11 m/s^{1.75} during the day and 0.07 m/s^{1.75} at night. The Vibration Dose Values are thus predicted to comply with the Council's standard requirement of a night-time maximum threshold of 0.13 m/ s^{1.75}.

Odour

420. The application is not accompanied by any extraction details. Preserving the architectural integrity of the proposed development, with its appurtenance-free façade, is considered to be of importance to the success of the development in terms of its townscape role. Thus, it is likely that any scheme of externally-affixed extraction (which would in all probability need to rise up the full profile of the building to terminate at roof level) would militate against an exemplary building design. Accordingly, it is expected that the flexible commercial units, if used for restaurant/café purposes, would contain re-heat facilities rather than full cooking facilities with extracts/exhausts. A fully internalised extraction system would minimise the risk of odour impacts for the residential occupiers above and those residing in surrounding properties. Alternatively, ventilation for a small-scale prep kitchen could be achieved by utilising the soffit of the commercial units and then venting it solely through the ground floor façade.
421. For safeguarding purposes, a condition is recommended requiring details of any extraction and ventilation system to be submitted to the Council for its consideration prior to the installation of any such system.

Design

422. Paragraph 56 of the NPPF stresses the importance of good design, considering it to be a key aspect of sustainable development. Chapter 12 of the NPPF is the key national policy for design. In particular para 134 requires development to reflect local and national design policies, guidance and SPDs. It sets out that outstanding or innovative design should be given significant weight in decision making, and requires development that is not well designed to be refused.
423. Chapter 3 of the London Plan deals with design related matters. Policy D3 promotes a design-led approach to making the best use of land. Policies D4 and D8 build on this, setting out the design principles for ensuring new development makes a positive contribution in terms of architecture, public realm, streetscape and cityscape. Policy HC1 advises that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural detail.
424. London Plan Policy D9 is specifically concerned with tall buildings. The policy contains a list of criteria against which to assess the impact of a proposed tall building – namely locational, visual, functional, environmental and cumulative. London Plan Policy D4 requires all proposals exceeding 30 metres in height to

have undergone at least one design review or demonstrate that they have undergone a local borough process of design scrutiny. The proposed building would, at 70.67 metres above ground level, exceed the 30 metre threshold. It thus engages Policy D9.

425. The importance of good design is further reinforced by Policies P13 “Design of Places”, P14 “Design Quality” and P17 “Tall Buildings” of the Southwark Plan. These policies require all new developments to:

- be of appropriate height, scale and mass;
- respond to and enhance local distinctiveness and architectural character;
- conserve and enhance the significance of the local historic environment;
- take account of and improve existing patterns of development and movement, permeability and street widths;
- ensure that buildings, public spaces and routes are positioned according to their function, importance and use;
- improve opportunities for sustainable modes of travel by enhancing connections, routes and green infrastructure; and
- be attractive, safe and fully accessible and inclusive for all.

426. Specifically for tall buildings, Policy P17 requires:

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

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

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

428. While there are no conservation areas or listed buildings in the vicinity of the application site, the draft OKR AAP does identify buildings of townscape merit and architectural or historic interest nearby. Additional to this, the Christ Apostolic Church immediately to the south of the site is on the Council’s draft

list of Locally Listed Buildings. The draft AAP identifies the site as an appropriate location for a Tier 2 tall building of between 16 and 20 storeys, a Tier 3 building of up to 15 storeys, and a series of buildings reducing in height towards the south of the site.

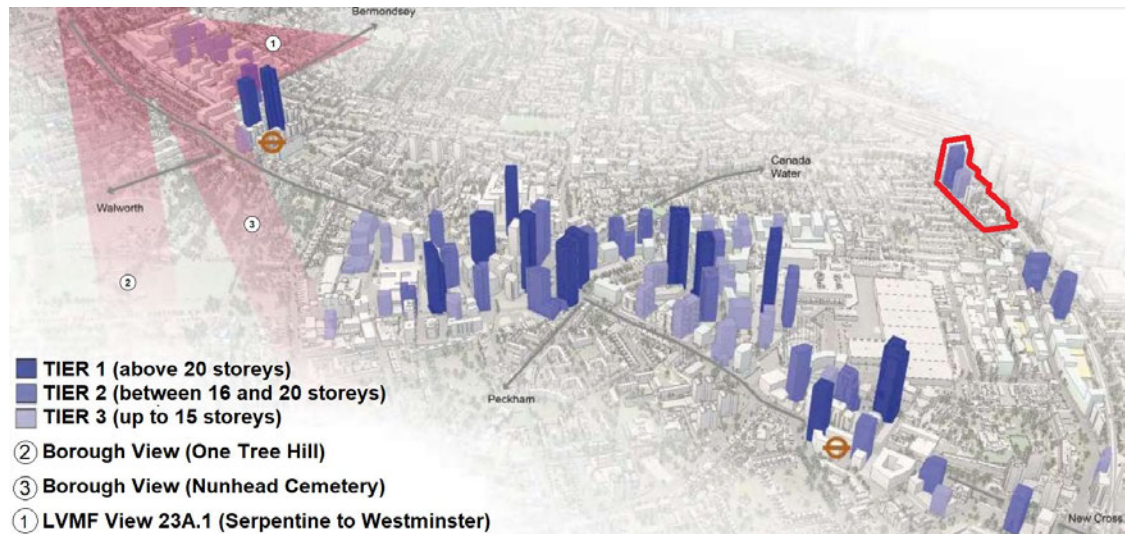


Image 63 (above): *The Stations and The Crossings* strategy from the draft Old Kent Road AAP, showing the distribution of tall buildings across the action area, including two on the 79-161 Ilderton Road site (edged in red), and these tall buildings' relationship to London and borough views.

429. The site benefits from an extant permission, 18/AP/2497, for the construction of a housing-led development comprising a pair of buildings each formed of two blocks linked by a plinth/base element; the pair of buildings would be arranged around a central publicly-accessible open space. This is a material consideration when assessing the design quality of the 23/AP/0387 proposal. In particular the height, scale, and form of the 23/AP/0387 proposal are very similar to the extant consent.

Site layout and public realm

430. Having been previously used for the storage and sale of disused vehicles, the site contains no permanent structures or buildings, and the land is currently in an unkempt state. Consequently the site fails to offer a positive interface with, or activation in relation to, the public realm. More generally, this stretch of Ilderton Road currently lacks townscape legibility: the existing buildings on the western side are arranged inconsistently in relation to the highway, with many set back behind parking courtyards and high walls, and some presenting flank elevations to the street.
431. The linear arrangement of the four proposed blocks conforms to the guidelines given in the draft AAP, is a logical response to the long rectangular shape of the site, and would instate a strong urban edge to the eastern side of Ilderton Road. The siting of the publicly-accessible open space in-between the North and South Buildings also aligns with the site layout suggested in the site allocation. Cutting through the full width of the site, the Pocket Park would help open up views of,

and create a strong visual link to, the vegetated adjacent railway embankment. All of these site configuration moves are logical and contextually responsive

432. In creating a new active frontage along the full extent of the site's 194 metre long Ilderton Road boundary, the proposal responds positively to the Southwark Plan requirement for non-residential uses to activate the street scene. This new active frontage would comprise:

- the extensive glazed façade of the PBCL lobby;
- two commercial units, one positioned at the corner of the North Building and one at the corner of the South Building, both with glazed facades that wrap around the corner to front onto the Pocket Park;
- a third commercial unit, again with an extensive glazed frontage, along the South Building's façade, alongside the entrance to the Shared Ownership block;
- the remaining three employment/business units, one of which would provide a short active frontage along the site's Zampa Road frontage.

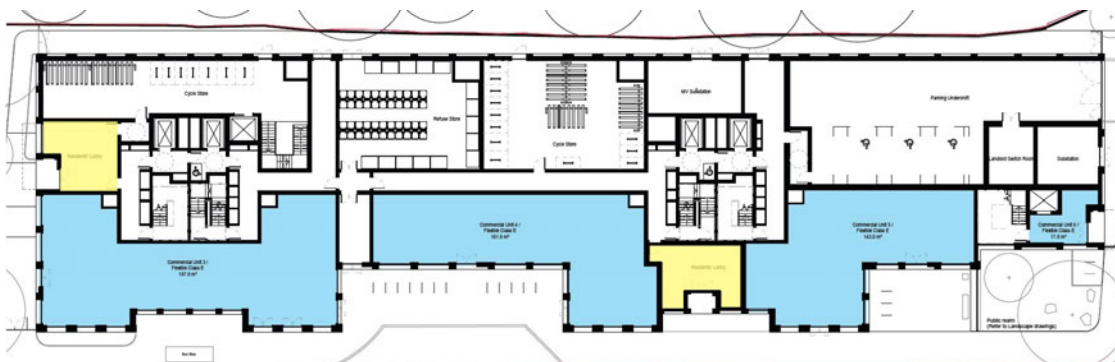


Image 64 (above): Ground floor layout of the proposed South Building, showing the sequence of commercial/business units (in blue) and the residential lobbies (in yellow) that together would create an extensive active frontage.

433. The proposed development would also bring widened pavements (from between 1.7-1.9 metres as existing to between 1.9-3.0 metres as proposed) and at-grade planting beds along parts of the Ilderton Road frontage. Along with the micro-garden and the generously proportioned Pocket Park, the latter delivering a significant net gain in public space and biodiversity, the layout of the site would deliver major public realm benefits.

434. Millwall Football Stadium is located close to the site with the main access into the ground being from Zampa Road. The ground floor layout and landscape of the proposal has been designed in recognition of the close proximity to the football ground with the provision of wider pavement widths and the incorporation of commercial, community and employment/business units at ground floor level facing the street.

435. Cycle stores and ancillary uses have been appropriately located within the rear part of the floorplan of both buildings, with controlled and safe access for residents via gated lanes running alongside the railway embankment. Access to the lanes would be via the Pocket Park, as would access to the lobby of the

Social Rent block. Placing these points of entry off the Pocket Park is intended to promote regular flow of people through the space at all times of the day, which should produce an active and well-used civic space at the heart of the site.

436. In summary, the proposed site layout is well conceived, opening up the majority of the site's Ilderton Road and Zampa Road perimeters with new active frontages. The legible entrances of these ground floor uses, and the broader extensive glazed frontage within which they would sit, would bring transparency to the base of the building. This, together with the generous new Pocket Park and greened footway, would ultimately making for a positive relationship with the public realm.

Height, scale, massing and tall building considerations

437. The application proposes a linear composition of four blocks, the tallest of which would rise to 27 storeys, with the remaining three cascading in height –from 18, to 16, to 10 storeys– towards the southern end of the site. The four blocks would rise from base/plinths of between 2 and 5 storeys. Blocks A and B would be separated by a distance of 18.6 metres, Blocks B and C by 21 metres, and Blocks C and D by 18 metres.
438. Although the proposal is 27 storeys at its highest, thereby constituting a Tier 1 building as opposed to the Tier 2 height promoted in the draft OKR AAP, it is considered to broadly follow the heights guidance. In creating a stepped increase in height towards South Bermondsey station, it would be beneficial in townscape terms and would ensure the most densely developed part of the site has the best public transport access. The lower elements of the proposal to the south take their scale references from the existing residential buildings lining the western side of Ilderton Road, while the proposed southernmost 2- and 3-storey element of the scheme forms an appropriate neighbour to the modestly-proportioned Christ Apostolic Church.
439. Generous gaps would intersperse the blocks, with the sense of separation emphasised by podium- and ground-level greenery, guarding against any visual coalescence when viewed from a distance. The relative heights of the blocks and their distribution across the site is logical and responds appropriately to the context, while also providing a successful 'frame' to the generous new centrally located publicly-accessible open space. Furthermore, as a consequence of the taller blocks being placed on the northern half of the site, the Pocket Park would benefit from optimised daylight and sunlight penetration.
440. With regard specifically to massing, the South and North Buildings would possess a strong urban character and streetscene confidence, with principal frontages set close to the line of the footway. The configuration of the two buildings as paired 'blocks' linked by a set-back podia is effective in breaking down the mass and bulk of development, helping it to read as a sequence of tall and more slender elements, brought together into two pairs. The podia would be complemented by similarly low-rise 'bookends', one to the northern side of the North Building, the other to the southern side of the South Building. These

would facilitate a 'stepping down' of the massing towards the site extremities, completing the composition.

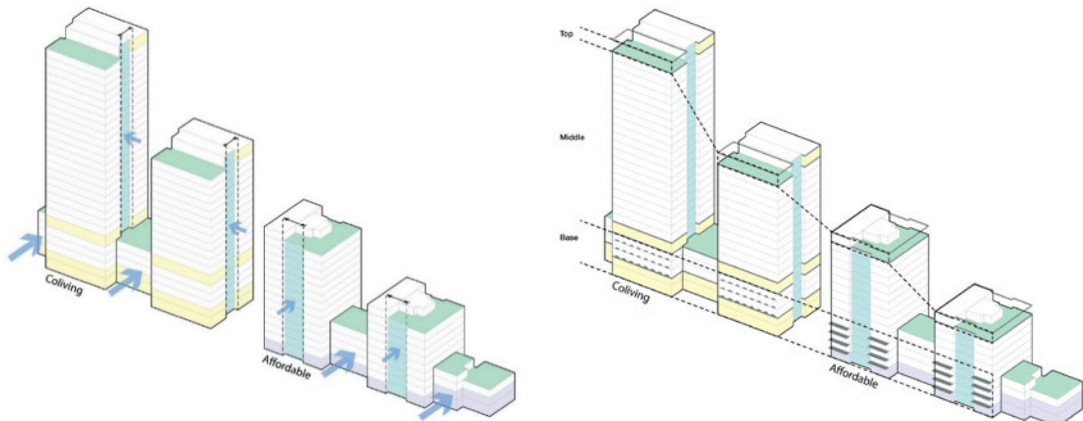


Image 65 (above): Strategy for articulating the massing. **Image 66** (above): Strategy for the elaboration of the facades and tops.

441. As the above diagrams demonstrate, the floorplate of Blocks A, B, C and D would be faceted along two of the edges. In the case of Blocks A and B, the recess would be on the north and south elevations, whereas on Blocks C and D it would form a feature of the east and west facades. This would produce a dynamic interplay between the South and North Buildings in both short- and long-range views. The above-ground communal amenity storeys at Blocks A and B, which would be of an accentuated height, and expressed using double-width modules containing a higher percentage of glazing, would help refine the massing of these blocks. Elaboration, complexity and relief would be brought to the form of Blocks C and D through a mix of:

- projecting winter gardens on the lower storeys;
- corner balconies that lend a feathering effect to the building's edges; and
- wall-to-wall balconies on the recesses.



Image 67 (above): View looking north along Ilderton Road, showing how the four blocks would read as a family, but with A and B differentiated from C and D mainly at the base and crown.



Image 68 (above): View of the North Building, showing the careful modelling of the gridded facade.

442. With regard the façade designs (a detailed assessment of which is given in a later part of this report) the verticality and repetition of the regular module would create a functional composition that reinforces the strongly rectilinear massing of the four blocks. In medium- and long-range views, strong masonry spandrels and parapets would break down the form. In closer views, small exceptions to detailing, such as occasional stringcourses and spandrels at Blocks A and B that continue around the edges of the building and break up the otherwise vertical columns of brick, would engage the eye and moderate the regularity of the form.
443. With regard to the tops of the buildings, the communal amenity facilities on the uppermost floors of Blocks A and B would be exaggerated by the brickwork enclosure above. A non-stepped masonry parapet would wrap the full perimeter of these two roofs, helping both blocks terminate cleanly against the sky. Differently to Blocks A and B, the massing of Blocks C and D steps-up by one storey across a portion of the footprint to house rooftop plant. The lower storey would be open to the air, and expressed as a series of glazed bays framed in masonry. Aside from lending lightness and transparency to these lower blocks, this roof-level portico would emphasise the concept of the four towers stepping-down from north to south. The effect is considered to be successful.



Image 69 (above): view of Blocks A, B and C showing how A and B's crown treatments differ to that of C's (Block D cannot be seen from this vantage point).

444. As assessed in detail in a subsequent part of this report, it is not considered that this proposal, due to its height or scale, would result in any harm to designated London wide or local protected views.
445. In concluding on height, massing and scale, it is important to note that the maximum height of the proposed development, at 90.53 metres above ground level (91.73 metres above Ordnance Datum), is less than the maximum height of the extant scheme. Moreover, the footprints of the proposed buildings are not dissimilar to the counterpart footprints in the consented scheme. While these parallels should be borne in mind, it must also be recognised that the 'tower' elements would be of broader proportions in this planning application than in the extant scheme. To some extent, however, this slightly greater bulk is mitigated by the more generous separation distances between the four point blocks compared with those in the previous scheme. On the whole, the buildings in this planning application have dispositions and envelopes not dissimilar to those in the previous scheme; they would also cohere as a grouping in most short-, medium- and long-range views in a broadly similar way. This should be given some weight in determining the suitability of the height, mass and scale of the 23/AP/0387 proposal.
446. With regard to policy compliance with London Plan Policy D9 and Southwark Plan Policy P17, the following aspects are of consideration:

Landscape contribution

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

Point of landmark significance

448. The site, being very close to South Bermondsey Overground Station as well as a potential major regeneration site at the Surrey Canal Triangle, is considered to be within an area of landscape significance. The development will create a wayfinding node for the station and, together with the Surrey Canal Triangle redevelopment, will form part of a cluster of tall buildings helping to establish the area around the Millwall Football Club as a local destination.
449. While the site's landmark significance is not of the same order as sites at the heart of the Opportunity Area and within the Old Kent Road District Town Centre, its location nevertheless has some significance being situated on one of the principal routes through the Opportunity Area. In stepping down towards the lower scale industrial environments to the south and residential environments to the west, the proposal would help manage the transition in scale from the taller consented buildings on the Surrey Canal Triangle site. The height of the buildings is considered appropriate for this area.



Image 70 (above): View looking northwards from the junction of Ilderton Road and Surrey Canal Road, showing the proposed development in the centre background, behind the five-storey Atar House development, and providing a marker for South Bermondsey station.

Highest architectural standard

450. The proposal would be a high quality new-build scheme, incorporating a pallet of robust and rich facing materials, brought together into a refined and striking architecture through careful detailing. It would deliver high-performance conventional and PBCL housing as well as commercial floorspace. The scheme is designed to achieve an excellent BREEAM rating. The architecture itself is well considered.

Relates well to its surroundings

451. At ground floor level –where large framed glazing and principal entrances to the housing (in particular the PBCL) and flexible commercial and employment units are proposed– the scheme would concentrate the active frontage and main entrances along the Ilderton Road frontages and around the new public space at the heart of the site.
452. The proposed development responds positively to local character and makes a strong and positive contribution to the townscape through the optimisation of a vacant site with no townscape merit, and the delivery of a building of exemplary design quality. In addition, the materials palette, which is predominantly brick, is reflective of the industrial and residential vernacular of the local area.

Positive contribution to the London skyline

453. The development would form part of a cluster of emerging large-scale buildings centred on the Millwall Football Club. The site also stands adjacent to the railway line, which is flanked by a number of recently-constructed tall buildings southwards towards the Old Kent Road high street, reflecting the intended densification of the wider Old Kent Road area, being a designated Opportunity Area.
454. The cumulative impact has been assessed as part of the applicant's HTVIA, which includes consideration of the proposed development within the cumulative context of existing proposed future developments and planning consents. The HTVIA demonstrates that the scale, form and massing of the development would be congruent to the existing and emerging context. By reason of the proposal's careful massing and engaging architectural treatment, its skyline contribution would be positive.

Free-to-enter publicly-accessible areas

455. The application proposes a Pocket Park, to be located centrally on the site at ground level, covering an area of 570 square metres, consistent in size with a publicly-accessible open space proposed by the extant scheme. In addition to the Pocket Park, there would be widened footways supplemented by planted beds together with a 60 square metre micro-garden on the corner of Zampa Road and Ilderton Road. In light of this, the total quantum of new publicly accessible realm created by the redevelopment would be commensurate to the height of the proposed tall buildings, and should be treated as a significant benefit of the scheme.

Mitigated environmental impacts

456. As part of the consideration of tall buildings' suitability, the London Plan requires interrogation of wind, daylight, sunlight penetration, air quality, noise and temperature conditions around the building(s) and neighbourhood. It expects these not to compromise comfort and the enjoyment of open spaces around the building. Other parts of this report assess these matters comprehensively, and

conclude that with mitigation secured, there would be only one location in which a harmful impact has been identified (related to microclimate and wind in particular). Given the limited nature of that impact the scheme overall is considered to be acceptable.

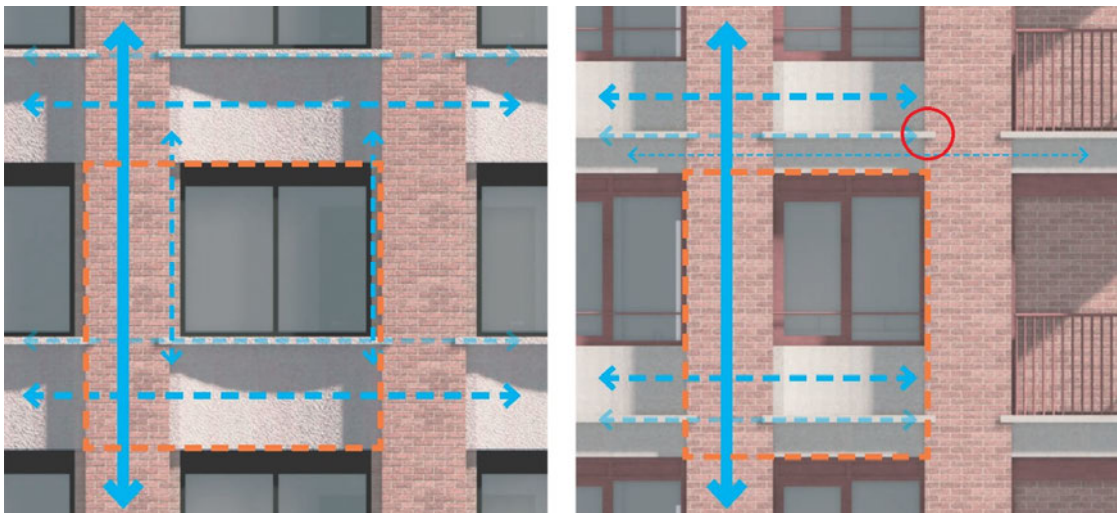
Conclusion on massing, height, scale and tall building considerations

457. In summary, although the heights of the taller proposed blocks would mark a step change in the scale of the immediate area's built form, the proposal as a whole is broadly in line with the draft AAP height strategy for this site.
458. In delivering 605 PBCL units, 120 conventional dwellings and nearly 950 square metres of commercial space while seeking to make efficient use of the land, the proposed development inevitably produces substantial forms. Notwithstanding, the scale and massing of the proposal has taken account of the site's setting, orientation and immediate context, while also having regard to the importance of strengthening the Ilderton Road streetscene and providing multiple publicly accessible spaces on site. The set-back podia and 'bookends', the faceted floorplates of Blocks C and D, the distinctly expressed communal amenity storeys at various points up the profile of Blocks A and B, and the lightly differentiated crowns to all four blocks will make for a composed and refined family of buildings.
459. Overall, and having taken account of the effects arising cumulatively with other existing, consented and planned tall buildings nearby, the development's design meets the policy criteria for a new tall building. However, a significant outcome of a tall building is its visibility and while this is not harmful in itself, the potential effects on the 'receptor' townscape and heritage assets are of special concern. These are discussed in later parts of this 'Design' section.

Architectural design and treatment

460. 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 building fabric, function and composition. Design solutions should be specific to the site's historic context, topography and constraints. They should also respond positively to the context using durable, quality materials that are constructed and designed sustainably to adapt to the impacts of climate change.
461. Key elements underpinning the architectural treatment of the North Building are:
- masonry facade with a mix of brickwork and reconstituted stone;
 - references to the industrial vernacular;
 - on the lower storeys, curved lintels to support the projecting pilasters and mark the double-module bays on the communal amenity storeys; and
 - recessed reveals in lighter brickwork to add depth and emphasise the facade 'layering'

462. The North Building's material palette would be formed principally of brick, in grey and deep red hues, and a mix of light grey and light terracotta masonry. Window and doors would be framed in dark metal, finished with projecting and 'stooled' reconstituted stone cills.
463. Key elements underpinning the architectural treatment of the South Building are:
- masonry facade with a mix of brickwork and reconstituted stone;
 - rectangular façade module with square window to achieve a more domestic feel;
 - recessed corner balconies above Level 04 to 'soften' the building outline; and
 - base and crown expression with full height glazing, framed by brick piers and stone beams.
464. While the South Building's material palette is very similar to the North Building's, the proportions of the façade module and window openings would be more responsive to the domestic function of the building and its internal layouts. Windows would be framed in metal finished in a deep terracotta colour, with the cill located not at the bottom of the window but at the base of the façade module. As with the cills at the North Building, reconstituted stone is proposed with a 'stooled' effect. The deep red spindle enclosures to the majority of the South Building's balconies and winter gardens would provide a refined secondary layer of detailed metalwork. The masonry of the balcony fascias would wrap underneath onto the soffit, ensuring a consistency to the materials palette when the building is seen in views 'upwards' from the street level
465. The materials shown indicatively at this stage are high quality and robust, such that officers have confidence the appearance and architectural integrity of the building would be sustained through its lifespan.



Images 71 and 72 (above left and right): Bay studies of the North Building and South Building modules, showing how they compare. Narrower bays, floor-level 'stooled' cills (which bring greater articulation to the masonry spandrel panels), and different fenestration and framing are proposed at the South Building.

466. The ground floor frontages have been designed to frame a vibrant public realm, with the highest level of detail and finishes applied at the base levels and entrances, for both the residential and non-residential uses. Simple but effective detailing and relief, as well as contrast in colour and material, create a 'middle' to each of the four blocks that is expressive yet composed. With respect to the tops of the buildings, these would be emphasised by the double-height crowns at Blocks A and B, while at the two shorter blocks a one-storey high masonry-framed glass enclosure is proposed. These treatments would be successful in imbuing the building with a clear hierarchy of 'base', 'body' and 'top'.
467. To ensure the proposed buildings provide active frontages, the application proposes a number of flexible commercial/community and employment/business units at ground floor level. The submission includes detailed elevations illustrating how the shopfronts would respect the regular bay arrangement of the host block, and would be dressed with regular horizontal lintels.
468. The character and strength of the proposed buildings relies on their relative simplicity with a calm and consistent approach to the facade modelling, material choices and colour contrast — all of which would ensure the legibility of the development from all distances. The proposal would have a distinctive identity within the Hatcham and Ilderton neighbourhood, but one that emphatically references the industrial character of the area, all without appearing discordant among the nearby buildings, including those recently consented and under construction further to the south.
469. To ensure the texture and interest of the elevational designs are carried through to the as-built scheme, conditions are recommended requiring sample panels of each material (including, in the cases of the bricks, the bond and mortar), as well as samples of the window and door frames.
470. Large scale bay studies have been provided with the submission to demonstrate design quality. Notwithstanding, a full set of detailed drawings will be secured by condition to ensure the delicate qualities and depth of the facades depicted in the application-stage drawings materialise in the as-built scheme. A full scale mock up of the panels on the towers will also be required to be built on site and approved by condition.
471. Overall, and with the abovementioned planning conditions enabling to officers to retain control over the detailed resolution, the proposal would achieve an exemplary quality of architectural design.

Heritage and townscape impact

472. A Heritage Townscape and Visual Impact Assessment (HTVIA) has been submitted in support of this application. The study area for the HTVIA is a 500 metre radius from the site, which was informed through discussions with planning

officers. No conservation areas or listed buildings fall within this radius, but two buildings on the draft local list do.

473. The 'townscape' element of the HTVIA considers the impact of the proposed scheme from six different viewpoints in the surrounding area, and includes consideration of cumulatives. The two draft locally listed buildings mentioned above are located within the 500 metre radius, but neither are visible within the views.

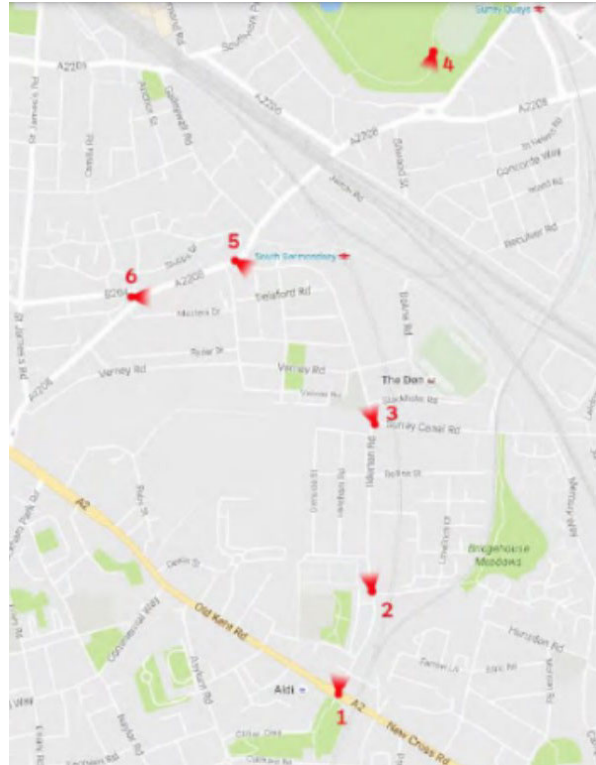


Image 73 (above): Map showing the six viewpoints assessed in the HTVIA.

Townscape views

474. 14 consented and under-construction planning permissions were included in the cumulatives model, as shown in the below image:

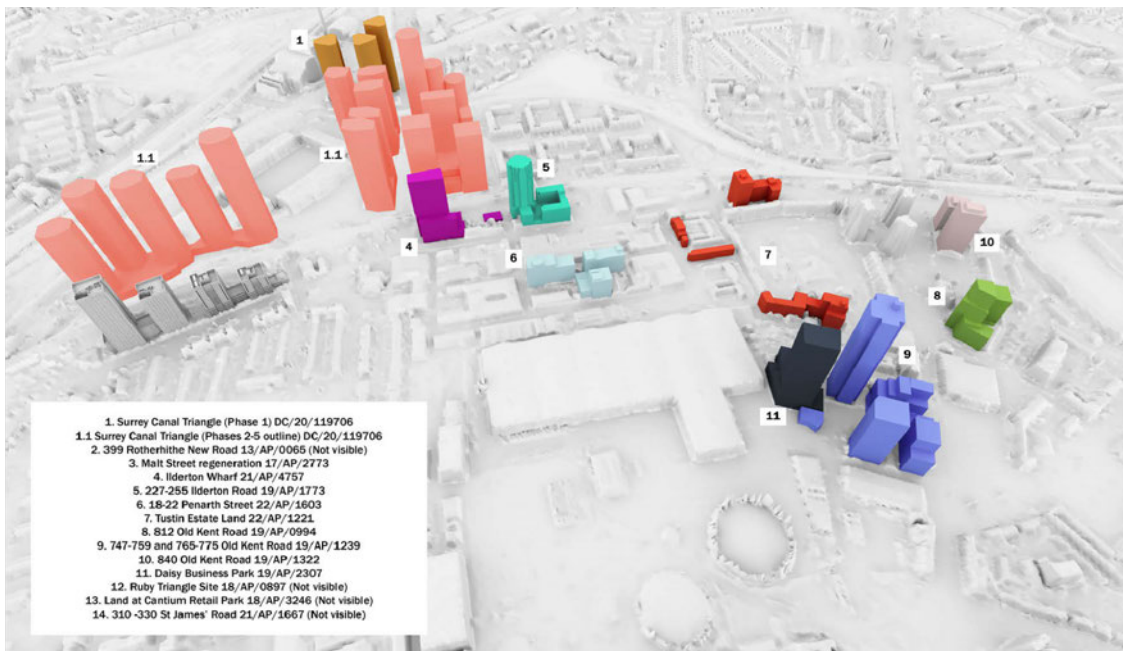


Image 74 (above): Cumulatives model, in which the site is visible towards the left hand side of the image (shown in grey), with each 'cumulative' numbered.

View 1 - Looking north from the southern side of the Old Kent Road at its junction with Ilderton Road

475. The proposal would not be visible in this view in either the summer or winter.

View 2 - Looking north on Ilderton Road at its junction with Canterbury Industrial Estate and Hornshay Street

476. The development would not be visible at all in the summer view, hidden behind a mature street tree. In the winter view, it would be glimpsed behind the tree. The proposed material palette and level of detailing proposed would ensure that the building sits comfortably in the far distance with brick being the predominant material. Due to the quality of the architecture proposed the development would enhance the view as well as provide a wayfinding marker for South Bermondsey Station.

View 3 - Looking north at the junction of Ilderton Road and Surrey Canal Road

477. The proposed view shows the development in the far distance behind the modern development already constructed on the western side of Ilderton Road. It also shows the relationship between the proposal and the Ilderton Road Primary School. Similar to the previous view, the use of brick and the quality and variety of detailing means that the proposed development sits comfortably within the context of other brick buildings – particularly the primary school. The tower provides a marker for the station and the quality of the architecture positively enhances the view.

View 4 - Looking to the south from Southwark Park

478. In this view the proposed development can just be glimpsed behind the trees to the right of the image. This view shows that even in the winter the proposed development is barely visible beyond the mature trees and existing urban form that surrounds the Grade II registered Park.

View 5 - Looking west from the junction of Ilderton Road and Rotherhithe New Road

479. The proposed development would appear centrally in this view, stepping down to the north and south. It would provide one of the best positions to fully appreciate the quality of the detailing, materials and form of the buildings. It would also provide a key marker for the station and serve as a symbol of the area's regeneration. In relation to the travellers' site, it would provide a high quality backdrop with the North Building stepping down from 27 to 5 storeys on the boundary, in order to provide an intermediary and transitional block between the tower and the single storey travellers' homes.
480. When having regard to the planned regeneration in the area, which includes the Surrey Canal Triangle redevelopment (Phases 2-5 outline), the cumulative condition will lessen the effect of the proposed development by itself, as it would

then be seen with the backdrop of significant tall development covering a wide area beyond the railway embankment.



Image 75 (above): View 5, during the summertime, in the existing condition



Image 76 (above): View 5, during the summertime, in the 'proposed plus cumulatives' scenario.

View 6 - Junction of Catlin Street and Rotherhithe New Road

481. The view is dominated by the road in the foreground and the mature street trees. These elements, even in the winter view, provide considerable visual screening between the viewing position and the site such that the proposed development, in both winter and summer views, will have a minimal townscape effect.

Borough views

482. The site is not within any Borough View corridors or their wider consultation areas.

London Strategic views

483. The London View Management Framework (LVMF) (March 2012) identifies a number of strategic views that are sensitive to change, and require careful management if they are to be protected and enhanced. The types of strategic view are: London Panoramas; Linear Views; River Prospects; and Townscape Views.
484. With regard specifically to the London Panoramas, for those where the viewpoint is located in north London, the view splay takes in a wide panorama of the city centre and Southwark forms a distant backdrop to these views. These views are: Alexandra Palace (View 1), Parliament Hill (View 2), Kenwood (View 3), and Primrose Hill (View 4).
485. The viewpoints mentioned above are all located at a distance of 9 kilometres and farther from the subject site. The changes to the visual character of the townscape and views resulting from the proposed development would not be discernible in the backdrop to the City and are at such a distance as to have no bearing on the silhouette of key City landmarks, blending into the general urban context.

486. The site does not fall within any of the Linear Views or River Prospects.
487. With regard to the Townscape Views, only one is sensitive to development at the 79-161 Ilderton Road site. This is View 23A.1 (from the bridge over the Serpentine, facing east towards Westminster), the Wider Setting Consultation Area of which the site sits 1.6 kilometres beyond. The visibility of the proposed development has been tested; it would not be in any way visible in the view.

Non-designated heritage assets

Former Baptist Church, 163 Ilderton Road:

488. The proposed development mediates positively towards this locally listed building, as the southernmost element of the scheme steps down to a part 2- and part 3-storey height at the closest point to 163 Ilderton Road. The proposal would block some views of the asset potentially achievable from the platforms of South Bermondsey Overground Station, but these are not the principal experiences of the Church, and therefore have very limited impact on the building's significance. Overall, the significance of the Church would not be harmed by development within its setting, as proposed in this application.

209-225 Ilderton Road:

489. The proposed development would be partly visible in the backdrop to this terrace of nine two- and three-storey buildings, but only when the terrace is viewed obliquely as part of a northwards view along Ilderton Road. With the cumulative effect of the recently consented 25-storey development at Ilderton Wharf also appreciable –and more dominantly so– in this view, the proposed development would not feature conspicuously. Rather, it would form part of the urban backdrop to these locally listed buildings, with a neutral effect on their significance.

Conclusion on heritage and townscape impact

490. The closest conservation areas and listed buildings are all located more than 500 metres from the site, and therefore their special character would not be affected by the proposed development. With regard to buildings of townscape merit and/or buildings on the Council's unadopted local list, two have been identified as being potentially sensitive to development at the 79-161 site. However, as the assessment above sets out, these would not be adversely impacted by the proposed development, the impact on their significance being neutral in one case and very limited in the other. For these reasons, the development would comply with Policies P19, P20 and P26 of the Southwark Plan.
491. In conclusion on townscape impacts, the proposed development would not have any impact on the designated London and Borough views. In respect of the six local townscape views, the impact is not considered to be harmful. Indeed, in many views it is considered to be beneficial.

Conformity with the Hatcham and Ilderton Roads Design Code

492. As mentioned in the introductory parts of this report, the site is located within the area covered by the Hatcham and Ilderton Roads Design Code, which sets targets and aspirations applicable to all new development within this part of the Opportunity Area. Although the Code is only a draft guidance document at present because the AAP is not yet adopted, the applicant has supported their planning submission with a note explaining how the proposal meets most of the principles of the Code. An example from each of the themes is provided below:

- Sustainability: Most of the proposed balconies would be dual aspect, with all south facing balconies being inset to provide a degree of solar shading;
- Nature: Facilities for food growing would be provided on the roof terraces;
- Movement: Widened footways would be provided, framed and activated by active ground floor frontages;
- Public Open Space: Robust materials referencing the area's industrial character, including some locally upcycled/reclaimed low carbon materials, would be used in the fencing and some of the micro-garden furnishing (i.e. Corten steel);
- Identity and Character: Proposed fenestration and materiality have been designed to express the function they enclose (larger openings allow natural light to penetrate deeper business units, while the residential units would be served by domestic-sized openings);
- Land Use: Ground floor commercial and employment/business units would be designed to achieve a minimum 4 metre clear height to the underside of the ceiling; and
- Homes: Private balconies to lower levels dwellings, fronting onto Ilderton Road, are designed with solid panels to increase privacy.

493. The effort made by the applicant to embrace the principles of the Design Code, in turn helping to clearly define and enhance the unique character of the area, is welcomed. It is also in accordance with the broad objectives of Southwark Plan Policies SP2 and P15 in seeking to enhance local distinctiveness and deliver the highest quality urban design.

Inclusive access

494. Policy D3 of the London Plan states that measures to design out crime should be integral to development proposals and be considered early in the design process. Developments should ensure good natural surveillance, clear sight lines, appropriate lighting, and logical and well-used routes. Policy P16 of the Southwark Plan reinforces this and states that development must provide clear and uniform signage that helps people wayfind and effective street lighting to illuminate the public realm.

495. The various inclusive access measures within the proposal would 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;
- colour contrast to be provided to denote level areas from those with a gradient;
- reflective surfaces, internal finishes and lighting levels and sources to be designed to reduce disturbance for people with sensory disabilities;
- manifestations to glazed doors and windows where necessary;
- lift access to be provided to all levels within the building, with all lifts to include tactile information, audible announcements and adequately sized landing space;
- 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 (pictograms will be used wherever possible and text and signs will be in accordance with the Joint Mobility Unit Sign Design Guide).

496. The proposal is ambitious in its inclusive design principles creating a convenient and welcoming building and new public spaces that can be entered, used and exited safely, easily and with dignity for all.

Designing-out crime

497. Policy D11 of the London Plan and Policy P16 of the Southwark Plan require development proposals to reduce opportunities for crime, and create and maintain safe internal and external environments.

498. Mentioned throughout the application documents are the various 'passive' ways in which opportunities for crime have been designed-out. Examples include:

- creating well lit routes and spaces with good sight lines, creating opportunities for natural surveillance in so doing;
- designing-out alcoves, secluded areas and other spaces for anti-social behaviour;
- designing all cycle store room to be open-plan, well-surveilled and secure; and
- in the PBCL, providing two access control points (secures lines) before entry into the circulation spaces, as a fail-safe against unauthorised access in the event that the concierge happens not to be at the reception desk.

499. The Security Needs Assessment that accompanies the planning application uses an established methodology to identify the predominant sources of current crime around the site, and finds these to be anti-social behaviour and violence and sexual offences. This can in part be attributed to the site's close proximity to Millwall Football Club, which has a documented history of hooliganism and violent clashes between fans. In response to these risks, the report describes a suite of security controls including design, operational and technical measures to reduce the likelihood and impact of the identified security risks in a pragmatic

and proportionate manner, while supporting the design and operation of the building.

500. Key 'active' measures to be provided within the proposal, as committed to in the Security Needs Assessment, include:

- accessible apartment windows (at ground and within 3.5 metre of ground, such as those on the podium levels) tested and accredited to PAS24:2016 on 100mm restrictors;
- electronic access control to all building entrances;
- electronic access control to the gates leading to the rear access routes for cycle and refuse stores;
- fixed-view vandal-resistant external cameras outside all building entrances and to the pocket park;
- suitable illumination to all public spaces around the buildings, servicing areas, recesses and doorways; and
- shrub planting that is no higher than 1.0 metre and is not of a dense nature, and tree canopies that are no lower than 2.0 metres from the ground.

501. The Metropolitan Police's Secure by Design Officer has assessed the proposal and is confident that certification can be attained. To ensure certification is ultimately achieved, the imposition of a two-part 'Secured by Design' condition is recommended.

Design Review Panel

502. In compliance with the requirements of London Plan Policy D4, the proposals were subject to a multiple-stage design scrutiny process from planning, urban design and conservation officers. This scrutiny process ran throughout the pre-application phase and the planning application stage. Examples of how the scheme's design was positively progressed through collaboration with officers include:

- refining the massing of the North Building;
- developing the architecture of both buildings, including their crowns and base storeys;
- the omission of canopies and fins from the elevations of the North Building;
- the optimisation of the Ilderton Road frontage for active uses;
- the integration of a second stair core for fire safety purposes.
- developing the residential accommodation to provide optimised mix and quantum of housing, and optimal layouts;
- re-configuring the Pocket Park landscaping; and
- introducing wind mitigation features.

503. It was ultimately decided that, given the previous/extant consent on the site, and because the proposed development was broadly within these parameters, it was not necessary for the scheme to be fully reviewed by the Council's independent

Design Review Panel. It is also relevant that the proposal was subject to the scrutiny of the Old Kent Road Community Review Panel, the feedback which is detailed in a later part of this report. Officers are satisfied that the requirements of Policy D4 have been met.

Conclusion on design

504. This is a carefully conceived scheme providing a pair of engaging buildings of an appropriately urban character, set within new high quality public realm sized commensurately to the scale of the buildings.
505. With regard to the height and massing of the proposal, the extant planning permission (18/AP/2497) is important because it establishes in principle the acceptability of four blocks arranged in a linear formation, stepping-up northwards to a maximum height of 93.35 metres AOD. An additional consideration is that the application site is situated within an opportunity area and a location where tall buildings are considered to be appropriate. With the height of the tallest proposed block not exceeding that of the extant permission and the three other blocks not markedly taller than their counterparts, and having been carefully tested in the townscape views, it is concluded that the proposed development would neither appear overly dominant nor harm important aspects of the local townscape character. It would achieve high quality architecture and relate well to surroundings at the ground floor level. Overall, the height, scale and massing of the proposal can be accommodated without undue harm to the established townscape.
506. Blocks A and B would share a common architectural language, as would Blocks C and D. Intended only to be subtle, the differentiation between the two pairings would be achieved through variations in the materials, colour, architectural fenestration and detail. Notwithstanding these differences, a strong rhythmic quality would run through the development as a whole, with features common to both buildings being articulated window surrounds, projecting string courses, and the use of warm and tactile brickwork. Throughout, robust and high quality finishes are proposed. To ensure high quality execution, sample materials, detailed section drawings and mock panels will be required by condition.
507. Having applied the statutory tests as set out in the Planning (Listed Buildings and Conservation Areas) Act 1990 and the requirements of the NPPF, it is considered that the proposal would conserve and enhance the significance of designated and non-designated heritage assets, and would make a positive contribution to the wider townscape character. The proposed development would also make efficient use of land, optimise density and contribute towards creating beautiful and sustainable places, in accordance with NPPF paragraphs 122 to 125, London Plan Policies GG2 and D3, and Southwark Plan Policy P18.
508. Inclusive design and crime minimisation considerations have all been resolved to an acceptable level of detail.
509. For the reasons given above, it is considered that an acceptable quality of design would be achieved.

Public realm, landscaping and trees

510. London Plan Policy G7 and Southwark Plan Policy P61 recognise the importance of retaining and planting new trees wherever possible within new developments. London Plan Policy G5 requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
511. As set out in the draft Old Kent Road AAP, all new development must deliver 5 square metres of public open space per proposed dwelling. As prescribed by the draft AAP indicative masterplans, sites are identified as providing public open space either:
- a) all on site; or
 - b) some on site, some off-site; or
 - c) all off-site.
512. In scenario b), the total quantum of on-site public open space proposed by the planning application can be deducted from the 5 square metre per dwelling financial contribution requirement. Where a site is required to make a public open space financial contribution, the £205 per square metre tariff specified in the Council's S106 and CIL SPD should be applied.

On-site public open space

513. The proposed development incorporates two areas of on-site public open space. These are the 570 square metre Pocket Park, located at the heart of the site, and the 60 square metre micro-garden, located at the junction of Ilderton Road and Zampa Road.
514. The concept for the Pocket Park is 'the Secret Garden': a richly planted and intimate space configured as a series of 'islands' to help foster a range of activities, all framed by numerous trees, of which four are to be large-scale specimens to give the environment an established quality from first opening. Strong lines of evergreen and sensory planting would create 'rooms' with different play opportunities, including a slide, balancing beams, spinning bowls and stepping stones. There would also be a requirement for wet and sand play as per policy AAP10. Alongside the play function, the Pocket Park would provide formal and informal seating, including a raised deck and stone terraces, where older children and adults can meet and dwell. The design principles and general configuration of the space are well thought through, with an appropriate materials palette and a good mix of hard and soft surfaces.
515. A perforated steel screen would separate the Pocket Park from Ilderton Road. The design, inspired by botanical forms, is intended to provide visual links between the street and the garden, while also providing mitigation against winds

at pavement level. The design would also integrate a controllable gate at the far southern end to manage access from the street into the garden.

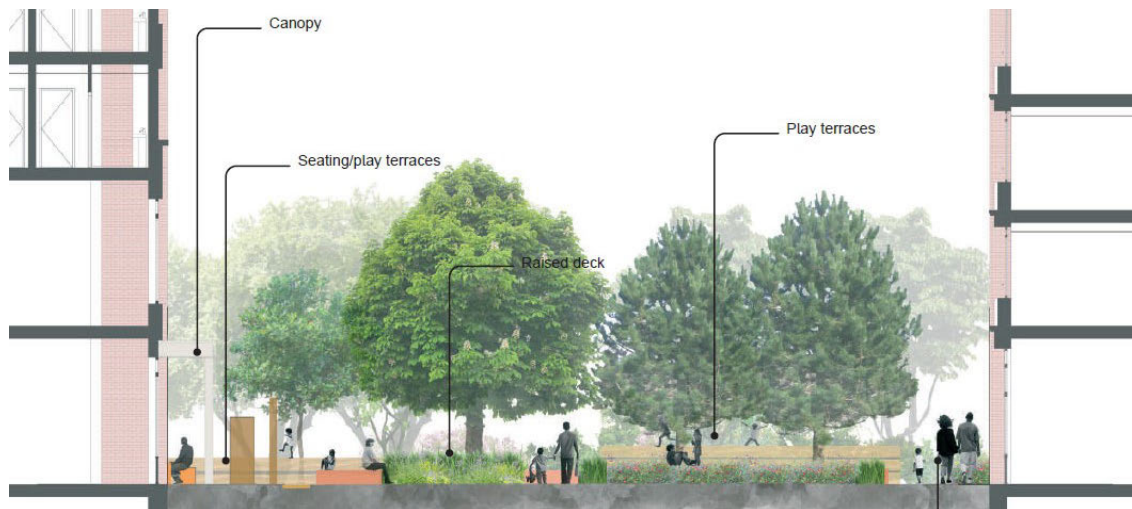


Image 77 (above): Indicative north-to-south cross section through the Pocket Park, showing the extent and density of tree and planting cover.

The micro-garden would provide passers-by with a place to stop and sit for a short time, as well as opportunities for incidental children's play amongst the planting and grasses. The garden would contain a large-scale street tree, anchoring the corner of the site, coupled with a smaller naturalistic tree. A perforated/latticework brick wall is proposed along the micro-garden's northern edge, as a means of:

- mitigating impacts of the prevailing winds;
- framing, and giving a strong edge to, the corner greenery; and
- providing a degree of separation from the adjacent forecourt to the commercial unit, preventing a sense of perceived ownership by the commercial unit and helping to establish the garden as a standalone green space.



Image 78 (above): Cross section through the micro-garden, showing the large-scale tree bedded in the shrubbery and grass.



Image 79 (above): View towards the micro-garden, the perforated wall visible in the centre ground.

516. The 630 square metres of dedicated publicly-accessible open space meets the aspirations, in terms of quantum and distribution across the site, of the Southwark Plan and draft AAP allocations. Final design and management details will be secured through a combination of planning conditions and Section 106 obligations.

Public realm adjoining the site

517. Small areas of extended footway around the base of the building would be delivered as part of the proposed development, all of which would be finished in materials consistent with the adopted footway so that the ownership line would be imperceptible. These widened sections of footway would be offered up for adoption once constructed. A number of at-grade beds are proposed alongside sections of the footway, helping to green the street. This would all make for a more pleasant and spacious pedestrian experience

Off-site (Old Kent Road Opportunity Area) public open space

518. The proposal hereunder consideration would deliver the equivalent of 322 dwellings, generating a public open space requirement of 1610 square metres.
519. As the planning application would provide 630 square metres of on-site publicly-accessible open space, this can be subtracted from the 1610 square metres required by the draft AAP. With the 630 metres deducted, the quantum not provided on site is 980 square metres. Applying the £205 multiplier, this generates an in-lieu contribution of £200,900, which the applicant has agreed to pay prior to implementation. These monies could go towards repaving the asphalt pavement on the western side of Ilderton Road to include tree planting; this would help to reduce air and noise pollution, achieve greenfield run off rates, and encourage habitat creation.
520. The extant planning permission secured a contribution of £25,000 towards the ongoing maintenance of a close-by public space, Pat Hickson Park, located very approximately 100 metres to the south of the site. This contribution was required in recognition of the increased use of the park by the future residential occupiers of the development, as well as the employees of the proposed commercial units, some of whom are likely to eat lunch in the park.
521. It is considered appropriate for the new proposal hereunder consideration to, as per the extant planning permission, make a contribution towards the ongoing upkeep of Pat Hickson Park. Accordingly, £25,000 is to be secured in the 23/AP/0387 Section 106 Agreement. The monies will only become available for usage by the Council's Parks Team once current maintenance responsibilities (which fall to Network Rail) cease in mid-2026. This will broadly coincide with the opening of the 79-161 Ilderton Road development.

Landscaping

522. The planting design aims to create a distinct garden character to the different parts of the development: the 'secret garden' Pocket Park, the Ilderton Road frontage, the 'wilder' east edge, and the rooftop gardens.
523. Typically, the Pocket Park planting would be shade tolerant and robust to enable them to thrive under the trees and within the play space. The Ilderton Road frontage planting would be drought tolerant and sun-loving, similar to the rooftop planting. The mixes proposed, which are indicative at this planning application stage, contain a significant amount of evergreen planting to help provide a degree of wind mitigation to the different spaces.
524. The landscaping proposals are considered to be locally specific and mindful of climate change, with the indicative specification having appropriately privileged species for their hardiness and minimal maintenance needs. Through planning conditions, the applicant will be required to install the soft landscaping to the agreed specification and maintain it in the long-term. Its enduring positive contribution to the greening of the site and local area can therefore, be assured.

Trees

525. There are presently no trees within the red line boundary of the site.

526. The applicant's Tree Survey and Arboricultural Impact Assessment identifies 10 arboricultural features on land adjacent to the site: 9 individuals and 1 tree group. Of these, a self-seeded Category U Sycamore is earmarked for removal. All other trees would be retained, but their canopies are to be reduced to facilitate the development. None of these trees are subject to a Tree Preservation Order (TPO). These trees are located on Network Rail operation land, with dispensation for works, including tree removal under the remit of maintenance of nationally important infrastructure. The removal of T1 and the pruning works to the remaining trees would have no negative impact on amenity. The Council's Urban Forester has appraised the Arboricultural Impact Assessment and Method Statement, and has deemed them acceptable.

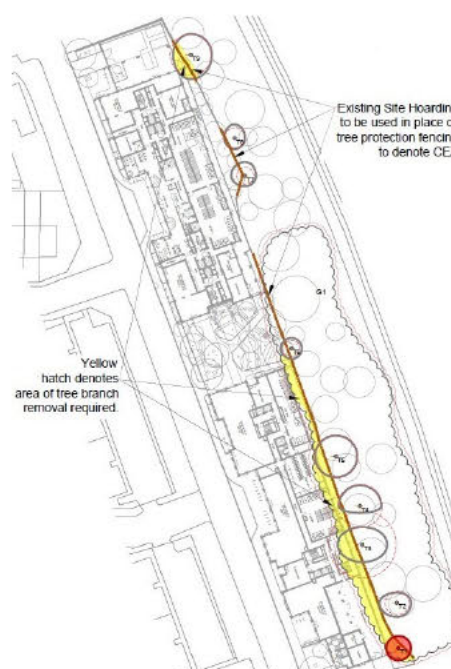


Image 80 (above): Arboricultural plan, with T1 shown in red.

527. This planning application proposes to plant a total of 25 new trees within the red line boundary of the site. The indicative details suggest that a variety of native species and tree sizes would be included. Although the tree selection at this stage is indicative only, the applicant envisages a mixture of fruit trees, Pine, Holm Oak, Sweet Gum, Holly, Birch and Witch Hazel at ground level with a good

distribution of species, genera and family groups so that no one species is dominant. A mix of fast and slower growing species with a range of carbon storage potential is proposed. The detailed drawings show tree canopy extents at maturity (25 years) and any conflicts with built structures, including the below-ground service trenches that will run north-to-south through the Pocket Park. The Council's Urban Forester has assessed these proposals and considers them to be well thought through and deliverable.



Image 81 (above): Site layout showing the arrangement and variety of the 25 trees proposed. Purple and orange indicate large/medium sized trees, whereas blue and red indicate smaller naturalistic or feature trees.

528. Additional to the 25 at-grade trees, a number of trees are proposed to be planted within the high-level gardens serving the PBCL and conventional (Class C3) housing occupiers. These trees will be limited in size, being mainly multi-stem specimens in raised planters. They will nevertheless provide amenity value to the residents and some biodiversity benefit.
529. Sufficient soil volumes, long-term management and watering schedules are paramount to establishing trees within the urban environment. The applicant is currently working through the technical and construction design with GreenBlue Urban and Deeproot Silva Cell System, and has confirmed that tree pit designs will use the GreenBlue Urban Target Soil Volumes calculator to guide the detail. Final details are to be secured through planning conditions and obligations.
530. Overall the proposal presents a significant uplift in tree cover for the site, which should be treated as a major benefit of the planning application.

Conclusion on public realm, landscaping and trees

531. The scheme would make a generous and high quality public realm offer, the centre piece of which would be a new park open to the general public on a 24/7 basis. Elsewhere at ground level, a micro-garden and numerous planting beds are proposed, as well as enlargements to the footways along the site's western and southern boundaries. A total of 25 new trees would be planted, making a major contribution to the Opportunity Area's green infrastructure.
532. Having reviewed the landscaping proposals, the Council's Urban Forester considers the indicative materials and specifications to be of a high quality, with appropriately-selected trees and other soft planting. Many of the spaces would be suitably framed by active frontages and/or accommodate incidental play

facilities. This will make for a rich, vibrant and attractive publicly-accessible realm.

533. Through the Section 106 Agreement, two contributions will be secured. One, of £200,900, will be put towards the delivery of off-site (Old Kent Road Opportunity Area) public open space. The other, of £25,000, will be used to support the ongoing maintenance of the nearby Pat Hickson Park.

Green infrastructure, ecology and biodiversity

534. Policy G5 of the London Plan states that urban greening should be a fundamental element of site and building design. It requires major developments that are predominantly commercial to achieve an Urban Greening Factor (UGF) score of 0.3 and those that are predominantly residential to achieve a score of 0.4. The scheme proposed by 23/AP/0387 falls within the latter category.
535. The new Environment Act 2021 introduced a requirement for planning applications to deliver biodiversity value 10% in excess of the pre-development biodiversity value of the on-site. This is known as 'Biodiversity Net Gain' (BNG). The Act requires planning authorities to secure the BNG value delivered by the development through an appropriate planning mechanism for a minimum duration of 30 years. These requirements will become mandatory for all applications submitted from January 2024 onwards.
536. Notwithstanding that this planning application would not be subject to the mandatory requirements because it pre-dates January 2024, the protection and enhancement of opportunities for biodiversity is a material planning consideration.
537. London Plan Policy G6 requires development proposals to manage impacts on biodiversity and secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process. Southwark Plan Policy P60 seeks to enhance populations of protected species and increase biodiversity net gains by requiring developments to include features such as green and brown roofs, green walls, soft landscaping and nest boxes. Southwark Plan Policy 59 requires major development to provide green infrastructure with arrangements in place for long-term stewardship and maintenance funding.

Urban greening

538. The proposal would achieve a UGF score of 0.40 through a combination of these principal elements:
- 664 square metres of flower-rich perennial planting;
 - 873 square metres of 'larger' tree coverage (trees planted in connected pits with soil volumes to at least two thirds of the projected tree canopy);
 - 177 square metres of 'smaller' tree coverage (trees planted in connected pits with soil volumes less than two thirds of the projected tree canopy); and

- 818 square metres of intensive green roof with substrate of minimum settled depth of 150mm.
539. This is deemed to be the maximum achievable UGF score given the following constraints:
- providing functional pedestrian / maintenance uses requires the provision of hard surfaces;
 - soil conditions result in poor drainage at ground floor and prevent rain gardens;
 - roof areas have been maximised for use of services equipment to deliver the required Energy Strategy, resulting in reduced possibilities of green/brown roofs on the tops of the buildings.
540. The score of 0.4 would meet the minimum policy requirement, and as such should be treated as a benefit of the scheme. A two-part condition will be imposed to ensure the development is built-out to achieve the 0.40 UGF.

Ecology

541. Along with thirty non-statutory designated sites, there are two statutory designated sites within a 2 kilometre radius of the development site, one of which –the South Bermondsey Railway Embankment SINC– runs directly alongside the application site. The SINC, by reason of its proximity, has the potential to be impacted by the redevelopment of the application site.
542. An Ecological Appraisal accompanies the planning application. It notes that the site comprises mixed scrub and ruderal vegetation, distributed around areas of hard standing. The Ecological Appraisal also notes that Japanese knotweed has historically been present across a large portion of the site, and on the eastern (railway land) side of the common boundary. During the on-site survey, above ground growth of Japanese knotweed was observed towards the northern end of the eastern boundary, but the extent of the knotweed is likely to be greater than this.
543. The on-site flora provides habitats for invertebrates, reptiles and nesting birds. With regard to bats, no records were found within the site boundary.
544. The Ecological Appraisal makes recommendations for suitable vegetation clearance in order to prevent disturbing and damaging nesting birds, and for creating suitable lighting so as not to disturb and disrupt the already established path of commuting and foraging bats. To ensure these are adopted, in turn help protect local ecology, the following conditions are proposed:
- a pre-occupation external lighting strategy condition that makes express reference to a bat sensitive specification; and
 - a compliance condition requiring a sensitive habitat clearance of the site between the months of March and October (when reptiles and amphibians are active), in full accordance with the methodology given at Section 5 of

the submitted Ecological Appraisal, with the process to be overseen by a suitably qualified ecologist.

545. Two conditions have been recommended by the Council's Ecologist, one for nesting features to be incorporated within the fabric of the proposed building, the other requiring the eradication or long-term management of the Japanese knotweed.
546. With regard specifically to the adjacent SINC, the Ecological Appraisal concludes that no direct impacts would result from the proposed development. However, the Appraisal recognises that indirect impacts could occur (such as through noise, lighting, or air pollution). Therefore, a Construction Environmental Management Plan (CEMP) condition is recommended, to ensure the adoption of all good practice pollution prevention measures and industry standard methodologies.
547. With the above conditions secured, the ecological impacts of the development would be mitigated, in compliance with Policies P59 and P60 of the Southwark Plan.

Biodiversity

548. The applicant's Biodiversity Net Gain Assessment found the site to have a baseline score of 3.68. This is attributable mainly to the mixed scrub and ruderal vegetation, and the mosaic habitats it supports, that has grown up on the site in recent years. While the proposal has sought to maximise biodiversity through the provision of biodiverse green roofs, trees, planters and shrubbery, these would be traded for the existing flora. As a consequence, the biodiversity score of the site would reduce to 0.65 habitat units, representing a reduction of 82.43% on the baseline.
549. The loss of biodiversity (3.03 units) is to be offset via a financial contribution of £85,000. This is based on the industry standard, which puts the value of a biodiversity unit at £20,000, but with a London weighting. Southwark Park is the closest habitat bank to the application site; therefore, the 3.03 units are likely to be invested here to support and grow habitats. The applicant recognises that the £85,000 contribution is necessary in planning policy terms, in spite of BNG not being a mandatory requirement due to the submission date of the application, because it would secure an industry-recognised level of mitigation for the loss of biodiversity units, as is required by London Plan Policy G6 and Southwark Plan Policy P60.
550. Additional to the financial mitigation for the biodiversity net loss, a planning condition is recommended requiring the submission of biodiversity audits at various stages across a 30-year duration commencing upon first occupation of the development. The purpose of these reports is to ensure the new habitats delivered as part of the development are managed and sustained appropriately post-permission.

551. In summary, the applicant has maximised opportunities for biodiversity within the proposal and, while a biodiversity net loss would result, this is unavoidable given the vacant brownfield nature of the land. Adequate mitigation has been secured by way of a financial contribution towards off-site habitats nearby. Furthermore, the biodiversity of the site will be monitored for a 30-year period through a planning condition.

Conclusion on urban greening, ecology and biodiversity

552. The Council's Ecologist and Urban Forester have reviewed the application information and deemed the proposal to be satisfactory. The Ecologist welcomed the provision of urban greening, recommending conditions to secure the provision of eighteen Swift nesting bricks and six bat bricks/tubes within the building fabric to support local biodiversity, along with a BNG offset contribution and biodiversity audits for a 30-year period. A two-part condition will be imposed at the request of the Urban Forester to ensure the development is built-out to achieve the 0.40 UGF score.

Archaeology

553. The site is located within the 'North Southwark and Roman Roads' Archaeological Priority Area and is of geoarchaeological significance. Having considered the proposal and the desk-based assessment that supports the planning application. The Council's archaeologist is satisfied that there is a secure baseline of data to assess the archaeology on site.
554. In particular, the site is known to preserve palaeoenvironmental remains of interest to inform the ecological development of the Bermondsey Lake (a prehistoric relic channel of the River Thames that runs through Bermondsey, into South Bermondsey crossing the borough border into Lewisham). The site sits upon a change in the gravel surface at the base of the lake, falling from -1.3mod in the north to -3.9mod in the south. What this means is the sequence of lake deposits will be truncated by the proposed basement, the finished floor level of which would (at -3.3mod) be below this level, the piles and pile caps causing this impact. The basement would, therefore, be cut into the underlying gravels over much of the site. For this reason, further assessment and recording of these deposits is necessary.
555. At Bramcote Grove, excavations revealed two phases of bronze-age trackway. This is made up on horizontally-laid oak timbers, held in place with alder stakes over sheets of bark. One phase of the trackway runs to the north and east so would potentially cross into the development site; there are indications that the trackway may turn away from the development site, but equally this could be an entirely different structure. The trenching undertaken on this site is exceptionally limited in scale to enable the preservation of the remains of the trackway, across a broader area and the associated deposits.
556. Given all of the above, the development has the potential to contribute greatly to our knowledge of the prehistoric landscapes of Bermondsey and Southwark.

557. The applicant has agreed to a number of conditions recommended by the Council's archaeologist to secure the archaeological interests of the site. Additionally, and in accordance with Council's CIL and S106 SPD, the applicant will provide £11,171 of funding to cover monitoring and technical archaeological support during the construction works.

Transport and highways

Trip generation

558. Policy T4 of the London Plan requires development proposals to ensure the impacts on the capacity of the transport network are fully assessed and that any adverse impacts are mitigated. Policies P45, P49 and P50 of the Southwark Plan require developments to minimise the demand for private car journeys and demonstrate the public transport network has sufficient capacity to support any increase in the number of journeys by the users of the development.
559. As a borough, Southwark agrees with TfL that bus services will need to be increased in the Old Kent Road area ahead of the delivery of the BLE, in order to accommodate the demand generated by additional homes (as part of Phase 1 of the Delivery Plan) and additional jobs. As part of this agreement, TfL is required to report back to the Council with evidence that these pooled contributions are being spent appropriately; this reporting will serve as evidence that any further financial draw from future development is justified. As part of the agreement, TfL can require contributions from developments based on a tariff of £2,700 per proposed home (or equivalent for shared living units).
560. Given the lack of on-site general needs car parking along with the various public transport options in the area, cycle links and cycle parking, the trips associated with the proposed residential accommodation and the six community/commercial/business units would predominantly be by sustainable travel modes including on public transport, by bicycle and on foot. With regard specifically to public transport usage, the proposed development would generate the following estimated trips:
- 343 two-way public transport trips in the AM peak hour; and
 - 213 two-way public transport trips in the PM peak hour.
561. Compared to the extant planning permission, 18/AP/2947, the new proposal hereunder consideration would generate an estimated net increase of 91 two-way trips in the AM peak and an estimated net decrease of 2 two-way trips in the PM peak.
562. Notwithstanding the net increase in two-way trips in the AM peak compared with the extant permission, it is considered these trip numbers would not have any noticeable adverse impact on the local highway network due to the initiatives proposed in the Travel Plan. These initiatives include the appointment of a dedicated Travel Plan Coordinator, the provision of cycling facilities, furnishing users of the development with travel information, and offering cycle training courses.

563. As there would be a public transport capacity impact, a contribution of £869,400 towards local bus service investment is to be secured for use by Transport for London to ensure the network is commensurately resourced to accommodate the extra passengers, which the applicant has agreed to.
564. A Final Travel Plan and Transport Methods Survey is to be secured by condition to ensure the measures outlined in the draft document are implemented and promoted.

Servicing and deliveries

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

Servicing/delivery trip generation

566. Accommodating servicing trips to and from the site without affecting the operation of Ilderton Road, which is a classified road and bus route, is a critical consideration.
567. The applicant's Transport Assessment, which uses TRICS data and includes an accumulation study, predicts on a daily basis approximately 96 deliveries to the development, with the vast majority being in connection with the PBCL and conventional housing.
568. The TRICS assessment predicts that the maximum number of arrivals and departures would occur between the times of 14:00 and 15:00, when there are 8 and 9 movements respectively. During the busiest hour, this would equate to a vehicle arriving every 7-8 minutes. For the majority of the day the number of servicing trips is significantly lower.
569. While the applicant's estimates are not contested, the integrity of the servicing strategy would be improved by implementing a 20-minute restriction on the two proposed loading laybys (discussed in detail below) between the hours of 6am to 10pm. This 16-hour period is the main time that buses use Ilderton Road, and also includes times when early morning deliveries to a potential convenience store are likely to occur. The applicant has agreed to implementing a Traffic Management Order (TMO) that will apply this loading restriction.
570. Additionally to the TMO for the two proposed inset loading laybys, the applicant has committed to upgrade the existing waiting restrictions along the full 194-metre length of Ilderton Road onto which the site fronts (i.e. from the junction of Zampa Road, northwards until the closed junction with Delaford Road). These upgrades would introduce 'double blips' to the current double yellow lines, preventing loading and stopping at any time of the day or night, 365 days of the year. This will be introduced via a TMO. This will help to ensure that Ilderton

Road does not become obstructed with inappropriately parked or waiting vehicles associated with the demands created by the proposed development.

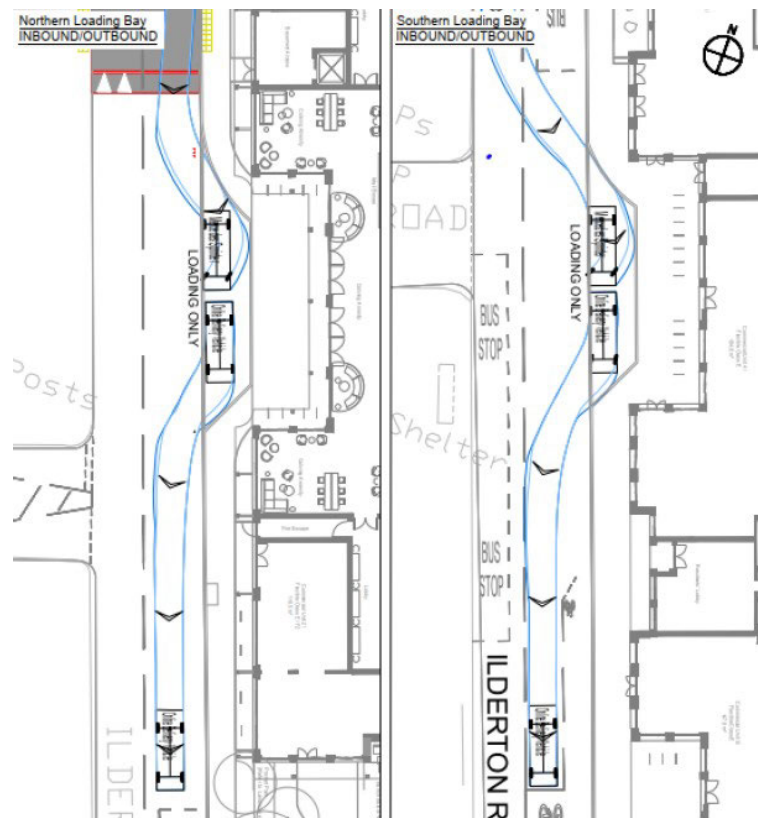
571. In order to meet the key objectives of the plan (i.e. to minimise service vehicle / car conflict and safeguard the amenity of pedestrians), the following initiatives will be adopted through the Final Delivery and Servicing Plan and the associated monitoring mechanisms, including a Delivery and Servicing Bond:

- on-site management team will manage servicing activity at the site, seeking where possible to minimise deliveries during peak hours;
- all residents will be provided with a Home User Guide containing details on how to book deliveries;
- suppliers will be encouraged to use consolidation wherever possible; and
- the management teams will ensure that deliveries remain in the vicinity of the site for as little time as required and that vehicle engines are switched off while stationary (where possible).

Servicing/delivery routing and facilities

572. In terms of routing, all delivery vehicles would approach the site southbound along Ilderton Road, pulling into one of the two fully inset loading laybys proposed along the eastern side of the highway. The proposed arrangement is very similar to that approved under the extant permission.

Images 82 and 83 (near left and near right): Swept path analysis (in blue) of delivery vehicles undertaking simultaneous loading to the proposed northern and southern laybys.



573. The proposed inset laybys would, at 15 metres in length along their shortest edge, be able to accommodate simultaneous deliveries. With the maximum loading duration of 20 minutes per delivery ensured by means of the agreed TMO, the proposed servicing facilities would be of a sufficient size to accommodate the maximum forecasted servicing demand. The Site Management Team (or equivalent) would be responsible for overseeing

servicing and delivery operations at the development. The arrangements are considered acceptable.

Servicing/delivery hours

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

- 09:00 to 20:00 on Monday to Saturdays;
- 10:00 to 18:00 on Sundays and Bank Holidays.

Conclusion on servicing/deliveries

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

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

PBCL move-ins and move-outs

577. The PBCL units would be fully fitted-out for immediate occupation, with the furnishings extending to linens, plants, televisions and wall art. As such, any new resident moving-in to one of the units would bring limited belongings with them. It is therefore likely that a proportion of residents would use public transport to move in and out. As such, by their design, the PBCL units reduce to an extent the reliance on nearby loading facilities on move-in days. Notwithstanding all of these considerations, there will still be a proportion of residents who choose to use a private vehicle on their move-in day.

578. The applicant contends that an 18 month program will be needed to achieve a stabilised occupancy. While this may be true, when the PBCL first opens, a significant number of move-ins could occur within a compressed period of time, which may generate a substantial demand for loading space nearby. In all likelihood, residents arriving by private vehicle would try to use the two proposed inset loading bays on Ilderton; however this has the potential to compromise the delivery and servicing strategy, as these ad-hoc move-ins could prevent commercial delivery vehicles from using the loading bays. A further important consideration is the proximity of two bus stops: one stand is on the western side of Ilderton Road, the other stand will be delivered as part of this planning application on the eastern side. Therefore, maintaining road safety and efficient bus operations along Ilderton Road will be important during the initial move-in period. For example, private vehicles attempting to unload by making use of the

two inset laybys could cause servicing vehicles to wait on the highway, creating congestion and obstructions.

579. To minimise the risk of any of the above scenarios materialising, the applicant has offered the following measures to ensure move-ins are managed effectively:
- morning, afternoon and evening move-in slots will be mandatory (booked online);
 - the move-in days will be staggered across the week and month;
 - move-in dates and time will be co-ordinated by the on-site management team to ensure they do not overlap with other move-ins;
 - during the book in process, it will be communicated to the residents that the loading bays are not available for use and that, if a vehicle is required, alternative arrangements will need to be made on nearby streets where parking is allowed.
580. These measures are considered acceptable. The holistic move-in strategy will be finalised in the Final Operational Management Plan. With the final version of the Plan secured prior to occupation, no harm would be caused to the local highway network or surrounding residential amenity.

Refuse storage arrangements

581. With regard to the PBCL, the combined volumes of refuse produced by the proposed units and ancillary facilities would be stored in a dedicated facility at basement level. Waste would be collected by a private contractor, and on waste collection days PBCL staff would bring the refuse to street level via a dedicated lift. Plans have been provided demonstrating that the refuse store has been sized to accommodate the refuse receptacles necessary to meet the volumes of waste generated by the PBCL, with sufficient manoeuvring and circulation space factored-in.
582. With regard to the 120 conventional housing units, it will be the responsibility of the residents to transport their waste from their apartment to the bins provided in the communal bin store at ground floor level. Waste would be collected by Southwark Council Refuse Services. On the morning of collection, the Registered Provider would arrange for an on-site presence, who will transfer the bins to the collection point (the interior side of the corridor connecting the waste store to the PBCL forecourt). Simultaneous with bringing waiting receptacles to the collection point, these members of staff will return receptacles as they are emptied back to the store. This would ensure that none of the collectors would be required to transport the bins in excess of 10 metres, with the distance being circa 7.4 metres. Metropolitan Thames Valley Housing, the probable Registered Provider for the proposed affordable housing, has supplied a letter explaining they have employed a similar strategy on a number of their affordable housing developments. The proposed collection arrangements are acceptable, as is the detailed design of the stores, with sufficient manoeuvring and circulation space factored-in.

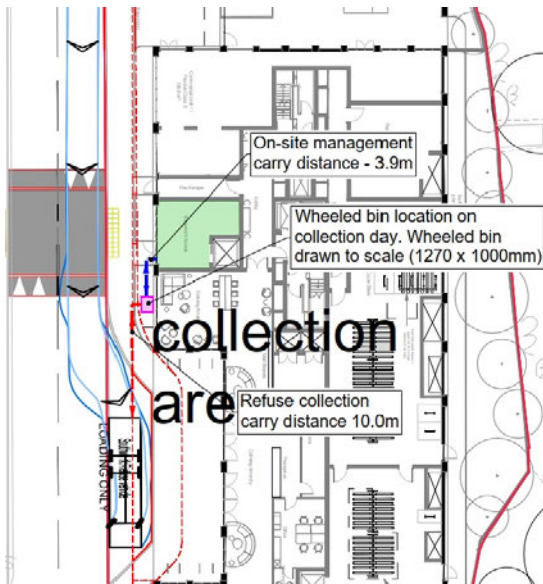


Image 84 (above): Refuse strategy for the PBCL element.

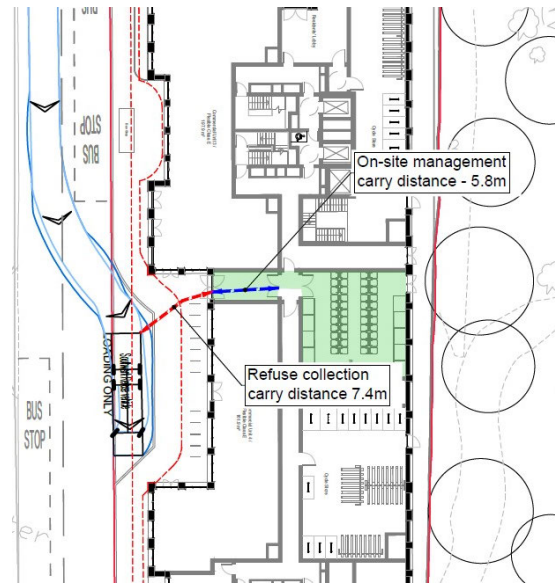


Image 85 (above): Refuse strategy for the conventional housing element.

583. The operators of the community, commercial and employment/business units will be expected to keep refuse within the demise of the property, and transport this to the kerbside on collection day by private contractors.
584. The Final DSP, to be required by condition, will secure the finalised refuse details including the collection arrangements.

Car parking

585. Policy T6 of the London Plan requires developments in locations with existing and future high public transport accessibility to be car-free, save for adequate parking for disabled people. Specific requirements for different uses are set out in Policy T6.1 through to Policy T6.4, while Policy T6.5 deals with non-residential disabled persons parking.
586. Southwark Plan Policy P54 echoes the London Plan, promoting car-free development in zones with good public transport accessibility. It requires car-free non-residential proposals in CAZ locations, and for any disabled parking to be provided on-site and supported by EVCPs.

Wheelchair car parking provision

587. Applying the London Plan standards, a total of ten wheelchair accessible parking spaces should be provided on-site from first occupation of the proposed development, split between the residential uses on the following basis:

- PBCL: six (i.e. 3% of one third of 605)
- Conventional housing: four (i.e. 3% of 120)

588. The Southwark Plan requires a maximum of one car parking space per wheelchair accessible unit, which for this application would equate to a maximum

of 32. This splits as 12 from the conventional housing, and 20 from the PBCL, the latter figure having been arrived at applying a 1:3 ratio to the PBCL wheelchair units). The policy makes clear that lower levels of parking can be provided, depending on:

- the anticipated demand for parking spaces,
- the tenure of the development;
- the quality and accessibility of the local public transport network; and
- the access to local amenities.

589. Given the site's location close to bus routes and the Overground station, as well as its predicted future PTAL rating, residents would benefit from a range of public transport options. The applicant has also offered to fund the delivery of a Car Club bay in the Bramcote Estate, which is close by to the west of the site, which would provide an alternative car travel option for less physically able residents who do not own their own car. On balance, the number of car parking spaces provided is acceptable. Electric vehicle charging points for at least two of the spaces (equating to 20% of the total, rounded up) should be provided, and this will be required by obligation.

Reducing car usage

590. Given that this development would come forward before the Surrey Canal Triangle scheme, which is within the neighbouring borough of Lewisham, the proposed development must contribute towards the costs of establishing a CPZ in both boroughs. Otherwise the development would not be car free, potentially undermining the Mayoral and borough mode shift targets. The applicant has agreed in principle to making such a financial contribution, subject to the full costs of establishing and implementing the CPZ being split (on a fair pro-rata basis) between this development and other forthcoming developments that would benefit from the CPZ. The Local Planning Authority agrees that this is a reasonable caveat. The final sum will be settled on between the Local Planning Authority and the applicant before the Section 106 Agreement is finalised and the planning permission issued.

591. The applicant has also agreed to deliver a Car Club bay, in accordance with Policy P54 of the Southwark Plan. As there is no available space along the Ilderton Road and Zampa Road highways that the site fronts, the space will be delivered on a nearby public highway. This is likely to be on Verney Way, in the adjacent Bramcote Estate. The works will be delivered as part of the Section 278 Agreement.

592. Through an obligation in the Section 106 Agreement, all residents of the proposed development would be exempted from applying for parking permits.

Cycle parking

593. London Plan Policy T5 sets minimum cycle parking standards for different uses. Southwark Plan Policy P53 sets out requirements that are generally higher than the London Plan standards.

594. The table below summarises the minimum cycle parking required by the Southwark Plan and London Plan, alongside the provision proposed by this application. Wherever flexible uses are proposed, the use with the highest storage requirement yield has been adopted for the purposes of these calculations:

Cycle parking minimum policy requirements vs provision: Summary table						
Land use	Long-stay spaces			Short-stay spaces		
	Requirement		Provision	Requirement		Provision
	SP '22	LP '21		SP '22	LP '21	
PBCL	605	605	456	61	16	62
Class C3 housing	206	221	224	12	4	
Flexi commercial	5*	3*	6	26*	26*	
Business/employ't	10*	8*	16	2	2*	
Total	826	837	702	101	48	62

**These flexi commercial calculations are, as per the Southwark Plan and London Plan requirements, based on GEAs (of 132, 219, and 177 square metres for Units 2 to 4 respectively).*

Long-stay cycle parking

595. As the table above shows, the proposal would fall short of the minimum London Plan requirement by 135 long-stay spaces, and the minimum Southwark Plan requirement by 124. This shortfall derives from the PBCL, not from any of the other proposed uses.

PPCL long-stay cycle parking

596. With regard specifically to the PBCL, in total 456 secure long stay cycle parking spaces would be provided – these would be located at ground and basement levels. The mix of formats would be:

- 171 two-tier Josta Stands [342 spaces] (75% of the total);
- 46 standard Sheffield Stands [92 spaces] (20% of the total); and
- 11 Sheffield Stands for use by accessible/larger cycles [22 spaces] (5% of the total).

597. Detailed layouts have been provided of all the cycle stores, showing compliance with the London Cycle Design Standards, including adequate aisle widths and stand spacings, adequate clear headroom, sufficient space for 2 cyclists to use the lift at any one time, and sufficient space for 2 cyclists to pass in corridors. For these reasons, the quality of long-stay cycle storage is considered acceptable.

598. In an effort to address the shortfall from the policy minimum of 605 spaces, the applicant has proposed to supplement the long-stay stands with a pre-loaded 45-bike Cycle Share Scheme. These 45 rentable bikes would be installed within one of the cycle stores at Level 00 of the North Building, with responsibility falling to the PBCL operator to run a booking system, keep the bikes in well-maintained order, and replace/upgrade them as necessary over the lifetime of the development.
599. The drawings submitted with the application suggest the 45 bikes would be provided in the two-tier racks. Notwithstanding the drawings, and at the request of the Council's Transport Policy Team, the applicant has offered to explore opportunities to provide two cargo bikes as part of the Cycle Share Scheme (i.e. 5% of the provision), which will be secured through a Section 106 obligation.
600. The 45-unit Cycle Share Scheme is a non-conventional form of long-stay cycle parking, but may potentially be advantageous to those who do not regularly choose, or have not previously sought out, cycling as a means of travel. The type of bikes to be provided has not been determined at this stage but it is envisaged that they would be a 'hybrid style' model.
601. The applicant has argued that the Cycle Share Scheme should be seen as increasing the quantum of long stay spaces to 501. However, a total 501 spaces would still not achieve full compliance, falling short of the London Plan and Southwark Plan standards by 104. To directly address this, the Travel Plan, which is to be secured via the Section 106 Agreement, will including a mechanism that requires usage to be monitored and for additional cycle parking to be provided off-site should the monitoring prove that the 456 spaces and the Cycle Share Scheme are not meeting the demands of the PBCL residents.
602. The Section 106 Agreement will ensure that the cycle lockers remain free-of-charge and for the exclusive use of occupiers of the PBCL.
603. This failure to meet the minimum policy requirements should be treated as a deficit of the scheme, but –when the mitigation as outlined above is taken into account, and when balanced against the other various benefits of the planning application– not sufficient to warrant refusal of planning permission.

Conventional (Class C3) housing long-stay cycle parking

604. With regard specifically to the conventional housing, in total 224 secure long stay cycle parking spaces would be provided – these would be located at ground and basement levels. The mix of formats would be:
- 84 two-tier Josta Stands [168 spaces] (75% of the total);
 - 23 standard Sheffield Stands [45 spaces] (20% of the total); and
 - 6 Sheffield Stands for use by accessible/larger cycles [11 spaces] (5% of the total).

605. The level, quality and detailed design of the proposed long-stay cycle parking is acceptable. The delivery of these facilities will be secured through a compliance condition.

Community, commercial and business/employment long-stay cycle parking

606. With regard specifically to the commercial and business/employment uses, in total 22 secure long stay cycle parking spaces would be provided, all in Sheffield Stand format. These would be contained within the footprint of the commercial and business/employment units, in the following distribution:

- Unit 1 (business/employment): 6 spaces
- Unit 2 (community café): 2 spaces
- Unit 3 (commercial): 2 spaces
- Unit 4 (commercial): 2 spaces
- Unit 5 (business/employment): 4 spaces
- Unit 6 (business/employment): 6 spaces

607. The total number of spaces exceeds the requirements, and each individual unit would have a level of provision appropriate to its particular use class. Therefore, the proposals are acceptable and final details will be secured through a planning condition.

608. As the non-residential floorspace proposed by this application would take the form of a number of small-scale units, the non-provision of dedicated showers for employees is acceptable in this instance.

Short-stay cycle parking

609. With regard to the proposed short-stay (visitor) provision, 31 stands all in a Sheffield format are proposed, providing 62 spaces in total. The stands would be distributed along the length of buildings' Ilderton Road frontages, with two smalls cluster adjacent to the micro-garden on Zampa Road. These are appropriate locations, as they would keep the majority of the effective footway width clear of cycle storage.

610. While the minimum London Plan requirement would be met by the short-stay provision, the minimum Southwark Plan requirement would not, the shortfall being 39 spaces. In recognition of this, the applicant has offered to monitor the use of the proposed Sheffield stands as part of the Travel Plan and to explore opportunities to provide additional spaces if the demand necessitates it.

611. Given that opportunities have been maximised around the base of the building and within the red line boundary of the site to accommodate visitor cycle parking, and having regard to the applicant's offer to contribute towards investment locally in TfL (Santander) docking stations in addition to the monitoring mechanism within the Travel Plan, in this particular instance the shortfall is considered permissible.

Improving access to cycle hire options

612. Given that the development would introduce up to 114 additional FTE employees to the site as well as up to 725 new households once all the dwellings and PBCL units are occupied, the applicant has agreed to contribute £16,083.33 (index linked) towards expansion of one or more TfL (Santander) cycle docking stations in the vicinity of the site. To be secured in the Section 106 Agreement, this contribution would meet the requirements of Policy T5 of the London Plan and Policy P53 of the Southwark Plan.

Legible London signage

613. The applicant has agreed, at the request of TfL, to make a contribution of £30,000 towards providing new and refreshed Legible London signage. This will be secured in the Section 106 Agreement.

Healthy Streets

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

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

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

616. The Active Travel Audit submitted by the applicant identified that availability of seating for pedestrians and the under-provision of cycle lanes are the largest barriers to active travel within the vicinity of the site.

617. In accordance with Healthy Streets and having had regard to the findings of the applicant's Active Travel Audit, various contributions have been sought from the applicant towards a range of highway safety measures together with improvements to pedestrian/cycle routes in the vicinity of this development. The specific set of works is detailed in the 'Planning Obligations: Summary Table' in a later part of this report, and are focussed on improving the junction between Zampa Road Ilderton Road to ensure conditions are safe, comfortable and convenient for pedestrians and cyclists.

618. In addition to the financial contribution referred to above, through the Section 278 Agreement, Healthy Streets improvements would be delivered in the form of a raised table on Ilderton Road, north of the junction with Ablett Street and south of the junction with Ablett Road. This would have traffic calming benefits.

Level changes across the ground plan

619. The proposed development would improve the public realm along the frontage of the site on Ilderton Road and Zampa Road, including widening the footway to a minimum of 2.5 metres (with exception of four pinch-points, one at either side of the two proposed loading bays). As part of these public realm enhancement works, the improved existing and new footway offered for adoption would be provided with a typical cross-fall of 1:40 from the back of proposed footway to the kerb. This is likely to result in regrading of some of the existing footway to achieve the cross-fall. This is standard practice and will be agreed through the Section 278 process, which occurs subsequent to planning permission being granted. No changes are proposed to the existing road carriageway or kerb levels.
620. The applicant has supplied an indicative Ground Plane Spot Levels Plan showing the level to which the floor slab of the proposed ground floor storey would be cast. The Spot Levels Plan shows that, generally, the external footway surface would be 15-30 centimetres lower than the internal FFL of the ground floor accommodation (i.e. the six non-residential units, the PBCL premises, and the affordable housing lobbies and ancillary facilities). The Spot Levels Plan suggests that, in order to provide DDA-compliant flush thresholds while also reconciling the difference in levels, each of the units would need to contain a sets of steps as well as ramping (for wheelchair users and prams) immediately beyond the entrance doors. The applicant will refine the proposed FFLs as they work through the post-planning detailed design stages, which may result in less internal floorspace needing to be given over to steps and ramping. In the interests of optimising the layout of the development, ensuring the most efficient use of land, and having regard to inclusive design policies and equalities considerations, a planning condition is recommended requiring the applicant to provide a Final Ground Plane Spot Levels Plan prior to above grade works.

Transport and highways summary

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

Environmental matters

Construction management

622. The applicant has submitted an Outline Environmental Construction Management Plan explaining how construction activities will be managed to minimise neighbour amenity, environmental and highway network impacts. This document has been reviewed by the relevant transport and environment consultees, who have deemed it to be a satisfactory framework document.

623. In order to ensure that increases in traffic, noise and dust associated with the demolition and construction phases of the development are minimised, a Final Construction Environmental Management Plan and a Construction Logistics Plan are to be required by condition. The applicant has also agreed to pay a sum of £12,880 to the Council's Highways Network Management to fund their work in monitoring adherence to the CEMP through the demolition and construction phases.

Flood risk, resilience and safety

624. The site is in Flood Zone 3 and is located within an area benefitting from flood defences. The applicant's Flood Risk Assessment sets out that the site is at low risk of groundwater flooding and only a small portion of it is at risk of surface water flooding. The Environment Agency has reviewed the applicant's Flood Risk Assessment and considers it to be acceptable.

625. In terms of flood resilience and safety, the Council's Flood Risk Management Team has assessed the applicant's Flood Risk Assessment and is satisfied that:

- the site will not flood as a result of the 1 in 30 year rainfall event;
- there will be no flooding of buildings as a result of events up to and including the 1 in 100 year rainfall event;
- on-site flow as a result of the 1 in 100 year event (with a climate change consideration) will be suitably managed by locating all residential accommodation on the first floor and above, and through adjusted floor levels directing flows away from buildings; and
- the ground floor substations and basement storey (including the basement-level plant rooms) will be safeguarded from ingress through flood resistant construction up to the flood defence level and the deployment of temporary flood barriers across all relevant door/access openings up to the flood defence level.

626. Compliance with the Flood Risk Assessment will be secured by way of a condition, and a pre-commencement obligation will be imposed requiring submission of a Flood Warning and Evacuation Plan.

Sustainable urban drainage

627. The applicant's Drainage Strategy proposes that surface water flows would be attenuated through the use of a blue/green roof system, rain gardens, rainwater harvesting complemented by geo-cellular storage crates located beneath the paved areas around the base of the building. This has been deemed satisfactory by the Council's Flood Risk Management Team. Two conditions are recommended, one requiring details of the final surface water drainage system to be submitted prior to commencement of the development, and the other requiring submission of a verification report prior to occupation.

628. As a precautionary measure, the Section 106 Agreement will include an offset

obligation in the event that the finalised drainage system fails to achieve greenfield rates of run-off cannot (to be confirmed by the verification report referred to above). The contribution will be calculated at a rate of £366 per cubic meter.

Land contamination

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

Basement-related impacts

630. A Basement Impact Assessment (BIA) was submitted with the application. It assesses predicted ground movements and estimates of any possible degree of damage (according to the Burland scale) on nearby structures and buildings. The BIA concludes that the proposal may result in limited movement of the highway and Network Rail embankment and bridge structure. Any potential serviceability performance impact or cosmetic damage will be mitigated by appropriate construction means and methods (such as temporary propping/shoring and controlled excavation operations), such that Category 2 'Slight risk of damage' of the Burland scale is unlikely to be exceeded.
631. The Council's Environmental Protection Team has assessed the BIA and raised no objections. A compliance condition is recommended to ensure the basement is constructed as per the method statement and with all mitigation measures implemented where necessary. A Section 106 obligation relating to an Approval in Principle (AIP), due to the proximity of the basement to the public highway, is also recommended.

Wind microclimate

632. London Plan Policy D9 requires all tall building proposals not to cause changes to the wind environment that would compromise comfort and the enjoyment of open spaces around the building and in the neighbourhood. Southwark Plan Policies P14 and P56 require wind effects to be taken into consideration when determining planning applications, as does Policy P17 where the proposal is a tall building.
633. The applicant's Wind Microclimate Report submitted in support of the application considers the following scenarios
- Scenario 1 – existing baseline.
 - Scenario 2 – proposed development in the 'Existing Surrounds, with Mitigation'

- Scenario 3 – proposed development in the ‘Future Surrounds, with Mitigation’ (the cumulative scheme that fell within the extent of the wind tunnel model is the Surrey Canal Triangle scheme)

634. Wind conditions have been categorised using the Lawson Comfort Criteria and the predicated wind conditions compared against the intended pedestrian uses.
635. The Wind Microclimate Report finds that, at elevated levels of the proposed buildings, all areas would be rated as “safe” for occupant use throughout the year. As such, no further consideration will be given to balconies and terraces, and the remainder of this assessment will focus solely on wind conditions at ground level.

Proposed Development in the ‘Existing Surrounds, with Mitigation’ scenario

636. The Wind Microclimate Report finds that, when the proposed development is modelled in the ‘Existing Surrounds and Mitigation’, there is one location (P159) where wind conditions would be categorised as “unsafe frail”. This means that the location in question has the potential to experience more than 15 m/s wind speed more than 0.023% of the time, but conditions would not be severe enough to qualify as “unsafe”. This represents about 9 hours annually. More simply, “unsafe frail” can be understood as indicating a safety risk for elderly people, cyclists, children, or those have difficulties with walking. Importantly, the location in question is a parking courtyard that would be typically enclosed behind an automatic gate, and thus used only by a small number of people on an irregular basis.
637. Away from area P159, the wind conditions are rated as “safe” for pedestrian and cyclist use throughout the year. Notwithstanding that “safe” conditions would be achieved, there were 16 test points where the comfort criterion for the typical pedestrian activity taking place in that location was exceeded during the winter season (worst season). The table below summarises these:

“Safe” exceedances of the Lawson comfort criteria: Summary table			
<u>Predominant use / activity in the location</u>	<u>No. of exceed-ances</u>	<u>Spot reference of the exceedances</u>	<u>General location</u>
Sitting	2	P6 and P89	On the northern edge of the Pocket Park
Standing	8	P27 and P120	At the junction of Zampa and Ilderton Roads, and in the parking courtyard of 45-56 Barkworth Road
		P32	Parking area at the North Building
		P56	At the centre of the Pocket Park

		P135-137 and P147	On the South Bermondsey Overground railway platforms
Strolling	3	P44, P48 and P54	Clustered around the northwest edges of the two buildings
Entrances	2	P13 and P22	Entrance to the social rent block (Block C) and entrance to Unit 5 (an employment/business unit).

638. The left hand image below shows the ‘Existing Surrounds, with Mitigation’ scenario in winter, denoting the comfort conditions at all tested locations using a colour scale. The right hand image below pictorially represents locations that overall tested “safe,” “unsafe frail” and “unsafe”.



Image 86 (above): Comfort conditions map of the proposed development in the ‘Existing Surrounds, with Mitigation’ scenario

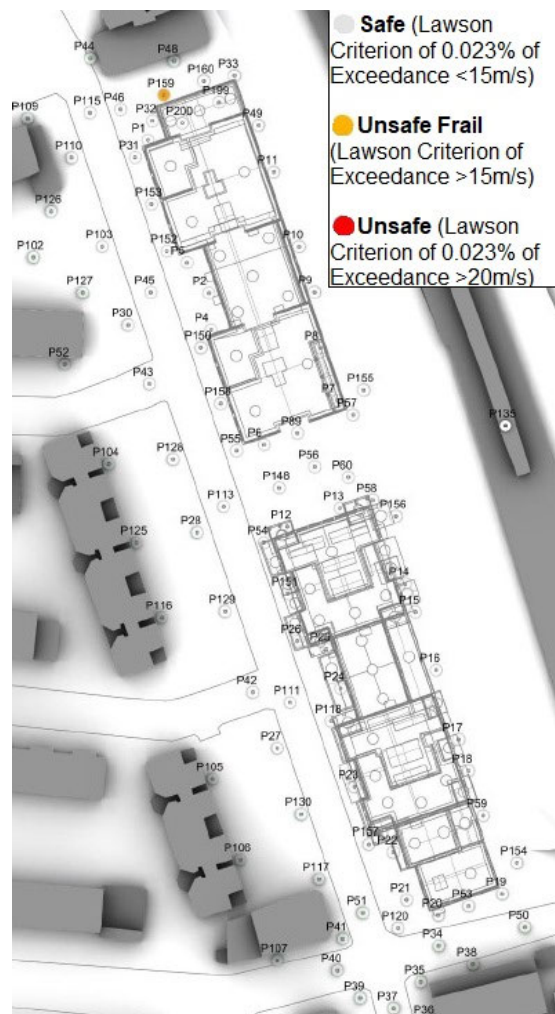


Image 87 (above): Safety conditions map of the proposed development in the ‘Existing Surrounds, with Mitigation’ scenario

639. With regard to the two sitting locations where exceedances would be experienced, it is important to note that these would occur only in the winter season. Under the industry standard microclimate guidelines, outdoor public

sitting areas only need to pass the sitting criteria in the summer season. The applicant's Wind Microclimate Report finds that the wind conditions at these locations would be comfortable for sitting during the summer season.

640. With regard to the eight standing locations where exceedances would occur, it is important to recognise that:

- at P27 and P120 (which are, respectively, a parking court and a public footway), these are locations that generally people will move through rather than dwell at, and the conditions would be suitable for standing in the summer season;
- the exceedance at P32 would, like with the "unsafe frail" exceedance at P159, occur within a gated parking court not frequently in use;
- in the existing site condition (i.e. Scenario 1), the wind conditions at P135-P137 and P147, which are on the platforms at the Overground station, were uncomfortable for standing during the winter season so in these instances conditions would be not noticeably worse;
- at P56 (in the Pocket Park), conditions would be suitable for standing in the summer season, the point in question is located where a path is proposed, and there are a number of other locations in the Pocket Park where winter sitting can take place comfortably.

641. With regard to the four strolling locations where exceedances would be experienced, the conditions here would be more suited to "business walking". One of these locations would be in the Ilderton Road carriageway and another would be in the parking court at the North Building, and as such neither will be in frequent pedestrian use. The other two exceedance points are in constrained locations where installing mitigation would be difficult.

Proposed Development in the 'Future Surrounds, with Mitigation' scenario

642. In Scenario 2, 'Future Surrounds, with Mitigation', as per Scenario 2, the wind conditions would exceed the safety criterion at one location (P159) within the site. This represents about 6.5 hours annually – a reduction on the number of hours' occurrence in the 'Existing Surrounds, with Mitigation' scenario.

643. In the presence of the future surrounds, the wind conditions at the site and surrounds would be mostly the same as the wind conditions that occurred for Scenario 2. Locations P13, 22, 27, 32, 56 and 120 would see an improvement due the presence of the future buildings and would be suitable for intended use during the worst season (winter). Despite these improvements, the wind conditions at P02 and P82 would be worse than in Scenario 2, exceeding the comfort criterion for intended use in the worst season. Overall, there would be 11 locations which would remain "safe" but where exceedances occur, which is 4 fewer than in the 'Existing Surrounds and Mitigation' scenario.

644. It is also important to note that, in the future surrounds, the wind conditions for the summer season would be the same as the conditions that occurred for scenario 2.

Conclusion on wind microclimate

645. All reasonable wind and microclimate mitigation measures have been implemented to bring the wind conditions surrounding the proposed development to a level that are safe in all instances, save for one isolated “unsafe frail” location that would in all likelihood be infrequently used. It is not considered that in the latter location any further wind mitigation measures could be employed without creating negative transport, design and public realm impacts. On balance, it is considered that London Plan Policy D9 and Southwark Plan Policies P14, P17 and P56 have been met.

Air quality

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

Agent of change

650. Where new residential and other sensitive uses are proposed close to existing noise- and other potentially nuisance-generating development, Policy D13 of the London Plan 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.
651. Adjoining the site to northwest is Mehmet’s Tyre Shop, which provides car repair/maintenance services. Some of the activities take place in the open air yard to the front of the Tyre Shop site. Through the following design measures and planning mitigation, the day to day business activities at this adjoining premises would not be prejudiced:

- minimising the number of habitable rooms in the North Building that face towards the common boundary;
- setting back the North Building from the boundary to create a separation gap;
- detailing the facades and glazing in response to the ambient background noise levels locally; and
- attaching planning conditions to the decision notice to ensure the PBCL premises are fitted out to achieve certain levels of resistance to noise disturbance.

652. Additionally, the proposed commercial unit closest to the common boundary, Unit 1, is intended to be used for office or light industrial purposes. The activities that could potentially take place within Unit 1 would not be dissimilar in nature to those at Mehmet's Tyre Shop, helping to reaffirm the character of this section of Ilderton Road as a place where light industrial uses –some of which may produce low-level noise– coexist with residential.

653. Other nearby uses sensitive to 'agent of change' include Millwall Football Club, the Christ Apostolic Church, the railway lines to the east of the site and the bus routes to the west. All proposed residential units would be specified to ensure reasonable resistance to sound such that these nearby noise-generating uses would not be at risk of having their operations compromised and/or any future growth unreasonably curtailed. No issues are foreseen in respect of the nearby uses and public transport services being unable to function/coexist with and grow alongside the proposed non-residential uses.

Light pollution

654. With respect to light pollution from interior sources, no undue effects would result from the occupation of the proposed commercial and residential uses.

655. With respect to light pollution from exterior sources, buildings close to existing residential uses are not typically fitted with external lighting above ground floor level in the interests of minimising amenity harm to the surroundings. Lighting additions on the facades of the proposed North and South Buildings would be set no higher than ground level, and not in close proximity to surrounding residential dwellings. As such, there would be no overspill harmful to residential amenity.

656. The proposed development would include lighting within the high-level gardens at both the North and South Buildings. This will be a mix of pole-mounted and bollard-integrated luminaires, alongside lighting integrated into seating, edges, and pergolas.

657. The applicant recognises that the east boundary is sensitive with respect to potential impacts on wildlife along the existing neighbouring embankment, which is a SINC. Lighting to the access lanes will be appropriate to create a safe environment and low level to avoid spillage.

658. In summary, the proposal does not raise light pollution concerns. The final external lighting proposals, including any pre-determined dim-down and turn-off times, will be agreed through the Final Lighting Strategy, to be approved by the Council prior to first occupation of the building; this will be secured by condition.

Fire safety

659. Policy D12 of the London Plan 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.

660. A Fire Strategy was submitted with the application; this was replaced by an updated version when the proposed development was amended mid-way through the application process to incorporate a second stair. The updated Fire Strategy includes a matrix that assesses the scheme for compliance against the relevant parts of Policy D12. Among other things, the Fire Strategy confirms that:

- the North Building would be served by four stairs for means of escape and fire service operations, while each of the two blocks in the South Building would be served by two stairs;
- the corridors that lead to all stairs on each floor would be separated, with all of these corridors fully ventilated to ensure sterility;
- all blocks would contain at least one fire-fighting shaft and at least one evacuation stair;
- separate firefighting and evacuation lifts in each core at the North Building would be provided, whereas combined firefighting and evacuation lifts are proposed in each core at the South Building;
- The staircases would be partitioned at ground floor to separate the basement staircase with the staircase serving the upper floors
- all plant rooms and common rooms accessed from single direction escape would be provided with lobby protection to the residential corridor;
- a “stay put” policy would apply for the conventional (Class C3) housing, but a “simultaneous evacuation” strategy would apply for the PBCL;
- appropriate active fire protection system would be installed, including fire detection and alarm, emergency lighting and signage, sprinklers and smoke control systems;
- in the case of an emergency, the evacuation lift would switch from its everyday use to becomes a tool only for the evacuation of persons with disabilities and is not considered a general escape route;
- Building Regulations Approved Document B compliance would be achieved; and
- the internal layout would achieve compliant travel distances.

661. The Fire Strategy was produced by fire risk engineering consultancy BB7. The contents of the document have been checked and approved by a certified fire risk engineer (an Associate of the Institution of Fire Engineers (AIFireE)).

662. On account of the above, the relevant fire risk minimisation policies of the London Plan are deemed to have been satisfied.
663. It should be noted that the HSE was consulted as part of the original round of consultation, at which time the South Building only contained one staircore per block; this elicited a consultation response from the HSE objecting to the proposal. The applicant amended the proposal to incorporate a second staircore into each block at the South Building. Reconsultation was then carried out with the HSE; however, at the date of this report, no response has been received.
664. This application is being brought to Members with a recommendation for approval because, in spite of the HSE's re-consultation response, officers are confident that the proposal will meet the Gateway One requirements. Should the HSE's reconsultation response uphold the objection, all further steps towards issuing the decision notice will be paused (i.e. Stage 2 referral and Section 106 Agreement finalisation) until such time that the HSE withdraw their objection. Although the HSE does not have the power to direct refusal of planning permission, the sensitivity of fire safety matters is such that the Local Planning Authority treats a PGO objection as adequate grounds in and of itself for refusing planning permission. Members can be assured that permission will not be granted until the applicant has addressed HSE's concerns and the objection has been withdrawn. In the event that major changes are required to the proposals in order to overcome the objection, the application would be returned to Planning Committee.
665. A condition is recommended to ensure the construction and in-use operation of the building are carried out in accordance with the Fire Strategy. As the GLA's Stage 1 response expressly requested that the fire lifts are secured, a condition is recommended to this effect.

Energy and sustainability

666. Chapter 9 of the London Plan deals with all aspects of sustainable infrastructure and identifies the reduction of carbon emissions as a key priority. Policy SI2 "Minimising Greenhouse Gas Emissions" requires all developments to be net zero carbon with a minimum on-site reduction of 35% against the Part L 2021 baseline for both commercial and residential uses. Non-residential development should achieve a 15% reduction in emissions through energy efficiency measures. Where developments are unable to meet net zero carbon targets any shortfall between the minimum 35% and zero carbon must be mitigated by way of a payment towards the carbon offset fund. The energy strategy for new developments must follow the London Plan hierarchy (comprising 'be lean', 'be clean', 'be green' and 'be seen') and this must be demonstrated through the submission of an Energy Strategy with applications, as well as post construction monitoring for a period of 5 years.
667. Southwark Plan Policies P69 and P70 reflect the approach of the London Plan by seeking to ensure that non-residential developments achieve a BREEAM rating of 'Excellent' and include measures to reduce the effects of overheating using the cooling hierarchy. The policies pursue the 'lean, green, clean and

seen' principles of the London Plan and require non-residential buildings to be zero carbon with an on-site reduction of at least 40% against the Part L 2021 baseline. Any shortfall must be addressed by way of a financial contribution towards the carbon offset fund.

Energy and carbon emission reduction

Be Lean

668. In terms of meeting the 'be lean' tier of the hierarchy, a range of passive and active measures are proposed. The passive measures include:

- optimising glazing to limit solar gains, maintain fabric performance, and encourage the benefits of daylighting;
- specifying high performance opaque envelope elements;
- specifying efficient double-glazed windows;
- improving airtightness;
- maximising passive ventilation potential;
- specifying Low Emissivity coated glass and low G values to reduce unwanted solar gains;
- passive shading through protrusions in façade design; and
- recessing windows as much as possible to provide added solar shading.

669. The active measures include:

- using low energy proposed lighting throughout;
- specifying low energy light fittings with auto on / auto off presence detection where appropriate elsewhere in the development; and
- installing energy efficient heat recovery ventilation systems;
- supplying the co-living studios with domestic hot water via air source heat pumps which connect to water-to-water heat pumps.

670. These 'demand reduction' measures will achieve a 12% reduction in carbon emissions for the residential uses, and an 8% reduction in respect of the non-residential uses. This equates to an overall reduction of 12%, which falls short of the policy target of 15%.

Be Clean

671. The site is within an area identified as having district heating potential and is within a local heat study area, as identified within the London Heat Map. However, no district heating network with connection opportunities exists at the current time. As such, all parts of the development would be served by a centralised energy centre, which itself would draw from a centralised air-source heat pump system (ASHP).

672. By designing-in a futureproofed plant room at basement level, the opportunity to link the development into a wider district heating system would be safeguarded. This meets the requirements of Policy SI 3 of the London Plan.

673. As no immediate connection to a district heating network is proposed, no carbon savings are reported from the 'be clean' stage of the energy hierarchy.

Be Green

674. With respect to the 'be green' tier of the hierarchy, the applicant has proposed the following technologies:

- air source heat pumps (on the roofs of the North and South Buildings) to supply heat and hot water; and
- 130 photovoltaic panels with a peak capacity of 42.25kWp (to be located on the south face of the roofs of the North and South Buildings) to supply direct current electricity.

675. These 'be green measures' would reduce carbon emissions by 66% for the residential uses and 18% for the non-residential. On a side-wide basis, this equates to a reduction of 62%. The applicant has demonstrated that opportunities for renewable energy by producing, storing and using renewable energy on-site have been maximised.

Be Seen

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

677. The applicant's Energy Statement calculates that unregulated per annum energy emissions for the development would be 53.63kWh/m².

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

Total energy savings

679. 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.

680. The proposal would reduce on-site regulated carbon dioxide emissions by 74% over a notional building minimally compliant with the Building Regulations 2021, which is above the 40% on-site target. The performance is summarised in the below table:

Development CO2 Emissions from each stage of the Energy Hierarchy			
	Total Regulated Emissions	CO2 Savings	Percentage saving
Part L 2021 Baseline	465.8 tonnes CO2		
With Be Lean applied	412.2 tonnes CO2	53.6 tonnes CO2	12%
With Be Clean applied	412.2 tonnes CO2	0	0
With Be Green applied	123.3 tonnes CO2	288.9 tonnes CO2	62%
Cumulative saving		342.5 tonnes CO2	<u>74%</u>
Shortfall on carbon zero	123.3 tonnes CO2		

681. The energy savings, as detailed above, which take into account the decarbonisation of the electricity grid, demonstrate the good environmental and sustainability credentials of the proposed development. The total per annum shortfall in savings relative to carbon zero would, at a rate of £95/tonne for 30 years, generate an offset contribution of £351,338. The offset contribution will be secured in the Section 106 Agreement, with appropriate adjustment clauses should there be any improvements to the carbon emissions in the post-planning design development stages.

Whole life cycle and carbon capture

682. London Plan Policy SI2 requires all major development proposals to be supported by a whole life cycle carbon assessment. This assesses the embodied and operational emissions associated with redevelopment.

683. 'Embodied carbon' is the term used to describe the carbon emissions associated with:

- extraction and manufacturing of materials and products;
- in-use maintenance and replacement;
- end of life demolition, disassembly and disposal; and
- the transportation relating to all three.

684. 'Operational carbon' is the carbon dioxide associated with the in-use operation of the building. This usually includes carbon emissions associated with heating, hot water, cooling, ventilation and lighting systems, as well as those associated with cooking, equipment and lifts.

685. Driven by the aim of achieving net carbon zero for new development by closing the implementation gap, whole life cycle carbon assessments are monitored at the pre-application, submission and post-construction stages. Policy P70 of the Southwark Plan reinforces the need to calculate whole life cycle carbon

emissions through a nationally recognised assessment and demonstrate actions taken to reduce life cycle carbon emissions.

686. The submitted whole life carbon assessment for the planning application considers the operational carbon and embodied carbon of the proposal throughout its life from construction, use and deconstruction. The assessment finds that over a 60-year study period, the development's operational and embodied load would be:

- 460 kgCO₂e/m² for Modules A1-A5 (covering the product sourcing and construction stages); and
- 300 KgCO₂e/m² for modules B to C (covering the in-use and end-of-life stages), excluding operational energy and water.

687. For predominantly residential developments, the benchmark set by the GLA for Modules A1-A5 is 850kgCO₂e/m², with an aspirational benchmark of 500 kgCO₂e/m² GIA. The benchmark for Modules B-C is 350kgCO₂e/m², with an aspirational benchmark of 300kgCO₂e/m². Therefore, the proposed development exceeds the aspirational benchmark for Modules A1-A5 and meets it for Modules B-C. The main contributing factors in the development achieving this commendable performance are the high Ground Granulated Blast Furnace Slag (GGBS) content used in the concrete at substructure (40%) and the moderate GGBS content used at superstructure level (30%). The frame of the development is reinforced concrete, where the reinforcement has a high recycled content of 97%.

688. Two conditions to require two further stages of whole life-cycle carbon assessment in the detailed design and completion stages are proposed

Circular economy

689. Southwark Plan Policy P62 states that a Circular Economy Statement should accompany planning applications referable to the Mayor. Circular economy principles include conserving resource, increasing efficiency, sourcing sustainably, designing to eliminate waste and managing waste sustainably at the highest value. London Plan Policies GG5, D3 SI7 and all mention circular economy principles and the benefits of transitioning to a circular economy as part of the aim for London to be a zero-carbon city by 2050.

690. A detailed Circular Economy Statement was submitted with the application, which sets out strategic approaches, specific commitments and the overall implementation approach.

691. The broad strategic approaches for the development include adopting lean design principles, minimising waste, specifying materials responsibly and sustainably, and designing for longevity, adaptability and flexibility. Ways this will be achieved include:

- minimising material use through prefabrication off-site (mainly this will relate to the window units, masonry panelling, brick slips, balconies and metalwork);
- using demountable and reusable scaffolding;
- using steel with high recycled content;
- using the floorplate configurations on standard modules in terms of columns and core placement, avoiding curves and maximising standard approaches;
- aspiring to use wherever possible concrete that has a minimum GGBS value of 50%;
- making design and material selections in keeping with future weather requirements for better thermal performance and energy efficiency;
- using only certified timber products; and
- giving preference, where possible, to materials with Environmental Product Declarations.

692. Specific targets committed to by the applicant include:

- diverting at least 95% of the waste from going into landfill or for incineration; and
- making beneficial use of at least 95% of excavation waste;
- ensuring the contractor prepares and implements a Site Waste and Resource Management Plan (SWMP/RMP).

693. The End of Life Strategy finds that the material recovered (i.e. use of recycled material or reuse in the construction of the building) is 9.4%, and it estimates that about 52.2% of the proposed scheme's material can be returned at the end of the life of the building. This produces a Building Circularity Score of 30.8%

694. The application has addressed the requirements of London Plan Policy SI7, Southwark Plan Policy P62, and has referenced the GLA's guidance in producing the Circular Economy Statement. Conditions are proposed requiring post-completion reporting. Subject to these conditions, the proposal is considered to comply with the sustainable materials element of Policy P17.

Overheating and cooling

695. London Plan Policy SI4 details that major development proposals should demonstrate how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy. Policy P69 of the Southwark Plan states that development must reduce the risk of overheating, taking into account climate change predictions over the lifetime of the development, in accordance with the cooling hierarchy.

696. The six-step hierarchy that should be followed when developing a cooling strategy for new buildings is as follows:

- minimise internal heat generation through energy efficient design; then

- reduce the amount of heat entering the building through the orientation, shading, albedo, fenestration, insulation and green roofs and walls; then
- manage the heat within the building through exposed internal thermal mass and high ceilings; then
- use passive ventilation; then
- use mechanical ventilation; then
- use active cooling systems (ensuring they are the lowest carbon options).

697. The following paragraphs explain how the applicant has pursued this six-step process.

Minimise internal heat generation

698. In both the residential and non-residential elements of the development, internal heat generation is to be minimised through measures including low energy lighting (to reduce lighting gains), low heating system water temperatures, and applying insulation to the communal pipework in excess of the Building Regulations and British Standards enhanced specification to avoid distribution losses.

Reduce heat entering the building

699. The heat entering the proposed development is to be reduced by a combination of measures. These include solar control glazing incorporating a G value of 0.4 or better, orienting the buildings so that rooms are mainly east- or west-facing, proposing deep reveals to windows and doors, and installing biodiverse roofs to reduce heat gains from the exposed roof.

Manage the heat within the building

700. Good floor-to-ceiling heights are proposed in both the residential and non-residential parts of the proposed development. Where possible in the non-residential parts of the development, exposed concrete will assist with thermal mass.

Use passive ventilation

701. With regard to the residential uses specifically, a number of passive ventilation measures are proposed. These include optimising the number of dual aspect units to facilitate good cross-ventilation. Where single-aspect apartments are proposed, full height balcony doors/windows would aide single sided ventilation. Additional passive measures include trickle vents, which would provide background ventilation even when the windows are closed

702. In a scenario where only passive measures (i.e. no mechanical or active measures) are incorporated into the residential parts of the development, 99% of the rooms would fall short of the recommended level of summer comfort. This is due to limitations with naturally ventilating the occupied spaces due to high ambient external noise levels and security restraints that prohibit fully

unrestricted opening of windows. As such, the applicant had to proceed to stage 5 of the cooling hierarchy (as discussed below).

703. Turning to the commercial uses, for which equipment and occupancy gains are two most common sources of overheating risk, the proposed passive measures include designing as many of the commercial units as possible to be dual aspect and installing top hung openable windows at desk level for natural ventilation and easy occupant control.
704. Notwithstanding these efforts, passive measures alone would not be sufficient to overcome the risk of overheating in the commercial spaces. As such, the applicant had to proceed to stage 5 of the cooling hierarchy (as discussed below).

Use mechanical ventilation

705. With regard to the residential uses (including common areas), mechanical ventilation is proposed, which is aimed at peak lopping and is only intended to mitigate the internal temperature when CIBSE TM 59 is breached. Owing to the communal corridors in the South Building having no external windows, attendant with which is the potential risk of overheating, mechanical ventilation is also proposed in these parts of the residential uses. With these systems in place, in no part of the proposed residential uses is active cooling required to supplement this mechanical cooling.
706. With regard to the commercial uses, as with the residential uses, mechanical ventilation is proposed to provide additional ventilation before the temperature reaches the operating temperature for cooling. This would help reduce the cooling demand. Notwithstanding the incorporation of mechanical ventilation, the modelling returned a number of failings. As such, the applicant had to move to stage 6 of the cooling hierarchy.

Use active cooling systems (low carbon)

707. While the steps taken in accordance with the cooling hierarchy, as set out above, would reduce the need for cooling, they would not be sufficient to avoid overheating risk throughout the year in the commercial parts of the development. As such, active cooling would be required in the form of highly efficient low carbon air source heat pumps to serve the non-residential elements of the development, where higher occupancy levels and equipment gains are anticipated.

Summary

708. Following the cooling hierarchy, the applicant has demonstrated that the building cooling demand has been kept as low as possible with minimal solar gains. Active cooling is proposed for the non-residential parts of the development because –due mainly to the overheating risks associated with equipment and occupancy gains– natural ventilation alone would not be sufficient to guarantee the occupiers' and users' comfort, in line with the criteria

set out in CIBSE TM 52 guidance. With the proposed measures taken into account, the overall building efficiency would be enhanced. This is considered to be in compliance with London Plan Policy SI4 and Southwark Plan Policy P69.

BREEAM

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

Water efficiency

710. The Sustainability Strategy submitted by the applicant confirms that the proposed development aims to minimise water consumption such that the BREEAM excellent standard for the 'Wat 01' water category would be achieved, as required by London Plan Policy SI5. This will be achieved through the specification of features such as:
- water-efficient sanitary fittings;
 - each meter (main and sub) having a pulsed output or other open protocol communication output to enable connection to appropriate utility monitoring and management system;
 - installation of a leak detection system will be installed; and
 - the landscape design and irrigation strategy (which will be designed to be water efficient and will include drip-fed subsurface irrigation incorporating soil moisture sensors).

Communications and aviation

Digital connectivity infrastructure

711. 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.
712. To ensure London's long-term global competitiveness, Policy SI6 "Digital Connectivity Infrastructure" of the London Plan 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.
713. The applicant has not confirmed in writing that the development would have the incoming duct arrangements to suit the provisions from the local networks, or

that by the time construction works are underway 1GB/s fibre should be available. In this Major Town Centre location, it is very unlikely that delivering such digital infrastructure would prove difficult, and as such it is considered acceptable in this instance for the requirements of Policy SI6 post-decision through a Digital Connectivity Strategy planning condition.

Television, radio and telecommunications networks

714. The NPPF requires local planning authorities to consider the potential for new development to interfere with broadcast and electronic communications services, and to mitigate this adequately. Part C of London Plan Policy D9, which is concerned with the functional impacts of tall buildings, echoes this, requiring that “buildings, including their construction, should not interfere with [...] telecommunication”.
715. The applicant has submitted a two part document, the first part of which is Baseline Television and Radio Signal Survey, the second part being a Reception Impact Assessment. This document finds that, with regard to both the construction stage (involving the use of tower cranes) and the proposal itself once built, there could be disruption to the reception of digital satellite television services (i.e. Freesat and Sky) in the immediate vicinity of the North Building. This would be centered on properties at Ablett Street, Delaford Road, Barkworth Road and Ilderton Road. If interference were to occur, the repositioning of satellite dishes to new locations without an obscured line of sight view to the serving satellites would restore all services. If satellite dish relocations were not feasible, the use of DTT receiving equipment would also offer any affected viewer an alternative source of digital television broadcasts.
716. Arqiva was consulted on the planning application and responded raising no concerns.
717. On balance, it is not considered that there would be any adverse harmful impacts.

Aviation

718. The NPPF recognises the need for new development to maintain the national network of general aviation airfields, and their need to adapt and change over time. Part C of London Plan Policy D9 requires tall buildings not to interfere with aviation or navigation.
719. No response has been received from the Civil Aviation Authority or NATS to the consultation and reconsultation requests issued by the Local Planning Authority in relation to this planning application. Given the height of this proposal relative to nearby consented tall buildings at the Surrey Canal Triangle site, and also bearing in mind that the extant permission at the site has a maximum height slightly taller than that of the 23/AP/0387 scheme, it is reasonable to conclude that the proposed tall buildings would not cause any harmful aviation impacts.

Socio-economic impacts

720. London Plan Policy E11 requires development proposals to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases. This requirement is also covered by Southwark Plan Policy P28, with the methodology for securing these opportunities prescribed by the Council's Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015 with 2020 Update)
721. In accordance with the policy framework, there would be a requirement for this development to deliver training and employment during the construction phase only. 23 construction industry apprentices, 95 short courses and 95 sustained jobs for unemployed Southwark Residents would be required. These would all need to be filled by the applicant in accordance with a Construction Phase Employment, Skills And Business Plan. These obligations will be secured through the Section 106 Agreement.
722. In terms of direct employment, the PBCL element of the proposal has the potential to deliver up to 25 FTE positions, the commercial units has the potential to create up to 50, and the employment/business units have the potential to sustain 44. Given that the site's most recent use sustained 5 jobs, the maximum FTE additionality from the site would, therefore, be 114 jobs.

Planning obligations

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

<u>Obligation</u>	<u>Mitigation / Terms</u>
Archaeology	
	A sum of £11,171 by the developer on signing of the Section 106 Agreement towards monitoring and providing

ARCHAEOLOGY: MONITORING CONTRIBUTION	<p>technical archaeological support during the works on and in the vicinity of the site.</p> <p>Applicant's Position: Agreed</p>
Community café: Delivery of premises	
FIT-OUT	<p>No later than 12 months following implementation of the development (or such later date as may be agreed in writing by the Council), the developer is to submit the Community Café Specification to the Council for approval.</p> <p>The developer is to construct the Community Café in accordance with the approved Specification and to the reasonable satisfaction of the Council.</p> <p>Applicant's Position: Agreed</p>
DELIVERY	<p>The Community Café is to be completed in accordance with the approved Specification, and made available for occupation no later than 75% occupation of the North Building.</p> <p>Applicant's Position: Agreed</p>
Community café: Conditions of operation	
CONDITIONS OF OPERATION	<p>The Community Café shall only be tenanted and operated by either:</p> <ul style="list-style-type: none"> - the applicant / building owner; or - a Non-Profit Organisation registered with the appropriate body (at least either the Charity Commission or the Government's Charity Register). <p>All income from the Community Café shall be used to sustain and manage the Community Café enterprise; any surplus profit shall be used to fund positive charitable projects based at the development for the local community.</p> <p>Applicant's Position: Agreed</p>
CONFIRMATION OF TENANCY	<p>Upon the execution of each and every tenancy with each and every Non-Profit Organisation Café Operator, the developer shall submit a copy of that lease to the Council.</p> <p>Applicant's Position: Agreed</p>

Community café: Community availability	
USE OF THE SPACE BY ELIGIBLE USERS FOR COMMUNITY EVENTS	<p>Throughout the lifetime of the Community Café, the operator shall make part or all (as appropriate, depending on anticipated number of attendees) of the dining area available for at least 10 hours per week at zero cost to eligible Community Café Users.</p> <p>In the interests of ensuring a range of slots are available to users in any given week, the minimum 10 hours of community use per week shall be split into slots, each to be:</p> <ul style="list-style-type: none"> - no shorter than 1 hour in duration; and - no longer than 4 hours in duration. <p>Eligible Community Café Users shall be community groups, not for profits and cultural projects using the facility for non-profit making purposes. Should any event be anticipated to attract a number of attendees in excess of the capacity of the café, reasonable endeavours should be made to hold such 'one-off' events in the PBCL Residents' Amenity Space.</p> <p>The operator shall be responsible for:</p> <ul style="list-style-type: none"> - absorbing all costs associated with the operation of the facility during periods of usage by Community Café Users, including utilities and cleaning costs; and - ensuring the facility is in good running order immediately before use by the Community Cafe Users.
	Applicant's Position: Agreed
MANAGEMENT, MARKETING AND OPERATION	<p>No later than three months prior to the first opening of the Community Café, the developer shall submit a Community Café Management and Marketing Plan to the Council for its approval. This Management and Marketing Plan shall include:</p> <ul style="list-style-type: none"> - details of the entity responsible for managing and operating the Community Café; - an outline of the proposed uses and types of events that may take place at the Community Café; - the minimum hours of operation of the Community Café; - the minimum hours of access/use for eligible Community Café Users; - how the four preceding matters have been informed by the engagement carried out and

	<p>themes documented in the Community Investment Programme submitted with the planning application;</p> <ul style="list-style-type: none"> - details of the booking system (who will be responsible for managing it, how community and/or non profit-making status of customers will be verified, how popular or high value slots will be managed so as to prevent regular block booking etc.); - the platforms (local press, social media, within the display window of the premises, on the relevant community premises Council webpages etc.) through which the Community Café will be marketed, together with details of the frequency/duration of marketing; - a strategy setting out how, in the event that the tenancy with the NPO is terminated or expires, the Community Café will be operated and managed on a non-profit making basis in the interim period until a new tenancy is granted. - such other matters as the Council and the developer may reasonably agree should be included in the Community Café Management Plan. <p>The developer shall implement and comply with the Community Café Management and Marketing Plan (or such revised plan as may be agreed between the parties in writing from time to time) for the duration that the Community Café is retained.</p> <p>The developer shall maintain ongoing records of:</p> <ul style="list-style-type: none"> - all bookings which have taken place, the names of the Community Café Users, the date and time of the booking and the type of event held; and - any bookings by Community Café Users cancelled by the owner, or any refusals to take bookings by the owner, including a record of the circumstances in which such cancellations and refusals occurred and the names of the Community Café Users involved; and shall make these records available to Council upon request. <p>Applicant's Position: Agreed</p>
Design: Retention of architectural team	
	<p>The ongoing involvement of the original design team (i.e. TP Bennett) shall be secured through the post-permission</p>

ARCHITECT NOVATION	stages of the design process up to the practical completion of the building. Applicant's Position: Agreed
Environmental	
GREENFIELD RUN OFF RATE UNDERPERFORM ANCE OFFSET	Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer is to contribute £366 for every cubic metre of offset attenuation storage needed to mitigate any failure to achieve run-off betterment. Applicant's Position: Agreed
BIODIVERSITY NET GAIN OFFSET	Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer is to contribute £85,000 for the net loss of 3.03 biodiversity units resulting from the development Applicant's Position: Agreed
Housing (conventional Class C3): Viability and affordable units	
AFFORDABLE HOUSING DELIVERY	Provision of 120 Class C3 affordable housing units on the site, comprising the following mix: <ul style="list-style-type: none"> - 65 units (4 x one-bedroom flats, 20 x two bedroom flats, 34 x three-bedroom flats, 7 x four bedroom flat) to be social rent tenure; and - 55 units (29 x one-bedroom flats, 24 x two bedroom flats, 2 x three-bedroom flats) to be shared ownership tenure. <p>The Agreement shall specify:</p> <ul style="list-style-type: none"> - which of these units is to be provided within each of the tenures (with a supporting drawing); - income thresholds for the affordable tenures; and - eligibility criteria for the affordable tenures. <p>Occupancy of the PBCL units shall be restricted to ensure early delivery of affordable housing units.</p> Applicant's Position: Agreed
ALL AFFORDABLE HOUSING UNITS:	An Early Stage Review Mechanism is to be triggered if substantial implementation has not occurred within 24 months of planning permission being granted.

EARLY STAGE REVIEW	<p>If the Early Stage Review concludes that additional affordable housing could viably be provided, the developer shall submit further details and calculations to substantiate the Additional Affordable Housing Contribution payable in lieu of onsite provision of additional affordable housing units.</p> <p>Occupancy of the PBCL units shall be restricted until the Additional Affordable Housing Contribution has been paid to the Council.</p> <p>Applicant's Position: Agreed</p>
SOCIAL RENT UNITS: TRANSFERRAL TO A REGISTERED PROVIDER	<p>Within an agreed timeframe, the developer is to submit to the Council the name of the chosen Registered Provider.</p> <p>The affordable housing units are, upon their completion, to be handed over to the Registered Provider.</p> <p>Applicant's Position: Agreed</p>
SOCIAL RENT UNITS: SERVICE CHARGES	<p>The service charge for the social rent housing units shall be:</p> <ul style="list-style-type: none"> - determined in accordance with the 'Direction for Rent Standard'; and - limited to an increase of CPI + 1% per annum or such other limit imposed by Government regulation and/or direction (whichever is less). <p>Applicant's Position: Not yet agreed</p>
INTERMEDIATE UNITS: MARKETING AND DISPOSAL	<p>Developer is to undertake suitable marketing of the intermediate units throughout the duration of the Intermediate Housing Pre-Completion Marketing Period and the Intermediate Housing Marketing Period to households within Southwark's local income thresholds.</p> <p>Disposal of any of the intermediate units shall be permitted to higher London Plan income households only if at the end of the Marketing Period there has not been uptake. Evidence of no uptake is to be supplied to the Council before disposal to higher income households is permitted.</p> <p>Applicant's Position: Agreed</p>
ALL AFFORDABLE	<p>Contribution of £15,900, based on 120 dwellings at £132.50 per dwelling, towards the Council's costs for monitoring affordable housing delivery.</p>

HOUSING UNITS: MONITORING	<p>Developer is to complete the Council's Housing Delivery Monitoring Tables at approval, commencement, completion and any amendment stages.</p> <p>Developer is to the complete the Affordable Housing Survey, and support it with evidence as necessary, within 28 days of receiving the survey from the Council.</p> <p>Applicant's Position: Agreed</p>
Housing (PBCL): Tenancies, management and other restrictions	
TERMS OF PBCL TENANCIES	<p>The occupiers of the PBCL units shall enjoy all services and facilities connected to the PBCL premises as part of their rent, with the exception of utility bills and council tax for individual units (which may be included in the rent at the discretion of the Owner).</p> <p>Applicant's Position: Agreed</p>
FINAL PBCL OPERATIONAL MANAGEMENT PLAN	<p>Prior to occupation of the PBCL, a Final Operational Management Plan shall be submitted to and approved by the Local Planning Authority. It shall be based on the principles established by the application-stage Operational Management Plan, but with appropriate updates, and shall include (but not be limited to) the following details:</p> <ul style="list-style-type: none"> - security and fire safety procedures; - move in and move out arrangements; - how all internal and external areas of the development will be maintained; - how communal spaces and private units will be cleaned and how linen changing services will operate; - how deliveries for servicing the development and residents' deliveries will be managed. <p>The approved Final Operational Management Plan (as amended from time to time) shall be complied with throughout the lifetime of the development.</p> <p>Applicant's Position: Agreed</p>
RETENTION AND SINGLE MANAGEMENT OF PBCL PREMISES	<p>The PBCL premises (the units and all shared and ancillary facilities), shall be retained as a rental product which cannot be sold off as individual units, nor at any time be used as self-contained accommodation (hotel, aparthotel, hostel or similar).</p>

	<p>All communal amenity facilities (internal and external) within the PBCL as approved shall be retained for the lifetime of the development, and shall not be used for any purpose other than free-to-access communal amenity space for all PBCL residents.</p> <p>The PBCL premises shall be at all times managed by a single management company.</p>																					
	Applicant's Position: Agreed																					
Housing (conventional Class C3): Occupier facilities																						
WHEELCHAIR HOUSING DELIVERY	Provision of 12 Wheelchair Accessible housing units within the South Building in accordance with the table below.																					
	<table border="1"> <thead> <tr> <th>Level</th> <th><u>Location(s) within floorplan [and tenure]</u></th> <th><u>Total no.</u></th> </tr> </thead> <tbody> <tr> <td>01</td> <td>x2 2b4p in the parkside tower [both S.R]</td> <td>2</td> </tr> <tr> <td>02</td> <td>x2 2b4p in the parkside tower [both S.R]</td> <td>2</td> </tr> <tr> <td>03</td> <td>x2 2b4p in the parkside tower [both S.R]</td> <td>2</td> </tr> <tr> <td>04</td> <td>x2 2b4p in the parkside tower [S.R]; x1 3b5p in the parkside tower [both S.R]; x1 1b2p in the Zampa Road tower [Int]</td> <td>4</td> </tr> <tr> <td>05</td> <td>x1 1b2p in the parkside tower [S.R.]; x1 2b4p in the Zampla Road tower [Int]</td> <td>2</td> </tr> <tr> <td colspan="3"><i>Tenure breakdown: x10 SR w/c units and x 2 Int w/c units</i></td> </tr> </tbody> </table>	Level	<u>Location(s) within floorplan [and tenure]</u>	<u>Total no.</u>	01	x2 2b4p in the parkside tower [both S.R]	2	02	x2 2b4p in the parkside tower [both S.R]	2	03	x2 2b4p in the parkside tower [both S.R]	2	04	x2 2b4p in the parkside tower [S.R]; x1 3b5p in the parkside tower [both S.R]; x1 1b2p in the Zampa Road tower [Int]	4	05	x1 1b2p in the parkside tower [S.R.]; x1 2b4p in the Zampla Road tower [Int]	2	<i>Tenure breakdown: x10 SR w/c units and x 2 Int w/c units</i>		
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	Applicant's Position: Agreed																					
INTERMEDIATE UNITS: WHEELCHAIR HOUSING MARKETING	<p>Suitable marketing shall be carried out for the requisite period.</p> <p>No disposal of any of the wheelchair accessible unit to those not in need of wheelchair housing; if one or more units are not disposed of by the end of the marketing period, the unit(s) shall be used by the Council as local authority temporary accommodation until an eligible</p>																					

	<p>person in need of wheelchair housing has entered into an agreement for lease in respect of the relevant unit.</p>
	<p>Applicant's Position: Agreed</p>
<p>CHILDREN'S PLAY SPACE: DETAILED SPECIFICATION</p>	<p>Prior to implementation, the developer is to submit and receive the Council's approval of a detailed specification for the Children's Play Space. This shall include the provision of water and sand play facilities within the Pocket Park and on the roof (at the very least at podium level) of the South Building.</p>
	<p>Applicant's Position: Agreed</p>
<p>COMMUNAL AMENITY SPACE AND CHILDREN'S PLAY SPACE: MANAGEMENT STRATEGY</p>	<p>Prior to occupation of any of the Class C3 housing units, the developer is to submit a Communal Amenity Space and Children's Play Space Management Strategy which shall include:</p> <ul style="list-style-type: none"> - a strategy for providing, maintaining and cleaning the outdoor communal amenity space and the children's play space; - the access arrangements; - the hours of opening, which shall be between 06:30 and 22:30 on all days of the week 365 days a year except during temporary maintenance work; - a strategy to ensure all residents of the development have the ability to access all communal spaces and all children's play space on all levels of the South Building (i.e. levels 3, 5, 9 and 15), irrespective of the tenure of their dwelling and/or the block in which their dwelling is located, in a fair and equitable way; - a methodology to ensure the outdoor communal amenity space and children's play space is provided free of charge to all residents of the development except for the payment of a reasonable service charge.
	<p>Applicant's Position: Agreed</p>
<p>COMMUNAL AMENITY SPACE AND CHILDREN'S PLAY SPACE: DELIVERY</p>	<p>Prior to occupation of any of the Class C3 housing units, the children's play space and the communal amenity space shall be completed and available for use.</p>
	<p>Applicant's Position: Agreed</p>
<p>Housing (PBCL): Occupier facilities</p>	

WHEELCHAIR PBCL UNITS DELIVERY	Provision of 61 wheelchair PBCL units within the North Building, in accordance with the table below:		
	<u>Level(s)</u>	<u>Location(s) within floorplan</u>	<u>Total no.</u>
	02, 03 and 04	x9 units in the north tower; x2 units in the central wing; x6 units in the parkside tower	51
	07, 10, 13, 16, 20 and 23,	x1 unit in the parkside tower	6
	08, 11, 14, and 17	x1 unit in the north tower	4
Applicant's Position: Agreed			
WHEELCHAIR PBCL UNITS MARKETING	Suitable marketing of the PBCL wheelchair units shall be carried out for the requisite period before the units can be released to non-disabled prospective residents.		
	Applicant's Position: Agreed		
Local economy: Employment and training			
CONSTRUCTION PHASE JOBS/ CONTRIBUTIONS	The development must: <ul style="list-style-type: none"> - deliver 95 sustained jobs to unemployed Southwark residents; - deliver 95 short courses; and - support 23 construction industry apprentices during the construction phase. Or make the pro-rata Employment and Training Contribution which, at maximum, would be £457,250 . This breaks down as: <ul style="list-style-type: none"> - £408,500 against sustained jobs; - £14,250 against short courses; and - £34,500 against construction industry apprenticeships. 		
	Applicant's Position: Agreed		
The Plan would be expected to detail:			

CONSTRUCTION PHASE EMPLOYMENT, SKILLS AND BUSINESS PLAN	<ul style="list-style-type: none"> - methodology of training, skills, support etc.; - targets for construction skills and employment outputs; - methodology for delivering apprenticeships; and - local supply chain activity methodology. 		
	Applicant's Position: Agreed		
LONDON LIVING WAGE	The developer shall use reasonable endeavours to pay those who work on site (except in relation to volunteers, apprentices and interns) no less than the LLW.		
	Applicant's Position: Agreed		
Local economy: Affordable workspace			
QUANTUM AND LOCATION	<p>The dedicated affordable workspace is to comprise:</p> <ul style="list-style-type: none"> - Unit 5 (South Building): c.144 sq.m; and - Unit 6 (South Building): c.190 sq.m. <p>All ancillary and servicing areas are to be available to the relevant affordable workspace occupants on the same terms/basis as the market office occupiers, and at no cost additional cost to the capped rent level.</p>		
	Applicant's Position: Agreed		
MINIMUM SPECIFICATION OF UNIT(S)	<p>Prior to first occupation, the affordable workspace is to be provided to the Council's minimum specification. It prescribes the standards of:</p> <ul style="list-style-type: none"> - Fit-out (floor, ceiling, windows, doors, power, lighting etc.) specification at point of occupancy; - Telecommunications; - Means of escape; - Lifts; - Delivery/servicing arrangements; - Cycle Storage; and - Regulations (DDA etc.) compliance. 		
	Applicant's Position: Agreed		
KEY TERMS OF LEASE	Lease agreements with all affordable workspace occupiers shall be subject to these conditions:		
	<table border="0" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;">Rent level and any inclusions/exclusions</td> <td style="vertical-align: top;"> <ul style="list-style-type: none"> - 0-11 months at peppercorn rent; - 12 months until the end of the affordable workspace lifetime at no more than £15 per square </td> </tr> </table>	Rent level and any inclusions/exclusions	<ul style="list-style-type: none"> - 0-11 months at peppercorn rent; - 12 months until the end of the affordable workspace lifetime at no more than £15 per square
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	<p>foot net lettable area per annum;</p> <p>all to be exclusive of any rates but inclusive of service and building management charges (Indexed Linked from date of Agreement).</p>
Break clause	<p>For both the landlord and the tenant:</p> <ul style="list-style-type: none"> - a 2 year break on a minimum 5 year lease; - a 1 year break on a minimum 2 year lease.
	<p>The rental levels and break clauses referred to above are to be routinely offered to all new tenants throughout the lifetime of the affordable workspace, not just the initial tenant(s).</p>
	<p>Applicant's Position: Agreed</p>
LIFETIME	<p>The affordable workspace is to be provided for a fixed term commencing upon first operation of the affordable workspace unit in question and terminating no sooner than 30 years (without unnecessary interruption) thereafter.</p>
	<p>Applicant's Position: Agreed</p>
TENANT ELIGIBILITY	<p>Eligible tenants are to be, as per the definition given in the Southwark Plan 2022, from a specific sector that has a social, cultural or economic development purpose.</p> <p>Priority must be given to pre-existing organisations based within the borough.</p> <p>The Affordable Workspace Provider is to retain discretion over the selection of the eligible tenants that take leases within the affordable workspace areas.</p>
	<p>Applicant's Position: Agreed</p>
AFFORDABLE WORKSPACE STRATEGY	<p>Prior to first occupation of any affordable workspace, an Affordable Workspace Strategy shall be submitted to and approved by the Council, setting out:</p> <ul style="list-style-type: none"> - how the workspace is of a type, and has been designed to a specification, that meets local demand;

	<ul style="list-style-type: none"> - a marketing strategy that prioritises small and independent businesses from the local area with an identified need; - evidence of collaboration with partners and stakeholders to identify businesses nominated for occupation; - how various different occupiers and their needs could be accommodated; - lease/licence terms and details; - the facilities for the occupiers (to include at least kitchen, toilet and printing facilities, charging points and high speed internet); - any business incubation support that will be offered to start-ups; - other details as the Council may reasonably require.
	Applicant's Position: Agreed
Local economy: Commercial units use class restrictions	
RESTRICTION ON HOT FOOD TAKEAWAYS, BETTING SHOPS, PAWN BROKERS AND PAY DAY LOAN SHOPS	None of the six commercial units shall, notwithstanding any changes to the use classes order or alterations/revocations to the Article 4 Direction that applies in this location, be used as a hot food takeaway, betting shop, pawn broker or pay day loan shop.
	Applicant's Position: Agreed
Landscape and public realm: Publicly-accessible on-site open space	
DETAILED DESIGN	<p>Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer is to submit a Publicly-accessible Open Space Specification for all areas of privately-owned publicly-accessible open space to the Local Planning Authority (who shall liaise with the Highways Authority) and receive its approval in writing.</p> <p>The Specification shall demonstrate that the publicly-accessible open space has been designed to an adoptable standard (in accordance with the SSDM) and shall comprise:</p> <ul style="list-style-type: none"> - detailed drawings; - details of planting, furniture, external lighting, CCTV, any boundary enclosures and entry gates; - finishes schedules and samples of proposed materials;

	<ul style="list-style-type: none"> - demonstration that principles of Secured by Design have been incorporated; and - details of the phasing and timing for delivery.
DELIVERY AND SHORT-TERM MANAGEMENT	<p>Applicant's Position: Agreed</p> <p>Upon receipt of a Provisional Completion Certificate from the Council, the developer shall make the publicly-accessible open space available to the public (in accordance with the access hours and permitted rights of closure).</p> <p>Any defects within the first 12 months of opening are to be rectified by the developer.</p> <p>At the end of the initial 12 month period, the developer is to seek and receive from the Council a Final Completion Certificate.</p>
LONG-TERM MANAGEMENT	<p>Applicant's Position: Agreed</p> <p>No part of the development shall be occupied until the developer has submitted to and received approval from the Council of an Estate Management Plan relating to all Publicly-accessible Open Space (PaOS) within the site. The Estate Management Plan shall:</p> <ul style="list-style-type: none"> - detail the maintenance, cleaning and renewal arrangements of the PaOS in relation to <ul style="list-style-type: none"> • all sustainable (SuDS) infrastructure (to include access and maintenance information); • soft and hard finishes; • furniture; and • lighting; - set out a methodology to ensure the PaOS is kept free from obstruction as far as is practical during any maintenance and cleaning of all buildings and structures within/around the development, with details of how any unavoidable disruption/ obstruction will be minimised in impact and duration; - demonstrate accordance with the Public London Charter LPG; and - include the name of the person(s) responsible for ensuring the effective provision of the PaoS as public realm. <p>Applicant's Position: Agreed</p>

HOURS OF ACCESS	<p>The publicly-accessible open spaces shall be open to the general public 24 hours a day every day of the week including Bank Holidays (with the exception of the rights of closure detailed below).</p> <p>Applicant's Position: Agreed</p>
RIGHTS OF CLOSURE	<p>The developer shall be entitled to close the publicly-accessible realm (with prior notification to members of the public) for up to one day per year so as to prevent public rights of way being obtained.</p> <p>Applicant's Position: Agreed</p>
Landscape and Public Realm: Off-site Public Open Space and Trees	
PAT HICKSON PARK MAINTENANCE CONTRIBUTION	<p>Prior to first occupation of any part of the development, the developer is to contribute £25,000 (index linked) towards the costs of maintaining Pat Hickson Park, required because of the increased use of the park by occupiers of the development.</p> <p>Usage by the Council's Parks Team of the £25,000 will be permitted only once the five-year period following first opening of the park has elapsed (Network Rail is covering the maintenance costs during the initial five-year period).</p> <p>Applicant's Position: Agreed</p>
PUBLIC OPEN SPACE SHORTFALL OFFSET	<p>Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer is to contribute £200,900 (index linked) towards investment in new and existing public open spaces within the Old Kent Road Opportunity Area, required because of the proposal's failure to fully meet on-site its own public open space yield (calculated having regard to the 630 square metres that would be provided on-site).</p> <p>Applicant's Position: Agreed</p>
TREE LOSS PAYMENT	<p>In the event that any of the proposed trees cannot be delivered, the developer is to pay to a sum of £6,000 (CAVAT index linked from the year 2019) per undelivered tree.</p> <p>Applicant's Position: Agreed</p>

Previous permission	
SURRENDER COVENANT	Covenant requiring the owner to 'give up' the right to develop under the existing planning permission (ref. 18/AP/2497).
	Applicant's Position: Agreed
Transport: Construction phase mitigation	
CONSTRUCTION MANAGEMENT MONITORING	<p>Prior to implementation, the developer is to contribute £12,880 (index linked), based on £40 per C3 residential unit and £40 for every three PBCL units, to cover the cost incurred by the Council's Highways Network Management division in providing the following services:</p> <ul style="list-style-type: none"> - monitoring the construction-related activities associated with the development; - monitoring the cumulative impacts of those activities on the surrounding highways and local environment, together with the other construction activities on nearby sites; and - ensuring compliance with the approved CEMP throughout the duration of the build programme.
	Applicant's Position: Agreed
Transport: Development mitigation	
TfL DOCKING STATION CONTRIBUTION	Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer is to contribute £16,083.33 (index linked) towards expansion of one or more TfL cycle docking stations in the vicinity of the site.
	Applicant's Position: Agreed
TfL LEGIBLE LONDON SIGNAGE	Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer is to contribute £30,000 (index linked) towards provision of new Legible London signage and/or and to enhance existing Legible London signage on the site and/or within the vicinity.
	Applicant's Position: Agreed
TfL BUS STOP RELOCATION	Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer shall submit evidence to the Council

	<p>that an agreement has been reached with TfL with regard to the detailed design and delivery of a TfL bus stop and shelter on the Ilderton Road boundary of the site.</p> <p>The location and arrangement of the bus stop and shelter shall be generally in accordance with the detailed plan '226636/PD14' supplied as part of the planning application (unless otherwise agreed with TfL).</p>
	<p>Applicant's Position: Agreed</p>
<p>LONG-TERM PROVISION OF CYCLE SHARE SCHEME</p>	<p>Prior to occupation of any part of the PBCL, a Cycle Share Scheme comprising no fewer than 45 cycles shall be provided and all PBCL occupants shall benefit from access to this. Thereafter, and for the lifetime of the development, free-of-charge access to the Cycle Share Scheme shall be available to the residents of the PBCL units, and the facilities (including the cycles themselves) shall be kept in good working order.</p>
	<p>Applicant's Position: Agreed</p>
<p>CAR CLUB MEMBERSHIP</p>	<p>Prior to occupation of any part of the housing/PBCL elements of the development, a contract shall be entered into with a Car Club Operator that secures membership as follows:</p> <ul style="list-style-type: none"> - to new residents of each Class C3 dwelling within the development (minimum duration of membership for each resident is to be 3 years); and - to new residents of each PBCL unit within the development, offered for the first 3 years following completion and occupation of the development (minimum duration of membership for each resident is to be 1 year).
	<p>Applicant's Position: Agreed</p>
<p>DELIVERY AND SERVICING MONITORING PLAN</p>	<p>Prior to occupation of any part of the development, a Delivery and Servicing Monitoring Plan is to be submitted to and approved by the Council. The Delivery and Servicing Monitoring Plan shall set out the method for monitoring and recording the number of servicing and delivery trips to and from the development.</p>
	<p>Applicant's Position: Agreed</p>

<p>DELIVERY AND SERVICING MANAGEMENT BOND</p>	<p>Prior to occupation of any part of the development, a Delivery and Servicing Bond is to be paid to the Council. The bond will be £33,166.66, comprising:</p> <ul style="list-style-type: none"> - a cash deposit of £31,566.66 (index linked), calculated on the basis of £100 per three bedspaces; and - a monitoring fee of £1,600 to cover the Council's costs of assessing the quarterly monitoring. <p>For a period of two years from occupation of 75% of the PBCL premises the daily vehicular servicing activity of the site is to be monitored (in accordance with the approved Delivery and Servicing Monitoring Plan) and returns made in accordance with the agreed sampling periods. If the site meets or betters its own baseline target the Delivery and Servicing Management Cash Deposit will be returned to the developer within 6 months of the end of the monitoring period. If the site fails to meet its own baseline the cash deposit will be made available for the Council to utilise for sustainable transport and highways remediation projects in the ward of the development.</p> <p>Irrespective of whether the development meets or fails to meet its baseline target, the Council will retain the monitoring fee.</p> <p>Applicant's Position: Agreed</p>
<p>ACTIVE TRAVEL IMPROVEMENTS CONTRIBUTION</p>	<p>Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer is to contribute £100,000.00 (index linked) for use by the Council and TfL in improving pedestrian and cyclist experience and infrastructure in the vicinity of the site, in accordance with Active Travel policies.</p> <p>The works shall specifically relate to improving the pedestrian and cyclist experience on Zampa Road on the approach to the junction with Ilderan Road, specifically:</p> <ul style="list-style-type: none"> - Widening of footways where possible on all arms to provide additional pedestrian waiting space and reduce crowding; - realignment of the pedestrian crossing on the Zampa Road arm to meet with the prevailing desire line for pedestrians; and - the introduction of pedestrian countdown timers. <p>Applicant's Position: Agreed</p>

BUS SERVICES CONTRIBUTION	<p>Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer is to contribute £869,400.00 (BCIS index linked from 2019) towards TfL bus service improvements, and any necessary associated transport and public realm improvements, in the vicinity of the site.</p> <p>Applicant's Position: Agreed</p>
FUTURE CPZ IMPLEMENTAT'N CONTRIBUTION	<p>Prior to occupation of any part of the development, the developer is to contribute £TBC (index linked) towards the costs of establishing a CPZ in the vicinity of the site.</p> <p>Applicant's Position: To be confirmed, pending clarification from the Council's Transport Policy Team and Parking Team of the exact contribution</p>
FUTURE CPZ PARKING PERMIT EXEMPTION	<p>None of the PBCL occupants, Class C3 housing occupants and tenants of the commercial space at the development shall be eligible for parking permits within any existing or proposed CPZ in the Borough.</p> <p>Applicant's Position: Agreed</p>
PBCL WASTE MANAGEMENT	<p>For the lifetime of the PBCL premises, the owner shall ensure that a contract is in place with a commercial provider of refuse/recycling collection services.</p> <p>Applicant's Position: Agreed</p>
Highway impacts mitigation	
BOROUGH ROAD NETWORK: SCOPE OF S278 WORKS	<p>Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer is to submit the Section 278 Highway Works Specification, detailed design and estimated costs to the Local Planning Authority (who shall liaise with the Highways Authority) and receive its approval in writing. The Specification shall be based on a Road Safety that has been submitted to and agreed by the Highways Authority.</p> <p>This Specification, detailed design and estimated costs shall comprise the following works, and all shall be constructed in accordance with SSDM standards:</p> <ul style="list-style-type: none"> - repave the footway including new kerbing fronting the development on Ilderton Road and Zampa Road (London Borough of Southwark);

	<ul style="list-style-type: none"> - deliver two fully inset loading bays on the eastern side of Ilderton Road; - deliver a car club bay on Verney Way (or an agreed alternative location in liaison with the Council's Highways Development Management division and the Council's Parking Team); - deliver a TfL bus stop on Ilderton Road in general accordance with the details endorsed by TfL (a copy of such details to be submitted to the Council under a separate Section 106 Agreement obligation). - construct all crossovers as approved in the planning application, and eliminate any redundant ones; - provide access arrangements (e.g. dropped kerbs) for refuse collection; - improve pedestrian crossings in the vicinity of the development, including any raised crossings and raised junctions if required; - install any parking / loading signs on the building walls when possible to improve footway widths (otherwise, post and signs should be installed at the back of the footway); - remove any redundant and unnecessary post and signs fronting the development; - promote all necessary Traffic Regulation Orders (TMOs) to amend any parking controls and any amendments to existing waiting and loading restrictions, to include double yellow lines 'with blips' along Ilderton Road; - refresh road markings following kerb installation; - repair any damage to the highway (including any inspection covers and street furniture) due to construction activities connected with the development including construction work and the movement of construction vehicles; - upgrade street lighting to current LBS standards; and - investigate the possibility of providing lamp columns mounted to the building in order to improve effective footway widths.
	Applicant's Position: Agreed
BOROUGH ROAD NETWORK: S278	Prior to commencement of the agreed highway works, the developer is to enter into a Highway Agreement under Section 278 (and Section 38).

AGREEMENT DEADLINE	Applicant's Position: Agreed
BOROUGH ROAD NETWORK: S278 DETAILED DESIGN	<p>Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer is to submit the 'Highway Works Specification and Estimated Costs' for approval.</p> <p>Prior to Implementation, an Approval in Principle (AIP), relating specifically to the basement element of the proposed development, shall be submitted to and received approval from the Local Planning Authority (who shall liaise with Council's Highways Structures Team).</p>
	Applicant's Position: Agreed
Energy and sustainability	
FUTURE-PROOFED CONNECTION TO DISTRICT HEAT NETWORK	<p>Prior to occupation, a DHN 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 DHN.</p>
	Applicant's Position: Agreed
CARBON OFFSET PAYMENT 1	<p>The development as built is to achieve the carbon reduction set out in the submitted Application Stage Energy Strategy.</p> <p>Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer shall pay an off-site contribution of 50% of the total application stage predicted carbon shortfall (123.26 tonnes/CO₂). This equates to 61.63 tonnes/CO₂. Calculated applying the Council's current tariff rate of £95/tonne for 30 years, this is £175,669.00 (index linked).</p>
	Applicant's Position: Agreed
CARBON OFFSET PAYMENT 2	<p>Prior to occupation of the development, the owner shall submit an Occupation Stage Energy Strategy to the Council for approval.</p> <p>The Occupation Stage Energy Review shall demonstrate how the development will achieve the Agreed Carbon Targets in accordance with the principles contained in the Application Stage Energy Strategy.</p>

	<p>In the event that the Occupation Stage Energy Review demonstrates the application stage predicted savings have been met or exceeded, the applicant shall pay the Carbon Green Fund Contribution 2 (thereby fully offsetting the differential between on-site as-built carbon savings and net zero). The sum shall be calculated applying the Council's carbon offset tariff in place at that time. Only following receipt of the Carbon Green Fund Contribution 2 will the Council issue its approval in writing.</p> <p>In the event that the Occupation Stage Energy Review demonstrates the as-built scheme falls short of the application stage predicted savings, the applicant shall accompany their submission with an Energy Strategy Addendum setting out additional energy efficiency proposals to achieve the Agreed Carbon Targets. If the Council agrees to the proposed additional measures, the owner shall implement all of the measures within six months of the Council's approval of the Addendum. If the Council and owner cannot come to an agreement on the proposed additional measures, the owner shall pay a further carbon offset contribution (to be calculated applying the Council's carbon offset tariff in place at that time) within 28 days of the Council issuing their request.</p> <p>The Occupation Stage Energy Review shall be complied with in completing and occupying the development.</p> <p>Applicant's Position: Agreed</p>
BE SEEN MONITORING	<p>Prior to occupation of the development, the owner shall submit to the GLA and the Council accurate and verified estimates of the 'Be Seen' energy performance indicators.</p> <p>On the first anniversary of occupation or following the end of the Defects Liability Period (whichever is the later) and at least for the following four years after that date, the Owner shall submit to the GLA accurate and verified annual in-use energy performance data for all relevant indicators.</p> <p>In the event that the 'in-use stage' evidence shows that the 'as-built stage' performance estimates have not been or are not being met, the owner shall identify the causes of underperformance and the potential mitigation measures. The owner shall submit to the GLA and the Council a Be Seen Mitigation Measures Plan comprising of measures that are reasonably practicable to implement, along with a proposed timescale for implementation. The measures shall be implemented in</p>

	accordance with the approved Be Seen Mitigation Measures Plan.
	Applicant's Position: Agreed
Administration	
Monitoring	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

725. In the event that a satisfactory legal agreement has not been entered into by 7 May 2024, it is recommended that the director of planning and growth refuses planning permission, if appropriate, for the following reason:

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

Mayoral and Borough Community Infrastructure Levies

726. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material "local financial consideration" in planning decisions. The requirement for payment of the Mayoral or Borough CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport investments in London as a whole, while the Borough CIL will provide for infrastructure that supports growth in Southwark.
727. The gross amount of CIL is approximately £14,131,169.03 (pre-relief). Subject to the correct CIL forms being submitted on time, CIL Social Housing Relief of approximately £4,728,657.67 can be claimed. Thus, the resulting CIL amount is estimated to be £9,402,511.36 (net of relief). It should be noted that this is an estimate, and the floor areas on approved drawings will be checked when the related CIL Assumption of Liability and Relief Claim Forms Form are submitted, after planning approval has been obtained.

Development description

728. The proposed development was originally:

“Redevelopment of the site to provide two separate buildings comprising large scale purpose built shared living (LSPBSL) units, conventional residential dwellings, flexible commercial and community floorspace, a not-for-profit café community use, children's playspace, public realm improvements, landscaping and other associated works.

For information: the proposed development comprises a building of 27 storeys plus additional rooftop plant (54.64 metres above ground level, 91.73 metres above (Ordnance Datum) and a building of 15 storeys plus additional rooftop plant (50.80 metres above ground level, 52.00 metres above Ordnance Datum), with each building containing a single storey basement. The development would deliver:

- 609 LSPBSL units;*
- 118 affordable conventional residential dwellings;*
- 1,023 square metres GIA of flexible commercial and community floorspace (Class E/F), of which a portion would be affordable;*
- 124 square metres GIA of not-for-profit café community use (Class E/F);*
- children's playspace and public realm improvements; and*
- other associated works incidental to the development”.*

729. A development description of the same format, but with key details amended as appropriate, was used to publicise the planning application as part of the re-consultation undertaken in June 2023.
730. Post re-consultation, the Local Planning Authority and applicant agreed to simplify the development description (refer to the title block of this report for the exact wording). Separately, Condition 1 (Scope of Works) of the draft decision notice describes the key elements of the proposal in more detail, including with use class references.
731. This arrangement of an accurate but simplified development description supported by a more specific Scope of Works condition responds to the Court of Appeal's reversal of the High Court's decision in *Finney v Welsh Ministers* [2019] EWCA Civ 1868. It will enable the applicant to seek amendments to the extant consented proposal by varying Condition 1 (under Section 73 of the Town and Country Planning Act) without any risk of the sought variation conflicting with the development description. Had the development description remained in its original very detailed format, any changes the applicant later wished to make falling outside the wording of the operative part of the grant would have necessitated the submission of a fresh full planning application.

Community involvement and engagement

732. This application was accompanied by a Statement of Community Involvement, confirming the public consultation that was undertaken by the applicant during the pre-application phase. The table below summarises this consultation:

<u>Consultation Undertaken by Applicant: Summary Table</u>	
<u>Date</u>	<u>Form of consultation</u>
Meetings (Pre-application engagement)	
June 2022	Meeting held with the Cabinet Member for the Climate Emergency and Sustainable Development.
Public Consultation Events (pre-application phase)	
July 2021	<ul style="list-style-type: none"> • E-letter sent to key local stakeholders, businesses and community groups, introducing the applicant and inviting them to a meeting. • Meeting held with Southwark Studios. • 4-page newsletter delivered to approximately 2885 addresses around the site. • Emails sent via Campaign Monitor to key local stakeholders to inform them of the launch of the dedicated project website and inviting them to provide feedback.
August 2022	<ul style="list-style-type: none"> • Email sent to the identified Community Investment Programme stakeholders, informing them about the proposals and inviting them to a meeting. • Door-knocking session undertaken primarily at the homes on the Bonamy and Bramcote Estate, close to the site, on two separate occasions (the 10th and the 18th). • Pop-up session held at South Bermondsey Station.
September 2022	<ul style="list-style-type: none"> • Pop-up session held at Bramcote Park. • Attempts made to contact Christ Apostolic Church. • Meeting held with CEO of Millwall Football Club and VSCO Officer from Community Southwark, a representative of Southwark Travellers' Action Group and the Southwark Law Centre. • 2-page flyer distributed to approximately 2885 addresses around the site, inviting them to attend one of the upcoming public exhibitions.
October 2022	<ul style="list-style-type: none"> • Public exhibition held at Millwall Community Trust, Bolina Road on 4th October and 6th October.

	<ul style="list-style-type: none"> • Door-knocking session held at the homes on the Bonamy and Bramcote Estate (on the 6th). • Meeting held with the CIRCLE Collective. • Follow-up meeting held with VSCO Officer from Community Southwark.
November 2022	<ul style="list-style-type: none"> • Meeting held with representative of the Bonamy and Bramcote Tenants and Residents Association. • Door-knocking session undertaken at the homes on the Bonamy and Bramcote Estate. • Meeting held with Roosters Rotherhithe Boxing Club.
January 2023	<ul style="list-style-type: none"> • Meeting held with the Bonamy and Bramcote TRA. • Meeting held with Ilderton Road Primary School.

733. Included within the Statement of Community Involvement are the consultation materials that were circulated as part of the pre-application engagement exercise. A summary of each topic raised by the community feedback is also provided, along with details of how the applicant responded.
734. The pre-application consultation undertaken by the applicant was an adequate effort to engage with those affected by the proposals.
735. Although no direct community engagement was undertaken by the application at the planning application stage, following closure of the Council's public consultation process, the applicant prepared a 'response' letter together with additional documentation addressing the matters raised. The extent and format of application stage community engagement is considered adequate.
736. The Council, as part of its statutory requirements, sent letters to surrounding residents, issued a press notice publicising the planning application and displayed notices in the vicinity of the site. Re-consultation letters were issued to all those who commented as part of the original round of consultation. Details of the consultation undertaken by the Council are set out in the appendices. The responses received are summarised earlier in this report.

Consultation responses from external consultees

Argiva

737.
 - No objection/comments.
 - **Officer response:** Noted.

Bakerloo Line Extension Safeguarding Unit

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

City Airport

739. • Did not wish to comment.

City of London

740. • Did not wish to comment.

Civil Aviation Authority

741. • Did not wish to comment.

Environment Agency

742. • Conditions relating to Contamination Remediation, Contamination Verification, and a Piling Statement should be secured.
- **Officer response:** The recommended conditions have been attached to the draft decision notice.

Heathrow Airport

743. • Did not wish to comment.

Historic England

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

London Borough of Lambeth

745. • Did not wish to comment.

London Borough of Lewisham

746. • Lewisham Council understands the proposed development is generally consistent with the original scheme approved for the site, 18/AP/2497, and no significant changes are proposed in terms of massing, layout or density which may substantially impact on surrounding development.
- **Officer response:** Noted.
- The Daylight and Sunlight Report submitted as part of the planning application does not consider the Surrey Canal Triangle scheme. This is important as the Surrey Canal Triangle scheme includes residential uses within close proximity to the proposed scheme, particularly Phase 5 along Bolina Road.

- **Officer response:** The applicant's Daylight and Sunlight Report does take into account the Surrey Canal Triangle scheme, and the effects are detailed in the relevant earlier part of this report. The impacts are considered to be acceptable, and broadly similar to those produced by the extant scheme, 18/AP/2497.
- Lewisham Council would expect the development to make a proportionate contribution to any highways / pedestrian and cycling improvements required arising from the proposed scheme as part of a Section 106 financial contribution or Section 278 highway works.
 - **Officer response:** Improvement works have been agreed with the applicant, which will be partly delivered by way a Section 106 financial contribution and partly through Section 278 highway works. Some of the works agreed works will improve the pedestrian and cycle experience for those using Zampa Road, which is the route closest to the site that provides a connection to Lewisham.

London Fire Brigade

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

Metropolitan Police

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

National Air Traffic Services (NATS) Safeguarding

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

Natural England

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

Network Rail

751. • Comments, but no objections or recommended conditions/informatives.
 - **Officer response:** Noted.

Thames Water

752. • Piling Method Statement must be secured by condition, along with a pre-occupation condition relating to local waste capacity. Some informatives are recommended

- **Officer response:** Noted. The recommended conditions and infomatives have been attached to the draft decision notice.

Transport for London (TfL) – Active Travel England

- 753.
- No objection/comments.
 - **Officer response:** Noted.

Transport for London (TfL) – London Underground / Docklands Light Railway Infrastructure Protection

- 754.
- No objection/comments.
 - **Officer response:** Noted.

Tower Hamlets Council

- 755.
- Did not wish to comment.

UKPN

- 756.
- No objection/comments.

Westminster Council

- 757.
- Did not wish to comment.

Community impact and equalities assessment

758. 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.

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

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

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

- Accessible accommodation: 10% of the PBCL and 10% of the conventional homes would be wheelchair accessible, as would all of the ancillary and common spaces within the host buildings.
- Employment and training opportunities: Local unemployed people would benefit from jobs and training opportunities connected with the construction stage.
- Improved and more accessible public realm: The proposed public realm, as well as the agreed improvements to footways and highways within the vicinity of the site, would all be designed to assist people with mobility impairments. Physical measures such as level or shallow gradient surfaces and dropped kerbs would benefit disabled and older people in particular.
- Landscape: Outdoor furniture and outdoor lighting has been designed to create comfortable environments in which people of all ages will want to dwell, while planting and play environments would create sensory and tactile spaces particularly supportive of those with certain disabilities.
- Transport: Wheelchair parking spaces and cargo bike spaces (the latter being capable of transporting disabled users) would also provided.
- Public safety: Safer public spaces (through the various proposed active and passive security and surveillance measures) would benefit all groups, but in particular older people, disabled people and women. Cycle stores and entrances would be secure-accessed, well naturally surveilled and lobbied to prevent tail-gaiting, complemented by CCTV surveillance.

762. Officers are satisfied that equality implications have been carefully considered throughout the planning process and that Members have sufficient information available to them to have due regard to the equality impacts of the proposal as required by Section 149 of the Equality Act 2010 in determining whether planning permission should be granted.

Human rights implications

763. 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.

764. This application has the legitimate aim of redeveloping the site to provide two separate buildings comprising large scale purpose built shared living units, conventional residential dwellings, flexible commercial and community floorspace, a not-for-profit café community use, children's playspace, public realm improvements, landscaping and other associated works. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

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

CONCLUSION

765. This application would bring into productive and optimised re-use this brownfield and underutilised site, providing a complementary mixture of PBCL, conventional housing, flexible commercial uses, employment/business floorspace and a not-for-profit community café. This would support the role and aspirations of the Old Kent Road Opportunity Area and is in line with the vision for the site, as set out in the adopted site allocation (NSP70) and the draft site allocation (OKR16).
766. There is support in the London Plan and Southwark Plan for PBCL, which helps to release local housing stock and is counted towards the borough's housing delivery. The proposed PBCL accommodation is considered to be exemplary, meeting not only the Mayoral and borough-level policy requirements, but also the quality standards promoted in the Mayor's LPG.
767. This planning application proposes 40% affordable housing by habitable room, in a policy compliant split between social rent and intermediate tenures. The accommodation would be of a high quality with a range of home sizes offered, including a number of larger 3- and 4-bedroom family homes, all supported by high quality external amenity space and play space. The 120 proposed homes are a significant benefit of the planning application.
768. The design of the proposed development evolved as a result of officer scrutiny throughout the pre-application phase, with further refinement during the planning application stage. The proposed composition of four generously-spaced blocks rising from plinths, which diminish in height from north to south, is successful. The proposed mix of brick in reds and greys complemented by

light-coloured masonry, the variety in detailing, the defined 'crowns' and 'bases', and the incorporation of greenery, combine into an exemplary standard of architecture. The façade design is reflective of the buildings' significance as tall buildings in this Opportunity Area location, contributing positively to the local townscape. Through optimised active frontages and the delivery of a new public park at the heart of the site, the development would provide an engaging and animated building at street level. In summary, the proposed development would comply with all aspects of the tall building policy, while also making a public space contribution commensurate with the size of the site.

769. The impacts on neighbours' amenity have been assessed and, while it is recognised that for some properties the daylight and sunlight losses would exceed the BRE guidelines, they are similar in their extent and magnitude to the impacts caused by the previous/extant planning permission.
770. Transport and highways matters have been satisfactorily addressed by the application documents, with detailed arrangements and mitigation to be secured through planning conditions and obligations. Although the conventional housing and non-residential uses would provide long- and short-stay cycle parking in compliance with the London Plan and Southwark Plan requirements, the PBCL would not deliver the policy minimum of 605 stands. However, it is considered that the proposed on-site provision of a free-of-charge Cycle Share Scheme, along with Travel Plan commitments, makes for acceptable mitigation in this instance.
771. Through optimised greening at ground, podium and rooftops levels, including the provision of 25 new trees, the scheme would achieve a UGF of 0.40. It would also make an off-site contribution towards Biodiversity Net Gain.
772. In terms of energy and sustainability, the proposals perform well, achieving cumulative carbon savings of 74% against the Part L 2021 baseline, and meeting the Mayor's aspirational Whole Life Cycle benchmarks. Subject to compliance with the detailed energy and sustainability strategies submitted with the planning application and payment of the Carbon Green Fund, the development satisfactorily addresses climate change policies.
773. In line with the requirements of the NPPF, the Council has applied the presumption in favour of sustainable development. The proposal would accord with sustainable principles and would make efficient use of a prominent vacant brownfield site to deliver a high quality development that is in accordance with the Council's aspirations for the area. It is therefore recommended that planning permission is granted, subject to conditions as set out in the attached draft decision notice, referral to the GLA, and the timely completion of a Section 106 Agreement.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: 2327-79 Application file: 23/AP/0387 Southwark Local Development Framework and Development Plan Documents	Environment, Neighbourhoods and Growth Department 160 Tooley Street, London, SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer email: patrick.cronin@southwark.gov.uk 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
Appendix 6	Community Review Panel

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth	
Report Author	Patrick Cronin, Team Leader	
Version	Final	
Dated	25 October 2023	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance	No	No
Strategic Director of Environment, Neighbourhoods and Growth	No	No
Strategic Director of Housing	No	No
Date final report sent to Constitutional Team		26 October 2023

Town and Country Planning Act 1990 (as amended)

www.southwark.gov.uk

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

RECOMMENDATION (DRAFT DECISION NOTICE)

LBS Reg. No.: 23/AP/0387

Date of Issue of Decision: N/A

Applicant Wittington Investments (Properties) Ltd

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

Redevelopment of the site to provide two separate buildings comprising large scale purpose built shared living units, conventional residential dwellings, flexible commercial floorspace, a not-for-profit café community use, children's playspace, public realm improvements, landscaping and other associated works.

At: 79-161 Ilderton Road London Southwark SE16 3JZ

In accordance with the valid application received on 23 February 2023 and supporting documents submitted which can be viewed on our Planning Register.

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

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

Conditions

Permission is subject to the following Approved Plans Condition:

1. The development shall be carried out in accordance with plans and documents submitted with the planning application.

Permission is subject to the following Time Limit and Scope of Works Condition:**2. TIME LIMIT AND SCOPE OF WORKS**

Permission is hereby granted for two separate buildings, one of 27 storeys plus additional rooftop plant (90.53 metres above ground level, 91.73 metres above Ordnance Datum) and the other of 15 storeys plus additional rooftop plant (53.88 metres above ground level, 55.08 metres above Ordnance Datum), with each building containing a single storey basement and in their totality comprising:

- 605 Large-scale Purpose-built Shared Living units;
- 120 affordable conventional residential dwellings;
- 823 square metres GIA of flexible commercial/employment floorspace (Class E), of which a portion would be affordable;
- 123 square metres GIA of not-for-profit café community use (Class E/F);
- children's playspace and public realm improvements; and
- other associated works incidental to the development.

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

REASON:

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

Permission is subject to the following Pre-Commencement Conditions:**3. TREE PLANTING WORKS**

Prior to the commencement of any development hereby consented (including any works of demolition, soft strip and site clearance), full details of all proposed tree planting shall be submitted to and approved in writing by the Local Planning Authority, to include:

- tree pit cross sections;
- planting and maintenance specifications;
- use of guards or other protective measures; and
- confirmation of location, species, sizes, nursery stock type, supplier and defect period.

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 'Recommendations for Cultivation and Planting of Trees in Advanced Nursery Stock Category' and BS 4428 'Code of Practice for General Landscaping Operations'.

If within a period of five years from the date of the planting of any tree that

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

REASON:

To ensure the proposed development will preserve and enhance the visual amenities of the locality and is designed for the maximum benefit of local biodiversity, in addition to the attenuation of surface water runoff, in accordance with: the National Planning Policy Framework 2023; 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 2012; and Policies P13 (Design of places), P14 (Design quality), P56 (Protection of Amenity) and P60 (Biodiversity) of the Southwark Plan 2022.

4. SITE CONTAMINATION

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

- a site walkover survey;
- identification of contaminants of the land and controlled waters;
- a conceptual model of the site; and
- a conclusion and recommendations as to whether a Phase 2 intrusive investigation is required;

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

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

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

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

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

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

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

e) In the event that potential contamination is found at any time when carrying out the approved development that was not previously identified, it shall be reported in writing immediately to the Local Planning Authority, and a 'Scheme of Investigation and Risk Assessment', a 'Remediation and/or Mitigation Strategy' and (if required) a 'Verification Report' shall be submitted to the Local Planning Authority for approval in writing, in accordance with a-d above.

REASON:

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors, in accordance with: the National Planning Policy Framework 2023; and Policy P64 (Contaminated Land and Hazardous Substances) of the Southwark Plan 2022.

5. CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

Prior to the commencement of any development hereby consented (including any works of demolition, soft strip and site clearance), a written Construction Environmental Management Plan (CEMP) shall be 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 including boundary limits and respite periods where exceedance of boundary limits is unavoidable;
- site perimeter continuous automated noise, dust and vibration monitoring and arrangements for provision of access to live data feeds to the Local Planning Authority;
- engineering measures to eliminate or mitigate identified environmental impacts (hoarding height and density, acoustic screening, sound insulation, dust control measures, emission reduction measures, location of specific activities on site, etc.);
- arrangements for a direct and responsive site management contact for nearby occupiers during demolition and/or construction (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 higher standard as stipulated by the Mayor of London for Opportunity Areas .

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

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

REASON:

To ensure that occupiers of neighbouring premises and the wider environment do not suffer a loss of amenity by reason of pollution and nuisance, in accordance with: the National Planning Policy Framework 2023; Policies GG3 (Creating a Healthy City), D14 (Noise) and T7 (Deliveries, Servicing and Construction) of the London Plan 2021; and Policies P45 (Healthy Developments), P50 (Highways Impacts), P56 (Protection of Amenity); P62 (Reducing Waste), P65 (improving Air Quality), P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

6. CONSTRUCTION LOGISTICS PLAN

Prior to the commencement of any development hereby consented

(including any works of demolition, soft strip and site clearance), a Construction Logistics Plan developed in liaison with Transport for London to manage all freight vehicle movements to and from the site shall be submitted to and approved by the Local Planning Authority.

The Construction Logistics Plan shall:

- identify all efficiency and sustainability measures that will be taken during the main construction works phase of the development;
- make firm commitments to smart procurement and collaboration (e.g. sharing suppliers) to minimise the number of construction vehicle trips; and
- demonstrate how deliveries to the development through sustainable modes of transport, such as smaller electric vehicles and cargo, will be maximised.

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

REASON:

To ensure that construction works do not have an adverse impact on the transport network and to minimise the impact of construction activities on local air quality, in accordance with: the National Planning Policy Framework 2023; Policies GG3 (Creating a Healthy City), D14 (Noise), T6 (Assessing and Mitigating Transport Impacts) and T7 (Deliveries, Servicing and Construction) of the London Plan 2021; and Policies P45 (Healthy Developments), P50 (Highways Impacts), P65 (Improving Air Quality) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

7. ARCHAEOLOGICAL EVALUATION

Prior to the commencement of any development hereby consented (with the exception of demolition to slab level and site investigation works), a Programme of Archaeological Evaluation Works shall be secured 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 necessary archaeological information is supplied, in the interests of ensuring suitable mitigation measures and/or foundation design proposals are presented, in accordance with: the National Planning Policy Framework 2023; and Policy P23 (Archaeology) of the Southwark Plan 2022.

8. ARCHAEOLOGICAL FOUNDATION AND BASEMENT DESIGN

Prior to the commencement of any development hereby consented (with the exception of demolition to slab level, archaeological evaluation and site investigation works), a detailed scheme showing the complete scope and arrangement of the basement and foundation design, and all associated subterranean groundworks, including the construction methods, shall be

submitted to and approved in writing by the Local Planning Authority. The submitted document(s) shall demonstrate that archaeological remains will be protected by a suitable mitigation strategy. The development shall only be carried out in accordance with the approval given.

REASON:

In order that details of the basement, foundations and all below ground impacts of the proposed development are known and an appropriate protection and mitigation strategy is achieved to preserve archaeological remains by record and/or in situ, in accordance with: the National Planning Policy Framework 2023; and Policy P23 (Archaeology) of the Southwark Plan 2022.

9. ARCHAEOLOGICAL MITIGATION

Prior to the commencement of any development hereby consented (with the exception of demolition to slab level, archaeological evaluation and site investigation works), the implementation of a Programme of Archaeological Mitigation Works shall be secured in accordance with a Written Scheme of Investigation, which shall be submitted to and approved in writing by the Local Planning Authority.

REASON:

In order that the details of the programme of works for the archaeological mitigation are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site, in accordance with: the National Planning Policy Framework 2023; and Policy P23 (Archaeology) of the Southwark Plan 2022.

10. DIGITAL CONNECTIVITY INFRASTRUCTURE STRATEGY

Prior to the commencement of any development hereby consented (with the exception of demolition to slab level, archaeological evaluation, site investigation works 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 the development. The development shall be carried out in accordance with the approved plans and maintained as such in perpetuity.

REASON:

To provide high quality digital connectivity infrastructure to contribute to London's global competitiveness, in accordance with: the National Planning Policy Framework 2023; Policy SI 6 (Digital Connectivity Infrastructure) of the London Plan 2021; and Policy P44 (Broadband and Digital Infrastructure) of the Southwark Plan 2022.

11. FINAL GROUND PLANE SPOT LEVELS PLAN

Prior to the commencement of any development hereby consented (with the

exception of demolition to slab level, archaeological evaluation, site investigation works and site clearance), a detailed Final Ground Plane Spot Levels Plan shall be submitted to and approved in writing by the Local Planning Authority showing:

- the proposed finished floor levels in each of the ground floor rooms within the proposed development, including any stepped or raised areas;
- the gradients and falls of any sloped or ramped parts of the ground floor rooms within the proposed development;
- regular proposed spot levels across all external areas of the site, adjacent footway and adjacent highways; and
- level access thresholds (wherever feasible) from external areas into the interior spaces.

REASON:

To ensure a high quality and accessible public realm that relates to the internal ground floor environment and adjacent highway/footway network in a safe and rational way, in accordance with: the National Planning Policy Framework 2023; Policies Policy D4 (Delivering Good Design) and D5 (Inclusive Design), D8 (Public Realm) and T2 (Healthy Streets) of the London Plan 2021; and Policies P13 (Design of Places), P14 (Design Quality), P50 (Highways impacts), P51 (Walking), P53 (Cycling) of the Southwark Plan 2022.

12. PILING METHOD STATEMENT

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

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

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

REASON:

In the interests of protecting key water supply assets having regard to the close proximity of the proposed development to, and thus its potential impact on, underground water utility infrastructure, in accordance with: the National Planning Policy Framework 2023; and Policy SI5 (Water Infrastructure) of the London Plan 2021.

Permission is subject to the following Above Grade Works Conditions:

13. SIGNAGE STRATEGY

Before any above grade work hereby consented begins (with the exception of demolition), a Signage Strategy detailing the design code(s) for the proposed frontages of the flexible commercial units, business/employment units and community café unit shall be submitted to and approved in writing by the Local Planning Authority. Thereafter, all installed signage (including any new/replacement signage) shall be implemented in accordance with the approved Signage Strategy.

The design code(s) shall include details of:

- dimensions and locations of the advertisement zones;
- materials;
- awnings;
- mode and level of any illumination; and
- any ways in which the proposed signage designs differ from those in the planning application stage drawings.

REASON:

To ensure that high quality, consistent and coordinated signage is installed across all non-residential frontages within the development hereby approved, in accordance with: the National Planning Policy Framework 2023; Policies D4 (Delivering Good Design), D8 (Public Realm) and D9 (Tall Buildings of the London Plan 2021; and Policies P14 (Design Quality) and P43 (Outdoor Advertisements and Signage) of the Southwark Plan 2022.

14. HARD AND SOFT LANDSCAPING

Before any above grade work hereby consented begins (with the exception of demolition), detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings (including cross sections, surfacing materials of access, pavements and edgings and details of any planters and greening of plant enclosures), together with details of the green trellises including a strategy for their continued maintenance and irrigation, shall be submitted to and approved in writing by the Local Planning Authority.

The planting shall be carried out in the first planting season following completion of building works and any trees or shrubs that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the same size and species in the first suitable planting season. Planting shall comply to:

- 'BS: 4428 Code of practice for general landscaping operations';
 - 'BS: 5837 (2012) Trees in relation to demolition, design and construction';
- and
- 'BS 7370-4:1993 Grounds maintenance: Recommendations for maintenance of soft landscape (other than amenity turf)'.

Prior to first occupation of any part of the development hereby approved, the green trellises shall be installed strictly in accordance with the approved

details and shall be maintained in accordance with the approved details thereafter.

REASON:

To ensure that the details of the landscaping scheme are satisfactory, and to ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2023; Policies SI 4 (Managing Heat Risk), SI 13 (Sustainable Drainage), G1 (Green Infrastructure), G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021; and Policies P13 (Design of Places), P14 (Design Quality), P56 (Protection of Amenity), P57 (Open Space), P59 (Green Infrastructure) and P60 (Biodiversity) of the Southwark Plan 2022.

15. ECOLOGICAL MANAGEMENT PLAN

Before any above grade work hereby consented begins (with the exception of demolition), an Ecological Management Plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas, shall be submitted to and approved in writing by the Local Planning Authority.

Thereafter, and for the lifetime of the development, the landscaped areas shall be retained, managed and maintained as set out within the approved Ecological Management Plan.

REASON:

To ensure the protection of wildlife and habitats, and to secure opportunities for the enhancement of the nature conservation value of the site, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2023; Policies G1 (Green Infrastructure), G5 (Urban Greening), G6 (Biodiversity and Access to Nature) and G7 (Trees and Woodlands) of the London Plan 2021; and Policies SP6 (Climate Emergency), P59 (Green Infrastructure) and P60 (Biodiversity) of the Southwark Plan 2022.

16. BIODIVERSITY ROOFS

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

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

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

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

REASON:

To ensure the development provides the maximum possible provision towards greening, in turn helping to create and foster habitats and valuable areas for biodiversity, in accordance with: the National Planning Policy Framework 2023; Policies G1 (Green Infrastructure), G5 (Urban Greening) and G6 (Biodiversity and Access to Nature) of the London Plan 2021; and Policy P60 (Biodiversity) of the Southwark Plan 2022.

17. METHOD STATEMENT FOR CONTROL OF JAPANESE KNOTWEED

Before any above grade work hereby consented begins (with the exception of demolition), a detailed Method Statement for the removal or long-term management /eradication of Japanese Knotweed on the site shall be submitted to and approved in writing by the Local Planning Authority. The Method Statement shall include:

- measures to prevent the spread of Japanese Knotweed during any operations such as mowing, strimming or soil movement; and
- measures to ensure that any soils brought to the site are free of the seeds, root and/or stem (whichever the case may be) of any invasive plant covered under the Wildlife and Countryside Act 1981.

Development shall proceed in accordance with the approved Method Statement.

REASON:

Japanese Knotweed is an invasive plant whose spread is prohibited under the Wildlife and Countryside Act 1981, and thus without measures to prevent its spread as a result of the development there would be the risk of an offence being committed and avoidable harm to the environment occurring, in accordance with: the National Planning Policy Framework 2023; Policies G1 (Green Infrastructure), G5 (Urban Greening), G6 (Biodiversity and Access to Nature) and G7 (Trees and Woodlands) of the London Plan 2021; and Policies P56 (Protection of Amenity), P59 (Green Infrastructure) and P60 (Biodiversity) of the Southwark Plan 2022.

18. INVERTEBRATE HABITATS

- a) Before any above grade work hereby consented begins (with the exception of demolition), details of no fewer than 6 bee bricks and/or invertebrate hotels shall be submitted to and approved in writing by the Local Planning Authority. The details shall include the exact location, specification and design of the habitats.

Prior to the first occupation of the building to which they form part, the habitat features shall be installed strictly in accordance with the approved details. Once completed and for the lifetime of the development, all the habitats shall be maintained in accordance with the approved details.

b) No later than six weeks subsequent to first occupation of the building to which the habitat features form part or the first use of the space in which they are contained, a post completion assessment (details/evidence of the installed habitat features and mapped locations) shall be submitted to the Local Planning Authority, and this condition shall not have been discharged until written approval has been given by the Local Planning Authority.

The approved habitat features shall from first installation and for the lifetime of the development be maintained in accordance with the approved details.

REASON:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity, in accordance with: the National Planning Policy Framework 2023; Policy G6 (Biodiversity and Access to Nature) of the London Plan 2021; and Policies P59 (Green Infrastructure) and P60 (Biodiversity) of the Southwark Plan 2022.

19. BAT ROOSTING FEATURES

a) Before any above grade work hereby consented begins (with the exception of demolition), details of no fewer than six bat bricks/tubes shall be submitted to and approved in writing by the Local Planning Authority. The details shall include the exact location (all bricks/tube should be oriented to face east, towards the adjacent Site of Importance for Nature Conservation), specification and design of the habitats.

Prior to the first occupation of the building to which they form part, the bricks/tubes shall be installed strictly in accordance with the approved details. Once completed and for the lifetime of the development, all the bricks/tubes shall be maintained in accordance with the approved details.

b) No later than six weeks subsequent to the installation of the bricks/tubes approved under part a) of this condition, a post completion assessment shall be submitted to the Local Planning Authority confirming the bricks/tubes have been installed to the agreed specification, and this condition shall not have been discharged until written approval has been given by the Local Planning Authority.

REASON:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with: the National Planning Policy Framework 2023; Policies G1 (Green Infrastructure), G5 (Urban Greening) and G6 (Biodiversity and Access to Nature) of the London Plan 2021; and Policies P59 (Green Infrastructure) and P60 (Biodiversity) of the Southwark Plan 2022.

20. SWIFT NESTING FEATURES

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

Prior to the first occupation of the building, the nesting bricks shall be installed strictly in accordance with the approved details. Once completed and for the lifetime of the development, all the nesting bricks shall be maintained in accordance with the approved details.

b) Within six weeks of installation of the nesting bricks approved under part a) of this condition, a post completion assessment shall be submitted to the Local Planning Authority confirming the features have been installed to the agreed specification, and this condition shall not have been discharged until written approval has been given by the Local Planning Authority.

REASON:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with: the National Planning Policy Framework 2023; Policy G6 (Biodiversity and Access to Nature) of the London Plan 2021; and Policy P60 (Biodiversity) and P69 (Sustainable Standards) of the Southwark Plan 2022.

21. SECTION DETAIL-DRAWINGS

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

- i. Facades (reveals etc.) including:
 - The various brick treatments;
 - Canopies/awnings;
 - Junctions of exposed structural elements (columns, beams and floors);
 - Head, cills and jambs of openings;
 - Parapets and roof edges;
 - Rooftop balustrades;
- ii. Entrances (including any access sashes, security gates, entrance portals and awnings);
- iii. Typical windows;
- iv. Plant screening/ enclosure;
- v. Shopfront of the retail/service/dining units and the Large-scale Purpose-built Shared Living foyer;
- vi. Signage zones; and
- vii. Gates and fencing to all external spaces;

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

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

REASON:

In order to satisfy the Local Planning Authority that the construction details will achieve a high quality of design and detailing, are suitable in context and are consistent with the consented scheme, in accordance with: the National Planning Policy Framework 2023; Policy D4 (Delivering Good Design) of the London Plan 2021; and Policies P13 (Design of Places) and P14 (Design Quality) of the Southwark Plan 2022.

22. MATERIALS SCHEDULE AND ON-SITE PRESENTATION OF MOCK-UP PANELS

Before any above grade work hereby consented begins (with the exception of demolition):

- a) the specification of each facing materials to be used in the development hereby approved shall be submitted as part of a Material Schedule to, and thereafter approved in writing by, the Local Planning Authority; and
- b) full-scale mock-ups of the facades shall be presented on site (or near to the site) and approved in writing by the Local Planning Authority (the detailed scope of mock up requirements to have been agreed with the Local Planning Authority in advance of them being constructed and presented on site).

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

REASON:

In order that the Local Planning Authority may be satisfied that these samples will make an acceptable contextual response in material terms, will achieve a high quality of design and detailing, and are consistent with the consented scheme, in accordance with: the National Planning Policy Framework 2023; Policy D4 (Delivering Good Design) of the London Plan 2021; and Policies P13 (Design of Places) and P14 (Design Quality) of the Southwark Plan 2022.

23. SECURED BY DESIGN

a) Before any above grade work hereby consented begins (with the exception of demolition), details of security measures (specified to achieve the 'Secured by Design' accreditation award from the Metropolitan Police) shall be submitted to 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.

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

REASON:

In pursuance of the Local Planning Authority's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention, in accordance with: the National Planning Policy Framework 2023; Policy D11 (Safety, Security and Resilience to Emergency) of the London Plan 2021; and Policy P16 (Designing Out Crime) of the Southwark Plan 2022

24. SPRINKLER SYSTEM

Before any above grade work hereby consented begins (with the exception of demolition), full particulars of the sprinkler system to be used within the commercial units shall be submitted to and approved by the Local Planning Authority. The development shall not be carried out other than in accordance with any approval given.

REASON:

To ensure that there is an adequate level of fire safety within this mixed use development, in accordance with: the National Planning Policy Framework 2023; and Policies D11 (Safety, Security and Resilience to Emergency) and D12 (Fire Safety) of the London Plan 2021.

25. RESISTANCE TO VERTICAL SOUND TRANSMISSION BETWEEN COMMERCIAL AND RESIDENTIAL USES

a) Before any above grade work hereby authorised begins (with the exception of demolition), an Acoustic Predictions and Mitigation Measures Report shall be submitted to and approved in writing by the Local Planning Authority. This report shall demonstrate that the development has been designed and will be constructed to ensure all habitable rooms (Purpose-Built Shared Living Units and conventional Class C3 dwellings) sharing a party ceiling/floor element with commercial premises shall 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.

b) The development shall be carried out in accordance with the approved Acoustic Predictions and Mitigation Measures Report.

c) Following completion of the development and prior to first occupation of any part, a Validation Test shall be carried out on a relevant sample of premises, and the Validation Test shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be permanently maintained as such 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

National Planning Policy Framework 2023; and Policies P56 (Protection of Amenity) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

26. RESISTANCE TO ENTERTAINMENT NOISE LEVELS

a) Before any above grade work hereby authorised begins (with the exception of demolition), an Acoustic Predictions and Mitigation Measures Report shall be submitted to and approved in writing by the Local Planning Authority. This report shall demonstrate that the development has been designed to ensure that habitable rooms (Purpose-Built Shared Living Units and conventional Class C3 dwellings) are not exposed to entertainment noise in excess of 27dB LAeq across any 5 minute period

b) The development shall be carried out in accordance with the approved Acoustic Predictions and Mitigation Measures Report.

c) Following completion of the development and prior to first occupation of any part, a Validation Test shall be carried out on a relevant sample of premises, and the Validation Test shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be permanently maintained as such thereafter.

REASON:

To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with: the National Planning Policy Framework 2023; and Policies P56 (Protection of Amenity) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

Permission is subject to the following Pre-Occupation Conditions:

27. FINAL EXTERNAL LIGHTING STRATEGY

Before the first occupation of any part of the development hereby consented, a Final External Lighting Strategy providing details of all external lighting (including design, power and position of luminaries, and any dim-down and turn-off times) shall be submitted to and approved in writing by the Local Planning Authority. The Strategy shall

- (i) demonstrate compliance with the details given at 5.2.12 of the Preliminary Ecological Appraisal submitted with the planning application;
- (ii) demonstrate compliance with the Institute of Lighting Professionals Guidance Note 01/20 'Guidance notes for the reduction of obtrusive light'; and
- (iii) confirm that the recommended lighting specification would:
 - use LED's at 3 lux;
 - achieve the recommended spectrum of 80% amber and 20% white with a

clear view and no UV;

- achieve horizontal light spread ideally less than 70 degrees; and
- include a timer.

REASON:

To ensure compliance with the Habitats Regulations and the Wildlife & Countryside Act 1981 (as amended), and in order that the Local Planning Authority may be satisfied as to the details of the development in the interest of the visual amenity of the area, the safety and security of persons using the area and the amenity and privacy of adjoining occupiers in accordance with: the National Planning Policy Framework 2023; Policies D3 (Optimising Site Capacity Through the Design-led Approach), D4 (Delivering Good Design), D8 (Public Realm), D9 (Tall Buildings), D14 (Designing Out Crime), D11 (Safety, Security and Resilience to Emergency), G1 (Green Infrastructure) and G6 (Biodiversity and Access to Nature) of the London Plan 2021; and Policies P13 (Design of Places), P16 (Designing Out Crime), P56 (Protection of Amenity), P59 (Green Infrastructure) and P60 (Biodiversity) of the Southwark Plan 2022.

28. FINAL SECURITY SURVEILLANCE EQUIPMENT STRATEGY

Before the first occupation of any part of the development hereby consented, a Final Security Surveillance Equipment Strategy shall be submitted to and approved in writing by the Local Planning Authority. The Strategy shall provide details of the security surveillance equipment to be installed on the building and within all external areas at all levels of the building.

REASON:

In order that the Local Planning Authority may be satisfied as to the details of the development in the interest of the visual amenity of the area, the safety and security of persons using the area and the amenity and privacy of adjoining occupiers in accordance with: the National Planning Policy Framework 2023; Policies D3 (Optimising Site Capacity Through the Design-led Approach), D4 (Delivering Good Design), D8 (Public Realm), D9 (Tall Buildings), D14 (Designing Out Crime) and D11 (Safety, Security and Resilience to Emergency) of the London Plan 2021; and Policies P13 (Design of Places), P56 (Protection of Amenity) and P16 (Designing Out Crime) of the Southwark Plan 2022.

29. BIODIVERSITY MITIGATION AND ENHANCEMENT MONITORING SCHEME

- a) Before the first occupation of any part of the development hereby consented, a 'Biodiversity Mitigation and Enhancement Monitoring Scheme' shall be submitted to and approved by the Local Planning Authority. The Scheme shall include (but not necessarily be limited to):
- annual protected species surveys of created, retained or receptor habitats;
 - botanical/bird/invertebrate surveys of created or retained habitats; and
 - use of bird or bat boxes.

b) Following approval of the Scheme referred to in part a) of this condition, and following first occupation of the development, the monitoring shall be carried out and reported to the Local Planning Authority in accordance with the agreed scheme for a period of 30 years. Surveys shall be undertaken in years 1, 3, 5, 7, 10, 15, 20, 25 and 30, and the evidence submitted to the Council for discharge in those nine stages.

Species results will be submitted to the London Biological Records Centre, Greenspace Information for Greater London (GIGL).

REASON:

In order to: comply with the Biodiversity Net Gain requirements of the Environment Act 2021, measure the effectiveness of biodiversity mitigation and/or enhancement measures, ascertain whether the measures achieve the expected biodiversity benefits, and assist with biodiversity monitoring in the interests of helping to inform and refine the design of net gain/mitigation schemes to ensure effective measures are delivered in future developments, all in accordance with: the National Planning Policy Framework 2023; Policies G1 (Green Infrastructure), G5 (Urban Greening) and G6 (Biodiversity and Access to Nature) of the London Plan 2021; and Policies SP6 (Climate Emergency), P59 (Green Infrastructure) and P60 (Biodiversity) of the Southwark Plan 2022.

30. ELECTRIC VEHICLE CHARGING POINTS

Before the first occupation of any part of the development hereby consented, details of the installation (including location and type) of the two electric vehicle charger points to serve the wheelchair parking spaces shall be submitted to and approved in writing by the Local Planning Authority.

The approved electric vehicle charger point shall be installed prior to occupation of any part of the development, and shall not be carried out other than in accordance with the approval given.

REASON:

To encourage more sustainable travel and minimise the effect of the development on local air quality within the designated Air Quality Management Area, as well as to encourage the uptake of electric and hybrid vehicles, in accordance with: the National Planning Policy Framework 2023; Policy T6 (Car Parking) of the London Plan 2021; and Policies P54 (Car Parking) and P70 (Energy) of the Southwark Plan 2022.

31. BREEAM CERTIFICATION

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

and construction to be reasonably well assured that the commercial elements of the development hereby approved will, once completed, achieve the agreed 'Excellent' BREEAM Standards.

b) Within six months of first occupation of the development hereby permitted, a certified Post Construction Review (or other verification process agreed with the Local Planning Authority) shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed 'Excellent' BREEAM standards have been met.

REASON:

To ensure the proposal achieves high environmental standards and plays its role in reducing the extent of man-made climate change, in accordance with: the National Planning Policy Framework 2023; Policy SI2 (Minimising Greenhouse Gas Emissions) of the London Plan 2021; and Policies SP6 (Climate Emergency) and P69 (Sustainability Standards) of the Southwark Plan 2022.

32. OFF-SITE WATER INFRASTRUCTURE NETWORK CAPACITY UPGRADES

Before the first occupation of any part of the development hereby consented, evidence to confirm that either:

- a) all water network upgrades required to accommodate the additional flows to serve the development have been completed; or
- b) a Development and Infrastructure Phasing Plan has been agreed with Thames Water to enable the development to be occupied; shall be submitted to and approved in writing by the Local Planning Authority (in liaison with Thames Water).

Where a Development and Infrastructure Phasing Plan is required, occupation of the development shall not take place other than in accordance with the agreed Development and Infrastructure Phasing Plan.

REASON:

Additional demand will arise from the development hereby consented, which may result in low or no water pressures, and as such the provision of reinforcement works are anticipated to ensure there is sufficient capacity within the off-site water infrastructure network, in accordance with: the National Planning Policy Framework 2023; Policy SI5 (Water Infrastructure) of the London Plan 2021; and Policy P67 (Reducing Water Use) of the Southwark Plan 2022.

33. EXTRACTION AND VENTILATION SCHEME FOR COMMERCIAL KITCHEN (CLASS E) USES

Before commencement of any commercial (Class E) unit involving the cooking of food, full particulars and details of a scheme for the extraction and ventilation of any commercial kitchen use shall be submitted to and approved by the Local Planning Authority, demonstrating that that fumes

and odours from the kitchen would not affect public health or residential amenity. The scheme shall include:

- details of extraction rate and efflux velocity of extracted air;
- full details of grease, particle and odour abatement plant;
- the location and orientation of the extraction ductwork and discharge terminal; and
- a Management and Servicing Plan for maintenance of the extraction system.

Once approved, the scheme shall be implemented in full and permanently maintained thereafter.

REASON:

In order to ensure that that any installed ventilation, ducting and/or ancillary equipment 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 2023; Policies D4 (Delivering Good Design), D13 (Agent of Change) and SI 1 (Improving Air Quality) of the London Plan 2021; and Policies P13 (Design of Places), P14 (Design Quality), P56 (Protection of Amenity) and P65 (Improving Air Quality) of the Southwark Plan 2022.

Permission is subject to the following Compliance Conditions:

34. INTERNAL NOISE LEVEL REQUIREMENTS FOR THE RESIDENTIAL UNITS

The residential units (Purpose-Built Shared Living Units and conventional Class C3 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: 35 dB LAeq T #

[* refers to night time - 8 hours between 23:00-07:00; # refers to day time - 16 hours between 07:00-23:00]

When assessing mitigation measures to ensure the above standards are met, the tenth highest individual LAMax event measured shall be used not a time-averaged LAMax.

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: the National Planning Policy Framework 2023; Policy D14 (Noise) of the London Plan 2022; and Policies P56 (Protection of Amenity) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

35. RESISTANCE TO HORIZONTAL SOUND TRANSMISSION BETWEEN

RESIDENTIAL UNITS

The habitable rooms within the development (Purpose-Built Shared Living Units and conventional Class C3 dwellings) sharing a party wall element with any other residential or commercial premises shall be designed and constructed to provide reasonable resistance to the transmission of sound sufficient to ensure that the party wall meets a minimum of 5dB improvement on the Building Regulations standard set out in Approved Document E.

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 National Planning Policy Framework 2023; Policy D14 (Noise) of the London Plan 2022; and Policies P56 (Protection of Amenity) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

36. PLANT NOISE

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

REASON:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance, and that the local environment does not suffer from noise creep due to plant and machinery, in accordance with: the National Planning Policy Framework 2023; Policy D14 (Noise) of the London Plan 2022; and Policies P56 (Protection of Amenity) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

37. LIMITATION ON EXTERNAL NOISE LEVELS IN PRIVATE AND COMMUNAL EXTERNAL AMENITY AREAS

Private and communal external amenity areas shall be designed to attain 50dB(A) LAeq, 16hr * measured at head height, when seated.
[* refers to daytime - 16 hours between 07:00-23:00hrs]

REASON:

To ensure that the users of the proposed development do not suffer a loss of amenity by reason of excess environmental noise in accordance with: the National Planning Policy Framework 2023; Policy D14 (Noise) of the London Plan 2022; and Policies P56 (Protection of Amenity) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

38. CYCLE STORAGE COMPLIANCE

The development hereby approved shall not be carried out other than in accordance with the cycle parking facilities (spaces, stand types, layout and access arrangements) shown on the following approved documents:

- Ground floor General Arrangement Plan - Ref C_0_100 - Rev P29 - Dated 23.10.2023 - Produced by TP Bennett
- Basement General Arrangement Plan - C_0_099 - Rev P11 - Dated 23.10.2023 - Produced by TP Bennett

REASON:

To ensure that satisfactory safe and secure cycle parking facilities are provided and retained in order to encourage the use of cycling as an alternative means of transport to the development and to reduce reliance on the use of the private car in accordance with: the National Planning Policy Framework 2023; Policy T5 (Cycling) of the London Plan 2021; and P53 (Cycling) of the Southwark Plan 2022.

39. REFUSE STORAGE COMPLIANCE

The development hereby approved shall not be carried out other than in accordance with the refuse storage facilities (store rooms, layout and access arrangements) shown on the following approved documents:

- Ground floor General Arrangement Plan - Ref C_0_100 - Rev P29 - Dated 23.10.2023 - Produced by TP Bennett
- Basement General Arrangement Plan - C_0_099 - Rev P11 - Dated 23.10.2023 - Produced by TP Bennett

REASON:

To ensure that satisfactory safe and secure cycle parking facilities are provided and retained in order to encourage the use of cycling as an alternative means of transport to the development and to reduce reliance on the use of the private car in accordance with: the National Planning Policy Framework 2023; Policy T5 (Cycling) of the London Plan 2021; and P53 (Cycling) of the Southwark Plan 2022.

40. SERVICING HOURS

Notwithstanding the details contained in any delivery and servicing plans or documents approved as part of any condition attached to this decision notice, all deliveries or collections to the development hereby approved shall only be between the following hours:

- 06:00 to 22:00 Monday to Saturday; and
- 10:00 to 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 2023; Policy T7 (Deliveries, Servicing and Construction) of the London Plan 2021; and Policy P50 (Highways Impacts) of the Southwark Plan 2022.

41. CAR FREE MARKETING

The materials/details used to market all of the for sale and rental properties hereby consented shall clearly identify the development as car free (excluding the permitted designated blue badge spaces).

REASON:

To encourage more sustainable travel and minimise the effect of the development on local air quality within the designated Air Quality Management Area, in accordance with: the National Planning Policy Framework 2023; Policy T6 (Car Parking) of the London Plan 2021; and Policies P54 (Car Parking) and P70 (Energy) of the Southwark Plan 2022.

42. COMMERCIAL KITCHEN EXTRACT VENTILATION MAINTENANCE

All components of the extraction system shall be cleaned, serviced, maintained and replaced at sufficient intervals to prevent degradation in performance of the system's components affecting surrounding amenity, and fully in accordance with manufacturer's recommendations. Suitable documentary evidence shall be kept and made available to the Local Planning Authority upon request.

REASON:

To ensure that that any installed kitchen extraction system will not cause a loss of amenity by reason of odour or fume, in accordance with: The National Planning Policy Framework 2023; Policies D13 (Agent of Change) and SI 1 (Improving Air Quality) of the London Plan 2021; and Policies P56 (Protection of Amenity) and P65 (Improving Air Quality) of the Southwark Plan 2022.

43. RESTRICTION: NO INSTATEMENT OF APPURTENANCES

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

REASON:

To ensure such works do not detract from the appearance of the buildings in accordance with: the National Planning Policy Framework 2023; Policy D4 (Delivering Good Design) of the London Plan 2023; and Policies P13 (Design of Places), P14 (Design Quality) and P56 (Protection of Amenity) of the Southwark Plan 2022.

44. RESTRICTION: NO INSTATEMENT OF ROOF PLANT AND OTHER ROOF STRUCTURES

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

REASON:

To ensure 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 2023; Policy D4 (Delivering Good Design) of the London Plan 2021; and Policies P13 (Design of Places), P14 (Design Quality) and P56 (Protection of Amenity) of the Southwark Plan 2022.

45. RESTRICTION: NO INSTATEMENT OF TELECOMMUNICATIONS EQUIPMENT

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

REASON:

To ensure no telecommunications plant or equipment which might be detrimental to the design and appearance of the building and visual amenity of the area is installed on the roof of the building in accordance with: the National Planning Policy Framework 2023; Policy D4 (Delivering Good Design) of the London Plan 2021; and Policies P13 (Design of Places), P14 (Design Quality) and P56 (Protection of Amenity) of the Southwark Plan 2022.

46. RESTRICTION: NO UNAUTHORISED PENETRATIVE GROUNDWORKS (BOREHOLES, PILING OR OTHER FOUNDATION DESIGNS)

Other than the piling specifically proposed and hereby approved, any 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. Any such express written consent shall be given only for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater.

Where soil contamination is present, any such application for piled or penetrative foundation designs shall be accompanied by a risk assessment carried out in accordance with the Environment Agency's guidance 'Piling into Contaminated Sites'. Piling activities will not be permitted on parts of a

site where an unacceptable risk is posed to Controlled Waters.

The development shall thereafter be carried out in accordance with the approved details.

REASON:

Due to the underlying groundwater risks attendant with piling or other penetrative methods of foundation design, and in order to protect receptors (workers, neighbours, other off-site receptors and future users of the development) from potential risks arising from any such foundation works in particular unacceptable levels of water pollution caused by mobilised contaminants, in accordance with: the National Planning Policy Framework 2023; Policy G9 (Geodiversity) of the London Plan 2021; and Policies P56 (Protection of Amenity) and P64 (Contaminated Land and Hazardous Substances) of the Southwark Plan 2022.

47. BASEMENT IMPACT ASSESSMENT COMPLIANCE

The development hereby approved shall be carried out in accordance with the recommendations and conclusions contained at Part 4 of the approved Basement Impact Assessment, which comprises the following document(s):

- Basement Impact Assessment - Ref 1635-EXP-S-RP-0020 - Rev 2 - Dated 30.01.2023 - Produced by Expedition Structural and Civil Engineering

REASON:

To ensure the basement is designed safely in reference to ground movement, flood risk, sustainable urban drainage and archaeology, in accordance with: the National Planning Policy Framework 2023; Policy D10 (Basement Development) of the London Plan 2021; Policies P14 (Design Quality), P23 (Archaeology) and P68 (Reducing Flood Risk).

48. FIRE SAFETY STRATEGY COMPLIANCE

The development hereby approved shall not be carried out other than in accordance with the approved Fire Safety Strategy, which comprises the following documents:

- 'London Plan Fire Statement - Ilderton Road' - Version 08 - Dated 12.06.2023 - Produced by BB7;
- 'Fire statement form' [Gateway One form] - Dated 11.10.2023 - Produced by BB7.

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 2023; and Policies D11 (Safety, Security and Resilience to Emergency) and D12 (Fire Safety) of the London Plan 2021.

49. ECOLOGICAL APPRAISAL COMPLIANCE

The development hereby approved shall not be carried out other than in accordance with the recommendations of the approved Preliminary Ecological Appraisal, which comprises the following document:

- 'Preliminary Ecological Appraisal' - Ref OXF9720 - Version A – Dated November 2022 – Produced by RPS

This shall include the sensitive habitat clearance of the site between the months of March and October (when reptiles and amphibians are active), in full accordance with the methodology given at Section 5 of the approved Preliminary Ecological Appraisal, with the process to be overseen by a suitably qualified ecologist.

REASON:

To ensure the protection of wildlife and habitats, and to secure opportunities for the enhancement of the nature conservation value of the site, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2023; Policies G1 (Green Infrastructure), G5 (Urban Greening), G6 (Biodiversity and Access to Nature) and G7 (Trees and Woodlands) of the London Plan 2021; and Policies SP6 (Climate Emergency), P59 (Green Infrastructure) and P60 (Biodiversity) of the Southwark Plan 2022.

Permission is subject to the following Special Conditions:

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, 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 a commitment to finance and resource these works to their completion.

REASON:

In order that the archaeological interest of the site is secured with regard to the details of the post-excavation works, publication and archiving to ensure the preservation of archaeological remains by record in accordance with: the National Planning Policy Framework 2023; and Policy P23 (Archaeology) of the Southwark Plan 2022.

51. POST-CONSTRUCTION WHOLE LIFE-CYCLE CARBON REPORTING

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

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

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

REASON:

To ensure whole life-cycle carbon is calculated and reduced, and to demonstrate compliance with: the National Planning Policy Framework 2023; and Policy SI 2 (Minimising Greenhouse Gas Emissions) of the London Plan 2021; and Policy P70 (Energy) of the Southwark Plan 2022.

52. POST-COMPLETION CIRCULAR ECONOMY REPORTING

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

a) a Post-Completion Circular Economy Report setting out the predicted and actual performance against all numerical targets in the Planning Stage Circular Economy Statement shall be submitted to the GLA at CircularEconomyLPG@london.gov.uk, along with any supporting evidence as per the GLA's Circular Economy Statements LPG; and

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

REASON:

To ensure the 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 2023; and Policies GG6 (Increasing Efficiency and Resilience) and SI7 (Reducing Waste and Supporting the Circular Economy) of the London Plan 2021; and Policy P62 (Reducing Waste) of the Southwark Plan 2022.

Informatives**1. INFORMATIVE FROM THAMES WATER REGARDING POTABLE WATER:
MINIMUM PRESSURE AND FLOW RATE**

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

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

Please read the Thames Water guide 'Working Near Our Assets' to ensure any works carried out will be in line with the necessary processes if working above or near Thames Water pipes or other structures. This can be accessed from: <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>

Should you require further information please contact Thames Water on: developer.services@thameswater.co.uk

Signed: *Stephen Platts*

Director of Planning and Growth

Important Notes Relating to the Council's Decision

1. Conditions

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

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

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

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

2. Community Infrastructure Levy (CIL) Information

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

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

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

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

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

3. National Planning Policy Framework

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

4. Appeals to the Secretary of State

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

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

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

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

5. Purchase Notice

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

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

6. Provisions for the Benefit of the Disabled

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

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

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

8. Works Affecting the Public Highway

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

9. The Dulwich Estate Scheme of Management

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

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

10. Building Regulations.

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

11. The Party Wall Etc. Act 1996.

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

12. Important

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

APPENDIX 2**Relevant planning policy**

Reference:	23/AP/0387
Proposal:	Redevelopment of the site to provide two separate buildings comprising large scale purpose built shared living units, conventional residential dwellings, flexible commercial and community floorspace, a not-for-profit café community use, children's playspace, public realm improvements, landscaping and other associated works.
Location:	79-161 Ilderton Road, London, Southwark SE16 3JZ

Adopted planning policyNational Planning Policy Framework (NPPF)

1. The revised National Planning Policy Framework ('NPPF'), updated in 2023, sets out the national planning policy and how this should be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental. At its heart is a presumption in favour of sustainable development.
2. Paragraph 218 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.
3. The relevant chapters of the NPPF are:
 - Chapter 2 - Achieving sustainable development
 - Chapter 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
 - Chapter 16 - Conserving and enhancing the historic environment

London Plan 2021

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

5. The strategic objectives of the London Plan 2021 are to build strong and inclusive communities, make the best use of land, promote a healthy city, optimise housing delivery including affordable housing, conserve and enhance London's global competitiveness, and move towards a more resilient and sustainable city. Development proposals must comply with the various policies within the Plan and should follow the guidance set out within Supplementary Planning Documents, Guidance and Strategies.
6. The relevant policies of the London Plan 2021 are:
- GG1 - Building strong and inclusive communities
 - GG2 - Making the best use of land
 - GG3 - Creating a healthy city
 - GG4 - Delivering the homes Londoners need
 - 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 design-led approach
 - Policy D4 - Delivering good design
 - Policy D5 - Inclusive design
 - Policy D6 - Housing quality and standards
 - 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 D13 - Agent of change
 - 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 H16 - Large-scale purpose-built shared living
 - Policy S1 - Developing London's social infrastructure
 - Policy S4 - Play and informal recreation
 - Policy E1 - Offices
 - Policy E2 - Providing suitable business space
 - Policy E3 - Affordable workspace
 - Policy E9 - Retail, markets and hot food takeaways
 - 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 G4 - Open space
- Policy G5 - Urban greening
- Policy G6 - Biodiversity and access to nature
- Policy G7 - Trees and woodlands
- Policy SI 1 - Improving air quality
- Policy SI 2 - Minimising greenhouse gas emissions
- Policy SI 3 - Energy infrastructure
- Policy SI 4 - Managing heat risk
- Policy SI 5 - Water infrastructure
- Policy SI 6 - Digital connectivity infrastructure
- Policy SI 7 - Reducing waste and supporting the circular economy
- Policy SI 8 - Waste capacity and net waste self-sufficiency
- Policy SI 12 - Flood risk management
- Policy SI 13 - Sustainable drainage
- Policy T1 - Strategic approach to transport
- Policy T2 - Healthy Streets
- Policy T3 - Transport capacity, connectivity and safeguarding
- Policy T4 - Assessing and mitigating transport impacts
- Policy T5 - Cycling
- Policy T6 - Car parking
- Policy T6.1 - Residential 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 T8 - Aviation
- Policy T9 - Funding transport infrastructure through planning
- Policy DF1 - Delivery of the Plan and planning obligations

Relevant London-level Supplementary Planning Documents/ Guidance and Strategies

7. The relevant London-level supplementary planning documents and guidance documents are as follows:
- Mayor of London: Accessible London - Achieving an Inclusive Environment (SPG, 2004)
 - Mayor of London: Affordable Housing and Viability (SPG, 2017)
 - Mayor of London: Air Quality Neutral (LPG, 2023)
 - Mayor of London: All London Green Grid (SPG, 2011)
 - Mayor of London: 'Be Seen' Energy Monitoring Guidance LPG (2022)
 - Mayor of London: Circular Economy Statements (LPG, 2022)
 - Mayor of London: Climate Change Mitigation and Energy Strategy (2010)
 - Mayor of London: Climate Change Adaptation Strategy (2011)

- Mayor of London: Crossrail Funding (SPG, 2016)
- Mayor of London: Environment Strategy (2018)
- Mayor of London: Equality, Diversity and Inclusion Strategy
- Mayor of London: Housing (SPG, 2016)
- Mayor of London: Housing Strategy (2018)
- Mayor of London: London View Management Framework (SPG, 2012)
- Mayor of London: Planning for Equality and Diversity in London (SPG, 2007)
- Mayor of London: Public London Charter (2012)
- Mayor of London: Play and Informal Recreation (SPG, 2012)
- Mayor of London: Shaping Neighbourhoods - Character and Context (SPG, 2014)
- Mayor of London: Social Infrastructure (SPG, 2015)
- Mayor of London: Sustainable transport, walking and cycling (LPG, 2022)
- Mayor of London: The Control of Dust and Emissions During Construction and Demolition (SPG, 2014)
- Mayor of London: Transport Strategy (2018)
- Mayor of London: Whole Life Carbon Assessments (LPG, 2022)

Draft GLA guidance (emerging material considerations)

8. To support the London Plan 2021, the GLA has drafted further London Planning Guidance (LPG) on topic areas including:
- Mayor of London: Characterisation and growth strategy (draft)
 - Mayor of London: Fire safety (draft)
 - Mayor of London: Housing design standards (draft)
 - Mayor of London: Large-scale purpose-built shared living (draft)
 - Mayor of London: Optimising site capacity: a design-led approach (draft)
 - Mayor of London: Urban greening factor (draft)

Southwark Plan

9. The Southwark Plan 2022 includes Strategic Policies, Area Visions and Development Management Policies. The most relevant strategic policies are as follows:
- ST1 - Southwark's development targets
 - ST2 - Southwark's places
 - SP1 - Homes for all
 - SP2 - Southwark together
 - SP3 - A great start in life
 - SP4 - Green and inclusive economy
 - SP5 - Thriving and neighbourhoods and tackling health equalities
 - SP6 - Climate emergency
 - AV.13 - Old Kent Road Area Vision
 - Policy P1 - Social rented and intermediate housing
 - Policy P2 - New family homes

- Policy P6 - Purpose built shared living
- Policy P8 - Wheelchair accessible and adaptable housing
- Policy P13 - Design of places
- Policy P14 - Design quality
- Policy P15 - Residential design
- Policy P16 - Designing out crime
- Policy P17 - Tall Buildings
- Policy P18 - Efficient use of land
- Policy P21 - Conservation of the historic environment and natural heritage
- Policy P22 - Borough Views
- Policy P23 - Archaeology
- Policy P26 - Local List
- Policy P28 - Access to employment and training
- Policy P30 - Office and business development
- Policy P31 - Affordable workspace
- Policy P36 - Development outside town centres
- Policy P39 - Shop fronts
- Policy P40 - Betting shops, pawnbrokers and pay day loan shops
- Policy P43 - Outdoor advertisements and signage
- Policy P44 - Broadband and digital infrastructure
- Policy P45 - Healthy developments
- Policy P47 - Community uses
- Policy P48 - Hot food takeaways
- Policy P49 - Public transport
- Policy P50 - Highway impacts
- Policy P51 - Walking
- Policy P53 - Cycling
- Policy P54 - Car parking
- Policy P55 - Parking standards for disabled people and the physically impaired
- Policy P56 - Protection of amenity
- Policy P57 - Open space
- Policy P59 - Green infrastructure
- Policy P60 - Biodiversity
- Policy P61 - Trees
- Policy P62 - Reducing waste
- Policy P64 - Contaminated land and hazardous substances
- Policy P65 - Improving air quality
- Policy P66 - Reducing noise pollution and enhancing soundscapes
- Policy P67 - Reducing water use
- Policy P68 - Reducing flood risk
- Policy P69 - Sustainability standards
- Policy P70 - Energy
- Policy IP1 - Infrastructure
- Policy IP2 - Transport infrastructure
- Policy IP3 - Community infrastructure levy (CIL) and Section 106 planning obligations

- Policy IP6 - Monitoring development
- Policy IP7 - Statement of community involvement

Relevant Local-level Supplementary Planning Documents

10. The relevant supplementary planning documents and guidance documents from the local development plan are as follows:
 - 2015 Technical Update to the Residential Design Standards 2011 (SPD, 2015)
 - Affordable Housing (Draft SPD, 2011)
 - Design and Access Statements (SPD, 2007)
 - Development Viability (SPD, 2016)
 - Section 106 Planning Obligations and Community Infrastructure Levy (SPD, 2015 with 2017 Addendum)
 - Sustainability Assessment (SPD, 2009)
 - Sustainable Design and Construction (SPD, 2009)
 - Sustainable Transport (SPD, 2010)

Relevant draft Area Action Plans

11. The relevant draft Area Action Plan is
 - Old Kent Road (draft AAP, 2020 consultation version)

APPENDIX 3

Planning history of the site and nearby sites

Reference:	23/AP/0387
Proposal:	Redevelopment of the site to provide two separate buildings comprising large scale purpose built shared living units, conventional residential dwellings, flexible commercial and community floorspace, a not-for-profit café community use, children's playspace, public realm improvements, landscaping and other associated works.
Location:	79-161 Ilderton Road, London, Southwark SE16 3JZ

Application site	
1.	<p><u>79-161 Ilderton Road</u></p> <p>Reference Number: 18/AP/2497 Application Type: Full Planning Permission</p> <p>Redevelopment of 79-161 Ilderton Road to provide two separate buildings, a north building and a south building separated by a publicly accessible children's playspace.</p> <p>The erection of a north building to include a part 5, part 6, part 16 and part 28 storey development (93.350m AOD max).</p> <p>The erection of a south building to include a part 3, part 5, part 8, part 13 storey development (49.275m AOD max).</p> <p>To deliver a total of 312 residential units, 448.6sqm GIA of retail floorspace (Use Class A1); 1,817.98sqm GIA of commercial floorspace (Use Class B1) and associated basement provision, disabled parking, cycle parking, children's playspace, public realm improvements and landscaping.</p> <p>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.</p> <p>Decision: Granted with legal agreement</p>

	Decision date: 21 February 2022
Other nearby sites	
2.	<p><u>257 - 283 Ilderton Road</u></p> <p>Reference Number: 23/AP/1317 Application Type: Full Planning Permission</p> <p>Demolition of the existing building and redevelopment of the site to deliver a mixed-use development comprising Purpose-Built Student Housing (Use Class Sui Generis), a new self-storage facility (Use Class B8), light Industrial workspace / incubator units (Use Class E(g)(iii)) and other associated infrastructure.</p> <p>Decision: Under consideration/assessment Decision date: Pending</p>
3.	<p><u>18-22 Penarth Street</u></p> <p>Reference Number: 22/AP/1603 Application Type: Full Planning Permission</p> <p>Demolition of existing buildings and construction of a mixed-use part 8, part 9, part 10 storey building comprising of 4,195sqm of light industrial (Class E(g)(iii) use), studio and office (Class E(g)(i and ii) use) workspaces at ground and mezzanine floor levels with 283 co-living studios and supporting amenity facilities (Sui Generis use) and 47 (36.55% Affordable by habitable rooms) residential homes (Class C3 use) above, together with servicing arrangements, cycle parking, external amenity spaces, landscaping and associated works.</p> <p>Decision: Under consideration/assessment Decision date: Pending</p>
4.	<p><u>Ilderton Wharf, 1-7 Rollins Street</u></p> <p>Reference Number: 21/AP/4757 Application Type: Full Planning Permission</p> <p>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) 163 residential apartments (Use Class C3) and other associated infrastructure.</p>

	<p>Decision: Resolution to grant, pending legal agreement Decision date: Pending</p>
5.	<p><u>301 - 303 Ilderton Road</u></p> <p>Reference Number: 20/AP/3560 Application Type: Full Planning Permission</p> <p>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.</p> <p>Decision: 28 Jun 2023 Decision date: Granted with legal agreement</p>
6.	<p><u>313-349 Ilderton Road</u></p> <p>Reference Number: 20/AP/1329 Application Type: Full Planning Permission</p> <p>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.</p> <p>Decision: Granted with legal agreement Decision date: 13 May 2021</p>
7.	<p><u>227 - 255 Ilderton Road</u></p> <p>Reference Number: 19/AP/1773 Application Type: Full Planning Permission</p> <p>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</p>

	<p>Industrial Locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location.</p> <p>Decision: Granted with legal agreement Decision date: 29 Jan 2021</p>
8.	<p><u>Iberia House, 2 Hatcham Road</u></p> <p>Reference Number: 17/AP/4649 Application Type: Full Planning Permission</p> <p>Demolition of existing light industrial building and construction of a building ranging in height from 2 to 9 storeys comprising 915.5sqm of B1 commercial and employment space at ground and first floor levels and 33 residential flats over the second to eight floor levels, with 3 residential parking spaces accessed from Hatcham Road.</p> <p>Decision: Granted with legal agreement Decision date: 29 May 2020</p>
9.	<p><u>180 Ilderton Road</u></p> <p>Reference Number: 17/AP/4546 Application Type: Full Planning Permission</p> <p>Demolition of existing building and erection of a part 5, 8 and 9 storey plus basement mixed-use development (max height 29.98m) comprising 2,351 sqm (gia) of flexible workspace (Use Class B1) and 84 residential apartments (Use Class C3) with associated amenity space and ancillary infrastructure.</p> <p>Decision: 13 Sep 2018 Decision date: Granted with legal agreement</p>
10.	<p><u>Surrey Canal Triangle</u></p> <p>London Borough of Lewisham Reference number: DC/13/085143 Application Type: Minor Material Amendment</p> <p>An application submitted under Section 73 of the Town & Country Planning Act 1990 for a minor material amendment to planning permission (DC/11/76357) for the comprehensive, phased, mixed use development of the site on the land to the north and south of Surrey Canal Road, for up to 240,000sqm (GEA) of development as set out in the revised Development Specification dated 1 July 2011 as amended 2 September 2011.</p>

The principal elements of the outline planning permission comprise up to 2,400 homes (Class C3); retail (Class A1-A5); business space (Class B1); hotel (Class C1); non-residential institutions (Class D1); assembly and leisure (Class D2) excluding the Millwall FC stadium.

The demolition of all existing buildings on the site with the exception of the Millwall FC Stadium (retained and its facade upgraded and/or re-clad), Guild House (retained and extended) and Rollins House (retained); re-profiling of site levels; alterations to Surrey Canal Road and the re-alignment of Bolina Road; associated works and landscaping in order to allow alterations to the development by way of:- The reconfiguration of buildings on Plots Timber Wharf, Stockholm 1 & 2 and Senegal Way 1& 2 and the redistribution of land uses between these Plots, within the overall approved development by floorspace area and land use.

Amendments to the massing of buildings and their heights on Plots Timber Wharf, Stockholm 1 & 2 and Senegal Way 1& 2 as well as changes to the distribution of uses amongst these Plots including the redistribution of part of the proposed residential accommodation from the south side of Surrey Canal Road to the north and of the approved leisure uses.

Amendments to the Parameter Plans to reflect the changes referred to above, principally in respect of the massing of buildings and building heights, an alteration to a parking space and loading bay, landscape, open space and public realm; massing of buildings and building heights for Plots: Timber Wharf 1 and Timber Wharf 2 (Phase 2), Stockholm 1 and Stockholm 2 (Phase 3), Senegal Way 1 and Senegal Way 2 (Phase 4).

Decision: 18 Dec 2015

Decision date: Granted with legal agreement

Consultation undertaken

Reference:	23/AP/0387
Proposal:	Redevelopment of the site to provide two separate buildings comprising large scale purpose built shared living units, conventional residential dwellings, flexible commercial and community floorspace, a not-for-profit café community use, children's playspace, public realm improvements, landscaping and other associated works.
Location:	79-161 Ilderton Road, London, Southwark SE16 3JZ

Notices:		
<u>Site Notice:</u>	Date of notice display: 20.03.2023	Expiry date of notice: 12.04.2023
<u>Press Notice:</u>	Date of notice publication: 22.06.2023	Expiry date of notice: 13.07.2023

Consultation Responses from Neighbours and Local Groups:	
Recipient Address:	Date Letter Sent:
• 25 Varcoe Road, London, Southwark	09.03.2023
• 25 Varcoe Road, London, Southwark	09.03.2023
• Flat 8, 141 Verney Road, London	09.03.2023
• Flat 8, 141 Verney Road, London	09.03.2023
• 9 Delaford Road, London, Southwark	09.03.2023
• 9 Delaford Road, London, Southwark	09.03.2023
• 31 Delaford Road, London, Southwark	09.03.2023
• 31 Delaford Road, London, Southwark	09.03.2023
• 19 Delaford Road, London, Southwark	09.03.2023
• 19 Delaford Road, London, Southwark	09.03.2023
• 27 Bramcote Grove, London, Southwark	09.03.2023
• 27 Bramcote Grove, London, Southwark	09.03.2023
• 13 Bramcote Grove, London, Southwark	09.03.2023
• 13 Bramcote Grove, London, Southwark	09.03.2023
• 2 Ablett Street, London, Southwark	09.03.2023
• 2 Ablett Street, London, Southwark	09.03.2023
• 88 Verney Road, London, Southwark	09.03.2023
• 88 Verney Road, London, Southwark	09.03.2023
• Flat 3, 114 Verney Road, London	09.03.2023
• Flat 3, 114 Verney Road, London	09.03.2023
• Flat 6, 56 Barkworth Road, London	09.03.2023
• Flat 6, 56 Barkworth Road, London	09.03.2023
• 43 Barkworth Road, London, Southwark	09.03.2023
• 43 Barkworth Road, London, Southwark	09.03.2023
• 35 Barkworth Road, London, Southwark	09.03.2023
• 35 Barkworth Road, London, Southwark	09.03.2023
• Flat 6, 16 Barkworth Road, London	09.03.2023
• Flat 6, 16 Barkworth Road, London	09.03.2023
• 20 Barkworth Road, London, Southwark	09.03.2023
• 20 Barkworth Road, London, Southwark	09.03.2023

• Flat 8, Atar House, 179 Ilderton Road	09.03.2023
• Flat 8, Atar House, 179 Ilderton Road	09.03.2023
• Flat 9, 141 Verney Road, London	09.03.2023
• Flat 9, 141 Verney Road, London	09.03.2023
• Flat 3, 141 Verney Road, London	09.03.2023
• Flat 3, 141 Verney Road, London	09.03.2023
• 25 Ablett Street, London, Southwark	09.03.2023
• 25 Ablett Street, London, Southwark	09.03.2023
• Flat 1, 45 Barkworth Road, London	09.03.2023
• Flat 1, 45 Barkworth Road, London	09.03.2023
• Flat 3, 77 Ilderton Road, London	09.03.2023
• Flat 3, 77 Ilderton Road, London	09.03.2023
• 30 Ablett Street, London, Southwark	09.03.2023
• 30 Ablett Street, London, Southwark	09.03.2023
• 23 Delaford Road, London, Southwark	09.03.2023
• 23 Delaford Road, London, Southwark	09.03.2023
• 32 Delaford Road, London, Southwark	09.03.2023
• 32 Delaford Road, London, Southwark	09.03.2023
• 34 Delaford Road, London, Southwark	09.03.2023
• 34 Delaford Road, London, Southwark	09.03.2023
• Flat 1, 114 Verney Road, London	09.03.2023
• Flat 1, 114 Verney Road, London	09.03.2023
• Flat 6, 47 Barkworth Road, London	09.03.2023
• Flat 6, 47 Barkworth Road, London	09.03.2023
• Flat 3, 47 Barkworth Road, London	09.03.2023
• Flat 3, 47 Barkworth Road, London	09.03.2023
• Flat 4, 56 Barkworth Road, London	09.03.2023
• Flat 4, 56 Barkworth Road, London	09.03.2023
• Flat 6, 54 Barkworth Road, London	09.03.2023
• Flat 6, 54 Barkworth Road, London	09.03.2023
• 33 Barkworth Road, London, Southwark	09.03.2023
• 33 Barkworth Road, London, Southwark	09.03.2023
• 48 Barkworth Road, London, Southwark	09.03.2023
• 48 Barkworth Road, London, Southwark	09.03.2023
• 14 Delaford Road, London, Southwark	09.03.2023
• 14 Delaford Road, London, Southwark	09.03.2023
• 33 Delaford Road, London, Southwark	09.03.2023
• 33 Delaford Road, London, Southwark	09.03.2023
• 21 Bramcote Grove, London, Southwark	09.03.2023
• 21 Bramcote Grove, London, Southwark	09.03.2023
• 37 Ablett Street, London, Southwark	09.03.2023
• 37 Ablett Street, London, Southwark	09.03.2023
• 19 Ablett Street, London, Southwark	09.03.2023
• 19 Ablett Street, London, Southwark	09.03.2023
• Flat 14, 141 Verney Road, London	09.03.2023
• Flat 14, 141 Verney Road, London	09.03.2023
• 41 Ilderton Road, London, Southwark	09.03.2023
• 41 Ilderton Road, London, Southwark	09.03.2023
• 37 Ilderton Road, London, Southwark	09.03.2023
• 37 Ilderton Road, London, Southwark	09.03.2023
• 30 Delaford Road, London, Southwark	09.03.2023
• 30 Delaford Road, London, Southwark	09.03.2023
• 5 Delaford Road, London, Southwark	09.03.2023

• 5 Delaford Road, London, Southwark	09.03.2023
• 29 Delaford Road, London, Southwark	09.03.2023
• 29 Delaford Road, London, Southwark	09.03.2023
• 31 Bramcote Grove, London, Southwark	09.03.2023
• 31 Bramcote Grove, London, Southwark	09.03.2023
• 1 Ablett Street, London, Southwark	09.03.2023
• 1 Ablett Street, London, Southwark	09.03.2023
• Flat 4, 55 Varcoe Road, London	09.03.2023
• Flat 4, 55 Varcoe Road, London	09.03.2023
• 41 Varcoe Road, London, Southwark	09.03.2023
• 41 Varcoe Road, London, Southwark	09.03.2023
• 26 Ablett Street, London, Southwark	09.03.2023
• 26 Ablett Street, London, Southwark	09.03.2023
• 4 Ablett Street, London, Southwark	09.03.2023
• 4 Ablett Street, London, Southwark	09.03.2023
• 8 Splendour Walk, London, Southwark	09.03.2023
• 8 Splendour Walk, London, Southwark	09.03.2023
• 104 Verney Road, London, Southwark	09.03.2023
• 104 Verney Road, London, Southwark	09.03.2023
• 90 Verney Road, London, Southwark	09.03.2023
• 90 Verney Road, London, Southwark	09.03.2023
• Flat 2, 114 Verney Road, London	09.03.2023
• Flat 2, 114 Verney Road, London	09.03.2023
• Flat 7, 47 Barkworth Road, London	09.03.2023
• Flat 7, 47 Barkworth Road, London	09.03.2023
• Flat 4, 47 Barkworth Road, London	09.03.2023
• Flat 4, 47 Barkworth Road, London	09.03.2023
• Flat 6, 77 Ilderton Road, London	09.03.2023
• Flat 6, 77 Ilderton Road, London	09.03.2023
• Flat 5, Atar House, 179 Ilderton Road	09.03.2023
• Flat 5, Atar House, 179 Ilderton Road	09.03.2023
• Flat 104, Milli House, 171 - 177 Ilderton Road	09.03.2023
• Flat 104, Milli House, 171 - 177 Ilderton Road	09.03.2023
• 3 Delaford Road, London, Southwark	09.03.2023
• 3 Delaford Road, London, Southwark	09.03.2023
• 13 Delaford Road, London, Southwark	09.03.2023
• 13 Delaford Road, London, Southwark	09.03.2023
• Flat 1, 54 Barkworth Road, London	09.03.2023
• Flat 1, 54 Barkworth Road, London	09.03.2023
• 24 Ablett Street, London, Southwark	09.03.2023
• 24 Ablett Street, London, Southwark	09.03.2023
• 11 Delaford Road, London, Southwark	09.03.2023
• 11 Delaford Road, London, Southwark	09.03.2023
• 28 Barkworth Road, London, Southwark	09.03.2023
• 28 Barkworth Road, London, Southwark	09.03.2023
• 51 Varcoe Road, London, Southwark	09.03.2023
• 51 Varcoe Road, London, Southwark	09.03.2023
• Flat 2, 16 Barkworth Road, London	09.03.2023
• Flat 2, 16 Barkworth Road, London	09.03.2023
• 33 Varcoe Road, London, Southwark	09.03.2023
• 33 Varcoe Road, London, Southwark	09.03.2023
• Flat 5, 77 Ilderton Road, London	09.03.2023
• Flat 5, 77 Ilderton Road, London	09.03.2023

• South Bermondsey Railway Station, Rotherhithe New Road	09.03.2023
• Flat 11, 141 Verney Road, London	09.03.2023
• Flat 11, 141 Verney Road, London	09.03.2023
• 37 Delaford Road, London, Southwark	09.03.2023
• 37 Delaford Road, London, Southwark	09.03.2023
• 27 Delaford Road, London, Southwark	09.03.2023
• 27 Delaford Road, London, Southwark	09.03.2023
• 3 Bramcote Grove, London, Southwark	09.03.2023
• 3 Bramcote Grove, London, Southwark	09.03.2023
• Flat 4, 59 Varcoe Road, London	09.03.2023
• Flat 4, 59 Varcoe Road, London	09.03.2023
• Flat 5, 55 Varcoe Road, London	09.03.2023
• Flat 5, 55 Varcoe Road, London	09.03.2023
• 43 Varcoe Road, London, Southwark	09.03.2023
• 43 Varcoe Road, London, Southwark	09.03.2023
• 20 Ablett Street, London, Southwark	09.03.2023
• 20 Ablett Street, London, Southwark	09.03.2023
• Flat 6, 114 Verney Road, London	09.03.2023
• Flat 6, 114 Verney Road, London	09.03.2023
• Flat 2, 47 Barkworth Road, London	09.03.2023
• Flat 2, 47 Barkworth Road, London	09.03.2023
• Flat 3, 56 Barkworth Road, London	09.03.2023
• Flat 3, 56 Barkworth Road, London	09.03.2023
• Flat 8, 54 Barkworth Road, London	09.03.2023
• Flat 8, 54 Barkworth Road, London	09.03.2023
• Flat 7, 54 Barkworth Road, London	09.03.2023
• Flat 7, 54 Barkworth Road, London	09.03.2023
• Flat 5, 54 Barkworth Road, London	09.03.2023
• Flat 5, 54 Barkworth Road, London	09.03.2023
• 29 Barkworth Road, London, Southwark	09.03.2023
• 29 Barkworth Road, London, Southwark	09.03.2023
• 50 Barkworth Road, London, Southwark	09.03.2023
• 50 Barkworth Road, London, Southwark	09.03.2023
• 36 Barkworth Road, London, Southwark	09.03.2023
• 36 Barkworth Road, London, Southwark	09.03.2023
• Flat 9, Atar House, 179 Ilderton Road	09.03.2023
• Flat 9, Atar House, 179 Ilderton Road	09.03.2023
• Flat 10, 141 Verney Road, London	09.03.2023
• Flat 10, 141 Verney Road, London	09.03.2023
• 12 A Sylvan Grove, London, SE15 1AR	09.03.2023
• 136 kingsland high street, dalston, london	09.03.2023
• 19 Bramcote Grove, London, Southwark	09.03.2023
• 19 Bramcote Grove, London, Southwark	09.03.2023
• Unit A, Milli House, 171 - 177 Ilderton Road	09.03.2023
• Unit A, Milli House, 171 - 177 Ilderton Road	09.03.2023
• Flat 301, Milli House, 171 - 177 Ilderton Road	09.03.2023
• Flat 301, Milli House, 171 - 177 Ilderton Road	09.03.2023
• Flat 203, Milli House, 171 - 177 Ilderton Road	09.03.2023
• Flat 203, Milli House, 171 - 177 Ilderton Road	09.03.2023
• 29 Ilderton Road, London, Southwark	09.03.2023
• 29 Ilderton Road, London, Southwark	09.03.2023
• 24 Barkworth Road, London, Southwark	09.03.2023
• 24 Barkworth Road, London, Southwark	09.03.2023

• Flat 3, 54 Barkworth Road, London	09.03.2023
• Flat 3, 54 Barkworth Road, London	09.03.2023
• 41 Delaford Road, London, Southwark	09.03.2023
• 41 Delaford Road, London, Southwark	09.03.2023
• 33 Bramcote Grove, London, Southwark	09.03.2023
• 33 Bramcote Grove, London, Southwark	09.03.2023
• Flat 7, 56 Barkworth Road, London	09.03.2023
• Flat 7, 56 Barkworth Road, London	09.03.2023
• 131 Verney Road, London, Southwark	09.03.2023
• 131 Verney Road, London, Southwark	09.03.2023
• 47 Ilderton Road, London, Southwark	09.03.2023
• 47 Ilderton Road, London, Southwark	09.03.2023
• Flat 1, 56 Barkworth Road, London	09.03.2023
• Flat 1, 56 Barkworth Road, London	09.03.2023
• 41 Barkworth Road, London, Southwark	09.03.2023
• 41 Barkworth Road, London, Southwark	09.03.2023
• 22 Ablett Street, London, Southwark	09.03.2023
• 22 Ablett Street, London, Southwark	09.03.2023
• 39 Varcoe Road, London, Southwark	09.03.2023
• 39 Varcoe Road, London, Southwark	09.03.2023
• 92 Verney Road, London, Southwark	09.03.2023
• 92 Verney Road, London, Southwark	09.03.2023
• Ilderton Primary School, Ilderton Road, London	09.03.2023
• Ilderton Primary School, Ilderton Road, London	09.03.2023
• 32 Barkworth Road, London, Southwark	09.03.2023
• 32 Barkworth Road, London, Southwark	09.03.2023
• 31 Ilderton Road, London, Southwark	09.03.2023
• 31 Ilderton Road, London, Southwark	09.03.2023
• 24 Delaford Road, London, Southwark	09.03.2023
• 24 Delaford Road, London, Southwark	09.03.2023
• 25 Delaford Road, London, Southwark	09.03.2023
• 25 Delaford Road, London, Southwark	09.03.2023
• 21 Delaford Road, London, Southwark	09.03.2023
• 21 Delaford Road, London, Southwark	09.03.2023
• 7 Bramcote Grove, London, Southwark	09.03.2023
• 7 Bramcote Grove, London, Southwark	09.03.2023
• 35 Ablett Street, London, Southwark	09.03.2023
• 35 Ablett Street, London, Southwark	09.03.2023
• 29 Ablett Street, London, Southwark	09.03.2023
• 29 Ablett Street, London, Southwark	09.03.2023
• 23 Ablett Street, London, Southwark	09.03.2023
• 23 Ablett Street, London, Southwark	09.03.2023
• 16 Ablett Street, London, Southwark	09.03.2023
• 16 Ablett Street, London, Southwark	09.03.2023
• 12 Ablett Street, London, Southwark	09.03.2023
• 12 Ablett Street, London, Southwark	09.03.2023
• 37 Bramcote Grove, London, Southwark	09.03.2023
• 37 Bramcote Grove, London, Southwark	09.03.2023
• Flat 8, 56 Barkworth Road, London	09.03.2023
• Flat 8, 56 Barkworth Road, London	09.03.2023
• Flat 4, 54 Barkworth Road, London	09.03.2023
• Flat 4, 54 Barkworth Road, London	09.03.2023
• Flat 6, 52 Barkworth Road, London	09.03.2023

• Flat 6, 52 Barkworth Road, London	09.03.2023
• Flat 3, 52 Barkworth Road, London	09.03.2023
• Flat 3, 52 Barkworth Road, London	09.03.2023
• 22 Barkworth Road, London, Southwark	09.03.2023
• 22 Barkworth Road, London, Southwark	09.03.2023
• Flat 201, Milli House, 171 - 177 Ilderton Road	09.03.2023
• Flat 201, Milli House, 171 - 177 Ilderton Road	09.03.2023
• Flat 103, Milli House, 171 - 177 Ilderton Road	09.03.2023
• Flat 103, Milli House, 171 - 177 Ilderton Road	09.03.2023
• Flat 4, 77 Ilderton Road, London	09.03.2023
• Flat 4, 77 Ilderton Road, London	09.03.2023
• Flat 7, Atar House, 179 Ilderton Road	09.03.2023
• Flat 7, Atar House, 179 Ilderton Road	09.03.2023
• 34 Barkworth Road, London, Southwark	09.03.2023
• 34 Barkworth Road, London, Southwark	09.03.2023
• Flat 6, 55 Varcoe Road, London	09.03.2023
• Flat 6, 55 Varcoe Road, London	09.03.2023
• Flat 5, 45 Barkworth Road, London	09.03.2023
• Flat 5, 45 Barkworth Road, London	09.03.2023
• Flat 8, 52 Barkworth Road, London	09.03.2023
• Flat 8, 52 Barkworth Road, London	09.03.2023
• 1 Delaford Road, London, Southwark	09.03.2023
• 1 Delaford Road, London, Southwark	09.03.2023
• 5 Bramcote Grove, London, Southwark	09.03.2023
• 5 Bramcote Grove, London, Southwark	09.03.2023
• 8 Ablett Street, London, Southwark	09.03.2023
• 8 Ablett Street, London, Southwark	09.03.2023
• Flat 3, 55 Varcoe Road, London	09.03.2023
• Flat 3, 55 Varcoe Road, London	09.03.2023
• Flat 4, 114 Verney Road, London	09.03.2023
• Flat 4, 114 Verney Road, London	09.03.2023
• 31 Ablett Street, London, Southwark	09.03.2023
• 31 Ablett Street, London, Southwark	09.03.2023
• Flat 4, 141 Verney Road, London	09.03.2023
• Flat 4, 141 Verney Road, London	09.03.2023
• 38 Delaford Road, London, Southwark	09.03.2023
• 38 Delaford Road, London, Southwark	09.03.2023
• 22 Delaford Road, London, Southwark	09.03.2023
• 22 Delaford Road, London, Southwark	09.03.2023
• 43 Delaford Road, London, Southwark	09.03.2023
• 43 Delaford Road, London, Southwark	09.03.2023
• 35 Delaford Road, London, Southwark	09.03.2023
• 35 Delaford Road, London, Southwark	09.03.2023
• Flat 5, 56 Barkworth Road, London	09.03.2023
• Flat 5, 56 Barkworth Road, London	09.03.2023
• Flat 7, 52 Barkworth Road, London	09.03.2023
• Flat 7, 52 Barkworth Road, London	09.03.2023
• 37 Barkworth Road, London, Southwark	09.03.2023
• 37 Barkworth Road, London, Southwark	09.03.2023
• Unit A, Atar House, 179 Ilderton Road	09.03.2023
• Unit A, Atar House, 179 Ilderton Road	09.03.2023
• Flat 1, Atar House, 179 Ilderton Road	09.03.2023
• Flat 1, Atar House, 179 Ilderton Road	09.03.2023

• Flat 13, 141 Verney Road, London	09.03.2023
• Flat 13, 141 Verney Road, London	09.03.2023
• Flat 1, 141 Verney Road, London	09.03.2023
• Flat 1, 141 Verney Road, London	09.03.2023
• Flat 204, Milli House, 171 - 177 Ilderton Road	09.03.2023
• Flat 204, Milli House, 171 - 177 Ilderton Road	09.03.2023
• 23 Ilderton Road, London, Southwark	09.03.2023
• 23 Ilderton Road, London, Southwark	09.03.2023
• 31 Barkworth Road, London, Southwark	09.03.2023
• 31 Barkworth Road, London, Southwark	09.03.2023
• Flat 3, Atar House, 179 Ilderton Road	09.03.2023
• Flat 3, Atar House, 179 Ilderton Road	09.03.2023
• Flat 2, 77 Ilderton Road, London	09.03.2023
• Flat 2, 77 Ilderton Road, London	09.03.2023
• 15 Ablett Street, London, Southwark	09.03.2023
• 15 Ablett Street, London, Southwark	09.03.2023
• Flat 2, 45 Barkworth Road, London	09.03.2023
• Flat 2, 45 Barkworth Road, London	09.03.2023
• 123 Verney Road, London, Southwark	09.03.2023
• 123 Verney Road, London, Southwark	09.03.2023
• 39 Ilderton Road, London, Southwark	09.03.2023
• 39 Ilderton Road, London, Southwark	09.03.2023
• Flat 5, 16 Barkworth Road, London	09.03.2023
• Flat 5, 16 Barkworth Road, London	09.03.2023
• Flat 2, 59 Varcoe Road, London	09.03.2023
• Flat 2, 59 Varcoe Road, London	09.03.2023
• 86 Verney Road, London, Southwark	09.03.2023
• 86 Verney Road, London, Southwark	09.03.2023
• 27 Ablett Street, London, Southwark	09.03.2023
• 27 Ablett Street, London, Southwark	09.03.2023
• 18 Barkworth Road, London, Southwark	09.03.2023
• 18 Barkworth Road, London, Southwark	09.03.2023
• Flat 10, Atar House, 179 Ilderton Road	09.03.2023
• Flat 10, Atar House, 179 Ilderton Road	09.03.2023
• 43 Ilderton Road, London, Southwark	09.03.2023
• 43 Ilderton Road, London, Southwark	09.03.2023
• 27 Ilderton Road, London, Southwark	09.03.2023
• 27 Ilderton Road, London, Southwark	09.03.2023
• 25 Ilderton Road, London, Southwark	09.03.2023
• 25 Ilderton Road, London, Southwark	09.03.2023
• 36 Delaford Road, London, Southwark	09.03.2023
• 36 Delaford Road, London, Southwark	09.03.2023
• 16 Delaford Road, London, Southwark	09.03.2023
• 16 Delaford Road, London, Southwark	09.03.2023
• 9 Bramcote Grove, London, Southwark	09.03.2023
• 9 Bramcote Grove, London, Southwark	09.03.2023
• 3 Ablett Street, London, Southwark	09.03.2023
• 3 Ablett Street, London, Southwark	09.03.2023
• 11 Ablett Street, London, Southwark	09.03.2023
• 11 Ablett Street, London, Southwark	09.03.2023
• 61 Varcoe Road, London, Southwark	09.03.2023
• 61 Varcoe Road, London, Southwark	09.03.2023
• Flat 2, 55 Varcoe Road, London	09.03.2023

• Flat 2, 55 Varcoe Road, London	09.03.2023
• 6 Splendour Walk, London, Southwark	09.03.2023
• 6 Splendour Walk, London, Southwark	09.03.2023
• 32 Ablett Street, London, Southwark	09.03.2023
• 32 Ablett Street, London, Southwark	09.03.2023
• 28 Ablett Street, London, Southwark	09.03.2023
• 28 Ablett Street, London, Southwark	09.03.2023
• Flat 1, 35 Bramcote Grove, London	09.03.2023
• Flat 1, 35 Bramcote Grove, London	09.03.2023
• 9 Splendour Walk, London, Southwark	09.03.2023
• 9 Splendour Walk, London, Southwark	09.03.2023
• 110 Verney Road, London, Southwark	09.03.2023
• 110 Verney Road, London, Southwark	09.03.2023
• Flat 8, 47 Barkworth Road, London	09.03.2023
• Flat 8, 47 Barkworth Road, London	09.03.2023
• Flat 5, 47 Barkworth Road, London	09.03.2023
• Flat 5, 47 Barkworth Road, London	09.03.2023
• Flat 6, 45 Barkworth Road, London	09.03.2023
• Flat 6, 45 Barkworth Road, London	09.03.2023
• 39 Barkworth Road, London, Southwark	09.03.2023
• 39 Barkworth Road, London, Southwark	09.03.2023
• Flat 1, 16 Barkworth Road, London	09.03.2023
• Flat 1, 16 Barkworth Road, London	09.03.2023
• 44 Barkworth Road, London, Southwark	09.03.2023
• 44 Barkworth Road, London, Southwark	09.03.2023
• Flat 102, Milli House, 171 - 177 Ilderton Road	09.03.2023
• Flat 102, Milli House, 171 - 177 Ilderton Road	09.03.2023
• Flat 101, Milli House, 171 - 177 Ilderton Road	09.03.2023
• Flat 101, Milli House, 171 - 177 Ilderton Road	09.03.2023
• 45 Ilderton Road, London, Southwark	09.03.2023
• 45 Ilderton Road, London, Southwark	09.03.2023
• 18 Ablett Street, London, Southwark	09.03.2023
• 18 Ablett Street, London, Southwark	09.03.2023
• 108 Verney Road, London, Southwark	09.03.2023
• 108 Verney Road, London, Southwark	09.03.2023
• 106 Verney Road, London, Southwark	09.03.2023
• 106 Verney Road, London, Southwark	09.03.2023
• 1 Splendour Walk, London, Southwark	09.03.2023
• 1 Splendour Walk, London, Southwark	09.03.2023
• Flat 2, 35 Bramcote Grove, London	09.03.2023
• Flat 2, 35 Bramcote Grove, London	09.03.2023
• 137 Verney Road, London, Southwark	09.03.2023
• 137 Verney Road, London, Southwark	09.03.2023
• 21 Ilderton Road, London, Southwark	09.03.2023
• 21 Ilderton Road, London, Southwark	09.03.2023
• 15 Delaford Road, London, Southwark	09.03.2023
• 15 Delaford Road, London, Southwark	09.03.2023
• 25 Bramcote Grove, London, Southwark	09.03.2023
• 25 Bramcote Grove, London, Southwark	09.03.2023
• 7 Ablett Street, London, Southwark	09.03.2023
• 7 Ablett Street, London, Southwark	09.03.2023
• 21 Ablett Street, London, Southwark	09.03.2023
• 21 Ablett Street, London, Southwark	09.03.2023

• 17 Ablett Street, London, Southwark	09.03.2023
• 17 Ablett Street, London, Southwark	09.03.2023
• 57 Varcoe Road, London, Southwark	09.03.2023
• 57 Varcoe Road, London, Southwark	09.03.2023
• 45 Varcoe Road, London, Southwark	09.03.2023
• 45 Varcoe Road, London, Southwark	09.03.2023
• 37 Varcoe Road, London, Southwark	09.03.2023
• 37 Varcoe Road, London, Southwark	09.03.2023
• 35 Varcoe Road, London, Southwark	09.03.2023
• 35 Varcoe Road, London, Southwark	09.03.2023
• 31 Varcoe Road, London, Southwark	09.03.2023
• 31 Varcoe Road, London, Southwark	09.03.2023
• 7 Splendour Walk, London, Southwark	09.03.2023
• 7 Splendour Walk, London, Southwark	09.03.2023
• 34 Ablett Street, London, Southwark	09.03.2023
• 34 Ablett Street, London, Southwark	09.03.2023
• 6 Ablett Street, London, Southwark	09.03.2023
• 6 Ablett Street, London, Southwark	09.03.2023
• 100 Verney Road, London, Southwark	09.03.2023
• 100 Verney Road, London, Southwark	09.03.2023
• 96 Verney Road, London, Southwark	09.03.2023
• 96 Verney Road, London, Southwark	09.03.2023
• 84 Verney Road, London, Southwark	09.03.2023
• 84 Verney Road, London, Southwark	09.03.2023
• 135 Verney Road, London, Southwark	09.03.2023
• 135 Verney Road, London, Southwark	09.03.2023
• 133 Verney Road, London, Southwark	09.03.2023
• 133 Verney Road, London, Southwark	09.03.2023
• Flat 4, 52 Barkworth Road, London	09.03.2023
• Flat 4, 52 Barkworth Road, London	09.03.2023
• Flat 1, 52 Barkworth Road, London	09.03.2023
• Flat 1, 52 Barkworth Road, London	09.03.2023
• Flat 3, 16 Barkworth Road, London	09.03.2023
• Flat 3, 16 Barkworth Road, London	09.03.2023
• 46 Barkworth Road, London, Southwark	09.03.2023
• 46 Barkworth Road, London, Southwark	09.03.2023
• 40 Barkworth Road, London, Southwark	09.03.2023
• 40 Barkworth Road, London, Southwark	09.03.2023
• 30 Barkworth Road, London, Southwark	09.03.2023
• 30 Barkworth Road, London, Southwark	09.03.2023
• Flat 1, 77 Ilderton Road, London	09.03.2023
• Flat 1, 77 Ilderton Road, London	09.03.2023
• Flat 5, 141 Verney Road, London	09.03.2023
• Flat 5, 141 Verney Road, London	09.03.2023
• Flat 2, 141 Verney Road, London	09.03.2023
• Flat 2, 141 Verney Road, London	09.03.2023
• Flat 12, 141 Verney Road, London	09.03.2023
• Flat 12, 141 Verney Road, London	09.03.2023
• Flat 6, 141 Verney Road, London	09.03.2023
• Flat 6, 141 Verney Road, London	09.03.2023
• 77 Ilderton Road, London, Southwark	09.03.2023
• 77 Ilderton Road, London, Southwark	09.03.2023
• 39 Jarrow Road, London, Southwark	09.03.2023

• 39 Jarrow Road, London, Southwark	09.03.2023
• 33 Ilderton Road, London, Southwark	09.03.2023
• 33 Ilderton Road, London, Southwark	09.03.2023
• Flat 11, Atar House, 179 Ilderton Road	09.03.2023
• Flat 11, Atar House, 179 Ilderton Road	09.03.2023
• Flat 1, 55 Varcoe Road, London	09.03.2023
• Flat 1, 55 Varcoe Road, London	09.03.2023
• 18 Delaford Road, London, Southwark	09.03.2023
• 18 Delaford Road, London, Southwark	09.03.2023
• 17 Bramcote Grove, London, Southwark	09.03.2023
• 17 Bramcote Grove, London, Southwark	09.03.2023
• Flat 5, 114 Verney Road, London	09.03.2023
• Flat 5, 114 Verney Road, London	09.03.2023
• Christ Apostolic Church, 163 Ilderton Road, London	09.03.2023
• Christ Apostolic Church, 163 Ilderton Road, London	09.03.2023
• 29 Bramcote Grove, London, Southwark	09.03.2023
• 29 Bramcote Grove, London, Southwark	09.03.2023
• Flat 2, 54 Barkworth Road, London	09.03.2023
• Flat 2, 54 Barkworth Road, London	09.03.2023
• 25 Barkworth Road, London, Southwark	09.03.2023
• 25 Barkworth Road, London, Southwark	09.03.2023
• 20 Delaford Road, London, Southwark	09.03.2023
• 20 Delaford Road, London, Southwark	09.03.2023
• Flat 5, 52 Barkworth Road, London	09.03.2023
• Flat 5, 52 Barkworth Road, London	09.03.2023
• Flat 2, 52 Barkworth Road, London	09.03.2023
• Flat 2, 52 Barkworth Road, London	09.03.2023
• 39 Delaford Road, London, Southwark	09.03.2023
• 39 Delaford Road, London, Southwark	09.03.2023
• 2 Splendour Walk, London, Southwark	09.03.2023
• 2 Splendour Walk, London, Southwark	09.03.2023
• 53 Varcoe Road, London, Southwark	09.03.2023
• 53 Varcoe Road, London, Southwark	09.03.2023
• 28 Delaford Road, London, Southwark	09.03.2023
• 28 Delaford Road, London, Southwark	09.03.2023
• 27 Barkworth Road, London, Southwark	09.03.2023
• 27 Barkworth Road, London, Southwark	09.03.2023
• 7 Delaford Road, London, Southwark	09.03.2023
• 7 Delaford Road, London, Southwark	09.03.2023
• 1 Bramcote Grove, London, Southwark	09.03.2023
• 1 Bramcote Grove, London, Southwark	09.03.2023
• 14 Ablett Street, London, Southwark	09.03.2023
• 14 Ablett Street, London, Southwark	09.03.2023
• 119 Verney Road, London, Southwark	09.03.2023
• 119 Verney Road, London, Southwark	09.03.2023
• 13 Ablett Street, London, Southwark	09.03.2023
• 13 Ablett Street, London, Southwark	09.03.2023
• 38 Barkworth Road, London, Southwark	09.03.2023
• 38 Barkworth Road, London, Southwark	09.03.2023
• 26 Barkworth Road, London, Southwark	09.03.2023
• 26 Barkworth Road, London, Southwark	09.03.2023
• Flat 2, Atar House, 179 Ilderton Road	09.03.2023
• Flat 2, Atar House, 179 Ilderton Road	09.03.2023

• 35 Ilderton Road, London, Southwark	09.03.2023
• 35 Ilderton Road, London, Southwark	09.03.2023
• 12 Delaford Road, London, Southwark	09.03.2023
• 12 Delaford Road, London, Southwark	09.03.2023
• 23 Bramcote Grove, London, Southwark	09.03.2023
• 23 Bramcote Grove, London, Southwark	09.03.2023
• 33 Ablett Street, London, Southwark	09.03.2023
• 33 Ablett Street, London, Southwark	09.03.2023
• Flat 3, 59 Varcoe Road, London	09.03.2023
• Flat 3, 59 Varcoe Road, London	09.03.2023
• Flat 1, 59 Varcoe Road, London	09.03.2023
• Flat 1, 59 Varcoe Road, London	09.03.2023
• 29 Varcoe Road, London, Southwark	09.03.2023
• 29 Varcoe Road, London, Southwark	09.03.2023
• 27 Varcoe Road, London, Southwark	09.03.2023
• 27 Varcoe Road, London, Southwark	09.03.2023
• 3 Splendour Walk, London, Southwark	09.03.2023
• 3 Splendour Walk, London, Southwark	09.03.2023
• 94 Verney Road, London, Southwark	09.03.2023
• 94 Verney Road, London, Southwark	09.03.2023
• 129 Verney Road, London, Southwark	09.03.2023
• 129 Verney Road, London, Southwark	09.03.2023
• 127 Verney Road, London, Southwark	09.03.2023
• 127 Verney Road, London, Southwark	09.03.2023
• Flat 3, 45 Barkworth Road, London	09.03.2023
• Flat 3, 45 Barkworth Road, London	09.03.2023
• Flat 4, 16 Barkworth Road, London	09.03.2023
• Flat 4, 16 Barkworth Road, London	09.03.2023
• Flat 6, Atar House, 179 Ilderton Road	09.03.2023
• Flat 6, Atar House, 179 Ilderton Road	09.03.2023
• Flat 7, 141 Verney Road, London	09.03.2023
• Flat 7, 141 Verney Road, London	09.03.2023
• Unit B, Milli House, 171 - 177 Ilderton Road	09.03.2023
• Unit B, Milli House, 171 - 177 Ilderton Road	09.03.2023
• Flat 202, Milli House, 171 - 177 Ilderton Road	09.03.2023
• Flat 202, Milli House, 171 - 177 Ilderton Road	09.03.2023
• Flat 12, Atar House, 179 Ilderton Road	09.03.2023
• Flat 12, Atar House, 179 Ilderton Road	09.03.2023
• 49 Ilderton Road, London, Southwark	09.03.2023
• 49 Ilderton Road, London, Southwark	09.03.2023
• 121 Verney Road, London, Southwark	09.03.2023
• 121 Verney Road, London, Southwark	09.03.2023
• 42 Barkworth Road, London, Southwark	09.03.2023
• 42 Barkworth Road, London, Southwark	09.03.2023
• 179A Ilderton Road, London, Southwark	09.03.2023
• 179A Ilderton Road, London, Southwark	09.03.2023
• 9 Ablett Street, London, Southwark	09.03.2023
• 9 Ablett Street, London, Southwark	09.03.2023
• 102 Verney Road, London, Southwark	09.03.2023
• 102 Verney Road, London, Southwark	09.03.2023
• Flat 4, 45 Barkworth Road, London	09.03.2023
• Flat 4, 45 Barkworth Road, London	09.03.2023
• Flat 8, 45 Barkworth Road, London	09.03.2023

• Flat 8, 45 Barkworth Road, London	09.03.2023
• 17 Delaford Road, London, Southwark	09.03.2023
• 17 Delaford Road, London, Southwark	09.03.2023
• 15 Bramcote Grove, London, Southwark	09.03.2023
• 15 Bramcote Grove, London, Southwark	09.03.2023
• 5 Splendour Walk, London, Southwark	09.03.2023
• 5 Splendour Walk, London, Southwark	09.03.2023
• 47 Varcoe Road, London, Southwark	09.03.2023
• 47 Varcoe Road, London, Southwark	09.03.2023
• 112 Verney Road, London, Southwark	09.03.2023
• 112 Verney Road, London, Southwark	09.03.2023
• 98 Verney Road, London, Southwark	09.03.2023
• 98 Verney Road, London, Southwark	09.03.2023
• Flat 4, Atar House, 179 Ilderton Road	09.03.2023
• Flat 4, Atar House, 179 Ilderton Road	09.03.2023
• 1A Zampa Road, London, Southwark	09.03.2023
• 1A Zampa Road, London, Southwark	09.03.2023
• 26 Delaford Road, London, Southwark	09.03.2023
• 26 Delaford Road, London, Southwark	09.03.2023
• 11 Bramcote Grove, London, Southwark	09.03.2023
• 11 Bramcote Grove, London, Southwark	09.03.2023
• 5 Ablett Street, London, Southwark	09.03.2023
• 5 Ablett Street, London, Southwark	09.03.2023
• 49 Varcoe Road, London, Southwark	09.03.2023
• 49 Varcoe Road, London, Southwark	09.03.2023
• 4 Splendour Walk, London, Southwark	09.03.2023
• 4 Splendour Walk, London, Southwark	09.03.2023
• 10 Ablett Street, London, Southwark	09.03.2023
• 10 Ablett Street, London, Southwark	09.03.2023
• 125 Verney Road, London, Southwark	09.03.2023
• 125 Verney Road, London, Southwark	09.03.2023
• Flat 1, 47 Barkworth Road, London	09.03.2023
• Flat 1, 47 Barkworth Road, London	09.03.2023
• Flat 7, 45 Barkworth Road, London	09.03.2023
• Flat 7, 45 Barkworth Road, London	09.03.2023
• Flat 2, 56 Barkworth Road, London	09.03.2023
• Flat 2, 56 Barkworth Road, London	09.03.2023
• Ilderton Primary School, Varcoe Road, Southwark	09.03.2023
• Premier House, 52 London Road, Twickenham TW1 3RP	09.03.2023

Re-consultation Letters to Neighbours and Local Groups:

Recipient Address:

Date Letter Sent:

• 25 Varcoe Road, London, Southwark	19.06.2023
• Flat 8, 141 Verney Road, London	19.06.2023
• 9 Delaford Road, London, Southwark	19.06.2023
• 31 Delaford Road, London, Southwark	19.06.2023
• 19 Delaford Road, London, Southwark	19.06.2023
• 27 Bramcote Grove, London, Southwark	19.06.2023
• 13 Bramcote Grove, London, Southwark	19.06.2023
• 2 Ablett Street, London, Southwark	19.06.2023
• 88 Verney Road, London, Southwark	19.06.2023
• Flat 3, 114 Verney Road, London	19.06.2023
• Flat 6, 56 Barkworth Road, London	19.06.2023

• 43 Barkworth Road, London, Southwark	19.06.2023
• 35 Barkworth Road, London, Southwark	19.06.2023
• Flat 6, 16 Barkworth Road, London	19.06.2023
• 20 Barkworth Road, London, Southwark	19.06.2023
• Flat 8, Atar House, 179 Ilderton Road	19.06.2023
• Flat 9, 141 Verney Road, London	19.06.2023
• Flat 3, 141 Verney Road, London	19.06.2023
• 25 Ablett Street, London, Southwark	19.06.2023
• Flat 1, 45 Barkworth Road, London	19.06.2023
• Flat 3, 77 Ilderton Road, London	19.06.2023
• 30 Ablett Street, London, Southwark	19.06.2023
• 23 Delaford Road, London, Southwark	19.06.2023
• 32 Delaford Road, London, Southwark	19.06.2023
• 34 Delaford Road, London, Southwark	19.06.2023
• Flat 1, 114 Verney Road, London	19.06.2023
• Flat 6, 47 Barkworth Road, London	19.06.2023
• Flat 3, 47 Barkworth Road, London	19.06.2023
• Flat 4, 56 Barkworth Road, London	19.06.2023
• Flat 6, 54 Barkworth Road, London	19.06.2023
• 33 Barkworth Road, London, Southwark	19.06.2023
• 48 Barkworth Road, London, Southwark	19.06.2023
• 14 Delaford Road, London, Southwark	19.06.2023
• 33 Delaford Road, London, Southwark	19.06.2023
• 21 Bramcote Grove, London, Southwark	19.06.2023
• 37 Ablett Street, London, Southwark	19.06.2023
• 19 Ablett Street, London, Southwark	19.06.2023
• Flat 14, 141 Verney Road, London	19.06.2023
• 41 Ilderton Road, London, Southwark	19.06.2023
• 37 Ilderton Road, London, Southwark	19.06.2023
• 30 Delaford Road, London, Southwark	19.06.2023
• 5 Delaford Road, London, Southwark	19.06.2023
• 29 Delaford Road, London, Southwark	19.06.2023
• 31 Bramcote Grove, London, Southwark	19.06.2023
• 1 Ablett Street, London, Southwark	19.06.2023
• Flat 4, 55 Varcoe Road, London	19.06.2023
• 41 Varcoe Road, London, Southwark	19.06.2023
• 26 Ablett Street, London, Southwark	19.06.2023
• 4 Ablett Street, London, Southwark	19.06.2023
• 8 Splendour Walk, London, Southwark	19.06.2023
• 104 Verney Road, London, Southwark	19.06.2023
• 90 Verney Road, London, Southwark	19.06.2023
• Flat 2, 114 Verney Road, London	19.06.2023
• Flat 7, 47 Barkworth Road, London	19.06.2023
• Flat 4, 47 Barkworth Road, London	19.06.2023
• Flat 6, 77 Ilderton Road, London	19.06.2023
• Flat 5, Atar House, 179 Ilderton Road	19.06.2023
• Flat 104, Milli House, 171 - 177 Ilderton Road	19.06.2023
• 3 Delaford Road, London, Southwark	19.06.2023
• 13 Delaford Road, London, Southwark	19.06.2023
• Flat 1, 54 Barkworth Road, London	19.06.2023
• 24 Ablett Street, London, Southwark	19.06.2023
• 11 Delaford Road, London, Southwark	19.06.2023
• 28 Barkworth Road, London, Southwark	19.06.2023

- 51 Varcoe Road, London, Southwark 19.06.2023
- Flat 2, 16 Barkworth Road, London 19.06.2023
- 33 Varcoe Road, London, Southwark 19.06.2023
- Flat 5, 77 Ilderton Road, London 19.06.2023
- South Bermondsey Railway Station, Rotherhithe New Road 19.06.2023
- Flat 11, 141 Verney Road, London 19.06.2023
- 37 Delaford Road, London, Southwark 19.06.2023
- 27 Delaford Road, London, Southwark 19.06.2023
- 3 Bramcote Grove, London, Southwark 19.06.2023
- Flat 4, 59 Varcoe Road, London 19.06.2023
- Flat 5, 55 Varcoe Road, London 19.06.2023
- 43 Varcoe Road, London, Southwark 19.06.2023
- 20 Ablett Street, London, Southwark 19.06.2023
- Flat 6, 114 Verney Road, London 19.06.2023
- Flat 2, 47 Barkworth Road, London 19.06.2023
- Flat 3, 56 Barkworth Road, London 19.06.2023
- Flat 8, 54 Barkworth Road, London 19.06.2023
- Flat 7, 54 Barkworth Road, London 19.06.2023
- Flat 5, 54 Barkworth Road, London 19.06.2023
- 29 Barkworth Road, London, Southwark 19.06.2023
- 50 Barkworth Road, London, Southwark 19.06.2023
- 36 Barkworth Road, London, Southwark 19.06.2023
- Flat 9, Atar House, 179 Ilderton Road 19.06.2023
- Flat 10, 141 Verney Road, London 19.06.2023
- 12 A Sylvan Grove, London, SE15 1AR 19.06.2023
- 136 kingsland high street, dalston, london 19.06.2023
- 19 Bramcote Grove, London, Southwark 19.06.2023
- Unit A, Milli House, 171 - 177 Ilderton Road 19.06.2023
- Flat 301, Milli House, 171 - 177 Ilderton Road 19.06.2023
- Flat 203, Milli House, 171 - 177 Ilderton Road 19.06.2023
- 29 Ilderton Road, London, Southwark 19.06.2023
- 24 Barkworth Road, London, Southwark 19.06.2023
- Flat 3, 54 Barkworth Road, London 19.06.2023
- 41 Delaford Road, London, Southwark 19.06.2023
- 33 Bramcote Grove, London, Southwark 19.06.2023
- Flat 7, 56 Barkworth Road, London 19.06.2023
- 131 Verney Road, London, Southwark 19.06.2023
- 47 Ilderton Road, London, Southwark 19.06.2023
- Flat 1, 56 Barkworth Road, London 19.06.2023
- 41 Barkworth Road, London, Southwark 19.06.2023
- 22 Ablett Street, London, Southwark 19.06.2023
- 39 Varcoe Road, London, Southwark 19.06.2023
- 92 Verney Road, London, Southwark 19.06.2023
- Ilderton Primary School, Ilderton Road, London 19.06.2023
- 32 Barkworth Road, London, Southwark 19.06.2023
- 31 Ilderton Road, London, Southwark 19.06.2023
- 24 Delaford Road, London, Southwark 19.06.2023
- 25 Delaford Road, London, Southwark 19.06.2023
- 21 Delaford Road, London, Southwark 19.06.2023
- 7 Bramcote Grove, London, Southwark 19.06.2023
- 35 Ablett Street, London, Southwark 19.06.2023
- 29 Ablett Street, London, Southwark 19.06.2023
- 23 Ablett Street, London, Southwark 19.06.2023

• 16 Ablett Street, London, Southwark	19.06.2023
• 12 Ablett Street, London, Southwark	19.06.2023
• 37 Bramcote Grove, London, Southwark	19.06.2023
• Flat 8, 56 Barkworth Road, London	19.06.2023
• Flat 4, 54 Barkworth Road, London	19.06.2023
• Flat 6, 52 Barkworth Road, London	19.06.2023
• Flat 3, 52 Barkworth Road, London	19.06.2023
• 22 Barkworth Road, London, Southwark	19.06.2023
• Flat 201, Milli House, 171 - 177 Ilderton Road	19.06.2023
• Flat 103, Milli House, 171 - 177 Ilderton Road	19.06.2023
• Flat 4, 77 Ilderton Road, London	19.06.2023
• Flat 7, Atar House, 179 Ilderton Road	19.06.2023
• 34 Barkworth Road, London, Southwark	19.06.2023
• Flat 6, 55 Varcoe Road, London	19.06.2023
• Flat 5, 45 Barkworth Road, London	19.06.2023
• Flat 8, 52 Barkworth Road, London	19.06.2023
• 1 Delaford Road, London, Southwark	19.06.2023
• 5 Bramcote Grove, London, Southwark	19.06.2023
• 8 Ablett Street, London, Southwark	19.06.2023
• Flat 3, 55 Varcoe Road, London	19.06.2023
• Flat 4, 114 Verney Road, London	19.06.2023
• 31 Ablett Street, London, Southwark	19.06.2023
• Flat 4, 141 Verney Road, London	19.06.2023
• 38 Delaford Road, London, Southwark	19.06.2023
• 22 Delaford Road, London, Southwark	19.06.2023
• 43 Delaford Road, London, Southwark	19.06.2023
• 35 Delaford Road, London, Southwark	19.06.2023
• Flat 5, 56 Barkworth Road, London	19.06.2023
• Flat 7, 52 Barkworth Road, London	19.06.2023
• 37 Barkworth Road, London, Southwark	19.06.2023
• Unit A, Atar House, 179 Ilderton Road	19.06.2023
• Flat 1, Atar House, 179 Ilderton Road	19.06.2023
• Flat 13, 141 Verney Road, London	19.06.2023
• Flat 1, 141 Verney Road, London	19.06.2023
• Flat 204, Milli House, 171 - 177 Ilderton Road	19.06.2023
• 23 Ilderton Road, London, Southwark	19.06.2023
• 31 Barkworth Road, London, Southwark	19.06.2023
• Flat 3, Atar House, 179 Ilderton Road	19.06.2023
• Flat 2, 77 Ilderton Road, London	19.06.2023
• 15 Ablett Street, London, Southwark	19.06.2023
• Flat 2, 45 Barkworth Road, London	19.06.2023
• 123 Verney Road, London, Southwark	19.06.2023
• 39 Ilderton Road, London, Southwark	19.06.2023
• Flat 5, 16 Barkworth Road, London	19.06.2023
• Flat 2, 59 Varcoe Road, London	19.06.2023
• 86 Verney Road, London, Southwark	19.06.2023
• 27 Ablett Street, London, Southwark	19.06.2023
• 18 Barkworth Road, London, Southwark	19.06.2023
• Flat 10, Atar House, 179 Ilderton Road	19.06.2023
• 43 Ilderton Road, London, Southwark	19.06.2023
• 27 Ilderton Road, London, Southwark	19.06.2023
• 25 Ilderton Road, London, Southwark	19.06.2023
• 36 Delaford Road, London, Southwark	19.06.2023

• 16 Delaford Road, London, Southwark	19.06.2023
• 9 Bramcote Grove, London, Southwark	19.06.2023
• 3 Ablett Street, London, Southwark	19.06.2023
• 11 Ablett Street, London, Southwark	19.06.2023
• 61 Varcoe Road, London, Southwark	19.06.2023
• Flat 2, 55 Varcoe Road, London	19.06.2023
• 6 Splendour Walk, London, Southwark	19.06.2023
• 32 Ablett Street, London, Southwark	19.06.2023
• 28 Ablett Street, London, Southwark	19.06.2023
• Flat 1, 35 Bramcote Grove, London	19.06.2023
• 9 Splendour Walk, London, Southwark	19.06.2023
• 110 Verney Road, London, Southwark	19.06.2023
• Flat 8, 47 Barkworth Road, London	19.06.2023
• Flat 5, 47 Barkworth Road, London	19.06.2023
• Flat 6, 45 Barkworth Road, London	19.06.2023
• 39 Barkworth Road, London, Southwark	19.06.2023
• Flat 1, 16 Barkworth Road, London	19.06.2023
• 44 Barkworth Road, London, Southwark	19.06.2023
• Flat 102, Milli House, 171 - 177 Ilderton Road	19.06.2023
• Flat 101, Milli House, 171 - 177 Ilderton Road	19.06.2023
• 45 Ilderton Road, London, Southwark	19.06.2023
• 18 Ablett Street, London, Southwark	19.06.2023
• 108 Verney Road, London, Southwark	19.06.2023
• 106 Verney Road, London, Southwark	19.06.2023
• 1 Splendour Walk, London, Southwark	19.06.2023
• Flat 2, 35 Bramcote Grove, London	19.06.2023
• 137 Verney Road, London, Southwark	19.06.2023
• 21 Ilderton Road, London, Southwark	19.06.2023
• 15 Delaford Road, London, Southwark	19.06.2023
• 25 Bramcote Grove, London, Southwark	19.06.2023
• 7 Ablett Street, London, Southwark	19.06.2023
• 21 Ablett Street, London, Southwark	19.06.2023
• 17 Ablett Street, London, Southwark	19.06.2023
• 57 Varcoe Road, London, Southwark	19.06.2023
• 45 Varcoe Road, London, Southwark	19.06.2023
• 37 Varcoe Road, London, Southwark	19.06.2023
• 35 Varcoe Road, London, Southwark	19.06.2023
• 31 Varcoe Road, London, Southwark	19.06.2023
• 7 Splendour Walk, London, Southwark	19.06.2023
• 34 Ablett Street, London, Southwark	19.06.2023
• 6 Ablett Street, London, Southwark	19.06.2023
• 100 Verney Road, London, Southwark	19.06.2023
• 96 Verney Road, London, Southwark	19.06.2023
• 84 Verney Road, London, Southwark	19.06.2023
• 135 Verney Road, London, Southwark	19.06.2023
• 133 Verney Road, London, Southwark	19.06.2023
• Flat 4, 52 Barkworth Road, London	19.06.2023
• Flat 1, 52 Barkworth Road, London	19.06.2023
• Flat 3, 16 Barkworth Road, London	19.06.2023
• 46 Barkworth Road, London, Southwark	19.06.2023
• 40 Barkworth Road, London, Southwark	19.06.2023
• 30 Barkworth Road, London, Southwark	19.06.2023
• Flat 1, 77 Ilderton Road, London	19.06.2023

• Flat 5, 141 Verney Road, London	19.06.2023
• Flat 2, 141 Verney Road, London	19.06.2023
• Flat 12, 141 Verney Road, London	19.06.2023
• Flat 6, 141 Verney Road, London	19.06.2023
• 77 Ilderton Road, London, Southwark	19.06.2023
• 39 Jarrow Road, London, Southwark	19.06.2023
• 33 Ilderton Road, London, Southwark	19.06.2023
• Flat 11, Atar House, 179 Ilderton Road	19.06.2023
• Flat 1, 55 Varcoe Road, London	19.06.2023
• 18 Delaford Road, London, Southwark	19.06.2023
• 17 Bramcote Grove, London, Southwark	19.06.2023
• Flat 5, 114 Verney Road, London	19.06.2023
• Christ Apostolic Church, 163 Ilderton Road, London	19.06.2023
• 29 Bramcote Grove, London, Southwark	19.06.2023
• Flat 2, 54 Barkworth Road, London	19.06.2023
• 25 Barkworth Road, London, Southwark	19.06.2023
• 20 Delaford Road, London, Southwark	19.06.2023
• Flat 5, 52 Barkworth Road, London	19.06.2023
• Flat 2, 52 Barkworth Road, London	19.06.2023
• 39 Delaford Road, London, Southwark	19.06.2023
• 2 Splendour Walk, London, Southwark	19.06.2023
• 53 Varcoe Road, London, Southwark	19.06.2023
• 28 Delaford Road, London, Southwark	19.06.2023
• 27 Barkworth Road, London, Southwark	19.06.2023
• 7 Delaford Road, London, Southwark	19.06.2023
• 1 Bramcote Grove, London, Southwark	19.06.2023
• 14 Ablett Street, London, Southwark	19.06.2023
• 119 Verney Road, London, Southwark	19.06.2023
• 13 Ablett Street, London, Southwark	19.06.2023
• 38 Barkworth Road, London, Southwark	19.06.2023
• 26 Barkworth Road, London, Southwark	19.06.2023
• Flat 2, Atar House, 179 Ilderton Road	19.06.2023
• 35 Ilderton Road, London, Southwark	19.06.2023
• 12 Delaford Road, London, Southwark	19.06.2023
• 23 Bramcote Grove, London, Southwark	19.06.2023
• 33 Ablett Street, London, Southwark	19.06.2023
• Flat 3, 59 Varcoe Road, London	19.06.2023
• Flat 1, 59 Varcoe Road, London	19.06.2023
• 29 Varcoe Road, London, Southwark	19.06.2023
• 27 Varcoe Road, London, Southwark	19.06.2023
• 3 Splendour Walk, London, Southwark	19.06.2023
• 94 Verney Road, London, Southwark	19.06.2023
• 129 Verney Road, London, Southwark	19.06.2023
• 127 Verney Road, London, Southwark	19.06.2023
• Flat 3, 45 Barkworth Road, London	19.06.2023
• Flat 4, 16 Barkworth Road, London	19.06.2023
• Flat 6, Atar House, 179 Ilderton Road	19.06.2023
• Flat 7, 141 Verney Road, London	19.06.2023
• Unit B, Milli House, 171 - 177 Ilderton Road	19.06.2023
• Flat 202, Milli House, 171 - 177 Ilderton Road	19.06.2023
• Flat 12, Atar House, 179 Ilderton Road	19.06.2023
• 49 Ilderton Road, London, Southwark	19.06.2023
• 121 Verney Road, London, Southwark	19.06.2023

• 42 Barkworth Road, London, Southwark	19.06.2023
• 179A Ilderton Road, London, Southwark	19.06.2023
• 9 Ablett Street, London, Southwark	19.06.2023
• 102 Verney Road, London, Southwark	19.06.2023
• Flat 4, 45 Barkworth Road, London	19.06.2023
• Flat 8, 45 Barkworth Road, London	19.06.2023
• 17 Delaford Road, London, Southwark	19.06.2023
• 15 Bramcote Grove, London, Southwark	19.06.2023
• 5 Splendour Walk, London, Southwark	19.06.2023
• 47 Varcoe Road, London, Southwark	19.06.2023
• 112 Verney Road, London, Southwark	19.06.2023
• 98 Verney Road, London, Southwark	19.06.2023
• Flat 4, Atar House, 179 Ilderton Road	19.06.2023
• 1A Zampa Road, London, Southwark	19.06.2023
• 26 Delaford Road, London, Southwark	19.06.2023
• 11 Bramcote Grove, London, Southwark	19.06.2023
• 5 Ablett Street, London, Southwark	19.06.2023
• 49 Varcoe Road, London, Southwark	19.06.2023
• 4 Splendour Walk, London, Southwark	19.06.2023
• 10 Ablett Street, London, Southwark	19.06.2023
• 125 Verney Road, London, Southwark	19.06.2023
• Flat 1, 47 Barkworth Road, London	19.06.2023
• Flat 7, 45 Barkworth Road, London	19.06.2023
• Flat 2, 56 Barkworth Road, London	19.06.2023
• Ilderton Primary School, Varcoe Road, Southwark	19.06.2023
• Premier House, 52 London Road, Twickenham TW1 3RP	19.06.2023

Consultation Letters to Internal Consultees:

Initial consultation carried out with all internal consultees, on 09.03.2023.

Re-consultation Letters to Internal Consultees:

Name of Internal Consultee:	Reply Received?	Reply Received?
• Highways Development and Management	13.09.2023	YES
• Planning Policy (Energy)	14.09.2023	YES
• Flood Risk Management & Urban Drainage	14.09.2023	YES
• Archaeology	20.06.2023	YES
• Community Infrastructure Levy Team	20.06.2023	YES
• Design & Conservation Team (Old Kent Rd)	20.06.2023	YES
• Local Economy	20.06.2023	YES
• Ecology	20.06.2023	YES
• Environmental Protection	20.06.2023	YES
• Highways Development and Management	20.06.2023	YES
• Highways Licensing	20.06.2023	No
• Housing Regeneration and Delivery	20.06.2023	No
• Planning Policy (Energy)	20.06.2023	YES
• Flood Risk Management & Urban Drainage	20.06.2023	YES
• Transport Policy	20.06.2023	YES
• Urban Forester	20.06.2023	YES
• Waste Management	20.06.2023	YES
• Transport Policy	06.10.2023	YES
• Transport Policy	06.09.2023	YES

Consultation Letters to External Consultees:

Initial consultation carried out with all external consultees, on 09.03.2023.

Re-consultation Letters to External Consultees:

Name of External Consultee:	Reply Received?	Reply Received?
• Environment Agency	20.06.2023	YES
• Great London Authority	20.06.2023	YES
• Historic England	20.06.2023	YES
• London Fire & Emergency Planning Authority	20.06.2023	YES
• Health and Safety Executive (Planning G1)	20.06.2023	No
• TfL London Underground & DLR Infrastructure	20.06.2023	YES
• Natural England - London & South East Re	20.06.2023	YES
• Network Rail	20.06.2023	YES
• Metropolitan Police Service (Designing O	20.06.2023	YES
• TfL Spatial Planning	20.06.2023	YES
• Thames Water	20.06.2023	YES

Consultation responses received

Reference:	23/AP/0387
Proposal:	Redevelopment of the site to provide two separate buildings comprising large scale purpose built shared living units, conventional residential dwellings, flexible commercial and community floorspace, a not-for-profit café community use, children's playspace, public realm improvements, landscaping and other associated works.
Location:	79-161 Ilderton Road, London, Southwark SE16 3JZ

Consultation Responses from Neighbours and Local Groups:	
Contributor Address:	Date Received:
• 12 A Sylvan Grove, London, SE15 1AR	04.04.2023
• 136 Kingsland High Street, Dalston, London E8 2NS	04.04.2023
• Ilderton Primary School, Varcoe Road, Southwark, SE16 3LA	19.04.2023
• Premier House, 52 London Road, Twickenham, TW1 3RP	11.05.2023
Re-consultation Responses from Neighbours and Local Groups:	
None received.	

APPENDIX 6

Reference:	23/AP/0387
Proposal:	Redevelopment of the site to provide two separate buildings comprising large scale purpose built shared living units, conventional residential dwellings, flexible commercial and community floorspace, a not-for-profit café community use, children's playspace, public realm improvements, landscaping and other associated works.
Location:	79-161 Ilderton Road, London, Southwark SE16 3JZ

Community Review Panel: Feedback from meeting 4 July 2022

Summary

1. The Community Review Group welcomes the opportunity to review this proposal and sees merit in the way the scheme is aiming to meet the demand for homes for a range of people, including young professionals, and new arrivals to the capital. The way the scheme makes use of the site's available space to create a pocket park, podium and rooftop gardens is also welcome. The panel commented on the architecture, recommending that the applicant could develop the design of the façade further to have more references to the Bermondsey industrial vernacular. Some concerns were raised about how the co-living scheme will work in practice. The panel asks for further thought about how quality of life can be maximised for residents. It also feels that providing too many facilities within the scheme may reduce the amount that residents utilise local services outside the scheme. Similarly, allowing local people use facilities in the new development will support integration between new and existing residents. Whilst acknowledging that it is a car-free scheme, the panel asks for careful thought vehicle access, for example for supermarket deliveries and refuse collection.

Co-living

2. The panel comments that this scheme has many similarities to the student accommodation schemes they have reviewed previously but recognises that this is aimed at a different market of residents.
 - It can see the appeal for some people who may otherwise be living in shared housing, of having their own private studio flat.
 - The panel is unsure about exactly what profile of person will live in schemes such as these but does welcome that other completed schemes are well occupied.
 - The panel stresses it is difficult to know if a co-living scheme is the right use of the site without knowing what the rents will be. It would like to be reassured they will be genuinely affordable.

- The panel urges the applicant to develop the scheme so that it is conducive to longer-term residencies, which will help foster a better sense of community.

Studio flats

3. The panel acknowledges the creative way the studio flats have been configured. Nevertheless, although bigger than the policy recommended 18sqm per person, the panel highlights that 20sqm not big enough for long term living..
4. The panel understands that 10% of the studios are accessible for residents with disabilities. However, within the standard studio flats, the minimal space will limit flexibility to adapt to residents' changing needs. The panel was told that in this scenario, the resident would have to move out. If this is the case, it is essential that support is in place to help find suitable accommodation elsewhere. For example, the panel asked what would happen if a resident became pregnant? The units would not be suitable for family life.

Integration with the local area

5. The panel recognises that the proposal has a good provision of on-site facilities, amenities, and social space for residents. However, the panel highlights the risk of residents having little need or no need to use the existing local services in the surrounding area. It sees this a potential limitation to new residents integrating with the local community.
6. The panel advocates that the scheme could be improved if the applicant gives more thought to how this scheme can avoid becoming isolated from the local area, as a result of all the services available on-site.
7. The panel is glad to see there is space on the ground floor designed to be used by local people and not just residents. However, as this will be managed as commercial space, the panel asks that plans for how it will work with and benefit the local community should be further developed.

Architecture

8. The panel feels the proposed architecture has positive qualities, and offers some suggestion about how it could be further improved.
9. The building facades as depicted in the presentation have a notably pink hue. The panel suggests that more neutral tones are used. The panel also suggests further thought about how the architecture draws inspiration from the Bermondsey industrial vernacular. For example, arched window heads are characteristic of historic brick buildings, and could be introduced to interest to the facades. A nearby example is the Peak Frean biscuit factory.
10. The panel worries that the balconies with solid balustrades shown on the visualisations may cut out light for the studio flats. Projecting balconies may also reduce light for the units below. It suggests that glass or metal railing balustrades

would maximise light inside the studio flats. Winter gardens rather than balconies may be needed on lower floors because Ilderton Road has a lot of traffic. Similarly, balconies overlooking the railway line may be less usable because of noise, and the design team should consider how to mitigate this.

Landscape

11. The panel appreciates the way the scheme the way the scheme makes use of the site's available space to create a pocket park, podium and rooftop gardens. The panel welcomes the proposed play provisions for different age groups. It emphasises that the landscaping and play provisions should allow for ball games, and that such activities can happen in small spaces on the site.

Parking and deliveries

12. The panel accepts that this is a car-free scheme and recognises that the proximity to the overground station means it will be accessible. It asks the applicant to consider how service providers such as delivery vehicles, will approach and park at the site, and plan for scenarios such as if a number of delivery vehicles at the same time.

Next steps

13. The Community Review Panel is available to review the plans again if required, at the next stage of design development.

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MUNICIPAL YEAR 2023-24

COMMITTEE: PLANNING COMMITTEE (MAJOR APPLICATIONS) B

NOTE:

Original held in Constitutional Team; all amendments/queries to Gregory Weaver/Gerald Gohler, Constitutional Team, Tel: 020 7525 3667/7420

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